



At a Glance

Why We Did This Project

A November 2018 U.S. Environmental Protection Agency Office of Inspector General scientific integrity survey yielded hotline complaints on potential internal control issues with the EPA's Quality System. We conducted this audit to determine whether the Office of Mission Support has controls in place to carry out its responsibility in developing and coordinating the mandatory agencywide Quality System.

The Quality System provides requirements for conducting quality management activities for all environmental data collection performed by or for the Agency. Its primary goal is to ensure that environmental data are of sufficient quantity and quality to support intended uses. Each EPA office implements a quality system, and Quality System staff is responsible for its oversight, policies, procedures, training, and tracking.

This report addresses the following:

- *Operating efficiently and effectively.*

This project addresses a key EPA [management challenge](#):

- *Improving data quality and filling identified data gaps.*

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EPA Needs to Address Internal Control Deficiencies in the Agencywide Quality System

What We Found

The OMS has not fully implemented internal controls for the mandatory agencywide Quality System. We found that the OMS has not reviewed policies, procedures, and guidance within required time frames. For example, reviews of two quality policies were 15 years overdue. We also found that the OMS has not conducted required annual reviews for five years. The OMS has also not conducted regular assessments of program and regional quality systems as more than half of the systems had not had a review in the past six years. Also, the OMS has not assessed staff and resource needs since 2008, and the OMS has not performed a programmatic risk assessment. Additionally, the OMS has not developed a strategic plan, implemented a tracking system, or provided agencywide training.

After five years and \$1.3 million towards the development of an agencywide tracking system, the OMS does not know the status of the agencywide Quality System.

OMS leaders and staff identified four factors that led to control deficiencies:

- (1) Quality System leaders over time have had varying priorities;
- (2) Quality System staff had a backlog of work;
- (3) Quality System leaders determined that variations in the length, details, and format of annual reviews made them difficult to analyze and compare; and
- (4) the Quality System lacked resources for its work.

The EPA and the public rely upon the quality of the Agency's data, which helps the Agency make reliable, cost-effective, and defensible decisions. Additionally, the EPA uses its Quality System to manage the quality of its environmental data generation, collection, and use. The Quality System covers activities such as determining hazardous or toxic wastes in the environment and establishing health risk levels, supporting enforcement monitoring efforts, and mapping human health risk data. Poor data quality negatively impacts the EPA's effectiveness in monitoring programs that directly impact public health and could also subject the EPA to significant financial and legal risks.

OMS leaders agree that the Quality System needs improvement and are taking steps to strengthen its internal control system. However, until the OMS fully implements internal controls, it cannot know the status or health of the agencywide Quality System.

Recommendations and Planned Agency Corrective Actions

We made 15 recommendations to the assistant administrator for Mission Support to improve internal controls for the agencywide Quality System. The OMS agreed with 13 recommendations, which are either completed or resolved with corrective actions pending. The OMS disagreed with two recommendations which are unresolved with resolution efforts in progress.