



Audit of the EPA's Fiscal Year 2021 Environmental Justice Collaborative Problem-Solving Cooperative Agreements

August 6, 2025 | Report No. 25-P-0046

Background, Scope, & Methodology

In response to a congressional request, our objective was to determine whether the fiscal year 2021 Environmental Justice Collaborative Problem-Solving, or EJCPs, Program was achieving project objectives and whether the U.S. Environmental Protection Agency's monitoring of these projects ensured that funds were used as intended. For FY 2021, the EJCPs Program awarded about \$6.8 million to 34 applicants for projects that address environmental and public health issues stemming from air pollution and unsafe drinking water.

The Agency awards funds via cooperative agreements when substantial EPA program involvement with recipients of the funds is anticipated during their projects. Since September 2022, the EPA Office of Environmental Justice and External Civil Rights, or OEJECR, has overseen the EJCPs Program, while each EPA region manages the cooperative agreements within its purview. Previously, the Office of Environmental Justice, located in the Office of Policy under the EPA Office of the Administrator, oversaw this work. In March 2025, the EPA announced that it would terminate the Environmental Justice and Diversity, Equity, and Inclusion arms of the Agency. This termination included cancelling all EJCPs cooperative agreements, with about \$40 million remaining in unspent funds.

We conducted this performance audit from October 2024 to May 2025 in accordance with generally accepted government auditing standards, except for assessing internal controls. Specifically, we were unable to fully assess internal controls because the EPA terminated all EJCPs cooperative agreements. We believe that this departure from the standards had no adverse effect on the evidence obtained and that the evidence provides a reasonable basis for our findings and conclusions based on our audit objective. To answer our objective, we judgmentally selected six FY 2021 EJCPs cooperative agreements with a combined awarded amount of \$1.15 million across three EPA regions. We reviewed the EPA's request for applications and project files, interviewed the EPA's regional project officers, and conducted site visits to EJCPs cooperative agreement recipients.

Finding

We were unable to determine whether the EJCPs cooperative agreements we reviewed fully achieved the project objectives described in work plans, as well as whether the EPA's monitoring of these projects ensured that the funding was being used as intended. Specifically, (1) four of six work plans did not consistently contain well-defined measurable outputs and expected outcomes, (2) three of six recipients' performance reports lacked details to fully measure progress, and (3) the project officers for four of six projects did not document their review of recipients' performance reports.

Criteria



EPA Order 5700.7A1, *Environmental Results under EPA Assistance Agreements*, states that:

- EPA program offices must ensure that work plans contain well-defined outputs and, to the maximum extent practicable, expected outcomes.
- Outputs must be measurable during the assistance agreement funding period.
- EPA program offices must review recipients' performance reports and document this assessment.

Cause



The OEJECR did not provide sufficient guidance to supplement EPA Order 5700.7A1 for the EJCPs Program to implement during its approval of work plans and monitoring of cooperative agreements.

Without measurable objectives—outputs and outcomes—the EPA cannot assess project success or ensure that the expended amount of almost \$1.1 million of cooperative agreement funds that we reviewed were used as intended. Further, if project officers do not document their reviews of recipient performance reports, the EPA may lack critical information to ensure that project objectives are being met. As a result, recipients may not be held accountable for the success of their projects.

Because of the pending changes in OEJECR operations, we are notifying management of this issue. We are aware of recent efforts to improve guidance and oversight tools, such as the October 2024 standard operating procedure to review performance reports. However, as the Agency determines which offices will assume the OEJECR's functions, it should take appropriate action to address the issue that we identified. If your office does so, we would appreciate notification of that action.