



U.S. ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF INSPECTOR GENERAL

*Catalyst for Improving the Environment*

## Evaluation Report

# Office of Inspector General Access to Agency Information and Personnel

Report No. 09-P-0222

August 25, 2009

**Report Contributors:**

Rae Donaldson  
Dwayne E. Crawford  
Eric Lewis  
Elizabeth Grossman  
Maria Martir

**Abbreviations**

EPA	U.S. Environmental Protection Agency
OECA	Office of Enforcement and Compliance Assurance
OIG	Office of Inspector General



# At a Glance

*Catalyst for Improving the Environment*

## Why We Did This Review

We analyzed internal guidance used by the U.S. Environmental Protection Agency (EPA) program and regional offices for interacting with the Office of Inspector General (OIG) to determine whether the guidance was (1) applied consistently Agency-wide, or (2) included procedures that included burdensome administrative requirements or allowed screening of information prior to issuance to the OIG.

## Background

The Office of Enforcement and Compliance Assurance instructed its managers not to provide information directly to the OIG. However, the Inspector General Act of 1978 authorizes federal inspectors general to assess information and personnel relative to program operations of federal agencies. EPA's own policy also endorses OIG access to personnel and timely information.

**For further information, contact our Office of Congressional, Public Affairs and Management at (202) 566-2391.**

**To view the full report, click on the following link:**  
[www.epa.gov/oig/reports/2009/20090825-09-P-0222.pdf](http://www.epa.gov/oig/reports/2009/20090825-09-P-0222.pdf)

## **Office of Inspector General Access to Agency Information and Personnel**

### **What We Found**

At the time of our review, EPA did not have consistent overall guidance governing interaction with the OIG. Consequently, some EPA program and regional offices promulgated internal guidance that impeded OIG access to Agency information and personnel. These internal guidances included procedures with burdensome administrative requirements that allowed EPA managers to screen and potentially change information prior to issuing the information to the OIG. Others required personnel to seek supervisory guidance before responding to OIG inquiries.

Our Agency-wide survey found that EPA employees had a significant lack of knowledge about interacting with the OIG. Eighty-three percent of respondents either were not aware or did not know of any guidance or procedures governing interaction with the OIG. Fourteen percent of the respondents believed they may face retribution if they provided information or documents to the OIG without permission from a supervisor. An additional 31 percent did not know whether they would face retribution if they provided documents or information to the OIG without permission.

### **Corrective Actions Taken**

We recommended that the Deputy Administrator issue guidance to all EPA program and regional offices on interacting with the OIG to ensure unfettered access to information and personnel; and that all lower level guidance, written or unwritten, be revoked. In response, the EPA Administrator issued prescriptive guidance on August 7, 2009, to address these issues. The guidance instructed EPA personnel to provide OIG auditors, evaluators, and investigators with full and unrestricted access to personnel, facilities, records, or other information or material needed by the OIG to accomplish its mission. The EPA Administrator defined unrestricted access to mean that managers and staff are not to impose burdensome administrative requirements or screening procedures that could impede OIG access to needed employees and materials. The EPA Administrator instructed all EPA offices to review their policies and procedures related to interaction with the OIG and conform to her guidance by September 4, 2009. The OIG believes the actions taken by the Administrator to be sufficient to address the draft recommendation. Since the actions were taken prior to issuance of our final report, no further action is necessary.



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

OFFICE OF  
INSPECTOR GENERAL

August 25, 2009

**MEMORANDUM**

**SUBJECT:** Office of Inspector General Access to Agency Information and Personnel  
Report No. 09-P-0222

**FROM:** Wade T. Najjum  
Assistant Inspector General for Program Evaluation  
Office of Inspector General

A handwritten signature in black ink, appearing to read "Wade T. Najjum", is written over the typed name in the "FROM:" field.

**TO:** Scott Fulton  
Acting Deputy Administrator  
Office of the Administrator

This is the final report of the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA) evaluation of guidance and procedures governing OIG access to personnel, records, and other information. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. In our draft report issued on June 30, 2009, the OIG recommended that EPA's Office of the Administrator issue overall Agency guidance governing interaction with the OIG during the performance of our reviews to ensure unfettered access to information and personnel; and that all lower level guidance, written or unwritten, be revoked. In response, the EPA Administrator issued a memorandum on August 7, 2009. The OIG has determined the actions taken by the Office of the Administrator to be sufficient to address issues raised during our review. Accordingly, we have made necessary changes in this report where appropriate. We have included the EPA Administrator's memorandum as Appendix A. Further, since the action taken by the Agency was prior to issuance of this final report, no further action is necessary.

The estimated cost of this project – calculated by multiplying the project's staff days by the applicable daily full cost billing rates in effect at the time – is \$199,469.

We have no objection to the further release of this report to the public. This report will be available at <http://www.epa.gov/oig>. Should you have any questions, please contact Eric Lewis, Director, Special Reviews, at 202-566-2664 or [lewis.eric@epa.gov](mailto:lewis.eric@epa.gov).

# Table of Contents

---

## Chapters

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
	Purpose ... ..	1
	Background .....	1
	Scope and Methodology .....	2
<b>2</b>	<b>EPA Lacked Consistent Guidance for Interacting with the OIG .....</b>	<b>4</b>
	Analysis of Program and Regional Offices' Guidance .....	4
	Agency-wide Survey on Employee Interaction with the OIG .....	6
	Conclusions .....	7
	Corrective Actions Taken .....	8
	<b>Status of Corrective Actions Taken .....</b>	<b>9</b>

## Appendices

<b>A</b>	<b>EPA Administrator's Memorandum on Cooperation with the OIG .....</b>	<b>10</b>
<b>B</b>	<b>Distribution .....</b>	<b>13</b>

# Chapter 1

## Introduction

### Purpose

We performed an Agency-wide evaluation of the U.S. Environmental Protection Agency's (EPA's) guidance and procedures governing Office of Inspector General (OIG) access to personnel, records, and other information.<sup>1</sup> We initiated the evaluation after news organizations reported in July 2008 that EPA's Office of Enforcement and Compliance Assurance (OECA) had formally instructed members of the staff not to talk with the OIG without senior management approval. Our objectives were to determine whether:

- EPA had guidance and procedures for interaction with the OIG that was implemented consistently Agency-wide, or applied in an ad-hoc manner; and
- Established guidance and procedures in any way required burdensome administrative requirements, or allowed screening of information prior to submission to the OIG.

### Background

OIGs were created to conduct and supervise audits and investigations relating to the programs and operations of the Federal Government to provide a means for keeping the heads of federal agencies and Congress fully current and informed about problems and deficiencies relating to the administration of such programs and operations, and the necessity for and progress of correction action. To help ensure this accountability, Congress passed the Inspector General Act of 1978. Section VI of the Act provides each Inspector General with the following authorizations:

- To have access to all records, reports, audits, reviews, documents, papers, recommendations, or other material available to the applicable establishment which relate to programs and operations with respect to which that Inspector General has responsibilities under this Act (Section 6(a)(1)).
- Whenever information or assistance requested under the above section is, in the judgment of an Inspector General, unreasonably refused or not provided, the Inspector General shall report the circumstances to the head of the establishment involved without delay (Section 6(b)(2)).

---

<sup>1</sup> Hereinafter referred to as reviews.

*Government Auditing Standards* (July 2007 Revision) require that:

- Statutorily appointed federal inspectors general comply with generally accepted government auditing standards in conformity with the Inspector General Act of 1978 for audits of federal establishments, organizations, programs, activities, and functions.
- Government managers provide reliable, useful, and timely information for accountability of government programs and operations.
- Auditors must obtain sufficient and appropriate evidence to provide a reasonable basis for findings and conclusions. The evidence should persuade a knowledgeable person that the findings are reasonable.

EPA Manual 2750 notes the OIG is authorized access to all records, reports, documents, etc., under the Inspector General Act. Further, the Manual states:

*...to fulfill its responsibilities, the OIG needs the cooperation of Agency personnel to make full disclosure of information pertaining to instances of waste, fraud and abuse. EPA fully supports the audit management function and endorses the fullest cooperation of all Agency personnel during the entire audit management process. All EPA personnel will disclose and provide pertinent information to auditors.*

## **Scope and Methodology**

We conducted our review in accordance with generally accepted government auditing standards. Those standards require that we adequately plan for the audit; properly supervise audit staff; obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions; and prepare audit documentation related to the planning, conducting, and reporting for each audit. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our review objectives.

We conducted our review from July 2008 through June 2009, during which time we requested and analyzed internal guidance, instructions, and procedures used by EPA program and regional offices to govern interaction with the OIG. We also conducted an Agency-wide survey to assess the level of free interaction EPA employees, contractors and others perceive they have with the OIG.

To achieve our audit objectives, we contacted the Agency's audit follow-up coordinators for EPA's 10 major program offices<sup>2</sup> and 10 regional offices to obtain the guidance used by their respective offices for interacting with the OIG. Where we were able to obtain documentation, we analyzed the documents to determine whether the requirements were implemented consistently Agency-wide, or included procedures that required burdensome administrative requirements or allowed screening of information prior to issuance to the OIG.

As a part of our overall evaluation, we also sponsored an Agency-wide survey from December 15-19, 2008, using the Agency's mass-mailer system. The survey asked EPA employees and others with an EPA e-mail address questions about their knowledge and understanding of existing policies and procedures in their programs governing interaction with the OIG. We also asked questions about the management control environment. We received responses from 1,019 EPA employees and 31 others.

In January 2009, we issued an interim report<sup>3</sup> to the former EPA Deputy Administrator on the results of our survey. In this report, we informed the former Deputy Administrator that the OIG had not completed its analysis of the results or drawn any final conclusions in the interim report. Rather we provided the interim results for information purposes given the survey indicated potentially significant problems.

---

<sup>2</sup> EPA's 10 major programs offices are the Office of the Administrator; Office of Administration and Resources Management; Office of Air and Radiation; Office of the Chief Financial Officer; Office of Enforcement and Compliance Assurance; Office of Environmental Information; Office of Prevention, Pesticides, and Toxic Substances; Office of Research and Development; Office of Solid Waste and Emergency Response; and Office of Water.

<sup>3</sup> Interim Report "*Office of Inspector General Access Survey Results*," Report No. 09-P-0079, January 13, 2009.



## Chapter 2

### EPA Lacked Consistent Guidance for Interacting with the OIG

At the time of our review, EPA did not have consistent overall guidance governing interaction with the OIG. Consequently, some EPA program and regional offices promulgated internal guidance that impeded OIG access to information and personnel. These internal guidance documents added procedures with burdensome administrative requirements, such as allowing EPA managers to screen and potentially change information prior to issuing to the OIG. They also allowed employees to sometimes withhold information or refuse to talk to the OIG. These internal procedures were determined to have limited or delayed OIG access to information and personnel, as authorized by the Inspector General Act and EPA Order 2750.<sup>4</sup>

We also found that over 80 percent of Agency employees responding to our Agency-wide survey were unaware of EPA program office or regional office policies or guidance on how to interact with the OIG. More troubling, 14 percent of the respondents believed they may face retribution if they provided information or documents to the OIG without permission from a supervisor. An additional 31 percent did not know whether they would face retribution if they provided documents or information to OIG without permission. We believe these results reflected the need for overall guidance on interacting with the OIG to avoid confusion regarding the roles of the OIG in terms of its audit and investigative functions.

#### Analysis of Program and Regional Offices' Guidance

The OIG is statutorily authorized access to Agency information on programs and operations, and its personnel, under the Inspector General Act. This information is necessary to gather sufficient and appropriate evidence to provide a reasonable basis for findings and conclusions. Generally accepted government auditing standards require that OIG personnel maintain professional skepticism and verify information provided. Regardless of the good intentions involved, OIG cannot accept a process that allows management to screen or alter information from a source. The OIG agrees to reasonable coordination with the Agency to avoid unnecessary disruptions, and the OIG may seek audit liaison assistance in identifying qualified personnel to interview. However, once the OIG is satisfied that qualified employees have been identified, the Agency should not be allowed the opportunity to screen answers intended for the OIG.

---

<sup>4</sup> Inspector General Act of 1978, Sections 6(a)(1), 6(b)(1); EPA Manual 2750, Chapter 1, Section 3 – “Scope and Applicability,” 12/03/1998.

EPA program and regional offices use audit follow-up coordinators, audit management officials, audit management coordinators, audit liaisons, or other designated officials to manage communications with the OIG during a review. Typically, these officials try to ensure that the OIG reviewers get access to the personnel and information needed to complete the review. However, on occasion, these officials can be impediments to the review. For example:

- These coordinators/officials request or are required to serve as a point of contact for data or access to personnel. This practice is not always feasible in situations when management should not know the exact nature of the request, creating the potential for changing data or influencing statements from qualified staff. When the OIG needs the services of the audit liaisons to help identify qualified Agency personnel for obtaining needed information, the OIG will make that request for assistance and set up a mechanism to keep management informed about the review to the extent practicable.
- Audit follow-up and management coordinators screen or are required to screen information before they deliver it to the OIG. When this occurs, there is the possibility that management could change the data. Depending on the materiality of the data, this requires the OIG to perform additional steps to validate the data.
- Some agency staff perceived that audit liaisons, along with supervisors, managers, or other Agency representatives, are required to be present when they are interviewed by the OIG. This could intimidate qualified staff to present only management's side of the issue.

We contacted EPA audit follow-up coordinators to determine and document the internal policies and procedures used by the Agency's program offices and regional offices governing interaction with the OIG. Our intent was to determine whether EPA had overarching guidance in conformity with the Inspector General Act and *Government Auditing Standards*, and implemented that guidance in a consistent manner. Specifically, we wanted to determine whether the guidance included burdensome administrative requirements or allowed the potential for EPA managers to screen or withhold information from the OIG.

### ***Eleven of 20 Offices Rely on EPA Manual 2750***

Four of 10 program offices and 7 of 10 regional offices told us they rely on EPA Manual 2750 as guidance for interacting with the OIG. The purpose of EPA Manual 2750 is to implement the reporting requirements of the Inspector General Act. Its objectives are to detail processes by which EPA officials respond to OIG reports; OIG and EPA officials resolve audit report findings and recommendations; and EPA officials implement follow-up corrective actions. The Manual does instruct EPA personnel that during an OIG review they must

disclose and provide pertinent information to auditors in a timely manner. However, the Manual does not indicate whether personnel need permission to speak with the OIG or whether EPA management can review or edit information to be provided to the OIG.

### ***Nine Offices Developed Guidance Independent of EPA Manual 2750***

EPA Manual 2750 encourages the development of internal guidance by EPA offices if they need to develop and maintain office-specific operating procedures and controls that promote timely and effective audit resolution. The remaining major offices reported that they had developed their own guidance on communicating with the OIG.

**Program Offices' Written Guidance.** Six of the 10 program offices had developed internal written guidance governing interaction with the OIG. Of these six, internal guidance included procedures that conflict with statutory requirements under the Inspectors General Act or Agency policy regarding the OIG's access to information and personnel. These procedures restrict OIG access through burdensome administrative requirements and/or create a situation that allows Agency managers opportunities to screen information prior to issuing to the OIG.

**Regions' Written Guidance.** Two EPA regions have written internal guidance for interacting with the OIG. One region's guidance sets forth the roles and responsibilities during all phases of the audit process, and requires full cooperation with the OIG throughout the process. The other region's guidance, based in part on EPA Manual 2750, encourages an open channel of communication but requires that a point-of-contact or an alternate collect and provide information (documents and/or files) to the OIG.

A third region did not have written policy or guidance on coordination with the OIG. Rather, the region relies on an unwritten standard operating procedure that requires the region to cooperate with the OIG in accordance with the Inspector General's Project Management Handbook. The region expects that requests concerning audits and evaluations be made through appropriate management channels so that management is aware of developments. Though unwritten, the guidance provides management the opportunity to screen information and control access to qualified personnel.

## **Agency-wide Survey on Employee Interaction with the OIG**

We conducted an Agency-wide survey of EPA employees and others with an EPA e-mail address to determine their knowledge and understanding of existing guidance and procedures in their programs governing interaction with the OIG.

Our survey results found that Agency personnel had a significant lack of knowledge regarding interaction with the OIG. Of 1,050 respondents, 83 percent

either were not aware or did not know of any guidance or procedures governing interaction with the OIG. Several survey respondents also expressed the need for training on what an employee or contractor can or cannot do relative to interaction with the OIG.

There were also some troubling perceptions among the Agency staff about management's attitudes toward staff who provided documentation or talked to OIG staff without permission. Of the 1,050 respondents:

- Eighteen percent did not believe that they can provide documentation or written responses to the OIG without permission from a supervisor. An additional 34 percent said they did not know.
- Fourteen percent believed they may face retribution if they provide information or documents to the OIG without permission from a supervisor. An additional 31 percent did not know whether they will face retribution if they provide documents or information to the OIG without permission.
- Fourteen percent believed they may face retribution if they talk to the OIG without permission from a supervisor. An additional 29 percent did not know whether they will face retribution if they talk to the OIG without permission.

The OIG acknowledges that comments it received in response to these particular questions do not represent the majority. In fact, a majority of the respondents expressed management's willingness to allow their interaction with the OIG without fear of retribution, as long as the respondents informed management that they were providing the information. However, we believe these results tend to correspond with procedures under some program offices' internal guidance that can directly influence staff interaction with the OIG. Uncorrected, these practices could call into question the reliability of information obtained from the Agency and could have required OIG reports to include impairment statements or scope limitations.

## Conclusions

At the time of our review, EPA components had not implemented consistent guidance across all offices regarding interaction with the OIG. This resulted in a lack of understanding of proper roles and responsibilities dealing with statutory oversight organizations. Some EPA program and regional offices developed faulty internal guidance. Evidence obtained from staff loses its reliability when management screens or has the opportunity to alter data during a multi-level review process. Management attempts to keep information from auditors increases the time and costs of an audit, and reduces the reliability of information.

Survey results underscored the need for an overarching guidance governing interaction with the OIG and the need for training in this area.

## **Corrective Actions Taken**

We recommended that the Deputy Administrator issue guidance to all EPA program and regional offices on interacting with the OIG to ensure unfettered access to information and personnel; and that all lower level guidance, written or unwritten, be revoked. In response, the EPA Administrator issued an Agency-wide memorandum on August 7, 2009, that instituted overall Agency guidance governing interaction with the OIG. The purpose of the memorandum was to ensure that EPA managers and staff understand the role of the Agency's OIG and to address how the EPA Administrator expected Agency programs and personnel to interact with the OIG. The OIG has determined that the actions taken by the Office of the Administrator address the issues raised during our review. Accordingly, we have made necessary changes in this report where appropriate. Since the Agency actions were taken prior to issuance of our final report, no further action is necessary.

We have included the EPA Administrator's memorandum as Appendix A

## **Status of Corrective Actions Taken**

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
		Issue overall guidance to all EPA program and regional offices on interacting with the OIG to ensure the OIG has timely and unfettered access to information and personnel during the performance of OIG reviews on EPA programs and operations.	C	Administrator	8/7/2009		
		Revoke all lower level guidance pertaining to interaction with the OIG, both written and unwritten, and do not allow lower level supplementation of the new guidance to be issued.	C	Deputy Administrator	8/7/2009		

- 1 O = recommendation is open with agreed-to corrective actions pending  
 C = recommendation is closed with all agreed-to actions completed  
 U = recommendation is undecided with resolution efforts in progress

**Appendix A*****EPA Administrator's Memorandum on  
Cooperation with the OIG*****MEMORANDUM**

**SUBJECT:** Cooperation with the Office of Inspector General

**FROM:** Administrator Lisa P. Jackson

**TO:** All EPA Employees

As I recently observed in my memorandum on Transparency in the U.S. Environmental Protection Agency's Operations, "[t]he success of our environmental efforts depends on earning and maintaining the trust of the public we serve." One of the key means by which we ensure the kind of accountability deserving of public trust is the process of internal review and oversight carried out by our Office of Inspector General. The purpose of this memorandum is to ensure that EPA managers and staff understand the role of the Agency's OIG and to address how I expect Agency programs and personnel to interact with the OIG.

The OIG is to serve as an independent and objective unit within our Agency, playing an important role in preventing and rooting out fraud, waste, mismanagement and abuse in Agency programs and operations. The OIG also endeavors to improve the efficiency of our Agency programs and operations through the performance of audits, evaluations and inspections. To carry out its statutorily required function, the OIG necessarily requires, on a regular basis, information and assistance from EPA managers and staff.

There is sometimes confusion regarding the roles and responsibilities of the OIG and the Government Accountability Office. While the functions of the OIG and GAO are similar in some respects, the two are in different branches of government and have different authorities and responsibilities. The OIG's primary function is to serve as an accountability and oversight mechanism within and for the benefit of the Executive Branch of government, in compliance with the Inspector General Act of 1978, as amended. GAO is the investigative arm of the United States Congress; this memorandum does not address directly the Agency's interaction with the GAO.

It is imperative that, upon request, Agency personnel provide OIG auditors, evaluators and investigators with full and unrestricted access to personnel, facilities, records (including, but not limited to, reports, databases and documents), or other information or material that is needed by the OIG to accomplish its mission. Unrestricted access means that managers and staff are not to impose burdensome administrative requirements or screening procedures that could impede OIG access to needed employees and materials. Management should not attempt to control or influence the free flow of information to and from the OIG or to frustrate the full and unfettered exchange between EPA personnel and the OIG during the active phase of audits.

My expectation is that we will cooperate with the OIG as follows:

1. Managers and staff are to expeditiously provide materials responsive to an OIG request;
2. Materials should be provided to the OIG in the manner requested, rather than routed through an intermediary for review prior to disclosure;
3. EPA managers and staff must not conceal information or obstruct OIG audits, investigations or other inquiries. Doing so is against EPA policy, and may be in violation of federal law;
4. At any time, the OIG may have access to available information such as policy, guidance, procedures or existing reports and other general information to focus its plans. In the context of specific OIG audits, evaluations or other reviews, the OIG will ordinarily issue a notification letter or kick-off memo to EPA management announcing the objectives of the OIG activity. Frequently, a meeting will be scheduled with EPA management and the OIG staff to discuss the activity. Under all circumstances, EPA managers and staff are to provide complete cooperation upon receipt of such notification; and
5. EPA staff are not required to obtain permission from or inform managers before they speak with OIG representatives during audits, evaluations, investigations or other OIG reviews. Staff may, at their own discretion, contact their manager with any questions regarding their responsibility to cooperate with the OIG or their scheduling of meetings with the OIG, unless, in the context of an investigation, they are instructed otherwise by OIG. In the context of investigations, managers should not question staff about their interactions with the OIG.

The OIG, for its part, has indicated its intent to respect the multiple demands made upon EPA managers and staff and, to the extent possible, to seek to accommodate scheduling difficulties or other time constraints that managers and staffs might face. Also, the OIG is committed to honoring requests for confidentiality to the extent permitted by the law and to handling all EPA documents and information in an appropriate manner.

To ensure that reports from audits, evaluations and other reviews (collectively referred to here as “audits”) are fairly prepared and presented, the OIG staff will endeavor to provide management with significant opportunities for interaction. To this end, an audit will ordinarily begin with an entrance conference or kick-off meeting and will ordinarily conclude its active phase with an exit conference. Management should attend both entrance and exit conferences and make its views and concerns known. At any time during the course of the audit, EPA management may request and meet with the OIG staff to discuss the audit, provide information to clarify management assertions and discuss status and any concerns.

The OIG intends to solicit EPA management for input regarding accuracy and tonal quality frequently during the audit up to and including submission of comments to the written audit product. This interaction should help to avoid misunderstandings. The OIG is committed to give



full consideration to management comments on discussion drafts and formal draft reports in the course of finalizing reports. EPA managers should engage with OIG leadership when it believes that its input is not satisfactorily addressed. In the end, formal Agency comments to the formal draft will ordinarily be attached, in their entirety, to the final OIG report. This interactive process, in which OIG engages management in the audited office in an effort to develop and refine findings and recommendations, is a key part of the OIG process, and Agency managers need to see these opportunities for interaction as their primary means of expression in the context of OIG audits.

All offices are expected to review their policies and procedures related to interaction with the OIG and must conform to this guidance; the offices must certify such conformity to the Deputy Administrator by c.o.b. September 4, 2009.

If you have any questions about this guidance or about an OIG request for information, please contact the Principal Deputy General Counsel at (202) 564-0864 or the Associate Deputy Inspector General and Counsel at (202) 566-0861.

Sincerely,  
Lisa P. Jackson

**Appendix A*****Distribution***

Office of the Administrator  
Acting Deputy Administrator  
Assistant Administrator, Office of Administration and Resources Management  
Assistant Administrator, Office of Air and Radiation  
Assistant Administrator, Office of Enforcement of Compliance Assurance  
Acting Assistant Administrator, Office of Environmental Information  
Assistant Administrator, Office of Prevention, Pesticides and Toxic Substances  
Acting Assistant Administrator, Office of Research and Development  
Assistant Administrator, Office of Solid Waste and Emergency Response  
Acting Assistant Administrator, Office of Water  
Acting Chief Financial Officer  
Acting Regional Administrators, Regions 1-10  
Agency Follow-up Official (the CFO)  
Agency Follow-up Coordinator  
General Counsel  
Associate Administrator for Congressional and Intergovernmental Relations  
Associate Administrator for Public Affairs  
Audit Follow-up Coordinator, Office of Administration and Resources Management  
Audit Follow-up Coordinator, Office of Air and Radiation  
Audit Follow-up Coordinator, Office of the Chief Financial Officer  
Audit Follow-up Coordinator, Office of Enforcement of Compliance Assurance  
Audit Follow-up Coordinator, Office of Environmental Information  
Audit Follow-up Coordinator, Office of Prevention, Pesticides, and Toxic Substances  
Audit Follow-up Coordinator, Office of Research and Development  
Audit Follow-up Coordinator, Office of Solid Waste and Emergency Response  
Audit Follow-up Coordinator, Office of Water  
Audit Follow-up Coordinators, Regions 1-10  
Acting Inspector General