



U.S. ENVIRONMENTAL PROTECTION AGENCY



OFFICE OF INSPECTOR GENERAL

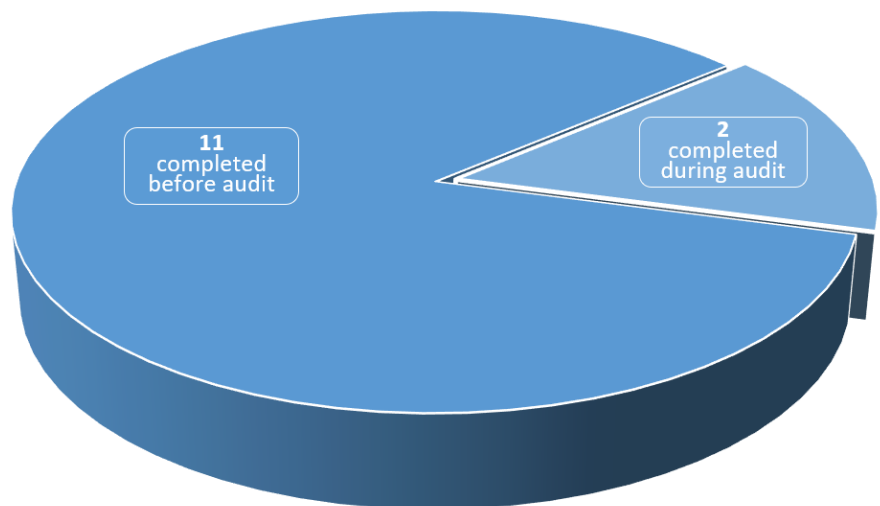
***Congressional Request and Hotline Report:
Operating Efficiently and Effectively***

Follow-Up Audit: EPA Took Steps to Improve Records Management

Report No. 19-P-0283

August 27, 2019

Status of OIG Audit Recommendations



Report Contributors:

Rudolph M. Brevard
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Abbreviations

AFC Audit Follow-Up Coordinator
CIO Chief Information Officer
EPA U.S. Environmental Protection Agency
FOIA Freedom of Information Act
NRMP National Records Management Program
OGC Office of General Counsel
OIG Office of Inspector General
OMB Office of Management and Budget

Cover Image: The graphic shows completed corrective actions for 13 of 13 audit recommendations related to the EPA’s records management and FOIA practices; 11 were completed before the audit and two were completed during the audit. (EPA OIG graphic)

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At a Glance

Why We Did This Project

The Office of Inspector General (OIG) performed this audit to determine whether the U.S. Environmental Protection Agency (EPA) took action to complete OIG recommendations regarding the preservation of email and text messages, and the improvement of the agency's Freedom of Information Act (FOIA) process. We followed up on actions the agency took to address the 13 recommendations from the following prior reports:

- 1) [No. 13-P-0433](#), *Congressionally Requested Inquiry Into the EPA's Use of Private and Alias Email Accounts*.
- 2) [No. 14-P-0262](#), *Briefing Report: Review of EPA's Process to Release Information Under the Freedom of Information Act*.
- 3) [No. 17-P-0062](#), *Congressionally Requested Audit: EPA Needs to Improve Processes for Preserving Text Messages as Federal Records*.

This report addresses the following:

- *Operating efficiently and effectively.*

Address inquiries to our public affairs office at (202) 566-2391 or [OIG WEBCOMMENTS@epa.oig](mailto:OIG_WEBCOMMENTS@epa.oig).

List of [OIG reports](#).

Follow-Up Audit: EPA Took Steps to Improve Records Management

What We Found

The EPA completed all corrective actions for 13 past audit recommendations related to its records management and FOIA practices. Two recommendations from Report No. 17-P-0062, *Congressionally Requested Audit: EPA Needs to Improve Processes for Preserving Text Messages as Federal Records*, with corrective action completion dates of September 30, 2018, were completed by the established milestone dates during our audit.

The EPA's FOIA guidance needs updating to comply with federal requirements.

In Report No. 14-P-0262, we recommended that the EPA create an agencywide FOIA policy and procedure. On September 30, 2014, the EPA's Chief Information Officer (CIO) issued agencywide directives in the form of a FOIA policy (CIO 2157.1) and a FOIA procedure (CIO 2157-P-01.1), which satisfied the intent of the original recommendation.

While the EPA completed corrective actions on all of the past recommendations, the FOIA statute changed in 2016 and the EPA updated its FOIA regulations in June 2019. Consequently, the EPA's FOIA policy and procedure again require management review to determine whether updates are needed.

Recommendation and Planned Agency Corrective Actions

We recommend in this report that the General Counsel issue an updated agency Freedom of Information Act policy and procedure. The agency agreed with the OIG's findings and recommendation. Management stated it updated the agency's FOIA regulations on June 26, 2019, and plans to issue a new FOIA policy and procedure. The agency provided us with December 5, 2019, as the planned completion date for issuing the FOIA policy and procedure updates. We consider the recommendation resolved with corrective actions pending.



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

OFFICE OF
INSPECTOR GENERAL

August 27, 2019

MEMORANDUM

SUBJECT: Follow-Up Audit: EPA Took Steps to Improve Records Management
Report No. 19-P-0283

FROM: Charles J. Sheehan, Deputy Inspector General

A handwritten signature in blue ink that reads "Charles J. Sheehan".

TO: Matthew Z. Leopold, General Counsel
Office of General Counsel

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). The project number for this audit was OA&E-FY18-0217. This report contains findings that describe the problems the OIG has identified and improvements the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The EPA's Office of General Counsel is responsible for the issues discussed in this report.

In accordance with EPA Manual 2750, your office provided acceptable corrective actions and milestone dates in response to the OIG recommendation. The recommendation is resolved and no final response to this report is required. However, if you submit a response, it will be posted on the OIG's 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.

We will post this report to our website at www.epa.gov/oig.

Table of Contents

Purpose.....	1
Background	1
Responsible Offices.....	2
Scope and Methodology	3
Results.....	4
Recommendation	5
EPA Response and OIG Evaluation	5
Status of Recommendations and Potential Monetary Benefits	6

Appendices

A Evaluation of EPA Corrective Actions for Selected OIG Reports	7
B Agency Response to Draft Report	14
C Distribution	16

Purpose

The Office of Inspector General (OIG) performed this audit to determine whether the U.S. Environmental Protection Agency (EPA) took action to complete OIG recommendations regarding the preservation of email and text messages, and the improvement of the agency's Freedom of Information Act (FOIA) process.

Background

We conducted this follow-up audit, in part, to address a congressional inquiry. The inquiry requested that the OIG review EPA practices for complying with legal standards for preserving certain electronic records as federal records and responding to FOIA requests for information. After the congressional inquiry, the OIG also received a hotline complaint involving the EPA's compliance with federal records requirements and FOIA.

The inquiry and complaint made allegations against the EPA Administrator's office in general and former EPA Administrator Scott Pruitt in particular. Since Mr. Pruitt left the agency during the preliminary stages of this audit, we did not review specific allegations made against him. Prior audits disclosed that weaknesses existed in EPA practices involving records management and electronic records preservation.

Our prior audits also noted that the EPA needed to take steps to strengthen its FOIA process. During fiscal years 2013 through 2017, the OIG issued three relevant audit reports with 13 recommendations (Table 1). These reports recommended that the EPA strengthen its preservation of electronic records and improve its records management and FOIA policy and procedure.

Table 1: EPA OIG reports and recommendations

EPA OIG report	Number of recommendations
No. 13-P-0433 , <i>Congressionally Requested Inquiry into the EPA's Use of Private and Alias Email Accounts</i> (September 26, 2013)	5
No. 14-P-0262 , <i>Briefing Report: Review of EPA's Process to Release Information Under the Freedom of Information Act</i> (May 16, 2014)	2
No. 17-P-0062 , <i>Congressionally Requested Audit: EPA Needs to Improve Processes for Preserving Text Messages as Federal Records</i> (December 21, 2016)	6
Total recommendations	13

Source: OIG analysis.

In response to our recommendations, EPA management provided corrective action plans with milestone dates for completing the associated actions.

After considering the congressional request and hotline complaint, we followed up with the EPA, which is responsible for completing corrective actions, as outlined in the following federal circulars and EPA manual:

- Office of Management and Budget (OMB) Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, dated July 15, 2016, states:

Correcting control deficiencies is an integral part of management accountability and must be considered a priority by the Agency. An Agency's ability to correct control deficiencies is an indicator of the strength of its internal control environment.

- OMB Circular A-50 Revised, *Audit Followup*, dated September 29, 1982, states:

Audit followup is an integral part of good management... Corrective action taken by management on resolved findings and recommendations is essential to improving the effectiveness and efficiency of Government operations.

- EPA Manual 2750, *Audit Management Procedures*, dated March 28, 2017, states:

The Agency Audit Follow-Up Official is responsible for:
a) Ensuring that agencywide audit management, resolution and follow-up policies and procedures are in place... [and]
b) Ensuring that audit reports are resolved promptly and implemented in a manner that satisfies requirements of statutes and agency regulations; ... [and] improves the efficiency and effectiveness of the programs.

Responsible Offices

The Office of General Counsel (OGC) manages the agency's responses to FOIA requests, develops and issues the agency's FOIA regulations and FOIA policy and procedure, and compiles the EPA's annual report of FOIA activity to the U.S. Department of Justice. The OGC is also responsible for the recommendations in this report because the office assumed responsibility for the agency's FOIA program on April 15, 2018.

In addition, the Office of Congressional and Intergovernmental Relations and the Office of Mission Support were responsible for the 13 past audit recommendations we followed up on during our audit.

The EPA Principal Deputy Associate Administrator for the Office of Congressional and Intergovernmental Relations is the action official designated to complete corrective actions related to EPA processes for responding to congressional requests for information.

The Office of Mission Support supports the National Records Management Program (NRMP), which provides leadership and direction for managing records that support the EPA’s mission. The agency’s Records Officer leads the NRMP in accordance with EPA policy and federal statutes and regulations.

Scope and Methodology

We conducted our audit from June 2018 through June 2019. We conducted this performance audit in accordance with generally accepted government auditing standards. 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.

We coordinated with the following EPA offices and action officials responsible for completing the corrective action plans for the 13 audit recommendations from the three EPA OIG reports followed up on during this audit (Table 2).

Table 2: Listing of EPA offices reviewed

EPA OIG report	Office/action official	Number of recommendations
No. 13-P-0433	Office of Mission Support	5
No. 14-P-0262	Office of General Counsel *	2
No. 17-P-0062	Deputy Administrator	1
	Office of Mission Support	5
Total number of recommendations		13

Source: OIG analysis.

* After the OIG issued Report No. 14-P-0262, the OGC assumed responsibility for the EPA’s FOIA program.

We met with EPA officials to discuss what steps the agency had taken to complete the corrective actions. We obtained documentation from EPA officials to confirm management had completed corrective actions. We also reviewed EPA policies and procedures for addressing records management, email records, text messages and FOIA. For recommendations that the EPA indicated it completed before we started the audit, we did not review whether management completed the planned actions by the established milestone dates.

We obtained corrective action plans from the agency for all three prior audits. For Report No. 17-P-0062, we researched the status of corrective actions for two

recommendations that were not completed before the start of this follow-up audit, within the agency's Management Audit Tracking System.

We considered a corrective action completed if EPA officials provided documentation to substantiate completion of all steps for the planned corrective actions. We did not consider a corrective action completed if management could not provide all relevant documentation to support that the corrective action was completed.

For corrective actions that we considered as either "not complete" or "pending further action," we summarized our understanding of management's progress in completing the corrective actions and provided the summary to EPA officials for comment.

Results

The EPA completed all the corrective actions for the 13 audit recommendations related to its records management and FOIA practices. See Appendix A for the detailed status of each audit recommendation.

In Report No. 14-P-0262, we recommended that the EPA create an agencywide FOIA policy and procedure. The original planned completion date was September 30, 2014. On September 30, 2014, the EPA's Chief Information Officer (CIO) issued agencywide directives in the form of a FOIA policy (CIO 2157.1) and a FOIA procedure (CIO 2157-P-01.1). This satisfied the intent of the original recommendation.

However, the agency's FOIA policy and procedure had a review date of September 30, 2017, to determine whether updates are needed. According to agency personnel, the review was not completed due to a change in the FOIA program's responsible office. Neither the Office of Mission Support (the originally responsible office) nor the OGC (the newly appointed responsible office) completed the required review to the policy and procedure.

We presented our findings to the EPA regarding the need for the policy and procedure to be updated. The OGC provided us with a February 15, 2019, memorandum that reaffirmed the 2014 FOIA policy and procedure were required to be updated. The February 15, 2019, memorandum, also issued guidance from the OGC on the FOIA Improvement Act of 2016 and stated that the OGC was developing changes to the agency's FOIA regulations. The OGC indicated that once the updated FOIA regulations take effect, the EPA's National FOIA Office would fully review and revise the agency's current FOIA policy and procedure. Subsequent to issuance of our draft report, the EPA published its finalized FOIA regulations.¹

¹ 84 Fed. Reg. 30028 (Jun. 26, 2019).

It is still incumbent upon management to follow through with its plans to issue an updated agency FOIA policy and procedure so EPA employees know the correct process to follow. Keeping policies and procedures current is a major component of an effective internal control program. As such, the EPA's ability to respond correctly to FOIA requests could be hampered by not updating the associated policy and procedure for compliance with the FOIA statute amended in 2016.

Recommendation

We recommend that the General Counsel:

1. Issue an updated agency Freedom of Information Act policy and procedure.

EPA Response and OIG Evaluation

We originally recommended in this report that the OGC complete its review and update of the agency's FOIA regulations and then issue an updated EPA FOIA policy and procedure. The agency agreed with the OIG's findings and recommendation. Management stated it updated the agency's FOIA regulations as of June 26, 2019, and posted the new regulations on the agency's FOIA website. As a result, we modified our recommendation to reflect the OGC's remaining corrective action to issue an updated agency FOIA policy and procedure. Following distribution of its response memo, the agency provided us with December 5, 2019, as the planned completion date for issuing the FOIA policy and procedure updates. We consider the recommendation resolved with corrective actions pending. The agency's complete response is at Appendix B.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS

Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Potential Monetary Benefits (in \$000s)
1	5	Issue an updated agency Freedom of Information Act policy and procedure.	R	General Counsel	12/5/19	

¹ C = Corrective action completed.
 R = Recommendation resolved with corrective action pending.
 U = Recommendation unresolved with resolution efforts in progress.

Evaluation of EPA Corrective Actions for Selected OIG Reports

Recommendation	Corrective action	OIG evaluation
<i>Report – Congressionally Requested Audit: EPA Needs to Improve Processes for Preserving Text Messages as Federal Records (Report No. 17-P-0062), issued 12/21/2016.</i>		
1	<p>Agency’s CA Response Developed procedures for responding to congressional requests for records. Planned completion date September 20, 2017.</p>	Completed.
2	<p>Agency’s CA Response Completion date was the day the training was due for the Agency.</p>	Completed.

Recommendation		Corrective action	OIG evaluation
3	Determine whether potential text message records were lost during the replacement of the noted mobile device during the instance where the senior official could not provide the requested text messages (Page 12, Bullet 1), or during the instance when the senior official's mobile device automatically deleted messages after 30 days (Page 12, Bullet 2), and notify the National Archives and Records Administration if warranted. (OEI) ²	Agency's CA Response CA 1-1: The Agency's Records Officer reviewed the reports and determined that there was no evidence of a potential loss of text messages that were records in either case and that a report of unauthorized destruction to NARA ³ was not required. The Office of General Counsel agreed with this conclusion.	Completed.
4	Develop and implement a strategy instructing employees not to change the text message retention settings. (OEI)	Agency's CA Response EPA will modify the Mobile Device Employee Notice to state that employees shall not modify the text message retention settings.	Completed.

² The OEI abbreviation refers to the EPA's former Office of Environmental Information; that office is now part of the Office of Mission Support.

³ NARA means the National Archives and Records Administration.

Recommendation		Corrective action	OIG evaluation
5	Develop a plan to replace any phones not technically compatible with the new mobile device management solution identified during market research in response to Recommendation 6. Also, develop a process to approve waivers for any office that identifies a significant business need to keep the existing device and identifies an alternative solution for records management for that existing device. (OEI)	<p>Agency's CA Response</p> <p>Proposed Alternative Recommendation: If the Agency identifies a records-management solution for mobile devices after the review scheduled to be conducted between 6/30/18, and no later than 9/30/18, develop a plan to replace any phones not technically compatible with any identified solution within 6 months of implementation of the identified solution.</p>	Completed.
6	Formalize a plan with milestone dates to conduct market research to determine whether an enterprise mobile device management solution can manage text message communications to help the agency meet its record-keeping responsibilities. Document a management decision if a new solution is appropriate for the implementation and, if needed, create a project plan with milestone dates for implementing the new solution. (OEI)	<p>Agency's CA Response</p> <p>OEI is in the process of researching text message tools and will complete this new research no sooner than 6/30/18, and no later than 9/30/2018.</p>	Completed.

Recommendation		Corrective action with completion date	OIG evaluation
<i>Report – Briefing Report: Review of EPA’s Process to Release Information Under the Freedom of Information Act (Report No. 14-P-0262), issued May 16, 2014.</i>			
1	Issue the final agency FOIA procedures by September 30, 2014. (OEI)	Agency’s CA Response Former Acting Assistant Administrator and Chief Information Officer, Renee P. Wynn, issued the final Agency FOIA procedures on September 30, 2014. The Agency’s final FOIA procedures are posted on the Agency’s intranet.	Completed.
2	Require that Senior Information Officials at each region and program office certify that their local FOIA procedures are consistent with the agency’s final procedures by March 31, 2015. (OEI)	Agency’s CA Response The audit corrective action completion date was extended by OEI from March 31, 2015 to September 30, 2015. On June 25, 2015, OEI provided copies of the attached certifications from each SIO ⁴ to the OIG.	Completed.

⁴ The SIO abbreviation means Senior Information Official.

Recommendation		Corrective action with completion date	OIG evaluation
<i>Report – Congressionally Requested Inquiry into the EPA’s Use of Private and Alias Email Accounts (Report No. 13-P-0433), issued 9/26/2013)</i>			
1	Develop and implement records management policies and procedures regarding the use of private email accounts when conducting official government business. (OEI)	<p>Agency’s CA Response OEI issued Interim Records Management Policy CIO 2155.2, June 28, 2013, which address the use of private email accounts when conducting official business.</p> <p>OEI issued Records Management Policy CIO-2155-3, February 10, 2015, which addresses the use of private email accounts when conducting official government business.</p>	Completed.
2	Develop internal controls to ensure that all EPA employees and contractors complete training on their records management responsibilities. (OEI)	<p>Agency’s CA Response OEI Conducted mandatory records management training for all EPA staff, contractors and grantees.</p> <p>A Mass mailer announcement was sent out on July 31, 2013.</p>	Completed.
3	Develop and implement internal controls to monitor and track completion of training for personnel with specific delegated duties and responsibilities outlined in the NRMP guidance. (OEI)	<p>Agency’s CA Response Records Liaison Officer (RLOs) have been required to obtain the National Archives and Records Administration (NARA) Certification in Federal Records Management since 2008. RLOs are regularly reminded of this requirement. Completion of this training by RLOs is tracked by the Agency Records Officer through NARA and information received from the RLOs. On November 17, 2014, the Acting Principal Deputy Assistant Administrator and Deputy Chief Information Officer notified the SIOs, IMOs⁵ and RLOs on the status of each RLOs’ NARA training. An annual reminder and status will be sent out.</p>	Completed.

⁵ The IMO abbreviation means Information Management Officer.

Recommendation		Corrective action with completion date	OIG evaluation
4	Conduct outreach with all EPA offices to ensure that locally developed separation policies and procedures, as well as the associated employee separation checklist, include records management retention practices consistent with agency guidance. (OEI) This should include ensuring that:		
4a	Locations' out-processing procedures contain practices where notifications are sent to individuals with records management responsibilities in a timely manner to aid in capturing electronic records from separating employees. (OEI)	Agency's CA Response The National Records Management Program (NRMP) and OARM's Office of Human Resources (OHR) collaborated to issue the Employee Separation Checklist (EPA Form 3110-1), which requires that all employees identify and transfer Agency records. The Procedures for Preservation of Separating/Transferring and Separated Personnel's Records in accordance with the Federal Records Act (CIO 2155-P-04.0) and the accompanying EPA Records Management Checklist for Separating/Transferring or Separated Personnel, EPA Form 3110-49 were issued on December 23, 2014.	Completed.
4b	Locations include steps to have employees search for potential records residing within alias email accounts that the employee manages or on other electronic media devices within the employee's control. (OEI)	Agency's CA Response In the new records checklist (3110-49), all separating employees must provide information on records in multiple locations including private/personal or secondary email accounts, PDAs, local network drives, etc. was complete on December 23, 2014.	Completed.
4c	Locations have special out-processing procedures that contain a method for collecting records from departing employees during the holiday season or times of limited staffing. (OEI)	Agency's CA Response The procedures for Preservation of Separating/Transferring and Separated Personnel's Records in accordance with the Federal Records Act and the accompanying EPA Form 3110-49, EPA Records Management Checklist for Separating/Transferring or Separated Personnel, ensures that separating employee's records can be captured during the holiday season and other times when there is limited staffing, by allowing an alternate or designee to review and sign the form. Completed on December 23, 2014. Agency's Planned Completion Date 12/31/13	Completed.

Recommendation		Corrective action with completion date	OIG evaluation
4d	Locations update their locally developed out-processing checklist to ensure an area exists for where records managers can note their records management certifications as required by agency policy. (OEI)	<p>Agency's CA Response EPA Form 3110-49 includes an area that must be certified by the employee, supervisor, IMO and RLO, indicating that the records of the employee have been reviewed and transferred, as required. Completed December 23, 2014.</p> <p>Agency's Planned Completion Date 12/31/13</p>	Completed.
5	Establish a revised date for when the EPA will implement an electronic content management tool to capture email records within the agency's new email system. (OEI)	<p>Agency's CA Response EZ Email Records for Lotus Notes deployed September 2013, EZ Email records for MS Office deployed November 2013. A Mass mailer was sent out 11/25/13 announcing launch of tools and related mandatory training.</p> <p>Agency's Planned Completion Date 12/31/13</p>	Completed.

Agency Response to Draft Report



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 12 2019

OFFICE OF
GENERAL COUNSEL

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report, OA&E-FY18-0217, *EPA's Processes for Preserving Emails and Text Messages, and Responding to Freedom of Information Act Requests*"

FROM: Elise Packard *EBP/TRE*
Deputy General Counsel for Operations
Office of General Counsel

TO: Rudolph M. Brevard, Director
Information Resources Management Directorate
Office of Audit and Evaluation

Thank you for the opportunity to comment on the Draft Report OA&E-FY18-0217, "*EPA's Processes for Preserving Emails and Text Messages, and Responding to Freedom of Information Act Requests*".

The Office of General Counsel concurs with OIG's conclusion that EPA completed all corrective action for the 13 audit recommendations related to records management and Freedom of Information Act (FOIA) practices. Due to events subsequent to EPA's completion of all corrective actions relative to OIG Briefing Report No. 14-P-0262, it has now become time for EPA to review and update EPA's FOIA Policy and FOIA Procedures.

As the Agency's Chief FOIA Officer described in a February 15, 2019 letter to you, EPA signed a FOIA Policy and Procedure Update in February 2019. That update confirmed the continued applicability of EPA's FOIA Policy and EPA's FOIA Procedures. The letter also advised you that EPA was planning to update EPA's FOIA regulations. We agree with you that "it is incumbent upon management to complete its update of the FOIA regulation" and, in fact, EPA published its updated FOIA regulations on June 26, 2019, conforming the regulations to the 2007, 2009, and 2016 statutory amendments. As a result, it has now become timely for EPA to review EPA's FOIA Policy and FOIA Procedures, which it is now undertaking. I want to thank you for meeting with my team and staff from the Office of Mission Support during this process and for the opportunity to respond.

If you have any questions, please contact Timothy Epp at 202-564-2830 or epp.timothy@epa.gov.

cc: Vaughn Noga
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