



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

February 26, 2020

OFFICE OF THE  
ADMINISTRATOR

The Honorable Henry J. Kerner  
Special Counsel  
U.S. Office of Special Counsel  
1730 M Street, N.W., Suite 300  
Washington, D.C. 20036

Re: OSC File Nos. DI-18-3786, DI-18-3820, DI-18-4713, DI-18-4968

Dear Mr. Kerner,

Please accept this letter and the enclosed attachments as the U.S. Environmental Protection Agency's response to your October 4, 2018 letter, which requested that EPA investigate certain allegations made by whistleblowers. Specifically, these allegations concern former Administrator Pruitt's use of agency funds for travel and security, and the EPA's Office of Inspector General's (OIG) role in assessing and managing security threats related to the protection of former Administrator Pruitt.

Pursuant to your October 4, 2018 letter, EPA and the OIG conducted investigations into the allegations in Part A of your letter, the results of which are described below. EPA also coordinated with the OIG regarding the allegations in Part B of your letter, which concern OIG's involvement in assessing and reviewing security threats against former Administrator Pruitt. After conferring with the OIG, EPA referred the allegations in Part B to the Integrity Committee of the Council of the Inspectors General on Integrity and Efficiency (CIGIE). CIGIE is an independent entity within the executive branch charged with addressing integrity, economy and effectiveness issues that transcend individual Government agencies. The results of EPA's referral to CIGIE are addressed in Section V below.

The EPA Administrator has delegated to me his authority to review, sign and submit to your office the Agency's report and findings as required by 5 U.S.C. § 1213 (c) and (d). This letter addresses the investigations that occurred regarding the matters at issue in your October 4, 2018 letter, as well as the results and recommendations stemming from those investigations.

**I. Allegations Concerning Former Administrator Pruitt's Travel Expenses**

According to Part A of your October 4, 2018 letter, the whistleblowers alleged that former Administrator Pruitt "engaged in excessive and improper spending" on travel and security.<sup>1</sup> Prior to receiving your letter, the EPA OIG had opened an investigation into former Administrator

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<sup>1</sup> Letter from Henry J. Kerner to Andrew Wheeler, Oct. 4, 2018, at 2.

Pruitt's travels in response to Congressional requests and hotline complaints.<sup>2</sup> Specifically, the OIG audited the former Administrator's travel for a 10-month period (from March 1 through December 31, 2017), and evaluated: the frequency, cost and extent of the travel; whether applicable EPA travel policy and procedures were followed in processing the travel for the former Administrator and associated staff; and whether EPA's travel policy and procedures are sufficiently designed to prevent fraud, waste and abuse.

The OIG initiated the audit in September 2017 and completed it in November 2018. The OIG performed the audit in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States.<sup>3</sup> During the audit, the OIG obtained and analyzed travel data from the EPA's Compass Data Warehouse, conducted witness interviews, and reviewed the Agency's travel policies and procedures.<sup>4</sup>

On May 16, 2019, EPA's OIG issued an audit report entitled "Actions Needed to Strengthen Controls over the EPA Administrator's and Associated Staff's Travel"<sup>5</sup> (Travel Report). The Travel Report discusses in detail the evidence obtained as the result of the audit as well as the OIG's findings. The OIG found that EPA's travel policy is sufficiently designed to prevent fraud, waste, and abuse, and is consistent with the Federal Travel Regulations (FTR).<sup>6</sup> The OIG also found that "the former administrator's use of military and charter flights was justified and in compliance with EPA policy and the FTR."<sup>7</sup> Thus, the OIG made no recommendations to EPA regarding the use of military or chartered flights.<sup>8</sup>

In the Travel Report, the OIG made a series of recommendations to EPA. The OIG recommended that the Chief Financial Officer (CFO) update the Executive Approval Framework or other EPA policy to include a formal authorized delegate and backup for approval of Administrator-level travel.<sup>9</sup> On June 28, 2018, the CFO updated the Executive Approval Framework to designate approvers for the Administrator's travel, and on July 13, 2018, the OIG verified that the updated Executive Approval Framework was posted on the EPA's intranet.<sup>10</sup>

Regarding the issue of approval of the first/business class exception for the Administrator and trip-by-trip approvals, on February 11, 2019, the Agency's Office of General Counsel (OGC) issued a legal opinion stating that the Controller had implicit authority to grant the exception allowing non-coach travel. The CFO also issued a memorandum redelegating authority to the Controller to retroactively approve the individual trips, on the grounds that there were

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<sup>2</sup> "Actions Needed to Strengthen Controls Over the EPA Administrator's and Associated Staff's Travel," EPA Office of Inspector General, Report No. 19-P-0155, May 16, 2019 ([https://www.epa.gov/sites/production/files/2019-05/documents/\\_epaig\\_20190516-19-p-0155.pdf](https://www.epa.gov/sites/production/files/2019-05/documents/_epaig_20190516-19-p-0155.pdf)). Hereinafter referred to as "Travel Report."

<sup>3</sup> See *id.* at 4.

<sup>4</sup> See *id.* The Compass Data Warehouse is a collection of data from various EPA information systems, including Compass and the Travel Document System. The data in the warehouse are refreshed daily. Therefore, downloads from the warehouse represent accounting system data. See *id.*

<sup>5</sup> See *id.*

<sup>6</sup> See *id.* at 18.

<sup>7</sup> See *id.* at 41.

<sup>8</sup> See *id.* at 43.

<sup>9</sup> See *id.* at 19.

<sup>10</sup> *Id.*



valid security concerns during the travel period in question, which the Controller did.<sup>11</sup> The OIG disagreed with the Agency's position concerning non-coach travel, finding that the Agency had not provided justification or documentation to show valid security concerns related to the travel exception. The OIG recommended that the CFO "implement controls to verify the approving official has adequate authority prior to granting first/business-class exceptions" and "implement controls agencywide to verify that the use of other than coach-class travel is properly justified and documented prior to approval of the travel authorization."<sup>12</sup> EPA disagreed with this recommendation and explained why in its response to the OIG's draft audit report. Specifically, EPA stated to the OIG that it already had sufficient controls in place for first/business class trips. Under EPA policy and in accordance with the FTR, an approved justification is required for first and business-class travel before an exception is granted.<sup>13</sup>

The OIG also recommended that EPA implement controls to require adequate justification for domestic first or business class travel and for domestic carrier, flight, and/or airfare selection when there are no contract fares. Specifically, the OIG recommended that the CFO clarify EPA policy regarding carrier, flight, and/or airfare selection when there are no contract fares.<sup>14</sup> The OIG further recommended that the Chief of Staff implement controls within the Office of the Administrator to require adequate justification for first or business class travel, and for carrier, flight, and/or airfare selection when there are no contract fares.<sup>15</sup> As set forth in EPA's response to the draft audit report, the Agency disagreed with OIG's recommendations because it believes that it has adequate controls in place.<sup>16</sup> For example, EPA's travel policy provides instructions for the use of non-contract carriers. Under the policy, provided the selected fare is compliant with the exceptions for use of non-contract carriers, the traveler can use a noncontract fare. When doing so, the traveler must select a reason for use of the non-contract carrier within the agency's travel system (via a selection option within Concur), along with a justification, prior to approval.<sup>17</sup> Furthermore, the former Administrator issued a memorandum requiring final approval of expenditures over \$5,000 made by agency personnel on his behalf to conduct official duties, and such approval had to occur by two of three individuals: the Deputy Administrator, Chief Financial Officer, or Chief of Staff.<sup>18</sup> This control remains in place. The Agency also noted that all travel accommodations prepared by the Travel Management Center (BCD) are booked in accordance with FTR and the contract with Concur.<sup>19</sup> Accordingly, the Agency maintained that it has adequate controls in place that require adequate justification for non-contract fare flights.

As to international travel, the OIG recommended that EPA "implement controls to verify that international trip reports are accurate and complete."<sup>20</sup> The OIG found that not all travelers submitted international trip reports and that the reports the personnel security division (PSD)

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<sup>11</sup> *See id.*

<sup>12</sup> *See id.* at 24.

<sup>13</sup> *See id.* at 64.

<sup>14</sup> *See id.* at 29.

<sup>15</sup> *See id.*

<sup>16</sup> *See id.*

<sup>17</sup> *See id.* at 64.

<sup>18</sup> *See id.* at 65.

<sup>19</sup> *See id.*

<sup>20</sup> *See id.* at 38.



staff and other staff submitted were sometimes inaccurate and incomplete.<sup>21</sup> In response to the OIG's findings, the EPA notified the OIG that it will release a new version of its Fast International Approval of Travel (FIAT) database that tracks international travel. This new version will be internet-based, allowing users to access it anywhere. It will also send travelers reminders about completing reports.<sup>22</sup> Furthermore, EPA's Office of Management and International Services has been "monitoring trip reports in the Lotus Notes version of FIAT and contacting travelers who have not filed a report within 7 business days to remind them of the trip report requirement."<sup>23</sup> Thus, the OIG determined that its recommendations for international travel reporting were satisfied.<sup>24</sup>

Relatedly, the OIG found that the "use of business-class travel by the former Administrator's PSD agents and other staff for international trips was not always approved in accordance with the FTR and EPA travel policy."<sup>25</sup> The OIG recommended the CFO: (1) implement controls to ensure EPA employees comply with the FTR and EPA policy for first/business-class travel; (2) provide guidance on documentation needed to support approval for first/business-class travel; and (3) identify and review all business-class travel claimed for the staff and PSD agents who accompanied the former Administrator. EPA agreed to provide guidance and subsequently "provided several agencywide training courses in 2018, including one specifically for OA [Office of Administrator] staff and management."<sup>26</sup> EPA disagreed with recommendations one and three, however, because it believed there were sufficient controls in place at the time of approval and relatedly, that the approvals were properly granted.<sup>27</sup>

Finally, the OIG found that nothing in the FTR prohibits making personal stops while traveling for business to other destinations, under FTR § 301-10.7. The OIG found, however, that the travel authorizations did not contain the necessary cost detail and other support needed to substantiate the former Administrator's stops in Tulsa, Oklahoma.<sup>28</sup> Therefore, the OIG concluded that it was "unable to determine whether additional costs were incurred for [] stops in Tulsa the former Administrator made for personal convenience."<sup>29</sup> The OIG recommended that the Chief of Staff "implement controls within the Office of the Administrator to confirm that adequate cost comparisons are provided before approving travel authorizations where an alternative travel method is used (i.e., when the direct or usually taken routes are not used)."<sup>30</sup> The Agency disagreed with this recommendation, stating that sufficient controls were in place to verify proper justification and approval for use of other than coach-class travel. Furthermore, the Agency stated in its response to the draft report that the costs associated with the former Administrator's trips with stops in Tulsa included the most advantageous method of travel.<sup>31</sup>

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<sup>21</sup> See *id.* at 35.

<sup>22</sup> See *id.* at 37.

<sup>23</sup> See *id.*

<sup>24</sup> See *id.* at 38.

<sup>25</sup> See *id.*

<sup>26</sup> See *id.* at 40.

<sup>27</sup> See *id.*

<sup>28</sup> See *id.* at 34.

<sup>29</sup> *Id.*

<sup>30</sup> See *id.* at 35.

<sup>31</sup> See *id.* at 53.

## II. Allegations Concerning Former Administrator Pruitt's Spending on Security

Your October 4, 2018 letter also includes allegations that the Agency engaged in improper spending on former Administrator Pruitt's security.<sup>32</sup> The whistleblowers first alleged that during a trip to Italy in 2017, the Agency "paid at least \$30,000 for a private security detail and accommodations for Pruitt when they could have used U.S. embassy-recommended hotels that met the per diem rate and already had security on-site." EPA's OIG referred this matter to an outside law enforcement agency for investigation and a possible enforcement action. To EPA's knowledge, the outside law enforcement agency ultimately did not pursue any further action on this allegation. Further, the employee who was allegedly responsible for arranging the private security detail retired from the Agency shortly after this matter was referred to an outside law enforcement agency.

The whistleblowers further alleged that EPA spent approximately \$43,000 to install a soundproof booth in former Administrator Pruitt's office. EPA initiated an internal review of this matter upon receiving a letter dated December 21, 2017, from [REDACTED], Managing Associate General Counsel, Government Accountability Office (GAO), inquiring about the purchase of the soundproof booth. GAO's letter stated that "in response to a congressional request," it would be issuing a legal opinion on whether the EPA obligated FY 2017 funds in a manner inconsistent with section 710 of the Financial Services and General Government Appropriations Act, and the Antideficiency Act.<sup>33</sup> To inform their legal opinion, GAO asked EPA to provide additional facts concerning the expenditure and to provide its legal views on the matter.<sup>34</sup> Specifically, GAO sought information on the amount of funds EPA obligated for the privacy booth project, the date on which EPA obligated the funds, and the name and description of the appropriation from which EPA obligated funds for the project. GAO also asked for a description of the project and the statement of work for the contract under which EPA procured the services.<sup>35</sup>

In response, EPA gathered facts and documentation pertaining to the purchase of the soundproof privacy booth. EPA's OGC reviewed the relevant materials and on March 23, 2018, sent a response to GAO's letter.<sup>36</sup> In EPA's response, EPA's then Principal Deputy General Counsel opined that "all uses of appropriated funds were consistent with the appropriations act identified" by GSA.<sup>37</sup> EPA's letter further stated that the legal view of the Agency was that it had not violated section 710 of the Financial Services and General Government Appropriations Act, since EPA's obligation of funds for installation of the privacy booth "was an expense necessary to ensure that the Administrator's office was equipped with an item that enables the Administrator to conduct agency business in a private space."<sup>38</sup> The letter concluded that the expenditures on the soundproof booth "did not fall within the purview of section 710" and that EPA's actions "were consistent with all provisions of law GAO identified in its letter."<sup>39</sup>

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<sup>32</sup> Oct. 4, 2018 letter at 2.

<sup>33</sup> See GAO letter, December 21, 2017.

<sup>34</sup> See *id.*

<sup>35</sup> See *id.*

<sup>36</sup> See GAO letter, March 23, 2018.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*



On April 16, 2018, GAO issued its legal opinion concerning the expenditures associated with the soundproof booth and responded to Congress with its views. GAO disagreed with EPA's findings and analysis, as expressed in EPA's March 23, 2018 letter.<sup>40</sup> GAO found that EPA had "violated section 710 of the Financial Services and General Government Appropriations Act, 2017 when it failed to notify the Committees on Appropriations of the House of Representatives and Senate prior to obligating in excess of \$5,000 to install a soundproof privacy booth for the office of the Administrator during his period of appointment."<sup>41</sup> As a result, GAO stated that the EPA should report its Antideficiency Act violation as required by law.<sup>42</sup>

In response to GAO's April 16, 2018 opinion, EPA's CFO sent a letter on April 25, 2018 to Chairmen Murkowski and Calvert, and Ranking Members Udall and McCollum, of the Committee on Appropriations. The letter stated that GAO had issued an opinion concluding that EPA's installation of a soundproof privacy booth falls within section 710 of the Financial Services and General Government Appropriations Act, 2017, but that EPA had not come to the same conclusion. The letter also stated, "the purpose of this letter is to comply with th[e] [GAO] opinion and notify you that EPA, during Fiscal Year 2017, obligated \$43,238.68 from the Environmental Programs and Management appropriation account to install a soundproof privacy booth in the Administrator's office."<sup>43</sup> EPA attached sixty-two (62) pages of documentation related to the purchase of the soundproof privacy booth to its letter to the Committee. This documentation included orders for supplies, a cost breakdown of the booth from a contractor, architectural plans for the booth, and an invoice for the purchase of the booth.<sup>44</sup>

The whistleblowers also alleged that EPA paid for an unnecessary security sweep of former Administrator Pruitt's office. In February 2018, in response to an anonymous complaint, the Professional Integrity and Quality Assurance (PIQA) staff, located in EPA's Office of Criminal Enforcement, Forensics, and Training (OCEFT), began investigating allegations regarding the security sweep and that such sweep had been done at EPA expense without following proper procurement regulations. PIQA was also investigating a claim that the sweep was conducted by an individual with personal ties to then PSD agent.

On February 21, 2018, the OIG notified EPA that OIG would initiate an investigation into allegations that a PSD agent allegedly "steered" a contract to a friend in relation to a sweep of the Administrator's office for listening devices. Therefore, PIQA did not investigate this allegation. In its November 2019 Semiannual Report to Congress, the OIG reported that the Federal Bureau of Investigation (FBI) led a joint investigative effort into the allegations regarding the alleged "steering" of the security sweep contract, with the FBI investigating potential criminal violations and EPA's OIG investigating any potential employee policy violations.<sup>45</sup> On June 19, 2019, the FBI notified the OIG that the U.S. Department of Justice

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<sup>40</sup> "U.S. Environmental Protection Agency—Installation of Soundproof Privacy Booth," U.S. Government Accountability Office, April 16, 2018 (<https://www.gao.gov/assets/700/691272.pdf>).

<sup>41</sup> *Id.* at 8.

<sup>42</sup> *See id.*

<sup>43</sup> Letter from EPA to Appropriations Committee, April 25, 2018.

<sup>44</sup> *See id.*

<sup>45</sup> *See* Office of Inspector General Semi-Annual Report to Congress, April 1, 2019 – September 30, 2019 ([https://www.epa.gov/sites/production/files/2019-11/documents/\\_epaig\\_201911\\_epa-350-r-19-004.pdf](https://www.epa.gov/sites/production/files/2019-11/documents/_epaig_201911_epa-350-r-19-004.pdf)).



declined the case for prosecution. During the course of the administrative investigation, the EPA employee in question retired and, as a result, the OIG closed its administrative investigation.<sup>46</sup>

Finally, per your October 4, 2018 letter, the whistleblowers alleged that former Administrator Pruitt improperly used his official position and agency resources for his personal benefit and the personal benefit of his staff. Specifically, they allege that former Administrator Pruitt abused his authority to secure discounted living space from a lobbyist; that he instructed EPA staff to spend official work hours contacting real estate vendors and touring potential residential properties; and that he tasked EPA staff members with his personal errands during official work hours. The OIG investigated these matters and summarized its investigatory activities in its Semiannual Report to Congress on November 30, 2018.<sup>47</sup> The OIG reported that it conducted an administrative investigation into former EPA Administrator Scott Pruitt's lodging agreement with a lobbyist's wife. Investigators interviewed witnesses and reviewed records pertaining to the lodging agreement, which involved the Administrator renting a room in a townhouse owned by a lobbyist's wife. Mr. Pruitt resigned prior to being interviewed by investigators. For that reason, "the OIG deemed that the result of the investigation was inconclusive" and closed the case.<sup>48</sup> The Semiannual Report also explained that OIG investigated allegations that former EPA Administrator Scott Pruitt had subordinates at the EPA assist him in finding personal housing and conducting other personal tasks. Investigators interviewed witnesses and reviewed records. Mr. Pruitt resigned prior to being interviewed by investigators. Therefore, "the OIG deemed that the result of the investigation was inconclusive" and closed the case.<sup>49</sup>

### **III. Allegations Regarding Certain Personnel Decisions of Former Administrator Pruitt**

Your October 4, 2018 letter contains whistleblower allegations concerning alleged salary increases former Administrator Pruitt provided to two then-EPA employees. The EPA OIG investigated the issue of these salary increases. The salary increases were provided to certain individuals in administratively determined (AD) positions under the Safe Drinking Water Act (SDWA). The OIG conducted its audit from January 2018 to August 2019, to evaluate EPA's use of AD positions and how the Agency filled those positions.<sup>50</sup> The OIG "interviewed staff from the Office of Human Resources, reviewed the provisions of the SDWA, obtained a list of AD positions, and reviewed personnel files."<sup>51</sup> It also "compared how different EPA Administrators used AD positions between January 2009 and August 2018."

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<sup>46</sup> See *id.* at 61.

<sup>47</sup> Office of Inspector General Semiannual Report to Congress, April 1, 2018-September 30, 2018 ([https://www.epa.gov/sites/production/files/2018-11/documents/\\_epaig\\_20181031-epa-350-r-18-003\\_linked.pdf](https://www.epa.gov/sites/production/files/2018-11/documents/_epaig_20181031-epa-350-r-18-003_linked.pdf)).

<sup>48</sup> *Id.* at 12.

<sup>49</sup> *Id.* at 13.

<sup>50</sup> On April 16, 2018, the OIG issued a Management Alert to notify EPA of certain factual information while the OIG's audit was ongoing (Management Alert: Salary Increases for Certain Administratively Determined Positions). Specifically, the Management Alert included factual information regarding six employees who occupied AD positions and addressed who requested and signed the personnel actions related to these employees, as well as the position conversions and salary increases associated with the employees. The OIG found that the Agency used authority under the SDWA to provide significant pay raises for individuals in AD positions.

<sup>51</sup> See *id.* at 3.



OIG issued its final audit report on August 21, 2019, entitled “EPA’s Use of Administratively Determined Positions Is Consistent with Its Authority Under the Safe Drinking Water Act.”<sup>52</sup> The report concluded that “EPA Administrators have used their authority under the SDWA to make a variety of appointments to AD positions, including new hires and existing employees” since January 2009.<sup>53</sup> Furthermore, the OIG identified that “appointments varied in terms of type (professional, legal, scientific and administrative) and location (Administrator’s office, program offices and regional offices).”<sup>54</sup> Although “EPA Administrators used their authority under the SDWA to expedite the hiring of employees intended for political appointments,” the OIG found that “the act does not specify how appointments are to be used and does not require that appointees work on drinking-water related issues.”<sup>55</sup> Therefore, the OIG concluded that “the agency’s use of AD positions is consistent with the authority provided by the statute,” and thus made no recommendations. The OIG further noted that as a result of the audit, EPA later reduced the salaries of two employees who had received increases in salary when converting from Schedule C to the AD position, back to their original salaries.<sup>56</sup>

#### **IV. Allegations Regarding Improper Use of Official Position**

The whistleblowers further alleged that the PSD was using emergency lights and/or sirens at former Administrator Pruitt’s request in non-emergency situations. On February 20, 2018, PIQA received an anonymous complaint alleging misconduct by a senior PSD agent. Specifically, the email alleged that lights and sirens were routinely used when transporting the former Administrator during non-emergency situations. OCEFT management directed PIQA to initiate an investigation into the allegations and to coordinate efforts with the EPA OIG. The OIG reviewed the matter and declined to investigate, referring the matter to PIQA for investigation.

PIQA’s investigation focused on whether the employee in question authorized and/or used lights and sirens in violation of OCEFT’s directives, including OCEFT’s Policy on Government Owned Vehicles and procedures entitled “Requirements for Protective Service Duties.” As part of its investigation, PIQA interviewed fifteen individuals. Through these interviews, PIQA found that that lights and sirens had been used in non-emergency situations. PIQA also found that at the time the interviews were conducted, the employee in question had directed agents to follow OCEFT’s policy on the use of emergency equipment. The employee in question retired from the Agency, and PIQA concluded its investigation in June of 2018. Following the employee’s retirement, no further administrative action was taken, as OCEFT’s policies and procedures prohibit use of lights and sirens in non-emergency situations.

#### **V. Allegations that the EPA OIG violated the IG Act**

Part B of your October 4, 2018 letter contains several allegations concerning possible violations by the EPA OIG of the Inspector General Act, and possibly other laws. On December 20, 2018, [REDACTED], Acting Counsel to the EPA’s Inspector General, referred the allegations

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<sup>52</sup> See *id.*

<sup>53</sup> See *id.* at 6.

<sup>54</sup> See *id.*

<sup>55</sup> See *id.*

<sup>56</sup> See *id.*



to the Integrity Committee (IC) of the CIGIE.<sup>57</sup> On December 21, 2018, [REDACTED], IC Program Director, responded to [REDACTED] and stated that the IC had received EPA's submission and that the IC previously reviewed and closed these allegations as IC case numbers 940, 943 and 957. [REDACTED] further explained that IC had received a copy of OSC's October 4, 2018 letter and that IC had notified OSC of IC's previous determinations. Mr. Dahl sent letters to EPA Inspector General Arthur Elkins, Jr., notifying Mr. Elkins about the closure of case numbers 940 and 943 and case number 957 on July 27, 2018 and on August 15, 2018, respectively.<sup>58</sup> OIG took no further action with regard to the allegations given that IC had reviewed and closed cases concerning those allegations.

## CONCLUSION

Thank you for bringing these important matters to our attention. We appreciate the opportunity to investigate these allegations. As noted above, the OIG conducted an extensive travel audit and concluded that EPA's travel policy is sufficiently designed to prevent fraud, waste, and abuse, and is consistent with the FTR. OIG also conducted various investigations into the other allegations, as did EPA. I believe that the remedial measures undertaken by the Agency in response to the investigations evidence the Agency's strong commitment to ensuring that it has strong policies and procedures in place concerning the matters described above. If you have any further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Michael D. Molina". The signature is fluid and cursive, with the first name "Michael" and last name "Molina" clearly legible.

Michael D. Molina  
Acting Chief of Staff

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<sup>57</sup> See Letter from [REDACTED] to The Honorable Scott Dahl, Chairperson, IC, December 20, 2018.

<sup>58</sup> See IC Closure Letters, July 27, 2018 and August 15, 2018.