



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

THE INSPECTOR GENERAL

August 28, 2013

**MEMORANDUM**

**SUBJECT:** Quick Reaction Report: EPA Must Take Steps to Implement Requirements of Its Scientific Integrity Policy  
Report No. 13-P-0364

**FROM:** Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is written over the printed name.

**TO:** Bob Perciasepe, Deputy Administrator

This is our report on the subject evaluation conducted by the Office of Inspector General of the U.S. Environmental Protection Agency. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the EPA position.

**Action Required**

You are not required to provide a written response to this report because the corrective actions with estimated completion dates were provided in response to the draft quick reaction report. Please update the EPA Management Audit Tracking System as you complete the planned corrective actions. We will post this report to our website at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact Assistant Inspector General for Program Evaluation Carolyn Copper at (202) 566-0829 or [copper.carolyn@epa.gov](mailto:copper.carolyn@epa.gov), or Director for Special Program Reviews Eric Lewis at (202) 566-2664 or [lewis.eric@epa.gov](mailto:lewis.eric@epa.gov).

# OIG Evaluation of Agency Comments to Draft Quick Reaction Report

Overall Comments	OIG
<p><b>Comment #1</b> - “I have personally met with the Office of Inspector General management several times to develop coordination procedures on actions related to allegations of scientific misconduct and therefore I am surprised by the tone and method that is being used for this draft report.”</p>	<p><b>OIG Response #1</b> - We understand those coordination procedures. However, those matters pertain to how our offices will coordinate when scientific misconduct allegations or scientific integrity allegations are received. Those coordination procedures do not apply to how OIG coordinates with Agency counterparts when we conduct audits and evaluations of Agency activities and programs. The manual that covers how we coordinate in those activities is 2750, which your offices audit liaison is the point of contact for. We believe the tone of our draft report is balanced and fair.</p>
<p><b>Comment #2</b> - “During our last meeting, I suggested that OIG attend the Agency's Scientific Integrity annual meeting scheduled for June 25. You have already received and accepted a formal invitation to this meeting.”</p>	<p><b>OIG Response #2</b> -The Agency’s plans to hold a Scientific Integrity annual meeting were announced in a May 8 memo issued by the Acting EPA Administrator, and which occurred after OIG staff started its work to issue the draft report. While we did participate in that meeting, that type of meeting cannot be a substitute for conveying OIG findings on matters of scientific integrity, or draft report findings that have not been through OIG’s quality assurance review process.</p>
<p><b>Comment #3</b> - “Further, the hot line call mentioned in this report and the report's recommendations do not appear to me to have any connection with each other.”</p>	<p><b>OIG Response #3</b> -The information on the hotline is provided solely for context. We received a hotline allegation that was not framed as a scientific integrity allegation. However, during the course of our review, we discovered that an EPA employee did not follow scientific integrity principles. This other report is in draft and therefore we are limited in our ability to provide further details at this time.</p>
<p><b>Comment #4</b> - “The draft report demonstrates both a lack of clear understanding of the Policy and also any recognition of what has been done thus far to implement it at the Agency.”“The Quick Reaction Report implies that no progress has been made on the training development action; this is simply not true.”</p>	<p><b>OIG Response #4</b>- We have read the policy and understand it. Our findings are based on information we obtained from the (now former) interim scientific integrity official in early March 2013 and our review of the policy. The former interim scientific integrity official reviewed the draft quick reaction report and did not dispute the facts we reported.</p> <p>However, in response to our draft quick reaction report, the current interim scientific integrity</p>

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	<p>official provided the OIG with new information on correctives actions and milestone dates regarding the agency' progress on the development and implementation of the training and annual reporting schedule. This information is included under the section entitled "Agency Response to Draft Quick Reaction Report and OIG Evaluation."</p>
<p><b>Comment #5</b> - "I request that you withdraw the draft report at this time. In my view, an appropriate time to review the EPA's implementation of the Policy would be after the first annual report is issued and the first cycle of training is at least well underway, if not completed."</p>	<p><b>OIG Response #5</b> - The OIG does not plan to withdraw its report. Rather, as the standard OIG practice, when the agency provides new information in response to a draft OIG report, that information will be included in OIG's final report so that we are reporting the best available information we have. In this case, the information on corrective actions and milestones dates that the current interim scientific integrity chairman has reported in response to our report is included under the section entitled "Agency Response to Draft Quick Reaction Report and OIG Evaluation."</p>
Technical Comments	OIG Response
<p><b>Comment #6</b> - "Page 3, in the first sentence of the first paragraph, the draft report states that, "In response, the agency agreed to make the Principles of Scientific Integrity E Training mandatory for scientific and technical staff and to update the course ... " In fact, the Office of Research and Development, not the agency, provided those responses to the OIG recommendations."</p>	<p><b>OIG Response #6</b> - The OIG checked the referenced audit report, and confirmed this fact. The final report will state this action was taken by the Office of Research and Development.</p>
<p><b>Comment #7</b> - "Page 4, in the first full paragraph, the draft report states that, "During our meeting with the interim scientific integrity official, he could not provide any projected milestone dates or timeframes for when the committee will complete this training requirement." This is factually incorrect. The interim scientific integrity official said that the Committee should finish the training this year."</p>	<p><b>OIG Response #7:</b> The former interim scientific integrity official never stated to the OIG that the training would be completed in calendar year 2013. Rather, the former interim scientific integrity official stated that a timeline for completion of the training program was hard to determine (at the time of our March 2013 meeting) since the committee was still waiting to see how the union intended to</p>

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	<p>participate. The former interim scientific integrity official reviewed OIG’s draft quick reaction report and did not dispute the facts in it, including information obtained in interviews with the former official.</p>
<p><b>Comment #8</b> - “Page 4, in the first full paragraph, the draft report states that, "On May 1, 2013, according to the Audit Follow-up Coordinator for ORD and the agency's Management Audit Tracking System, the estimated completion date for the agencywide training on the February 2012 <i>Scientific Integrity Policy</i> has been revised to December 31, 2013. However, neither the audit follow-up coordinator nor the Management Audit Tracking System entry indicated whether the agency's Scientific Integrity Committee was involved in establishing the completion date for the agencywide training."The date approved by the Scientific Integrity Committee was coordinated with ORD's Audit Coordinator. This statement is factually incorrect and needs to be deleted.”</p>	<p><b>OIG Response #8</b> - We communicated with the audit follow-up coordinator and the coordinator did not state that the Scientific Integrity Committee established the December 2013 date for completion of the agencywide training. We also reviewed the Management Audit Tracking System records and found no evidence that the December 2013 date was coordinated through the Scientific Integrity Committee. However, based on the information provided by the current interim scientific integrity official in response to our draft quick reaction report, we note in this report that the date was coordinated and approved by the Scientific Integrity Committee. This reference is included under the first bullet of the section entitled “Agency Response to Draft Quick Reaction Report and OIG Evaluation.”</p>

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<p><b>Comment #9</b> - “Page 4, in the second full paragraph, last sentence, the draft report says that, “The interim scientific integrity official stated that the committee would have to develop and implement training on the <i>Scientific Integrity Policy</i> for the EPA’s employees before they can complete the annual reporting requirement.” This is factually incorrect.”</p> <p>“When asked whether the Committee had completed the annual report, the interim scientific integrity official replied that the Committee was discussing the format for the annual report. He did not state that the annual report would have to wait for training development.”</p>	<p><b>OIG Response #9</b> - The former interim scientific integrity official reviewed OIG’s draft quick reaction report and did not dispute the facts in it, including information obtained in interviews with the former official.</p>
<p><b>Comments on Recommendations</b></p>	<p><b>OIG Response</b></p>
<p>We recommend that the EPA’s Deputy Administrator direct the Scientific Integrity Committee to:</p> <ol style="list-style-type: none"> <li>1. Develop and implement agencywide training on the <i>Scientific Integrity Policy</i> in a manner that will minimize further delay in the EPA’s adherence to policy requirements.</li> </ol> <p><b>Comment #10</b> - “In a letter from the unions dated last November 21, 2012, the unions acknowledge that the EPA reached out to them for their participation (Attachment 3). When no representatives were named, Mary Greene, Deputy Director of the Office of the Science Advisor responded back to them on January 9, 2013, again requesting participation (Attachment4.) Union representative names were finally provided on May 3, 2013, and the first full workgroup meeting has already taken place. At the same time, the Committee has continued to develop the training module on the Scientific Integrity Policy. As reported to the OIG on April 3, 2013, the Committee plans to finalize the scientific integrity</p>	<p><b>OIG Response #10</b> - Our findings are based on information we obtained from the (now former) interim scientific integrity official in early March 2013, during which we were not informed of the established date of December 31, 2013, for finalizing the scientific integrity training module. Nonetheless, the agency’s comments in response to our draft quick reaction report are responsive to recommendation 1. The agency’s reported actions include a plan and a date for corrective action. Therefore, the OIG considers this recommendation to be resolved.</p>

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training module by December 31, 2013 and make it available through skill port.”

2. Complete and issue an annual report on the status of scientific integrity in the EPA before its first formal review of the policy.

**Comment #11** – “In a memorandum to the Scientific Integrity Committee dated May 8, 2013, the Acting Administrator reiterated his commitment to scientific integrity and provided thoughts to the Committee on the organization of the annual meeting on scientific integrity and the content of the annual report. He requested that the Committee complete the annual report by the end of Fiscal Year 2013. A copy of his memorandum is found at Attachment 5. The Scientific Integrity Committee has reviewed an outline for the annual report on scientific integrity and, after receiving input at the upcoming annual meeting on June 25, plans to finalize the report by September 30, 2013.”

3. Provide the Deputy Administrator with a written plan describing the action plan and milestones for implementing and completing the training and issuing the annual report.

**Comment #12** – “The third recommendation, to provide the Deputy Administrator with a written plan for completing the training and issuing the annual report, is not needed as we have already outlined the path forward, and the Deputy Administrator has been briefed, provided input, and agreed with the plan presented to him.”

**OIG Response #11** - The agency’s comments are responsive to recommendation 2. The agency’s reported actions include a plan and a date for corrective action. Therefore, the OIG considers this recommendation to be resolved.

**OIG Response #12** - The Agency’s comments are responsive to recommendation 3. The Agency’s reported actions include a plan and a date for corrective action. Therefore, the OIG considers this corrective action to be completed and the recommendation to be closed.