



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

FEB 7 2012

THE INSPECTOR GENERAL

MEMORANDUM

SUBJECT: Close-Out of OIG Report No. 11-P-0702, *Procedural Review of Greenhouse Gases Endangerment Finding Data Quality Processes*, September 26, 2011

TO: Paul T. Anastas
Assistant Administrator for Research and Development

Michael L. Goo
Associate Administrator for Policy

Gina McCarthy
Assistant Administrator for Air and Radiation

Thank you for your January 11, 2012, response to the subject report. We appreciate the U.S. Environmental Protection Agency's (EPA's) constructive approach to resolving the issues raised in our report.

In accordance with EPA Manual 2750, your response included a proposed corrective action plan addressing each of the open recommendations. The proposed corrective actions and proposed timelines for completion meet the intent of our recommendations. Thus, with this memorandum, we are closing these recommendations in our tracking system. The Agency is responsible for tracking and certifying completion of these actions in its Management Audit Tracking System. Please notify my staff if there is a significant change in the agreed-to corrective action plan.

The attached Office of Inspector General action plan analysis provides detailed information on each of the corrective actions for recommendations 1, 2.a., 2.b., and 3, and the timelines for completion. If you or your staff have any questions regarding this memorandum or the attachment, please contact Elizabeth Grossman, Acting Assistant Inspector General for Program Evaluation, at (202) 566-0838; Rick Beusse at (919) 541-5747; or Jim Hatfield at (919) 541-1030.

Arthur A. Elkins, Jr.

Attachment

cc: Bob Perciasepe, Deputy Administrator
Scott Fulton, General Counsel
Malcolm Jackson, Assistant Administrator for Environmental Information and
Chief Information Officer
Brenda Mallory, Deputy General Counsel, Office of General Counsel
Shannon Kenny, Deputy Associate Administrator, Office of Policy
Lek Kadeli, Deputy Assistant Administrator for Management, Office of
Research and Development (ORD)
Janet McCabe, Principal Deputy Assistant Administrator, Office of Air and
Radiation (OAR)
Kevin Teichman, Deputy Assistant Administrator for Science, ORD
Bicky Corman, Deputy Associate Administrator, Office of Policy
Mike Flynn, Acting Deputy Assistant Administrator, OAR
Norman Adkins, Audit Follow-Up Coordinator, ORD
David LaRoche, Audit Follow-Up Coordinator, OAR
J. Anthony Ogden, Counsel to the Inspector General, Office of Inspector General (OIG)
Elizabeth Grossman, Acting Assistant Inspector General for Program Evaluation, OIG
Rick Beusse, Director, Air and Research Program, Office of Program Evaluation, OIG
Jim Hatfield, Project Manager, Office of Program Evaluation, OIG

**OIG Action Plan Analysis, OIG Report No. 11-P-0702, Procedural Review of Greenhouse Gases
Endangerment Finding Data Quality Processes, September 26, 2011**

OIG recommendation	Agency action(s) taken, ongoing, or planned	OIG analysis	Status
<p>1. Direct the Environmental Protection Agency (EPA) Science Policy Council to revise the flowchart on page 2 of EPA's <i>Peer Review Handbook</i> to ensure that the flowchart accurately depicts Office of Management and Budget (OMB) requirements for external peer review of highly influential scientific assessments.</p>	<p><i>EPA Response:</i> Office of the Science Advisor (OSA) staff will develop a modification, as appropriate, to the flow chart on page 2 of EPA's <i>Peer Review Handbook</i> to clarify as needed the OMB requirements for external peer review of highly influential scientific assessments. The modified flow chart will be reviewed by the Agency's Peer Review Advisory Group. EPA's Science Advisor will then submit the modified flow chart to EPA's Science and Technology Policy Council (formerly the Science Policy Council) for concurrence and incorporation into EPA's <i>Peer Review Handbook</i>.</p> <p><i>Planned Completion Date:</i> 6/30/2012</p> <p><i>Lead Responsibility:</i> EPA Science Advisor</p>	<p>We accept the Agency's planned actions and the timeline for completion of the corrective actions.</p>	<p>Recommendation closed.</p>
<p>2.a. Direct the EPA Science Policy Council to instruct program offices that, when using influential scientific information or highly influential scientific assessments supporting an action, to include language in the preamble of proposed and final rules that specifically states that the action was supported by influential scientific information or a highly influential scientific assessment, and certifies that EPA conducted a peer review of the supporting information in accordance with OMB's <i>Final Information Quality Bulletin for Peer Review</i>.</p>	<p><i>EPA Response:</i> EPA's Science Advisor and the Associate Administrator for Policy will issue a joint memorandum to the Agency's Assistant and Regional Administrators reiterating the use of language from the Agency's Peer Handbook (Attachment A, page C-3) for the preambles of proposed and final rules (actions) that specifically states: (a) whether the action was supported by influential scientific information or a highly influential scientific assessment; and (b) whether or not a peer review of supporting information was conducted in accordance with EPA's <i>Peer Review Handbook</i>.</p> <p><i>Planned Completion Date:</i> 6/30/2012</p> <p><i>Lead Responsibility:</i> EPA Science Advisor and Associate Administrator for Policy</p>	<p>We accept the Agency's planned actions and the timeline for completion of the corrective actions.</p>	<p>Recommendation closed.</p>

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2.b. Direct the EPA Science Policy Council to instruct program offices that, when using influential scientific information or highly influential scientific assessments supporting an action, to include a compliance statement in its action memoranda stating that the Agency followed its peer review policy.

EPA Response: EPA's Science Advisor and the Associate Administrator for Policy will issue a joint memorandum to the Agency's Assistant and Regional Administrators reiterating that, when using influential scientific information or a highly influential scientific assessment supporting an action, to include a compliance statement in their action memoranda stating that the Agency followed its peer review policy (as required by the Agency's Peer Handbook, Attachment B, page C-6).

We accept the Agency's planned actions and the timeline for completion of the corrective actions.

Recommendation closed.

Planned Completion Date: 6/30/2012

Lead Responsibility: EPA Science Advisor and Associate Administrator for Policy

3. Revise EPA's guidance document, *A Summary of General Assessment Factors for Evaluating the Quality of Scientific and Technical Information*, to establish minimum review and documentation requirements for assessing and accepting data from other organizations.

EPA Response (part 1): A workgroup under the auspices of the Science and Technology Policy Council will evaluate existing EPA review and documentation requirements for assessing and accepting data from third party organizations. The workgroup will develop modifications to be made to EPA's guidance document, *A Summary of General Assessment Factors for Evaluating the Quality of Scientific and Technical Information*, to include minimum review and documentation requirements for assessing and accepting data from third party organizations.

We accept the Agency's planned actions and the timeline for completion of the corrective actions.

Recommendation closed.

Planned Completion Date: 4/27/2012

EPA Response (part 2): The workgroup will submit the modifications to the Science and Technology Policy Council for concurrence and approval.

Planned Completion Date: 6/30/2012

EPA Response (part 3): An update EPA's guidance document, *A Summary of General Assessment Factors for Evaluating the Quality of Scientific and Technical Information*, is finalized and published, to include as appropriate minimum review and documentation requirements for assessing and accepting data from third party organizations.

Planned Completion Date: 12/31/2012

Lead Responsibility: Deputy Director, Office of the Science Advisor