



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

OFFICE OF
INSPECTOR GENERAL

September 18, 2018

MEMORANDUM

SUBJECT: Project Notification:
Evaluation of the Effectiveness of EPA's Tribal Pesticide
Enforcement Cooperative Agreements
Project No. OA&E-FY18-0285

FROM: Jeffrey Harris, Director
Toxics, Chemical Management and Pollution Prevention Directorate
Office of Audit and Evaluation

TO: Susan Bodine, Assistant Administrator
Office of Enforcement and Compliance Assurance

Charlotte Bertrand, Acting Principal Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin preliminary research on the EPA's management of tribal pesticide enforcement cooperative agreements. This project is based on the OIG's internal planning process.

The OIG's objective is to determine whether the EPA's negotiations, review and approval of tribal pesticide enforcement work plans—which are required as part of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) enforcement cooperative agreements—support the achievement of agency goals and requirements. The OIG plans to conduct work at EPA headquarters, regional offices and other appropriate sites. Applicable generally accepted government auditing standards will be used in conducting our project. The anticipated benefits of this project are reduced pesticide risks to human health and the environment in Indian Country through improved management of tribal pesticide enforcement cooperative agreements.

We will contact you to arrange a mutually agreeable time to discuss our objective and the purpose of the preliminary research phase of our project. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the project process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the course of the project. Throughout the project, we will provide updates on a regular basis as agreed upon at this meeting.

To expedite our review, we request that you please provide the following information to Jee Kim, Project Manager, at kim.jee@epa.gov, prior to the kickoff meeting:

- Agency policies and procedures regarding the EPA's management of tribal pesticide enforcement cooperative agreements.
- List of tribes that currently have pesticide enforcement cooperative agreements.
- Copies of all tribal pesticide enforcement cooperative agreements, including work plans, from fiscal year 2015 through fiscal year 2018.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. We will request that you resolve the situation if an agency employee or contractor refuses to provide requested records to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the Administrator and include the incident in the *Semiannual Report to Congress*.

I will supervise the project and, as mentioned earlier in this memorandum, the Project Manager will be Jee Kim. Any information related to the project should be addressed to me at (202) 566-0831 or harris.jeffrey@epa.gov or to Jee Kim at (913) 551-7009 or kim.jee@epa.gov.

cc: Henry Darwin, Acting Deputy Administrator
 Ryan Jackson, Chief of Staff
 Michael Molina, Special Advisor, Office of the Administrator
 Lawrence Starfield, Principal Deputy Assistant Administrator for Enforcement and Compliance Assurance
 Patrick Traylor, Deputy Assistant Administrator for Enforcement and Compliance Assurance
 Nancy Beck, Deputy Assistant Administrator for Chemical Safety and Pollution Prevention
 Louise Wise, Deputy Assistant Administrator for Chemical Safety and Pollution Prevention
 Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and Compliance Assurance
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