



U.S. ENVIRONMENTAL PROTECTION AGENCY – REGION 5

**STANDARD OPERATING PROCEDURE
FOR THE
COMMUNITY ACTION ROADMAP**

**R5 TRIBAL AND MULTI-MEDIA PROGRAM OFFICE’S
ENVIRONMENTAL JUSTICE PROGRAM**

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REVISION HISTORY

The table below identifies changes to this document and the respective effective date(s) over time.

Revision Number	Date	Editor Name	Revision Description

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ACRONYMS:

ECR	External Civil Rights
EJ	Environmental Justice
E.O.	Executive Order
CAR	Community Action Roadmap
CAP	Community Action Plan
CBO	Community Based Organization
CPS	Collaborative Problem-Solving
FY	Fiscal Year
OEJECR	Office of Environmental Justice and External Civil Rights
OIG	Office of Inspector General
SOP	Standard Operating Procedure
SOPHIA	Society of Practitioners of Health Impact Assessment

1.0 PURPOSE

This standard operating procedure (SOP) provides EPA Region 5 personnel with a step-by-step process for applying the Community Action Roadmap (CAR) in order to advance environmental justice and equity. The CAR is a systematic collaborative approach to assess and address cumulative impacts. It establishes a place-based focus on the distribution and concentration of risks and other impacts, along with opportunities to invest in underserved and overburdened communities; builds in routine, authentic engagement with communities and their lived experience(s); and facilitates joint planning and coordination with governmental and non-governmental partners, with a bias for action.

This document is also intended to inform development of an SOP for a nationally consistent approach that enables the entire EJ program (regionally and nationally) to track work in real-time and optimize public health and environmental outcomes.

2.0 BACKGROUND

2.1. COMMUNITY ACTION ROADMAP AND EJ DOCKET SYSTEM

The CAR is comprised of a series of phases benchmarked to the Health Impact Assessment¹ model. These phases are tailored to support consistent, effective internal coordination of EPA’s cross-program, community-focused planning, along with meaningful community engagement at each phase. See Figure 1 below.

***NOTE:** Internal discussions will take place at each phase to ensure shared understanding when engaging with the community.*

Figure 1: Illustration of Community Action Roadmap Phases



¹ Society of Practitioners of Health Impact Assessment (SOPHIA). Minimum Elements and Practice Standards for Health Impact Assessment, Version 4. August 2022. <https://hiasociety.org/MEPS/>

Implementation of this SOP will be supported through a program management system currently under development: the “Region 5 Environmental Justice (EJ) Docket System.” This system will manage the EJ and Environmental Civil Rights (ECR) program’s docket of activities, which are generally community-focused, often involve multiple EPA programs, and require coordination with external government and non-government partners. It will:

- Record the concerns and issues raised by overburdened communities, thereby capturing and creating a quantitative and/or qualitative dataset.
- Illustrate regional EJ community engagement projects and activities to foster cross-program collaboration.
- Provide an aggregated subset of data for Screening and Scoping Phases of the CAR.
- Track community-focused commitments to assess concerns and take action that make up a Community Action Plan (CAP).² This provides accountability and transparency for all EPA programs; and facilitates shared management of cross-program, community-focused EJ/equity work.
- Track short-term and long-term outputs and outcomes of action to improve environmental and public health conditions in communities.
- Track and manage progress of quarterly and annual activities included in Goal 2 of EPA’s Fiscal Year (FY) 2022-2026 Strategic Plan.³
- Manage community contacts to support consultation and engagement; with the ability to track, manage, analyze, and report place-based and interest-based partner interaction data.
- Improve the line-of-sight across the agency’s EJ work, aiding in the development of holistic and collaborative strategies across EPA programs to strengthen the capacity of communities facing cumulative impact concerns.

Figure 2 below identifies all the components of the EJ Docket System under development. Further details and guidance will be drafted regarding the operation of this system as it pertains to the CAR process. Region 5 is working with Office of Environmental Justice and External Civil Rights (OEJECR) and other Regions on a national approach to building and implementing an EJ Docket System. A national approach will enable the national program to establish baselines, plan future work, document successes, invest in challenges and track trends in EJ and vulnerable communities in a transparent and efficient way. The systems will be populated by front-line users to support their cross-program EJ and ECR work. Because the systems will be directly used to manage our “docket” of EJ/ECR work, they will provide timely and accurate data while minimizing reporting burdens.

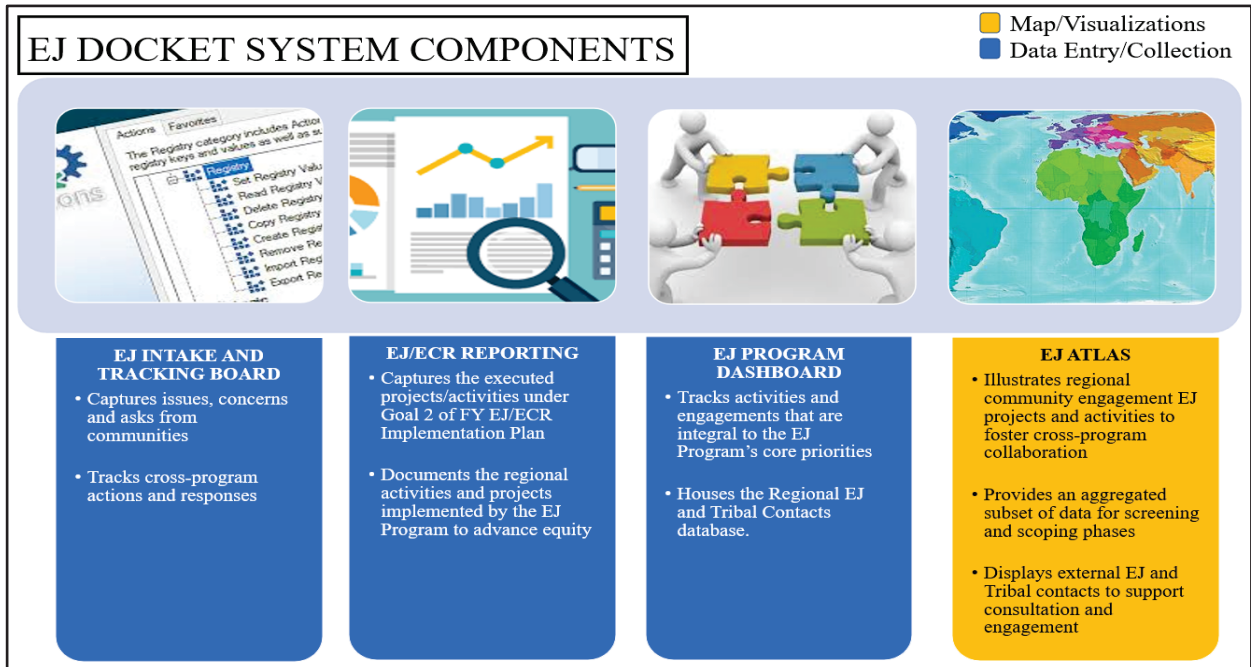
Until the EJ Docket System is ready for use, the CAR can be supported through Microsoft Office applications – Word and Excel. Furthermore, this work can occur at many different scales, with a variety

² The CAP is an output of the CAR; and may take different forms depending on what is “fit for purpose” in each case. For internal purposes, we track the full set of specific commitments in identified communities through the EJ Docket. We can use data from this system to support internal performance measures (from section-level ‘bowling charts’ on up), as well as to support reporting and monitoring that matters to our external partners. In some cases, external partners may be the primary authors of a CAP (or its functional equivalent); in other cases, EPA (and/or sister agencies) may be the main author as a convener of the collaborative problem-solving process.

³ See EPA’s FY 2022-2026 Strategic Plan, available at www.epa.gov/system/files/documents/2022-03/fy-2022-2026-epa-strategic-plan.pdf, page 26.

of partners and communities, so any application of the CAR should be “fit for purpose” and can expand beyond the steps denoted in this document, as appropriate.

Figure 2: EJ Docket System Components



2.2. POLICY REQUIREMENTS AND EPA COMMITMENTS

Establishing this SOP demonstrates and supports progress towards many of the national goals established by E.O., EPA’s Strategic Plan, Executive Orders, and the August 2023 Office of Inspector General (OIG) Report.

EPA’s FY 22-26 Strategic Plan includes an Agency priority goal for FY 22-23 to deliver tools and metrics for EPA and its Tribal, state, local, and community partners to advance EJ and external civil rights compliance. Specifically, by September 30, 2023, EPA committed to the development and implementation of a cumulative impacts framework.

Executive Order (E.O.) 12898⁴ requires federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations to the greatest extent practicable and permitted by law, develop a strategy for implementing EJ, promote nondiscrimination in federal programs that affect human health and the environment, and provide minority and low-income communities access to public information and public participation.

⁴ Feb 11, 1994 - Federal actions to address environmental justice in minority populations and low-income populations. See <https://www.epa.gov/environmentaljustice/federal-actions-address-environmental-justice-minority-populations-and-low>.

E.O. 13985⁵ addresses disparities in the United States’ laws and public policies, some of which having denied equal opportunities where economic, health, and climate crises have been exacerbated, and identifies that advancing EJ is the responsibility of the government to redress policies and programs. Although E.O. 13985 does not specifically mention cumulative impacts, the EPA’s E.O. 13985 Equity Action Plan implements this executive order through the development of a cumulative impacts framework, which is outlined in the FY 2022-2026 EPA Strategic Plan. The Equity Action Plan identifies six priority actions that align with the FY 2022–2026 EPA Strategic Plan. These six priority actions form a foundation on which to build meaningful engagement with underserved communities to achieve more equitable and just outcomes, including pollution reductions in communities with EJ concerns, and other tangible benefits to underserved communities.

Executive Order 14008⁶ modified the White House Environmental Justice Interagency Council, ordering the development of a strategy to address current and historic environmental injustices by consulting with the White House Environmental Justice Advisory Council and local environmental EJ leaders to develop clear performance metrics to ensure accountability, as well as to publish an annual public performance scorecard on its implementation. The new executive order requires EPA to build upon and strengthen its commitment to deliver EJ to all communities through an approach that is informed by scientific research, high-quality data, and meaningful Federal community engagement. This commitment can be achieved by developing programs, policies, and activities to address the disproportionately high and adverse human health, environmental, climate-related, and other cumulative impacts on disadvantaged communities.

Executive Order 14096⁷ requires EPA and other federal agencies to “identify, analyze, and address disproportionate and adverse human health and environmental effects” including “cumulative impacts of environmental and other burdens on communities with environmental justice concerns” for both Federal and non-Federal activities “as appropriate and consistent with applicable law.”

The August 2023 OIG Report, “The EPA Lacks Agencywide Policies and Guidance to Address Cumulative Impacts and Disproportionate Health Effects on Communities with Environmental Justice Concerns”⁸ found that overall, EPA has not established performance measures related to identifying and addressing cumulative impacts and disproportionate health effects across programs. Developing and implementing such policies, guidance, and performance measures will allow the EPA to consistently identify and address disproportionate health effects, which is critical to advancing environmental and public health outcomes in all communities. The report makes the following recommendations to the EPA Deputy Administrator:

⁵ Jan 20, 2021 - Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. See <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>.

⁶ January 27, 2021 - Tackling the Climate Crisis at Home and Abroad. See <https://www.federalregister.gov/documents/2021/02/01/2021-02177/tackling-the-climate-crisis-at-home-and-abroad>.

⁷ April 21, 2023 - Revitalizing Our Nation's Commitment to Environmental Justice for All. See <https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all>.

⁸ U.S. EPA Office of Inspector General Report. See <https://www.epaoig.gov/reports/audit/epa-needs-further-refine-and-implement-guidance-address-cumulative-impacts-and>.

1. Develop and implement policies and guidance to increase and improve coordination between EPA programs to assess and address cumulative impacts and disproportionate health effects.
2. Develop and implement performance measures to monitor progress in identifying and addressing cumulative impacts and disproportionate health effects across EPA programs.

In response, OEJECR committed to establish a cumulative impacts working group which, among other things, will “promote collaboration and coordination by developing policies, procedures and practices, as appropriate, to improve coordination and consistency across programs.” EPA’s response⁹ also notes:

“Measurable steps in the Agency Equity Plan include forming a team of EPA staff with appropriate expertise to implement cumulative impacts analysis to address cumulative impacts, developing a draft framework, piloting case studies, and beginning to operationalize the framework. Longer-term EPA commitments include building consideration of cumulative impacts into more decisions, including permitting decisions, continuing to refine analytic techniques based on best available science, increasing the body of relevant data and knowledge, and using outcome-based metrics to measure progress, including quantifiable pollution reduction benefits in communities that result from decisions that factor in cumulative impacts.”

⁹ See Appendix B of “*The EPA Needs to Further Refine and Implement Guidance to Address Cumulative Impacts and Disproportionate Health Effects Across Environmental Programs*”, <https://www.epa.gov/reports/audit/epa-needs-further-refine-and-implement-guidance-address-cumulative-impacts-and>.

3.0 COMMUNITY ACTION ROADMAP PHASES

3.1. PHASE 1 – SCREENING

PURPOSE: “ARE THERE CONCERNS?” – This phase is meant to evaluate concerns brought forward by a community or EPA as a starting point for further consideration. The screening phase should prioritize attention to the people and places where action is most needed to address disproportionate and cumulative impacts (EJ/equity concerns) and to invest in thriving and resilience (EJ/equity opportunities). These areas could be identified by issues raised to the EJ Program at community engagement events, referrals to the EJ Program from internal EPA program offices, or through EJScreen analyses.

LEAD PROGRAM OFFICE: EJ Program

SCREENING STEPS:

(A) Consider information from both community and agency sources when conducting a screening analysis for an area.

Community Initiated – issues identified by residents or community advocates via engagement. Is the area:

- one where community members or advocates have identified EJ concerns?
- one where the identified EJ concerns may require cross-program, community-focused action?

Agency Initiated – areas identified by the EJ Program for further analysis. Is the area:

- at or above the 80th percentile in EJScreen EJ indices (including supplemental indices), health disparities, and critical service data compared to state/Region/nation? Is the demographic index and/or supplemental index above the national average?
- do other screening systems or readily available data indicate a significant potential for disproportionate and/or cumulative impacts?

NOTE: *If the answer to any of these is “yes,” this place meets screening criteria and is a candidate for scoping. There may be instances where concerns are raised in an area that do not meet the criteria set forth by various screening tools.*

(B) Determine whether to propose a place for scoping.

Screening will identify a larger “universe” of places than can be moved to scoping at any given time. For places proposed for scoping and further action, a preliminary evaluation will document the extent of community concerns as well as how significant the potential for disproportionate and cumulative impacts is. This preliminary evaluation will be provided to relevant program offices for review, to support discussion and collaboration on appropriate next steps.

SCREENING TOOLS TO UTILIZE

[EJScreen](#) is an EPA's EJ mapping and screening tool that provides EPA with a nationally consistent dataset and approach for combining environmental and demographic socioeconomic indicators. EJScreen users choose a geographic area; the tool then provides demographic, socioeconomic, and environmental information for that area. All the EJScreen indicators are publicly available data. EJScreen provides a simple way to display this information and includes a method for combining environmental and demographic indicators into EJ indexes.

[EnviroAtlas](#) is part of an ongoing commitment to sustainable and healthy communities as well as safe and sustainable water resources. EnviroAtlas was developed collaboratively by EPA in partnership with the U.S. Geological Survey (USGS), the U.S. Department of Agriculture (USDA), and other federal and non-profit organizations, universities, and communities including state, county, and city-level partners.

[ECHO](#) is EPA's Enforcement and Compliance History Online (ECHO) website to search for facilities in your community to assess their compliance with environmental regulations. You can use ECHO to search for facilities, investigate pollution sources, search for EPA enforcement cases, examine and create enforcement-related maps, and analyze trends in compliance & enforcement data.

[CDC's EJ Index \(EJI\)](#) uses data from the U.S. Census Bureau, U.S. EPA, the U.S. Mine Safety and Health Administration, and the U.S. Centers for Disease Control and Prevention (CDC) to rank the cumulative impacts of environmental injustice on health for every census tract. Census tracts are subdivisions of counties for which the Census collects statistical data. The EJI ranks each tract on 36 environmental, social, and health factors and groups them into three overarching modules and ten different domains.

The R5 EJ Atlas on the GIS platform incorporates several environmental and demographic datasets and provides a visual representation and summary of the EJ engagement/outreach activities conducted in the region. This pre-decisional tool will also better inform the targeting and planning for community engagement efforts with the layer-able datasets as well as a "Community Profile Report;" a PDF document with the compilation of the applicable disproportionate impact indicators for a user-specified area of concern. The main purpose of this report is to highlight concerns about cumulative impacts suffered by the communities in each specified area and emphasize the need for broader analyses.

Table 1: Summary of Phase 1 - Screening

SUMMARY OF PHASE 1 – SCREENING	
ACTION: Identify locations where an EPA cross-program and community-focused approach could address disproportionate and cumulative impacts.	OUTPUT: A draft preliminary evaluation of an area and a decision on when/how to proceed to the Scoping Phase.
<p>Document community concerns raised during community engagement events, public meetings, etc.</p> <ul style="list-style-type: none"> • Ask for any additional contacts in the community that could provide further input. • Ask for any quantitative or qualitative data they may have to share. <p>Document initial environmental and health data screening with initial environmental and health data screening, including:</p> <ul style="list-style-type: none"> • EJScreen report • EnviroAtlas • ECHO • CDC EJ Index • EJ Atlas • Local public datasets • Others as needed 	

3.2. PHASE 2 – SCOPING

PURPOSE: “**CHARACTERIZE CONCERNS/RESOURCES**” – Identify a set of concerns and needs (i.e., potential disproportionate and cumulative impacts), including potential opportunities for investment, to assess and address in the selected area. Include appropriate engagement by EPA programs, partners, and community leaders, where applicable.

COORDINATION ROLES: The EJ Program will identify the initial set of concerns, based on its preliminary evaluation at the Screening phase. Other programs will be engaged to help evaluate the initial set of concerns, and to identify additional program-specific concerns. With EJ program facilitation, Region 5 programs will work together to carry out the scoping phase.

SCOPING STEPS:

- The EJ Program will summarize known concerns and needs. For each, the following will be identified:
 - Source – where the concern/need originated.
 - Which program/partner(s) should be involved in evaluating the concern/need identified and how to address it, based on expertise and ability? Are there any other outstanding environmental issues?¹⁰ Is there ongoing EPA community engagement work in the area?
- The EJ Program will engage relevant EPA programs to ensure shared understanding of concerns/needs (see a menu of EJ approaches in EPA programs in the [Appendix](#)) and will work with EPA program contacts to establish coordination roles with potential external partners in

¹⁰ Much of this information is readily available. An important part of building out this SOP is to have effective and systematic ways of taking that information on board during the scoping phase.

assessing and responding to each specific concern in an area. The EJ Program and other relevant EPA programs should consider the following questions:

- Have concerns/needs been reviewed by potentially relevant EPA programs and partners (e. g. has there already been work done towards this concern? What does the relevant EPA program office already know?)?
- Are there additional concerns/needs that should be added?
- Should certain concerns/needs not be carried forward? If not, why (e.g., lack of authority; lack of resources)?
- Has the initial set of concerns/needs been shared with community partners to ensure accuracy?
- Have community members/leaders been invited to collaborate in this and further phases?
- The EJ Program will work with other relevant program offices to establish an Assessment Workplan that includes:
 - A summary of existing (baseline) conditions to provide overall context for specific decisions, including:
 - Historical context including past EPA actions [*both EJ and Program offices provide this information*]
 - Demographics
 - Existing environmental and health conditions, and how they are distributed and concentrated.
 - Identifying additional data collection needed (e.g., are there State or local data resources that better characterize the issues?) [*both EJ and Program offices provide, depending on potential program actions*]
 - Identifying any further assessments needed to support decisions and action in response to specific concerns/needs [*both EJ and Program offices provide, depending on potential program actions*]. For each concern/need, possible decisions are:
 - Is further assessment needed before relevant decisionmakers can determine appropriate action(s) in response to the concern/need? If so, the Assessment Workplan should include descriptions of additional analysis needed, the expected timeframe for completion, and required collaborators.
 - If no further assessment is needed, proceed with to the next steps because sufficient information to recommend next steps is already available.
 - An Assessment Workplan table with the fields shown in Table 2 will be filled in by the EJ program and housed in a designated SharePoint folder for shared input from relevant EPA programs to document decisions and next steps.

Table 2: Example of an Assessment Workplan

Action Identifier	Concern(s)/Need(s)	Source	Programs Engaged ^(a)	Potential Partners	Further Analysis Needed (Y/N)	Further Analysis	Estimated Timeframe for Completing Additional Analysis
Ex: 1	Flooding and Sewer Infrastructure Concerns	Citizen for Action Community Group	EJ Program and FEMA with local community groups for prioritizing infrastructure grant funding	Local CBO, TMPO, FEMA	Y	Timeline of infrastructure improvements	6 months

^(a)EPA Programs who will assess the concern/need & decide on next steps following assessment.

- The EJ Program, with other relevant program offices and external partners, will establish a Collaboration and Engagement Strategy (see the Collaboration and Engagement Strategy Example in the [Appendix](#)) that considers:
 - Which EPA programs are engaged with a point of contact designated by each program office?
 - Based on issues and concerns identified, a subject matter expert from the applicable program(s) will be assigned by Program Management to provide program-specific perspectives.
 - These experts can help determine which workplan elements may need to remain confidential due to their sensitive nature, when applicable.
 - Once a strategy is in place, how the collaborators will discuss the timeframe to respond to concerns/needs listed in the assessment plan and how updates will be communicated with internal and external partners.
 - What partners, including community leaders and advocates, state and local government, and other federal entities, are engaged or will be engaged.
 - How broader community engagement will be conducted during subsequent phases (e.g., when a need for engagement is identified, how will it be best executed to reach that community?)

Table 3: Summary of Phase 2 - Scoping

SUMMARY OF PHASE 2 – SCOPING	
<p>ACTION: (1) Engage all relevant internal & external partners to develop plans for further assessment</p> <p>(2) Consider what outcomes could be achieved.</p> <p>(3) Establish a Collaboration and Engagement Strategy with partners.</p>	<p>OUTPUTS: An Assessment Workplan and a Collaboration and Engagement Strategy.</p>
<p>Meet internally with relevant programs to discuss and evaluate the concerns/issues raised.</p> <ul style="list-style-type: none"> • Make sure the geographical scope is comprehensive (city-level, county-level, suburbs, etc.) • Assess data gaps (e.g., what data is missing on a granular level) <ul style="list-style-type: none"> ○ What EPA programs can help? Each program office should identify the main point of contact for coordination on issues raised (e.g., program staff or program manager). <ul style="list-style-type: none"> ▪ What workplan elements are sensitive and may need to remain confidential? ○ Who are the potential external partners? ○ Are there any civil rights issues?¹¹ • Determine if there are concerns that need to be further assessed (e.g., is there city level health data related to lung cancer/asthma rates?) • Share your draft Assessment Workplan with the community leaders or advocates to ensure EPA has accurately captured their concerns, considering the prompts above. <p><i>NOTE: The scoping and assessment phases are iterative and may involve a cyclical process of reassessing and re-establishing concerns and actions needed</i></p>	

3.3. PHASE 3 – ASSESSMENT

PURPOSE: “EXECUTE THE ASSESSMENT WORKPLAN” Conduct any additional analyses to capture a holistic understanding of the concerns/needs and use the results to update the Assessment Workplan and fill in knowledge gaps. Use the Collaboration and Engagement Strategy to further characterize and communicate concerns about disproportionate and cumulative impacts, based on the available evidence.

COORDINATION ROLES: The EJ Program and applicable program offices will perform analyses identified in the Assessment Workplan and engage relevant external partners for data needs.

ASSESSMENT STEPS

- Execute the Assessment Workplan and Collaboration and Engagement Strategy to perform further assessments needed.
- For “baseline conditions” assessments:
 - Evaluate existing internal or external data, gather qualitative and/or quantitative data from community residents or advocates, and consider next steps.
 - Have health assessments been conducted for this community previously? For example, local health department studies on blood lead levels of children in a community.
- Update or add new Assessment Workplan elements based on results and any potential next steps.

¹¹ Any civil rights issues raised will require close coordination with the Office of Regional Council.

- Are there any changes to the original scope of an issue or concern? Is there a need for additional analyses based on the results of executing the Assessment Workplan?

Table 4: Summary of Phase 3 - Assessment

SUMMARY OF PHASE 3 – ASSESSMENT	
<p>ACTION: (1) Execute Assessment Workplan with partners. (2) Identify if additional assessments are needed. (3) Update Assessment Workplan with additional issues/concerns identified, if applicable.</p>	<p>OUTPUT: A collaboratively approved cumulative assessment of existing conditions to inform next steps and recommendations.</p>
<p>To address community concerns – talk internally with applicable programs and then with community partners to ensure that the Assessment Workplan accurately conveys existing conditions and potential impacts of different actions.</p> <ul style="list-style-type: none"> ○ Is additional data needed to better understand cumulative impacts to community (e.g. health data (e.g., CDC data), TRI data, historical barriers, etc.)? ○ Update the Assessment Workplan, as needed. <p><i>NOTE: The scoping and assessment phases are iterative and may involve a cyclical process of reassessing and re-establishing concerns and actions needed.</i></p>	

3.4. PHASE 4 – DECISIONS AND ACTIONS

PURPOSE: “IDENTIFY AND EXECUTE POTENTIAL SOLUTIONS” – Identify and take actions with internal and external partners, as practicable. These actions should manage or prevent adverse environmental, health, and equity impacts, deliver community benefits, and address concerns based on the available evidence.

COORDINATION ROLES: Utilize the Collaboration and Engagement Strategy to coordinate activities and events with the community.

DECISIONS AND ACTIONS STEPS: For each need/concern:

- Where no further assessment was needed:
 - Recommend actions to address the need/concern based on available information.
 - Establish EPA program commitments to take recommended actions.
 - Share and discuss assessment results, recommendations, and commitments with internal, external and community partners to confirm and commit to actions.
- Where further assessment was carried out under the Assessment Workplan:
 - Document findings and recommend actions to address the need/concern based on these findings.
 - Establish EPA program commitments to take recommended actions.
 - Share and discuss assessment results, recommendations, and commitments with internal, external and community partners to confirm and commit to actions.
- An “Action Item” table (see Table 5 below) with the following fields should be created to document decisions, support communication, and determine whether additional assessment is needed to support actions on one or more of the concerns/needs identified. This table will be housed in a designated SharePoint folder for shared input and tracking.

NOTE: *The Collaboration and Engagement Strategy should be revisited to ensure that the roles and responsibilities are up-to-date and applicable to the actions noted in the Action Table.*

Table 5: Proposed Action Items

Action Identifier	Concern(s)/Need(s)	Key Findings ^(a)	Recommended Actions	Program and/or partner commitments ^(b)	Estimated Timeframe for Executing Actions
Ex. 1	Facility with odor complaints	Elevated fugitive emissions	Proceed with facility inspection	ECAD and State agency enforcement collaboration	6 months
Ex. 2	Pb-based paint exposure awareness and education	Soil is another major source of Pb exposure	Hold several educational events focused on local Pb sources and ways to reduce exposure.	TMPO, LCRD, CBO	3 months
			Hold Train-the-Trainer sessions for community leaders and advocates.	TMPO, LCRD, CBO, City, and State Health Departments	6 months

^(a) Key findings identified during the assessment phase or findings already known where no further assessment is needed.

^(b) Programs and partners engaged who will assist with assessing the concern/need and decide on next steps following assessment.

Table 6: Summary of Phase 4 - Decisions and Actions

SUMMARY OF PHASE 4 – DECISIONS AND ACTIONS	
<p>ACTION: (1) Collaboratively develop feasible, evidence-based, and prioritized actions that mitigate negative outcomes and/or improve conditions. (2) Define partner commitments to take relevant recommended actions</p>	<p>OUTPUT: A set of recommended actions that are endorsed by internal and external partners.</p>
<p>Share and discuss assessment results, recommendations, and commitments with the community (following the Collaboration and Engagement Strategy) and determine whether additional assessment is needed to support action on one or more of the concerns/needs identified.</p>	

3.5. PHASE 5 & 6 – REPORTING AND MONITORING

PURPOSE: “COMPILE AND EXECUTE THE CAP” – The Reporting and Monitoring Phases may be initiated simultaneously, so that any plans for tracking and sharing progress can be included in the CAP and may extend beyond the end of a CAP, agreed upon in the Management Strategy. The *Reporting Phase* documents and shares outcomes as well as findings and recommendations. The *Monitoring Phase* provides accountability for commitments made under a CAP, including tracking outcomes over time; opportunity for regular review and revision as needed; and fostering ongoing collaborative problem-solving partnerships.

COORDINATION ROLES: The EJ Program and assigned programmatic point of contacts/subject matter expert(s) will be responsible for assembling all the components of the CAP. Both internal and external partners will establish a Management Strategy and the EJ Program will track and report on program and partner commitments under each CAP. Other EPA programs and federal partners collaborating on the plan will review and provide content, where needed, based on relevant roles & expertise.

REPORTING STEPS:

- Culminate the preliminary evaluation, Assessment Workplan and findings, and recommendations into a document to create the draft CAP.
- Co-design a Management Strategy (See the Management Strategy Example in the [Appendix](#)) to ensure proper communication, coordination, and utilization of resources that considers:
 - How progress on executing the committed actions and how they will be evaluated and communicated to internal and external partners including timelines and point of contacts.
 - Have subject matter experts from applicable programs and assigned by program management changed since the original formation of the Action Table?
 - At what frequency will the CAP team report on the progress of action items listed in the Action Table?
 - Are there additional partners, including community leaders and advocates, state and local government, and other federal entities, that should be engaged due to changes in concerns, assessments, and/or action items?
 - How will future community engagement activities be conducted?
 - How will the executed actions build capacity and sustain beneficial community changes?
 - How will successful outcomes be tracked, compiled, and disseminated for continued progress on the CAP?
 - How will partnerships formed during this process be maintained and strengthened as actions are implemented?
- Share draft CAP with internal and external partners for feedback per the Collaboration and Engagement Strategy as well as the Management Strategy. Incorporate feedback and “finalize”¹² CAP.

¹² Most CAPs **may not** be final until after several iterations of the CAR process, as collaboration, engagement, and assessment may uncover other concerns/issues during the process. New concerns/needs would need to be addressed by implementing the CAR process and documented via an amendment to the original CAP.

Table 7: Summary of Phase 5 - Reporting

SUMMARY OF PHASE 5 – REPORTING	
<p>ACTION: (1) Develop a Management Strategy for executing, evaluating, and sustaining recommendations and relationships. (2) Compile and disseminate outputs from the Screening, Scoping, Assessment and Recommendation Phases.</p>	<p>OUTPUT: Provide updates to partners and the community using the Management Strategy.</p>
<p>Work collaboratively with the community and applicable EPA program offices to document results and monitor outputs and outcomes:</p> <ul style="list-style-type: none"> • Compile and review actions/outputs and outcomes to determine if environmental and health issues are addressed in an adequate and agreed upon timeframe. • Share summaries internally and externally to determine what may be working and what may need to be re-evaluated. 	

MONITORING STEPS:

- Implement the Management Strategy to track and report on the progress and completion of commitments made in the CAP.
 - Consider oral and written options: regularly scheduled check-in calls? Community-EPA reports, where status updates are provided by both parties? Semi-annual site visits?
- Evaluate the execution and implementation processes of the CAR and document best practices, shared by internal and external partners, as process improvement for future CAPs.
 - What changes are necessary to support continuous improvement? What were some lessons learned? What adjustments were made to fully engage with the community?

Table 8: Summary of Phase 6 - Monitoring

SUMMARY OF PHASE 6 – MONITORING	
<p>ACTION: (1) Execute an agreed upon process to track/report on the progress and completion of commitments made in the Community Action Plan (CAP). (2) Evaluate the execution and implementation processes and document lessons learned and best practices.</p>	<p>OUTPUT: Culminate feedback received from evaluation mechanisms to support the Community Action Roadmap process and incorporate into the CAP.</p>
<p>Work collaboratively with the community and applicable EPA program offices to document results and monitor outputs and outcomes:</p> <ul style="list-style-type: none"> • Are commitments being met? • How are environmental and public health conditions changing as a result? • Consider evaluating the CAP implementation process. 	

4.0 REFERENCES

- ❖ EPA's Community Action Roadmap
- ❖ EPA's FY 2022-2026 Strategic Plan, page 26. (www.epa.gov/system/files/documents/2022-03/fy-2022-2026-epa-strategic-plan.pdf).
- ❖ EPA's Environmental Justice Collaborative Problem-Solving Model. EPA-300-R-06-002. June 2008. (<https://www.epa.gov/system/files/documents/2021-12/ejcps-model-guide.pdf>)
- ❖ Society of Practitioners of Health Impact Assessment (SOPHIA), Minimum Elements and Practice Standards for Health Impact Assessment, Version 4. August 2022. (<https://hiasociety.org/MEPS/>)
- ❖ Protocol for Assessing Community Excellence in Environmental Health (PACE EH): A Guidebook for Local Health Officials. May 2000. (<https://www.cdc.gov/nceh/ehs/docs/pace-eh-guidebook.pdf>)
- ❖ Feb 11, 1994 – Federal actions to address environmental justice in minority populations and low-income populations. (<https://www.epa.gov/environmentaljustice/federal-actions-address-environmental-justice-minority-populations-and-low>).
- ❖ Jan 20, 2021 – Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. (<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>).
- ❖ January 27, 2021 – Tackling the Climate Crisis at Home and Abroad. (<https://www.federalregister.gov/documents/2021/02/01/2021-02177/tackling-the-climate-crisis-at-home-and-abroad>).
- ❖ April 21, 2023 – Revitalizing Our Nation's Commitment to Environmental Justice for All. (<https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all>).
- ❖ U.S. EPA Office of Inspector General Report. (<https://www.epaoig.gov/reports/audit/epa-needs-further-refine-and-implement-guidance-address-cumulative-impacts-and>).

5.0 APPENDIX

5.1. EXAMPLES OF COMMUNITY ACTION PLAN ELEMENTS

❖ Preliminary Evaluation Example

DRAFT: 6-29-2023

**COMMUNITY ACTION PLAN
FOR
CUYAHOGA COUNTY, OH**

PURPOSE: This Draft is intended to start a conversation about working together (along with other partners to be identified) to address community priorities and concerns. U.S. EPA has provided context based on our current knowledge and understanding, as a starting point for that dialogue.

This Community Action Plan aims to (a) identify the needs and concerns of these communities through collaborative engagement with the community, community-based organizations, State and Local governments; (b) identify actions that will address cumulative and disproportionate impacts while building sustainable capacity to advance environmental justice and equity.

SCREENING & SCOPING: A preliminary evaluation of the nature and extent of disproportionate and cumulative impacts within the community, to identify areas where action can be taken to address impacts.

Communities in Cuyahoga County have raised concerns about disproportionate impacts resulting from racial, economic, and environmental disparities and social injustices related to education, employment, housing, and human health.

Areas of concern to evaluate and address through this action plan will be determined through discussion with community leaders and partners. This draft starts with the following concerns that have been identified by community leaders:

- Lead Hazards and Exposure and Miscoordination of State and Local Governments
- Black Maternal Health and Mortality
- Air Quality Issues and Asthma Prevalence

Lead Hazards and Exposure and Miscoordination of Local Government:

Lead is a naturally occurring element found in small amounts in the earth's crust and while it has some beneficial uses, it is also a neurotoxin linked to developmental, mental, and physical impairment, and young children are especially vulnerable health effects. According to the Cleveland Clinic, the city of Cleveland has rates of lead poisoning that are almost four times the national average and children living in Cuyahoga County are considered to be at the highest risk for lead exposure. In 2012, a study conducted by JAMA Pediatrics concluded that children in Ohio have levels of lead in their blood more than twice the national rate, see Figure 1 below. Lead exposure has serious consequences for adults such as high blood pressure and brain, kidney, and reproductive health issues, but it can have incredibly severe effects on a child's health. Children are particularly vulnerable to lead poisoning because they absorb 4-5 times as much ingested lead as adults from a given source. Even at lower levels of exposure that cause no obvious symptoms, lead can affect children's brain development, resulting in reduced intelligence quotient (IQ), behavioral changes such as reduced attention span and increased antisocial behavior, and reduced educational attainment. Undernourished children are more susceptible to lead because their bodies absorb more lead if other nutrients, such as calcium or iron, are lacking, so those residing in areas with Food Deserts may be impacted significantly (see Figure 2). Furthermore, lead exposure causes anemia, hypertension, renal impairment, immunotoxicity and toxicity to the reproductive organs. These neurological and behavioral effects of lead are irreversible, so prevention is the only effective approach.

1

DRAFT: 6-29-2023

Figure 1: Percentage of children with elevated blood lead levels. Analysis limited to states and the District of Columbia with results for more than 500 children. (Source: JAMA Pediatrics.)

2

DRAFT: 6-29-2023

Figure 3: Properties in Cuyahoga County with Notices of Non-Compliance Orders to Vacate for Lead Hazards. (Source: Ohio Public Health Information Warehouse)

Over the last decade, there have been several attempts to remediate lead exposure for Cleveland residents:

- 2012 – the Cleveland Department of Public Health failed to retain a federal grant, from the Department of Housing and Urban Development, that was intended to assist with lead source removal.
- 2016 – there were reports of at least 300 properties that housed severe lead exposure problems requiring evacuation, but these reports remained unaddressed or were not addressed appropriately.
- 2019 – the City Council passed an ordinance aimed at addressing the City's long-standing issues surrounding the presence of lead. However, the enforcement of this ordinance and ensuring that each neighborhood meets its lead certification deadline remains an issue.

Black Maternal Health and Mortality:

According to the 2015 Ohio Commission on Minority Health's Infant Mortality White Paper, Ohio's infant mortality disparities are among the worst in the nation. Infant mortality is defined as the death of any live-born baby prior to his or her first birthday. National and state public health data reveal that the infant mortality rate for Black/African Americans babies is twice the rate of White/Caucasian and Ohio ranks 45th in Infant Mortality among all racial and ethnic groups. Figure 6 shows the Quarterly Infant

3

DRAFT: 6-29-2023

Figure 2: EJScreen: Food Deserts and Medically Underserved Areas in Cuyahoga County

4

DRAFT: 6-29-2023

Figure 4: Quarterly Infant Mortality Scorecard for 10/1/2019 – 6/30/2021 by 12-month moving averages. (Source: Ohio Department of Health, Bureau of Vital Statistics birth, mortality, and fetal death files)

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DRAFT: 6-29-2023

Air Quality and Asthma:

A report from the Asthma and Allergy Foundation of America describes Cleveland as one of the most challenging cities in the country for those suffering from asthma. Asthma is a serious, sometimes life-threatening chronic respiratory disease that affects the quality of life for more than 25 million Americans, including an estimated 4 million children. Air quality is one of the largest factors contributing to asthma attacks and complications for other respiratory illnesses. Asthma typically first develops during childhood and continues into adulthood. According to data from the University of Richmond and the Centers for

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❖ Assessment Workplan Table Example

DRAFT: 10-16-23

ASSESSMENT WORK PLAN

Concern	Programs Engaged	Potential Partners	Assessment Needed	Estimated Time Frame
Reduce childhood exposure to lead	LCRD Lead Program; SEMD	PEHSU, HUD, IDEM, E Chicago Department of Health, CDC	Locate existing data, studies on: <ul style="list-style-type: none"> Morbidity rate from lead exposure in children Long-term potentially correlated health effects of lead on residents of W Calumet Housing Complex Blood lead levels (ug) in children in the last 3 years 	2 months (data collection/analysis from past/present testing)
Ambient air pollution and elevated cancer risks	AIR DIVISION, AIR PROGRAMS BRANCH	IDEM, City of East Chicago Health Department, CDC	City level data: Need city specific data as most of the CDC data is from a county level- as the majority of the county is NOT low income and/or people of color, county level data skews accuracy in determining cumulative and disproportionate impacts. <ul style="list-style-type: none"> Lung cancer rates Morbidity from lung cancer rates 	TBD
[address] High levels of asthma	ASTHMA: ARD-CASS Indoor Air	PEHSU, City of East Chicago Health Department, CDC	City level data: <ul style="list-style-type: none"> Asthma rates in children ages 5-10 [arbitrary age- PEHSU to determine] 	TBD

❖ Collaboration and Engagement Strategy Example

COLLABORATION AND ENGAGEMENT STRATEGY

PURPOSE: This document is intended as a guide for establishing a Collaboration and Engagement Strategy, as discussed in the Scoping Phase of the Community Action Roadmap (CAR) and its SOP. Collaboration and Engagement Strategy should be used to organize multiple partners, discuss the capacity and roles and responsibilities of each a partner, timelines for completing assessments, and information needed for next steps. This strategy will highlight resources needed to educate the team on issues/concerns to ensure a robust understanding of community's articulated vision, goals, history, and practices, while building trust with local and community-based partners.

❖ Collaboration and Engagement Strategy Team

INTERNAL PARTNERS			
EPA Program/Office	Name of Contact	Phone	Email
EJ Program	Alan Collaborator	312-XXX-XXXX	x.collaborator@epa.gov
LCRD	Joe Collaborator	312-XXX-XXXX	y.collaborator@epa.gov
FEMA	Anne Collaborator	312-XXX-XXXX	z.collaborator@epa.gov
GLNPO	Jane Collaborator	312-XXX-XXXX	a.collaborator@epa.gov

EXTERNAL PARTNERS			
Community Advocate(s) / Leader(s)	Affiliated Organization or Group	Phone	Email
Community Collaborator 1	CBO-A	216-XXX-XXXX	b.collaborator@cboA.gov
Community Collaborator 2	CBO-A	330-XXX-XXXX	c.collaborator@cboA.gov
Community Collaborator 3	CBO-B	512-XXX-XXXX	d.collaborator@cboB.gov
State Collaborator 4	State Agency	312-XXX-XXXX	e.collaborator@state.gov

❖ Roles and Responsibilities

- Who are the program contacts for each Assessment Workplan element?
- What are the expected tasks of each team member?
- Have the Assessment Workplan elements that need to remain confidential been established, where applicable?
- Who are the subject matter experts for each Assessment Workplan element?
- What are the expected tasks of each team member?

COLLABORATION AND ENGAGEMENT TEAM ROLES AND RESPONSIBILITIES		
Partner(s)	Name(s)	Roles and Responsibilities:
EJ Program Collaborator		Will be responsible for generating the preliminary evaluation on the reported issues/concerns.
LCRD Collaborator		Will...
ARD-APS Collaborator		Will...
GLNPO Collaborator		Will...
Community Collaborator 1		Will provide available local resources on elevated blood lead levels in children residing in zip code 48217.
Community Collaborator 2		Will...
State Collaborator 4		Will...
USACE Collaborator		Will...

❖ Multi-Partner Coordination (including federal entities, state and local government, and community-based groups/organizations)

- Discuss and decide the following amongst partners from the internal and external team at each phase of the Community Action Roadmap:
 - How will the project team review the Assessment Workplan elements for consensus on assessments needed?
 - Is there consensus on timeframes to perform assessments needed from the Assessment Workplan?
 - What actions are priorities from the Proposed Action Table?
 - Is there consensus on any elements that should not be carried forward at this time? (e.g., lack of authority, lack of resources, etc.)
 - Is there consensus on the Proposed Action Table recommended to address the concerns/needs raised?
 - How will the project team review the Priority Action Table for consensus on assessments needed?
 - Is there consensus on timeframes to implement actions listed in the plan?
 - How will updates will be communicated with internal partners?
 - How will updates will be communicated with external partners?
 - Who will updates be shared with beyond the established collaboration team?

❖ Engagement Mechanisms

- Discuss and establish the following coordination mechanisms for meeting location, duration, and frequency:
 - How often will meetings occur/what length?
 - What interface will the team use? (Teams, Zoom, etc.)
 - Who will set and distribute the agenda for input?
- Establish future community engagement endeavors:
 - Who is best poised to initiate future community engagement efforts based on each concern/need raised in the assessment workplan?
 - Is there a need or request to provide training to community representative team members to ensure capacity-building and leadership development for residents in the future?
 - In what form will updates to the Community Action Plan be communicated (e.g., email, community meeting, newsletter, etc)?
 - Are there specific community groups or individuals that need to be invited to future community engagement efforts?
 - Is there a regular community meeting for engagement on assessment workplan review?
 - What considerations exist for in person vs virtual community engagement? Are there existing concerns with a digital divide in the community?
 - Is there an existing community space for in person community engagement session?

❖ Information Sharing Mechanisms

- Discuss and decide the following for establishing data sharing methods:
 - Where will information/data for the internal team be stored for review and collaboration?
 - Where will information/data for the internal and external team be stored for review and collaboration?
 - How will updates to each of the above be shared?
 - For the above, consider where a GIS database could house information for collaborative review.¹

¹ See Page 10 of EPA's Collaborative Problem Solving Model, available at www.epa.gov/system/files/documents/2021-12/ejps-model-guide.pdf

² See page 8 of EPA's Community Problem Solving Model, "GIS enables stakeholders to appreciate the conditions expertise in the affected community. Once the information compiled and configured, GIS maps can also become effective tools for integrated problem-solving." Available at <https://www.epa.gov/system/files/documents/2021-12/ejps-model-guide.pdf>

❖ Action Item Table Example

PROPOSED ACTION ITEMS TABLE							DRAFT: 6-29-2023								
Proposed Activity Type	Potential Partnering Organizations	Estimated Timeframe	EPA Point of Contact	Description	Scheduled Event Dates	Target Areas/Locations	Notes/Comments	Proposed Activity Type	Potential Partnering Organizations	Estimated Timeframe	EPA Point of Contact	Description	Scheduled Event Dates	Target Areas/Locations	Notes/Comments
soilHOP Events	EPA R5 CLASH NEOBHC	Ongoing	Elizabeth Saphique, Shannon	EPA brings XRF to scan residents' soil samples for lead and to discuss healthy homes issues (lead, bad bugs, roaches, pesticides, air quality)	August 5 August 12 August 20 August 27	Old Brooklyn East Cleveland Parish Wood Hill Homes Mt. Pleasant	Old Brooklyn Farmers Market Cott Road Farmers Market 141, Purple Oasis Garden Concerned Citizens Community Council	Agency Focused Outreach	NEOBHC MetroHealth FERSU Villains of Healing			community partners and healthcare providers to access this demographic			
Blood-Lead Testing Barrier Analysis	CLASH	Ongoing	N/A	Conducting a survey (100+ respondents) and follow-up focus groups to assess the barriers to kids getting BLL testing	Ongoing			In-home Childcare Provider Focused Outreach	EPA R5 CLASH BCDI NEOBHC Early Childhood Options	August-September	Elizabeth & Saphique	Developing materials (information, grant resources) and strategy for targeting in-home childcare providers, who often fall through the cracks or are overlooked			Pushing this by a month. It might be a good idea to couple it with back-to-school activities – find sponsors to provide some teacher supplies etc?
Renovation, Repair, and Painting (RRP) - Free Course	EPA R5 Public Health and Safety (PHS) Cleveland City Council	July/August	Shannon	EPA R5 will sponsor a free RRP course for renovators in Cleveland, facilitated by our contracting partner PHS	July 29	Cleveland, OH		Parent Engagement for Childcare Providers	EPA R5 BCDI Early Childhood Options All Around Children Centers	August-September	Elizabeth & Saphique	Develop materials (information & resources) specifically for parents of children 0-6 to be distributed by childcare providers; and/or hold event(s) for parents and childcare providers to be hosted at childcare facility.			Pushing this by a month. It might be a good idea to couple it with back-to-school activities – find sponsors to provide some backpacks etc?
Community Lead Awareness (2+ sessions)	EPA HQ EPA R5 CLASH NEOBHC LEOC CCOAL Environmental Health Watch	September/October	Shannon	Informational training sessions hosted by EPA HQ and R5 staff • Understanding Lead: basics of lead hazard and exposure, for general audience Train-the-Trainer: tailored training sessions to enable community leaders to inform their communities/affiliates	Pending	Cleveland, OH		Prenatal Prep	EPA R5 CLASH BCDI	October	Shannon & Elizabeth	Develop materials (information & resources) specifically for pregnant people and work with			

❖ Management Strategy Example

MANAGEMENT STRATEGY EXAMPLE

PURPOSE: This document is intended to be a guide for establishing a Management Strategy, as discussed in the Reporting and Monitoring Phases of the Community Action Roadmap (CAR) and this SOP. The Management Strategy should be used to coordinate efforts for executing and sustaining recommended actions and evaluating progress on these actions, their impacts on the community conditions, and the overall CAR process. It will also incorporate new partnerships and any role and responsibility changes and measures for sustaining partnerships developed during the development of the Community Action Plan (CAP).

❖ CAP Management Strategy Team

INTERNAL PARTNERS				
EPA Program/Office	Name of Contact	Phone	Email	
EJ Program	Aim Collaborator	312-XXX-XXXX	x.collaborator@epa.gov	
LCRD	Joe Collaborator	312-XXX-XXXX	y.collaborator@epa.gov	
FEMA	Anne Collaborator	312-XXX-XXXX	z.collaborator@epa.gov	
GLNPO	Jane Collaborator	312-XXX-XXXX	a.collaborator@epa.gov	

EXTERNAL PARTNERS				
Community Advocate(s)/ Leader(s)	Affiliated Organization	Phone	Email	
Community Collaborator 1	CBO-A	216-XXX-XXXX	b.collaborator@cboA.gov	
Community Collaborator 2	CBO-A	330-XXX-XXXX	c.collaborator@cboA.gov	
Community Collaborator 3	CBO-B	513-XXX-XXXX	d.collaborator@cboB.gov	
Department of Health Collaborator	DOH	614-XXX-XXXX	e.collaborator@doh.gov	
State Collaborator	State Agency	614-XXX-XXXX	f.collaborator@state.gov	

❖ Tracking Progress and Reporting on Commitments

- a) Ensure internal and external partners are in consensus on their roles and responsibilities regarding the completion and tracking of the commitments.
 - i) Have members of the internal and/or external team changed? If so, is it clear who is accountable for each action item?
 - ii) Which partner is responsible for tracking and reporting on specific elements of the co-designed commitments?
 - iii) What are the agreed upon process and timeline for completing each commitment?
 - iv) How will outcomes and outputs for each commitment be shared with the Team and the community? How frequently will these reports be disseminated?
 - v) Are there lessons learned or best practices that can be incorporated as commitments are executed?

❖ Process and Impact Evaluations

- a) Develop a process for evaluating the implementation of commitments and the execution of the Phases of the CAR.
 - i) Is there evidence that we are accomplishing the work we set out to do? (i.e., Action Items implemented according to the processes that were collectively agreed upon)
 - ii) How is the collaborative effort between internal and external partners?
 - iii) How effective are the community engagement activities?
 - iv) Are community residents able to identify beneficial impacts and outcomes?

- v) What conflict resolution techniques have effectively been employed? Which had the best results?
- vi) What mechanisms are in place to ensure the pulse of the community are at the forefront of the decision-making process?
- vii) What are lessons learned at each Phase?
- viii) What best practices were captured in the process of addressing cumulative impacts?

❖ Coordination and Engagement Mechanisms:

- a) Discuss and establish the following coordination mechanisms for meeting location, duration, and frequency:
 - i) How often will meetings occur and for what length of time?
 - ii) What platform will be used? (MS Teams, Zoom, etc.)
 - iii) Who will lead and distribute the agenda?
 - iv) How will information/data be stored for review and feedback? Consider where a GIS database could house information for collaborative review.

MANAGEMENT STRATEGY EXAMPLE		
Partner(s)	Name(s)	Roles and Responsibilities:
EJ Program Collaborator		Will ...
		Will ...
LCRD Collaborator		Will ...
		Will ...
ARD-APS Collaborator(s)		Will ...
		Will ...
Community Based Organization Collaborator(s)		Will ...
		Will ...
DOH Collaborator(s)		Will ...
		Will ...
State Agency Collaborator(s)		Will ...
		Will ...

¹ See page 8 of EPA's Community Problem Solving Model, "GIS enables stakeholders to appreciate the conditions expertise in the affected community. Once the information compiled and configured, GIS maps can also become effective tools for integrated problem-solving." Available at <https://www.epa.gov/system/files/documents/2021-12/cpcr-model-guide.pdf>

5.2. MENU OF EJ APPROACHES IN EPA PROGRAMS

- ❖ Superfund and Emergency Management:
 - [Environmental Justice Best Practices](#)
 - [Superfund Community Involvement Handbook](#)
- ❖ Air
 - General:
 - [Air Quality Partnerships with Communities](#)
 - Permitting:
 - [Environmental Justice for CAA Permits in Region 5](#)
 - [EJ in Air Permitting - Principles for Addressing Environmental Justice Concerns in Air Permitting](#)
 - [EPA Region 5 Regional Implementation Plan to Promote Enhanced Public Participation in Permitting Activities](#)
 - [Environmental Justice and Civil Rights in Permitting Frequently Asked Questions](#)
- ❖ Enforcement
 - [Final Guidance for Evaluating and Recording Environmental Justice \(EJ\) Information](#)
- ❖ EJ Legal Tools:
 - EPA's [EJ Legal Tools](#) document identifies a wide range of legal authorities that EPA can deploy to ensure its programs and activities protect the health and environment of all communities. It also addresses new statutory authorities promulgated since the previous EJ Legal Tools analysis, more consistent approaches to advancing EJ and equity through cooperative federalism, and additional opportunities to ensure civil rights compliance by recipients of EPA funding. The Cumulative Impacts Addendum builds on the EPA Legal Tools. The Addendum is a compilation of legal authorities available to EPA for identifying and addressing cumulative impacts on communities with EJ concerns and other underserved populations, including communities of color, Indigenous peoples, and low-income communities. It states that EPA's legal authority to address cumulative impacts in communities with EJ concerns permeates the full breadth of the Agency's activities—including, for example, standard-setting, permitting, cleanup, emergency response, funding, planning, state program oversight, and other decision-making, as well as initiating administrative or judicial action in situations where there is actual or potential for imminent and substantial endangerment.

COLLABORATION AND ENGAGEMENT STRATEGY

PURPOSE: This document is intended as a guide for establishing a Collaboration and Engagement Strategy, as discussed in the Scoping Phase of the Community Action Roadmap (CAR) and its SOP. Collaboration and Engagement Strategy should be used to organize multiple partners, discuss the capacity and roles and responsibilities of each a partner, timelines for completing assessments, and information needed for next steps. This strategy will highlight resources needed to educate the team on issues/concerns to ensure a robust understanding of community’s articulated vision, goals, history, and practices, while building trust with local and community-based partners.

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State Collaborator 4	State Agency	312-XXX-XXXX	e.collaborator@state.gov

❖ Roles and Responsibilities

- i) *Who are the program contacts for each Assessment Workplan element?*
- ii) *What are the expected tasks of each team member?*
- iii) *Have the Assessment Workplan elements that need to remain confidential been established, where applicable?*
- iv) *Who are the subject matter experts for each Assessment Workplan element?*
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State Collaborator 4		Will...
USACE Collaborator		

- ❖ Multi-Partner Coordination (including federal entities, state and local government, and community-based groups/organizations)
 - a) Discuss and decide the following amongst partners from the internal and external team at each phase of the Community Action Roadmap:
 - i) *How will the project team review the Assessment Workplan elements for consensus on assessments needed?*
 - ii) *Is there consensus on timeframes to perform assessments needed from the Assessment Workplan?*
 - iii) *What actions are priorities from the Proposed Action Table?*
 - iv) *Is there consensus on any elements that should not be carried forward at this time? (e.g., lack of authority, lack of resources, etc)*
 - v) *Is there consensus on the Proposed Action Table recommended to address the concerns/needs raised?*
 - vi) *How will the project team review the Priority Action Table for consensus on assessments needed?*
 - vii) *Is there consensus on timeframes to implement actions listed in the plan?*
 - viii) *How will updates will be communicated with internal partners?*
 - ix) *How will updates will be communicated with external partners?*
 - x) *Who will updates be shared with beyond the established collaboration team?*
- ❖ Engagement Mechanisms
 - a) Discuss and establish the following coordination mechanisms for meeting location, duration, and frequency:
 - i) *How often will meetings occur/what length?*
 - ii) *What interface will the team use? (Teams, Zoom, etc.)*
 - iii) *Who will set and distribute the agenda for input?*
 - b) Establish future community engagement endeavors:
 - i) *Who is best posed to initiate future community engagement efforts based on each concern/need raised in the assessment workplan?*
 - ii) *Is there a need or request to provide training to community representative team members to ensure capacity-building and leadership development for residents in the future?¹*
 - iii) *In what form will updates to the Community Action Plan be communicated (e.g., email, community meeting, newsletter, etc)?*
 - iv) *Are there specific community groups or individuals that need be invited to future community engagement efforts?*
 - v) *Is there a regular community meeting for engagement on assessment workplan review?*
 - vi) *What considerations exist for in person vs virtual community engagement? Are there existing concerns with a digital divide in the community?*
 - vii) *Is there an existing community space for in person community engagement session?*
- ❖ Information Sharing Mechanisms
 - a) Discuss and decide the following for establishing data sharing methods:
 - i) *Where will information/data for the internal team be stored for review and collaboration?*
 - ii) *Where will information/data for the internal and external team be stored for review and collaboration?*
 - iii) *How will updates to each of the above be shared?*
 - iv) *For the above, consider where a GIS database could house information for collaborative review.²*

¹ See Page 10 of EPA’s Collaborative Problem Solving Model, available at www.epa.gov/system/files/documents/2021-12/ejcps-model-guide.pdf

² See page 8 of EPA’s Community Problem Solving Model, “GIS enables stakeholders to appreciate the conditions expertise in the affected community. Once the information compiled and configured, GIS maps can also become effective tools for integrated problem-solving.” Available at <https://www.epa.gov/system/files/documents/2021-12/ejcps-model-guide.pdf>

MANAGEMENT STRATEGY EXAMPLE

PURPOSE: This document is intended to be a guide for establishing a Management Strategy, as discussed in the Reporting and Monitoring Phases of the Community Action Roadmap (CAR) and this SOP. The Management Strategy should be used to coordinate efforts for executing and sustaining recommended actions and evaluating progress on these actions, their impacts on the community conditions, and the overall CAR process. It will also incorporate new partnerships and any role and responsibility changes and measures for sustaining partnerships developed during the development of the Community Action Plan (CAP).

❖ CAP Management Strategy Team

INTERNAL PARTNERS			
EPA Program/Office	Name of Contact	Phone	Email
EJ Program	Alan Collaborator	312-XXX-XXXX	x.collaborator@epa.gov
LCRD	Joe Collaborator	312-XXX-XXXX	y.collaborator@epa.gov
FEMA	Anne Collaborator	312-XXX-XXXX	z.collaborator@epa.gov
GLNPO	Jane Collaborator	312-XXX-XXXX	a.collaborator@epa.gov

EXTERNAL PARTNERS			
Community Advocate(s) / Leader(s)	Affiliated Organization	Phone	Email
Community Collaborator 1	CBO-A	216-XXX-XXXX	b.collaborator@cboA.gov
Community Collaborator 2	CBO-A	330-XXX-XXXX	c.collaborator@cboA.gov
Community Collaborator 3	CBO-B	513-XXX-XXXX	d.collaborator@cboB.gov
Department of Health Collaborator	DOH	614-XXX-XXXX	e.collaborator@doh.gov
State Collaborator	State Agency	614-XXX-XXXX	f.collaborator@state.gov

❖ Tracking Progress and Reporting on Commitments

- a) Ensure internal and external partners are in consensus on their roles and responsibilities regarding the completion and tracking of the commitments.
 - i) *Have members of the internal and/or external team changed? If so, is it clear who is accountable for each action item?*
 - ii) *Which partner is responsible for tracking and reporting on specific elements of the co-designed commitments?*
 - iii) *What are the agreed upon process and timeline for completing each commitment?*
 - iv) *How will outcomes and outputs for each commitment be shared with the Team and the community? How frequently will these reports be disseminated?*
 - v) *Are there lessons learned or best practices that can be incorporated as commitments are executed?*

❖ Process and Impact Evaluations

- a) Develop a process for evaluating the implementation of commitments and the execution of the Phases of the CAR.
 - i) *Is there evidence that we are accomplishing the work we set out to do? (i.e., Action items implemented according to the processes that were collectively agreed upon)*
 - ii) *How is the collaborative effort between internal and external partners?*
 - iii) *How effective are the community engagement activities?*
 - iv) *Are community residents able to identify beneficial impacts and outcomes?*

- v) *What conflict resolution techniques have effectively been employed? Which had to best results?*
- vi) *What mechanisms are in place to ensure the pulse of the community are at the forefront of the decision-making process?*
- vii) *What are lessons learned at each Phase?*
- viii) *What best practices were captured in the process of addressing cumulative impacts?*

❖ **Coordination and Engagement Mechanisms:**

- a) Discuss and establish the following coordination mechanisms for meeting location, duration, and frequency:
 - i) How often will meetings occur and for what length of time?
 - ii) What platform will be used? (MS Teams, Zoom, etc.)
 - iii) Who will lead and distribute the agenda?
 - iv) Where will information/data be stored for review and feedback? Consider where a GIS database could house information for collaborative review.¹

MANAGEMENT TEAM ROLES AND RESPONSIBILITIES		
Partner(s)	Name(s)	Roles and Responsibilities:
EJ Program Collaborator		Will ...
		Will ...
LCRD Collaborator		Will ...
		Will ...
ARD-APS Collaborator(s)		Will...
		Will ...
Community Based Organization Collaborator(s)		Will ...
		Will ...
DOH Collaborator(s)		Will ...
		Will ...
State Agency Collaborator(s)		Will ...
		Will ...

¹ See page 8 of EPA’s Community Problem Solving Model, “GIS enables stakeholders to appreciate the conditions expertise in the affected community. Once the information compiled and configured, GIS maps can also become effective tools for integrated problem-solving.” Available at <https://www.epa.gov/system/files/documents/2021-12/ejcps-model-guide.pdf>