

The EPA Adhered to Tribal Consultation Policies for Pesticide Actions but Could Update Guidance to Enhance the Meaningful Involvement of Tribal Governments

September 29, 2023 | Report No. 23-E-0037

EPA uses a 4-phase consultation process with tribal nations:



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Abbreviations

CPA	Certification of Pesticide Applicators
EPA	U.S. Environmental Protection Agency
OCSPP	Office of Chemical Safety and Pollution Prevention
OIG	Office of Inspector General
OITA	Office of International and Tribal Affairs
RUP	Restricted-Use Pesticide

Key Definitions

Restricted-use pesticides	Pesticides that have the potential to cause unreasonable adverse effects to public health and the environment without added restrictions on use.
Tribal consultation	Formal meeting between the EPA and tribal governments on all EPA actions and decisions that may affect tribal interests.

Cover Image

The EPA's four-phase tribal consultation process: identify potential activities, notify, receive input, and follow up. (EPA image)

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At a Glance

The EPA Adhered to Tribal Consultation Policies for Pesticide Actions but Could Update Guidance to Enhance the Meaningful Involvement of Tribal Governments

Why We Did This Evaluation

To accomplish this objective:

The U.S. Environmental Protection Agency Office of Inspector General conducted this evaluation to determine whether the EPA adhered to its tribal consultation policies during the development of:

- The 2014 *EPA Plan for the Federal Certification of Applicators of Restricted Use Pesticides within Indian Country*.
- The 2017 Certification of Pesticide Applicators rule revision.
- The 2020 proposed revisions to the 2014 *EPA Plan for the Federal Certification of Applicators of Restricted Use Pesticides within Indian Country*.

To support this EPA mission-related effort:

- *Partnering with states and other stakeholders.*

To address this top EPA [management challenge](#):

- *Providing for safe use of chemicals.*

Address inquiries to our public affairs office at (202) 566-2391 or OIG.PublicAffairs@epa.gov.

[List of OIG reports.](#)

What We Found

The EPA has several policies that guide the Agency's communication and coordination with tribal governments. The Office of International and Tribal Affairs and the Office of Chemical Safety and Pollution Prevention adhered to these policies during the development of three actions related to restricted-use pesticides: the 2014 *EPA Plan for the Federal Certification of Applicators of Restricted Use Pesticides within Indian Country*, the 2017 Certification of Pesticide Applicators rule revision, and the 2020 proposed revisions to the aforementioned 2014 EPA plan. However, we identified opportunities for the EPA to enhance the meaningful involvement of tribal governments in decision-making processes that affect Indian Country.

Specifically, while the 2011 *EPA Policy on Consultation and Coordination with Indian Tribes* states that the EPA should hold meaningful consultations prior to the EPA taking actions or implementing decisions that may impact tribes, meaningful is not clearly defined or described in the 2011 policy. Additionally, the EPA did not always allow tribes sufficient time to prepare for consultations, and in one instance, there was a significant time lapse between the initial tribal consultation and the Agency action. The EPA can contribute to meaningful interactions with tribes by ensuring timely notification to tribes to prepare for consultations and by having additional consultation opportunities when there is a significant time lapse between the initial consultation and the Agency action.

According to the EPA, the Agency is currently updating its 2011 tribal consultation policy. Because the Office of International and Tribal Affairs and the Office of Chemical Safety and Pollution Prevention adhered to tribal consultation policies in connection with the three restricted-use pesticide actions we reviewed, we do not make recommendations in this report. Instead, we offer suggestions for the EPA to consider as it updates its 2011 tribal consultation policy and subsequent guidance documents to assist program and regional offices with implementing the policy.

Meaningful involvement during tribal consultations may help improve government-to-government relationships by ensuring that the EPA considers tribal interests prior to taking actions or implementing decisions that may affect tribes.



OFFICE OF INSPECTOR GENERAL
U.S. ENVIRONMENTAL PROTECTION AGENCY

September 29, 2023

MEMORANDUM

SUBJECT: The EPA Adhered to Tribal Consultation Policies for Pesticide Actions but Could Update Guidance to Enhance the Meaningful Involvement of Tribal Governments
Report No. 23-E-0037

FROM: Sean W. O'Donnell, Inspector General 

TO: Michal Ilana Freedhoff, Assistant Administrator
Office of Chemical Safety and Pollution Prevention

Jane Nishida, Assistant Administrator
Office of International and Tribal Affairs

This is our report on the subject evaluation conducted by the U.S. Environmental Protection Agency Office of Inspector General. The project number for this evaluation was [OSRE-FY23-0038](#). This report contains findings that describe the problems the OIG has identified and suggests improvements for the subjects of the evaluation. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

You are not required to respond to this report because this report contains no recommendations. If you submit a response, however, it will be posted on the OIG's website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epaoig.gov.

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Purpose

The U.S. Environmental Protection Agency Office of Inspector General [initiated](#) this evaluation to determine whether the EPA adhered to its tribal consultation policies during the development of:

- The *EPA Plan for the Federal Certification of Applicators of Restricted Use Pesticides within Indian Country*, known as the *2014 EPA Plan*.
- The 2017 Certification of Pesticide Applicators rule revision issued at 40 C.F.R. part 171 and referred to in this report as the 2017 CPA rule.
- The 2020 proposed revisions to the *2014 EPA Plan*.

Top management challenge addressed

This evaluation addresses the following top management challenge for the Agency, as identified in the OIG's *U.S. Environmental Protection Agency Fiscal Year 2023 Top Management Challenges [report](#)*, issued October 28, 2022:

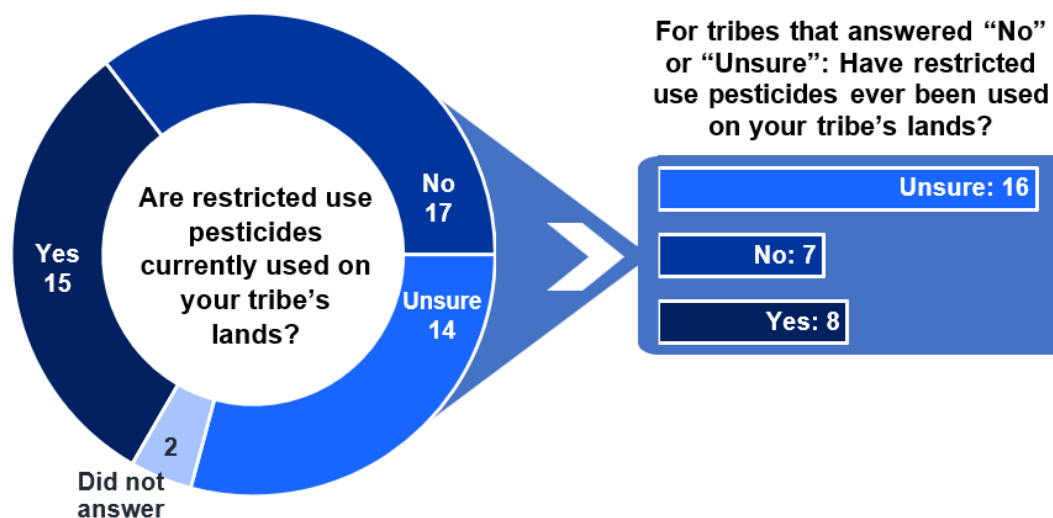
- Providing for safe use of chemicals.

Background

Restricted-use pesticides, or RUPs, are a classification of pesticides that are only available for purchase or use by the public with added restrictions because of their potential to cause unreasonable adverse effects to applicators, workers, the public, or the environment. The restricted use classification means that only a certified applicator or someone under the certified applicator's direct supervision can apply RUPs. The EPA's CPA rule, first issued in 1974, sets competency standards for RUP applicators and a framework for certifying authorities, such as tribal or state agencies, to administer pesticide applicator certification programs.

In response to a survey that we issued to tribes in January 2023, 23 of 48 respondents indicated that RUPs are being used or had been used on their land, as shown in Figure 1. The Federal Insecticide, Fungicide, and Rodenticide Act requires that state, tribal, or federal agencies have an EPA-approved certification plan to certify RUP applicators. These plans outline certification and training requirements for applicators. An individual becomes a certified RUP applicator by meeting the requirements of an EPA-approved certification plan that is administered by a state or tribe, the EPA, or another federal agency.

Figure 1: OIG survey questions and tribe responses



Source: Summary of OIG survey responses. (EPA OIG image)

Under regulations issued by the EPA for implementation of the Federal Insecticide, Fungicide, and Rodenticide Act, tribes can submit their own tribal certification plan to the EPA for approval. Tribes that are not covered by an EPA-approved certification plan are covered by the *2014 EPA Plan*, which is an EPA-administered certification plan.

In 2017, the EPA revised the CPA rule to update certification standards for pesticide applicators. The 2017 CPA rule established stronger protective standards to help ensure safe RUP use and reduce the likelihood of RUP misapplication. The 2017 CPA rule required states and tribes to update their certification plans to reflect the changes. States, tribes, and other certifying authorities were required to submit proposed certification plan modifications to the EPA by March 2020. All existing certification plans will expire unless the EPA approves the revised plans by November 2023. If tribes choose not to update their existing plans, however, they will be automatically covered by the *2014 EPA Plan* unless they opt out of the plan. The EPA is revising the *2014 EPA Plan* pursuant to the 2017 CPA rule. The EPA proposed revisions to the *2014 EPA Plan* in 2020. As of June 2023, the revised plan had not yet been finalized.

Tribal Consultations

The EPA notes that its *EPA Policy for the Administration of Environmental Programs on Indian Reservations*, or the *1984 Indian Policy*, was one of the first formal policies by a federal agency to specify how a federal agency would interact with tribal governments. The *1984 Indian Policy* identified principles to provide for the involvement of tribal governments in making decisions and managing environmental programs. On November 6, 2000, Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*, was issued. This executive order requires federal agencies to have a process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications.

In 2011, the EPA issued the *EPA Policy on Consultation and Coordination with Indian Tribes*, referred to in this report as the 2011 tribal consultation policy, to fully implement both Executive Order 13175 and the *1984 Indian Policy*. The policy established national guidelines for the Agency’s consultations with tribal governments. The policy describes consultation as a “process of meaningful communication and coordination between EPA and tribal officials prior to EPA taking actions or implementing decisions that may affect tribes.” It identifies four phases: (1) identification of Agency actions that may be appropriate for consultation, (2) notification to tribes of upcoming consultation opportunities, (3) tribal input on proposed Agency actions, and (4) follow-up by the Agency with tribal governments to address the EPA’s consideration of any tribal input. In 2014, the EPA issued the *EPA Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples*, which reaffirmed the EPA’s commitment to meaningfully involve tribes in EPA decisions that may impact their health or environment. Also, some EPA program offices issued their own standard operating procedures and guidelines, or in the case of the Office of Chemical Safety and Pollution Prevention, or OCSPP, used other program office guidelines, for interpreting the 2011 tribal consultation policy.

Two recent presidential memorandums affirmed the importance of tribal consultation. The January 2021 *Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships* directed federal agencies to submit a detailed plan outlining how the agency will implement Executive Order 13175. The November 2022 *Memorandum on Uniform Standards for Tribal Consultation* established uniform minimum consultation standards for all agencies. As of August 2023, the EPA was updating its 2011 tribal consultation policy to improve the Agency’s tribal consultations and was planning to develop national implementation guidance.

Responsible Offices

The EPA Office of International and Tribal Affairs, or OITA, is responsible for supporting tribes in administering their own programs and strengthening public health and environmental protection in Indian Country. OITA’s American Indian Environmental Office leads the EPA’s efforts to protect human health and the environment of federally recognized tribes by supporting the tribes’ implementation of federal environmental laws. OITA coordinates and oversees the national implementation of the *EPA Policy on Consultation and Coordination with Indian Tribes*. Additionally, tribal consultations occur within each EPA region and program office, including within the OCSPP, when an action impacts Indian Country. The OCSPP’s mission is, in part, to protect against risk from pesticides, including RUPs. The OCSPP conducted the relevant tribal consultations for the RUP actions we reviewed: the *2014 EPA Plan*, the 2017 CPA rule revision, and the 2020 proposed revisions to the *2014 EPA Plan*.

The EPA’s annual appropriated budget for fiscal year 2023 was \$10,135,433,000. OITA’s fiscal year 2023 budget was \$105,512,000 or 1.041 percent of the EPA’s total budget. The OCSPP’s fiscal year 2023 budget was \$287,373,000, or 2.835 percent of the EPA’s total budget.¹ Tribal consultations are not

¹ The annual budget amounts exclude supplemental appropriations pursuant to the Infrastructure Investment and Jobs Act and the Inflation Reduction Act.

conducted as a specific program and therefore do not have an allocated budget. Instead, resources are directed as needed.

Scope and Methodology

We conducted this evaluation from December 2022 to July 2023 in accordance with the *Quality Standards for Inspection and Evaluation* published in December 2020 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we plan and perform the evaluation to obtain sufficient and appropriate evidence to support findings.

We reviewed documentation and evaluated the EPA's RUP consultations based on their adherence to the EPA consultation policy criteria outlined within various documents. Specifically, we reviewed the *1984 Indian Policy*, the EPA's 2011 tribal consultation policy, and other documents guiding the EPA's tribal consultation processes. We interviewed tribal members from seven tribes; a tribal pesticide group; OITA staff; an OCSPP staff member; EPA regional staff in Regions 8, 9, and 10; and members of an EPA workgroup to determine adherence to and understand tribal consultation policy processes and procedures.

We also conducted a survey to assess possible challenges and gain insight from tribes on their consultation experiences with the EPA. This survey was limited to tribal groups that were either accurately on the EPA's listservs or had heard about the survey from an external stakeholder. Specifically, we distributed the survey using EPA listservs that included 691 individual email addresses targeting tribal environmental directors. In addition, we conducted outreach via an external stakeholder group to extend the survey to some tribes that may not have been on the listservs. We received 28 notifications that our emails were not deliverable and received 48 survey responses.

We provided the OCSPP and OITA an opportunity to review a draft of this report. Both offices responded with technical comments, which we considered and incorporated as appropriate.

Prior Reports

We issued one prior report relevant to this evaluation. OIG Report No. [21-P-0122](#), *Improved Review Processes Could Advance EPA Regions 3 and 5 Oversight of State-Issued National Pollutant Discharge Elimination System Permits*, issued April 21, 2021, found, in part, that the EPA did not meet the intent of its tribal and environmental justice policies to ensure consultation, fair treatment, and meaningful involvement of tribes in EPA decisions affecting their health or environment, specifically related to point source water pollution. All recommendations from this prior report are resolved.

Results

The EPA's OCSPP adhered to applicable tribal consultation policies during the development of the *2014 EPA Plan*, the 2017 CPA rule, and the 2020 proposed revisions to the *2014 EPA Plan*. However, we identified opportunities for the EPA to enhance the meaningful involvement of tribal governments in decision-making processes that affect Indian Country. Specifically, we noted that while the EPA's 2011

tribal consultation policy states that the EPA should hold “meaningful consultations,” the term “meaningful” is not clearly defined or described in the 2011 tribal consultation policy. Additionally, we observed several areas that might enhance the EPA’s interactions with tribes, including timely notification of and opportunity for consultations and better communication with tribes. In the following sections, we provide further details and offer suggestions that the EPA should consider as it updates its 2011 tribal consultation policy and related guidance documents to assist program and regional offices with implementing the policy.

The EPA Adhered to the Tribal Consultation Policy for RUP Actions

The OCSPP held consultations with tribes in 2010 ahead of both the *2014 EPA Plan* and 2017 CPA rule and adhered to the *1984 EPA Indian Policy* in effect at the time. For the OCSPP’s 2020 consultations on the revisions to the *2014 EPA Plan*, the OCSPP adhered to the EPA’s 2011 tribal consultation policy. In comparing all three actions to the 2011 tribal consultation policy, the OCSPP complied with the four phases of consultation for all three actions:

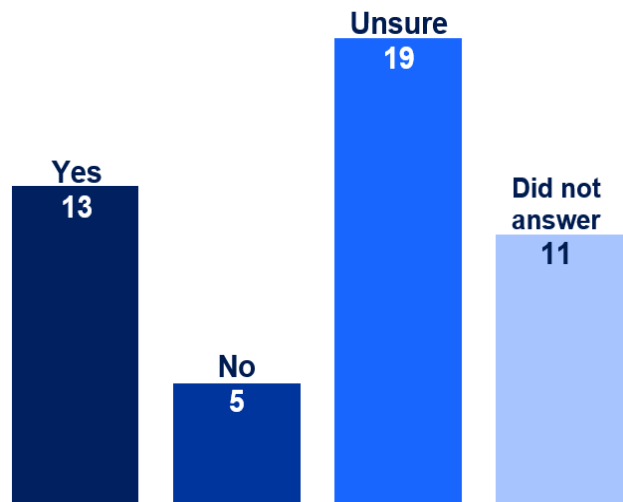
- Identification: EPA staff identified these three RUP actions as relevant to Indian Country.
- Notification: The Agency notified federally recognized tribes ahead of the planned consultations.
- Input: The Agency held consultations via conference call for the 2017 CPA rule, the *2014 EPA Plan*, and the 2020 proposed revisions to the *2014 EPA Plan* in April 2010; November and December 2010; and February, April, and July 2020, respectively. The EPA received input from tribes, including questions and comments, during and after each of these calls.
- Follow-up: The Agency followed up on input received and provided formal, written responses to tribal comments on proposed RUP actions. The EPA’s responses outlined changes made because of input received during tribal consultation.

Describing What Meaningful Consultation Means May Help Improve Government-to-Government Relationships

Despite the term’s importance to the consultation process, the EPA does not describe the term “meaningful” in its 2011 tribal consultation policy. Though some internal EPA guidance documents describe what is meant by meaningful, there is no agencywide description that would ensure that all programs and regions interpret the term the same way. The Agency also does not document an agencywide process for how programs and regions can ensure that consultations are meaningful to tribes. Without a shared understanding of what makes consultations meaningful, the EPA and tribes may perceive consultations differently. For example, the OCSPP’s 2010 and 2020 RUP consultations consisted of conference calls and a presentation given via conference call in 2020. However, as depicted in Figure 2, five of the 48 tribes that responded to our survey said they did not believe conference calls were an effective way to consult with tribes. Further, of the 19 tribes that said they were unsure whether calls were an effective form of consultation, six provided additional comments that were critical of conference

calls. The tribes described limited opportunities for discussion, too many people for concerns to be heard, and technical difficulties.

Figure 2: OIG survey question and tribe responses: *Did tribes believe that conference calls were an effective form of consultation on RUPs?*



Source: Summary of OIG survey responses. (EPA OIG image)

We noted additional negative feedback pertaining to conference calls. One tribe and one tribal stakeholder group said in public comments about the *2014 EPA Plan* that tribes may avoid calls altogether. Additionally, two other tribes submitted letters to the EPA in August 2010 that stated conference calls “are merely scoping and education, not consultation.” While the EPA may believe that consultations conducted via conference calls constituted meaningful consultation, some tribes believe that the EPA’s efforts were not sufficient.

According to the EPA, it started using new tools, such as videoconferencing, to communicate and engage with tribes during the coronavirus pandemic. For example, the Agency held the 2020 consultations via a videoconferencing platform and shared a presentation with participants. However, according to our interviews and survey data, tribes prefer forums with two-way communication, rather than a one-way transfer of information in which the EPA presents information, but tribes have limited opportunities to engage with and provide feedback to the EPA. Tribes mentioned in interviews and public comments that, for consultations to be meaningful, the Agency needs to consider tribal policies and procedures and that consultations should not be one-size-fits-all. One tribe suggested that the OCSPP request consultation preferences directly from tribes.

Furthermore, according to OITA and OCSPP staff, the EPA does not have procedures for ensuring that it holds consultations with authorized officials from tribal governments. Executive Order 13175 states, “Each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications.” The executive order defines tribal officials as “elected or duly appointed officials of Indian tribal governments or authorized intertribal organizations.” However, two individuals who participated in the 2020 consultations told us

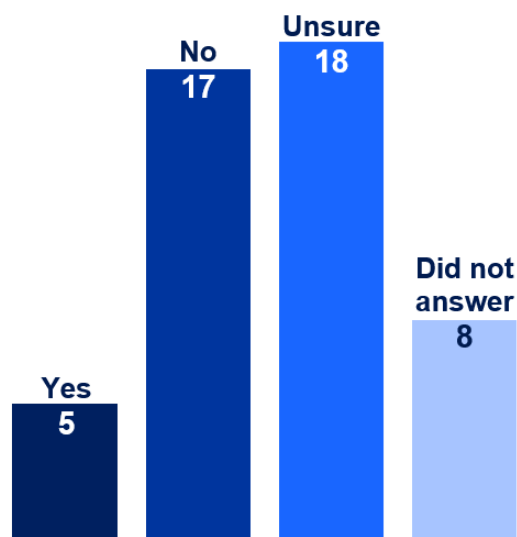
that they did not have the authority to represent their tribes at official consultations. One of those individuals told us that they only consider it a consultation when the EPA meets with the tribe's leadership and, in this case, leadership was not present. That individual further explained that a consultation can only be meaningful if the EPA is aware of the tribe's consultation protocols.

Clearly describing what constitutes a meaningful consultation in the updated EPA tribal consultation policy and any subsequent guidance may help the Agency improve its engagement with tribes and may lead to better outcomes for the tribes and the EPA. In the EPA's policies and guidance documents, the Agency could encourage engagement with the tribes and establish procedures to help ensure that each consultation is meaningful for attendees. The Agency could leverage well-established relationships between the regions and tribes to facilitate this engagement. These additions may help set clearer consultation standards and processes for program and regional offices.

Affording Tribes Additional Time to Prepare for and Participate in Consultations May Increase Tribal Participation

The timing of the EPA's notification to tribes of upcoming consultations does not always allow tribes time to prepare for the consultation. As shown in Figure 3, five tribes that responded to our survey stated they had provided input on the relevant RUP actions. The EPA notified tribes of upcoming consultations 35, 27, and 16 days prior to the first official consultation session for the three RUP actions that we reviewed. The EPA's 2011 tribal consultation policy states that "notification should occur sufficiently early in the process to allow for meaningful input by tribe(s)." While the policy does not set a specific time frame or define what is meant by sufficiently early, the internal guidance document used by the OCSPP states that the office should "provide tribal officials a minimum of 21-30 days' notice prior to holding the first consultation activity." One EPA tribal program manager, who is also a member of the EPA's workgroup updating the Agency's 2011 tribal consultation policy, informed us that the Office of Enforcement and Compliance Assurance strives for 60 days between notification and consultation.

Figure 3: OIG survey question and tribe responses: *Did your tribe provide formal or informal input on any of the restricted use pesticide actions?*



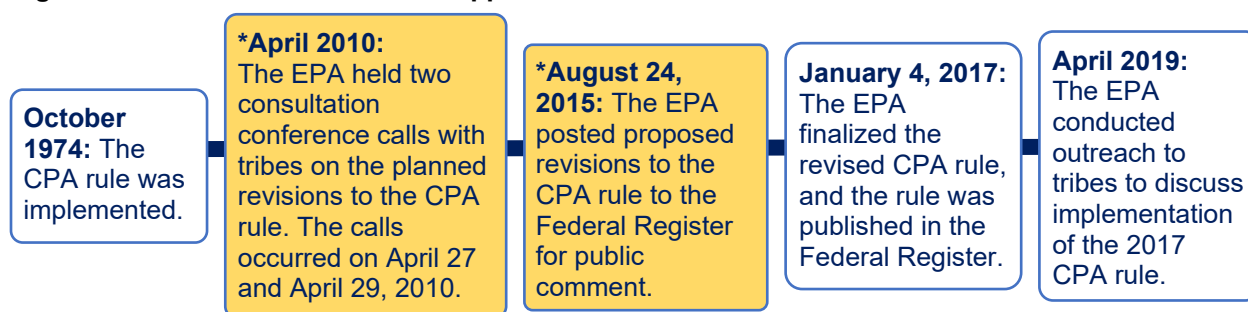
Source: Summary of OIG survey responses. (EPA OIG image)

Two tribes noted the challenges with short notice prior to consultations. One tribe stated in an official comment on the *2014 EPA Plan* that the amount of time the tribe was given to prepare for the consultation was inadequate given the internal processes that the tribe must complete before participating in an official consultation. Another tribe expressed frustration that the EPA expects tribes to accommodate the Agency’s timeline for consultations rather than the other way around. To provide reasonable assurance that tribes have time to prepare for and respond to consultation opportunities, the EPA could collaborate with tribal partners to consistently define “sufficiently early” and could incorporate goals for notification time into its implementation guidance for the EPA tribal consultation policy.

Additional Opportunities for Consultation When There Is a Significant Lapse of Time Between Consultation and Action May Better Reflect Current Tribal Interests

The significant lapse of time between the consultations for the 2017 revisions to the CPA rule and the issuance of the proposed rule may have resulted in a proposed rule that did not reflect the current views of tribes, whose leadership may have changed during that time. As shown in the Figure 4 timeline, the CPA rule was established in 1974 to set standards for RUP applicators. In 2010, the EPA conducted consultations on planned revisions to the CPA rule. However, the Agency did not publish the proposed revisions until 2015 and did not finalize the rule until 2017. The EPA did not conduct additional consultations between the 2010 consultations and when it posted the proposed rule revisions in 2015. In a public comment on the proposed rule, a tribal stakeholder group encouraged the EPA to conduct further consultations before the proposed rule was finalized. The EPA responded that the 2010 consultations were sufficient because, among other reasons, the information shared with tribes at that time closely corresponded with the 2015 proposed rule revisions.

Figure 4: Certification of Pesticide Applicators rule timeline



Note: the yellow boxes, also marked with *, highlight the five-year gap between the consultations and the issuance of the proposed rule.

Source: EPA OIG analysis. (EPA OIG image)

While the *1984 Indian Policy* in effect during the 2010 consultations had no requirement that the EPA conduct additional consultations when there was a significant time lapse between the consultation and the Agency action, more recent internal guidance from the Office of Water and the Office of Air and Radiation note that additional consultations may be necessary for some Agency actions. For example, the Office of Water guidance states that “[f]or significant national actions, such as rulemakings: if a considerable amount of time has elapsed between early consultation and the drafted proposed rule (e.g., over one year) ... [t]he program lead should continue the consultation process with tribes to seek input on the current proposal.” (Emphasis in original.)

As shown in Figure 4, there was a five-year gap between the consultations for the CPA rule and the issuance of the proposed rule. In a meeting with an Agency workgroup, an EPA tribal program manager identified “providing adequate opportunities and time” for tribes to give input on Agency actions as a challenge. Further, one staff member each from EPA Regions 8 and 9 described leadership turnover in tribal governments as an issue that hinders engagement. During our interviews, members from two tribes stated that their tribal leadership changes every few years. A significant lapse of time between consultation and a proposed rulemaking may result in a proposed rule that does not reflect the views and perspectives of the current tribal council. If the EPA conducts additional consultations that occur closer to the date of the proposed action and the date that the Agency takes action, the EPA’s actions may more closely align with current tribal leader’s perspectives.

Conclusions

While the EPA adhered to applicable tribal consultation policies when it conducted consultations for the three RUP actions that we reviewed, the EPA could update guidance to enhance the meaningful involvement of tribal governments in decision-making processes that affect Indian Country. As the Agency reviews its tribal consultation policy, we encourage the EPA to consider and describe what constitutes meaningful consultations, ensure adequate time between notification and consultation, and conduct additional consultations when there is a significant time lapse between consultation and EPA actions. These enhancements may help strengthen government-to-government relationships by ensuring that the EPA conducts consultations in a meaningful and timely manner.

Distribution

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