Lessons Learned: Barriers to Measuring Compliance Assistance Outcomes

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Lessons Learned: Measuring Compliance Assistance Outcomes

December 6 2002

8:30-10:00

Kathleen Malone and Ron Lockwood

U.S. EPA

Overview

- This session will focus on:
  - measuring the success of compliance assistance activities and the barriers encountered while measuring these outcomes
  - pros and cons of mass mailing surveys and pre-post tests
  - dry cleaners and hospitals/universities

Dry Cleaners

On-Site Visits, Questionnaires, and Phone Calls

Measurement Tools Used

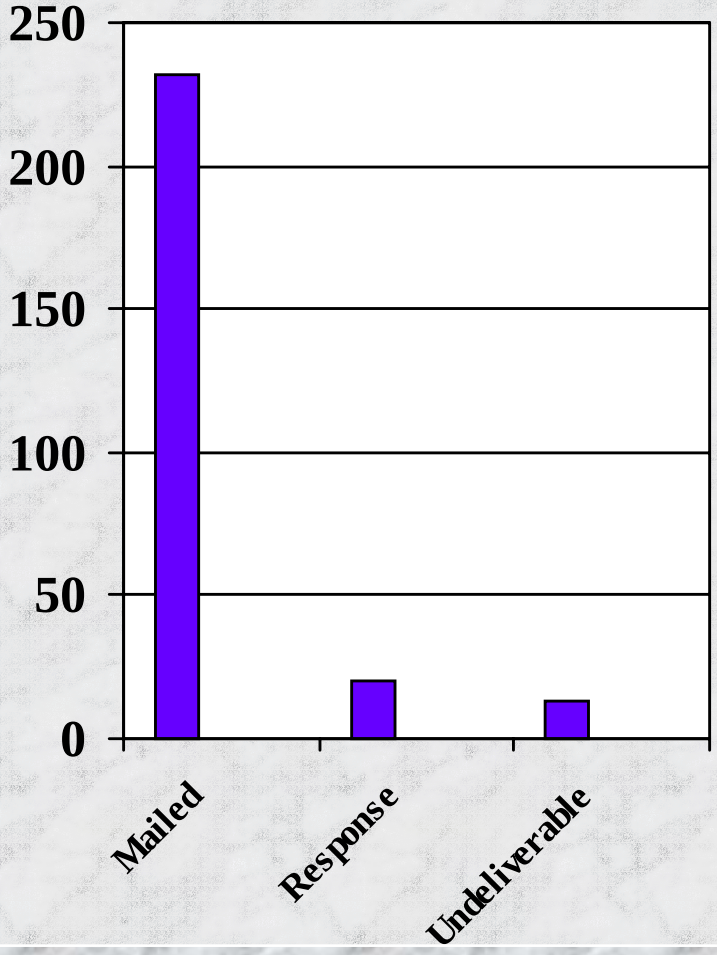
- Compliance Assistance Questionnaire - designed to assess the success of the on site program. Mailed to facilities on June 12, 2000
- Follow Up Phone Calls - to aid any facilities experiencing any unforeseen difficulties with the Questionnaire. July 3-6, 2000.
- Revisits - our original proposal included plans to revisit a small number of facilities who may now have a better understanding of the on site program. Due to information obtained through follow-up telephone calls, this phase of the evaluation was determined to be unnecessary.

Measurement Objectives

- Awareness of applicable regulatory requirements;
- Understanding of applicable regulatory requirements;
- Behavioral changes in record keeping and hazardous waste management; and
- Customer satisfaction with on site visit, program, and on site coordinators.

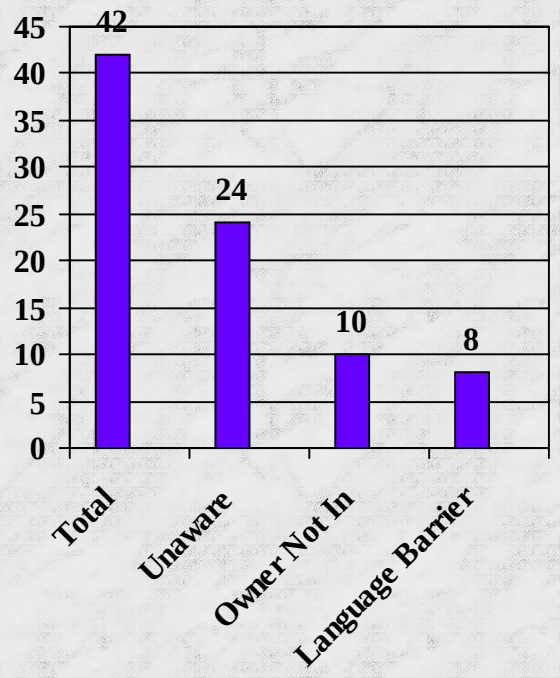
General Measurement Questionnaire Data

- Survey Mailed June 12, 2000
- Total of 232
- Undeliverable 13
- Responses Received 20
- Response Rate = 20/232 x 100= 9%



Description of Measurement Follow Up Telephone Calls (con't)

- **Follow Up Phone Calls. July 3-6, 2000**
- **Total of 42 (19% of non-respondents claimed to be unaware of mailing (some indicated they had a significant amount of unread mail).**
- **Owner not in store 10 (subsequent attempts to contact the owner unsuccessful)**
- **Language Barrier - 8**
- **Response Rate 0 - based on this response, follow-up site visits were determined to be an unwarranted expenditure of additional resources since they would be unlikely to produce additional useful data**



Estimated Cost

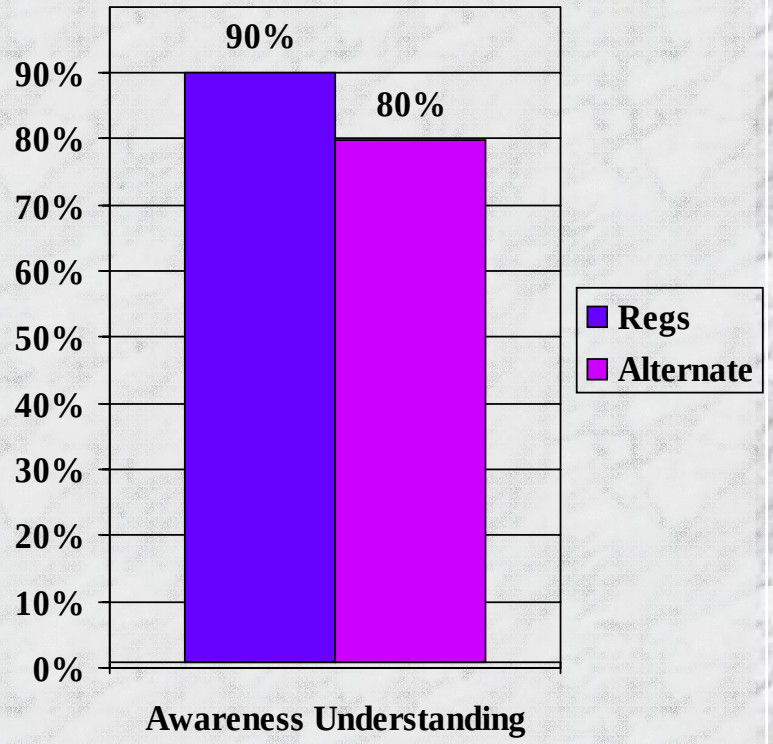
- Cost
  - FTE - $3148.20 (based on GS-12/03 hourly salary of $34.98)
  - Collective Respondents Burden - $123.00 (based on Bureau of Labor Statistics rate of $8.20 per hour per industry average)

Method of Survey Implementation

- Questionnaire created and mailed to facilities that previously accepted compliance assistance materials.
- Compliance baseline created for 3 fiscal years (97-99)
- Analysis of responses
- Follow up phone calls to facilities.

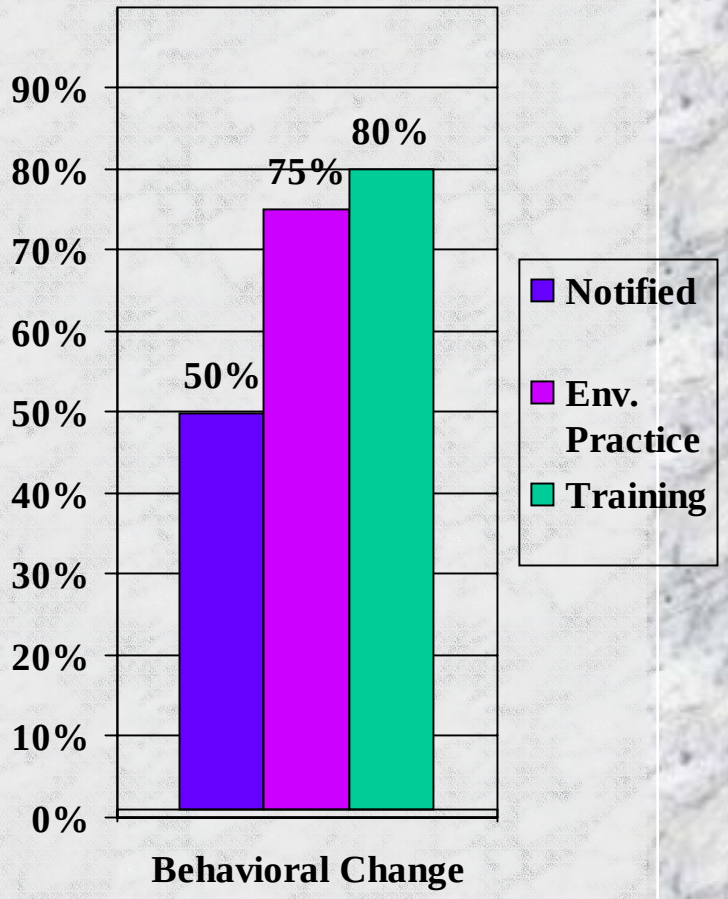
Awareness/Understanding

- Number of facilities that are either more aware of or have a better understanding of federal, state, and local regulations - 18
- Number of facilities That are aware of alternate technologies (C02, wet cleaning) - 16



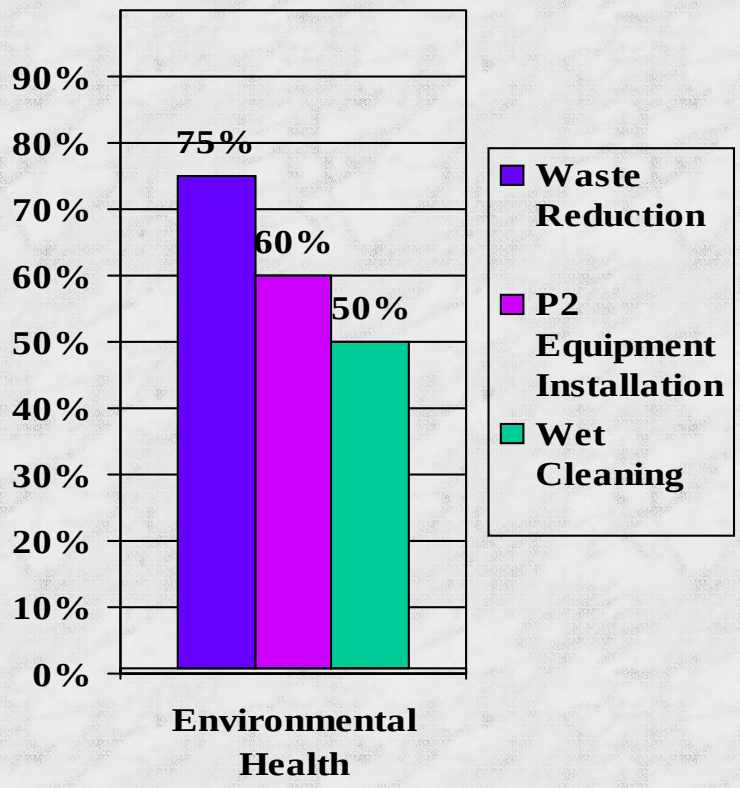
Behavioral Change

- Submitted notification report to EPA- 10
- Improved environmental practices (record keeping, machine maintenance, haz waste management) - 15
- Provide training for employees - 16



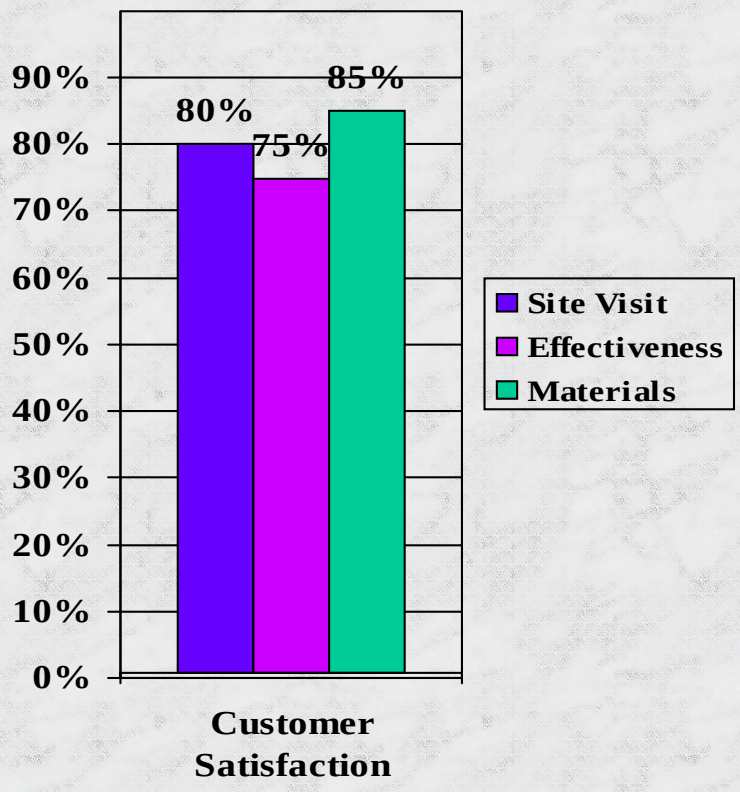
Environmental Health

- Number of facilities that have reduced the amount of perc waste generated - 15
- Facilities that have installed or plan to install P2 equipment - 12
- Facilities that implement or plan to implement wet cleaning - 10



Customer Satisfaction

- Number of respondents that accepted a full site visit - 16
- Respondents that found the site visit effective - 15
- Respondents that found the compliance assistance materials useful- 17



Hospitals and Universities

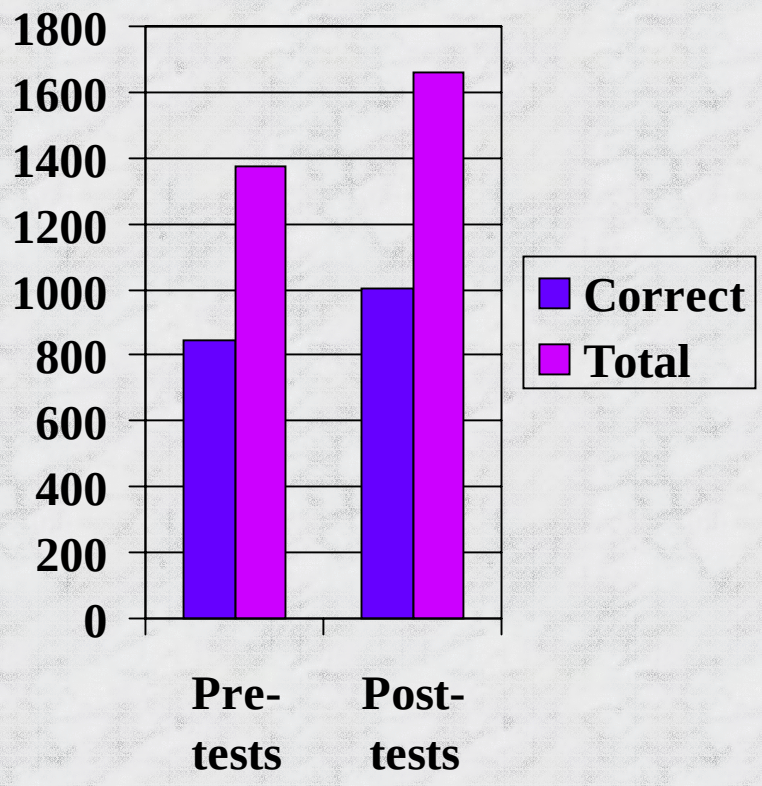
Pre and Post Testing at Workshops

Measurement Tools Used

- Summary:
  - Held two seminars for hospitals (1 with Region 1 which took place in Connecticut, and 1 with Region 3 which took place in Pennsylvania).
- Measurement Methodology
  - Administered pre testing prior to the seminar and post testing following each presentation (presentations were broken up according to media - RCRA, AIRS, CWA, EPCRA etc)

Increasing Regulatory Awareness

- Number of pretests administered - 164
- Number of participants who took pre test - 159
- Number of correct answers in pre test - 844/1376
- Number of correct answers in post test - 1004/1658



Barriers Encountered

- Language barriers between assistance providers and business owners limits, or prevents, successful transfer of information.
- More documentation needs to be translated into languages locally used (Korean and Spanish) to be effective.
- Inadequate resources available for successful revisit program

Barriers Encountered con’t

- Without enforcement support to handle ‘bad’ players the number of facilities who implement assistance recommendations are minimal.
- Compliance assistance over the telephone does not work UNLESS the facility initiates the communications flow.
- Attendees were not interested in being tested.
- Difficult to keep people interested as the day wears on making it hard to get participants for the post test.

Recommendations

- The following recommendations may help alleviate the problems which were encountered in the dry cleaning sector:
  - surveys should NOT be anonymous. Facilities will not respond if they feel there is no way of identifying them.
  - Pre-post questions should not be written until all presentation materials have been reviewed in order to ensure a connection between the two.