MEMORANDUM

SUBJECT: Project Notification:
Impact of EPA’s Lack of Notice of Availability of Required
Training Materials on Agricultural Worker Protection Standard Implementation
Project No. OA&E-FY18-0190

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

TO: 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 to evaluate the impact of EPA’s lack of notice of availability of required training materials on Agricultural Worker Protection Standard implementation. Our objective for this project is to determine how the lack of a notice of availability for required Agricultural Worker Protection Standard training materials affects implementation of and compliance with the revised rule.

The OIG plans to conduct work at EPA headquarters and at any other appropriate sites. Applicable generally accepted government auditing standards will be used in conducting our project. The anticipated benefit of this project is to reduce the risk of the delay or untimely implementation of the Work Protection Standard which protects more than 2 million agricultural workers and pesticide handlers who work on 600,000 agricultural establishments.

We will contact you to arrange a mutually agreeable time to discuss our objectives 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.

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.
The project will be supervised by me and the Project Manager will be Lauretta Joseph. Any information related to the project should be addressed to me at (202) 566-0831 or harris.jeffrey@epa.gov, or Lauretta Joseph at (212) 637-3049 or joseph.lauretta@epa.gov.

cc: Ryan Jackson, Chief of Staff
    Henry Darwin, Chief of Operations
    Kevin Chmielewski, Deputy Chief of Operations
    Nancy Beck, Deputy Assistant Administrator for Chemical Safety and Pollution Prevention
    Louise Wise, Deputy Assistant Administrator for Chemical Safety and Pollution Prevention
    Rick Keigwin, Director, Office of Pesticide Programs, Office of Chemical Safety and Pollution Prevention
    Liz Bowman, Associate Administrator for Public Affairs
    Bobbie Trent, Agency Follow-Up Coordinator
    Janet Weiner, Audit Follow-Up Coordinator, Office of Chemical Safety and Pollution Prevention
    Regional Audit Follow-Up Coordinators, Regions 1–10
    Arthur A. Elkins Jr., Inspector General
    Charles Sheehan, Deputy Inspector General
    Alan Larsen, Counsel to the Inspector General
    Kevin Christensen, Assistant Inspector General for Audit and Evaluation
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