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

OCT 11 2006

DEPUTY ADMINISTRATOR

MEMORANDUM

SUBJECT: State Reporting Burden and Measures Streamlining Initiatives

FROM: Marcus Peacock
Deputy Administrator

TO: State Environmental Commissioners
Regional Administrators

Meaningful performance data is central to our efforts in protecting human health and the environment. This past year there has been a growing interest within the U.S. Environmental Protection Agency and among our state partners to streamline the number of reporting requirements and measures that the Agency uses to manage environmental progress.

During EPA's preliminary FY 2008 budget discussions, the Environmental Council of the States expressed concerns about the overall burden of reporting requirements. To address these concerns, this memo initiates two efforts: 1) a *State Reporting Burden Reduction Initiative* to document the lowest-value reporting requirements imposed by EPA; and 2) a *Measures Review and Streamlining Initiative* to identify potential reductions in measures listed in the FY 2007 National Program Manager (NPM) guidance documents. These two efforts represent an important opportunity for states and EPA to assess and adjust reporting requirements and measures. The results of these complementary initiatives will be used to inform development of FY 2008 NPM guidance and measures, grant work plan negotiations, and discussions of future priorities.

We are asking for a small investment of your time to help these efforts succeed. For the *State Reporting Burden Reduction Initiative,* we request you use Attachment A to identify up to five reporting requirements that pose the highest burden and provide the lowest value. For the *Measures Review and Streamlining Initiative*, please use Attachment B to identify potential candidates for reduction or modification.

I expect both initiatives to follow a common schedule, including due dates and the more detailed milestones outlined in Attachment C. Please submit Attachments A and B to EPA by November 9, 2006.

For questions regarding the *State Reporting Burden Initiative*, please contact Pamela Luttner in the Office of Congressional and Intergovernmental Relations at (202) 564-3107 or at ***luttner.pamela@epa.gov***. For questions regarding the *Measures Review and Streamlining Initiative*, please contact Kathy O'Brien in the Office of the Chief financial Officer at (202) 564-1167 or at ***obrien.kathy@epa.gov***.

Thank you for your leadership and commitment in supporting these initiatives. These two efforts represent an important opportunity for states and EPA to assess and improve reporting requirements and measures. I intend to carefully consider all proposals that would enable us to more effectively and efficiently accomplish our collective program goals.

Attachments

cc: Assistant Administrators
Associate Administrators
General Counsel
Inspector General
Chief Financial Officer
Deputy Regional Administrators
ECOS-EPA Partnership and Performance Work Group

OMB Control No. 2090-0027
Approval Expires 4/30/2007

Attachment A
State Reporting Burden Review (Instructions Attached)

Due Date: November 9, 2006

STATE: **CONTACT PERSON: Name_____; Tel._____; e-mail_____** **DATE:**	
Reporting Requirement (please specify):	
Purpose (Please describe the intended purpose and use of the reporting requirement.)	
Type	☐ Report ☐ Data ☐ Measure ☐ Initiative ☐ Other (please specify)
Source of Reporting Requirement	☐ Guidance (Regional) ☐ Guidance (HQ) ☐ Statute (please reference) ☐ Other (please specify) ☐ Grants ☐ Regulation
Transmission	☐ Electronic (identify data base) ☐ Verbal ☐ Manual
Frequency (How often do you report this information?)	
Nature of Burden (Please explain why this requirement is a burden to your state.)	☐ Administrative ☐ Data Collection ☐ Other (please specify)
Recommendation and rationale (Please explain.)	

The public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Attachment A
Instructions for Completing the State Reporting Burden Review Form

Worksheet: To assist EPA in identifying specific reporting burdens, please list your state's top 5 high-burden, low-value reporting requirements using the attached form. Each state should complete one form per reporting requirement for a total of five forms/state. There are 9 fields that must be filled out. The forms should be filled out by staff with the most expertise and provided to EPA by the State Environmental Commissioners.

State/Contact/Date: A point-of-contact is necessary in the event that EPA has questions or requires additional information.

Reporting Requirement: Identify the specific reporting requirement in the space provided.

Purpose: Describe the state's understanding of the intended purpose of the requirement and indicate why you believe it is a requirement. Describe your understanding of how this data is used once it is reported.

Type: Identify whether the requirement is a report, measure, data, or initiative; if none applies, please explain what it is in the space provided.

Source: Indicate if the requirement is required by regional or EPA headquarters guidance, statute (include citation), regulation (include citation), grant workplan requirement, or other (including informal staff-level requests from the regions or headquarters). Specify or elaborate as necessary.

Transmission: Indicate mode of transmission for the requirement (whether electronically – in which case identify relevant data base, verbally, or manually).

Frequency: Indicate how often you have to report – yearly, monthly, biannually, or other.

Nature of Burden: Indicate whether the burden is the result of administrative, data collection, or other requirements. If other, please specify in the space provided. Also, briefly explain what is burdensome about this reporting requirement to your state.

Recommendation and Rationale: Indicate whether you recommend modifying or eliminating this requirement and provide appropriate rationale. Also, if you recommend modifying, please explain how you would change the requirement to decrease the reporting burden.

EPA Contact: By November 9, 2006, please forward the State Reporting Burden Review Form to Pam Luttner via e-mail at luttner.pamela@epa.gov or by fax at 202-501-1545 and submit a copy to your EPA Regional Administrator.

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Attachment B
Measures Review and Streamlining Form (Instructions Attached)

Due Date: November 9, 2006

State:
Contact Person: Name:_____; Tel._____; e-mail_____
Date:

Measures (identify by ACS Code)	Delete (D) or Modify (M) (if modify, please provide suggested language)	Rationale for Recommendation

The public reporting and recordkeeping burden for this collection of information is estimated to average 3 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Attachment B
Instructions for Measures Review and Streamlining Form

Worksheet: To assist EPA in identifying potential reductions in measures listed in the FY07 National Program Manager (NPM) guidance documents, EPA has made available a crosswalk of these measures on a password-protected website, Commitments QuickPlace. This crosswalk contains measures relating to state performance contributions which are included in the NPM guidance documents (issued in April 2006 and available at http://www.epa.gov/ocfo/npmguidance/index.htm).

Please list the measures you deem appropriate in the attached form which contains three headings and expands as necessary to accommodate your information. The form should be filled out by staff with the most expertise and provided to EPA by the State Environmental Commissioners.

State Contact Person: A point-of-contact is necessary in the event that EPA has questions or requires additional information.

Access to Website: You will be provided access to the measures via a password-protected URL by your EPA regional contact. Once you gain access to the QuickPlace, please review the FY07 crosswalk.

Filling out the Form: After your review, in the appropriate columns: (1) identify the measure (by ACS Code listed on the crosswalk); (2) note whether you recommend deleting or modifying it (and if modify, provide suggested language); and (3) provide a short explanation for your recommendation.

EPA contact: By November 9, 2006, please forward the form to Kathy O'Brien via email at obrien.kathy@epa.gov or by fax at 202-564-1433 and submit a copy to your EPA Regional Administrator.

Attachment C
State Burden Reduction and Measures Streamlining Initiatives
Key Milestones

Lead	Burden Reduction	Measures Review	Due Date
Deputy Administrator	kick-off memo to Regional Administrators (RAs) and State Environmental Commissioners		Oct 11, 2006
State Commissioners	recommendations on top 5 issues to RAs and OCIR (Attachment A)	recommendations to reduce/change measures to OCFO (Attachment B)	Nov 9, 2006
RAs	memo to OCIR assessing state recommendations in Attachment A	recommendations to reduce/change measures to OCFO (Attachment B)	Nov 21, 2006
OCIR/OCFO	initial synthesis of state/regional responses to states and EPA HQ and the regions	initial synthesis of state/regional responses to states and EPA HQ and the regions	Dec 1, 2006
HQ Program Offices (OAR, OECA, OPPTS, OSWER, OW, OEI, etc.)	recommendations to OCIR, based on review of state/RA input	preliminary list of FY08 measures, identifying those recommended for elimination/modification to OCFO	Dec 8, 2006
OCIR/OCFO	discussion with Agency senior management on initial results and recommendations		mid-Dec 2006
OCIR/OCFO	briefing for Deputy Administrator on initial results and recommendations		mid-Dec 2006
Deputy Administrator	review of draft FY08 NPM guidance, including draft measures and changes to reporting requirements;		Jan 2007
Deputy Administrator	communication from the DA on reporting burden reduction results		Feb 2007
NPMs	issue draft FY 2008 NPM guidance, which includes improvements to measures and reporting requirements		Feb 2007
States, Regions Tribes, others	formal review and comments to NPMs on draft NPM guidance, including proposed improvements to measures and reporting requirements		Feb-Mar 2007
NPMs	issue final FY08 NPM guidance with final measures and changes to requirements		Apr 2007