

# ORIA Tribal Strategy and Plan

## Strategy Development, Priorities and Recommended Activities

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### **I. ORIA Strategy and Plan Background**

#### **i. Purpose and Goals**

EPA's Office of Radiation and Indoor Air (ORIA) Tribal Strategy and Plan is designed to be implemented in order to ensure that tribes are given full consideration by ORIA programs. The process used to develop and implement the Strategy and Plan is modeled after EPA's Office of Air Quality Planning and Standards' (OAQPS') approach to developing a Tribal Program Plan. OAQPS has successfully used its Tribal Program Plan to improve communication and engagement with tribes and integrate tribal input into program planning.<sup>1</sup>

ORIA's Tribal Strategy Goals are to:

- Optimize ORIA's radiation and indoor air programs' limited resources more efficiently and effectively.
- Increase collaboration across EPA's Regional Offices and Headquarters on its tribal radiation and indoor air work.
- Increase responsiveness to tribes by identifying tribal needs that intersect with ORIA's radiation and indoor air mission and goals.

The purposes of EPA's ORIA Tribal Strategy are to:

- Engage tribes in a discussion of the priority environmental and public health risks that ORIA addresses.
- Provide rationale for engaging with tribal communities on these issues.
- Review the strengths and weaknesses of current EPA and tribal approaches to these issues.
- Explore relevant, ongoing collaborations between EPA and tribes.
- Propose specific activities and approaches for addressing radiation and indoor air pollution in tribes.

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<sup>1</sup> Refer to the OAQPS Tribal Program Plan for 2008 – 2013, available at <http://www.epa.gov/oar/tribal/pdfs/OAQPS Tribal Program Plan May 2008.pdf>.

## ii. Relationship to EPA and ORIA Strategic Goals

The development and implementation of ORIA's Tribal Strategy and Plan are aligned with EPA and ORIA's missions and strategic goals.

- EPA's strategic goals, as outlined in the FY 2011-2015 Strategic Plan,<sup>2</sup> include:
  - Goal 1: Taking action on climate change and improving air quality.
  - Goal 3: Cleaning up communities and advancing sustainable development.
- EPA's FY 2011-2015 Strategic Plan also includes cross-cutting fundamental strategies that set clear expectations for changing the approaches that EPA takes to achieving results. Two of the strategies are directly applicable to the ORIA Tribal Strategy and Plan:
  - Working for environmental justice and children's health.
  - Strengthening state, tribal and international partnerships.
- ORIA's mission is to protect public health from the risks of radiation and indoor air pollution. ORIA executes its mission by coordinating across EPA programs and with other federal, state, tribal and non-governmental organizations.
- ORIA develops criteria, standards, guidance, policies and programs to limit unnecessary radiation exposure and control exposure to indoor air pollutants.
- ORIA also directs an environmental radiation monitoring program, responds to radiological emergencies, and evaluates and assesses the overall risks and impacts of radiation and indoor air pollution.

## iii. Approach

Modeled after the successful OAQPS approach, the approach includes the following steps:

- **Assess OIRA's current tribal programs.** ORIA developed a baseline assessment of tribal activities and accomplishments from the last several years, based on input from ORIA Offices and Regional IAQ contacts. This baseline assessment was valuable for planning the development of the ORIA Tribal Strategy.
- **Gather input from tribal professionals.** ORIA met with a small group of experienced indoor air and radiation tribal professionals to gather input on what has been working and what can be improved in their work. In order to capture the most robust information, ORIA gathered input during listening sessions with both indoor air quality and radiation professionals, separately. Input received during these initial listening sessions was used to develop a "straw" strategy on which a broader group of tribal professional could provide feedback.
- **Develop a draft strategy.** Using this input, ORIA drafted a "straw" strategy, which serves as a focal point for engaging and soliciting feedback from all interested tribes. The following items were drafted during the strategy development process:
  - A list of priorities and recommendations based on the information gathered from the baseline and the listening sessions.
  - An internal ORIA draft plan of priorities, commitments and actions.
- **Invite comments from tribes.** The "straw" strategy will then become available for comment by all interested tribes. ORIA will obtain feedback:
  - During a breakout session at the National Tribal Forum on Air Quality, held May 21–24, 2012, in Tulsa, Oklahoma.
  - Through conference calls and/or webinars with interested tribes.
- **Consider and respond to tribal comments.** ORIA will review all comments received.

<sup>2</sup> Refer to EPA's FY 2011-2015 Strategic Plan, available at <http://www.epa.gov/planandbudget/strategicplan.html>.

- **Finalize Strategy and Plan.** ORIA will develop a final ORIA Tribal Strategy and Plan that incorporates the feedback from tribes.
- **Communicate and implement the plan.** Once the final Strategy and Plan are complete, ORIA will conduct outreach and communications regarding these items and begin its implementation process.

## II. ORIA Tribal Activities Baseline

The initial step in the ORIA Tribal Strategy and Plan development process was to review the current state of ORIA's tribal activities, in order to characterize and learn about tribal activities to date. EPA surveyed each ORIA division and laboratory, as well as the nine EPA Regional ORIA tribal programs, to identify current activities, accomplishments and successes, partnerships, barriers, lessons learned and additional information. This baseline data was collected from August 2011 through January 2012.

The baseline survey identified great diversity across tribal programs and activities regarding:

- Resource availability and investment.
- Regional approaches.
- Relative priorities.
- Individual commitments of EPA and tribal staff.

The survey identified common elements to tribal program successes including: committed, empowered tribal champions, partnerships and leveraging of resources, and sustained investments. The survey results also indicated that there is an opportunity to improve the relationship between tribes and EPA Headquarters and Regional offices.

Through the survey, it was identified that resources, such as staffing, funding and technical support, are directly tied to tribal program sustainability. Tribal programs rely on EPA funding to support staffing and program activities. When funding decreases or is not available, tribes cannot sustain corresponding program activities. Staff turnover, competing tribal priorities, and other barriers to tribal program development and success were also identified. Lack of resources within EPA — especially dedicated indoor air quality staffing — was also identified as a barrier to initiating and nurturing tribal program development.

Significantly, the baseline survey identified the lack of a comprehensive strategy across the ORIA activities/programs for setting priorities, guiding investment, and optimizing programmatic outputs and outcomes.

ORIA used the survey results to identify conversation topics for the tribal listening sessions, and were taken into consideration for the purposes of selecting activities and commitments included in the Strategy and Plan.

## III. Identified Tribal Priorities and Recommendations

Following the baseline assessment, EPA held listening sessions with tribal indoor air quality and radiation professionals — for the purposes of learning about the challenges and barriers that tribes face, firsthand. During these sessions, ORIA also heard examples of tribal success stories and significant environmental and public health protection accomplishments.

The following preliminary priorities and recommendations are based on the input collected through the baseline assessment and the listening sessions. These ideas will be expanded, revised and prioritized throughout the development process.

## **Tribal Priorities**

- i. Improved Relationships and Communications
- ii. Technical Support and Expertise
- iii. Environmental and Health Impacts
- iv. Collaborative and Holistic Approach
- v. Program Sustainability and EPA's Commitment to Programs
- vi. Tribal Sovereignty and Culture

### **i. Improved Relationships and Communications**

Tribal participants in the listening sessions emphasized the importance of developing and fostering a collaborative relationship with ORIA, focused on effective, regular and timely communications. Tribal participants also emphasized that ORIA staff members must be open-minded and willing to work with the tribes in a manner that does not make tribes feel "second class."

#### **Recommendations for Activities:**

##### *Communications*

- Promote interaction and relationship building through regular phone or in-person meetings with Regional and Headquarter representatives that allow tribes the opportunity to express their questions, challenges and concerns.
- As some tribes have a trickle-down system, direct mail to tribal leaderships or designated environmental program leads, for distribution to all tribal members.
- Participate in tribal meetings, events and conferences in order to engage and build relationships with the tribes. Ensure Regional, Headquarters and senior management participation at these events.

##### *Relationships*

- Foster and leverage internal and external partnerships, such as with other EPA offices, including OAQPS, and outside organizations, such as the National Tribal Air Association (NTAA) and the Institute for Tribal Environmental Professionals (ITEP).
- Demonstrate ORIA's commitment to working with tribes and express a commitment to helping tribes address critical environmental issues.
- Include tribes in the development of plans and strategies, and obtain input from tribes on effective implementation strategies and approaches.

##### *Resources*

- Leverage current outreach methods, such as the IAQ Tribal Partners Program website, to promote EPA's activities, resources and tools. The website could include information on funding opportunities and Regional contacts, and it can serve as a central hub for information sharing.
- Tailor and/or develop communications and outreach materials (including educational information on IAQ and radiation risks and concerns) to meet tribal needs and capabilities.
- Work with local leaders to develop materials specific to local concerns in order to develop trusted community resources.

## ii. Technical Support and Expertise

Both indoor air quality and radiation professionals expressed a need for internal and external technical support and expertise. Tribes need internal technical expertise to address local indoor air quality and radiation concerns and need access to external technical resources via phone, email or in-person. Internal expertise can be gained by adding a staff position within the tribe and by training existing staff. Tribal representatives expressed a need for professional technical assistance and for more Web-based or classroom training opportunities at all levels.

Tribal representatives also expressed the need for more equipment and access to expertise on tools, equipment and instruments. This support should be specific to each tribe's needs (e.g., the Tribal Air Monitoring Support Center [TAMS] professional assistance model). Providing internal and external expertise will empower tribes to solve environmental problems. Through increased knowledge and confidence in technical issues, this support, along with a holistic approach, will help tribes to become empowered in order to take care of their own issues.

### Recommendations for Activities:

#### *Training*

- Leverage additional opportunities for sharing support and expertise, for example with Montana State University and the Tribal Air Monitoring Support Center (TAMS).
- Address the demand for radon testing and mitigation training.
- Provide in-person technical trainings on indoor air quality issues and radiation monitoring and testing to help tribes obtain baseline data and conduct evaluations. Ensure that trainings are appropriate for the target audience (e.g., housing staff).
- Provide trainings on how to start indoor air quality programs and provide professional assistance to tribes to implement indoor air quality programs, with the opportunity for more advanced training.

#### *Professional Assistance*

- Provide greater access to technical experts who can be contacted when tribes have questions or concerns regarding technical topic areas (e.g., Regional Offices, TAMS, IED).
- Offer quality assurance (QA) support and other technical assistance with radiation monitoring.
- Create professional assistance support staff positions for indoor air quality that are available by phone, email and onsite as needed.

#### *Equipment*

- Provide information and recommendations on equipment for purchase or loan.

#### *Resources*

- Provide technical resources, materials and tools on the following topics: mold, black mold, asbestos, carbon monoxide, lead, gas leaks, radon, radiation, etc. Technical resources should be available through a variety of channels, including online, webinars, in-person meetings, etc.
- Provide Region-specific guidance, including guidance appropriate for tribes located in extreme climates.
- Support tribal eco-studies (e.g., fish and vegetation analysis).

- Tailor and/or develop communications and outreach materials (including educational information on IAQ and radiation risks and concerns) to meet tribal needs and capabilities.

#### *Staffing*

- Promote and encourage the use of tribal instructors and staff, when possible.
- Support funding of tribal IAQ and radiation positions.

### **iii. Environmental and Health Impacts**

Tribal participants in the listening sessions emphasized that their primary area of focus is protecting public health in the tribal communities where they work. Many tribal professionals work on outreach to community members to alleviate fears, educate the public on the importance of indoor air quality, and explain risk reduction measures. Tribes need more research and information on the impacts of indoor air quality and radiation on tribal members, and need to understand how best to relay this information.

#### **Recommendations for Activities:**

##### *Resources*

- Improve the dissemination of peer-reviewed information and measurement recommendations standards (e.g., ASHRAE).
- Provide better data and evidence connecting indoor air quality and health effects (e.g., school absenteeism, asthma rates).
- Provide compelling information that can be used to secure buy-in from community members, including elders and tribal council members (e.g., wood smoke, tobacco smoke).
- Conduct research and/or present compiled data on the effects of indoor air quality on serious health conditions, including heart attacks, diabetes, strokes, etc.
- Provide guidance on financial incentives and savings to help convince tribal councils and elders to take action on indoor air quality priorities.
- Conduct research and/or present compiled data on indoor air contaminants and identify thresholds for indoor air quality and safety (e.g., acceptable levels for carcinogens). Tailor and/or develop communications and outreach materials (including educational information on IAQ and radiation risks and concerns) to meet tribal needs and capabilities.

##### *Professional Assistance*

- Address tribes' concerns about the long term "temporary" storage of radioactive materials and wastes and states' abilities to increase storage capacity.
- Provide support for tribal eco-studies (e.g., fish and vegetation analysis).

### **iv. Collaborative and Holistic Approach**

Tribes need more community-based, local and Regional collaborations to promote behavior change, including collaboration across federal agencies on shared healthy homes priorities.

#### **Recommendations for Activities:**

##### *Relationships*

- Promote collaboration between EPA (Headquarters and Regions) and tribes through regular conference calls and meetings.
- Promote consistent guidance and decision-making approaches across Regions.

- Provide clarification and consistency on EPA Headquarters and Regional contacts working on tribal issues.
- Provide guidance on how tribes can make indoor air quality related inquiries to EPA, and a list of appropriate contacts.
- Provide greater collaboration with tribal housing authorities, so tribal indoor air quality and radiation professionals can work with housing residence and maintenance staff on issues.
- Leverage the expertise of tribes and promote feedback loops that allow EPA to gain more information and knowledge directly from tribal professionals.
- Promote tribe-to-tribe partnerships and collaborations.
- Promote greater collaborations between EPA and the U.S. Department of Housing and Urban Development (HUD).

#### *Professional Assistance*

- Provide tribes with greater assistance and information on how to incorporate and collaborate with various aspects of their tribal government on IAQ and radiation work (e.g., tribal Departments of Justice, tribal councils).

#### *Resources*

- Develop and promote an interagency tribal indoor air quality portal or website.

### **v. Program Sustainability and EPA's Commitment to Programs**

Tribal representatives raised the issue of funding throughout the indoor air quality and radiation listening sessions. EPA funding is critical to tribal programs and tribes need to know what resources and opportunities are available — and how to access them. ORIA needs to clearly understand tribal limitations related to indoor air quality, and that successful tribes will require a longer time period to build a program, establish relationships and train staff members.

#### **Recommendations for Activities:**

##### *Resources*

- Provide more information on regulatory issues, in order to promote how tribes can apply for funding for indoor air quality and radiation projects. Tribes need to know what can be done at the tribal level (e.g., standards and codes), which EPA may not be able to regulate.
- Implement a fair, transparent and consistent method for the allocation of resources.
- Provide awards and recognition to tribes that are doing exceptional work.
- Continue to provide tribes with needed resources and support for indoor air quality and radiation activities, including remediation projects and educational efforts.
- Provide greater funding for indoor air quality and radiation tribal programs, including radon testing and mitigation, radiation monitoring and other air programs.
- Extend application periods for tribal grants, as some tribes need more time to submit grants when they work in conjunction with their tribal councils on funding opportunities.

### **vi. Tribal Sovereignty and Culture**

ORIA recognizes tribes as sovereign nations, not just as stakeholders, and appreciates tribal politics, decision making, and cultural and social differences.

#### **Recommendations for Activities:**

- Recognize and appreciate tribal politics and decision making.
- Recognize and appreciate cultural and social differences.

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IV. ORIA Tribal Program Plan

## Current and Planned Activities by Tribal Priority

Green = Current / Blue = Planned

Category	Activity	Description	Status	Contact
<b>Priority Area: <i>Improved Relationships and Communications</i></b>				
Current	ORIA Tribal Strategy and Plan	ORIA Strategy and Plan for making tribes a more essential component of ORIA programs and will act as the basis for communications, collaboration and working with tribes.	Straw strategy and plan will be developed by May 24, 2012. Strategy and Plan finalized in September 2012.	Jed Harrison
	IAQ Tribal Partners Website	Designed to strengthen capacity and encourage action on IAQ in tribal communities.	Ongoing	Chris Griffin
	Participate in development and implementation of OAR Consultation Plan	Implementation Plan for how OAR (including ORIA) will collaborate and consult with tribes.	In Progress	Jed Harrison (for ORIA)
	TAMS Steering Committee	Participate (as ex officio) on TAMS SC.	Ongoing	TAMS Co-Director, R&IE Lab Director, ORIA Tribal Lead
	TAMS Management Team	Participate in planning and management of TAMS.	Ongoing	TAMS Co-Director, R&IE Lab Director
	Monthly National Tribal Air Assn. (NTAA) <i>Policy Call</i>	Forum for discussion on regulations, policy, guidance etc., affecting tribes.		Jed Harrison
	Monthly National Tribal Air Assn. (NTAA) <i>Executive Board Call</i>	Forum for coordinating tribal input and communication on indoor air topics.		Jed Harrison
	Participate on EPA Tribal Science Council	Coordination with tribes on Tribal Science priorities (e.g. traditional ecological knowledge, climate adaptation).		Dennis O'Connor
Planned	Working Effectively with Tribes Training	Training for ORIA to help staff better understand gov't-to-gov't relationships, trust responsibilities, and cultural values of tribes to support a more effective relationship. ORIA HQ and Regional management and staff.	Planned for FY 2013	Jed Harrison
Planned	Designate ORIA Tribal lead – Jed	To be the “face” of ORIA tribal programs, and to lead tribal team and facilitate ORIA tribal	Complete	ORIA/IO

	Harrison	communication.		
Planned	ORIA Tribal Team	Composed of reps from RPD, IED, Labs, Lead Region. Meet regularly to update activities and discuss issues.	Mid Term	ORIA IO/Tribal Lead
<b>Priority Area: Technical Support and Expertise</b>				
Current	TAMS Center training	Technical training to tribal professionals – 1 advanced IAQ/WX course in 2012.	Ongoing	Farshid Farsi
	TAMS Professional Assistance	Ambient Air related.	Ongoing	Farshid Farsi
	TAMS Equipment Loan	Ambient Air related.	Ongoing	Farshid Farsi
	TAMS Gravimetric Support	Ambient Air related.	Ongoing	Farshid Farsi
	Radon and Weatherization Training	Combined Radon and Weatherization Training for tribes with demonstrated radon problem.	Pilot in FY 2012	Jed Harrison
	Tribal Partners Website	Designed to strengthen capacity and encourage action on IAQ in tribal communities.	Ongoing	Chris Griffin
	Tribal Uranium & Radiation Training Curriculum	Curriculum for middle school students. Funded in 2012.	In Progress	Andrea Cherepy
	IAQ Capacity Building (IED CA with ITEP)		Through 2015	Chris Griffin
Planned	Support Pilot/Special Projects with tribes to address unique problems, concerns, issues	Support proposals in OAR competitive process, grant work plans, and with staff technical assistance.	As needed (e.g., “healthy casinos” meeting)	ORIA Tribal Lead, Regions
<b>Priority Area: Environmental and Health Impacts</b>				
Current	Tribal Partners Website (and improvements)	Designed to strengthen capacity and encourage action on IAQ in tribal communities. (Add additional health impact information.)	Ongoing	Chris Griffin
<b>Priority Area: Collaborative and Holistic Approach</b>				
Current	Participate in EPA Tribal Green Building Codes Work Group	Promote tribal healthy homes through new construction and renovation.	Ongoing	Jed Harrison
	Participate in Regional TAC Calls	Promote collaborative holistic approach to work supported by air programs (Ambient, Indoor, Atmospheric, Mobile).	Ongoing	Jed Harrison
Planned	ORIA Tribal Team	Composed of reps from RPD, IED, Labs, Lead Region. Meet regularly to update activities and discuss issues.		Jed Harrison
<b>Priority Area: Program Sustainability and EPA’s Commitment to Programs</b>				
Current	ORIA Tribal Strategy and Plan	ORIA Strategy and Plan for making tribes a more essential component of ORIA programs and will act as the basis for communications,	Straw strategy and plan will be developed by	Jed Harrison

		collaboration and working with tribes.	May 24, 2012. Strategy and Plan finalized in September 2012.	
<b>Priority Area: Tribal Sovereignty and Culture</b>				
Current	Participate in development and implementation of OAR Consultation Plan	Implementation Plan for how OAR (including ORIA) will collaborate and consult with tribes.	In Progress	Jed Harrison (for ORIA)
Planned	Working Effectively with Tribes Training	Training for ORIA to help staff better understand gov't-to-gov't relationships, trust responsibilities, and cultural values of tribes to support a more effective relationship. ORIA HQ and Regional management and staff.	Planned for FY 2013	Jed Harrison

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