



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

THE INSPECTOR GENERAL

August 18, 2021

MEMORANDUM

SUBJECT: Response to Planned Corrective Actions for Office of Inspector General
Report No. [21-P-0132](#), *Resource Constraints, Leadership Decisions, and Workforce Culture Led to a Decline in Federal Enforcement*, issued May 13, 2021

FROM: Sean W. O'Donnell 

TO: Lawrence Starfield, Acting Assistant Administrator
Office of Enforcement and Compliance Assurance

Thank you for your July 12, 2021 memorandum, which outlines the U.S. Environmental Protection Agency's planned corrective actions and estimated milestone dates for the three unresolved recommendations issued in the subject Office of Inspector General report. The report contained eight recommendations: Recommendations 3, 4, 6, 7, and 8 were resolved when the report was issued, while Recommendations 1, 2, and 5 remained unresolved.

Based on the information and supporting documentation provided in your July 2021 memorandum, we do not agree with the Agency's planned corrective actions for the three unresolved recommendations. For Recommendations 1 and 2, our position remains that a full workforce analysis is necessary to truly understand current and future workforce needs. For Recommendation 5, we found the planned corrective actions to be partly responsive. Corrective actions for recommendation 5 should include measures for annual reporting on informal enforcement actions for the proposed corrective actions to be considered fully responsive to our recommendation.

As a result, we continue to consider Recommendations 1, 2, and 5 unresolved. The Agency should follow the dispute resolution process, defined in EPA Manual 2750.

We will post this memorandum on our public website at www.epa.gov/oig.

cc: Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and Compliance Assurance
Andrew LeBlanc, Agency Follow-Up Coordinator
José Kercado, Backup Agency Follow-Up Coordinator
Charles J. Sheehan, Deputy Inspector General
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