



At a Glance

Why We Did This Review

Our objective was to determine to what extent the U.S. Environmental Protection Agency (EPA) Office of Pollution Prevention and Toxics' (OPPT's) Risk Assessment Division (RAD) uses and implements quality management policies during chemical risk assessments.

The goal of the quality management system is to provide a foundation to "ensure that environmental data are of sufficient quantity and quality to support the data's intended use." Each EPA office that collects, evaluates and uses environmental data is required to develop a Quality Management Plan. That plan defines an organization's quality-related policies, procedures, roles, responsibilities and authorities.

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

- *Ensuring the safety of chemicals and preventing pollution.*

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The full report is at: www.epa.gov/oig/reports/2014/20140910-14-P-0350.pdf

EPA's Risk Assessment Division Has Not Fully Adhered to Its Quality Management Plan

What We Found

RAD has adhered to some but not all aspects of its current Quality Management Plan. RAD has not fully implemented key aspects of its plan related to training, internal audits and plan revisions. Additionally, unlike other agency offices, RAD does not post its Quality Management Plan online as a good business practice.

Without a robust quality management system, RAD risks making environmental and human health policy decisions that rest on a faulty foundation.

RAD is not ensuring managers and staff take in-house formal quality assurance training. RAD, instead, relies on branch chiefs and project managers to informally train staff through mentoring. OPPT is aware of the need to provide formal quality assurance training to its staff. The Quality Assurance Manager acknowledged the quality assurance training gap and plans to develop specific quality assurance training. Additionally, RAD did not conduct a formal quality assurance training needs assessment.

The RAD Quality Assurance Coordinator has not conducted internal audits of quality assurance programs. Moreover, RAD has not revised its Quality Assurance Annual Report and Work Plan or Quality Management Plan when changes occurred to its program activities that involve major risk assessment responsibilities. Lastly, RAD does not post its Quality Management Plan on its Intranet, which can facilitate internal sharing and ease staff access. The EPA needs to have accurate, reliable and relevant Quality Management Plans because they are an essential part of valid and reliable decisions. Chemical risk assessments using high-quality data are critical to maintaining public trust in the EPA.

Recommendations and Planned Agency Corrective Actions

We recommend that the Assistant Administrator for Chemical Safety and Pollution Prevention develop formal quality assurance training, direct RAD to conduct internal quality assurance audits and training needs assessments, and ensure that relevant RAD Quality Management Plans are updated when changes to quality assurance activities occur. In addition, the Office of Chemical Safety and Pollution Prevention needs to provide RAD's Quality Management Plan on the OPPT Intranet and conduct a quality assurance analysis of OPPT to determine whether all divisions have fully implemented their quality management plans. The EPA agreed with our recommendations and has proposed acceptable corrective actions. All recommendations are resolved.