



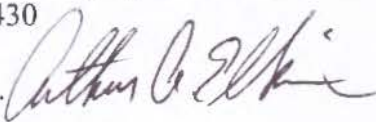
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN - 8 2014

THE INSPECTOR GENERAL

MEMORANDUM

SUBJECT: Implementation Plan With Cost Sharing Methodology Needed for Region 8 Senior Environmental Employee Work on Lead Risk Reduction Report No. 13-P-0430

FROM: Arthur A. Elkins Jr. 

TO: Shaun McGrath
Regional Administrator, Region 8

Thank you for your December 20, 2013, response to the findings and recommendations from the subject report. In our report we made the following recommendations to Region 8:

1. Develop a strategy for implementing the Lead Renovation, Repair and Painting Program in Region 8 that defines program goals, performance measures, organizational responsibilities, and a methodology for Senior Environmental Employee (SEE) funding.
2. Develop an oversight process to evaluate the region's success in implementing the strategy.

Region 8 agreed with our findings and recommendations and has taken corrective actions to address them. We appreciate the region's efforts to be responsive to our recommendations.

The region's response for recommendation 2 is complete and we will close the recommendation in our internal assignment tracking system. Per EPA Manual 2750, please continue to track corrective actions in the agency's audit tracking system until all actions are completed.

For recommendation 1, the region provided a copy of its lead risk reduction program implementation strategy. The strategy effectively outlined program goals and organizational responsibilities, but we believe the strategy could better define the methodology for SEE funding. In our report, we referenced an earlier Office of Inspector General report on Region 8's Risk Management Program wherein our office also recommended that the region develop an implementation strategy.¹ The implementation strategy developed in response to that report included a chart on regional resources by full-time equivalent, SEEs and funding amounts. We suggest that the region take a similar approach on a workable cost sharing methodology irrespective of the region's annual DI STAG (Direct Implementation State and Tribal Assistance Grant) amount. For example, the region could consider a percentage-based cost sharing methodology using the SEE totals denoted in the Enforcement, Compliance and Environmental Justice (ECEJ) and Office of Partnerships and Regulatory Assistance

¹ EPA Region 8 Needs to Better Manage the Risk Management Program for Airborne Chemical Releases, Report No. 09-P-0130, issued March 30, 2009.

(ORPA) work plans attached to the region's implementation strategy (i.e., ECEJ's 1.48 SEEs represent 34 percent of the 4.4 SEE total whereas OPRA's 2.92 SEEs represent 66 percent of the 4.4 SEE total). This recommendation will remain open in our internal assignment tracking system pending receipt of additional specificity on the cost sharing methodology. Please provide us information on the cost sharing methodology within 3 weeks, or by January 27, 2014.

If you or your staff have any questions regarding this report, please contact Patrick Gilbride, Product Line Director for Science, Research, and Management Integrity Evaluations, at (303) 312-6969; or Erin Barnes-Weaver, Project Manager, at (303) 312-6871.

- cc: Deputy Regional Administrator, Region 8
- Assistant Regional Administrator, Region 8 Office of Enforcement, Compliance and Environmental Justice
- Assistant Regional Administrator, Region 8 Office of Partnerships and Regulatory Assistance
- Deputy Assistant Regional Administrator, Region 8 Office of Enforcement, Compliance and Environmental Justice
- Deputy Assistant Regional Administrator, Region 8 Office of Partnerships and Regulatory Assistance
- Audit Follow-Up Coordinator, Region 8