



At a Glance

Why We Did This Audit

The U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), conducted this audit in response to a congressional request. A congressional committee requested that the OIG audit the activities and expenditures under a \$15.7 million cooperative agreement awarded to the Northwest Indian Fisheries Commission (NWIFC). According to the audit request, the EPA appears to have improperly funded the *What's Upstream?* advocacy campaign in Washington state. The campaign included advertising and an interactive website urging the public to contact state lawmakers.

This report responds to five questions from the congressional committee's audit request about the EPA, NWIFC and oversight of the sub-award to the Swinomish Indian Tribe.

This report addresses the following EPA goal or cross-agency strategy:

- *Protecting America's waters.*

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EPA-Funded What's Upstream? Advocacy Campaign Did Not Violate Lobbying Prohibitions

What We Found

The EPA properly funded the *What's Upstream?* advocacy campaign and did not violate lobbying-related prohibitions. In response to the congressional committee's five concerns, we made the following determinations:

1. The EPA followed applicable laws, regulations and policies in awarding the cooperative agreement.
2. The EPA followed applicable laws, regulations and policies in performing required oversight of the cooperative agreement.
3. NWIFC followed applicable laws, regulations and policies in performing and implementing the cooperative agreement.
4. All costs claimed by NWIFC for the *What's Upstream?* advocacy campaign were allowable. A separate audit addresses whether the remaining costs under the cooperative agreement are allowable.
5. The EPA had communication with NWIFC as part of its oversight functions, including some communication with Strategies 360, a Swinomish Indian Tribe consultant, regarding the *What's Upstream?* advocacy campaign.

The EPA and NWIFC complied with applicable laws, regulations and policies. The EPA's oversight of the cooperative agreement and sub-award included communication.

We made no recommendations regarding the committee's concerns.