



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

Spending Taxpayer Dollars

Positioning EPA for the Digital Age Requires New Mindsets Toward Printing

Report No. 16-P-0107

March 21, 2016



Report Contributors:

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Abbreviations

APO	Agency Printing Officer
EPA	U.S. Environmental Protection Agency
FMSD	Facilities Management and Services Division
FSSI	Federal Strategic Sourcing Initiative
GPO	U.S. Government Publishing Office
MATS	Management Audit Tracking System
NSCEP	National Service Center for Environmental Publications
OARM	Office of Administration and Resources Management
OIG	Office of Inspector General
OMB	Office of Management and Budget
U.S.C.	U.S. Code

Cover image: Inside view of the National Service Center for Environmental Publications in Blue Ash, Ohio. The image shows rows of boxed publications. (EPA OIG photo)

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At a Glance

Why We Did This Review

The U.S. Environmental Protection Agency's (EPA's) Office of Inspector General (OIG) conducted this audit to determine whether EPA printing and publications operations are efficient and effective, and comply with applicable federal guidance.

Executive Order 13589 on printing encourages agencies to limit the publication and printing of hard copy documents, and presumes that information will be provided in an electronic format whenever practicable. Proper stewardship of federal resources is an essential responsibility of agency managers and staff.

This report addresses the following EPA goal or cross-agency strategy:

- *Embracing EPA as a high-performing organization.*

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[Listing of OIG reports.](#)

Positioning EPA for the Digital Age Requires New Mindsets Toward Printing

What We Found

The EPA's main authoritative guidance for printing operations (Printing Management Manual) is over 20 years old and outdated. The Agency Printing Officer stated that the agency hopes to update its manual once federal regulations are updated. As a result, the manual currently does not provide effective guidance for accountability or oversight.

Without efficient printing management operations, the EPA cannot attain its goal of being a high-performing organization.

EPA's current mindset leads the agency to amass large quantities of printed material. EPA staff believe it is cheaper to print in bulk and then store the material. The potential for waste is high, as evidenced by the nearly 8 million items recycled at the National Service Center for Environmental Publications between June 2013 and March 2015.

Further, the EPA has yet to implement all corrective actions identified in response to a 2014 OIG report on strategic sourcing. The OIG recommended, and the agency agreed, to develop by December 2014 a plan of action to strategically source print management. The EPA has extended its deadlines more than once and still has not established realistic milestones to implement all corrective actions. As a result, the EPA still cannot effectively control print management functions.

Recommendations and Planned Agency Corrective Actions

We recommend that the Assistant Administrator for Administration and Resources Management update the Printing Management Manual to include authorization for decentralized operations within the regions, and issue guidance to reiterate roles and responsibilities. In addition, we recommended that the agency establish achievable milestones to address the recommendations in our prior report. The EPA concurred with all of the recommendations, and the OIG agrees with the agency's proposed actions. When implemented, the corrective actions will meet the intent of our recommendations.

Noteworthy Achievements

EPA headquarters' in-house printing plant is already practicing print-on-demand, so the need for storing materials is nominal. In addition, the agency renegotiated its print contract to reflect industrywide structure, and the rates are now lower than the rates offered by the Federal Strategic Sourcing Initiative.



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

THE INSPECTOR GENERAL

March 21, 2016

MEMORANDUM

SUBJECT: Positioning EPA for the Digital Age Requires New Mindsets Toward Printing
Report No 16-P-0107

FROM: Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is written over the printed name.

TO: Donna Vizian, Acting Assistant Administrator
Office of Administration and Resources Management

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position.

The Facilities Management and Services Division, within the Office of Administration and Resources Management, administers programs related to printing, photocopying and distribution of printed materials.

Action Required

The agency provided corrective actions for addressing the recommendations with milestone dates. Therefore, a response to the final report is not required. The OIG may make periodic inquiries on your progress in implementing these corrective actions. Please update the EPA's Management Audit Tracking System as you complete planned corrective actions. Should you choose to provide a final response, we will post your response on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

This report will be available at www.epa.gov/oig.

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Chapter 1

Introduction

Purpose

The U.S. Environmental Protection Agency's (EPA's) Office of Inspector General (OIG) conducted this audit to determine whether the EPA's printing and publications operations are efficient and effective, and comply with applicable federal guidance.

Background

Enacted in 1968, Title 44 of the U.S. Code (U.S.C.) provides for the general and permanent laws relating to public printing and documents. Title 44 establishes the authority of the Joint Committee on Printing of the U.S. Congress and the U.S. Government Publishing Office (GPO). The EPA Printing Plant is authorized by the Joint Committee on Printing to provide priority and small-volume printing services.

Executive Order 13589, *Promoting Efficient Spending*, issued November 2011, encouraged agencies to:

Limit the publication and printing of hard copy documents, and to presume that information should be provided in an electronic form whenever practicable, permitted by law, and consistent with applicable records retention requirements. Agencies should consider using acquisition vehicles developed by the OMB's [Office of Management and Budget's] Federal Strategic Sourcing Initiative to acquire printing and copying devices and services.

The Printing, Forms, Mail and Photocopying Management section of the Office of Administration and Resources Management (OARM) provides EPA headquarters and regional and field offices with printing support, both in-house and contract. In-house printing is procured or produced only through the Agency Printing Officer (APO) for headquarters personnel, or through the Printing Control Officer in each region. The EPA's printing procurement staff arrange and manage all procurements from both the GPO and commercial contractors.

Protocols used when considering whether to use in-house, GPO or contracted printing services include:

- Cost (in-house versus GPO).
- Quantity (over 80,000 impressions).
- Timing (how quick the job is needed and who can meet the deadline).
- Technical ability.

The National Service Center for Environmental Publications (NSCEP) is the EPA's agencywide storage and distribution facility for publications. Located in Blue Ash, Ohio, near Cincinnati, the NSCEP stores, manages and distributes printed materials for EPA program offices. The NSCEP's processes and procedures are separate, but influenced by the printing operations.

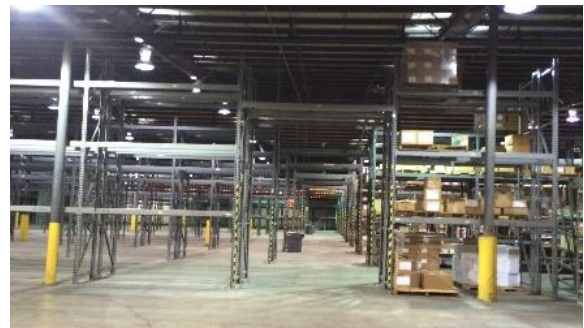
Responsible Office

The EPA's Facilities Management and Services Division (FMSD) administers programs related to printing, photocopying and distribution of printed materials. FMSD is a part of the Office of Administration within the Office of Administration and Resources Management. The Facilities Operations Branch within FMSD provides headquarters, regional and field offices with printing support, both in-house and through contract procurement.

Noteworthy Achievements

The following EPA actions are noteworthy and are discussed in more detail in subsequent chapters:

- The in-house print plant at EPA headquarters practices print-on-demand, so the need to store materials is minimal.
- The NSCEP recycled more than 8 million items between June 2013 and March 2015, issued new standard operating procedures in January 2015, and is in the process of reducing its size by releasing NSCEP warehouse space back to the U.S. General Services Administration.
- The agency renegotiated its print contract in March 2014 to reflect the industrywide pricing structure for black-and-white and color printing. The rates are now lower than the rates offered by the Federal Strategic Sourcing Initiative (FSSI).



NSCEP Distribution Center after recycling 8 million items. (EPA OIG photo)

Scope and Methodology

We conducted this audit from February 2015 through February 2016 in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan

and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

To determine whether EPA printing and publications operations are efficient and effective, and comply with applicable federal guidance, we reviewed the following federal laws and EPA policies and procedures:

- Title 44 U.S.C.—*Public and Printing Documents*.
- *Government Printing and Binding Regulations*, No. 26, February 1990.
- Executive Order 13589—*Promoting Efficient Spending*.
- *EPA Printing Management Manual*, No. 4822, 1994, Ed. 7/25/1994.
- *EPA Communication Product Standards Stylebook*, December 2008.
- *EPA Procedures for Forms Management*—CIO 2103-P-01.0, December 15, 2005.

We interviewed OARM, the APO, and NSCEP staff about the oversight of printing, forms and photocopying. We reviewed and analyzed the print and forms management information provided in response to our notification memorandum questionnaire. In addition, we reviewed inventory reports, cost comparisons, contract and lease agreements, and other memoranda.

We reviewed OARM vulnerability assessments, fiscal years 2014 and 2015 Federal Managers' Financial Integrity Act assurance letters, the agency's management challenges, and related documents. OARM did not identify any weaknesses related to print operations.

Prior Audit Coverage

As part of this audit, we followed up on agency corrective actions that relate to our audit objectives from the following EPA OIG reports:

- Report No. [14-P-0132](#), *Early Warning Report: National Service Center for Environmental Publications in Blue Ash, Ohio, Spent \$1.5 Million to Store Excess Publications*, issued March 11, 2014. The report described how the EPA spent \$1.2 million preserving and storing printed material each year, and an additional \$359,000 for management and leasing costs associated with the agency's distribution center.
- Report No. [14-P-0338](#), *Increased Emphasis on Strategic Sourcing Can Result in Substantial Cost Savings for EPA*, issued August 26, 2014. The report said the EPA "was not participating in the print management" services available governmentwide through the FSSI.

Chapter 2

EPA's Printing and Publications Management Operations Need Improvement

The EPA's main authoritative guidance for printing operations—the Printing Management Manual, dated July 1994—is over 20 years old. Procedures and information in the manual have changed over the years, making the manual outdated. Federal laws, regulations and guidance address requirements on efficient management and spending for printing, photocopying and forms management. The APO stated that the agency hopes to update its manual once federal regulations are updated. As a result, the manual does not currently provide effective guidance for accountability or oversight, which has contributed to the agency's “print in bulk” mindset.

Federal and EPA Requirements for Printing and Publications Management

Regarding 44 U.S.C., *Public Printing and Documents*:

- Section 103 authorizes the Joint Committee on Printing to use any measures it considers necessary to remedy neglect, delay, duplication or waste in public printing and binding, and in the distribution of government publications.
- Section 501, with some exceptions, requires the GPO to perform “all printing, binding, and blank-book work for Congress, the Executive Office, the Judiciary, and every executive department, independent office and establishment of the Government.”
- Section 1105 authorizes the GPO Public Printer to determine the form and style in which the printing or binding ordered by a department is executed, and the material and the size of type used, having proper regard to economy, workmanship and the purposes for which the work is needed.

Government Printing and Binding Regulations, No. 26 (February 1990), provides definitions and general provisions regarding government printing and binding operations. The Joint Committee on Printing also authorizes the EPA's print plant operations, which allows the EPA to provide priority and small-volume printing services.

In Executive Order No. 13589, *Promoting Efficient Spending*, issued November 2011, agencies are encouraged to limit the publication and printing of hard copy documents, and to presume that information should be provided in an electronic

form whenever practicable, permitted by law, and consistent with applicable records retention requirements.

The EPA Printing Management Manual establishes policies and procedures for the preparation, procurement and distribution of printed and other reproduced written materials by EPA employees. According to the manual, the Printing, Photocopy & Mail Management Branch of OARM's FMSD monitors all EPA printing activities, including procurements and copy operator programs. The APO has the authority and responsibility for the day-to-day management of printing activities. The APO "governs EPA printing activities," and ensures the agency "meets all governing federal standards, laws and regulations, and monitors printing activities in all operating components and non-headquarters facilities."

EPA Needs to Update Its Print Manual

The EPA's main guidance for printing operations—the Printing Management Manual—is over 20 years old and outdated. Over the years, changes to the manual have since been superseded, deemed obsolete, or lost. For example, the Printing Management Manual requires the APO within OARM to:

- Administer procedures that govern EPA printing activities.
- Monitor and evaluate agencywide printing.
- Monitor printing activities in all operating components and non-headquarters facilities.

Yet, OARM reports, "Headquarters does not oversee program offices and regional copying/reproduction operations." The agency explained that over the years, headquarters' oversight of printing operations for the regions has been decentralized; however, OARM could not produce the official change in guidance. In fact, according to OARM, the decentralization occurred many years ago, but the office cannot find the memorandum.

Other examples of outdated information in the manual include ordering large quantities rather than several small orders as a step to reduce cost, revisions in reporting requirements, and changes in names and definitions. Moreover, some references noted in the guidance, such as OMB Circular A-3, are obsolete.

Because the memorandum establishing authority for decentralized operations is missing and the agency's main authoritative guidance is outdated, the APO has lost oversight of the EPA's printing and publications operations. Agency staff state that they are discussing reissuing the memorandum for decentralization. The APO further reported it hopes to update agency guidance once federal printing and publication regulations are updated.

The EPA should establish interim guidance to facilitate the most efficient and economical methods for print and inventory management. The interim guidance

should include procedures for monitoring print operations at program and regional offices, as well as include procedures that involve coordination with the NSCEP to ensure alignment with program objectives. Furthermore, if the EPA has decentralized its printing operations as claimed, the agency must establish the authority to reorganize headquarters' oversight of the regions by updating and reissuing the memorandum; otherwise, it can issue an appendix to existing directives or update current guidance. Doing so can help minimize variation and miscommunication.

EPA Needs to Achieve a Culture Change of Ordering and Amassing Excessive Quantities of Printed Materials

The EPA's Printing Management Manual recommends ordering large quantities rather than several small orders as a step to reduce cost. But, it further states, "in general, a 1-year supply of forms, pamphlets and continually used items should be ordered." However, the agency has had a culture that assumes printing costs are not a priority because some staff continue to order without considering the costs associated with storing and distributing printed materials. This is evidenced by the nearly 8 million items recycled by NSCEP staff as a result of the OIG's findings in our March 2014 Report No. [14-P-0132](#), *Early Warning Report: National Service Center for Environmental Publications in Blue Ash, Ohio, Spent \$1.5 Million to Store Excess Publications*. The following is an example of such over-ordering, which occurred in May 2015:



NSCEP Distribution Center before recycling 8 million items. (EPA OIG photo)

Example: The Printing, Forms, Mail and Photocopy Management section of OARM received a request to ship over 300,000 copies of an EPA Lorax booklet, which equates to 3 years' worth of material, to the NSCEP. The program office wanted to store the material at the NSCEP distribution center in anticipation of future orders. Because of our audit of the agency's printing operations, the Printing, Forms, Mail and Photocopy Management section staff questioned the request based on necessity and frequency of shipments, then worked with the program office to adjust the order down to 175,000.

The potential for waste is high, and the EPA is spending up to \$1.2 million per year storing, handling, and tying up funds with inventory. Additional costs include warehouse activities and other direct costs, and up to \$359,000 in leasing costs. Furthermore, publications often change, so having large quantities of outdated material is not a good practice. The nearly 8 million items recycled by NSCEP staff because of the OIG's March 2014 early warning report demonstrated such waste.

Conclusion

Missing and outdated guidance is the leading cause of the EPA's "print in bulk" mindset and practices pertaining to hard-copy printing. The EPA needs to reestablish decentralized authority, develop interim guidance, and update the Printing Management Manual so that FMSD has oversight and control over all agency printing activities and programs. Taking these steps will help change the agency's culture and provide more efficiencies.

Recent Agency Actions Prompted by OIG Work

Since the start of this audit in February 2015, the Printing, Forms, Mail and Photocopy Management section staff now require clarification and justification on all requests for "documents being shipped to the NSCEP to ensure that cost saving measures are taken."

Recommendations

We recommend that the Assistant Administrator for Administration and Resources Management:

1. Update the EPA's main authoritative guidance for printing operations (Printing Management Manual) to include authorization for decentralized operations within the regions.
2. Issue guidance to EPA regions and program offices to reiterate roles and responsibilities to help reinforce the authority of the APO and to change behaviors. Guidance should specifically include procedures to facilitate the most efficient and economical methods for printing and inventory management.

Agency Response and OIG Evaluation

The agency concurred with Recommendations 1 and 2 and provided an estimated completion date of September 30, 2017, for both recommendations.

For Recommendation 1, OARM stated it "will update the Printing Management Manual. The updated manual will clearly outline US Code, Title 44, Section 501, Government Printing and Binding Regulations. The manual will provide guidance for printing nationwide." The OIG concurs with the agency's proposed actions and, when implemented, the corrective actions will meet the intent of Recommendation 1. This recommendation will remain open pending completion of the proposed corrective action.

For Recommendation 2, OARM stated it “will update the agency Printing Management Manual to reiterate the roles and responsibilities of the Agency Printing Officer and the nationwide Printing Control Officers. It will also reflect the current practice of print on demand.” OARM further stated, “Warehouse operations are defined separately from printing operations. Currently, warehouse operations and inventory must be certified in writing annually by the Senior Resource Official to the Director of the Office of Administration. The certification ensures the facilities are assessed to ensure efficiency and identify cost saving opportunities.” The OIG concurs with the agency’s proposed actions and, when implemented, the corrective actions will meet the intent of Recommendation 2. This recommendation will remain open pending completion of the proposed corrective action.

The complete agency response to the discussion draft is in Appendix A.

Chapter 3

EPA Is Slow to Implement Print Management Corrective Actions

The EPA has yet to implement all print management corrective actions identified in response to the August 2014 OIG Report No. [14-P-0338](#), *Increased Emphasis on Strategic Sourcing Can Result in Substantial Cost Savings for EPA*. In response to the OIG's recommendations, the agency agreed to (1) develop a plan of action by November 2014 to strategically source print management, and (2) implement procedures by December 2014 to ensure controls are in place so that all strategically sourced vehicles are utilized unless a valid exception is approved. OMB Circulars A-50 and A-123 require federal agencies to promptly resolve corrective actions. The EPA has extended its deadlines more than once on its corrective action plans for Recommendations 1 and 3 of the August 2014 report due to delayed coordination within OARM. By not setting realistic milestones and fully implementing corrective action plans, the EPA cannot effectively control print management functions.

Audit Follow-Up Criteria

OMB Circular No. A-50, *Audit Follow-up*, affirms that corrective action by management on resolved findings and recommendations is essential for improving the effectiveness and efficiency of government operations. The circular states, "Resolution shall be made within a maximum of 6 months after issuance of a final report" and "Corrective action should proceed as rapidly as possible." Also, the follow-up system must "Maintain accurate records of the status of audit reports or recommendations through the entire process of resolution and corrective action."

OMB Circular No. A-123, *Management's Responsibility for Internal Control*, Section 5, states:

Agency managers are responsible for taking timely and effective action to correct deficiencies.... Management should track progress to ensure timely and effective results.... Management has a responsibility to complete action, in a timely manner, on audit recommendations on which agreement with the IG has been reached.

EPA Needs to Establish Realistic Milestones and Implement Corrective Actions

In its August 2014 report, the OIG made two recommendations pertaining to print management, which the agency agreed to and provided corrective actions.

However, when we reviewed the EPA’s Management Audit Tracking System (MATS) in November 2015 to ascertain the status of the agency’s corrective actions, we noted inaccuracies and assorted revised completion dates, as summarized in Table 1 below.

Table 1: Summary of corrective action taken per MATS and per audit verification as of November 2015

Recommendation	Did the action officials complete appropriate corrective actions?	Planned Completion Date	Revised Completion Date(s)
1. Develop a plan of action to strategically source wireless services and print management. If the plan is to source these commodities internally because it is not practicable under the FSSI initiative, perform a price comparison with established pricing under the FSSI solution(s) to ensure the best possible pricing is negotiated.	No	11/30/2014	3/15/2015 3/30/2015 5/29/2015 ¹
3. Develop and implement policies and procedures to ensure that controls are in place so that all strategically sourced vehicles are utilized unless a valid exception is approved.	No	12/31/2014	6/30/2015 5/31/2016

¹ Inaccurate - shown as completed in MATS.

Source: OIG analysis of agency data for EPA OIG Report No. 14-P-0338.

For Recommendation 1, the OIG recommended the EPA develop a plan of action to strategically source print management services by performing a price comparison with established pricing under the FSSI solution to ensure the best possible pricing is negotiated. In response to the Recommendation 1, OARM agreed with the recommendation and reported that the office renegotiated the print contract in March 2014 to lower rates. The OIG verified that OARM did renegotiate its print contract.

OARM also reported it would issue an agencywide memorandum to encourage changes in behavior; specifically, changes emphasizing reduced printing, reduced color printing, double-sided printing, and less desktop printing. Additionally, OARM anticipated establishing an agencywide “Print Commodity Team” to determine the best approaches for managing both ongoing and future strategic sourcing print efforts at the EPA. The original planned completion date for this corrective action was November 2014, with revised completion date of March 2015. MATS reported corrective action as completed in May 2015; however, OARM did not establish the Print Commodity Team nor issue a memorandum encouraging changes in behavior. OARM stated that the corrective actions were still pending revision and review because “collaboration on developing a memorandum that reflects all aspects of the initiative continues.” OARM further reports that the Print Commodity Team would become the Agency Integrated

Product Team. An implementation date for the Agency Integrated Product Team has not been set.

As for Recommendation 3, OARM agreed and stated it is “currently in the process of developing a policy to make strategically sourced vehicles mandatory, if appropriate. This policy will include an exception process that requires users to justify reasons for not using a strategically sourced vehicle. However, in some cases, the justification may be an exception for usage set forth in the contract vehicle.” OARM said the policy document would be published agencywide by December 2014. However, OARM delayed corrective action on this recommendation because the strategic sourcing policy is undergoing final review; the current completion date is now May 2016.¹

Conclusion

As noted in Table 1, not all print management corrective actions have been implemented, and information recorded in MATS is inaccurate. Standards for internal controls are intended to provide assurance that operations are effective and efficient. By not setting realistic milestones and fully implementing corrective action plans, the EPA cannot effectively control print management functions.

Recommendation

We recommend that the Assistant Administrator for Administration and Resources Management:

3. Establish achievable milestones in MATS and complete corrective action to address the following recommendation identified in the August 2014 OIG report, *Increased Emphasis on Strategic Sourcing Can Result in Substantial Cost Savings for EPA*: “Complete the establishment and collaboration of the Print Commodity Team, and issue an agencywide memorandum requiring reduced printing, reduced color printing, double-sided printing, and less desktop printing.”

Agency Response and OIG Evaluation

The agency concurred with Recommendation 3 and provided an estimated completion date of September 30, 2016.

For Recommendation 3, OARM stated it “will update milestones in MATS for recommendations in OIG Report 14-P-0388.” OARM, however, further commented that it “has been engaged in an agencywide paper reduction initiative that supports the agency’s goal of *Reducing EPA’s Environmental Footprint*

¹ We are not making any recommendations on this issue since this recommendation is being tracked under EPA OIG Report No. 14-P-0338.

through Sustainability Performance. In coordination with regional partners and program offices, the agency is developing streamlined agencywide procedures to reduce costs, reduce the use of paper and encourage sustainable business practices. Paper reduction is an integral part of the FY16 HPO Action Plan, which expands print management to paper reduction. The agency continues to make progress in strengthening its print management and its reduction of the use of paper and is looking forward to realizing these efficiencies.”

We agree with agency’s actions to update milestones in MATS for recommendations in OIG Report No. 14-P-0388. When implemented, the corrective actions will meet the intent of Recommendation 3. This recommendation will remain open pending completion of the proposed corrective action.

The complete agency response to the discussion draft is in Appendix A.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	7	Update the EPA's main authoritative guidance for printing operations (Printing Management Manual) to include authorization for decentralized operations within the regions	O	Assistant Administrator for Administration and Resources Management	9/30/17		
2	7	Issue guidance to EPA regions and program offices to reiterate roles and responsibilities to help reinforce the authority of the APO and to change behaviors. Guidance should specifically include procedures to facilitate the most efficient and economical methods for printing and inventory management.	O	Assistant Administrator for Administration and Resources Management	9/30/17		
3	11	Establish achievable milestones in MATS and complete corrective action to address the following recommendation identified in the August 2014 OIG report, <i>Increased Emphasis on Strategic Sourcing Can Result in Substantial Cost Savings for EPA</i> : "Complete the establishment and collaboration of the Print Commodity Team, and issue an agencywide memorandum requiring reduced printing, reduced color printing, double-sided printing, and less desktop printing."	O	Assistant Administrator for Administration and Resources Management	9/30/16		

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

Agency Response to Discussion Draft





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


FEB 22 2016

OFFICE OF
ADMINISTRATION
AND RESOURCES
MANAGEMENT

MEMORANDUM

SUBJECT: OARM Response to Draft OIG Project No. OA-FY15-0044: *Positioning EPA for the Digital Age Requires New Mindsets Toward Printing*

FROM:  Karl Brooks, Acting Assistant Administrator 

TO:  Kevin Christensen, Assistant Inspector General
Office of Audit
Office of the Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject discussion draft. The agency generally concurs with the three recommendations and has attached the corrective actions for these recommendations.

OARM has been engaged in an agencywide paper reduction initiative that supports the agency's goal of *Reducing EPA's Environmental Footprint through Sustainability Performance*. In coordination with regional partners and program offices, the agency is developing streamlined agencywide procedures to reduce costs, reduce the use of paper and encourage sustainable business practices. Paper reduction is an integral part of the FY16 HPO Action Plan, which expands print management to paper reduction.

The agency continues to make process in strengthening its print management and its reduction of the use of paper and is looking forward to realizing these efficiencies. If you have any questions regarding this response, please feel free to contact Vaughn Noga, Director, Office of

Administration at (202)564-8400 (recommendations 1 & 2) or John Bashista, Director, Office of Acquisition Management at (202) 546-4310 (recommendation 3).

Attachments

cc: Donna Vizian
John Showman
Joanne Amorosi
Brandon McDowell
Maryann Petrole
Steve Blankenship
Yvette Jackson
Gayle Jefferson
Raphael Jackson

AGENCY'S RESPONSE TO DRAFT AUDIT RECOMMENDATIONS

No.	Recommendation	Intended Corrective Actions	Estimated Completion by Quarter and FY
1	Updated the EPA's main authoritative guidance for printing operations (Printing Management Manual) to include authorization for decentralized operations within the regions.	Concur. OARM will update the Printing Management Manual. The updated manual will clearly outline US Code, Title 44, Section 501, Government Printing and Binding Regulations. The manual will provide guidance for printing nationwide.	Q4 FY2017
2	Issue guidance to EPA region and program offices to reiterate roles and responsibilities to help reinforce the authority of the Agency Printing Officer and to change behaviors. Guidance should specifically include procedures to facilitate the most efficient and economical methods for printing and inventory management.	Concur. OARM will update the agency Printing Management Manual to reiterate the roles and responsibilities of the Agency Printing Officer and the nationwide Printing Control Officers. It will also reflect the current practice of print on demand. Note: Warehouse operations are defined separately from printing operations. Currently, warehouse operations and inventory must be certified in writing annually by the Senior Resource Official to the Director of the Office of Administration. The certification ensures the facilities are assessed to ensure efficiency and identify cost saving opportunities.	Q4, FY2017
3	Establish realistic milestones in MATS to address the following recommendation identified in the August 2014 OIG Report, Increased Emphasis on Strategic Sourcing Can Result in Substantial Costs Savings for EPA: Complete the establishment and collaboration of the Print Commodity Team, and issue an agencywide memorandum requiring reduced printing, reduced color printing, double-sided printing, and less desktop printing.	Concur. OARM will update milestones in MATS for recommendations in OIG Report 14-P-0388. The rest will be addressed in our HPO Action item.	Q4, FY2016

Distribution

Office of the Administrator
Assistant Administrator for Administration and Resources Management
Agency Follow-Up Official (the CFO)
Agency Follow-Up Coordinator
General Counsel
Associate Administrator for Congressional and Intergovernmental Relations
Associate Administrator for Public Affairs
Principal Deputy Assistant Administrator, Office of Administration and Resources Management
Director, Office of Administration, Office of Administration and Resources Management
Director, Office of Acquisition Management, Office of Administration and
Resources Management
Director, Facilities Management and Services Division, Office of Administration and
Resources Management
Director, Office of Policy and Resource Management, Office of Administration and
Resources Management
Deputy Director, Office of Policy and Resource Management, Office of Administration and
Resources Management
Audit Follow-Up Coordinator, Office of Administration and Resources Management