



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

JUN 29 2011

DEPUTY ADMINISTRATOR

MEMORANDUM

SUBJECT: Response to the Office of Inspector General Evaluation Report, *EPA Needs an Agency-Wide Plan to Provide Tribal Solid Waste Management Capacity Assistance*, Report No. 11-P-0171

FROM: Bob Perciasepe *Bob Perciasepe*

TO: Jeffrey K. Harris
Director for Program Evaluation, Cross Media Issues
Office of Program Evaluation
Office of Inspector General

I appreciate the opportunity to review and respond to the Office of Inspector General Evaluation Report, *EPA Needs an Agency-Wide Plan to Provide Tribal Solid Waste Management Capacity Assistance*, dated March 21, 2011. On behalf of the U.S. Environmental Protection Agency, I want to thank the Office of Inspector General for its recommendations for improving the EPA's efforts to assist in building tribal solid-waste management capacity. The EPA concurs with all of your recommendations. Following is our response to each of the recommendations, including your request for a corrective action plan for agreed-upon actions and milestones.

SPECIFIC RECOMMENDATIONS AND RESPONSES

OIG Recommendation 1: Develop and implement an agencywide plan for providing consistent and effective tribal solid-waste management capacity assistance that is within the scope of the EPA's authority and responsibility.

EPA Response: We appreciate the clarification the OIG provided regarding the scope of the recommended agencywide plan. The EPA believes that the more narrow scope, clearly focusing on the activities that are within the scope of the EPA's authority and responsibility, makes it feasible to concur with the recommendation to develop and implement an agencywide plan. The EPA has created a national workgroup to draft an agencywide plan, consistent with the EPA's statutory and regulatory authority, where the primary goals are to foster sustainable solid-waste management, address high-risk dumps, prevent new and repeat dumps and build tribal capacity to operate sustainable tribal integrated waste programs. We anticipate that the EPA will complete the agencywide plan by April 30, 2012, and will commence its implementation immediately thereafter. This timeline reflects the need for coordination among the EPA's regions and offices and consultation with tribes pursuant to the EPA's *Policy on Consultation and Coordination with Indian Tribes*.

OIG Recommendation 2a: Require that the agency-specific plan include descriptions of the roles and responsibilities for the EPA's program offices and regions conducting solid-waste management capacity assistance activities.

EPA Response: The agencywide plan will include descriptions of the roles and responsibilities of headquarters and regional offices for conducting solid-waste management capacity assistance activities, as well as activities they will conduct under the identified and assigned tasks of the agencywide plan.

OIG Recommendation 2b: Require that the agency-specific plan include identification of the agency resources required for providing solid-waste management assistance activities.

EPA's Response: The agencywide plan will identify the current resources, including FTE allocated within the EPA for tribal solid-waste management capacity assistance activities and the resources needed to fully implement the agencywide plan and their potential sources. The EPA has started to collect this resource information.

OIG Recommendation 2c: Require that the agency-specific plan include performance measures, including both output and outcome measures, to track whether its assistance is consistent and effective in developing solid-waste management capacity and reducing risks from open dumps in Indian country.

EPA's Response: In the agencywide plan, the EPA will outline an approach to evaluate the current national performance measures. This will help the EPA determine if these measures are effective in tracking whether its assistance is consistent and effective in developing solid-waste management capacity and reducing risks from open dumping. It also will determine whether the EPA needs any new national performance measures. In the interim, the EPA will continue to track the existing national performance measures in developing solid-waste management capacity and reducing risks from open dumping. Also, note that any new measures would need to comply with the new data-quality records quality-assurance/quality-control requirements for external performance measures.

OIG Recommendation 2d: Require that the agency-specific plan include internal controls to ensure consistent data collection and consistent provision of waste-management capacity assistance to tribal clients nationwide.

EPA's Response: The agencywide plan will include internal controls to ensure consistent data collection and consistent provision of waste-management capacity assistance where they are appropriate. In March 2011, the EPA formed a workgroup to address the issues stemming from this recommendation.

OIG Recommendation 2e: Require that the agency-specific plan include a process to ensure coordination among the EPA's program offices and regions.

EPA's Response: The EPA will evaluate the current coordination processes for coordinating between regions and headquarters program offices and enhance or modify as needed. This includes assessing the existing monthly conference calls between regions and the EPA's program offices and several regular meetings and calls among the EPA's program offices. In addition, a sub-lead region communication strategy already exists for use as a basis for communicating the regional perspective.

OIG Recommendation 2f: Require that the agency-specific plan include a timeline specifying when the activities and outcomes outlined in the plan are expected to be accomplished.

EPA's Response: We expect to complete the agencywide plan by April 30, 2012. It will include timelines for implementation and completion of the activities outlined in the plan.