

OCFO RESPONSE TO ECOS COMMENTS ON EXTERNAL DRAFT FY 2016-2017 NPM GUIDANCES

ECOS Comment	Location in Draft Guidance	OCFO Response	Action Taken in Final Overview
<p>ECOS appreciates that beginning with FY 2016-2017, U.S. EPA is implementing a two-year cycle for the NPM Guidances. ECOS supports this transition implemented collaboratively with state partners. In particular, ECOS supports the focus on 1) earlier and more meaningful state engagement in joint priority setting; 2) clear support to pursue flexibility within the NPM Guidance documents including identifying areas where flexibilities can be sought and providing additional guidance for seeking approval; 3) utilization of multi-year grant workplans to allow for better alignment with the new two-year NPM Guidances; 4) better alignment of the NPM and Grant Guidances to help streamline and facilitate the grant work planning process and potentially reduce workload for states and EPA headquarters and regional offices.</p>	<p><i>Draft Overview to the FY 2016-2017 National Program Manager (NPM) Guidances (page 4); OAR, OW, OSWER, OECA, NEPPS Guidances</i></p>	<p>Thank you for your comment. We continue to value the importance of the co-regulator relationship among the states, regions, and NPMs, and collaborating on these documents is crucial to accomplishing our shared goals in protecting human health and the environment. We appreciate the state and ECOS representatives that participated on the NPM Guidance/NEPPS workgroup to help develop the new two-year process and the four key changes. We look forward to continue to work with you as we assess this new process and identify potential improvements.</p>	<p>N/A</p>
<p>ECOS recommends that EPA highlight language from each core NPM Guidance (OAR, OW, OSWER, OECA) that addresses support to pursue flexibility and guidance on how to seek flexibility approval. For instance, OECA includes discussion of flexibility within CMS and general guidelines for seeking flexibility in its Guidance on pages 3-4. ECOS recommends OECA's language along with specific language from the OAR, OW, and OSWER Guidance documents be provided in summary, perhaps as an appendix to the final "overview" document.</p>	<p><i>Draft Overview to the FY 2016-2017 National Program Manager (NPM) Guidances (page 4); OAR, OW, OSWER, OECA, NEPPS Guidances</i></p>	<p>Thank you for your comment. We continue to support the need for clear and transparent support for flexibility in the NPM Guidances. Revisions to flexibility information in the individual NPM Guidances will be identified in the respective NPM's response to comments. The NPM Guidance/NEPPS workgroup recommended keeping the flexibility information NPM-specific and centralized in the Introduction to each NPM Guidance and included in the narrative, as appropriate. Consistent with these recommendations, we continue to feel it is more appropriate to provide flexibility information within the specific context of the relevant NPM Guidance, rather than as an Appendix to the Overview, which is more general in nature and does not speak to specific programmatic issues such as statutes and regulations.</p>	<p>N/A</p>

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<p>ECOS and states are working with EPA's Office of Grants and Debarment and other EPA offices and regions to look at multi-year state grant workplans to align with the 2-year NPM Guidance cycle. ECOS supports this work and efforts to consider institutionalizing these discussions and decisions through language in Grants Policy Issuance (GPI) and other appropriate means.</p>	<p><i>Draft Overview to the FY 2016-2017 National Program Manager (NPM) Guidances (page 4); OAR, OW, OSWER, OECA, NEPPS Guidances</i></p>	<p>Thank you for your comment. EPA is making the use of multi-year grant workplans an agency priority to achieve better alignment with NPM and programmatic Grant Guidances and increase administrative efficiency. The Office of Grants and Debarment is revising GPI 12-06 to further encourage the use of multi-year grant work plans. The text in the Overview was revised to reflect the current effort.</p>	<p>Revised text on page 4</p>
<p>ECOS also recommends continued alignment and expansion of the issuance of NPM grant guidance on a two-year cycle to coincide with the 2-year NPM Guidances cycle.</p>	<p><i>Draft Overview to the FY 2016-2017 National Program Manager (NPM) Guidances (page 4); OAR, OW, OSWER, OECA, NEPPS Guidances</i></p>	<p>Thank you for your comment. We will continue to look at potential alignment of additional grant guidances.</p>	<p>N/A</p>

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<p>ECOS supports work to assist states in meeting their obligations to comply with Title VI of the Civil Rights Act of 1964. The Overview document references work being done on a “Compliance Toolkit for EPA Recipients” developed by OCR. States are working with OCR to develop this toolkit including identification of best practices. ECOS suggests language be expanded to note development of the toolkit by OCR and states.</p>	<p><i>Draft Overview to the FY 2016-2017 National Program Manager (NPM) Guidances page 4</i></p>	<p>Thank you for your comment. The text in the Overview was revised to more accurately reflect our engagement and collaboration.</p>	<p>Revised text on page 5</p>

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<p>ECOS urges EPA to include in all final NPM Guidance documents clear reference to the E-Enterprise for the Environment joint governance initiative between states and EPA. Specifically, ECOS requests each NPM include language generally defining E-Enterprise; language regarding how E-Enterprise concepts are being incorporated into each NPM's work; language explicitly recognizing that states need flexibility to adjust their work commitments and required outputs to be able to devote time to continuous process improvement efforts, including joint efforts with other states, tribes and EPA in support of E-Enterprise aligned activities; and language discussing that states may use categorical grant dollars to advance E-Enterprise aligned projects. ECOS also asks each NPM to provide examples in its final Guidance of specific E-Enterprise aligned work it is undertaking and examples of projects that states may similarly be undertaking. This may include efforts such as shared services development or implementation, LEAN and streamlining initiatives, e-permitting, E-Enterprise scoping team participation, development of E-Enterprise architecture and identity management, portal development, and other activities.</p>	<p><i>OAR, OW, OSWER, OECA, OCSPP, OEI, NEPPS Guidances</i></p>	<p>In response to your comment, we also included a new section in the Overview to address E-Enterprise for the Environment. Changes to individual NPM Guidances will be highlighted in the respective NPM's response to comments.</p>	<p>Added new text on page 3</p>