



National Federation of Federal Employees



Professionalism in Public Service

Local 2050

September 26, 1991

Dr. Raymond Loehr
Chairman, Panel on Science At EPA
A-101
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Dr. Loehr,

On behalf of the professionals at EPA Headquarters, NFFE Local 2050 would like to offer some additional comments to those already mentioned at the public hearings on improving the role of science at EPA. We would like to stress, however, that no investigation of the role of science at EPA can be undertaken without going directly to those most responsible for it: the EPA scientists. Our comments, therefore, are to be taken as preliminary to what we hope will be a more thorough investigation, through the Union, of the opinions of EPA professionals.

FRAGMENTATION OF SCIENCE

The Agency has grown in response to new legislation by creating separate organizations for each one, each with a science component. Programs are heavily weighted toward regulations, often run by managers with precious little understanding of the needs of scientists. Almost every program deals with the hazards of chemicals to humans and the environment. Some are thinly staffed to assess these hazards, while others rely upon secondary sources that are often out of date. Still others rely upon other offices to provide assessments. Not one program has the capacity to do an adequate job. Fragmenting health and ecological assessment in different programs (and in the Office of Research and Development) means there is seldom a critical mass of professionals to do a first-class job and stay on top of the literature. There are few professionals who can claim expertise in particular chemicals or classes of chemicals, and fewer still who are identified by the Agency as national and/or international experts.

Recommendation #1

a. Evaluate the feasibility of combining common scientific elements in program offices, especially in the areas of chemical risk assessment, testing, and assessing pollution from industrial point sources.

b. Define the overall strategy for conducting the work of these scientific elements.

c. Conduct an honest evaluation of the resources necessary for the Agency to do the job that the public expects us to do.

Attached for your consideration are some thoughts on the principles for chemical assessment prepared by William Coniglio, a biologist with the Office of Drinking Water, a charter member of EPA and first president of our union. It attempts to outline just what the job of assessment really is. We agree with Bill that you need to identify the objectives of Agency science. An honest evaluation of how this compares to current procedures would shine a lot of light on how far we have to go.

RESOLVING ETHICAL ISSUES AND DIFFERENCES OF OPINION

As admitted by EPA, there is no code of ethics, nor policies and procedures to deal with violations of professional ethics, nor mechanisms to identify and resolve differences of opinion. This situation begs for change. The policy of separating risk assessment and risk management has not prevented scientists from being pressured to serve up either superficial analyses, or support documents that are politically acceptable, but scientifically suspect. An enforceable code of professional ethics would go a long way in protecting the rights of the individual professional using the tools of their profession to speak the truth as they see it, whether or not the result of their work is difficult for the politicians to accept.

When honest differences of opinion arise, they are often swept under the rug and left unresolved. Clarification of the issues involved would enhance the scientific basis for decisions, but there is currently no mechanism or encouragement for individuals to raise issues in an open forum of their peers and attempt to resolve them.

Recommendation #2

a. Develop an enforceable code of professional ethics that deals with the rights and the responsibilities of the individual to produce quality work free of political interference.

b. Develop a mechanism for encouraging professionals to raise issues and a forum, run by professionals, for airing differences of opinion, identifying information needs for resolving issues, and resolving differences where possible.

QUALITY OF SCIENTIFIC WORK

Scientific support documents are very often not subject to a serious peer review process as practiced in academia and industry. What we have now for the most part is "political review" and the public is not well served.

Recommendation #3

- a. Subject major scientific assessments to an internal and external peer review process determined by the professionals themselves.
- b. Begin an EPA journal run by the professionals, including a peer review committee selected by the professionals themselves.

PROFESSIONALISM

Professionalism demands that the primary requirement for filling a particular position be the professional qualifications of the individual in the necessary technical field. Instead, scientists applying for positions in EPA program offices are often given priority consideration based on their knowledge of a particular statute. Another hiring problem is the placement of professionals in non-professional positions that have quasi-technical requirements in order to get around OPM hiring requirements.

Recommendation #4

- a. Rating factors should be changed to stress technical qualifications with a minimum requirement for knowledge of law or regulations. Professionals should be used to evaluate candidates.
- b. Every Environmental Protection Specialist position should be audited to determine if they need to be upgraded to professional positions.

Although all professionals need to meet and exchange ideas, and to be aware of what is going on in the real world, the Agency apparently does not recognize this need. The funding for professionals to attend conferences, even when they have prepared papers, is almost non-existent. Funding for training is equally sparse.

Recommendation #5

The Agency needs to examine the requirements in time and money necessary to maintain a professional workforce, and then modify currently existing travel and training budgets, program by program, to make them credible.

MANAGEMENT

It is truly unethical to have supervisors with little or no credentials passing judgment on the quality of professional work, or directing professional programs.

Recommendation #6

EPA should move immediately to investigate the extent to which unqualified supervisors are reviewing or directing the work of professionals, and correct the situation.

The traditional autocratic management style is antithetical to the collegial atmosphere necessary for science to operate effectively. While the new Total Quality Management program is supposed to address this issue, the actual program as it is unfolding reveals it to be the old style with new words. Instead of identifying problems from the bottom up and sharing in the decision making, professionals are being told what problems they are going to work on. This effectively negates input from those who are actually doing the work and whose problems are not being addressed.

Recommendation #7

The Agency should act immediately to negotiate a Total Quality Management Program with NFFE, the professionals' representative at EPA's headquarters, that truly allows for consensus on how science is conducted at EPA.

Thank you for the opportunity to comment.

Sincerely,



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