




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

THE INSPECTOR GENERAL

August 27, 2020

MEMORANDUM

SUBJECT: Response to Planned Corrective Actions for Office of Inspector General Report No. 20-P-0065, *EPA Needs to Improve Management and Monitoring of Time-Off Awards*, issued December 30, 2019

FROM: Sean W. O'Donnell 

TO: Donna Vizian, Principal Deputy Assistant Administrator
Office of Mission Support

Thank you for your memorandum dated August 7, 2020, which outlines the U.S. Environmental Protection Agency's planned corrective actions and estimated milestone dates for Recommendations 1, 2, and 3 issued in the subject Office of Inspector General report. However, we do not agree with the Agency's planned corrective actions.

Recommendation 1 requests that the Office of Mission Support "[r]evise EPA Manual 3130 A2, Recognition Policy and Procedures Manual, to establish a methodology for determining the equivalent value for time-off awards." The EPA's planned corrective action does not meet the intent of this recommendation for two reasons:

- The planned corrective action does not identify when a revised Manual will be issued. The planned corrective action only identifies when a revised policy will be made available for final review in the Directives Clearance. Further, the estimated completion date for beginning the final review of the Manual is almost three years after the subject report was issued. The Agency should propose complete and timely corrective actions, including justifications for the almost three-year review process, as well as interim milestones and dates to document its progress.
- The interim policy/guidance and awards guidance described in your memorandum do not consider the equivalent value for time-off awards. The interim policy/guidance and awards guidance do not contain a defined methodology or formal guidance documenting how time-off awards should be valued. Without a defined value for time-off awards, the Agency cannot determine whether a combined award is commensurate with the employee's achievements.

Recommendation 2 requests that the Office of Mission Support "[u]pdate the EPA's 2016 Interim Policy Change to the Monetary Awards Approval Process and incorporate the policy into EPA Manual 3130 A2 to require that the combined value of all awards (both monetary and time-off) be used to determine if the award is commensurate with the employee's achievements and has the appropriate level of review and approval." The EPA's planned corrective action does not meet the intent of this recommendation because it does not identify when a revised Manual will be issued.

Recommendation 3 requests that the Office of Mission Support “[e]stablish internal control procedures to manage time-off awards as part of EPA resource management.” The EPA did not propose a planned corrective action that addresses the recommendation.

As a result, we consider Recommendations 1, 2, and 3 issued in the subject report unresolved. The Agency should follow the dispute resolution process defined in EPA Manual 2750.

If you or your staff have any questions, please contact Rashmi Bartlett, acting assistant inspector general for Audit, at (202) 566-1363 or barlett.rashmi@epa.gov; or John Trefry, director, Forensic Audits, at (202) 566-2474 or trefry.john@epa.gov.

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