



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

JUN 27 2011

DEPUTY ADMINISTRATOR

**MEMORANDUM**

**SUBJECT:** Response to the Office of Inspector General Evaluation Report  
*EPA Faced Multiple Constraints to Targeting Recovery Act Funds*

**FROM:** Bob Perciasepe *Bob Perciasepe*

**TO:** Arthur A. Elkins Jr.  
Inspector General

I am providing the U.S. Environmental Protection Agency's response to the Office of Inspector General evaluation report *EPA Faced Multiple Constraints to Targeting Recovery Act Funds*, Report No. 11-R-0208, April 11, 2011.

The EPA is committed to improving its focus on the achievement of agencywide objectives and priorities and to including environmental-justice principles in our decisions. In particular, the EPA is committed to identifying the sources of information needed to assess socioeconomic conditions in communities and to consider this information, as appropriate, when making future investment decisions, including those that might benefit underserved communities. However, the EPA recognizes that each program has unique authorities and faces limitations and issues that render impractical a single, overarching policy for addressing socioeconomic conditions. The EPA will use socioeconomic information consistent with statutory, regulatory and other authorities as well as other relevant programmatic requirements.

The EPA has worked to develop information and tools that will help the agency to achieve agencywide objectives and priorities for including environmental-justice principles in all decisions. The EPA agrees with OIG's recommendations that the agency take corrective actions that will continue our progress in this area. One step to respond to OIG's recommendations is the implementation of Plan EJ 2014, which will include efforts to highlight potentially relevant sources of information and to help the EPA integrate environmental-justice considerations into the agency's programs, policies and activities. For example, Plan EJ 2014 highlights tools development as an essential element that will advance environmental justice across the EPA and the federal government. Under Plan EJ 2014, the EPA has committed to develop a nationally consistent screening tool to enhance environmental-justice analysis and decision making. The purpose of the screening tool will be to provide for locations across the U.S. a comprehensive and nationally consistent tool for presenting available environmental and demographic data. The tool will aid decision makers in assessing policies and actions to be taken by the EPA in accordance with, and pursuant to, applicable law. The tool will serve as a national baseline screening tool, which should then be supplemented with additional information and on-the-ground experience to help identify overburdened communities that might warrant additional investigation by the EPA to help reduce risk and improve public health. As a result of this effort, increased consistency of data and

methods will be brought to environmental-justice screening work across the EPA to enhance environmental-justice analysis and decision making. The EPA is also working to develop a common mapping platform to serve as a management tool and help provide information to the EPA that enhances environmental-justice analysis and serves to improve our capabilities for place-based decision making.

Also in response to OIG's recommendations, the EPA will reiterate its advice to program offices about including environmental-justice considerations in appropriate competitive grant solicitations. In doing so, the EPA will remind offices that environmental-justice considerations can vary depending on the context and subject matter of a competition and that program offices might need to consult with the Office of General Counsel depending on the language they wish to include.

Please see the attached table for the EPA's specific response to the report's recommendations.

Attachment

cc: Cynthia Giles  
Craig E. Hooks  
Malcolm Jackson  
Michael Goo  
Lisa Garcia

OIG Recommendation	Agency Planned Corrective Action	Planned Completion Date
<p>Establish a clear and consistent regime that can address socioeconomic factors within the bounds of statutory and organizational constraints. Such a regime should allow the Agency to target program funds to achieve Agency-wide objectives and priorities for the inclusion of environmental justice principles in all of EPA's decisions.</p>	<p>The Agency's Plan EJ 2014 is a roadmap that will help EPA integrate environmental justice into the Agency's programs, policies, and activities. Plan EJ 2014 highlights multiple elements that will advance environmental justice across the EPA and the federal government. [Office of Enforcement and Compliance Assurance Office of Environmental Justice (OECA/OEJ)]</p> <p>Under Plan EJ 2014, develop a nationally consistent screening tool to enhance environmental justice analysis and decision-making. [Office of Policy (OP)]</p> <p>Under Plan EJ 2014, develop a common mapping platform to serve as a management tool and help provide information to EPA that enhances environmental justice analysis, and supports our capabilities for place-based decision making. [Office of Environmental Information (OEI)]</p> <p>Reiterate advice to EPA Program Offices on language for the environmental justice factors and language in appropriate competitive grant solicitations [Office of Administration and Resources Management (OARM)]</p>	<p>EJ 2014 [OECA/OEJ – Q4 FY2011]</p> <p>Screening tool [OP – Q2 FY2012]</p> <p>Internal Mapping Platform [OEI – Q4 FY2011]</p> <p>Advice for competitive grants [OARM – Q4 FY2011]</p>
<p>Identify the sources of information needed by its program offices and managers to assess the socioeconomic conditions in communities. Within the bounds of statutory and organizational constraints, this information should be used to identify and target opportunities for which investment and grants, program funding, or technical assistance would return the most benefits in terms of jobs needed, infrastructure improvements, or economic benefit to the community.</p>	<p>Under Plan EJ 2014, develop a nationally consistent screening tool to enhance environmental justice analysis and decision-making. [OP]</p> <p>Reiterate advice to EPA Program Offices on language for the environmental justice factors and language in appropriate competitive grant solicitations [OARM]</p>	<p>Screening tool [OP – Q2 FY2012]</p> <p>Advice for competitive grants [OARM – Q4 FY 2011]</p>