

GAP Guidance Evaluation (GGE) Phase 2 and Allocation

U.S. Environmental Protection Agency (EPA)

Revision and Consultation

Tribal Webinar

June 29, 2021

Overview - GAP Guidance Evaluation (GGE) Phase 2 and Allocation

- ▶ **Welcome**
- ▶ **Indian Environmental General Assistance Plan (GAP) Revisions**
 - ▶ Recap of GAP Guidance Evaluation (GGE) Phase 1
 - ▶ Path forward
 - ▶ GAP Framework
 - ▶ EPA/Tribal Workgroups
- ▶ **GAP Allocation**
 - ▶ Current allocation
 - ▶ Consultation
- ▶ **Final Revised Guidance and Allocation effective Oct 1, 2022**
 - ▶ How do we get there?

Recap of GGE Phase 1

▶ Purpose

- ▶ Evaluate what works/does not work with the 2013 GAP Guidance
- ▶ Identify opportunities for improvement

▶ Timeline

- ▶ Initiated Spring 2018
- ▶ Established EPA National Tribal Caucus (NTC) GGE workgroup
- ▶ Tribal Consultation
 - ▶ Over 800 individual tribal comments, 40 letters
- ▶ Internal input Fall 2018
- ▶ Consultation on Phase 1 closed Jan 2020
 - ▶ EPA will provide individual letter responses and general response to comments with Final Guidance

What did we hear?

- ▶ OITA needs to follow-through on national performance tracking and reporting without shifting burden to tribes
- ▶ Improve clarity and national consistency; minimize admin. workload (ETEPs, indicators)
- ▶ Increase flexibility so that tribes can focus on what is most important to them; do not treat all tribes the same
- ▶ Do not impose restrictions on GAP funds that are not required by the GAP Act; interpret the Act broadly
- ▶ Rescind the 2013 Guidance and use 2006 Guidance as starting point for revisions/improvements
- ▶ Provide GAP funding for program implementation beyond waste programs
- ▶ Remove burdensome documentation requirements for intertribal consortia
- ▶ Clarify the connection between GAP Guidance and Performance Partnership Grant
- ▶ Add Service Delivery per 2018 Appropriations authority

<https://www.epa.gov/tribal/gap-guidance-evaluation-phase-1-tribal-comment-summary>

Path Forward - GGE Phase 2

▶ Purpose

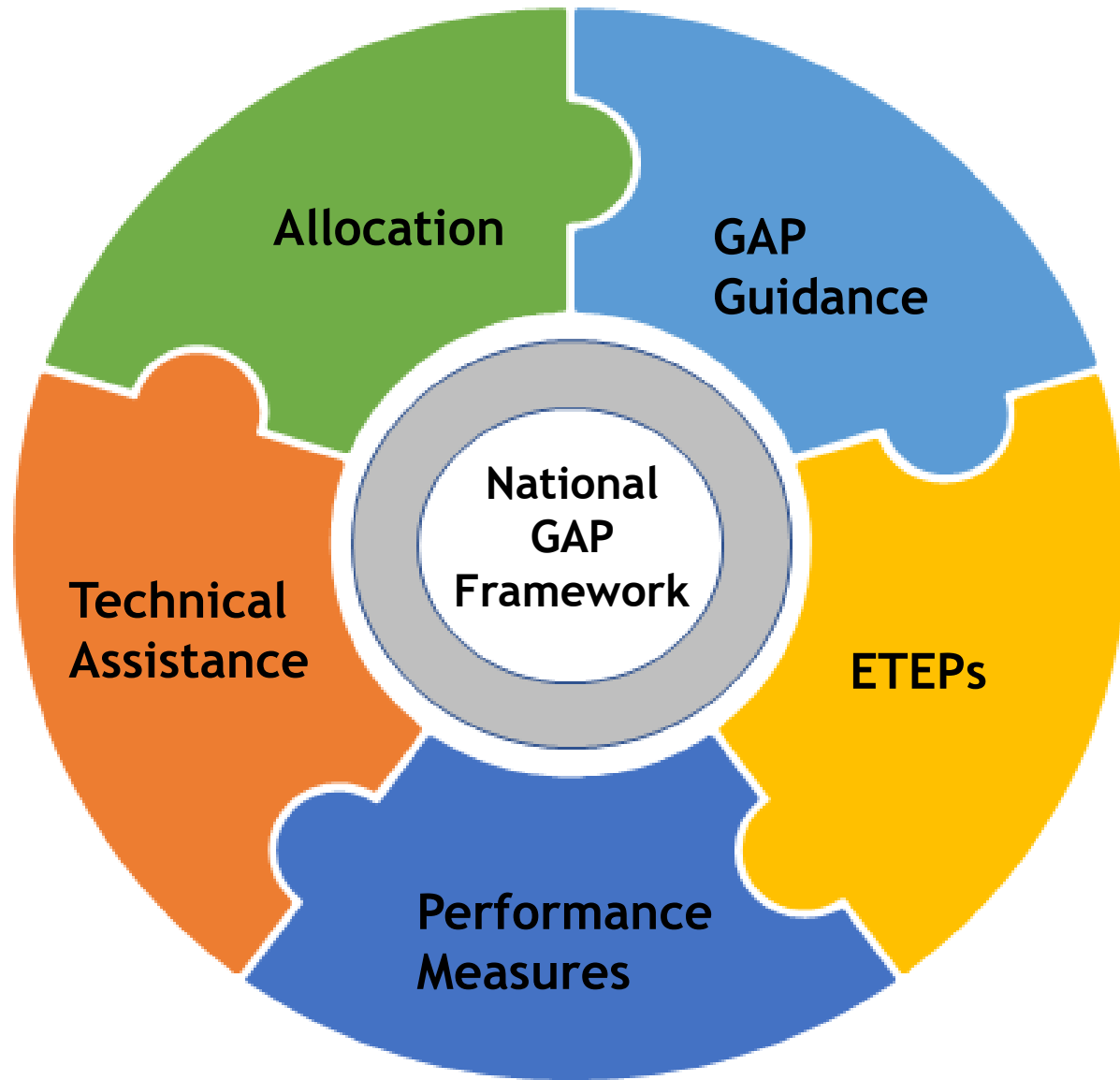
- ▶ EPA and Tribes work collaboratively on revisions, leading to efficient, effective, and flexible administration of GAP
- ▶ Revision will be led by AIEO, with clear guidance on AIEO decisions (“bright lines”)

▶ Timeline

- ▶ Starts now
- ▶ New Workgroups July 2021 - October 2021
- ▶ Tribal Consultation - December 2021 - February 2022
- ▶ Final Revised Guidance - March 2022
- ▶ Training - April 2022 - September 2022
- ▶ Implementation - October 1, 2022

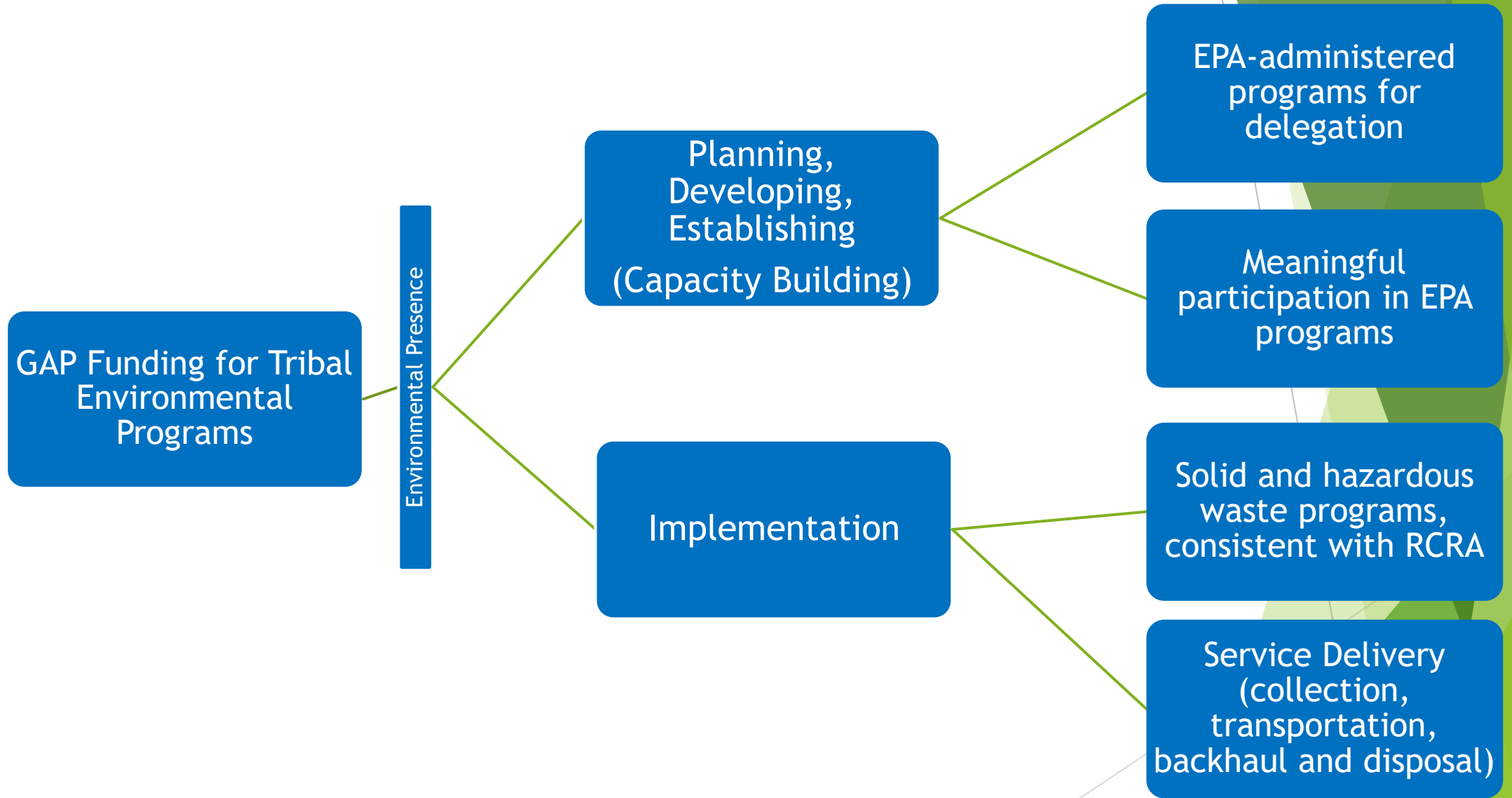
Workgroups in Phase 2 - GAP Revisions

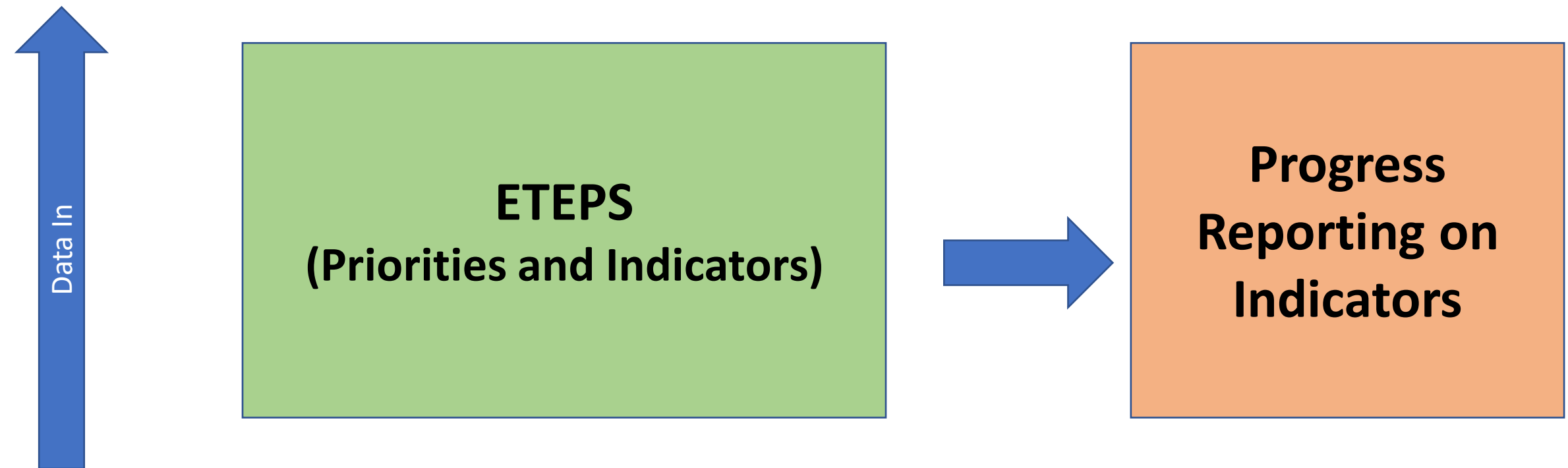
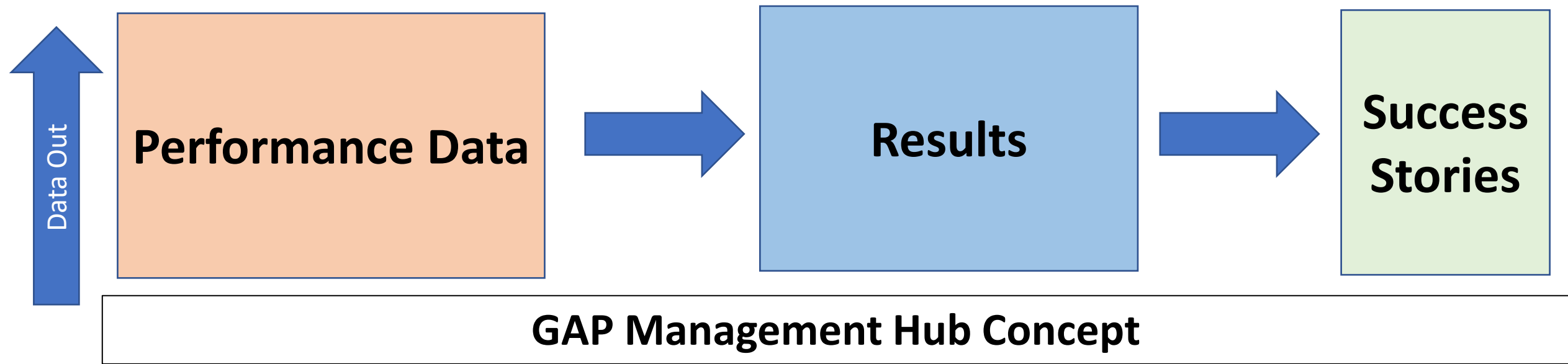
- ▶ **GAP Revision Workgroups for Tribal Participation**
 - ▶ GAP Structure - tone and layout
 - ▶ Test Drives - parameters of a test drive
 - ▶ PPGs - better incorporation PPGs in the Guidance
 - ▶ Technical assistance - technical assistance resources for capacity building
 - ▶ GAP Hub - ETEPs and Performance Management
- ▶ **Ways to participate**
 - ▶ Volunteer to be on a workgroup
 - ▶ Coordinate with workgroup representatives
 - ▶ Submit photos, tribal case studies
 - ▶ Other ideas may be forthcoming!



▶ National GAP Framework

- ▶ GAP Guidance
- ▶ ETEPs
- ▶ Performance Measures
- ▶ Technical Assistance
- ▶ Allocation





What is next?

- ▶ **If you are interested in a workgroup, let me know (berrios.lisa@epa.gov)**
 - ▶ Looking for diversity of experience
 - ▶ Looking for geographic diversity
 - ▶ 3 EPA reps + 3 tribal reps per workgroup (includes National Tribal Caucus representative)
 - ▶ Requesting volunteer interest by July 16, 2021
 - ▶ What workgroup are you interested in? (up to 3 options in order of preference)
 - ▶ Brief summary as to your experience/why this workgroup interests you
 - ▶ What Tribe do you represent?
 - ▶ How can we reach you?
- ▶ **Plan to have workgroups established by mid-July**
 - ▶ You will hear back from AIEO shortly after July 16

Consultation - GAP Allocation

- ▶ **AIEO Priority - National Allocation**
 - ▶ Are we addressing the high priority needs in Indian country?
 - ▶ Office of Inspector General (OIG) recommendations from 2008
- ▶ **July 19 - November 16, 2021**
 - ▶ Informational call - August 2021
 - ▶ Regional consultation webinars
 - ▶ Consortia webinar
 - ▶ Regional Tribal Operations Committee (RTOC) and Tribal Partnership Group (TPG) discussions
 - ▶ Will accept individual requests for Consultation
 - ▶ In-person Consultation not yet possible

GAP Allocation

- ▶ **What is the existing national GAP allocation process?**
 - ▶ AIEO receives the appropriation from Congress
 - ▶ National AIEO set-asides, if any, determined and reserved
 - ▶ Allocations to regions are determined as $\$110,000 \times \#$ of federally regulated tribes in region
 - ▶ Remaining balance is divided equally by $\#$ of GAP recipients and added to regional allocation

GAP Allocation

- ▶ **For FY21**
 - ▶ \$66,250,000 GAP Appropriation
 - ▶ Minus AIEO set-aside of \$250,000 (Indian Health Service Interagency Agreement) = \$66,000,000
 - ▶ \$66,000,000 minus (583 tribes x \$110,000/per tribe) = \$1,870,000
 - ▶ \$1,870,000/513 GAP recipients = \$3,645.22/recipient
- ▶ **Regions distribute the funds based on regional specific criteria**
- ▶ **EPA staff are not paid by GAP**

	FY 2021 Total
Region 1	\$1,129,000
Region 2	\$909,000
Region 3	\$678,000
Region 4	\$682,000
Region 5	\$3,978,000
Region 6	\$7,501,000
Region 7	\$1,019,000
Region 8	\$3,175,000
Region 9	\$16,296,000
Region 10	\$30,633,000
HQ	\$250,000
Total	\$66,250,000

GGE Phase 2 Timeline - Big Picture

- ▶ **GAP Guidance Revisions (Workgroups) - July through October**
- ▶ **Allocation consultation - July through November**
- ▶ **Internal drafting of final revised Guidance and allocation - Nov/Dec**
- ▶ **Tribal consultation on final revised Guidance and allocation**
 - ▶ **December 2021 through February 2022**
- ▶ **Final Guidance and allocation issued - March 2022**
- ▶ **Training (internal, external) - April through September 2022**
- ▶ **Final Guidance and Allocation effective October 1, 2022**

Questions?

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