



Office of Inspector General
Report of Audit

**EPA'S ADMINISTRATION OF
INTERGOVERNMENTAL PERSONNEL ACT
ASSIGNMENTS**

**Audit Report No.
E1MMG4-13-0064-5400052**

March 30, 1995

**INSPECTOR GENERAL DIVISION
CONDUCTING THE AUDIT:**

**Special Projects and Reviews
Staff**

PROGRAM OFFICE INVOLVED:

**Office of Human Resources
& Organizational Services**



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

MAR 30 1995

OFFICE OF
THE INSPECTOR GENERAL

MEMORANDUM

SUBJECT: EPA's Administration of Intergovernmental
Personnel Act Assignments
Audit Report No. EIMMG4-13-0064-5400052

FROM: Kenneth A. Konz *Kenneth A. Konz*
Acting Deputy Inspector General (2421)

TO: Jonathan Z. Cannon
Assistant Administrator for Administration
and Resources Management (3101)

Attached is our audit report on "EPA's Administration of Intergovernmental Personnel Act Assignments." Generally, we found that EPA's IPA program has met the intent of the Act and the program as a whole has been beneficial to the environmental community. However, this report identifies that management controls over individual IPA assignments need improvement, and makes recommendations to correct these problems.

We appreciate the positive response by the Office of Human Resources and Organizational Services to our report recommendations and the actions your staff have initiated to strengthen the IPA program. My staff is available to help in whatever way we can as you develop and implement corrective actions to our recommendations.

ACTION REQUIRED

In accordance with EPA Order 2750, you as action official are required to provide us, within 90 days, a report on the actions the Agency has taken as a result of our recommendations. If your proposed actions will not be complete at the time of your response, we ask that you describe the actions that are ongoing and provide milestones and completion dates for those actions.

Should you or your staff have questions or desire to further discuss the issues raised in the report, please contact Gordon Milbourn, Director, Special Projects and Reviews Staff, on 260-7784.

Attachment



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EPA'S ADMINISTRATION OF IPA ASSIGNMENTS

EXECUTIVE SUMMARY

OBJECTIVES

The objectives of this audit were to determine whether: (a) the Intergovernmental Personnel Act (IPA) program at EPA met the intent of the Act; and (b) controls over the program were sufficient.

BACKGROUND

IPAs are temporary assignments of Federal personnel to eligible non-Federal organizations (such as State and local governments, institutions of higher education, Indian Tribal governments, and other nonprofit organizations) and vice versa. IPA assignments are implemented via an agreement between the participating organizations and the employee. IPA assignments are to be of mutual concern and benefit to the organizations involved, and participating Federal employees are to return to Federal service upon completion of the assignments.

PRINCIPAL FINDINGS

EPA Could Better Maximize Its Return And Minimize Its Investment In The IPA Program

Generally, EPA's IPA program has met the intent of the Act. Most assignments were mutually beneficial to the parties involved. Payments were accurate and supported for almost all of the IPA assignments which we reviewed. Most assignees met the eligibility criteria, and the majority of Federal assignees returned to Federal service. We concluded that the program has not only benefited EPA, but the environmental community as a whole.

However, management controls over individual assignments need improvement. We found at least one problem with 96 of the 160 IPA assignments reviewed. For 43 out of 160 agreements, totaling \$5.5 million, the Agency paid all of the costs, even though the benefits were mutual or predominantly accruing to the non-Federal organization. Twenty-three of the assignees did not, or do not plan to, return to their home organizations after their IPAs. Seven assignees in our sample were not eligible for participation in the IPA program.

Several IPA assignments had multiple problems, which were indicative of program abuse. For some agreements, we questioned the intent and cost of the assignment, the benefit to the Agency,

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and sometimes even the eligibility of the assignee. These multiple abuses most frequently involved IPA assignments of senior Agency officials (SES and GM/GS-15 employees) authorized primarily at the Assistant Administrator level or higher. Because the expense to the Agency is greater at the higher grade levels, we would expect the benefits to be greater. There should be greater likelihood that the employee will return to the Agency, not less. Finally, and most importantly, there should be more scrutiny by Office of Human Resources and Organizational Services (OHROS) officials to ensure that EPA is getting its money's worth. The multiple problems that we have cited indicate that just the opposite may be true. Moreover, in our view, the IPA mechanism was being used in these cases specifically for the convenience and benefit of the employees or to "farm out" unwanted employees.

The problems which we found were primarily due to inadequate internal controls or not adhering to controls in place. In our view, the cause for assignments with multiple problems and excessive costs was the hesitancy of OHROS officials to say "no" to EPA's most senior managers.

Region 9 IPA Assignments Create Unique Problems

Region 9 represents what is best and worst about the IPA program. Its senior managers actively promote the program and are aggressive in pursuing new IPA assignments and allowing their employees the opportunity to participate in the program. Many top managers and supervisors in the Region have had IPA assignments themselves. The program is seen as a stepping stone, enriching the employees' experience and enhancing their promotion potential in the Region.

However, Region 9 also has some serious problems associated with its IPA program--problems which we did not find in any other part of the Agency. Region 9 has developed a blanket IPA agreement, prepared at the beginning of the fiscal year, which is later accompanied by an addendum for each individual employee. We found blanket agreements and addendums to be incomplete and certain required certifications invalid, all of which contributed to the below problems.

EPA augmented its travel appropriations using blanket IPA agreements. We found several cases where EPA employees assigned through blanket IPAs were performing a portion of their EPA duties and functions while being paid salaries and/or the majority of travel expenses with grant funds. This has allowed Region 9 to preserve its own travel funds for other uses.

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Region 9 created conflict of interest situations using blanket IPA agreements. Some project officers (POs) charged with grant oversight responsibilities subsequently acted, while on IPA assignments, as employees of the grantee for which they were POs. Consequently, monitoring and oversight functions could not be objective or independent, since POs were now in the position of having to make determinations about the need for and adequacy of work that they themselves performed.

Region 9 has also augmented State staff on a long-term basis at significant cost using IPA agreements. At any given time over the last five years, from 7 to 11 full-time EPA employees have been serving on IPA assignments to the State of Hawaii. If the State had hired permanent staff, grant funds totaling over \$250,000 used to support IPA travel could have been redirected to environmental protection.

RECOMMENDATIONS

We recommend that the Assistant Administrator for Administration and Resources Management: (a) review the decision to centralize the IPA program function under a national coordinator; (b) develop and apply management controls which will justify costs and maximize benefits especially for those to EPA on agreements involving senior managers; (c) terminate ongoing agreements that do not meet the provisions of the Act; (d) develop internal controls to ensure assignments meet the intent, cost, eligibility, service obligations, etc., required by the Act; (e) update the IPA Policy and Procedure Manual and Handbook as necessary; (f) eliminate use of or modify existing blanket IPA agreements; (g) prohibit project officers from participating in IPA assignments funded by grants they oversee and monitor; and (h) receive assurances that the State of Hawaii is making every effort to fill its vacancies before entering into future IPA assignments.

AGENCY COMMENTS AND OIG EVALUATION

Generally, the Agency agreed with the report and that management controls can be improved. While formal written comments were not received in response to the draft report, we incorporated oral comments received at the exit conference in the body of the final report.

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EPA'S ADMINISTRATION OF IPA ASSIGNMENTS

CHAPTER 1

INTRODUCTION

OBJECTIVES

The objectives of this audit were to determine whether: (a) the Intergovernmental Personnel Act (IPA) program at EPA met the intent of the Act; and (b) controls over the program were sufficient.

BACKGROUND

Title IV of the Intergovernmental Personnel Act (P.L. 91-648) authorizes Federal agency heads to approve the temporary assignment of their personnel to eligible non-Federal organizations (such as State and local governments, institutions of higher education, Indian tribal governments, and other nonprofit organizations) and vice versa. IPA assignments are implemented via an agreement between the participating organizations and the employee. The Act and its implementing regulations require: the assignments to be of mutual concern and benefit to the organizations involved; participation to be restricted to permanent full-time or part-time employees; and participating Federal employees to return to Federal service upon completion of the assignments.

By Executive Order 11589 of April 1971, as amended, the President delegated authority to the Office of Personnel Management (OPM) for issuing regulations on the IPA program. OPM's Federal Personnel Manual (FPM), Chapter 334, applicable at the time most assignments in our sample were initiated, provided guidance in implementing the IPA program. In 1994, Chapter 334 of the FPM was abolished. However, the Public Law and its legislative history, United States Code (U.S.C.), Code of Federal Regulations (CFR), and Agency policy, procedures, and guidance continue to outline the criteria consistent with the abolished FPM regarding IPA assignments.

It is Agency policy to utilize the IPA program to the maximum extent possible. For example, EPA's July 1994 Five-Year Strategic plan seeks to promote partnership among EPA staff and other groups by increasing IPA assignment opportunities to foster and sustain employee learning and growth. Historically, EPA is among the most active Federal agencies in the use of IPA assignments. As of September 1994, the EPA IPA universe

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consisted of 1,029 assignments dating back to 1984, including 134 active assignments.

The IPA program has been delegated from the Assistant Administrator for Administration and Resources Management to the Director, Office of Human Resources and Organizational Services (OHROS). The Director, OHROS has responsibility for developing policies and procedures and directing assignments of employees under the Act. These duties have been further delegated to the OHROS IPA Coordinator. The IPA Coordinator's responsibilities include: reviewing all assignments for regulatory compliance; advising and assisting in preparing IPA assignments; and maintaining complete IPA files. Regional Human Resources and Personnel Offices are responsible for participating in negotiating and preparing the IPA assignments and ensuring that the necessary documents are submitted to the IPA Coordinator for concurrence and approval. In 1989, OHROS issued an IPA Policy and Procedures Manual (IPA Manual) and an IPA Handbook which established policies and procedures governing IPA assignments.

SCOPE AND METHODOLOGY

The audit was conducted from September 1994 to February 1995, at EPA Headquarters, Washington DC; Region 9 in San Francisco, CA; Region 4 in Atlanta, GA; and the Cincinnati Financial Management Center (CFMC) in Cincinnati, OH. To accomplish our objectives, we: (a) examined 160 judgementally selected IPA assignments (see Appendix I), primarily those having activity in fiscal 1994 and those which were 100 percent funded by EPA in fiscal 1993 and 1994; (b) reviewed cost information of selected IPAs; (c) reviewed Federal and EPA policies, procedures, and guidance regarding IPA assignments; and (d) retrieved and analyzed payroll and personnel information. We reviewed OHROS Federal Managers' Financial Integrity Act (Integrity Act) fiscal 1993 and 1994 internal control documentation. We interviewed personnel, finance, and program officials and sought guidance and legal interpretations from the Office of General Counsel (OGC). We also contacted assignment participants, and Federal and non-Federal supervisors of IPA assignees, as necessary.

We conducted this audit in accordance with the 1988 Government Auditing Standards issued by the Comptroller General of the United States. Our audit included tests of management and related internal controls, policies, standards, and procedures specifically related to the audit objectives.

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CHAPTER 2

EPA COULD BETTER MAXIMIZE ITS RETURN AND MINIMIZE ITS INVESTMENT IN THE IPA PROGRAM

Generally, EPA's IPA program has met the intent of the Act. Most assignments were mutually beneficial to the parties involved. Payments were accurate and supported for almost all of the IPA assignments which we reviewed. Most assignees met the eligibility criteria, and the majority of Federal assignees returned to Federal service. Region 9 has been particularly supportive of the program, and has encouraged widespread use of IPA assignments. We concluded that the program has not only benefited EPA, but the environmental community as a whole. Examples of beneficial assignments include:

- a regional environmental engineer assigned to a State to further the development and implementation of the State Superfund program.
- a Headquarters attorney assigned to a university to advise on environmental justice/equity issues and develop an environmental curriculum for primarily minority institutions of higher education.
- a regional environmental protection specialist assigned to a university to develop state-of-the-art procedures and techniques to directly measure the extent of an organism's exposure to selected environmental pollutants.
- a regional environmental engineer assigned to a State to develop a partnership among Federal, State, and local agencies for environmental management.
- a research professor assigned to EPA to develop scientific tools and expertise for conducting regional multiple resources assessments.
- a professor assigned to EPA to conduct statistical evaluations of automobile emission standards and Superfund expenditures and transactions costs.

However, while the program as a whole has been beneficial, management controls over individual assignments need improvement. We found at least one problem with 96 of the 160 IPA assignments reviewed. Several assignments had multiple problems, leading us to conclude in some instances that the IPA mechanism was being

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used more for the convenience and benefit of the employees than the organizations, or to "farm out" unwanted employees. Appendix II categorizes the 96 problems which we identified. Each category is explained below.

QUESTIONABLE COSTS

Cost Sharing Arrangements

Federal agencies may pay all, some, or none of the assignment costs. However, FPM section 1-5 and EPA's IPA Manual, Chapter 1 indicate that the organization benefiting the most from the assignment, which is usually the borrowing organization, should absorb the largest share of the cost. EPA's IPA Handbook states "...where benefits are primarily on one side, that organization can pay all costs.... In most assignments of EPA employees to other organizations, it is expected that EPA's cost share should be 50 percent or less." Further, the CFR 334.106 and EPA's IPA Manual, Chapter 1 state:

...where EPA pays more than 50 percent of salary costs involving an EPA employee and the period exceeds 6 months, the Agency must document the rationale for the cost sharing arrangement in the assignment agreement.

For 43 out of 160 agreements, totaling \$5.5 million, the Agency paid a greater share of the costs than the benefits warranted. For 30 of those 43 agreements, EPA paid all of the costs, even though the Federal employee was assigned to the non-Federal organization, and the non-Federal organization was either the principal beneficiary or benefits were mutual. No rationale or insufficient rationale was provided in the files as to why EPA paid all salary and fringe benefits. Thirteen of the 43 IPA assignments were of non-Federal employees to EPA where the Agency paid 100 percent of the costs, even though the non-Federal organization received some benefit. Again, there was no documentation justifying the absence of cost sharing. At the exit conference, OHROS officials stated that they have requested further justification for active IPAs, and will require stronger justification for future IPA assignments.

Billing and Payment Problems

We reviewed 39 IPA agreements in our sample serviced by CFMC and Region 9, for receivable and payable accuracy and evidence of supporting documentation. We found that collections and payments were being made consistent with the agreements and fiscal policy

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and procedures for 33 of the 39 IPAs reviewed. However, in six cases we found exceptions totaling \$9,070 of unbilled costs, and \$120,187 of costs not supported by documentation (see Appendix III). When we described these six cases to CFMC officials, they promptly took actions which satisfied our concerns.

IPA ASSIGNEES NOT RETURNING TO THEIR "HOME" ORGANIZATIONS

U.S.C. Section 3372(c)(1) and EPA's IPA Manual Chapter 1, Section 11 state that an employee of the Federal agency may participate in an IPA assignment only if the employee agrees, as a condition of accepting the assignment, to serve in the civil service upon the completion of the assignment for a period equal to the length of the assignment. In the event that employee fails to carry out the agreement (except for good and sufficient reason, as determined by the head of the Federal agency from which assigned) the employee shall be liable to the United States for payment of all expenses (excluding salary) of the assignment. EPA's IPA Manual also indicates that upon request, the Director, OHROS, may waive these expenses and service requirements, but the requests must justify the reason for such a waiver.

EPA's IPA Manual, Chapter 3 Section (1) states EPA officials should not attempt to hire, on a permanent basis, employees assigned to them through an IPA, and that the IPA program is not intended to be used as a mechanism for career changes.

We found 23 of the assignees did not, or do not plan to, return to their home organizations after their IPAs. These included assignees who either retired or planned to retire, or who resigned. There was no evidence in these files that OHROS asked for or received requests for waiver of their Federal service obligation, nor is there any indication that recovery of costs was pursued or considered. Consequently, the "home" organization may never receive any benefit of the expertise presumably acquired on the IPA assignment. During the exit conference, Agency officials agreed to implement procedures to strengthen controls over employees failing to meet their service obligation.

Employees Who Retired or Plan to Retire

Eight assignees retired or plan to retire after their IPA assignments, even though they had agreed to return to Federal service upon completion of their assignments. For example, assignment HQ-316-92-94N sent a Senior Executive Service (SES) employee to George Mason University in Fairfax, VA. The

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assignment was fully funded by EPA. The employee accepted a buyout and retired from government service in December 1994, after completing more than two years in the IPA program. Another two year assignment, HQ-313-93-95N, ended in January 1995, and the assignee (also an SES employee) accepted a buyout in March 1995 and also retired from Federal service.

Allowing employees to participate in the IPA program when they are retirement-eligible at the time the assignment begins, or will be retirement-eligible upon program completion, increases the likelihood that the Agency will not receive the full benefit envisioned under the Act. EPA should minimize this risk by developing specific controls for employees in this category. For instance, the Agency could require the gaining organization to fully fund the assignment, or it could require that participants be able to fulfill their Federal service obligation before they become retirement-eligible.

Employees Who Resigned

Fifteen employees (seven Federal, eight non-Federal) resigned from their home organizations at the completion of their IPA assignments, even though the Federal employees had agreed to serve like periods of Federal service after their IPA assignments.

For instance, HQ-288-90-94E assigned an EPA employee to the Oregon Department of Environmental Quality (DEQ) for a four year period. Although the agreement stated that the assignee would return to the Agency, other language in the agreement, not normally included in IPA agreements, suggested that the assignee did not intend to return to EPA. The agreement stated, "In the event that the employee accepts a position with the DEQ, and EPA seeks reimbursement of travel and relocation costs; DEQ will reimburse EPA...." After the assignment, the assignee accepted a position with the DEQ; however, EPA never attempted to recover the travel and relocation costs.

Assignees 09-159-92-94E, HQ-322-93-95N, HQ-330-93-94N, 10-082-93-94N and HQ-187-89-93E were non-Federal employees on IPAs to EPA. Most agreements indicated that they would return to their non-Federal organizations at the end of their assignments. Despite the IPA Manual's caution against attempting to hire employees assigned to them through an IPA, these employees are now EPA employees and work in the same EPA offices that they were assigned to when on their IPAs.

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EPA puts the program at risk if it does not ensure that it receives the mutual benefit envisioned by the Act. Without the Federal employees returning, EPA cannot justify costs totaling \$2.3 million to fund these assignments. Under these circumstances, the Agency leaves itself open to criticism that it is wasting government funds. Similarly, the non-Federal organizations do not receive the mutual benefit envisioned by the Act, and EPA is weakening the program by hiring assignees into EPA.

INELIGIBLE ASSIGNMENTS

U.S.C. Section 3372 and EPA's IPA Manual, Chapter 1, Section (7) exclude certain categories of employees from participation in the IPA program. This includes Federal employees holding the following types of appointments: time-limited, temporary, term, non-career or limited SES, and Schedule C. It also includes employees that are not full-time permanent employees of non-Federal organizations. The rationale for the exclusion is that the home organization is less likely to benefit from the assignment due to the temporary nature of the person's employment.

Participants of Questionable Eligibility

Seven assignees in our sample were not eligible for participation in the IPA program. In another 26 cases we could not determine the eligibility status.

For example, to be eligible for assignment HQ-289-92-94E, a non-career SES employee was converted to an "administratively determined" (AD) appointment in 1992. The employee was then allowed to enter the IPA program. To be eligible for assignment HQ-303-92-93N, an excepted-limited appointment employee was also converted to an AD appointment in 1992, and then participated in the IPA program. EPA paid 100 percent of the cost of these assignments.

OHROS has interpreted language in the Act and enabling legislation to allow ADs to participate in the IPA program, the rationale being that these employees are serving on "indefinite," rather than time-limited appointments. We strongly disagree with this interpretation. ADs serve "at the pleasure" of the Administrator, and appointment termination may come at any time. With a change in Administration from Republican to Democratic in 1992, it was virtually assured that the new EPA Administrator would request the resignation of these AD employees on IPA

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assignments. This did, in fact, occur, and thus there was absolutely no opportunity for the Agency to benefit from these assignments. Furthermore, one of the assignees accepted a position at the National Trust for Historic Preservation, where he had been working on his IPA. The IPA program was not created to facilitate career changes, as previously discussed.

Given the circumstances, we believe OHROS disregarded the intent of the Act in order to "game the system." The benefits received by the non-Federal organization and IPA assignees themselves far outweighed the benefits to EPA. In effect, these employees received full compensation from EPA to search for new employment. We believe that EPA wasted the over \$190,000 spent on these IPA assignments. OHROS officials advised us that they will consider not allowing employees with AD status to participate in the IPA program and will improve eligibility screening for participation in the program.

Other ineligible assignments included HQ-299-92-94W and HQ-279-91-93N. Assignees were from the National Environmental Technology Applications Corporation (NETAC) to EPA. These assignees were not permanent employees of NETAC, and had no return rights to that organization. In a prior special review report,¹ we recommended, and the Agency agreed, to terminate these assignments.

We could not determine the eligibility status of 26 assignees under blanket IPAs initiated in Region 9. Employment status was not listed on the agreement or the addendum. Since this information was not available in official IPA files, the IPA Coordinator either did not adequately review assignments for eligibility, or did not require adequate documentation to be maintained in the files. In January 1995, Region 9 and OHROS provided documentation to us certifying that all the employees under the IPA blanket authority were eligible to participate under the program. OHROS officials stated that their proposed changes to the blanket agreement process, discussed in the next Chapter, should eliminate this condition from recurring.

¹ "Misuse of Resources in the Office of Cooperative Environmental Management," report no. E6EMG3-13-2055-3400094, dated September 30, 1993.

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IPA Assignments of Excessive Duration

CFR 334.104 and EPA's IPA Manual, Chapter 1, Section (9)(d) indicate that under no circumstances may an assignment extend beyond four years. However, assignments HQ-227-91-93N and HQ-227-90-95E from two universities to EPA covered five or more consecutive years. In fact, one of the assignment files indicated that the assignee "will have served four years on the IPA by 9/91. NO MORE EXTENSIONS WILL BE APPROVED." This assignee is still active on an IPA scheduled to terminate in September 1995. OHROS officials agreed to terminate these assignments.

MULTIPLE PROBLEMS INDICATE PROGRAM ABUSE

In reviewing IPA files, we found that some files contained multiple problems. Examples include the following.

Assignment HQ-316-92-94N was the SES official assigned to George Mason University. The agreement stated the assignment was to:

...investigate opportunities to establish environmental financing as a core component for the Institute's courses in the Environmental Sciences, and to identify ways to bring the issue of environmental financing to the forefront of debate within the Academic community....

Information provided by the University indicated that the assignee taught one course a semester and participated in program administration and research. EPA paid 100 percent of this employee's salary and benefits for two years--amounting to over \$200,000. Because the employee did not return to the Agency, the benefits to the Agency have been reduced, and the Agency's ability to justify the cost is also reduced.

Assignment HQ-289-92-94E was the previously mentioned AD appointee (and former non-career SES) assigned to the National Trust for Historic Preservation. The agreement narrative did not substantially support EPA's mission. The assignment involved the surface transportation law and its potential impacts on the built and natural environments; and the implementation of rural development studies as it relates to historic preservation. The primary beneficiaries of this assignment were the employee, the National Trust, and the Department of Transportation. As previously discussed, we believe the employee's status made him

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ineligible to participate in the IPA program. EPA paid 100 percent of salary and benefits for over a year, which amounted to more than \$100,000. The employee did not return to the Agency, and, again, the benefits to EPA did not warrant the costs.

Assignment HQ-335-94-96N involved a former SES employee assigned to the Association of State and Territorial Public Health Laboratory Directors (ASTPHLD). The IPA agreement obligated EPA to pay 100 percent of the assignee's salary and benefits. In August 1994, six months after the assignment was initiated, the IPA agreement was amended, placing all payment responsibilities on ASTPHLD. At the same time ASTPHLD was awarded a cooperative agreement (CX-823650-01-0) for \$211,000, which included payment for the assignee's salary and benefits. A waiver was granted to allow ASTPHLD to claim costs incurred prior to the date of the cooperative agreement. However, the scope and purpose of the IPA assignment using the cooperative agreement were not altered from the original IPA agreement scope. While funding IPA assignments through cooperative agreements is generally permissible, initiating a cooperative agreement for this sole purpose is highly questionable and certainly wasteful. Paying this employee's salary and benefits directly cost the Agency approximately \$130,000. Funding the employee through this cooperative agreement adds indirect costs, travel, and supplies. We do not believe the Agency can justify \$80,000 in additional cost for the same service. Moreover, at the end of the IPA assignment, the employee will be eligible to retire from the government.

HQ-244-91-93N was the former Director of the Office of Cooperative Environmental Management (OCEN). His assignment was developed to relieve a potentially uncomfortable work situation relating to selecting someone else for the SES position of OCEN Director. When the initial IPA assignment to a non-profit organization ended, the assignee contacted another nonprofit organization and made arrangements for a second IPA assignment. OCEN fully-funded both assignments, even though OCEN managers did not expect this individual to return to OCEN (in fact, the employee is now working at the Department of State). EPA subsequently terminated this assignment as a result of an OIG special review report.²

² "Misuse of Resources in the Office of Cooperative Environmental Management," report no. E6EMG-13-2055-3400094, dated September 30, 1993.

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The multiple problems involved with each of these assignments are indicative of IPA program abuse. The Agency has paid and continues to pay for senior officials (the above examples involve SES and GM/GS-15 employees authorized primarily at the Assistant Administrator level or higher) to bring back and share new experiences and perspectives. This has not consistently occurred. Because the expense to the Agency is greater at the higher grade levels, we would expect the benefits to be greater. There should be greater likelihood that the employee will return to the Agency, not less. Finally, and most importantly, there should be more scrutiny by OHROS officials to ensure that EPA is getting its money's worth. The multiple problems that we have cited indicate that just the opposite may be true. Moreover, in our view, the IPA mechanism was being used in the above cases specifically for the convenience and benefit of the employees or to "farm out" unwanted employees.

OHROS is responsible for safeguarding the IPA program from abuse. Inadequate controls over the program jeopardize the entire program, when, as we stated at the outset, the majority of the assignments that we looked at had merit and obvious benefit to the Agency. At the exit conference, OHROS indicated that they would design a cost/benefit justification form with specific tangible and intangible criteria guidelines for agreements and revise the IPA Manual, as necessary.

IPA PROGRAM INEQUITIES

Excessive Travel Paid Without Adequate Justification

OPM's FPM, Chapter 334, Section 1-7 (b) and EPA's IPA Manual, Chapter 1, Section (11) indicate the Agency may pay for either relocation expenses to and from the assignment location or a per diem allowance at the assignment location. The cost to the government should be a major factor in determining the approach to be used. Both manuals also state that per diem allowance at the assignment location is intended for short-term assignments of less than one year and not for longer assignments. The FPM also indicates that per diem allowances should not be paid for more than one year. In our sample, we found two IPA assignees who had received a total of \$86,380 and \$82,861, respectively, in per diem expenses for assignments lasting well beyond the one year guideline.

Assignment HQ-268-91-93N, a SES employee assigned to Clark Atlanta University, contained provisions that the assignee

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receive \$90 a day in a negotiated per diem over a two year period. A cost justification was provided in the file for the first two years. An extension was granted on the IPA assignment which included per diem for an additional two years (ending in August 1995); however, the cost justification was not performed for the third and fourth year. Per diem received since the assignment initiation totaled \$86,380 as of September 1994, with one year still to go on the assignment. An OHROS official indicated this amount was paid because the policy states that it "should be" less than one year, but did not "have to be."

Assignment HQ-285-91-93N sent a professor from the University of Kansas to EPA Headquarters and made EPA responsible for all travel and transportation expenses to, from, and during the one year assignment. The assignment was subsequently extended for an additional two years. The assignee received \$82,861 over a three year period and there was no cost justification on file.

In our opinion, the years of per diem paid under both agreements were excessive. Furthermore, there was insufficient evidence in the file for OHROS to justify that the method used was the most cost-effective. If OHROS does not consistently apply per diem constraints, then EPA not only runs the risk of being criticized for inequitable treatment of its employees, but the cost of the IPA assignments could also increase to the point where they can no longer be justified. At the exit conference, OHROS officials agreed to require a cost analysis for all assignments that involve Agency funding, either per diem or relocation expenses, and revise the IPA Manual as necessary.

Inconsistent Application of Locality Pay

There is no definitive Federal or EPA criteria on how to treat locality pay for IPA assignments. EPA Headquarters' approach is to compute locality pay based on the permanent duty station location. On the other hand, Region 9 policy is to use the permanent duty station as a basis for short-term assignments, and the temporary duty station for long-term assignments. Since the approaches differ, locality pay for IPA assignments was not being paid in a consistent, equitable manner. At the exit conference, OHROS agreed to prepare a consistent policy regarding locality pay.

OVERSIGHT AND ADMINISTRATION NEED IMPROVEMENT

EPA Directive 1200 formally delegated the IPA program to the Assistant Administrator for Administration and Resources

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Management. From there it is re-delegated to the Director, Office of Administration, to other EPA offices and to the Director, OHROS. The Director, OHROS further delegated the program to the OHROS IPA Coordinator. The delegation language includes the authority "to approve IPA agreements pursuant to the provisions of Chapter 33, 5 U.S.C."

When the IPA Coordinator role was envisioned,³ it was meant to be a central control point to monitor the program in an objective and independent manner and to ensure the purpose of the Act was met. We do not believe that the Coordinator function, as it currently exists, meets this intent.

The IPA Coordinator told us her staff gives advice, strongly recommends changes on IPA agreements, and makes adjustments in cases of blatant regulation violations. However, she said she has never turned down an IPA agreement, and she does not believe she has this authority. Most funding decisions are based on the program office's willingness to pay for its employee. For example, a program office was willing to pay for four years of per diem while its employee was on IPA assignment; therefore, the Coordinator approved the arrangement.

Many of the problems which we have detailed in this chapter and the one that follows were caused either by inadequate internal controls or not adhering to controls in place. OHROS had not performed Integrity Act or other reviews of the IPA program, which could have identified these weaknesses. Some policies and procedures need clarification, and the IPA Coordinator indicated that the IPA Manual needed to be updated. OHROS officials informed us that they are currently in the process of updating it. In addition, OHROS officials indicated at the exit conference that the IPA Coordinator role will be further clarified to include the authority to take corrective actions as necessary.

Furthermore, EPA's IPA Manual requires annual progress reports from the assignee, final assignment reports from the assignee's supervisor, and annual written reviews from the program offices. These reports should contain an assessment of the assignment, accomplishments, and mutual benefits achieved or expected, upon completion of the assignment. These evaluations should be a very important part of the oversight process and also could be used as additional support to justify IPA assignment extensions and cost

³ "Management of the Intergovernmental Personnel Act Program," report no. Elh01-11-0013-11371, dated July 29, 1981.

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sharing arrangements. However, 88 percent of the Headquarters files we reviewed did not contain these annual progress reports, nor were the other reports prepared. During the audit, OHROS issued a memorandum reminding Human Resources Officers and IPA contact persons to submit these reports to the IPA Coordinator. OHROS officials plan further controls to monitor these progress report and evaluation submissions.

More IPA assignments in our sample, 53 of the 160, originated in Region 9 than in any other region. Yet OHROS had neither visited the Region to review any assignments (citing lack of travel funds), nor had they discovered any of the problems when approving Region 9 assignments which we identified in this report.

We were told by OHROS officials that they did not have sufficient resources assigned to the IPA program to perform effective oversight. The IPA Coordinator duty is one of several major duties assigned to one individual. One other OHROS employee works part-time on the IPA program. Travel funds have not been available for this function. Without adequate resources, centralization of the function does not accomplish its goal. Instead of adding consistency to the program, increasing the benefits to the Agency, and ensuring that EPA's IPA assignments meet the intent of the Act, the function as it now exists has merely added an ineffective layer to the bureaucratic process.

While not establishing or adhering to adequate internal controls can be the cause for many of the assignments having one, or sometimes two, of the problems described above, we do not believe this is the only cause for those assignments having multiple problems. In our opinion, an additional reason why these assignments and costs were allowed was the hesitancy of OHROS officials to say "no" to EPA's most senior managers. The IPA Coordinator told us that she saw her role as one of facilitating the actions requested by program offices within the framework of IPA program requirements. She did not believe she had the authority to turn down assignments or the EPA share of financing.

For the examples that we detailed above, EPA's costs were high. The Agency paid 100 percent of the salaries and benefits of these GM/GS-15 and SES employees. Based on a review of the IPA file or discussions with the non-Federal organizations, the gaining organizations and the employees were the principal beneficiaries of the assignments. EPA did not receive the benefit it could have expected, because several of these employees did not returned to the Agency upon completion of their assignments. These assignments were also authorized by the highest levels of

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EPA management (primarily at the Assistant Administrator level or higher). We believe that the Delegations Manual gives the IPA Coordinator the authority to disapprove these type of assignments; however, we recognize her reluctance to do so after the Deputy or Assistant Administrator has concurred.

Nevertheless, OHROS is charged with safeguarding the integrity of the IPA program. Therefore, we suggest that for those few assignments involving senior Agency officials, OHROS apply all management controls at its disposal. These could include: requiring additional justification; participating in cost sharing negotiations; limiting assignments to one year, with extensions granted based on written performance evaluations detailing the benefits accruing to the Agency; and seeking independent review and concurrence by the Office of General Counsel. OHROS risks sacrificing the entire IPA program if it authorizes assignments that do not meet the intent of the Act, or if it cannot justify the costs of these assignments to Congress and the taxpayers.

RECOMMENDATIONS

We recommend the Assistant Administrator for Administration and Resources Management:

- 2-1. Review the decision to centralize the IPA program function under a national coordinator. If management determines that budgetary and manpower constraints will not permit effective coordination and oversight, decentralize the function. If national coordination is determined to be necessary for the success of the program, clarify the role of the IPA Coordinator in the IPA Manual to include the authority to disapprove assignments, terminate assignments, or take other corrective actions, as necessary.
- 2-2. Notify receiving organizations and EPA employees on IPA assignments that assignments will be terminated if required progress reports and evaluations are not submitted. Terminate assignments not meeting this requirement. Do not extend any assignment without current evaluations in the IPA file, and use those evaluations to determine and justify the benefit of the assignment to EPA.
- 2-3. Develop procedures to eliminate IPA program inequities, especially the per diem and locality pay issues discussed in this report.

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- 2-4. Enforce provisions of the Federal regulations and the IPA agreement which allow EPA to seek monetary restitution of all EPA-paid expenses, such as per diem and relocation, from employees failing to meet their Federal service obligation.
- 2-5. For assignments involving senior Agency officials (GM/GS-15 and above), develop and apply additional management controls which will justify the high costs and maximize benefits to EPA.
- 2-6. Carefully review and document that EPA's financial participation in future IPA assignments is commensurate with the benefits to be received.
- 2-7. Develop internal controls, such as an assignment review checklist or a second level of review, to ensure IPA assignees are screened for eligibility. Terminate current IPA assignments having ineligible participants.
- 2-8. Develop controls which will discourage program officials from converting non-Federal employees assigned to them on IPAs into permanent Federal employees holding the same position.
- 2-9. Develop controls which will minimize the risk of employees not fulfilling their Federal service obligation. Give special consideration to adding additional controls for those employees who will be retirement-eligible upon completion of their IPA assignments.
- 2-10. Adhere to current EPA and Federal regulations which require that in instances where EPA pays more than 50 percent of salary costs involving an EPA employee and the period exceeds 6 months, the Agency must document the rationale for the cost sharing arrangement in the assignment agreement.
- 2-11. Do not grant IPA agreements for more than four consecutive years. Terminate ongoing assignments where this condition exists.
- 2-12. Seek an OGC for an opinion as to the legality of using a grant for the sole purpose of funding an IPA assignment.
- 2-13. Once internal controls have been strengthened, update the IPA Policy and Procedures Manual and Handbook as needed.

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CHAPTER 3

REGION 9 IPA ASSIGNMENTS CREATE UNIQUE PROBLEMS

Region 9 represents what is best and worst about the IPA program. Its senior managers actively promote the program and are aggressive in pursuing new IPA assignments and allowing their employees the opportunity to participate in the program. Many top managers and supervisors in the Region have had IPA assignments themselves. The program is seen as a stepping stone, enriching the employees' experience and enhancing their promotion potential in the Region.

Unfortunately, Region 9 also has some serious problems associated with its IPA program--problems which we did not find in any other part of the Agency. For the Region to truly represent the IPA model, EPA needs to take aggressive and immediate steps to address the following issues.

BLANKET AGREEMENTS QUESTIONABLE

An IPA is an agreement which establishes the respective obligations of the IPA assignee, the receiving organization, and the home organization. The IPA agreement and its provisions are set up with a specific assignee already identified prior to the execution of the agreement. However, Region 9 has developed a blanket IPA agreement, prepared at the beginning of the fiscal year, which is later accompanied by an addendum for each individual employee. Region 9 Policy on Intermittent Blanket Intergovernmental Personnel Act Assignments, dated June 13, 1994, was approved by Region 9's Human Resources Management Branch and Comptroller, but not by EPA's Regional Counsel or General Counsel. Region 9 personnel have stated that using blanket agreements saves time for the States or territories involved, in that they do not have to concur on each individual assignment.

We found 17 blanket agreements involving 26 assignments to be incomplete and certain required certifications invalid. For instance, we reviewed IPA blanket agreement 09-179-93-94N (dated July 1, 1993) and an addendum (dated April 29, 1994). At the onset of the agreement, the individual listed on the addendum was not known. Nevertheless, Part 10 on conflict of interest was checked off in July 1993 and indicated that "applicable federal, state and local conflict of interest laws have been reviewed with the employee." This statement could not be accurate, since the

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IPA employee was not known at the time the blanket agreement was established. Part 15 on certifications of approving officials was signed by the EPA and the Republic of Palau in June and July of 1993. The language stated that "In signing this agreement, we certify that the description of duties and responsibilities is current and fully and accurately describes those of the assigned employee." Again, since the assigned employee had not been identified at the time the agreement was signed, her specific duties and responsibilities could not be identified except in the most general terms, making the certifications invalid. Further, the blanket IPA agreement and addendum were incomplete and vague regarding Part 4 on eligibility, Part 7 on position description, and Part 9 on fiscal obligations and applicable percentages.

Use of blanket IPAs in Region 9 has increased the risk that employees assigned may not be eligible for the program, and may be performing inappropriate functions. OHROS and Region 9 have sacrificed quality control for speed to the detriment of the program as a whole. OHROS agreed to implement stricter controls and procedures over the blanket agreement process.

Use of the blankets agreements probably caused, and certainly prevented Headquarters reviewers from detecting, the following two problems.

IPA Assignments To Perform Federal Functions

31 U.S.C. Sections 6301-6308 prohibits the use of grants for the direct benefit and use of the Federal government. Further, Region 9 policy on Intermittent Blanket IPA assignments states, "IPA assignments MAY NOT be used to carry out EPA responsibilities such as grant negotiations or program review or evaluation." We found several cases where EPA employees assigned through blanket IPAs were performing a portion of their EPA duties and functions while being paid (salaries and/or the majority of travel expenses) with grant funds. This has allowed Region 9 to preserve its own travel funds for other uses, thus augmenting its travel appropriation.

For example, under blanket agreements 09-186-93-94N to American Samoa and 09-180-93-94N Guam, one EPA employee performed duties involving the assessment of the status of environmental programs for these outer Pacific Islands. A portion of travel and salaries were paid by the gaining office through their consolidated grants from EPA. However, these duties overlap with the assignee's EPA function, to assess the performance in implementing the environmental programs of the Pacific Territories.

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Another assignee under blanket 09-186-93-94N had duties which included assessing the status of the grant program and performing on-site evaluations of the program. Salaries and the majority of travel expenses were paid under the consolidated grant. Again, these duties are the assignee's EPA functions which are prohibited from being carried out using an IPA and grant funds.

Assignment 09-195-94-94N duties included assisting the State in developing a wellhead protection program. During an interview, the assignee indicated that the functions performed on the IPA assignment (i.e., administration of the wellhead protection program) were Federal duties, and will continue to be until the State establishes a program. The assignee further mentioned that she was unaware that these duties could not be performed while on the IPA assignment.

OHROS agreed to establish procedures to ensure that duties performed on all IPA assignments are not EPA-mandated functions.

Conflicts of Interest

In 5 CFR Part 2635.101 it states that "an employee shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards...." We found four IPA assignments which have created conflicts of interest.

Specifically, some project officers (POs) charged with grant oversight responsibilities subsequently acted, while on IPA assignments, as employees of the grantee for which they were POs. Consequently, monitoring and oversight functions cannot be objective or independent, since POs are now in the position of having to make determinations about the need for and adequacy of work that they themselves performed.

One Region 9 employee's responsibilities included acting as a PO for the consolidated grant M009063-94-1 to Guam. One of the PO's duties was to approve the grant and workplan, which included approval of intermittent IPA assignments. During the grant period, IPA assignment 09-180-93-94N was arranged for the PO to assist Guam in developing a grant proposal and discussing progress and problems in meeting grant objectives. The PO's salary and travel were paid by the grantee, and the assignee acted as a representative of Guam during the IPA assignment period. After the IPA assignment, the PO returned to oversee and monitor the grant.

In another case, a Region 9 employee was the PO for grant D009384-94-0 to Hawaii. The PO was involved in preparing grant

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authorizing documents, approving the grant and workplan, and certifying that IPA funds were available. During the grant period, the PO went on intermittent IPA assignment 09-160-92-94E which included performing State functions paid under the grant. Subsequent to the IPA, the employee resumed the PO responsibilities.

We found similar examples involving grant A-009372-94-0 and IPA assignment 09-192-94-96N, and grant I-009394-94-0 and assignment 09-195-94-94N.

We believe that the above arrangements put EPA employees in conflict of interest situations. Assigning POs to work as employees of the grantee which they are monitoring compromises their integrity and independence. This in turn compromises the Agency's ability to provide effective monitoring and oversight of how its grant monies are being spent.

In our sample of 160 IPA assignments, we found conflict of interest situations and performance of Federal duties using grant funds primarily in those assignments involving blanket agreements. The blanket mechanism has necessitated broad function statements, rather than a detailed description of a particular assignee's duties. The conflict of interest discussion, which the organizations sign before they know the employees to be assigned, may or may not occur. Blanket agreements may have reduced the IPA processing time in Region 9, but they have also reduced the effectiveness of internal controls and management oversight. Region 9, through the use of intermittent assignments under blanket IPAs, has systematically augmented its travel appropriations, misused grant funds, and compromised its ability to ensure that grant funds are spent appropriately.

IPA ASSIGNMENTS AUGMENTING STATE STAFF ON A LONG-TERM BASIS

The objective of the IPA is to make it feasible and simple to move people for short periods of time when this movement can serve a sound public purpose. However, the program was not intended to be a means to meet State manpower needs.

Since 1978, EPA has sent IPAs to Hawaii to develop environmental programs. At any given time over the last five years, from 7 to 11 full-time EPA employees have been serving on IPA assignments to the State. We estimate that the 9 IPA assignments to Hawaii in fiscal 1994 have cost \$701,800, which includes salaries,

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benefits, and cost of living allowances. Travel estimates for permanent change of station (PCS) and temporary duty (TDY) for these employees total \$255,513. If the State had hired permanent staff, grant funds totaling over \$250,000 used to support IPA travel could have been redirected to environmental protection.

Region 9 officials have given us a variety of reasons why continued IPA assignments are necessary. They say that low State salaries do not encourage qualified personnel to apply for these positions and that the hiring process used by the State is lengthy; consequently, the positions remain vacant for long periods of time. Without IPA support some programs would be drastically reduced or be ineffective.

While we take no exception to the purpose of the IPA assignments in Hawaii, we believe that these assignments have allowed the State to augment its staff on a long-term basis at a significant cost to EPA. Hawaii needs to obtain competent staff to replace the continuous IPA assignees. In our opinion, the easy access to IPA assignees has contributed to the status quo and lack of urgency on the State's part to replace these individuals with its own staff. EPA officials indicated that the State recently obtained the authority to hire new staff, and that they will keep discussions regarding the intent of the recommendation in the forefront of State-EPA relations.

CONTROLS OVER REGIONAL IPA ASSIGNMENTS ARE INADEQUATE

Region 9 officials actively promote the IPA program and are aggressive in pursuing new IPA assignments. Regional personnel contended that use of the blanket agreements promotes streamlining, builds capacity, and encourages State participation.

However, we believe that the benefits were achieved at the expense of adequate internal controls over the IPA program. The blanket agreements were not reviewed for legality or completeness. Integrity Act or other oversight reviews were not performed by Headquarters or the Region and therefore, conflict of interest situations and the augmentation of EPA travel funds were not discovered. Region 9 Human Resources officials told us that they had never turned an IPA assignment down, and none were ever sent back from Headquarters. Further, augmenting Hawaii's environmental programs through IPAs has been costly and not a good long-term solution.

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All of these problems subject Region 9 and its employees to unnecessary risk and exposure to criticism, which can ultimately diminish the effectiveness and credibility of the IPA program. If adequate controls were integrated into the process, many of these reported problems would have been minimized or avoided.

RECOMMENDATIONS

We recommend the Assistant Administrator for Administration and Resources Management:

- 3-1. Eliminate blanket agreements or modify them so that they are consistent with IPA policies and procedures provisions including conflict of interest statements, certifications, position description, financial obligation, etc. If the choice is to modify, request an OGC review to ensure that the revised blankets meet IPA requirements.
- 3-2. Review all current Region 9 IPA assignments. Ensure that EPA-mandated functions are not performed while on these IPA assignments.
- 3-3. Prohibit project officers from participating in IPA assignments funded by grants they oversee and monitor.
- 3-4. Receive assurances that the State of Hawaii is making every effort to fill its vacancies before entering into future IPA assignments.

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IPA AGREEMENTS REVIEWED⁴

HQ-336-94-95N	HQ-288-92-94E
HQ-334-94-95N	HQ-292-92-93N
HQ-313-93-95N	HQ-349-94-95N
HQ-339-94-96N	HQ-335-94-96N
HQ-241-91-94E	HQ-303-92-93N
HQ-272-91-94E	HQ-308-92-94N
HQ-347-94-96N	HQ-309-92-93E
HQ-123-87-90E	HQ-268-91-95E
HQ-255-91-93N	HQ-312-93-94N
HQ-319-93-93N	HQ-342-94-94M
HQ-329-93-94N	HQ-285-91-93N
HQ-226-90-92N	HQ-344-94-95N
HQ-348-94-96N	HQ-091-85-86N
HQ-311-93-94N	HQ-337-94-95N
HQ-304-92-93N	HQ-345-94-95N
HQ-244-91-93N	HQ-343-94-95N
HQ-325-93-94N	HQ-289-92-94E
HQ-299-92-94N	HQ-330-93-94N
HQ-313-92-93N	HQ-245-91-94E
HQ-315-93-94N	HQ-186-89-93E
HQ-288-90-94E	HQ-187-89-93E
HQ-271-91-93N	HQ-295-92-94N
HQ-302-92-93E	HQ-346-94-94N
HQ-332-93-95N	HQ-279-91-93N
HQ-273-91-93N	HQ-131-87-93E
HQ-227-90-95E	HQ-333-94-96N
HQ-338-94-96N	HQ-316-92-94N
LV-070-94-96N	LV-056-90-94E
LV-068-92-93N	LV-059-91-95E
LV-061-91-95E	
NC-116-93-94N	NC-086-90-94E
NC-121-94-96N	NC-097-91-93E
NC-120-94-95N	NC-114-93-93N
NC-119-94-95N	
CI-061-93-93N	CI-071-92-93N

⁴ We reviewed 151 agreements which included 160 assignments. Blanket agreements cover more than one assignee.

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IPA AGREEMENTS REVIEWED

10-079-93-95E
10-078-91-94E
10-082-93-94N
10-072-91-94E
10-069-91-94E

10-083-93-94N
10-074-92-95E
10-078-92-94E
10-086-94-95N

09-144-92-94E
09-176-93-94N
09-201-94-95N
09-159-92-94E
09-179-93-94N
09-174-93-93N
09-193-93-94N
09-167-92-93N
09-198-94-94N
09-203-94-95N
09-179-93-95E
09-189-93-94N
09-153-92-94E
09-131-91-95E
09-160-92-94E
09-191-94-95N
09-189-93-94N
09-186-93-95ME
09-194-94-94N
09-065-87-90E
09-156-92-92N
09-095-88-92E

09-197-94-94N
09-180-93-94N
09-202-94-96N
09-190-93-94N
09-131-91-94E
09-142-91-94E
09-186-93-94N
09-182-93-94N
09-143-92-94E
09-196-94-94N
09-196-94-95E
09-178-93-94N
09-138-90-94E
09-186-93-95N
09-195-94-94N
09-199-93-94N
09-207-94-94N
09-034-84-86E
09-118-89-93E
09-062-86-90E
09-192-94-96N
09-208-94-95N

08-043-92-94E
08-035-91-93E

08-042-92-94E
08-032-92-94M

07-004-93-95N

06-016-94-95N
06-018-93-94E

06-014-94-95N
06-015-94-94N

05-041-93-94N
05-042-94-95N
05-040-93-94E

05-038-93-94N
05-043-94-95N

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IPA AGREEMENTS REVIEWED

04-071-94-96N
04-060-92-94N
04-074-94-96N
04-061-92-94N
04-067-93-95N
04-062-92-94N

04-072-94-94N
04-059-92-94N
04-066-93-95N
04-040-89-93E
04-048-90-94E
04-073-94-96N

03-047-93-94N

02-040-90-94E

02-047-94-96N

01-036-91-95E

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IPA ASSIGNMENTS BY PROBLEM CATEGORY

NO.	IPA ASSIGNMENT	A	B	C	D	E	F	G
1	06-016-94-95N	1						
2	09-201-94-95N							1
3	09-159-92-94E		1					
4	HQ-313-93-95N	1	1					
5	LV-070-94-96N	1						
6	HQ-349-94-95N	1						
7	HQ-335-94-96N				1			
8	HQ-241-91-94E							1
9	04-074-94-96N	1						
10	09-189-93-94N					1		
11	HQ-347-94-96N	1						
12	04-061-92-94N	1						
13	01-036-91-95E	1						
14	04-067-93-95N	1						
15	04-048-90-94E	1	1					
16	HQ-325-93-94N	1						
17	HQ-299-92-94N	2		1				
18	10-079-93-95E	1						
19	HQ-330-93-94N		1					
20	10-082-93-94N		1	1				
21	03-047-93-94N	1	1	1				

Problem category legend listed on page 5 of this Appendix.

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IPA ASSIGNMENT BY PROBLEM CATEGORY

NO.	IPA ASSIGNMENT	A	B	C	D	E	F	G
22	10-078-92-94E		1					
23	HQ-187-89-93E	1	1					
24	09-196-94-94N			1			1	
25	05-043-94-95N	1						
26	08-032-92-94M		1					
27	05-040-93-94E		1					
28	09-191-94-95N							1
29	09-199-93-94N			1			1	
30	09-189-93-94N							1
31	09-207-94-94N			1			1	
32	HQ-333-94-96N	1						
33	10-086-94-95N	1						
34	09-192-94-96N							1
35	HQ-316-92-94N	1	1		1			
36	10-069-91-94E		1					
37	04-066-93-95N	1	1					
38	09-180-93-94N			1			1	
39	HQ-292-92-93N	1						
40	04-059-92-94N	1						
41	09-197-94-94N			1			1	
42	08-042-92-94E		1					
43	09-190-93-94N			1			1	

Problem category legend listed on page 5 of this Appendix.

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IPA ASSIGNMENTS BY PROBLEM CATEGORY

NO.	IPA ASSIGNMENT	A	B	C	D	E	F	G
44	NC-086-90-94E	1	1					
45	09-193-93-94N			1			1	
46	09-186-93-94N			1			1	
47	HQ-303-92-93N	1		1				
48	08-035-91-93E	1						
49	09-180-93-94N			1			1	
50	09-167-92-93N			1			1	
51	HQ-268-91-95E	1				2		
52	04-040-89-93E	1		1				
53	HQ-319-93-93N	1						
54	HQ-329-93-94N		1					
55	HQ-285-91-93N	1				1		
56	HQ-304-92-93N	1						
57	HQ-344-94-95N	1						
58	HQ--091-85-86N	1						
59	HQ-244-91-93N	1			1			
60	HQ-289-92-94E	1		1	1			
61	HQ-313-92-93N	1						
62	HQ-186-89-93E	1	1					
63	HQ-288-90-94E	1	1					
64	HQ-271-91-93N	1	1					
65	HQ-295-92-94N	1						

Problem category legend listed on page 5 of this Appendix.

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IPA ASSIGNMENTS BY PROBLEM CATEGORY

NO.	IPA ASSIGNMENT	A	B	C	D	E	F	G
66	HQ-302-92-92E	1						
67	09-179-93-95E			1			1	
68	09-180-93-94N			1			1	
69	09-196-94-95E			1			1	
70	09-178-93-94N			1			1	
71	09-153-92-94E							1
72	09-131-91-95E							1
73	09-186-93-95N							1
74	09-178-93-94N			1			1	
75	09-197-94-94N			1			1	
76	09-160-92-94E			1			1	
77	09-195-94-94N			1			1	
78	HQ-332-93-95N	1	1					
79	HQ-279-91-93N	2		1				
80	HQ-273-91-93N	2						
81	HQ-262-91-93N			1				
82	HQ-227-90-95E	1		1				
83	09-180-93-94N			1			1	
84	09-186-93-95NE			1			1	
85	09-186-93-95NE			1			1	
86	09-118-89-93E		1					
87	09-156-92-92N	1						

Problem category legend listed on page 5 of this Appendix.

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IPA ASSIGNMENTS BY PROBLEM CATEGORY

NO.	IPA ASSIGNMENT	A	B	C	D	E	F	G
88	09-180-93-94N			1			1	
89	09-195-94-94N			1			1	
90	09-182-93-94N							1
91	09-179-93-94N			1			1	
92	09-174-93-93N			1			1	
93	09-180-93-94N			1			1	
94	HQ-272-91-94E	1						
95	09-065-87-90E		1					
96	09-062-86-90E		1					
	TOTALS	49	23	35	4	4	26	9

Legend--Problem Category Titles

- A. Questionable Costs.
- B. Assignees Not Returning To Their "Home" Organization.
- C. Ineligible Assignments.
- D. Multiple Problems Indicate Program Abuse.
- E. IPA Program Inequities.
- F. Questionable Region 9 Blanket Agreements.
- G. Assignments Augmenting State Staff On A Long-Term Basis.

Notes

Some agreements are listed more than once because the same problem arose for different assignees using the same blanket agreement. Totals for B, D, E, F, G related to problem category titles above. Totals for A and C related to subtitles under the problem category titles above.

EPA'S ADMINISTRATION OF IPA ASSIGNMENTS

APPENDIX III

IPA QUESTIONED COSTS

<u>AGREEMENT</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
HQ-272-91-94E	\$4,070	EPA underbilled for fringe benefits for 7 months.
HQ-288-90-94E	\$5,000	EPA did not bill for travel and relocation costs to the assignment.
HQ-299-92-94N	\$10,841	September and October 1994 payments not supported.
HQ-279-91-93N	\$8,575	August 1992 payment not supported.
HQ-271-91-93N	\$53,915	Fiscal 1992 and 1993 payments not supported.
HQ-227-90-94E	\$46,856	April and August 1993 and April and May 1994 payments not supported by invoices. Invoices not detailed to determine if proper salary percentages were paid per the IPA agreement.
Total	<u>\$129,257</u>	

EPA'S ADMINISTRATION OF IPA ASSIGNMENTS

APPENDIX IV

ACRONYMS

AD	Administratively Determined
ASTPHLD	Association of State and Territorial Public Health Laboratory Directors
CFMC	Cincinnati Financial Management Center
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
FPM	Federal Personnel Manual
GM	General Manager
GS	General Schedule
IPA	Intergovernmental Personnel Act
NETAC	National Environmental Technology Applications Corporation
OARM	Office of Administration and Resources Management
OCEM	Office of Cooperative Environmental Management
OGC	Office of General Counsel
OHROS	Office of Human Resources and Organizational Services
OPM	Office of Personnel Management
PCS	Permanent Change of Station
PO	Project Officer
SES	Senior Executive Service
TDY	Temporary Duty
U.S.C.	United States Code

EPA'S ADMINISTRATION OF IPA ASSIGNMENTS

APPENDIX VII

REPORT DISTRIBUTION

Office of the Inspector General

Inspector General (2410)

Deputy Inspector General (2410)

Divisional Inspectors General

Director, Planning and Resources Management Staff,
Office of Audit (2421)

EPA Headquarters

Assistant Administrator for Administration and
Resources Management (3101)

Director, Office of Human Resources and
Organizational Support (3610)

Comptroller, Office of the Comptroller (3301)

Director, Financial Management Division (3303F)

Audit Followup Coordinator, OARM (3102)

Agency Followup Coordinator (3304)
Attn: Director, Resources Management Division

Associate Administrator for Congressional and
Legislative Affairs (1301)

Associate Administrator for Communications,
Education and Public Affairs (1701)

Regional Offices

Regional Administrator, Region 9

Audit Followup Coordinator, Region 9

Financial Management Officer, Cincinnati Financial
Management Center

