



OFFICE OF EXTERNAL CIVIL RIGHTS COMPLIANCE

WASHINGTON, D.C. 20460

December 13, 2024

Kimberley McKee
Administrative Services Director IV
Vermont Department of Environmental Conservation
via email: Kimberley.McKee@vermont.gov

**Re: Post-Award Audit of Form 4700-4 Submission for EPA Grant #4L 99121L23
(Vermont Department of Environmental Conservation)**

Dear Ms. McKee:

Thank you for submitting responses to the US Environmental Protection Agency's (EPA) Request for Information (RFI): Post-Award Audit of Form 4700-4 Submission for EPA Grant #4L 99121L23. EPA's Office of External Civil Rights Compliance (OECRC) initiated the audit on August 1, 2024, to confirm whether Vermont Department of Environmental Conservation's (VTDEC) Form 4700-4 relating to EPA Grant #4L 99121L23 fulfills the nondiscrimination regulation requirements as indicated on that specified Form, which was reviewed by EPA at the time of application for EPA financial assistance. OECRC has reviewed VTDEC's responses to the RFI, including the corresponding links and documents VTDEC provided on October 18, 2024, and determined that the responses generally fulfill the requirements for the questions on Form 4700-4. Accordingly, there is no further action required by VTDEC at this time.

During the course of the audit, OECRC reviewed VTDEC's Audit RFI responses and the [Department of Environmental Conservation](#) website, which stated that VTDEC is overseen by the Vermont Agency of Natural Resources (VTANR), and follows the same nondiscrimination policies and practices of that Agency. Accordingly, OECRC reviewed [VTANR's](#) website, VTANR's [Language Access Plan](#), VTANR's [Civil Rights Nondiscrimination Grievance Procedure](#), VTANR's Draft Reasonable Accommodations Guidance, VTANR's Draft Language Access Plan Implementation Procedure, and VTANR's Nondiscrimination Notice Poster. OECRC also reviewed VTDEC's EPA Form 4700-4 Data Question Memorandum.

Based on our review, OECRC recommends scheduling a technical assistance call where our staff can provide additional guidance on VTDEC's ongoing obligations under federal nondiscrimination laws with respect to its programs and activities. You may also view EPA's [Civil](#)

[Rights Guidance on Procedural Safeguards: Requirements and Best Practices](#) document for more information and technical assistance materials.

This letter marks the conclusion of EPA's post-award audit of VTDEC's Form 4700-4 Submission for EPA Grant #4L 99121L23. The conclusion of the audit does not affect VTDEC's continuing responsibility to comply with 40 C.F.R. Parts 5 and 7 and does not affect or address any other matter not covered by the audit. This letter is not a formal statement of EPA policy and should not be relied upon, cited, or construed as such.

Sincerely,



Anhthu Hoang, Acting Director
Office of External Civil Rights Compliance
Office of Environmental Justice and External Civil Rights