



**OFFICE OF INSPECTOR GENERAL**  
U.S. ENVIRONMENTAL PROTECTION AGENCY

December 7, 2023

**MEMORANDUM**

**SUBJECT:** Notification:  
Evaluation of Institutional Control Documentation in the Superfund Enterprise  
Management System on IJJA-Funded Sites  
Project No. OSRE-FY24-0027

**FROM:** Lindsay Clarke Brubaker, Director   
Environmental Infrastructure Oversight Directorate  
Office of Special Review and Evaluation

**TO:** Barry Breen, Principal Deputy Assistant Administrator  
Office of Land and Emergency Management

The U.S. Environmental Protection Agency Office of Inspector General plans to begin an evaluation of institutional control documentation in the Superfund Enterprise Management System on National Priorities List sites receiving Infrastructure Investment and Jobs Act, or IJJA, funding. This evaluation is self-initiated. This evaluation also addresses the following fiscal year 2024 [top management challenge](#) for the Agency: managing grants, contracts, and data systems.

Our objective is to determine if the upgrade to the Superfund Enterprise Management System is likely to facilitate improved documentation of institutional controls in the institutional control module. We plan to conduct work in the Office of Land and Emergency Management and selected EPA regional offices as necessary. We will conduct the evaluation using the Quality Standards for Inspection and Evaluation, issued by the Council of the Inspectors General on Integrity and Efficiency. The anticipated benefits of this evaluation include helping the EPA ensure that the institutional controls established to protect public health and the environment are functioning as intended. Our evaluation will also help ensure that the planned IJJA-funded site remediations are supported by robust institutional controls.

We will contact you to arrange a mutually agreeable time to discuss our objective. At that time, we can discuss any concerns that you may have and answer any questions about the evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

We respectfully note that the Inspector General Act of 1978, as amended, authorizes the OIG to have timely access to personnel and all materials necessary to complete our objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in a May 16, 2023 email to EPA employees, stated that the “agency and its employees have a duty

to cooperate with OIG” and observed that “full engagement and collaboration between the OIG and EPA provides our agency with the opportunity to improve program performance and efficiency.” If an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG, we will request that you immediately resolve the situation. Consistent with the Inspector General Act, we may report unresolved access matters to the administrator and to Congress.

We will post this memorandum on our public website at [www.epaoig.gov](http://www.epaoig.gov). Anyone with knowledge of potential fraud, waste, abuse, misconduct, or mismanagement related to this evaluation should contact the OIG Hotline at (888) 546-8740 or via an electronic form on the “OIG Hotline” [webpage](#).

cc: Janet McCabe, Deputy Administrator  
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Wesley J. Carpenter, Deputy Chief of Staff for Management, Office of the Administrator  
Clifford Villa, Deputy Assistant Administrator, Office of Land and Emergency Management  
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