




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
INSPECTOR GENERAL

November 17, 2022

**MEMORANDUM**

**SUBJECT:** Notification of Audit:  
The EPA's Identification and Replacement of Lead Service Lines in Disadvantaged Communities  
Project No. OA-FY23-0037

**FROM:** Michael D. Davis, Director   
Environmental Investment and Infrastructure  
Office of Audit

**TO:** Radhika Fox, Assistant Administrator  
Office of Water

Lawrence Starfield, Acting Assistant Administrator  
Office of Enforcement and Compliance Assurance

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin fieldwork on an audit of the EPA's identification and replacement of lead service lines in disadvantaged communities. This audit is part of the OIG's [oversight plan](#) for fiscal year 2022. This audit also addresses the following top management challenges for the Agency: integrating and leading environmental justice and enforcing environmental laws and regulations.

The OIG's objective is to determine whether the EPA distributed Water Infrastructure Improvements for the Nation, or WIIN, Act funds to replace lead service lines in disadvantaged communities in adherence with applicable guidance. The OIG plans to conduct work in the Office of Water, or OW, Office of Enforcement and Compliance Assurance, or OECA, and regional offices. Applicable generally accepted government auditing standards will be used in conducting our audit. The anticipated benefits of this audit are improved operational efficiency.

We will contact you to arrange a mutually agreeable time to discuss our objectives. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the audit process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the audit. Throughout the audit, we will provide updates on a regular basis.

To expedite our audit, please be ready to provide the following information at the entrance conference:

1. Points of contact within OECA, the OW, and all regions responsible for the administration of the WIIN Act grant programs.
2. A point of contact to walk us through how WIIN Act grant funds are awarded and monitored.
3. A list of all WIIN Act grant recipients from inception to present.
4. A list of complaints related to lead in drinking water received through the Office of Ground Water and Drinking Water's Hotline and OECA's Report a Violation tool.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an April 28, 2021 email message to EPA employees, conveyed his "expectation that EPA personnel provide OIG timely access to records or other information" and observed that "full cooperation with the OIG is in the best interest of the public we serve." We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the administrator and include the incident in the *Semiannual Report to Congress*.

We will post this memorandum on our public website at [www.epa.gov/oig](http://www.epa.gov/oig). Anyone with knowledge of potential fraud, waste, abuse, misconduct, or mismanagement related to this audit should contact the OIG Hotline at (888) 546-8740 or via an electronic form on the "OIG Hotline" [webpage](#).

cc: Janet McCabe, Deputy Administrator  
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