Message

From: Otto, Martha [Otto.Martha@epa.gov]
Sent: 1/6/2020 8:47:06 PM
To: Grifo, Francesca [Grifo.Francesca@epa.gov]
Subject: RE: DRAFT EMAIL TO DAVID BLOOM -- Question about the FMFIA Assurance Letter Template for 2020

This looks great. The only issue is your subject line in the email message.

From: Grifo, Francesca <Grifo.Francesca@epa.gov>
Sent: Monday, January 06, 2020 3:09 PM
To: Bloom, David <Bloom.David@epa.gov>
Cc: Otto, Martha <Otto.Martha@epa.gov>
Subject: FW: DRAFT EMAIL TO DAVID BLOOM -- Question about the FMFIA Assurance Letter Template for 2020
Importance: High

Hi David and Happy New Year!!,

I wanted to bring to your attention a concern that I have about the 2019 FMFIA Assurance Letter Template. Although we had provided input to your staff about the language on scientific integrity for the template letter, the final letter included no mention of scientific integrity.

As you know, the Scientific Integrity Policy requires that offices/programs/regions certify compliance with the Policy each year and we have been doing this through the FMFIA process. In fact, we were awarded a bronze medal a few years ago for doing it this way.

Attached is what we had suggested, with the text about scientific integrity highlighted (AL FORM – FY 2019 Assurance Letter Template (2-2-19) OSA with highlights.docx). I have also attached the final Assurance Letter Template (AL FORM – FY 2019 Assurance Letter Template (2-21-19).docx).

The final FY2019 assurance letter template had been streamlined and did not include any mention of scientific integrity. FY 2019 guidance did include information on scientific integrity on page 8, which was posted on the OCFO Management Integrity SharePoint site. The following is the paragraph that mentions scientific integrity -- on page 8 of the guidance:

As appropriate, AAs and RAs assurance letter includes an assessment of the effectiveness of internal controls over program and administrative operations, and internal controls over reporting (including financial systems). Additionally, the assurance letter certifies their organization's compliance with EPA's Scientific Integrity Policy. Each program and region must submit Scientific Integrity implementation activities electronically to the Office of the Science Advisor for review and assessment by EPA's Scientific Integrity Committee. (The questionnaire and instructions for submission are available at Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

This paragraph says that "the assurance letter certifies their organization's compliance with EPA's Scientific Integrity Policy" but if there is no mention of scientific integrity in the actual assurance letter, this becomes a very passive certification.

Because the assurance letter template did not mention "scientific integrity," I sent an email to the Committee, reminding them of their need to certify compliance with the Policy in their assurance letters, and providing language for them to insert into their assurance letters.

For FY2020, I would appreciate if you could put the language on scientific integrity back into the Assurance Letter Template to help ensure that offices/programs/regions will certify compliance with the Policy in their assurance letters.

Please let me know if you have any concerns about any of this – happy to chat if that is helpful. Thank you for your support of scientific integrity at EPA.
Best,
Francesca