

ATTACHMENT D: Administrative Procedures for the Meeting

The meeting will be opened with remarks from a person filling the role of a designated official who will describe the ethics review procedure and the status of the members with respect to ethics compliance. We will have a period for public comments. Following that, the panel will deliberate on charge questions or groups of charge questions in a sequential order. A former EPA lawyer and a former EPA air science/policy expert will be available as a resource for IPMRP questions.

The goal of the deliberations is to develop “consensus” panel responses to charge questions relating to the review of the draft Policy Assessment and elicit the panel’s recommendation on the criteria and standards, as well as to consider other statements that the panel may wish to make. “Consensus” does not mean that all members of the panel must share or agree to the same viewpoints. “Consensus” means that all members of the panel agree that the written responses to charge questions and other written statements from the panel accurately reflect the views of the panel. If there are topics for which there are a diversity of viewpoints among members of the panel, the “consensus” response should accurately reflect such diversity of viewpoints. If a consensus response could not be achieved then it is acceptable for one or several panel members to express a dissenting opinion on all or part of the final report. The dissenting opinion will be captured in writing and included in the final report or the appendices.

The role of the chair is to facilitate the work of the panel. Examples of responsibilities of the chair are to monitor and guide progress on the agenda, enable panelists to have an opportunity to provide input and deliberate, assist the panel in identifying areas of consensus, and assist the panel in focusing on issues that require deliberation. The chair can also address issues regarding the scope of the panel’s work and recommend approaches to formulating and communicating advice.

The following are the most common procedural considerations for this type of meeting:

- The deliverable from the panel meeting will be a written report. The written report will include the following key elements: (1) a summary letter; (2) consensus responses to charge questions; and (3) individual member comments. The letter may additionally include consensus responses on other issues identified by the panel. The purpose of the letter is to concisely communicate the high level key findings and advice of the panel. The purpose of the consensus responses to charge questions is to provide more detail regarding the panel’s findings and advice.
- All panelists are invited and encouraged to prepare written pre-meeting comments that address charge questions relevant to each panelist’s expertise, as well as any other issues that the panelist may want to address that generally relate to the scope of issues for review of the draft Policy Assessment and of the PM NAAQS. See **Attachment G** for more details.
- The panel is in deliberation if more than half of its members are interacting in formulating a written or oral statement on an issue. Panel deliberations must occur in public. Small groups of panelists, representing up to less than one-half of the panel members, may interact offline to refine draft materials.
- For each charge question or related group of charge questions, discussants and lead discussants are assigned, as given in Attachment G. All of the discussants should prepare draft responses to the charge questions in advance of the public meeting, and may include these as part of their individual pre-meeting written comments. During deliberations at the public meeting, the lead discussant, with assistance from the other discussants, should formulate a draft consensus written response to the charge questions. Drafts of consensus

responses may be circulated among discussants for editing and revision, as long as the discussant group has fewer than 50% of panel members.

- During the course of the meeting, the lead discussant for each charge question should identify the top three to five key “bullet points” that might be included in the panel’s letter. This will enable the full panel to deliberate on key points for inclusion in the panel’s letter.
- All key points for the main letter from the panel to the Administrator and the docket, and for the consensus responses to charge questions, must be deliberated in a public meeting. No information not deliberated in a public meeting can be included in the letter or consensus responses to charge questions.
- Comments from individual members that are reported only as individual comments do not have to be deliberated in the public meeting. However, any individual comments that might inform the formulation of panel consensus on an issue will need to be deliberated with the panel. Thus, in sharing their individual comments with the full panel, individual panelists are encouraged to give priority to any points that they think should be considered by the full panel in formulating content for the letter or consensus responses to charge questions, but reserve for their own individual written comments any other content.
- Individual panelists should not engage in deliberations on studies that they authored or co-authored, or research for which they are or were a principal investigator or co-principal investigator. Panelists who are authors or leaders of such studies may respond to clarifying questions but may not otherwise interact with the panel on topics pertaining to such studies.
- Because it is unlikely that a complete draft of the letter and consensus responses to the charge questions can be completed by the end of the October 10-11, 2019 meeting, the panel will hold one (or more) follow-up teleconference(s). Prior to the follow-up teleconference(s), a draft letter will be prepared by the chair and drafts of consensus responses to charge questions will be prepared by the charge question discussant groups. The panel will deliberate in the follow-up teleconference(s) to revise, as needed, the draft letter and consensus responses to charge questions. The goal of the teleconference(s) is to, if possible, approve the final letter and consensus responses to charge questions. More details are given in Attachment G.
- Individual members of the panel may submit a final version of their individual comments up to the time of the follow-up teleconference.

The meeting is being sponsored by the Union of Concerned Scientists, a 501(c)3 nonprofit organization. UCS does not take policy positions on NAAQS criteria and standards, other than to advocate that independent science advice is followed.¹ UCS is funded by individual members and private foundations and accepts no money from corporations or government entities.² Panelists are compensated for travel to attend the October 10-11, 2019 meeting but are accepting no honoraria for the meeting. The content of the meeting is at the sole discretion of the Independent Particulate Matter Review Panel. The viewpoints and opinions of members of the IPMRP, and of the consensus of the IPMRP, are their own and do not represent any position of UCS.

¹ Goldman, G.T. 2015. Union of Concerned Scientists. Comment on EPA-HQ-OAR-2008-0699-2472: Proposed Rule: National Ambient Air Quality Standards for Ozone. <https://www.regulations.gov/document?D=EPA-HQ-OAR-2008-0699-2472>

² Union of Concerned Scientists. 2018. Internal Revenue Service Form 990. <https://www.ucsusa.org/sites/default/files/attach/2019/03/ucs-fy18-990.pdf>