1[ST] ANNUAL EPA OECA GRANT CONFERENCE

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OPEN FORUM:
PANEL DISCUSSION DE-BRIEF, LESSONS LEARNED AND TIPS FOR PREPARING PRE-PROPOSALS

Presented by
Amy Porter, U.S. EPA, OECA, Panel #1A and #2
David Meredith, U.S. EPA, OECA, Panel #1B
Art Horowitz, U.S. EPA, OECA, Panel #3
David Piantanida, U.S. EPA, OECA, Tips for Preparing Pre-Proposals

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Discussion on Panel #1A and #2: Compliance Assistance/Outcome-Performance Measurement

Moderator: Amy Porter, U.S. EPA, OECA

Amy Porter, U.S. EPA, OECA
Discussion on Panel #1A

Yesterday we heard a lot about results, as well as study design and implementation. While results are what this conference is about, sharing study design and implementation is very important.

I will use the format Mike Stahl discussed yesterday for performance measures:

design ➜ implement ➜ use ➜ produce results

Design:

This is about how to get statistically valid results and how we capture results from inspections. We heard a lot about innovative designs - Michigan developed focus groups to evaluate their manual; MD has some creative community involvement; NH has piloted a project relying on partial 45 minute inspections; NEWMOA and NJ have developed multi-media databases to capture both outcomes and outputs.

Implementation:

This applies to all projects across the board. Many examples are of things that are being incorporated into our day-to-day work. Examples are: California focusing on sectors with historically low compliance rates; MD and NM focusing on Environmental Justice (EJ) communities; MD with community involvement; and Indiana integrating their universe data, demographic data and watersheds and using an integrated mix of tools and then going back to measure.

Challenges that were highlighted:

One was finding the resources to maintain these systems. What happens when you get a grant to build a system - who then pays to maintain it? We realize this is difficult, but it was not the intent of the grants to maintain systems.

Universe identification is also difficult.

Development of good technical materials for inspections or other things is resource intensive. Sharing is important so that we use our resources wisely.

Use:

This is an area where we are just now getting to. Can measurement data be used for targeting, modifying policies, and other things? In NH, they're using results to decide which part of the sector (FQGs or SMQs) to focus their attention on, as well as which violations to focus on. Also identifying risk-based areas to focus on. California developed a measure, and also showed a real improvement in compliance. That's the best scenario, where we have an effective measure and can actually see improvement.

We're looking forward to the Web site being up and everyone using it to see what others are working on.

We're also happy to be having this conference, and others like it.

I think I speak for all of OECA when I say we're very proud of your accomplishments and your work in this area.

Comment: Our agencies have established habitual ways of thinking. Our task is to find

important problems. The stakeholders and the public tell us what they are upset about. Being responsive, the agencies look at that those problems and find out what we want to accomplish and find a measure to determine where we want to be. Only then do we develop a strategy to achieve these measures. If our strategy doesn't work, we change it. If it works, we keep using it. But we do not change our measure. We cannot change our measure, or we lose credibility. You have to figure out where you want to go, and design your measure to account for that.
Response: Mike's model/outline pertains specifically to the measures, not to the strategies. It was intended to help develop measures for the OECA program.
Comment: You have to start with the end and work your way backwards. You have to know where you want to go. At some point you do need to be able to account and adjust for incremental improvement.
Comment: I would like to get some information on sustainability of performance measurement.
Comment: We do know how many inspections we do and how many people we visited. It's just a matter of taking the two pieces of information and putting them together. But it takes some activation energy to do it. You need to figure out what is needed for each sector, what approach will work and how much effort you need for a particular sector.
Response: As these projects get implemented, the "proof will be in the pudding." If any states can share advice about the short-term investment issues, that would be helpful.
Comment: It would be reasonable for a certain amount of resources to be committed to this. I see a disconnect between knowing 'this is the problem' and what are perceived to be problems.
Response: OECA is dealing with this through the PIAT team (Problem information Analysis Team) - in OECA, problems can be nominated to management. Florida has done a lot of this work, Malcolm Sparrow, and others, on problem-solving. Everyone agrees on certain problems, then chooses tools and measures.
Comment: That's difficult, because the national paradigm doesn't fit with individual state and regional issues. It used to work, but doesn't now with current environmental problems.
Response: Yes, and OECA has a new strategic planning process that builds in regional issues which addresses this.
Comment: Region 3's flexibility is very much appreciated by MD. You're paying us to think, and that really helps.
Comment: States need to read between the lines to maximize their outcomes and tell their Regional offices what fits the national priorities and how. This helps us go to the Hill and weather audits by the Inspector General (IG) and other things. It's when you go off on your own that the IG will get you for not following national priorities.
Comment - Region 2 asks how do we tie everything together - the EPGs (PPGs?), inspections, strategic planning, etc.?
Q: Has anyone estimated what it costs to maintain these systems?
A: $5- 15K for a contractor to come in and map data to PCS (translator). After that it's just maintenance. There is a need to constantly updated the UI which can cost $25K.
Lisa Rector, NESCAUM - It cost $100K to convert to an updated web-based platform and included NVRs, but the NVRs do change.

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Discussion on Panel #1B: Data Quality, Data Management, and Public Access

Moderator: David Meredith, U.S. EPA, OECA

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Discussion on Panel #1B

There were four exciting projects presented during Group 1B, and each had very tangible products which help us better manage our programs.

Dick Darling from Maine described the web-based system they use for collecting discharge monitoring reports, allowing facility operators to enter daily monitoring data and produce reports to submit to the state, and ultimately enter into PCS. The data quality of PCS has been criticized, and these days with ECHO and OTIS and the expansion of public access to information, initiatives that represent this new era of work really up the ante for data quality.

Nicole Heffington from Arizona presented AZURITE which created a module in a larger database that handles compliance/enforcement information on a multi-media basis. It standardizes a process that can generate enforcement letters directly from the system.

NV Raman in Delaware discussed their integrated internet public access project, DE navigator, which has an emphasis on providing information to the public, with a focus on RCRA and UST.

Lisa Rector of NESCAUM has two different grants. The most significant aspect is an upgrade to a translator program (takes data from a state/local/tribe/territory and translates it for submission to a national system). AFS currently translates data from about 71 other systems. Universal Interface (UI) is widely used to do this, and the NESCAUM project improves on it and makes it more usable. They are also working on quality assurance plans to ensure data quality plans are in place before data is transmitted.

These are great projects which improve our ability to do analysis and advance data management practices, and all are usable by other states. Maine has taken surplus computers to water systems for their use. Each project has a burden reduction element by reducing the burden of sending data either from the regulated community or partner governments to the feds.

These days with the expansion of public access to information, OECA providing money to these efforts is particularly timely.

Comment: For single media products there is often a constituency for getting the word out (re: the availability of and success stories from this Grant Program), but it's tougher for multi-media or integrated projects that don't always have a forum. However, all those national data conferences are a good forum to get information out.
Response: From OECA, there are no specific plans for an effort to make sure things are shared among states. But there is a requirement in the grants that states commit to sharing whatever

product is developed. For example, we gave a grant to Missouri to develop technology that no one has, so there won't be any conflict between software platforms. This is useful to us all. Two other ideas - I hope that these products are on the Compliance Assistance Clearinghouse Web site. Also for sector-based multi-media products, we have the Compliance Assistance Centers which fit and are a good forum. As states start using these products, it would be useful to have them report back on what's working and what's not.

Comment: In MD, the IT department can't always or is not willing to accommodate some of these things. The One-Stop program should bring the IT people in.

Response: One-Stop is still happening. There is a series of Web sites called WISER, and a lot of the information management activities are on there . It's run by ECOS. Take a look at that.

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Discussion on Panel #3:
Using Performance Measures in State/EPA Agreements

Moderator: Art Horowitz, U.S. EPA, OECA

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Discussion of Panel #3

Issues Relating to Performance Measures and Performance Partnership Agreements

Themes:

How do we create public value with performance measures? We can do that by using the performance measures in the agreements we negotiate. The most common agreements between EPA and states where performance measures can be most useful are grant agreements. Traditionally, the grant agreements have relied on output or activity measures. More recently, we have been emphasizing the use of outcome measures, particularly in Performance Partnership Agreements (PPAs) and Performance Partnership Grants (PPGs). This has been a significant change in the way we do business and it has not been easy to accomplish.

Performance measures are useful to our programs in several ways besides just being part of grant agreements. The outcomes derived from these measures can be used for strategic planning and priority setting at the state, regional, and federal level; for developing budgets; and for focusing on resource issues like investment and disinvestment; and for communicating results to the public. Moreover, we need to be thinking about how we link them to Performance Partnership Grant Agreements and to the overall goals and objectives.

There are difficulties in negotiating grant agreements, particularly PPAs and PPGs. The charts in Suzie Peck's presentation help to illustrate the point. Initially, the process looks simple and straightforward, but becomes complex and appears to be chaotic with the myriad connections between people, organizations, and stakeholders. The complexities of these negotiations can make it difficult to reach agreements. Therefore, it is important to develop a good framework for negotiating Performance Partnership Agreements.

Comments:

The discussion turned to the issue of committing to specific outcomes in grant agreements. It was initially suggested that when EPA and states are negotiating grant agreements, states can commit to perform outputs, but it would be more difficult to commit to outcomes without first clearly defining those environmental outcomes. Nonetheless, states and federal agencies must commit to doing everything possible to achieve well-defined environmental outcomes. Additionally, we should be able to show why we expect that our programs and strategies will attain the identified environmental outcomes, how we will evaluate their effectiveness, and be prepared to change our strategies if our programs are not achieving the desired outcomes.

As a follow-up to this point, it was noted that we will have to make firm commitments to outcomes, but that we should recognize that performance measures need to be developed reflecting these outcomes. There should be a recognition that targets might not be met. It was further noted that OMB is developing a method for measuring results in terms of outcomes, and grading all federal agencies, including EPA, on how well they perform. This is where OMB is headed on the use of performance measures, so we will need to commit to outcomes. Nonetheless, we will continue to need a mix of outcome and output information so that if we don't achieve our goals we can look at what we've done.

Another comment on this was that we all know how to count outcomes and outputs, but that we tend to set somewhat unrealistic goals. People want to see changes that look like pristine environments, but in fact we're trying to measure the changes in people's behavior that lead to that result, and compliance rates are useful performance measures.

Finally, it was suggested that everyone is going in all different directions, which might be a good thing for now while waiting to have sufficient environmental indicators. The point is, in time some form of standardization might be required, otherwise it will be difficult to achieve national-level measures.

The group discussed further whether the performance measures being developed represent environmental outcomes. In the case of auto body shops project, for instance, a change in compliance rate *does* indicate a change in emissions. It may not be very precise, but it is a way to get from behavior change to the impact on the environment. The air program makes the assumption that compliance with a certain standard can be linked to the reduction of a certain percentage of pollutant emissions. Massachusetts DEQ is taking the Environmental Business Practice Indicators (EBPIs) across a sector and trying to estimate a reduction in pollutants statistically. It may not be as precise as taking an environmental measurement, but statistically it could be deduced that if the sources in a sector are complying with the regulations, pollutant reductions should be expected.

Finally, we discussed how Performance Partnerships relate to agreements now being negotiated between EPA Region 6 and its states as a result of a recent Inspector General (IG) report on regional oversight practices. In these agreements, the Region has to tie activities to specific measures. This doesn't show the entire picture. They're having to say which goals have been met and which have not for agreements under the National Environmental Performance Partnership System (NEPPS). It's hard to know what to do. It was noted that one of the objectives of the NEPPS was to reform the oversight process, to move away from case reviews and after-the-fact oversight. This has been difficult to achieve. The intent of NEPPS was to develop a system for reducing oversight for good environmental performance and continuous improvement by the states. In the Region 6 situation, since an IG audit noted specific deficiencies in oversight and performance, a more strict form of oversight will be required.

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Presentation:
Tips for Preparing Pre-Proposals

David Piantanida, U.S. EPA, OECA

TIPS FOR PREPARING PRE-PROPOSALS

David Piantanida
April 15-16, 2003

Notes

The Call for Pre-proposals

- The Federal Register Notice
- E-mails and website links informing eligible grantees that funds are available
- Regional Office Contacts – distribute Notice

Notes

- *We rely on the American Indian Environmental Office, other EPA Offices, and our regional offices to distribute this Notice. We try to keep it open for 45 days, and this year it closes on May 5.*

The Notice

- Read and Read again and ask questions
- Become familiar with the sections of the Notice
  - The Eligibility criteria
  - The Funding Area and Criteria
  - Closing date
  - Pre-proposal format and length

Notes

- *As for the Notice, please read it closely. You can call David or your Regional contact if you have questions.*
- *We usually have about $2M in funding available. This year we have $1.5M, because we're funding a few high-priority projects in the states.*

Eligibility

- Review Eligibility criteria
- If you are not sure – contact your regional office or you may contact me directly at (202) 564-8318

Notes

- *Historically, states have received most of the funding. However, tribes are beginning to submit very good pre-proposals and this year local governments were explicitly mentioned in the FR Notice.*
- *The OSW tribal person in attendance here (Charles Bearfighter-RedDoor) may be able to address working with tribes and possible synergies at the next conference.*

Funding Areas

- Most important factor in the Notice
- Make sure you understand the funding area
  - Review description and criteria
  - Ask questions
  - Please don't "parrot" back the example in the Notice
  - Only address one funding area per pre-proposal

Notes

- *We suggest you don't mix funding areas in a single pre-proposal. You can include a short overview of the two if you want to make a connection, but don't combine it into one proposal.*
- *Comment: We would like the funding area options (topics) broadened.*
- *Response: There is a concern that if we broaden the array of projects we are willing to fund, OECA will just get too many proposals. It's a double-edged sword.*
- *Comment: Being able to get or apply for a grant helps the states justify their work with the governor's office and keep their projects going.*

Pre-proposal Format

- Follow the Format in the Notice
  - Project information
  - Summary project goals
  - Summary work plan
  - Project milestones
  - Project costs

Notes

- *Look at the format guidelines.*
- *It makes it a lot easier for the reviewer if they're all in a consistent format.*
- *Try to keep the proposals to 5 pages.*
- *We follow the criteria outlined in the FR Notice very closely. This year there are points/weights assigned to each criteria.*

Other Tips

- Get Smarter with Results/Outcomes
  - The Yellow Book:
  - http://www.epa.gov/compliance/resources/policies/planning/results/cameasuring.pdf
- Ask Questions
- Grant Writing Tutorial
  - http://www.epa.gov/seahome/grants.html

Notes

What do we look for?

- Short – no more than 5 pages
- Well written and specific:
  - Project Focus, problem being address
  - Pick one funding area
  - Project activities are clear and results can be shared
  - Project Milestones with dates and project costs
  - We look closely at Project Costs (e.g. reasonable)

Notes

- *Please send all proposal information together at the same time.*
- *Make sure your costs are realistic as well as reasonable.*
- *Reference the "Yellow Book" for compliance assistance measures, as well as the grant writing tutorial on the STAG Web site.*

What we Look for (cont)?

- Project meets FR Notice criteria
- Past Performance (i.e., quarterly reports, results/outcomes, timely final report)
- Regions concur that a pre-proposal is acceptable

Notes

- *Also, we are looking at past performance, and the Web site now helps us do that. This includes whether quarterly /semi-annual reports are submitted on time, as well as results and a timely final report.*

Questions and Answers

- Contact David Piantanida , (202) 564-8318
Office of Compliance STAG Program Manager
Piantanida.david@epa.gov

Questions and Answers

- *Q: How does EPA come up with the funding areas?*
- *A: We don't come up with those ourselves. A memo went out last December 4 from Mike Stahl to the Regions and programs, saying we have funds, outlined those areas we've funded in the past, and gave them time to respond to our suggestions. The memo may not have made it to the states and tribes, but the Regions were encouraged to share it. It's not unusual for me to receive as many as 50 ideas, and then we assess and group them. Many came in as data management/data quality, so we worked on a specific AFS/PCS data quality area in order to be more focused.*

Questions and Answers

- *Q: Can you talk about the issue outlined in the grant review and award process regarding how transferable things are? It used to be a requirement.*
- *A: Transferability it is not a requirement now, but it is encouraged and is mentioned in the Federal Register notice.*
- *Q: Will you be dividing funding so that half is training and half is data management?*
- *A: No, we focus on quality. There is no pre-determined distribution between funding areas or Regions or anything else. We focus on how well it's written, if the grantee did their homework, and what we're going to get from this.*

Questions and Answers

- *Q: What is the role of the Region in deciding what gets funded?*
- *A: We're involving the Regions much more this year. Each Region will be making the first cut, and will only be sending the top proposals to HQ. Last year the Region listed their top proposals but sent them all on to HQ. The Regions will include an evaluation form so that we know why they made the cut. This eliminates the problem of having the Region managing a project that HQ selected but the Region thought wasn't good.*

Questions and Answers

- *Q: Can the Region recommend a national project officer for certain projects?*
- *A: Yes.*
- *Q: Can we let people know when updates are made to the Web site, so they can go and look?*
- *A: Yes, we will do that.*