

# Audit of the EPA's Grants Workforce Planning

March 11, 2026 | Report No. 26-P-0017



## Abbreviations

C.F.R.	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
FY	Fiscal Year
IIJA	Infrastructure Investment and Jobs Act
IRA	Inflation Reduction Act
OCGO	Office of the Chief Grants Officer
OIG	Office of Inspector General
Pub. L.	Public Law

## Key Definitions

*Please see Appendix A for key definitions.*

## Cover Image

Collage of EPA grants-related policies. (EPA OIG image)

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# At a Glance

## Audit of the EPA's Grants Workforce Planning

### Why We Did This Audit

The U.S. Environmental Protection Agency Office of Inspector General conducted this audit to determine whether the EPA's grants workforce planning efforts are in accordance with federal requirements and address the workload for grants administered under annual and supplemental appropriations.

The EPA awards approximately half of its average annual budget of about \$9.2 billion as grants to states, local governments, and other eligible entities. Since fiscal year 2022, the EPA has also received around \$103 billion in supplemental appropriations via the Infrastructure Investment and Jobs Act and the Inflation Reduction Act. In May 2025, the EPA was managing 8,581 grants valued at around \$78.3 billion, which included about \$60.2 billion awarded from the supplemental appropriations. In July 2025, the One Big Beautiful Bill Act rescinded unobligated EPA funds associated with the Inflation Reduction Act.

Workforce planning consists of planning for and managing current and future workforce needs based, in part, on workload analyses. Office of Management and Budget Memorandum M-22-12 strongly encourages agencies to strategically plan for workforce needs to implement Infrastructure Investment and Jobs Act grant programs. The Office of Management and Budget did not provide similar guidance for the Inflation Reduction Act.

#### To support this EPA mission-related effort:

- *Operating efficiently and effectively.*

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### What We Found

The EPA lacks a plan to address its grants workforce needs and the challenges associated with the volume of grants awarded through annual and supplemental appropriations. From 2018 through May 2025, the EPA's supplemental appropriations increased the number and value of grants that the Agency manages by about 56 percent and 338 percent, respectively. While the EPA conducted agencywide workforce planning in accordance with federal requirements, it did not conduct specific grants workforce planning. Different program offices and regions across the EPA manage the workforce planning process, including hiring and staffing, in a decentralized manner.

Furthermore, the workload benchmarks that the EPA uses to gauge workloads for grant specialists and project officers—the grants workforce—may be outdated. The number of grants managed by the grants workforce varied from 2018 through 2025, with grant specialists in several regions frequently above their 60-grant benchmark and project officers in all program offices and regions consistently within their three- to 19-grant benchmark. These established benchmarks are based on a 2005 study, but federal requirements for grants management have changed since then to focus on enhanced results-oriented accountability for grants and to clarify requirements for agencies and recipients. In addition, the Agency's workload analyses may not comprehensively reflect the duties of the grants workforce. For example, the workload analyses do not account for the work performed prior to the grant being awarded or for the work required to close out grants. Finally, there is no formally documented process for conducting and communicating the results of these analyses.

Decentralized processes and limited resources impact how the Agency conducts workforce planning. According to the Agency, competing priorities as well as limited staff and time hampered its ability to develop an agencywide grants workforce plan, establish a written process for the workload analyses, and perform an updated benchmark study for the grants workforce.

**Without workforce planning for the EPA's grants workforce, the Agency risks mismanaging annual and supplemental appropriations and not complying with grants management requirements, which in turn leaves the EPA's grants-based programs vulnerable to fraud, waste, and abuse and imperils the Agency's mission.**

### Recommendations and Planned Agency Corrective Actions

We make four recommendations to the EPA, including that it (1) develop an agencywide grants workforce plan, (2) reassess and revise the benchmarks for the grant specialist and project officer workloads, (3) document the process used for conducting the workload analyses, and (4) develop a communication strategy to share the workload analyses results with EPA staff involved in grants workforce planning. The Agency agreed to implement corrective actions that meet the intent of Recommendations 3 and 4. Recommendation 3 is resolved with corrective actions pending. Corrective actions for Recommendation 4 have been completed. The Agency disagreed with Recommendations 1 and 2; those recommendations are unresolved with resolution efforts in progress.



**OFFICE OF INSPECTOR GENERAL**  
U.S. ENVIRONMENTAL PROTECTION AGENCY

March 11, 2026

**MEMORANDUM**

**SUBJECT:** Audit of the EPA's Grants Workforce Planning  
Report No. 26-P-0017

**FROM:** Nicole N. Murley, Deputy Inspector General performing the duties of  
the Inspector General *Nicole N. Murley*

**TO:** David Fotouhi, Deputy Administrator  
Office of the Administrator

Paige Hanson, Chief Financial Officer and Chief Administrative Officer  
Office of Finance and Administration

This is our report on the subject audit conducted by the U.S. Environmental Protection Agency Office of Inspector General. The project number for this audit was OA-FY24-0042. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

At the EPA, workforce planning is a collaborative effort between the Office of Finance and Administration's Offices of Budget and Performance, the Chief Grants Officer, the Chief Human Capital Officer, and Financial Operations and Management; the EPA programmatic offices, such as the Office of Water; and the EPA regional offices.

In accordance with EPA Manual 2750, your office completed corrective actions for Recommendation 4. Your office also provided acceptable planned corrective actions and estimated milestone dates in response to Recommendation 3, which is resolved. A final response pertaining to these recommendations is not required; however, if your office submits a response, it will be posted on the OIG's website, along with our memorandum commenting on the response.

**Action Required**

Recommendations 1 and 2 are unresolved. EPA Manual 2750 requires that recommendations be resolved promptly. Therefore, we request that the EPA provide us within 60 days its response concerning specific actions in process or alternative corrective actions proposed for the recommendations. This response will be posted on the OIG's website, along with our memorandum commenting on the

response. The response should be provided as an Adobe PDF file that complies with the requirements of section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that your office does not want released to the public; if the response contains such data, your office should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at [www.epa.gov/oig](http://www.epa.gov/oig).

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# Chapter 1

## Introduction

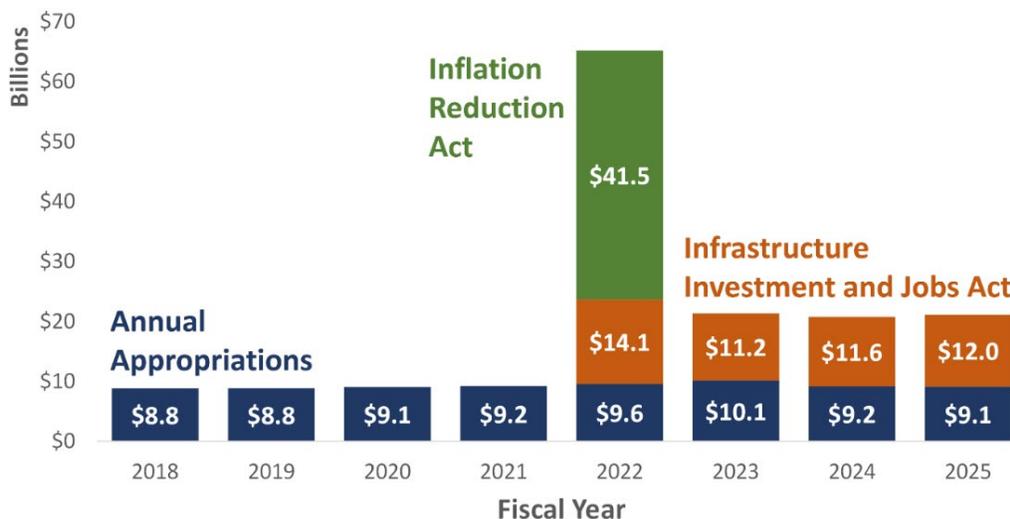
### Purpose

The U.S. Environmental Protection Agency Office of Inspector General initiated this audit to determine whether the EPA’s grants workforce planning efforts are in accordance with federal requirements and address the workload for grants administered under annual and supplemental appropriations.

### Background

According to the EPA’s *Grants Management Plan 2021-2025*, the EPA awards approximately 50 percent of its annual budget as grants to states, local governments, and other eligible entities. Grants are important tools that support the EPA’s mission to protect human health and the environment by funding projects to, for example, improve drinking water infrastructure and water quality. Given that the EPA has, on average, received about \$9.2 billion in annual appropriations since fiscal year 2018, the value of grants that the EPA awards is significant. In addition, since FY 2022, the EPA has received historic levels of supplemental funds via the Infrastructure Investment and Jobs Act, or IIJA, and the Inflation Reduction Act, or IRA. Signed into law in November 2021, the IIJA gave the EPA approximately \$61 billion over five years. The IRA, which was signed into law in August 2022, gave the EPA about \$41.5 billion.<sup>1</sup> Figure 1 shows the EPA’s annual and supplemental appropriations from FY 2018 through FY 2025. The IIJA provided another \$12 billion for FY 2026.

**Figure 1: The EPA’s annual, IIJA, and IRA appropriations, FY 2018–FY 2025**



Source: OIG analysis of the EPA’s budget, the IIJA, and the IRA. (EPA OIG image)

Note: The numbers in this figure are rounded to the nearest \$100 million.

<sup>1</sup> In July 2025, the One Big Beautiful Bill Act, Pub. L. No. 119-21, rescinded unobligated EPA funds provided from the IRA.

According to Agency data published in May 2025, the EPA was at that time managing approximately 8,581 grants valued at around \$78.3 billion, approximately \$60.2 billion of which was funded by supplemental IJA or IRA appropriations. The EPA awarded these 8,581 grants under 116 grant programs, which are programs specifically designed to provide funds to states, local governments, and other eligible entities to help the EPA achieve its mission of protecting human health and the environment. For example, the EPA Office of Water, which is the program office we selected to review to gain an understanding of grants management and workforce planning, has numerous grant programs that address different types of water projects, such as the Public Water System Supervision Grants Program, which helps water systems comply with the National Primary Drinking Water Regulations; the Drinking Water State Revolving Fund Program, a financial assistance program that helps water systems and states to achieve the health protection objectives of the Safe Drinking Water Act through various infrastructure projects; and the Training and Technical Assistance for Small Systems Grants Program, which provides training and technical assistance to small public water systems, small publicly owned wastewater systems, and private well owners.

Because of the supplementation appropriations, the number of grants that the EPA managed increased by 56 percent from 2018 to May 2025. The IJA and the IRA also increased the number of grant programs that the EPA must implement. On top of the grant programs funded by annual appropriations, the IJA funded 19 new and existing grant programs, while the IRA funded 24 new and existing grant programs. Furthermore, the amount of supplemental dollars flowing into the grant programs increased the value of grants that the Agency manages. In May 2025, the EPA was managing grants that valued 338 percent more compared to the grants that it managed in 2018.

To administer this workload, the Agency has staff who specialize in grants management and who are responsible for different functions within the grant life cycle. The EPA Office of Finance and Administration's Office of the Chief Grants Officer, or OCGO, provides guidance for the EPA's grants workforce.<sup>2</sup>

### ***Grant Specialists and Project Officers Oversee EPA Grants***

The EPA's grants workforce comprises many roles and responsibilities, including grant specialists and project officers, both of whom are responsible for overseeing grants in accordance with federal regulations like 2 C.F.R. part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," also known as the Uniform Guidance, and with EPA grants management policies. As shown in Appendix B, grant specialists and project officers have different

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<sup>2</sup> On November 16, 2025, the EPA finalized the creation of the Office of Finance and Administration, which reorganized several existing EPA offices, including the Office of Mission Support, the Office of Budget, the Office of the Chief Financial Officer, and the Office of the Chief Human Capital Officer, into one office. The former Office of Mission Support housed the Office of Grants and Debarment, which changed its name to the OCGO as part of its move to the Office of Finance and Administration. We updated language in this report to reflect these organizational changes.

responsibilities through the three grant-award phases: the pre-award phase, the post-award phase, and the closeout phase.

Grant specialists serve as the points of contact for grants administrative functions, which include reviewing applications and budgets during the pre-award phase, monitoring grants for compliance with administrative requirements during the post-award phase, and determining whether the recipient completed all the applicable administrative and financial actions during the closeout phase. Grant specialists typically report to the OCGO or a regional Mission Support Division. According to the OCGO's benchmarks for the grants workforce, which are based on an EPA-funded study completed by a contractor in April 2005, a grant specialist should manage no more than 60 grants at a time.<sup>3</sup>

Project officers serve as the points of contact for the technical and programmatic oversight of grants, which includes managing the negotiations and approvals of grant work plans during the pre-award phase, conducting baseline and advanced monitoring during the post-award phase, and ensuring that grant recipients meet their programmatic grant requirements during the closeout phase. Project officers are typically under the purview of the program offices or regions, such as the Office of Water or regional Water Divisions. According to the OCGO's benchmarks for the grants workforce, which are also based on the EPA-funded study completed by a contractor in April 2005, a project officer should manage from three to 19 grants at a time for a reasonable workload.

### ***EPA Workforce Planning Process Is Decentralized***

The EPA's overall workforce planning process, including hiring and staffing, is decentralized and occurs within different components of the Office of Finance and Administration, including the Office of the Chief Financial Officer, as well as within other offices, such as the specific program and regional offices and the Office of General Counsel. Similarly, workforce planning for grant specialists and project officers happens separately. Grant specialists are typically hired by and sit within either the OCGO or a regional Mission Support Division, and they focus specifically on grants-related work. In contrast, project officers are often hired by a specific program office or regional program division to manage a specific type of project, and they are assigned grants management duties as a collateral duty. For example, the Office of Water would hire a project officer to oversee water infrastructure projects, with grants management being only a portion of the project officer's responsibilities. The OCGO and regional Mission Support Divisions conduct joint workforce planning for grant specialists, while program offices like the Office of Water and regional program divisions like the Water Divisions conduct workforce planning for their staff assigned as project officers.

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<sup>3</sup> The EPA asked a contractor to characterize grants management workloads, including the activities associated with the award and administration of grants and other assistance agreements, and to identify how large of a workload that grant specialists and project officers could reasonably be expected to manage efficiently and effectively. The contractor developed separate workload models for grant specialists and project officers, which showed at the time that the EPA had an overall shortfall in the number of grant specialists and project officers. While the contractor did not suggest specific benchmarks for the EPA's grants workforce, the EPA did use the workload models to establish its benchmarks for grant specialists and project officers.

## Federal Law, Regulations, and Guidance Require Workforce Planning

According to the Government Performance and Results Act Modernization Act of 2010, Pub. L. No. 111-352, federal agencies should describe the human capital required to achieve objectives and goals in their strategic and performance plans. Regulations at 5 C.F.R. part 250, “Personnel Management in Agencies,” outline the authority for personnel actions in federal agencies and strategic human capital management requirements. Specifically, 5 C.F.R. § 250.205 requires federal agencies to review and approve human capital operating plans each year and to update them as needed. The systems and standards that federal agencies must use for human capital planning, implementation, and evaluation are defined in 5 C.F.R. § 250.203, “Strategic human capital management systems and standards.” This regulation requires an agency to “[p]lan for and manage current and future workforce needs.” Additional requirements for agencies to use these systems and standards, as well as any metrics and guidance that the U.S. Office of Personnel Management subsequently provides, are outlined in 5 C.F.R. § 250.204, “Agency roles and responsibilities.” Furthermore, 5 C.F.R. part 250 institutionalizes the requirement for agencies to conduct reviews to identify and monitor human capital measures and targets that inform the progress agencies are making toward meeting their agency-specific goals.

In November 2022, the Office of Personnel Management published the *Workforce Planning Guide* as a resource for agencies to analyze their workforces, identify gaps, and plan and implement workforce planning efforts. In that guidance, the office defines workforce planning as “the systematic process of analyzing and assessing [the workforce] to set targets to mitigate the gaps between the workforce of today and the mission and human capital needs of tomorrow.” The *Workforce Planning Guide* also outlines a model for workforce planning that includes five cyclical steps, as shown in Figure 2.

**Figure 2: Office of Personnel Management’s workforce planning model**



Source: OIG adaptation of model in the Office of Personnel Management’s *Workforce Planning Guide*. (EPA OIG image)

The Office of Management and Budget also establishes the need for effective workforce planning. In section 85 of Office of Management and Budget Circular A-11, *Preparation, Submission, and Execution of the Budget*, dated July 2024, the Office of Management and Budget requires agencies to submit budgets that address strategic human capital management and identify how their requested human capital resources will help them accomplish their programmatic goals. Furthermore, the Office of Management and Budget has issued guidance that similarly highlights workforce planning for IJJA work—and specifically as it relates to the grants workforce. In Office of Management and Budget Memorandum M-22-12, *Advancing Effective Stewardship of Taxpayer Resources and Outcomes in the Implementation of the Infrastructure Investment and Jobs Act*, dated April 29, 2022, the office states that to “achieve IJJA’s goals, and to mitigate risk, agencies will need to engage in substantial efforts to hire qualified program staff and professionals ... as well as mission-support staff including ... grants managers.” It directs federal agencies to build capacity across grants management and strongly encourages short-, medium-, and long-term strategic plans to assess workforce needs to achieve IJJA goals.

Additionally, according to the U.S. Government Accountability Office’s *Standards for Internal Control in the Federal Government*, also known as the Green Book, dated May 2025, an effective internal control system requires proper control activities and documentation, such as a strategic workforce plan that manages human capital, establishes measures, and assesses risks. The Green Book also states that documentation of an internal control system, including management of human capital, provides a means for agencies to retain organizational knowledge, mitigate the risk that only a few people possess that knowledge, and communicate that knowledge as needed to external parties.

### ***EPA Guidance Directs the Agency’s Workforce Planning, Including Workforce and Workload Analyses***

According to the EPA’s two most recent workforce plans, *U.S. Environmental Protection Agency Workforce Plan 2020-2022* and *U.S. Environmental Protection Agency Workforce Plan 2023-2025*, Agency senior leaders are charged with setting the strategic workforce direction for each organizational component so that it is aligned with the agencywide workforce direction, developing plans that address competency gaps and human resource infrastructure, communicating and implementing the plans and related strategies, monitoring workforce progress against milestones and measures, and making adjustments to address new workforce issues.

As required by 5 C.F.R. § 250.205, the EPA developed a human capital operating plan for FY 2022 through FY 2026, which aligns the Agency’s goals for human capital with its strategic plan for that same time period. It also aligns the EPA’s workforce efforts with the Office of Personnel Management’s human capital guidance. In addition to identifying milestones and responsible parties for human capital efforts, the human capital operating plan engages all organizational units in the management of the EPA’s workforce and ties human capital to the EPA’s annual performance plan goals. Also in the human capital operating plan, the EPA notes that it uses the review process required by 5 C.F.R. part 250 to monitor, measure, analyze, and evaluate the effectiveness of its human capital operating plan and that it adjusts the plan based on feedback from senior leaders, including the director of human resources, the chief human capital officers, and the applicable principal deputy assistant administrators.

The Agency has two separate but related efforts for workforce and workload analyses. First, the Office of Finance and Administration’s Office of the Chief Human Capital Officer leads *workforce* analysis and planning efforts. Workforce analysis looks at the EPA’s workforce across mission-critical occupations to assess retirement eligibility; turnover; and management issues, such as recruitment and retention. Workforce analysis includes identifying current and future gaps in workforce size and skills to ensure that the Agency has a cadre of talent available to meet its mission and achieve its current and future goals and objectives. Second, the Office of Finance and Administration’s Office of Financial Operations and Management leads agencywide *workload* analysis efforts, which examine the distribution of work among the EPA’s workforce and the number of people needed to complete specific tasks. According to the *EPA Financial Resources and Operating Guide – Administrative Control of Appropriated and Other Funds*, Agency programs should use workload analyses to conduct financial and performance planning, prioritize and assign tasks, and quantify the impacts of reduced funding or staffing.

In response to a recommendation from the Government Accountability Office,<sup>4</sup> the OCGO has conducted semiannual workload analyses of grant specialists and project officers since 2018. To perform these analyses, the OCGO reviews the EPA’s grants management workload every April and November using data from the Grants DataMart for all active grants at the time of the data pull. It then issues an internal report that offers an overview of the workload for the grants workforce throughout the Agency. The OCGO first incorporated workloads specifically associated with IJA and IRA grants into its analysis for the spring 2023 semiannual grants workload report.

#### The Grants DataMart

The Grants DataMart is a web-based EPA data warehouse designed to provide managers with efficient access to grants data stored in disparate EPA systems. The data warehouse brings together grants information, including award records and related financial data, from these disparate systems into one place and allows staff and managers to run standard and ad hoc reports on grants to support analysis, reporting, and decision-making.

## Responsible Offices

The EPA Office of the Administrator is led by the EPA administrator, who is tasked with overseeing the Agency’s overall leadership and direction to fulfill the EPA’s mission of protecting human health and the environment. The deputy administrator is the second in command and serves as the chief operating officer by managing the Agency’s daily operations, such as the budget, the regulatory process, and administrative matters. The deputy administrator’s primary responsibilities include executing the president’s and administrator’s strategic plan for the Agency and ensuring that the Agency’s offices are delivering programs and services in an effective and efficient manner. Because multiple EPA offices are involved in workforce planning, and grants workforce planning specifically, the deputy administrator would ultimately be responsible for workforce planning.

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<sup>4</sup> Government Accountability Office, [GAO-17-144](#), Grants Management: EPA Partially Follows Leading Practices of Strategic Workforce Planning and Could Take Additional Steps (2017).

The Office of Finance and Administration leads the Agency's core support functions and is responsible for promoting efficiency, coordination, and customer service and for safeguarding facilities and critical assets. The office manages procurement, including contracts, human resources, information technology, and information management, and it oversees workforce planning and grants management. The Office of Finance and Administration has five offices that have a role in workforce planning for the Agency:

- The Office of the Chief Human Capital Officer drives the Agency's strategic human capital initiatives, including workforce planning, by leveraging data and analytics to align employee development and professional experiences with the Agency's culture, mission, and goals. This office also oversees workforce management and collaborates with leadership to set priorities; allocate resources; and manage key human resource functions, such as hiring, benefits, and personnel security.
- The OCGO develops national policies, guidance, and training; provides support to grant management offices; administers grants and cooperative agreements for programs in headquarters; and manages the Agency's suspension and debarment program. The OCGO also assesses whether the EPA has sufficient grant specialists and resources to properly manage grants. The OCGO does not make resource determinations regarding project officers.
- The Office of Resources and Information focuses on matters related to program management, budget, human resources, communications, workforce development programs, and administrative operations.
- The Office of Financial Operations and Management manages the Agency's budget and financial systems and reports on strategic planning and performance requirements.
- The Office of Budget and Performance serves as the EPA's central budget office and handles budget formulation, execution, and resource planning at the national level. For example, for FY 2024, the Office of Budget and Performance managed the EPA's approximately \$9.2 billion budget, which allocated funding for over 15,000 employees.

According to the Agency, the EPA offices that manage grant awards make decisions about resource allocations regarding project officers. For example, the EPA's regional Water Divisions work with the Office of Water national program office in headquarters to identify resource needs for their respective regional programs. The Office of Water is the national program office specifically responsible for ensuring safe drinking water and surface water, as well as for providing program-specific guidance and information to project officers who manage grants for the office. In spring 2025, of the EPA's 8,581 grants valued at around \$78.3 billion, the Office of Water and its regional Water Divisions managed 3,643 of them, with an approximate value of \$36.1 billion. These water-related grants were awarded under 44 grant programs, including the Clean Water and Drinking Water State Revolving Fund Programs, with about 62 percent funded through the IJA.

## Scope and Methodology

We conducted this performance audit from January 2024 to September 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We assessed the internal controls necessary to satisfy our audit objective.<sup>5</sup> In particular, we assessed the internal control components—as outlined in the Government Accountability Office’s Green Book—significant to our audit objective. Any internal control deficiencies that we found are discussed in this report. Because our audit was limited to the internal control components deemed significant to our audit objective, it may not have disclosed all internal control deficiencies that may have existed at the time of the audit.

We reviewed the EPA’s grants workforce planning under annual appropriations and in response to supplemental appropriations from the IJJA and the IRA. We examined the requirements for the EPA to conduct workforce planning, how the Agency analyzes the grants workload, and prior recommendations about the grants workload from EPA OIG and Government Accountability Office reports.

We analyzed the OCGO’s semiannual grants workload reports from 2018 through 2025 to identify any trends in the number of Agency grants, the total value of those grants, and the average workload per grant specialist and project officer by region and program office. This analysis allowed us to identify the typical grants workload for annual appropriations and how those workloads changed to encompass supplemental appropriations.

We selected one EPA program office and two EPA regions for further analysis based on the total number and value of grants that they awarded, the number and value of IJJA and IRA grants that they awarded, and the average workload of their grant specialists and project officers. We obtained this information from the OCGO’s semiannual grants workload reports from spring 2022 to fall 2023. The program office that we selected, the Office of Water, had the largest number of project officers and managed the third highest number of awards among the Agency’s headquarters-based national program offices in that time frame; it also awarded the largest portion of IJJA funds, but it did not award any IRA-funded grants until fall 2024. Of the ten EPA regions, EPA Region 9 generally had the largest number of grant specialists and project officers, the second highest value of IJJA grants, and the highest number of IRA grants in that time frame. The second region that we selected, EPA Region 10, had the lowest number of grant specialists and the largest average number of grants managed per grant specialist in spring 2022, with workloads nearly three times above the OCGO-established benchmark of no more than 60 grants. Additionally, Region 10 had the second largest number of project officers during the spring 2022

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<sup>5</sup> An entity designs, implements, and operates internal controls to achieve its objectives related to operations, reporting, and compliance. The Government Accountability Office sets internal control standards for federal entities in GAO-14-704G, *Standards for Internal Control in the Federal Government*, issued September 10, 2014.

through fall 2023 time frame. Within both regions, we focused on the Water Divisions to better understand workforce planning at different levels of the Agency in a single program area. As of the spring 2025 semiannual grants workload report, the Region 9 Water Division oversaw about \$4.1 billion across 409 grants that were awarded under 18 grant programs, while the Region 10 Water Division managed approximately \$1.6 billion across 284 grants that were awarded under 21 grant programs. These regional grants were funded by both annual and supplemental appropriations.

We reviewed relevant criteria, background, and internal and external prior reports, and we analyzed and summarized the information we gathered. We interviewed officials and staff from the Office of Finance and Administration's Offices of Resources and Information, the Chief Grants Officer, the Chief Human Capital Officer, Financial Operations and Management, and Budget and Performance about the Agency's workforce planning and workload analysis, including their resource allocation process, implementation of resource allocation recommendations, and regional communication efforts. We interviewed officials and staff in the Office of Water and the Water and Mission Support Divisions in Regions 9 and 10 to inquire about their grants oversight and management workload, the impacts of the supplemental appropriations, grants workforce planning and analysis, and grants workload analysis.

## Prior Reports

In EPA OIG Report No. [22-N-0055](#), *Considerations for the EPA's Implementation of Grants Awarded Pursuant to the Infrastructure Investment and Jobs Act*, issued on August 11, 2022, we highlighted that deficiencies in the EPA's grants administration and oversight could be grouped into the following three areas for improvement: enhancing the grants oversight workforce and strengthening monitoring and reporting; establishing and implementing comprehensive guidance and detailed work plans, as well as improving communications; and requiring adequate documentation to support grant payments. The report emphasized that the EPA needed to address these internal control weaknesses before administering and overseeing the more than \$55 billion in IJA appropriations that it would receive for state and tribal grants. The report highlighted findings from prior OIG and Government Accountability Office reports issued from FY 2017 through FY 2021, did not identify new deficiencies, and did not include any recommendations for the Agency to implement.

In EPA OIG Report No. [20-P-0126](#), *EPA Did Not Accurately Report Under the Grants Oversight and New Efficiency Act and Needs to Improve Timeliness of Expired Grant Closeouts*, issued on March 31, 2020, we reported that the EPA faced employee shortages and turnover issues. According to the report, employee shortages increased the grant specialists' workload and limited the availability of staff to perform grant closeouts during periods of high-volume grant awards. As a result, the closeouts were delayed, which increased the risk of taxpayer dollars being spent improperly and decreased the Agency's ability to demonstrate accountability. The report recommended that the then-Office of Mission Support, among other things, establish controls to verify that it is accurately reporting grants information and implement a policy to escalate grant closeouts that have been delayed for one year or longer. In December 2020, the EPA said that it implemented the agreed-to corrective actions for the recommendations.

The Government Accountability Office issued Report No. [GAO-21-150](#), *EPA Grants to Tribes: Additional Actions Needed to Effectively Address Tribal Environmental Concerns*, in October 2020 and found that EPA and tribal grant recipients identified staffing and other challenges related to EPA grants. These challenges included heavy workloads for EPA staff and a high turnover of EPA staff, which created additional work for the already overworked tribal staff working on EPA grants. The report also said that, according to 2019 EPA workforce data, the EPA's grant specialists were understaffed by approximately 15 percent. Of the five recommendations issued in this report, three are related to the grants workforce, including that the EPA create and distribute grants management materials and guidance for grant specialists, project officers, and tribes. As of October 2024, the EPA had implemented all corrective actions and closed the recommendations.

The Government Accountability Office issued Report No. [GAO-17-144](#), *Grants Management: EPA Partially Follows Leading Practices of Strategic Workforce Planning and Could Take Additional Steps*, in January 2017. This report said that from FY 2006 through FY 2015, staffing levels for the EPA grants workforce generally declined, with the number of grant specialists and project officers who entered information about grant actions into the Agency's grants system declining by 20 percent and 41 percent, respectively. The report issued five recommendations to the EPA, including that the Agency develop documented processes that its offices can use to collect and analyze data about the grants workload, which can then be used to inform staff allocations. According to the Government Accountability Office's website, all five recommendations were closed with corrective actions implemented as of May 2019.

## Chapter 2

# The EPA Needs to Improve Grants Workforce Planning

While the EPA conducted high-level agencywide workforce planning in accordance with federal requirements, it did not conduct specific grants workforce planning for its annual and supplemental appropriations. The EPA's two most recent workforce plans highlight the need for workforce planning at all levels of the Agency. Also, Office of Management and Budget Memorandum M-22-12 strongly encourages workforce planning specifically for IJA programs. However, the EPA did not develop an agencywide plan to address its grants workforce needs in the normal course of business, nor did it develop a plan to address the specific impacts of supplemental appropriations on its grants workforce, such as workload challenges created by the increased volume of grants. The Agency also lacks workload benchmarks that reflect current federal requirements for grants management, as well as a detailed, written procedure outlining how to conduct semiannual workload analyses. Decentralized processes and limited resources impact how the Agency conducts workforce planning. Until the EPA improves its grants workforce planning, the Agency may not be able to adapt to workload needs related to supplemental appropriations, to award or administer grants in a timely manner, and to mitigate the risks of improperly managed grants.

### **The EPA Has Not Conducted Workforce Planning for Its Grants Workforce**

The EPA conducted high-level agencywide workforce planning, but it did not conduct specific grants workforce planning to address current and future needs or to manage the volume of grants under annual and supplemental appropriations. From 2018 to May 2025, supplemental appropriations increased the number and value of grants that the Agency manages by about 56 percent and 338 percent, respectively. However, the Agency has not established a workforce plan for grants personnel, updated its grants workload benchmarks, or formally documented a process for conducting workload analyses.

### ***The EPA Has Taken Broad Workforce Planning Steps, but Efforts Related to the Grants Workforce Are Dispersed Among Different Offices***

The Agency has not applied workforce planning efforts specifically to grants management. The *FY 2022–2026 EPA Strategic Plan* integrated workforce planning broadly into the Agency's priorities, and the Agency has met various federal requirements, such as developing its *FY 2022–2026 Human Capital Operating Plan*, its *EPA Workforce Plan 2020–2022*, and its *EPA Workforce Plan 2023–2025*. The Agency uses these agencywide workforce planning documents to determine the needs of its workforce, but these high-level documents are not detailed enough to accurately identify the staffing needed to administer the EPA's grant programs and manage the billions of dollars in grants that the EPA awards. The EPA's *Grants Management Plan 2021–2025* encourages collaboration across the Agency to improve workload management and emphasizes the need for workforce planning through optimizing

information technology systems, improving efficiency of grants management, and reducing organizational burden on grants staff. This plan does not, however, specifically include grants workforce planning and does not discuss the impact of workloads on the grants workforce. Additionally, the EPA's *2024 Retention Audit Report*, which focuses on the Agency's efforts to retain skilled personnel from FY 2019 through FY 2024, does not specifically review or mention retention of grants workforce staff. According to the EPA OIG's three *Infrastructure Investment and Jobs Act Progress Reports* published as of June 2025,<sup>6</sup> staffing and grants management and oversight are significant challenges for the Agency and its implementation of IJJA grant programs. Moreover, prior oversight reports published by the EPA OIG and the Government Accountability Office indicate that grants management had been a challenge for the Agency even before the EPA received the supplemental IJJA and IRA appropriations.

Even so, Agency officials from the Office of Finance and Administration's Office of the Chief Human Capital Officer informed us that, instead of specific grants workforce planning, they prioritized succession management plans for each EPA office, which do address current and future workforce needs and challenges for the most critical positions. The former Office of Mission Support, which was reorganized under the Office of Finance and Administration, identified grant specialists as critical to the success of the EPA's current and future efforts; however, project officers are not part of the office or its succession management plan. And although project officers serve a crucial role in ensuring that recipients perform the technical work requested under the grants to meet their intended purpose and to further the EPA's mission to protect human health and the environment, project officers are not explicitly identified as critical positions by the Office of Water in the *Office of Water Succession Management Plan*. The Office of Water's succession management plan does identify several job series, such as environmental protection specialists and engineers, as critical depending upon the program-specific expertise needed to support a given project, and these staff may also serve as project officers. Even as these succession plans identify some grants workforce positions as critical, the *EPA Workforce Plan 2023–2025* does not discuss either the grant specialist or the project officer positions or functions.

While the former Office of Mission Support and Office of the Chief Financial Officer gathered information from offices and regions across the EPA for agencywide workforce planning efforts, the EPA has not developed a plan to address its specific grants workforce needs. Different program offices and regions have taken decentralized steps to address the workload for grants administered under annual and supplemental appropriations. According to managers in the Office of Water and the Office of Finance and Administration, program and regional offices throughout the Agency have established contractual agreements to help manage tasks that are not inherently governmental functions associated with grants management, used special hiring authorities for staffing, and reorganized program offices to better administer new grant programs. The EPA has also issued guidance that discusses resource allocations and staffing associated with implementing programs funded by supplemental appropriations.

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<sup>6</sup> EPA Off. of Inspector Gen., [Infrastructure Investment and Jobs Act Progress Report—Year One](#) (2023); EPA Off. of Inspector Gen., [24-N-0026](#), *Infrastructure Investment and Jobs Act Progress Report—Year Two* (2024); EPA Off. of Inspector Gen., [25-N-0038](#), *Infrastructure Investment and Jobs Act Progress Report—Year Three* (2025).

## ***The EPA Has Not Updated Its Workload Benchmarks or Documented a Process for Conducting Its Workload Analysis***

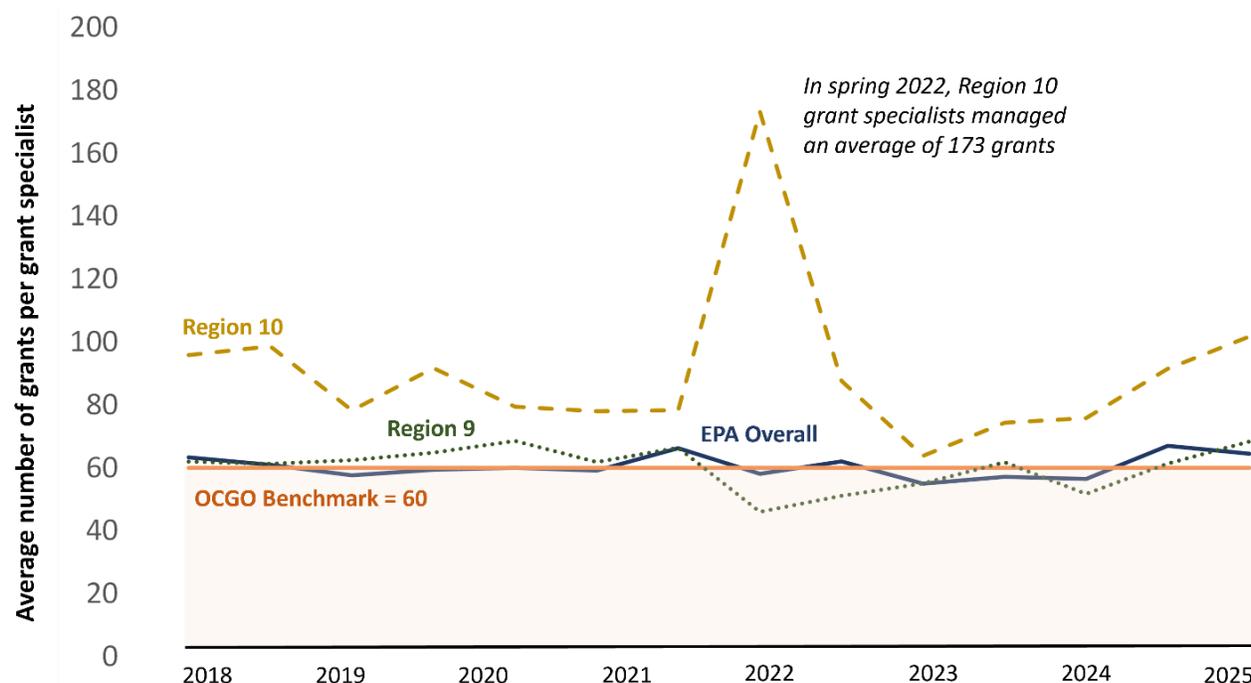
The workload for grant specialists and project officers has, at times, varied significantly from 2018 through 2025, but the Agency has not updated its benchmarks or formally documented how it conducts its semiannual workload analyses since 2005. The OCGO's semiannual workload analysis for project officers and grant specialists reviews the range of awards assigned to the grants workforce, which is supposed to be no more than 60 grants managed by a grant specialist and from three to 19 grants managed by a project officer. However, these benchmarks are based on an EPA-funded study completed by a contractor in April 2005—more than 20 years ago. They do not account for changes in federal grants requirements since the study was conducted. Additionally, the OCGO has not formally documented the process that it uses to conduct the semiannual workload analyses, including how it queries the EPA's Grants DataMart for the workload data.

Figures 3 and 4 show the average grants workload for grant specialists and project officers from 2018 through 2025. The number of grant specialists and project officers increased 54 percent and 45 percent, respectively, between August 2018 and spring 2025. For *grant specialists*, as shown in Figure 3, the overall average number of grants managed during this time frame varied agencywide but generally fell under the OCGO's benchmark of 60 grants per grant specialist; however, several regions, including Region 10, were consistently above the benchmark. Region 10 grant specialists exceeded the benchmark in spring 2022, overseeing an average of 173 grants each—nearly three times the OCGO's benchmark. One Region 10 grant specialist whom we interviewed indicated being unable to complete all required grants management tasks for assigned grants because the workload was too high. The grant specialist also stated that the high turnover of other grant specialists in the region during this time impacted workloads. While Region 10 decreased the average workloads for its grant specialists to about 92 grants in fall 2024 by restructuring its grants section and hiring additional staff, by spring 2025 the averages had increased again to nearly 102 grants per grant specialist.<sup>7</sup> Figure 3 does not show that, as reported to us by the manager of its Mission Support Division, Region 10 also lost six grant specialists between January and September 2025, which increased the average workload to 180 grants per grant specialist. Additionally, according to the manager of Region 9's Mission Support Division, Region 9 lost four senior grant specialists and two managers by September 2025 because of the Deferred Resignation Program, which resulted in the region's remaining 13 grant specialists managing about 90 grants each.

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<sup>7</sup> As mentioned previously, grant specialists do not sit within the program offices, so an analysis of grant specialists within the Office of Water is not applicable or possible.

**Figure 3: Management of grants by the EPA’s grant specialists, 2018–2025**

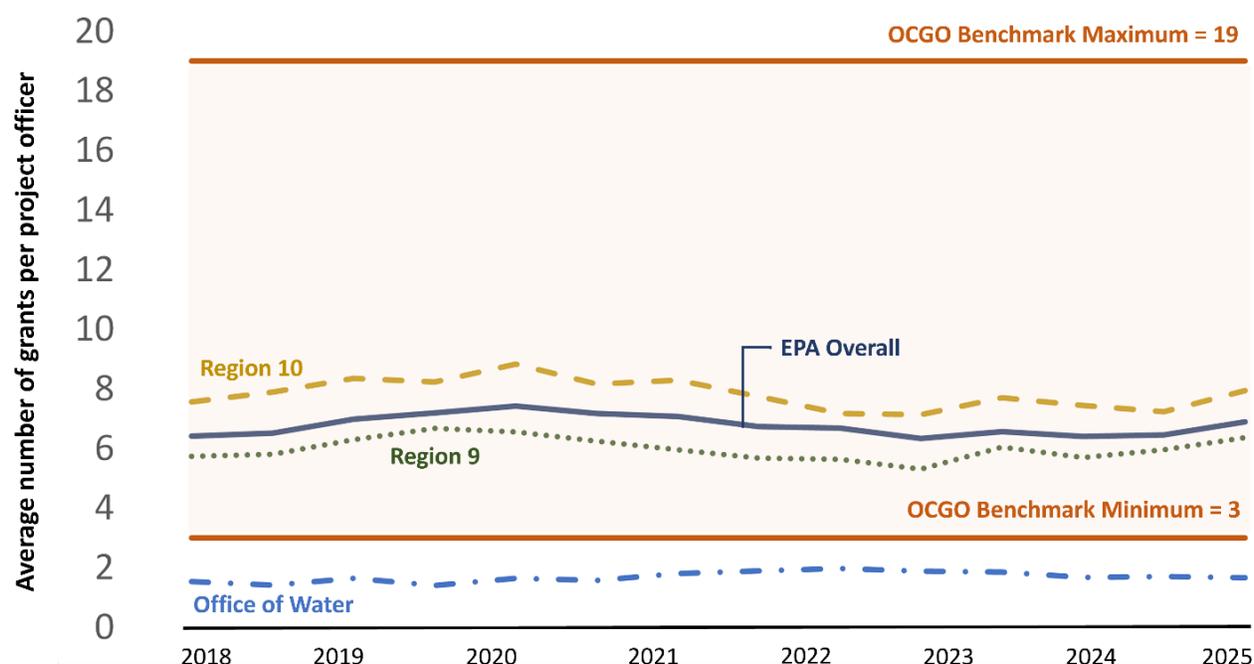


Source: OIG analysis of the OCGO’s semiannual grants workload data, 2018–2025. (EPA OIG image)

Note: The impact of changes in Agency priorities, Agency reorganization efforts, and staffing turnover since January 2025 on grant specialists’ workloads are not fully reflected in this figure.

For *project officers*, as shown in Figure 4, the overall average grants workload across the EPA during this time frame remained within the OCGO’s established benchmark of three to 19 grants. The average workloads for project officers in all program offices and all regions did not exceed the benchmark, with the Office of Water averaging two grants per project officer and Regions 9 and 10 averaging from six to seven grants per project officer. However, like Figure 3, Figure 4 does not show the impact of restructuring efforts like the Deferred Resignation Program on project officer workloads from January to September 2025. The impact of such restructuring efforts varied within the Office of Water and Region 9 and Region 10 Water Divisions. The Office of Water’s drinking water and wastewater management offices underwent significant staffing changes, which impacted the number of project officers in those headquarters offices and regional divisions. Managers in these offices told us that despite the redistribution of responsibilities and the training of additional staff to act as project officers, they expect increased workloads and slowed grant program administration to continue into FY 2026. Region 9’s Water Division lost six project officers but reassigned their workloads to other certified and experienced project officers within the division. In Region 10’s Water Division, the loss of ten project officers increased the average workload per project officer from ten to about 13 grants, which is still below the OCGO workload benchmark of 19 grants per project officer. Furthermore, at least one office within the Office of Water not directly affected by restructuring efforts still experienced impacts. The Office of Water’s Wetlands, Oceans, and Watersheds Office maintained stable staffing with no turnover in project officers from January to September 2025, but it nevertheless experienced increased workloads and slowdowns, which the office expects to continue into FY 2026.

**Figure 4: Management of grants by the EPA’s project officers, 2018–2025**



Source: OIG analysis of the OCGO’s semiannual grants workload data, 2018–2025. (EPA OIG image)

Note: The impact of changes in Agency priorities, Agency reorganization efforts, and staffing turnover since January 2025 on project officers’ workloads are not fully reflected in this figure.

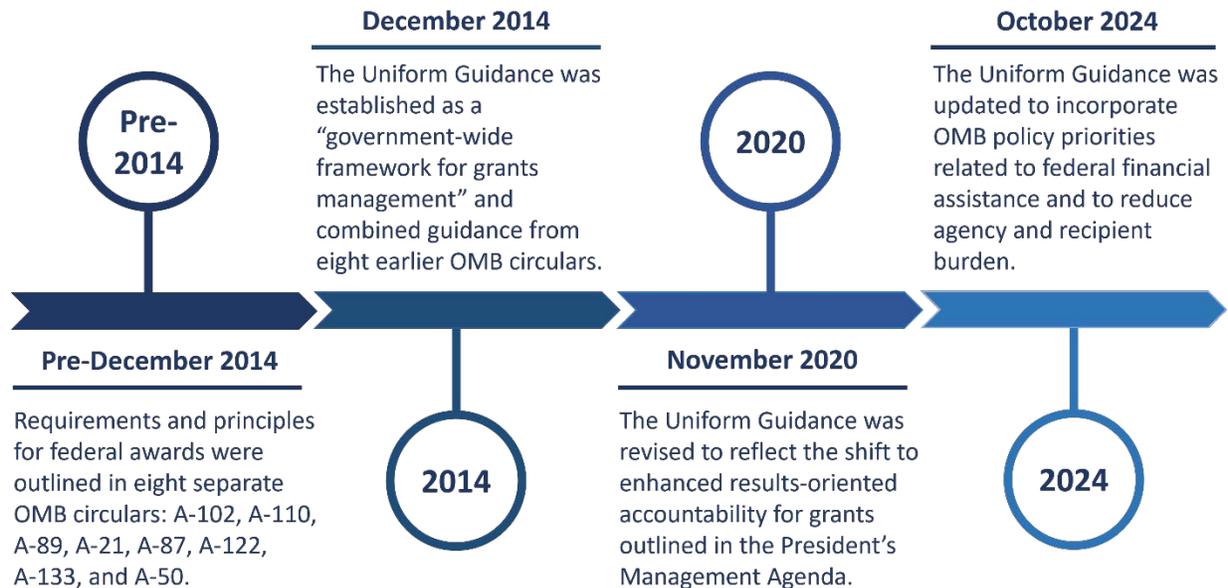
The rescission of the EPA’s unobligated IRA funds after July 2025, in accordance with the One Big Beautiful Bill Act, is also not captured in the workload analyses shown in Figures 3 and 4. The rescission of unobligated IRA funds had minimal impact on the Office of Water’s grants workload, since the Office of Water only managed one IRA grant, which was closed in March 2025. However, according to staff from their respective Mission Support Divisions, Region 9 had approximately 70 IRA grants totaling approximately \$380 million and Region 10 had 37 IRA grants totaling more than \$301 million that were terminated. Closing out these grants increased the workloads of both grant specialists and project officers in these two regions. In the long term, rescinding the unobligated IRA funds may decrease the overall workloads for the grants workforce.

Federal grants management requirements have changed since the 2005 study that the EPA used to establish its workload benchmarks for its grants workforce. These revised requirements may have impacted the scope of the grants workforce’s workload.<sup>8</sup> One OCGO manager whom we interviewed agreed that the federal grants management requirements, as well as the complexity of grants, had changed over the years. In December 2013, eight Office of Management and Budget circulars that addressed administrative requirements, audits, and cost principles were combined to create the Uniform Guidance. The Uniform Guidance became effective in December 2014 and is periodically reviewed and updated. For example, in 2020, the Office of Management and Budget revised sections of the Uniform

<sup>8</sup> Our audit scope did not include assessing whether the workloads of the grants workforce increased or decreased because of the revised federal grants management requirements.

Guidance related to federal grants and agreements. Effective November 2020, these revisions reflected a shift in the President’s Management Agenda toward enhanced results-oriented accountability for grants. In April 2024, the Uniform Guidance was revised to, among other things, increase multiple thresholds that trigger additional requirements and clarify requirements for agencies and recipients. These revisions, which an April 2024 White House press release called the “most substantial” to the Uniform Guidance to date, became effective in October 2024. A timeline of the changes to federal grants requirements is pictured in Figure 5.

**Figure 5: Timeline of significant changes to federal grants management requirements since 2005**



Source: OIG summary of significant changes to federal grants management requirements. (EPA OIG image)

Notes: All dates reflect when the changes became effective. OMB = Office of Management and Budget.

Lastly, the EPA has not formally documented its process for conducting the semiannual workload analysis for project officers and grant specialists, including how it queries the Grants DataMart for grants-related data, which means the process and the resulting workload analyses are not transparent and may not provide a comprehensive picture of the grants workload. A formally documented process is especially necessary because at the beginning of our audit only one person conducted the semiannual workload analyses. During our audit work, the EPA did begin training one other person as a backup for conducting the semiannual workload analyses, but the OCGO still lacks a formally documented process.

The semiannual grants workload report summarizing the results of each workload analysis shows the total number of active awards, the total dollars managed, and the number of grant specialists and project officers for each program and regional office. It also breaks down the number of active awards and dollars managed per program and regional office. There are limitations to the semiannual workload analysis, though. For example, the focus on active grants discounts the workload associated with assisting new grantees, who pose a risk due to their lack of experience, throughout the grant life cycle; with establishing new grant programs, which require additional time to initiate; and with closing out grants,

which includes preparing reports and reconciling financials. While the Office of Financial Operations and Management and the OCGO within the Office of Finance and Administration have worked together to develop models to look at these considerations, they have not updated the workload benchmarks.

The OCGO distributes the semiannual grants workload reports to the regions and headquarters via the Grants Management Council to provide information that can guide managers in the allocation of grant workforce resources.<sup>9</sup> The OCGO also shares the semiannual grants workload reports on an internal Sharepoint page. However, during our interviews with Region 9 and Region 10 Water Division staff, we learned that not all regional officials and project managers were aware of the OCGO's workload analyses. One Water Division manager who was aware of the semiannual grants workload reports reported never actually seeing one. Staff in the regions' Mission Support Divisions appeared to be more aware of the workload reports. Without a more thorough communication strategy for sharing the semiannual grants workload reports, managers of grant specialists and project officers may not have data about the grants workload to inform their workforce planning efforts.

By formally documenting its semiannual workload analysis process, such as how it queries the EPA's Grants DataMart for grants-related data and how it shares the analyses with the grants workforce, the EPA may equip managers with the capability to consistently conduct timely workload analyses and reporting. Additionally, when managers follow a documented process, the EPA should have more reliable data to conduct agencywide analyses of the grants workload.

## **The EPA's Decentralized Processes and Limited Resources Impact Its Grants Workforce Planning Efforts**

The EPA's lack of a specific workforce plan for grants personnel may stem from its decentralized grants workforce planning, limited resources, and reliance on high-level agencywide workforce planning. Because the grants workforce is spread throughout the Agency and because grants staff work under various job series, there is no centralized agencywide grants workforce planning document that addresses both grant specialists and project officers. The workforce planning documents that do mention at least part of the grants workforce do not fully address the impact of the number of grants managed by grant specialists and project officers agencywide, the increase in the workload due to supplemental funding, or how the EPA plans to manage its grants workforce in the future. A grants workforce plan will bring together the various offices involved, including program and regional offices; guide the Agency's efforts in a manner that incorporates the entire workload associated with administering and overseeing grants; establish workforce goals; foster information sharing; and monitor and evaluate progress toward those workforce goals.

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<sup>9</sup> The Grants Management Council—which includes headquarters and regional senior resource officials, the director and deputy director of the OCGO, and the EPA's grants competition advocate—focuses on planning, coordination, and priority-setting for grants management. The council provides guidance to the EPA about strategies to accomplish the goals in the EPA's *Grants Management Plan*.

According to the Agency, competing priorities and limited staff and time hamper its ability to develop an agencywide grants workforce plan, establish a written process for the semiannual workload analysis, and perform an updated benchmark study for the grants workforce. The EPA said that formally documenting the process related to the grants workforce and workload analysis would require significant time not only to create but also to vet. And while the OCGO director said that a new benchmark study would be beneficial, we were told that it would also be expensive and difficult.

## **The EPA Cannot Address the Risks of Grants Management Without Grants Workforce Planning**

If the EPA does not improve its approach to grants workforce planning, it will not be fully effective at hiring and staffing these roles. Without an agencywide grants workforce plan or a documented grants workload analysis process, the EPA has not fully adhered to federal guidance regarding agencywide grants management across its program and regional offices and for supplemental appropriations. For example, the Agency does not follow Office of Management and Budget Memorandum M-22-12's strong encouragement that federal agencies build grants management capacity and develop strategic plans to assess workforce needs to implement the IJA. As a result, the Agency may not be able to mitigate challenges to its grants management efforts, putting billions of taxpayer dollars at risk. These challenges include ensuring that it has sufficient resources for managing grant activities, adapting to staffing demands related to supplemental appropriations, administering grants in a timely manner, and addressing the risks of improperly managed grants. Considering the significant amount of EPA funds being awarded through grants, the influx of new grantees, and the number of newly established grant programs, workforce planning focused on grants management would be a worthwhile investment to help ensure the efficiency and effectiveness of the EPA's grant programs.

With better grants workforce planning, including the implementation of a specific grants workforce plan, the Agency could ensure that staffing is sufficient to allow the timely completion of important tasks associated with grants administration and oversight. Additionally, with updated benchmarks, the Agency would be able to better determine whether current workload expectations accurately reflect the reality of grants-related tasks and responsibilities. Changes to federal grants requirements since 2005 reinforce the need for the Agency to review and, if necessary, update the benchmarks. Furthermore, with a documented process that details how the Agency performs the workload analysis, the EPA could equip managers with the capability to conduct their own timely analyses and reporting. A documented process would provide consistency in the collection and analysis of agencywide data about grants workload and staffing.

Ultimately, improvements are needed in the Agency's grants workforce planning efforts for both annual and supplemental appropriations. If the EPA is unable to acquire and maintain a sufficient grants workforce, it is at risk of mismanaging an increase in grants activity and failing to fulfill its mission.

## Recommendations

We recommend that the deputy administrator:

1. In collaboration with the chief financial officer, the chief administrative officer, the chief human capital officer, the chief grants officer, the assistant administrators for program offices, and the regional administrators, develop an agencywide grants workforce plan that includes how the Agency will consider administration, oversight, and workloads for grants funded by annual and supplemental appropriations, as well as how the Agency will manage grants workforce staffing needs in alignment with Office of Management and Budget Memorandum M-22-12, the EPA's workforce plans, and 5 C.F.R. part 250. An agencywide grants workforce plan will help reduce the risks of improperly managed grants.

We recommend that the chief administrative officer:

2. In coordination with the chief financial officer, reassess the Agency's established benchmarks for the grant specialist and project officer workloads. If necessary, revise the benchmarks to reflect any changes in workloads that resulted from revised federal grants management requirements to more accurately reflect the workloads associated with grants-related management and oversight responsibilities.
3. Develop, and share with the grants workforce, guidance that outlines the specific steps, processes, and data queries used to analyze the semiannual grants workload data from the pre-award phase to the closeout phase to increase consistency in the analysis of workload data.
4. Develop a communication strategy for the semiannual grants workload reports, including a schedule to consistently share these reports with the grants community involved in workforce planning and to increase awareness of these reports, which will help inform grants workforce allocation decisions.

## Agency Response and OIG Assessment

The principal deputy assistant administrator for Finance and Administration provided the Agency's response to our draft report on October 8, 2025, which included input from program offices, the Office of the Administrator, and the Office of Finance and Administration.<sup>10</sup> The Agency disagreed with Recommendations 1 and 2, which are unresolved with resolution efforts ongoing. The EPA agreed with Recommendations 3 and 4, which we consider resolved. We also reviewed the Agency's comments and incorporated its edits and comments in the revised report, as appropriate. Appendix C contains the Agency's official response to our draft report.

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<sup>10</sup> The Agency's response was written before the former Office of Mission Support was restructured as part of the new Office of Finance and Administration. Any mentions of the Office of Mission Support and the Office of Grants and Debarment in the Agency's response should be understood to be referencing their respective successors.

For Recommendation 1, the Agency indicated that it did not agree with the recommendation because the grants workload and workforce have changed significantly since we conducted the audit. Additionally, the Agency said that it predicts that grant funding will “contract dramatically” based on the FY 2026 President’s Budget,<sup>11</sup> as well as on the EPA’s rescission of its unobligated balances for IRA -funded grant programs. The Agency stated that, in six to nine months, it will revisit the recommendation once the full impact of the Deferred Resignation Program, retirements, and reorganizations is better known. The Agency also intends to consider appropriate enhancements to its post-award monitoring program to reduce the likelihood of improperly managed grants. Although the Agency does not concur with our recommendation, we still believe that developing a grants workforce planning document would be beneficial to the Agency’s ability to be prepared to administer current and future grants workloads. We believe this because the EPA will continue to manage IJA grants through 2034, will award \$12 billion in new IJA grants in FY 2026, and has lost 113 staff who served as grant specialists and project officers since May 2025. Therefore, we consider this recommendation to be unresolved with resolution efforts in progress.

For Recommendation 2, the Agency disagreed with the recommendation given its prediction of significant changes in grants workloads. It again indicated that it will revisit the recommendation in six to nine months once the impact of the Deferred Resignation Program, retirements, and Agency reorganizations is better known. Although the Agency does not concur with this recommendation, we still believe that reassessing and, if necessary, revising the Agency’s established workload benchmarks for grant specialists and project officers would be useful to the Agency’s current and future workload planning, especially as the grants workforce changes in the future. Therefore, we consider this recommendation to be unresolved with resolution efforts in progress.

For Recommendation 3, the Agency indicated that it concurred with the recommendation. The Office of Finance and Administration’s OCGO will develop, and share with the grants workforce, guidance that outlines the specific steps, processes, and data queries used to analyze the semiannual grants workload data from the pre-award phase to the closeout phase to increase consistency in the analysis of workload data. The Agency expects to complete these corrective actions by June 30, 2026. These corrective actions meet the intent of our recommendation, which we consider resolved with corrective actions pending.

For Recommendation 4, the Agency indicated that it concurred with the recommendation. The Office of Finance and Administration’s OCGO said that it would develop a communication strategy for the semiannual grants workload reports, including a schedule to consistently share these reports with the grants community involved in workforce planning and to increase awareness of these reports. The Agency implemented these corrective actions, which met the intent of our recommendation, by December 31, 2025. We therefore consider Recommendation 4 closed with corrective actions completed.

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<sup>11</sup> The Commerce, Justice, Science; Energy and Water Development; and Interior and Environment Appropriations Act, 2026, Pub. L. No. 119-74, which included funding for the EPA, decreased the Agency’s budget by less than 4 percent from the prior year’s annual appropriations. Subsequently, EPA grant programs continued to receive funding.

## Status of Recommendations

Rec. No.	Page No.	Recommendation	Status*	Action Official	Planned Completion Date
1	19	In collaboration with the chief financial officer, the chief administrative officer, the chief human capital officer, the chief grants officer, the assistant administrators for program offices, and the regional administrators, develop an agencywide grants workforce plan that includes how the Agency will consider administration, oversight, and workloads for grants funded by annual and supplemental appropriations, as well as how the Agency will manage grants workforce staffing needs in alignment with Office of Management and Budget Memorandum M-22-12, the EPA's workforce plans, and 5 C.F.R. part 250. An agencywide grants workforce plan will help reduce the risks of improperly managed grants.	U	Deputy Administrator	—
2	19	In coordination with the chief financial officer, reassess the Agency's established benchmarks for the grant specialist and project officer workloads. If necessary, revise the benchmarks to reflect any changes in workloads that resulted from revised federal grants management requirements to more accurately reflect the workloads associated with grants-related management and oversight responsibilities.	U	Chief Administrative Officer	—
3	19	Develop, and share with the grants workforce, guidance that outlines the specific steps, processes, and data queries used to analyze the semiannual grants workload data from the pre-award phase to the closeout phase to increase consistency in the analysis of workload data.	R	Chief Administrative Officer	6/30/26
4	19	Develop a communication strategy for the semiannual grants workload reports, including a schedule to consistently share these reports with the grants community involved in workforce planning and to increase awareness of these reports, which will help inform grants workforce allocation decisions.	C	Chief Administrative Officer	12/31/25

\* C = Corrective action completed.

R = Recommendation resolved with corrective action pending.

U = Recommendation unresolved with resolution efforts in progress.

## Key Definitions

**Annual appropriation:** According to the *EPA Financial Resources and Operating Guide*, the specific amount of money that provides funding for federal agencies and programs authorized by Congress for a single fiscal year. Typically, annual appropriations contain details regarding how the Agency can spend the funding.

**Grant specialist:** According to the EPA's *Assistance Agreement Almanac*, the EPA official designated as the Agency's administrative contact for the grant recipient. The grant specialist provides administrative guidance to grant recipients and project officers, reviews and approves the administrative portion of the application, prepares the assistance agreement, assesses compliance with administrative conditions, performs post-award management activities, and closes out assistance agreements.

**Grants DataMart:** A web-based EPA data warehouse designed to provide managers with a tool to efficiently access grants data stored in disparate EPA systems. The data warehouse brings together grants information, such as award records, related financial data, and other data specific to a grant, from these systems into one place for staff and managers to run standard and ad hoc reports.

**Grants workforce:** Collectively, the EPA's grant specialists and project officers responsible for the administrative and programmatic management and oversight of awarded grants and other assistance agreements.

**Project officer:** According to the EPA's *Assistance Agreement Almanac*, the EPA official designated as the Agency's program contact for the grant recipient. Project officers are responsible for monitoring the programmatic aspects of the project and must have completed project officer training and be certified.

**Supplemental appropriation:** According to the *EPA Financial Resources and Operating Guide*, congressionally passed bills that provide additional funding, usually for emergency purposes like natural disasters. Supplemental appropriations normally also contain specific tracking reporting and other requirements. During the fiscal year, the president may submit to Congress any supplemental appropriation requests that are deemed necessary because of laws enacted after the submission of the president's budget or that are in the public interest, such as assistance after hurricanes and emergency investments like the American Recovery and Reinvestment Act of 2009. The IJA and the IRA are also supplemental appropriations.

**Workforce planning:** According to the Office of Personnel Management, the systematic process of analyzing and assessing an agency's workforce to set targets to mitigate the gaps between the workforce of today and the mission and human capital needs of tomorrow.

**Workload analysis:** According to the *EPA Financial Resources and Operating Guide*, a determination of the number of people or hours of people's time needed to complete particular tasks.

## Grants Workforce Roles and Responsibilities



### Grant Specialists



### Project Officers



#### Pre-award

- Review and approve funding packages.
- Provide guidance to program offices to correct funding packages.
- Work with program offices to improve competition performance.
- Conduct a quality control review of the funding package.
- Approve the funding package submitted by the project officer or return it if it is not acceptable.
- Prepare award document, once funding package is approved.

- Prepare competitive funding announcements and determine special announcement requirements.
- Receive, determine eligibility of, and evaluate applications.
- Select applications for award and manage negotiations and approvals of work plans.
- Prepare the funding package for grant awards and perform quality control reviews.
- Transmit funding package to the grant specialist for review and approval and correct funding package if necessary.

#### Post-award

- Conduct administrative baseline or advance monitoring, to include review of drawdowns of grant funds.
- Ensure recipients take corrective actions to address deficiencies identified in administrative monitoring reports.
- Review and approve amendments to grant awards and prepare new award, if necessary.
- Report suspected fraud to the EPA OIG.

- Conduct programmatic baseline or advance monitoring, to include review of drawdowns of grant funds.
- Ensure recipients take corrective action to address deficiencies identified in programmatic monitoring reports.
- Review recipients' submitted progress reports.
- Review recipients' requests for grant changes and prepare amendments to grant awards, if necessary.
- Report suspected fraud to the EPA OIG.

#### Closeout

- Ensure that administrative requirements have been met.
- Review and approve the required closeout reports submitted by recipients.
- Ensure grants are closed out in a timely fashion.

- Ensure that all technical work is completed and satisfactory and that programmatic terms and conditions have been met.
- Review and approve final technical or progress reports from recipients.
- Complete programmatic closeout of grant in a timely manner.

Source: OIG summary of roles and responsibilities outlined in the EPA's *Assistance Agreement Almanac*. (EPA OIG image)

## Agency Response to the Draft Report



WASHINGTON, D.C. 20460

October 7, 2025

**MEMORANDUM**

**SUBJECT:** Response to the Office of Inspector General Draft Report, Project No. OA-FY24-0042, “Audit of the EPA’s Grants Workforce Planning,” dated September 11, 2025

**FROM:** Michael Molina, Principal Deputy Assistant Administrator  
Office of Mission Support

**TO:** Katherine Trimble, Assistant Inspector General  
Office of Audit

**MICHAEL  
MOLINA** Digitally signed by  
MICHAEL MOLINA  
Date: 2025.10.07  
17:21:35 -04'00'

Thank you for the opportunity to respond to the issues and recommendations in the subject draft audit report. Following is a summary of the U.S. Environmental Protection Agency’s overall position, along with its position on each of the report’s recommendations. We have provided high-level corrective actions and estimated completion dates.

**AGENCY’S OVERALL POSITION**

The agency concurs with recommendations 3 and 4 and does not concur with recommendations 1 and 2. We have attached a technical comments document which explains the agency’s position on several report findings. The EPA’s program offices were included in the review of the EPA’s response to the OIG recommendations, with input received from the Office of the Administrator, Office of Mission Support, and the Office of the Chief Financial Officer.

**AGENCY’S RESPONSE TO DRAFT AUDIT RECOMMENDATIONS**

**Agreements**

No.	Recommendation	High-Level Corrective Action(s)	Est. Completion Date
3	Develop, and share with the grants workforce, guidance that outlines the specific	EPA’s Office of Grants and Debarment (OGD) will develop, and share with the grants workforce,	June 30, 2026

	steps, processes, and data queries used to analyze the semiannual grants workload data from the pre-award phase to the closeout phase to increase consistency in the analysis of workload data.	guidance that outlines the specific steps, processes, and data queries used to analyze the semiannual grants workload data from the pre-award phase to the closeout phase to increase consistency in the analysis of workload data.	
4	Develop a communication strategy for the semiannual grants workload reports, including a schedule to consistently share these reports with the grants community involved in workforce planning and to increase awareness of these reports, which will help inform grants workforce allocation decisions.	EPA's Office of Grants and Debarment (OGD) will develop a communication strategy for the semiannual grants workload reports, including a schedule to consistently share these reports with the grants community involved in workforce planning and to increase awareness of these reports, which will help inform grants workforce allocation decisions.	December 31, 2025

**Disagreements**

No.	Recommendation	Agency Explanation/Response	Proposed Alternative
1	In collaboration with the assistant administrator for Mission Support, the chief financial officer, the chief human capital officer, the assistant administrators for program offices, and the regional administrators, develop an agencywide grants workforce plan that includes how the Agency will consider administration, oversight, and workloads for grants funded by annual and supplemental appropriations, as well as how the Agency will manage grants workforce staffing needs in alignment with Office of Management and Budget Memorandum M-22-12, the EPA's workforce plans, and 5 C.F.R. part 250. An agencywide grants workforce plan will help	EPA does not concur with this recommendation as the grants workload and workforce have changed significantly since this audit was conducted.  EPA will continue to monitor grants workload and workforce and align resources with priorities.	The proposed Office of Finance and Administration (OFA) will revisit in 6-9 months once the full impact of DRP, retirements, reorganizations, etc. are better known. Furthermore, according to the FY26 President's Budget, grant funding for EPA is anticipated to contract dramatically. As such, rather than focus efforts on a shrinking grants workload and workforce, EPA intends to consider appropriate enhancements to its post-award monitoring program to reduce the likelihood of improperly

	reduce the risks of improperly managed grants.		managed grants. Further, most unobligated balances for EPA IRA-funded grant programs have been rescinded thereby reducing any associated risks.
2	In coordination with the chief financial officer, reassess the Agency’s established benchmarks for the grant specialist and project officer workloads. If necessary, revise the benchmarks to reflect any changes in workloads that resulted from revised federal grants management requirements to more accurately reflect the workloads associated with grants-related management and oversight responsibilities.	EPA disagrees with this recommendation given the significant change in grants workload.	The proposed Office of Finance and Administration (OFA) will revisit in 6-9 months once the full impact of DRP, retirements, reorganizations, etc. are better known. Furthermore, according to the FY26 President’s Budget, grant funding for EPA is anticipated to contract dramatically. As such, rather than focus efforts on a shrinking grants workload and workforce, EPA intends to consider appropriate enhancements to its post-award monitoring program to reduce the likelihood of improperly managed grants. Further, most unobligated balances for EPA IRA-funded grant programs have been rescinded thereby reducing any associated risks.

CONTACT INFORMATION

Thank you for the opportunity to review the report. If you have any questions regarding this response, please contact Afreeka Wilson, OMS Audit Follow-up Coordinator, or [wilson.afreeka@epa.gov](mailto:wilson.afreeka@epa.gov) and Caitlin Schneider, AO Audit Follow-up Coordinator, or [schneider.caitlin@epa.gov](mailto:schneider.caitlin@epa.gov).

Attachment: OA-FY24-0042 Draft Report – Technical Comments

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