



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
ENVIRONMENTAL INFORMATION

Mr. John L. Howard, Jr.  
Chair, National Advisory Council for  
Environmental Policy and Technology  
Vinson & Elkins LLP  
2801 Via Fortuna  
Austin, Texas 78746-7568

Dear Mr. Howard:

I want to thank the National Advisory Council for Environmental Policy and Technology (NACEPT) and the NACEPT Information Access Workgroup for the thoughtful recommendations provided to the U.S. Environmental Protection Agency (EPA) on the Draft Information Access Strategy. We know this was a busy time for the Council, and we appreciate your timely review.

As you know, EPA recently concluded its year-long *National Dialogue on Access to Environmental Information* to learn about the environmental information needs and access preferences of EPA's major audiences. Our goal in undertaking the National Dialogue was to develop an information access strategy that will enhance access to EPA's environmental information and make EPA's information more valuable. NACEPT's recommendations have been instrumental in finalizing the Access Strategy, which we plan to release shortly. EPA also plans to release an implementation plan for the Access Strategy this spring. Through these two documents, EPA will identify and address the access priorities of EPA's information audiences.

NACEPT's comments on the Access Strategy were both broad and thought-provoking. The enclosure to this letter contains EPA's responses to the findings and recommendations you provided in your letter. The NACEPT recommendations called for three types of Agency response:

1. Clarify or elaborate on a topic in the Access Strategy;
2. Emphasize certain ideas and issues in EPA's Access Implementation Plan now under development; and
3. Identify where and how EPA is addressing an important issue raised by NACEPT in another complementary Agency initiative.

Again, I thank NACEPT for its attention and guidance on improving EPA's Access Strategy. EPA is committed to continuing our efforts to improve access to our information, and we look forward to continuing our cooperative relationship with you and the Council in the coming years.

Sincerely,

Molly A. O'Neill  
Assistant Administrator  
and Chief Information Officer

Enclosure

cc: Jeff Crane, Co-Chair, NACEPT Information Access Workgroup  
Carolyn Green, Co-Chair, NACEPT Information Access Workgroup  
Linda A. Travers, Deputy Assistant Administrator, Office of Environmental  
Information  
Mike Flynn, Director, Office of Information Analysis and Access  
Rafael DeLeon, Director, Office of Cooperative Environmental Management  
Megan Moreau, NACEPT Designated Federal Officer

Response to NACEPT's *Draft Information Access Strategy*  
Findings and Recommendations

The following provides EPA's response to the findings and recommendations laid out in NACEPT's letter to the EPA with its review of the *Draft Information Access Strategy*.

**Finding #1:**

EPA does not address the importance of data quality in the Access Strategy, nor does the Strategy clearly articulate EPA's approach for improving data quality.

NACEPT recommended that EPA clearly articulate in the Access Strategy how it plans to address data quality issues. NACEPT also recommended EPA use metadata to differentiate the data that have higher levels of data quality. EPA agrees with this recommendation, and it will highlight in the Strategy the importance of informing secondary users of the quality and suitability of existing resources for uses other than the primary uses for which the data were originally designed. EPA will highlight the importance of using metadata to provide this type of information. In addition, the Access Strategy will highlight EPA's Quality Policy as the embodiment of the key EPA principles of data and information management.

NACEPT also recommended that EPA conduct an assessment of the expense associated with meeting data/information quality, and provide this assessment to the public. While conducting such a study would have benefit, the Quality Policy is focused on promoting adherence to Agency quality-related requirements and procedures, thus ensuring that all Agency data and information will be of known quality, transparent and credible.

**Finding #2:**

EPA should elaborate in the Access Strategy how it plans to support front-line providers of information (referenced in *Recommendation 2: Improve People's Understanding of EPA Data and Information to Promote Appropriate Use*). For instance, will EPA provide front-line providers with training, new information resources, analytical tools, or financial support? If EPA anticipates using more active support of front-line provider organizations, EPA should clarify what qualifies a particular group for such support (i.e., neutrality of perspective, groups with a range of perspective, etc.).

While EPA learned a great deal about front-line providers during the National Dialogue, the Agency recognizes the need to better define who they are and understand their needs in order to support them. NACEPT recommended that EPA provide training for front-line providers. EPA agrees that online training is important for front-line providers. In the Access Strategy, EPA discusses the *Navigate EPA* program, designed to familiarize librarians, science teachers and other intermediaries with the vast resources on EPA's Web site. *Navigate EPA* is a set of interactive, online tools including Webinars, virtual visitor centers and podcasts that will be available in Spring of 2009. EPA will strengthen the *Navigate EPA* description in the Access

Strategy, so it is more apparent to readers what tools EPA is developing to assist front-line providers.

NACEPT also recommended that EPA provide front-line providers with information technology (IT) support or IT grants to assist in their effective distribution of information. While it would be difficult for EPA to provide direct financial support to front-line providers, given their number and variety, EPA supports the idea of providing information technology tools to these groups. Some EPA programs, such as the Toxics Release Inventory (TRI) program, already provide such tools. EPA is partnering with the Environmental Council of States (ECOS) to develop a one-stop point of Web access to a wide variety of information about the Toxics Release Inventory and other related data. This collaborative Web site will allow EPA and other individuals from government, public interest groups, industry and academia to work together to support the public in finding, understanding, and using environmental information. EPA will investigate whether this type of program is an effective and viable solution that other EPA programs should model.

**Finding #3:**

EPA provides a great deal of environmental information on its Web site, but one specific piece of information that is important but not clearly articulated on the site is EPA's priorities.

NACEPT recommended that EPA clearly articulate its priorities on the EPA Web site. EPA's priorities are available to public audiences in the Agency's Five-Year Strategic Plan and Annual Performance Plan. EPA understands, however, that today readers would need to know to go to these documents on the Web site to find this information, since it is not prominently advertised and displayed on a Web page. EPA will address this topic in the Access Strategy by highlighting the need to raise the profile of existing introductory materials for easier access and use by the public. In addition, EPA will build upon its recently released e-Report on the Environment model as an approach to introduce readers to environmental topics using general, one-page discussions that feature digital links to successively more in-depth materials.

**Finding #4:**

The EPA should elaborate on specific strategies for improving available search tools within *Recommendation 1: Enable People to Find Environmental Data and Information at EPA and Other Federal Agencies.*

NACEPT recommended that EPA develop specific strategies for improving its search tools, and include these strategies in the Access Strategy. EPA considers the development of a clear, coherent strategy for improving search to be the most urgent priority in the Access Strategy. EPA will give search the full attention it deserves in EPA's *Access Implementation Plan*, which is being developing over the next few months. In addition, EPA will explore software design issues that may currently be preventing the public from accessing EPA information using commercial search engines.

**Finding #5:**

The EPA should more fully articulate in the Access Strategy the Tribes' role as a target audience group and information provider.

NACEPT recommended two areas within the Strategy where the Tribes' role could be highlighted. EPA agrees that Tribes were unintentionally omitted in the two places identified by NACEPT and will make the recommended language changes in the Access Strategy.

**Finding #6:**

The EPA should elaborate on the Access Strategy's metadata discussion.

NACEPT recommended that EPA add two refinements to the metadata discussion within the Strategy to ensure the following:

- EPA's metadata is readable.
- EPA's metadata is embedded in its databases so it travels with the data when downloaded.

EPA agrees with this recommendation and will add language to the Access Strategy highlighting that EPA's metadata should be readable by lay audiences interested in learning what questions EPA data and information are well suited to answer. In addition, EPA will add language stating that metadata should be embedded in the data and information they describe to ensure their inclusion with information transfers when downloaded.

**Finding #7:**

The Strategy does not articulate how EPA will institutionalize mechanisms to obtain feedback from the public.

NACEPT recommended that EPA address and articulate how it plans to make an institutional commitment to soliciting ongoing feedback about the value of the EPA Web site in meeting public information needs. EPA agrees with this recommendation and the Office of Environmental Information (OEI) intends to work with EPA leadership to identify priorities, roles and resources for soliciting ongoing feedback from Agency audiences on information access needs.

**Finding #8:**

EPA does not articulate in the Access Strategy the response trends from the National Dialogue.

NACEPT recommended that EPA articulate National Dialogue response trends in the appendix of the Access Strategy. EPA posted background documents related to the Access Strategy on EPA's National Dialogue Web page. These documents provide individual summaries for each of the five listening sessions held in the first half of 2008 with five major audience groups. The background documents also include summaries from ten less formal additional listening sessions

with a variety of stakeholder groups, including states and tribes. The findings and recommendations presented in the Access Strategy reflect the collective strength of this available information by highlighting priorities common to all five major audiences. EPA hopes to use future outreach efforts to elicit priorities from more narrowly segmented audiences.

**Finding #9:**

The Access Strategy does not address the relationships between this Strategy and other facets of what EPA is doing.

NACEPT recommended that EPA articulate in the Access Strategy the interrelationships between the recommendations in the Strategy and other related EPA initiatives. To address this recommendation, EPA added and strengthened references in the Access Strategy to highlight relationships with other facets of EPA's work.

NACEPT posed some questions for EPA to consider in addressing this recommendation in the Access Strategy. Specifically, NACEPT asked what priority information sources the public most wants to see, and whether this is information that EPA is collecting. The National Dialogue did not shed much light on specific information sources of interest to public audiences. Instead, discussion centered on the fundamental difficulties in finding, understanding and using many EPA information resources. EPA's goal for future outreach efforts is to learn more about information resources the public wants most.

**Finding #10:**

The supplemental Access Strategy document, "Current EPA Activities Related to Access Strategy Recommendations," needs to more clearly define EPA's policy for outdated information.

NACEPT recommended that EPA amend the language in the supplemental Access Strategy document to reflect language in EPA's policy on *Access to Current and Outdated Information on EPA's Web Site* (EPA Order 2190.8, 12/06/2004). EPA agrees with this recommendation, and will change the language in the supplemental Access Strategy as suggested by NACEPT.