Agency Response to OIG Report 20-P-0173
Further Efforts Needed to Uphold Scientific Integrity at EPA Action Plan

OIG Recommendation #1
Determine the extent and cause of the culture and "tone at the top" concerns, based on indicators from the OIG's scientific integrity survey. Issue the results to all EPA staff and make available to the public.

EPA Response: High-Level Intended Corrective Action
The EPA Chief Scientist, Scientific Integrity Official (SIO) and the Scientific Integrity Committee will analyze the OIG scientific integrity survey, together with previous surveys of EPA, EVS results, FMFIA reports, and reports of alleged violations of EPA Scientific Integrity Policy to derive a list of scientific integrity concerns and work with the Administrator to devise an action plan to address them.

1. DETERMINE THE CAUSE AND EXTENT OF THE CULTURE AND TONE AT THE TOP

EPA regularly surveys employees to assess our culture of scientific integrity and the steps we are taking to enhance it. Preliminary analysis of our current survey[1] revealed that 56% (1495 employees) of respondents reported dissatisfaction with EPA's culture of scientific integrity over calendar years 2019 and 2020. When asked to rate characteristics related to a culture of scientific integrity, 46% (1036) responded that transparency of decision making was poor, and 53.4% (1168 employees) responded that independence of scientific conclusions from policy Implications was poor. Fifty-six percent (1249 employees) somewhat or strongly disagreed that they were able to do their work protected from intimidation or coercion. When asked about the greatest obstacles to achieving a culture of scientific integrity the most cited reason was political interference followed by industry interference, and then fear of retaliation. When asked about which of the following would be most useful for enhancing the culture of scientific integrity at EPA the most cited was greater accountability for decision makers, followed by clear guidance about the science policy interface, and then clear guidance about what constituted inappropriate influence on science, ways to meet deadlines without a loss of scientific rigor and respect for differing scientific opinions by managers. Respondents were asked to consider calendar years 2019-2020 in answering these questions.

From initial survey results and our experience over nearly 10 years of implementing the scientific integrity policy, we know that enhancing EPA's culture of scientific integrity will require making sure scientific integrity is visible through regular and explicit expressions of support for scientific integrity including expectations that EPA will operate accordingly. Essential elements include scientific integrity training, having robust mechanisms in place that protect and maintain our culture of scientific integrity through leadership at all levels, increasing transparency across the board, and addressing violations of the scientific integrity policy when they occur.

2. ACTIONS TO SAFEGUARD SCIENTIFIC INTEGRITY AND ENHANCE EPA's CULTURE OF SCIENTIFIC INTEGRITY

[1] https://www.epa.gov/scientific-integrity/epa-2021-scientific-integrity-survey

GOAL 1 – EPA Employees are Aware of our Scientific Integrity Policy and their responsibilities to uphold scientific integrity.

i. Ongoing and occurred in FY21:
   1. Annual Message from the EPA Administrator or Deputy Administrator to the Agency reenforcing their commitment to scientific integrity and including clear examples of unacceptable scientific integrity behavior
   2. Remarks by the Administrator or Deputy Administrator at the scientific integrity Annual Meeting
   3. Annual briefing for each Deputy Assistant Administrator and Deputy Regional Administrator by the SIO and the corresponding Deputy SIO on scientific integrity, any allegations or advice queries and any other scientific integrity issues or concerns.

ii. Past practice to be implemented annually:
   1. Annual Report briefing for Administrator and Deputy Administrator by the SIO

iii. New:
   1. Annual presentation by SIO to Executive Management Council (EMC). The EMC is comprised of career deputies to address management strategy, policy, guidance, and implementation issues across the regions and programs.

iv. Update scientific integrity Policy as required by the scientific integrity executive memo[2]

GOAL 2 - Institutionalize Robust Mechanisms to Protect Scientific Integrity at EPA and Ensure EPA's Leaders Continue to Uphold and Further Consider Scientific Integrity in Decision Making

i. Explore ways to institutionalize scientific integrity at EPA and bring in additional external expertise for advice and comment.
ii. Assess and institutionalize the Action Development Process (ADP) to provide transparency and establish barriers to inappropriate interference.
iii. Develop and, where appropriate, implement scientific integrity controls and documentation for regulatory decisions.
iv. Continue to engage with the OIG in its role to address research misconduct.
v. Devise a way to ensure that differing scientific opinions are indeed "reflected in the Agency's deliberative documents for the policy makers' consideration" as EPA's Scientific Integrity Policy requires.
vi. Add a scientific integrity sub-element to USA Performance for use in all SES/ST/SL PARS.
vii. Work with EPA's Human Resource Professionals to track reports of incidents of scientific integrity related retaliation, retribution, and reprisals, take concrete steps to encourage reporting, and make summary statistics publicly available that include whether the report was substantiated or not.

3. ISSUE THE RESULTS TO EPA AND THE PUBLIC

The Agency will convey these actions to the Agency and the public in the following ways:

[2] https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policymaking/

- Inclusion of these actions and progress on their implementation on the Agency's website, issuance of an Agency Mass Mailer (March 14, 2022[3]) and including all these actions prominently in the Scientific Integrity Annual Report.

[3] "Our Commitment to Scientific Integrity" Mass Mailer, March 14, 2022. https://work.epa.gov/mass-mailers/our-commitment-scientific-integrity