Programmatic Reviews

To strengthen Internal Controls for Quality and Management Integrity

Jeffrey C. Worthington, CQA, CQMgr.
Director – OEI Quality Program
Management Integrity Advisor
Office of Environmental Information
U.S. Environmental Protection Agency

Fellow
Past-Chair, Energy and Environmental Division
American Society for Quality

National Environmental Monitoring Conference
U.S EPA & NELAC Institute
Washington, DC
August 6th, 2012

Jeffrey Worthington- BIO

- Director - USEPA Office of Environmental Information Quality Program. Jeff served as the Director of USEPA ORD National Risk Management Research Laboratory (NRMRL) Quality Program and as the Director of TechLaw, Inc.'s Quality Program. He is an American Society for Quality (ASQ) Certified Quality Manager and ASQ Certified Quality Auditor. In 2006, Jeff was elected an ASQ Fellow. He is a founding member of the Government Division, Past-Chair of the ASQ Energy & Environment Division, and served on the ASQ Division Affairs Council. He is a founding member and past Director of the International Association for Information and Data Quality (IAIDQ). Jeff served as Editorial Board member for Quality Assurance, Science, and the Law, the Journal of Environmental Forensics, Environmental Laboratory magazine, and Environmental Testing and Analysis magazine.

- He has been with the Federal Government since 1994. Jeff co-led a team authoring the combined quality and management system for EPA's Environmental Technology Verification (ETV) program. He co-led the EPA team developing EPA's Information Quality Guidelines. Jeff co-authored peer review journal papers receiving 1)the USEPA Science and Technological Achievement Award (STAA), Level III for equating EPA policies and procedures to U.S. Supreme Court Sound Science Criteria (2002) and 2)an STAA Honorable Mention for developing electronic recordkeeping QA parameters (2006).

- Jeff received a National Security Telecommunications and Information Systems Security (NSTISSI) 4011 Certificate for information systems security (INFOSEC) professionals and a Chief Information Officer (CIO) certificate at the National Defense University (NDU) Information Resources Management College (IRMC).

- Jeff served as a Peace Corps Volunteer and Chemistry Department Head at Bishop Herman Secondary School in Kpandu, Ghana from 1977-1979.
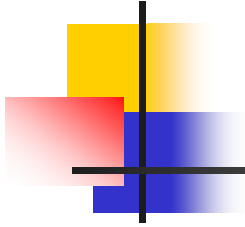
DISCLAIMER

The opinions expressed in this technical presentation are those of the authors and do not necessarily reflect the views of the US EPA.

OVERVIEW

- FMFIA Perspective & Principles
- Internal Controls and Objectives
- NEW Office/Region Program Review Strategies
- NEW Office/Region Multi-Year Program Review Plan
- Aligning "key programs" to strategies
- OEI's approach to Quality
- Alignment perspectives
- OEI approach to identifying key programs
- OEI multi-year planning
- Review "requirements"
- Terminology challenges
- Special considerations for "administrative programs"
- Discussion and questions
- Conclusion

FMFIA Perspective

- Federal Managers Financial Integrity Act of 1982
  - To require ongoing evaluations and reports of the adequacy of the systems of internal accounting and administrative control of each executive agency, and for other purposes.
- 2004 Revisions to OMB Circular A-123, Management's Responsibility for Internal Control
  - Management's fundamental responsibility to develop and maintain effective internal control.
  - Effective internal control provides assurance that significant weaknesses in the design or operation of internal control that could adversely affect the agency's ability to meet its objectives, would be prevented or detected in a timely manner.
- EPA Agency Guidance – EPA Order 1000.24 CHG2, Management's Responsibility for Internal Control
  - Agency roles and responsibilities
  - Procedures
  - Strategy
  - Principles

PRINCIPLES
EPA Order – Management's Responsibility
for Internal Controls

1. **The Guidance Principle.** Develop written strategies, policies, guidance, procedures, and performance measures to achieve EPA's mission and safeguard programs and resources against, fraud, waste, loss, unauthorized use, and misappropriation.

2. **The Accountability Principle.** Establish an organizational structure and delegate authority, responsibility, and accountability in accordance with Agency guidelines to achieve the mission of the organization.

3. **The Feedback Principle.** Carry out program activities, consistent with established policies, strategies, guidance and procedures, and report significant, emerging management problems through the chain of command to the appropriate National Program Manager for action.

4. **The Competency Principle.** Demonstrate personal integrity, provide quality supervision, and sustain a level of professional competence to accomplish assignments and to ensure that management objectives are achieved.

5. **The Quality Data Principle.** Collect and assure the quality of data and other information necessary to manage environmental programs and continuously improve the basis for the Agency's scientific, technical, legal, enforcement, or management decisions.

6. **The Separation Principle.** Separate key duties and responsibilities in authorizing, reviewing and approving payment, and limit access to, and maintain individual accountability for the custody or use of resources, to those authorized.

7. **The Comparison Principle.** Periodically compare written records of actual and planned activities for budget expenditures, program operations, property inventory, and staffing levels, to identify discrepancies and take appropriate action, where vulnerabilities exist.

8. **The Identification Principle.** Use all available information sources to identify and routinely assess program areas that are vulnerable to fraud, mismanagement, and non-compliance with law.

9. **The Review Principle.** Develop and carry out a systematic review strategy, comprised of internal program reviews, OIG audits, and GAO studies, to assess the effectiveness of program guidance and procedures, and revise, as necessary.

10. **The Correction Principle.** Promptly determine, and carry out management actions to correct, within established time frames, significant problems identified by internal programs, OIG, and GAO reviews.

Internal Controls

Internal control is an integral component of an organization's management that provides reasonable assurance that the following objectives are being achieved:

- effectiveness and efficiency of operations, (for example, a quality control)
- reliability of financial reporting, and
- compliance with applicable laws and regulations.

Internal Control Objectives

Management is responsible for developing and maintaining internal control activities that comply with the following standards to meet the above objectives:

- Control Environment,
- Risk Assessment,
- Control Activities,
- Information and Communications, and
- Monitoring

Objective 1: Control Environment

Organizational structure and culture created by management and employees to sustain organizational support for effective internal control.

- Defined areas of authority and responsibility
- Appropriately delegated authority and responsibility
- Suitable hierarchy for reporting
- Appropriate human capital policies for hiring, training, evaluating, counseling, advancing, compensating, and disciplining personnel
- Uphold need for personnel to possess and maintain proper knowledge and skills and understand needs for internal controls
- Defined culture in terms of integrity and ethical behavior
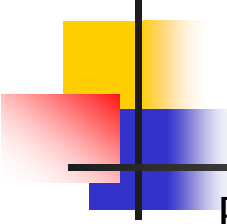
Objective 2:
Risk Assessment

Management should:

- Identify internal and external risks that may prevent the organization from meeting its objectives

- Consider:
  - Relevant interactions with the organization as well as with outside organizations
  - Consider previous findings from reviews, noncompliance, etc.

- Analyze risks for their potential impact on the Agency.

Objective 3:
Control Activities 🔊

Policies, procedures, and mechanisms in place to ensure agency objectives are met.

Hey, this is starting to sound like quality!

Examples:

- Segregation of duties
- Physical control over assets
- Proper authorizations
- Appropriate documentation
- Also, controls over information systems:
    - General controls such as mainframe and security
    - Application control such as edit checks, transaction authorization

Objective 4:
Information and Communications

Information should be communicated to relevant personnel at all levels with an organization. Information should be:

- Relevant
- Reliable
- Timely

Objective 5: Monitoring

Monitoring the effectiveness of internal control should occur in the normal course of business.

- Period reviews
- Reconciliations or comparisons of data

Deficiencies found should be reported, evaluated, and corrected through a systematic process.

Other resources for FMFIA

- Standards for Internal Control in the Federal Government, GAO, 1999 http://www.gao.gov/special.pubs/ai00021p.pdf

- Internal Control Management and Evaluation Tool, GAO, 2001 http://www.gao.gov/new.items/d011008g.pdf

- OMB Circular A-123, Management's Responsibility for Internal Control, OMB, 2004 http://www.whitehouse.gov/omb/circulars_a123_rev

- Federal Managers Financial Integrity Act of 1982, http://www.whitehouse.gov/omb/financial_fmfia1982

- OCFO Definitions/Reporting Requirements http://intranet.epa.gov/ocfo/perform/pdfs/mgmt_integrity/definitions_reporting_req.pdf

- EPA Order 100.24 CHG2, Management's Responsibility for Internal Control, 2008 http://intranet.epa.gov/ohr/rmpolicy/ads/orders/1000_24-2.pdf

OCFO Goals for Management Integrity - FY 2010 and Beyond

1. Implement systematic and rigorous reviews of internal controls over programmatic operations.

2. Establish clear regional and national program roles and responsibilities for reviewing programmatic controls and sharing information between offices.

NEW Office/Region Program Review Strategies

PLANNING

- Identify key programs and operations
- Develop a program review strategy for each of the key programs and operations
- Prepare a multiyear plan for reviewing internal controls over program operations

ASSESSING

- Conduct reviews, testing, and monitoring activities
- Determine corrective actions
- Document findings
- (Corrective Actions?)

PROGRAM REVIEW STRATEGY TEMPLATE

KEY PROGRAM INFORMATION   DATE OF REVIEW: _____   REVIEWED BY:_____

PROGRAM NAME:

_____

RESPONSIBLE OFFICE / DIVISION / KEY REGIONS: _____

GOAL / OBJECTIVE / SUBOBJECTIVE:_____

Control Environment (The structure and culture created by management and employees to sustain organizational support for internal controls.)

Control Objective (Desired result or purpose achieved)	Risk Assessment (Internal and external risks that prevent achievement of objectives)	Risk Level (Low, Medium, High)	Control Activities (Policies, procedures, mechanisms and performance measures in place to mitigate risk and ensure that control objective is met)	Information/Communication (Ensure relevant, reliable, and timely information internally and externally)	Monitoring (Periodic reviews, reconciliation, or comparison of detective and preventative data)

NEW Office/Region Multi-Year Program Review Plan

- Schedule of assessments that will be done each year
- High risk areas may be reviewed annually
- Priorities suggested by OCFO include:
  - Programs which are funded by or which support the Recovery Act
  - Programs that have been designated as material, Agency-level, or office-level weaknesses
  - Programs and activities which EPA's Office of Inspector General, the Government Accountability Office, or the Office of Management and Budget have identified as management challenges for the Agency
  - Programs that represent Agency priorities

MULTIYEAR PLAN TEMPLATE
(SAMPLE FORMAT)

Organization (AAship / Regional Office: _____

Signature:

Responsible Manager: _____   Date: _____

Internal Control Review (program, function or activity to be reviewed)	Year of Review	Type		Summary of Review	Deficiencies Identified (if applicable)	Corrective Actions	
		Internal	External			completed	remaining
Example: Audit Follow-up Program	FY 2009	internal OIG audit		An OIG audit found that the Agency can do more to improve its audit follow-up process, and ensure that the information reported to Congress is accurate. *(Note: You may wish to complete this column for reviews that you have completed.)*	OIG cited a number of conditions that it believes require management attention (see audit report for details). *(Note: You may wish to complete this column for reviews that you have completed.)*	5 *(Note: You may wish to complete this column for reviews that you have completed.)*	1 *(Note: You may wish to complete this column for reviews that you have completed.)*
Example: Records Management	Planned for FY 2010						
Example: Management Integrity Program	Planned for FY 2011						

OEI Quality Approach for new eQMP

- Based on <u>new Quality Policy</u> approach focusing on products & services

- Survey of all OEI products and services

- Identification of key categories of products and services for quality planning purposes

- Recognition of need to also identify programs that produce products and services

Alignment perspective

Quality Program Current Process	Management Integrity Programmatic Review needs
•Identification of <u>products and services</u> •Identification of <u>categories of products and services</u> •Recognition of program providing products and services •Criteria for quality assessments •Selected <u>annual assessments</u>	•Identification of <u>key programs</u> •<u>Strategy</u> for assessing each key program •Criteria for assessment for 5 Internal Control Standards •<u>Multi-year plan </u>to schedule and conduct programmatic reviews •<u>Multi-year schedule</u>

Alignment Analysis

	Purpose	Internal Controls	Planning	Implementation	Assessment	Assessment Requirements
FMFIA	To ensure management integrity	Financial and programmatic areas	Management planning	Action plans Administrative processes	Programmatic Reviews	Internal Control Standards Program Review Strategies
Quality	To ensure the quality of products and services	Programs, products, and services	Quality planning	Quality plans Project plans	Quality Assessments	Quality Requirements Project Requirements

FMFIA Program

Financial Internal Controls

Programmatic Internal Controls

A-123 Reviews

Other reviews

Quality Program Internal Controls "Quality Controls"

Mgt. Integrity Internal Control Standards

FISMA security reviews

Quality Planning

Quality Implementation

Quality Assessment

Programmatic Reviews

Assessment Requirements

Review Requirements

Alignment

FMFIA Program

- Financial Internal Controls
  - A-123 Reviews
    - FISMA security reviews
  - Other reviews
- Programmatic Internal Controls
  - Quality Program Internal Controls "Quality Controls"
    - Quality Planning
    - Quality Implementation
    - Quality Assessment
      - Assessment Requirements
  - Mgt. Integrity Internal Control Standards
    - Programmatic Reviews
      - Review Requirements
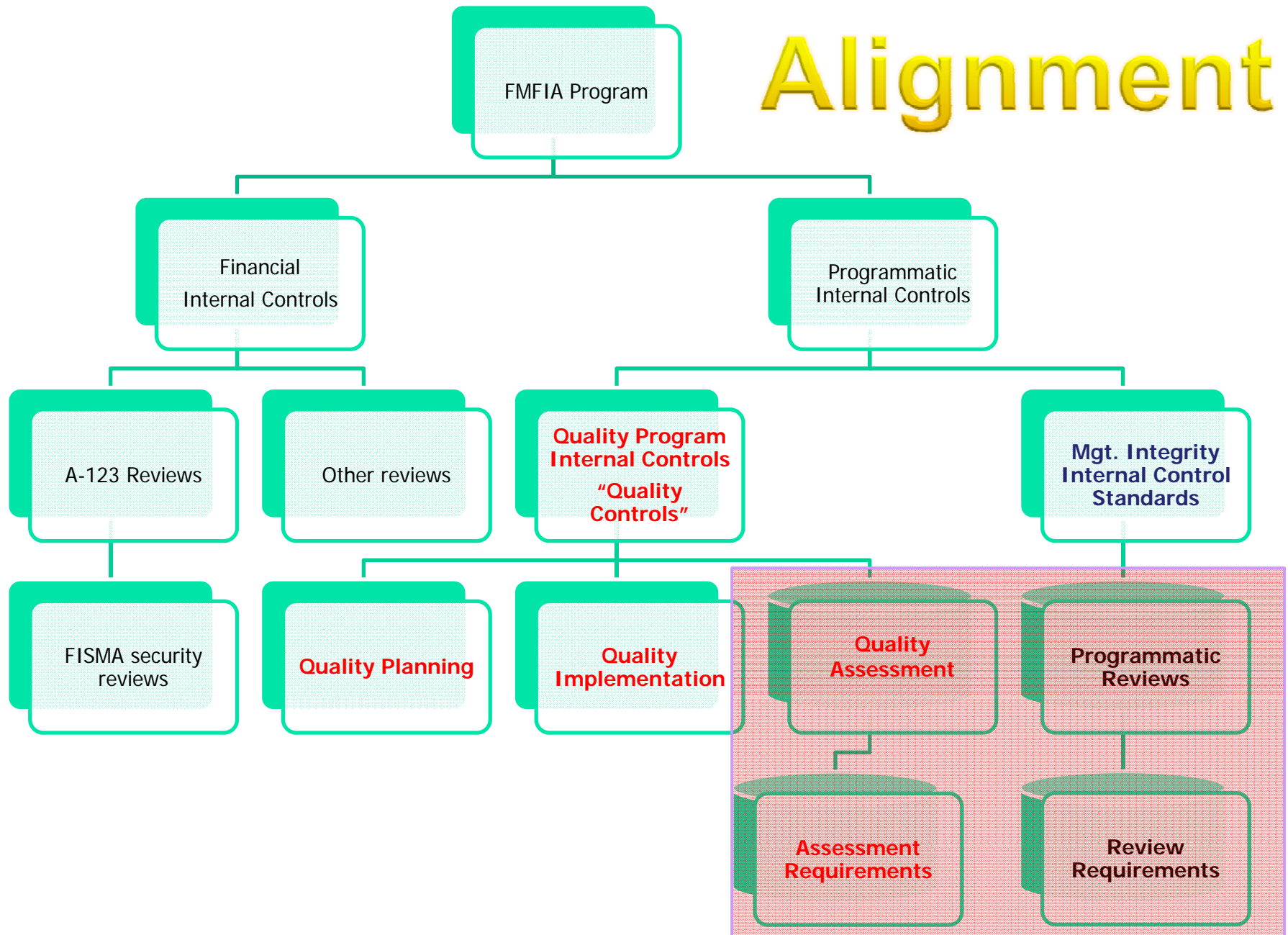
OEI Approach to Identifying "key programs"

OEI identified 8 "key program AREAS" rather than key programs and provided a listing of products and services associated with those key program areas. The areas included:

- National program/leadership management
- Administration of Agency and Federal programs
- Publications
- Science/Data Analysis
- Data/Information Systems
- Shared Data Services
- Shared IT Services
- Technical and Security Infrastructure

For each key program area, OEI developed a strategic plan to cover all products and services in that key program area.

Example of an OEI Key Program Area

KEY PROGRAM INFORMATION   DATE OF REVIEW: _____   REVIEWED BY:_____

PROGRAM NAME **DATA/INFORMATION SYSTEMS**

_____

RESPONSIBLE OFFICE / DIVISION / KEY REGIONS: Office of Environmental Information

GOAL / OBJECTIVE /
SUBOBJECTIVE:_____

Control Environment: Detailed description of the OEI Control Environment is provided in the annual OEI FMFIA Letter, including management's process to communicate the need for transparency and integrity.

For "Data/Information Systems," OEI Leadership:
- Communicates its commitment to transparency for data and information systems.
- Establishes an organizational structure with responsibility for implementing each major data and information system.
- Ensures each system is operated in accordance with all required information policies.

Control Objective	Risk Assessment	Risk Level	Control Activities	Information and Communication	Monitoring
• Data/information systems are correct, transparent, and meet customer needs. • Data/information systems operate in accordance with all information policies.	• Data/information systems are not correct, transparent, and do not meet customer needs. • Data/information systems do not conform to all information policies. • Data and information are not available to customers.	See Multi-Year Plan	• Documented plans and procedures • Staff training • Demonstrated conformance to technical requirements • Quality Assurance Surveillance Plans (QASPs), as appropriate • Implementation of OEI Quality System	• User (customer) feedback • Internal staff meetings • Reports to OEI management	• Periodic independent quality reviews • Tracking of performance metrics • IG/GAO assessments

OEI multi-year planning

- Identify high-risk areas
- Take into account all prior assessments (OIG, GAO, Quality, FMFIA, other external)
- Leverage current quality assessment process
- Utilize budget and quality resources
- Develop management integrity assessment criteria

Technical and Security Infrastructure

					Prior Assessments				Completed		Planned Assessments		
Key Program Areas	Products and Services	OEI Office	OIG	GAO	OEI QUALITY SYSTEM	FMFIA REPORTS	TECHNICAL SELF-ASSESSMENTS	Risk Level	FY10	FY11	FY12	FY13	FY14
Administration of Agency and Federal Programs	Budget Management	OPRO			06-5			L				OEI Quality Program	
Administration of Agency and Federal Programs	Unliqated Obligations	OPRO						L	Required A-123	Required A-123	Required A-123	Required A-123	Required A-123
Administration of Agency and Federal Programs	Controlled Correspondence Management	OPRO			06-5			M					OEI Quality Program
Administration of Agency and Federal Programs	Talent Management	OPRO	04-P-00024		06-5			M			OEI Quality Program (combined review with HR)		
Administration of Agency and Federal Programs	Human Resources Management	OPRO			06-5			M			OEI Quality Program		
Administration of Agency and Federal Programs	Implementation of Agency Requirements (ex., audit follow up coordination or management)	OPRO						M			OEI Quality Program - selected programs		OEI Quality Program - selected programs
Administration of Agency and Federal Programs	Implementation of Federal Requirements	OPRO						M				OEI Quality Program - selected programs	OEI Quality Program - selected programs
Administration of Agency and Federal Programs	Product Review	OPRO			06-5			L					OEI Quality Program
Administration of Agency and Federal Programs	OEI Records Management	OPRO			06-5			L					OEI Quality Program
Administration of Agency and Federal Programs	Property Management										OEI Quality Program		
Administration of Agency and Federal Programs	Resources Management	OPRO			06-5, 07-2			L					OEI Quality Program
Data/Information Systems	Envirofacts	OIAA						L	OEI Quality Program				OEI Quality Program

Technical and Security Infrastructure					Prior Assessments				Completed	Planned Assessments			
Key Program Areas	Products and Services	OEI Office	OIG	GAO	OEI QUALITY SYSTEM	FMFIA REPORTS	TECHNICAL SELF-ASSESSMENTS	Risk Level	FY10	FY11	FY12	FY13	FY14
National Program Leadership/Management	Library Network	OIAA		08-304, 08-579T				L	OEI Quality Program				OEI Quality Program
Data/Information Systems	Enterprise Data Services/Data Acquisition Program	OIC						L				OEI Quality Program	
National Program Leadership/Management	Enterprise Content Management System	OIC						L			OEI Quality Program		
National Program Leadership/Management	Facility Registry System/Locational Data Improvement Program	OIC			06-2		2003., 2004 (two), 2005 (two)	L			OEI Quality Program		
National Program Leadership/Management	Freedom of Information Act Program	OIC	2007-000399, 09-P-0127	08-344	06-14		2003	L				OEI Quality Program	
National Program Leadership/Management	Information Collection Request Program	OIC			06-3		2005	L					OEI Quality Program
National Program Leadership/Management	Privacy Management	OIC	06-S-00006, 07-P-0035		07-6	2009		M		OEI Quality Program			
National Program Leadership/Management	Records Management Program	OIC					2002	L		OEI Quality Program			
National Program Leadership/Management	Annual Environmental Information Symposium	OPRO						L					OEI Quality Program
National Program Leadership/Management	IT/IM Policy Management	OPRO		08-925	06-5, 06-7			L				OEI Quality Program	
National Program Leadership/Management	Enterprise Architecture Program	OTOP		06-831	07-4 2006	2002-2003	2009 Garter Review	L			OEI Quality Program		

Technical and Security Infrastructure					Prior Assessments				Completed		Planned Assessments		
Key Program Areas	Products and Services	OEI Office	OIG	GAO	OEI QUALITY SYSTEM	FMFIA REPORTS	TECHNICAL SELF-ASSESSMENTS	Risk Level	FY10	FY11	FY12	FY13	FY14
National Program Leadership/Management	Mission Contract Management	OTOP			06-1, 06-11, 06-12, 06-15, 07-10, 09-1 Annual updates to Quality Management Plan		2002 (two), 2003 (two), 2004, 2005 (two), w006 (two), 2007 (two), 2008 (eleven) 2006 - Performance measurement review; 2006-Customer Satisfaction Survey; 2008 - TO management review	L	2 OEI Quality Program Audits (CTS and ITS-ESE)		OEI Quality Program - selected programs (ITS-EPA)	OEI Quality Program - selected programs	OEI Quality Program - selected programs
National Program Leadership/Management	Agency Quality Policies/Procedures	QS	2004-1400, 06-P-0036			2002-2004, 2009		M			OEI Quality Program		
National Program Leadership/Management	Assessment Reports	QS						M			OEI Quality Program		
National Program Leadership/Management	Information Quality Guidelines (IQG) Program	QS						M		OEI Quality Program			
National Program Leadership/Management	QAARWP	QS						M		OEI Quality Program			
National Program Leadership/Management	Quality Management Plan Review/Approval	QS						M		OEI Quality Program			
Publications	Guidance	QS						L				OEI Quality Program	
Publications	Training Architecture	QS						M				OEI Quality Program	
Science/Data Analysis	TRI National Analysis	OIAA	04-P-00004	07-464T, 08-115T, 08-128	06-9, 06-10, 07-12		2002 (two), 2004, 2005 (two), 2008	L		OEI Quality Program			
Shared Data Services	Automated Commercial Environment/International Trade Data Sys.	OIC						M			OEI Quality Program		

Technical and Security Infrastructure					Prior Assessments				Completed		Planned Assessments		
Key Program Areas	Products and Services	OEI Office	OIG	GAO	OEI QUALITY SYSTEM	FMFIA REPORTS	TECHNICAL SELF-ASSESSMENTS	Risk Level	FY10	FY11	FY12	FY13	FY14
National Program Leadership/Management	Mission Contract Management	OTOP			06-1, 06-11, 06-12, 06-15, 07-10, 09-1 Annual updates to Quality Management Plan		2002 (two), 2003 (two), 2004, 2005 (two), w006 (two), 2007 (two), 2008 (eleven) 2006 - Performance measurement review; 2006-Customer Satisfaction Survey; 2008 - TO management review	L	2 OEI Quality Program Audits (CTS and ITS-ESE)		OEI Quality Program - selected programs (ITS-EPA)	OEI Quality Program - selected programs	OEI Quality Program - selected programs
National Program Leadership/Management	Agency Quality Policies/Procedures	QS	2004-1400, 06-P-0036			2002-2004, 2009		M			OEI Quality Program		
National Program Leadership/Management	Assessment Reports	QS						M			OEI Quality Program		
National Program Leadership/Management	Information Quality Guidelines (IQG) Program	QS						M		OEI Quality Program			
National Program Leadership/Management	QAARWP	QS						M		OEI Quality Program			
National Program Leadership/Management	Quality Management Plan Review/Approval	QS						M		OEI Quality Program			
Publications	Guidance	QS						L				OEI Quality Program	
Publications	Training Architecture	QS						M				OEI Quality Program	
Science/Data Analysis	TRI National Analysis	OIAA	04-P-00004	07-464T, 08-115T, 08-128	06-9, 06-10, 07-12		2002 (two), 2004, 2005 (two), 2008	L		OEI Quality Program			
Shared Data Services	Automated Commercial Environment/International Trade Data Sys.	OIC						M			OEI Quality Program		

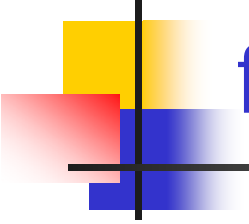| Technical and Security Infrastructure		Prior Assessments							Completed	Planned Assessments			
Key Program Areas	Products and Services	OEI Office	OIG	GAO	OEI QUALITY SYSTEM	FMFIA REPORTS	TECHNICAL SELF-ASSESSMENTS	Risk Level	FY10	FY11	FY12	FY13	FY14
National Program Leadership/Management	Section 508 Compliance	OIAA					2002	L			OEI Quality Program		
Technical and Security Infrastructure	Web Infrastructure	OIAA						L		OEI Quality Program			
Technical and Security Infrastructure	Federal Information Security Management Act (FISMA)	OTOP					FISMA 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009	M	FISMA annual	FISMA annual	FISMA annual	FISMA annual	FISMA annual

Internal controls review requirements for management integrity

GENERAL – applicable at organization level

Code of ethics	OEI has established and uses a code of conduct and other policies communicating appropriate ethical behavior standards.
Commitment to competence	OEI provides training and counseling in order to help employees maintain and improve their competence for their jobs.
Organizational structure	OEI management establishes clear internal reporting relationships, and periodically evaluates the organizational structure.
Authority and responsibility	OEI appropriately assigns authority and delegates responsibility to the proper personnel.
Human resource policies and practices	Policies and procedures are in place for hiring, orienting, training, evaluating, counseling, promoting, compensating, disciplining, and terminating OEI employees.
Risk assessment	OEI has an integrated management strategy and risk assessment plan that considers the organization-wide objectives and relevant sources of risk, and establishes a control structure to address those risks.
Physical control over assets	OEI employs physical control to secure and safeguard vulnerable assets.
Performance information	Information from internal and external sources is obtained and provided to OEI management as a part of the organization's reporting on operational performance relative to established objectives.

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Internal controls review requirements for management integrity

Product/Service/Process-Specific (applicable at activity level)

Policies and procedures	Appropriate policies, procedures, techniques, and mechanisms exist with respect to each OEI product/service/process.
Management reviews	OEI line managers routinely review and document actual performance against targets.
Information processing	OEI line mangers employ a variety of control activities suited to information processing systems to ensure accuracy and completeness.
Segregation of duties	Key duties and responsibilities in OEI are divided or segregated among different people to reduce the risk of error, waste, or fraud.
Execution and recording of transactions	Transactions and other significant events are authorized and performed by the appropriate OEI personnel, and are properly classified and promptly recorded.
Access restrictions	Access to OEI resources and records is limited and accountability for their custody is assigned.
Documentation	OEI internal controls and all transactions and other significant events are clearly documented.
Internal control monitoring	In the process of carrying out their regular activities, OEI personnel obtain information about whether internal controls are functioning properly.

Internal controls review requirements for quality

General (applicable at organizational level)

Management planning	OEI operates under a comprehensive Quality Management Plan, and component OEI organizations may document their overall approach to managing for quality in a Program Plan, Management Plan, or similarly titled document.
Annual reporting	OEI organizations submit contributions to OEI's Quality Assurance Annual Report and Work Plan.

Internal controls review requirements for quality

Product/Service/Process-Specific (applicable at activity level)

Program planning	Major OEI program areas develop and document plans to address their approach to quality performance. These documents can be labeled as a Quality Plan, Management Plan, Project Plan, or similar title.
Product-specific planning	As appropriate, OEI lines managers develop product/service/process-specific plans to address their approach to quality performance.
Training	OEI employees are provided with all training required to ensure successful performance of OEI activities.
Policies, procedures, standards, and guidance	OEI line managers develop and implement appropriate policies, procedures, standards, and guidance as appropriate in support of OEI activities.
Peer review	Specific OEI products may be selected to undergo peer review, a formal process for documented critical review of Agency scientific and/or technical work products.
Product/pre-dissemination review	OEI has a formal process for formal review of all major products and for pre-dissemination review of all products to be released outside the Agency.
Quality assessments	Each year the OEI Director of Quality conducts a series of quality assessments focusing on selected OEI activities.

Terminology Challenges

Administrative Program	Reports	Followup Activity
Office Quality Program	Internal Assessments •findings	Corrective Actions
Office of Inspector General	Draft Report Final Report •recommendations	Corrective Actions
Quality Staff	Draft Report Final Report •recommendation	Corrective Action

FMFIA	A-123 Reviews
	Financial Reviews
	Programmatic Reviews
	FMFIA Letter
	•Deficiency
	•Significant deficiency
	•Weakness
	   Office-level
	   Agency-level
	   Material
	•Management Challenge
		Corrective Actions
		"Weakness Corrective Actions"
		"Weakness Validation Strategy"

Terminology Challenges

Administrative Program	Reports	Followup Activity
Office Quality Program	Internal Assessments •findings	Corrective Actions
Office of Inspector General	Draft Report Final Report •recommendations	Corrective Actions
Quality Staff	Draft Report Final Report •recommendations	Corrective Action

FMFIA	A-123 Reviews
	Financial Reviews
	Programmatic Reviews
	FMFIA Letter
	•Deficiency
	•Significant deficiency
	•Weakness
	   Office-level
	   Agency-level
	   Material
	•Management Challenge
		Corrective Actions
		"Weakness Corrective Actions"
		"Weakness Validation Strategy"

Scheduling and conducting joint reviews

- Scheduling based on covering all programs within 5 years at least once
- Need for one or more than one audit every 5 years
- Level of risk and importance of a program
- Considerations for areas of focus (e.g., ULOs)
- Budgetary planning for quality assessments
- Consideration for past assessments by the OIG and GAO
- Office-level desire to conduct their own assessments
- Taking advantage of built-in program assessments

Considerations for "administrative programs"

Office of the Administrator (OA)
- Product review
- Action Development Process
- Minority Academic Intern Program

Office of Administration and Resources Management (OARM)
- Procurement
- Contracting
- Directives Clearance
- Delegations Management
- Property Management
- National Honor Awards Program
- Human Capital Planning
  - Development Training
  - HC Strategy
  - Succession Planning
- Human Resources Management
  - Personnel Actions (e.g., recruitment, classification)
  - PARS
  - QSIs
  - Interns
  - Flexiplace
  - Awards (monetary & timeoff)
  - SEPM/DEPM
  - SEE Program
  - Violence in Workplace
  - Diversity

Office of the Chief Financial Officer (OCFO)
- OIG audit followup program
- GAO audit coordination
- FMFIA
- Budget & planning
  - Strategic planning process
  - GPRA
  - Annual Budget
- Accounting processes
  - ULO reconciliation
- PeoplePlus & Time Management
- Travel program
- Working Capital Fund (jointly with OEI)
- Bankcard

Office of Environmental Information (OEI)
- Clinger-Cohen Implemention (CIO role) including Information policies & procedures
  - IMO and SIO functions
- FISMA Implementation
- Agency Quality program
- Information Quality Guidelines
- Records Management
- FOIA Process
- Working Capital Fund Program (jointly with OCFO)
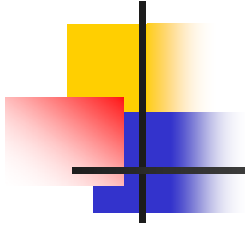- Data Standards

Office of General Counsel (OGC)
- Ethics program

Office of Research and Development (ORD)
- Peer Review Program
- Science Inventory Program

Ongoing challenges

- Improving the alignment of quality and management integrity

- Improving assessment requirements

- Better capturing of administrative program expecations

Conclusion

- Programmatic Review Process will continue to evolve

- Resources are conserved by leveraging quality review process

- Terminology must be considered during alignment

- Defined review requirements ("assessment criteria") for both area strengthens assessment programs:
    - Management Integrity Assessment Criteria
    - Quality Assessment Criteria

Discussion And Questions ??????

CONTACT INFORMATION

Jeffrey Worthington - EPA

202-566-0995

worthington.jeffrey@epa.gov