



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

THE INSPECTOR GENERAL

February 18, 2022

**MEMORANDUM**

**SUBJECT:** Response to Corrective Actions for Office of Inspector General  
Report No. [19-P-0155](#), *Actions Needed to Strengthen Controls over the EPA Administrator's and Associated Staff's Travel*, issued May 16, 2019

**FROM:** Sean W. O'Donnell

A handwritten signature in blue ink that reads "Sean W O'Donnell".

**TO:** Faisal Amin, Chief Financial Officer

Thank you for your August 6, 2021 memorandum, which outlines the U.S. Environmental Protection Agency's planned corrective actions and estimated completion dates for four of the 14 recommendations issued in the subject Office of Inspector General report. The other ten recommendations were previously resolved. Based on the information in your memorandum, subsequent discussions with the Office of the Chief Financial Officer between November 2021 and January 2022, and additional supporting documentation provided in the course of these discussions, we agree that the planned corrective actions meet the intent of Recommendations 1, 2, 12, and 14. All recommendations for the subject report are now considered either completed or resolved with corrective actions pending.

When the report was issued, the OCFO had completed corrective actions for Recommendations 3 and 8. We accepted the OCFO's planned corrective actions for Recommendations 4, 5, 6, and 13 on June 29, 2020. We reached resolution with the Office of International and Tribal Affairs on Recommendations 10 and 11, for which the then-acting assistant administrator certified corrective action completion on March 1, 2021. We also accepted the chief of staff's corrective actions for Recommendations 7 and 9 on September 16, 2021.

For Recommendation 12, we are accepting the corrective actions described in the OCFO's August 6, 2021 memorandum and this recommendation is therefore resolved with corrective actions completed. For Recommendations 1, 2 and 14, we held several meetings with the OCFO to further discuss the proposed corrective actions and our findings. As a result, the OCFO made the following changes to its corrective actions to resolve these recommendations:

- For Recommendation 1, the corrective action memorandum proposed to report \$35,980 in improper payments for the premium costs incurred by the Protective Service Detail agents accompanying former Administrator Scott Pruitt on his first-class and business-class flights in 2017. The PSD costs for accompanying the former administrator on his travel were part of our Recommendation 1, but the OCFO proposed its corrective actions under Recommendation 14 in its August 2021 corrective action memorandum.

Based on subsequent meetings, the OCFO proposed to increase the improper payment amount for the PSD agents by \$8,875, for a total of \$44,855. This adjustment resolved the OIG-identified

discrepancies between the Agency's calculation and the Concur documents. Therefore, Recommendation 1 is resolved with corrective action pending.

- For Recommendation 2, the corrective action memorandum stated that former Administrator Pruitt did not have first-class or business-class travel approved without sufficient justification. However, based on the Agency's analysis provided for Recommendation 14, we found that he had premium flights in January and February 2018 that were not approved with proper authority at the time of travel. As a result, the OCFO proposed reporting \$11,796 in improper payments for the premium costs incurred by the former administrator and his PSD agents for these flights. This additional corrective action meets the intent of the recommendation and Recommendation 2 is resolved with corrective action pending.
- For Recommendation 14, the corrective action memorandum stated that the Agency's evaluation of the business-class flights taken by the former administrator's support staff identified two exceptions where the premium flights were not sufficiently justified. The OCFO provided retroactive justifications and approvals for these two staff members and for the PSD agents who used business-class flights when they were not traveling with the former administrator. Therefore, Recommendation 14 is resolved with corrective actions completed.

You should track implementation of the corrective actions in the Agency's audit tracking system until all actions are completed.

We will post this memorandum on our public website at [www.epa.gov/oig](http://www.epa.gov/oig).

cc: Dan Utech, Chief of Staff, Office of the Administrator  
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