



REPORT OF THE PERFORMANCE MEASURES WORKING GROUP OF THE PPDC

Introduction

This report provides an overview of OPP's performance measures project and the observations of the PPDC working group (hereafter "PPDC Group" or "Group") on OPP's project. The PPDC Group is basing these observations on the briefings and information provided by OPP, and the discussions of the Group. A listing of the draft performance measures currently under consideration by OPP is included as Appendix A.

To date, the PPDC Group has held four meetings to discuss the performance measures. The first meeting was held on September 26, 2005 to bring the PPDC Group together, provide basic information about OPP's performance measures project, and discuss the "charge" to the Work Group. A second meeting was held on October 20, 2005 in conjunction with a full PPDC meeting. At the second meeting, there was a more detailed presentation and subsequent discussion on the "Other Benefits" measures. The third meeting was an all day face-to-face meeting held at OPP's offices to discuss all of the measures in greater depth with the OPP staff responsible for creating the measures. A fourth meeting was held on June 14, 2006 in conjunction with the PPDC meeting the following day. The primary topics for that meeting were comments on the draft report, and developing the presentation for the PPDC meeting. The agenda and meeting notes from each of these meetings are posted at:
<http://www.epa.gov/oppfead1/cb/ppdc/perf-meas>.

As stated at the initial meeting, the charge to the Work Group was::

- (1) "Provide advice through the PPDC on the measures OPP develops,"
- and
- (2) "Provide ideas through the PPDC about other ways to measure performance."

Background: OPP's Performance Measures Process

In April 2005 Jim Jones, the OPP Office Director, initiated a process for revamping OPP's performance measures. His purpose for revamping the performance measures was to develop measures that supported the

programmatic goal and demonstrated progress towards meeting that goal. He identified three major mission areas for OPP: (1) protect human health, (2) protect the environment, and (3) realizing other benefits from OPP. Work groups were convened for each mission area. The “charge” for these work groups was to develop outcome-based performance measures that demonstrate the effect of OPP’s programs in the “real” world.

Over the next year, OPP will continue to focus on the development of these new performance measures. In some cases, the new measures may be incorporated into various Agency accountability structures such as the draft EPA 2006 - 2011 Strategic Plan. By beginning to use these new measures, OPP is not closing the door on innovation, but using this as an opportunity to “test drive” the new measures. Indeed, OPP sees the improvement of performance measures as a process of continuing improvement.

Observations of the PPDC Working Group

During the course of our meetings, we raised a great number of issues. The following list of observations was honed down to present what the Group feels are the key points for OPP to consider as it goes forward with its performance measures project.

Note: The numbers assigned for each observation below were assigned to provide for easy reference; they are not indicative of priority or importance.

General and Process Observations

1. OPP is to be commended for reaching out to its stakeholders as it is developing these measures. The Group requests that OPP continue this dialogue by providing feedback to this Group on how its observations were used by OPP.
2. It is important to recognize both the risks and benefits of pesticides. While it is important that OPP has included “Other Benefits” in its measures the work is not as far along nor as extensive as the other mission areas.
3. The Pesticide Program is immense. The Group is concerned that the measures don’t capture the full extent of OPP’s activities. It would be easier to understand and make comment on the Agency’s measures process if OPP were to provide an in-depth discussion of a particular measure or two. The Group suggests that instead of trying to institute immediate measures that cover the entire program, it would be wise to conduct a few pilots that focus on a segment of the regulated community.
4. The Group also observes that there is a balance to be struck between showing the outcomes of the program on a national basis and recognizing that many of the impacts are regionally based.

5. OPP should not abandon all of its “old” output measures (e.g., number of registrations per year) in moving to these new measures. The Group cautions OPP against immediately dropping the tried and true measures for completely new and untested measures. These outputs are valuable measures of OPP activities that are well-understood and important to stakeholders who rely on the agency producing these results. Moreover, they are a measure of the success in meeting the statutory mandate to license and regulate pesticides. While it is important to characterize the impacts of the program (i.e., create outcome measures), it is just as important to recognize that the outputs are the building blocks upon which the characterization is based and that the outcomes of pesticide registration are determined by the marketplace.
6. The Group advises OPP to make decisions about measures based on the data available to support those measures. If OPP determines that sufficient data exist, OPP should move forward with the measures data. In several cases, OPP is using databases from other agencies to support their measures. Given this reality, the Group notes that it is important for OPP to continue to coordinate with other agencies on data gathering so that OPP does not lose those measures.
7. Data collection and analysis have significant costs. The Agency should mine any available data for trends to the extent possible, and utilize tools such as modeling and extrapolation to get the most information possible out of the available data. Any resources put towards measurement should have a significant return on investment; any commitment of resources should be strategic and not at the expense of program responsibilities.

Mission Area: Protect Human Health (including worker safety)

8. OPP should be cautious when using the National Health and Nutrition Examination Survey (NHANES) data because the data could underestimate the risk in some instances, and overestimate the risk in others. OPP should continue to work with the Centers for Disease Control (CDC) in selecting chemicals for analysis in the NHANES. It is suggested that OPP select a few sentinel pesticides where there is more confidence in NHANES data to provide an overall picture. It was also suggested that EPA use the Total Diet Study conducted annually by FDA as a measure of exposure in the human diet.
9. There was concern in the Group that having measures that reduce the levels of pesticides without any qualification of that statement could give the impression that current levels are unacceptable. For example, why should lowering residue levels be a priority if current tolerance levels are protective? As a corollary, OPP has couched many of its measures in

terms of “reducing risk.” Due to the fact that there may be situations where OPP would be reducing risk below a health-based level, it may be more appropriate to use the term “minimizing exposure.”

Some of the Group believe that the measure to reduce levels of pesticides should remain “as is” in light of the fact that all pesticides have not been evaluated for specific toxicity to children, nor have had a complete evaluation for neurodevelopmental toxicity. If, for a certain pesticide there are sufficient data including neurodevelopmental toxicity, then the focus can shift to minimizing exposure.

10. The Group is concerned with the proper use of Poison Control Center (PCC) data. Before using these data, the Work Group believes that it is important for OPP to validate the data. Further, it is important to discern residential poisonings from work-related incidents.
11. This mission area could be improved by adding measures that demonstrate the positive public health outcomes as a result of OPP’s antimicrobial products work and vector control programs.

Mission Area: Protect the Environment (Including Water Quality, Endangered Species)

12. The Group observed that OPP measures are primarily focused on protecting endangered species. While protection of these species is critical and a matter of law, OPP should look to protecting other organisms in the environment. The Group encourages OPP to think beyond endangered species in consideration of measures for protection of other species in the environment. The Group notes that the U.S. Geological Survey Breeding Bird data may prove useful in looking beyond endangered species.
13. It is the Group’s observation that many of the performance measures under consideration deal with aquatic environments. The Group strongly encourages OPP to develop measures for protection of terrestrial ecosystems.

Mission Area: Realizing Other Benefits (including SAI + PESP)

14. The Group recommends a change in name for this mission area. Suggestions include, but are not limited to: “Value of Pesticide Availability” and “Societal Benefits.”

15. The Group observed that the measures don't adequately portray the very positive outcomes of the environmental stewardship efforts that OPP has encouraged and developed. The stewardship and virtually all of the "Other Benefits" measures are well-behind in the process. This leaves the Group with the concern that insufficient attention and expertise are being applied to their development. The Group encourages OPP to develop more and stronger measures focused on environmental stewardship. In particular, the Group recommends that OPP look to the Integrated Pest Management (IPM) in schools program for demonstration of real impact on real world exposure and risk. The Group further notes that there are extensive data that could be used to support such a measure.

16. It is the observation of the Group that there are so many more possibilities for measuring the benefits realized by OPP. Examples include, but are not limited to:
 - (a) develop a measure that captures the benefits to the U.S. economy in assuring that our agricultural exports meet the sanitary and phytosanitary (SPS) requirements of importing countries;
 - (b) develop a "quality of life" measure that captures the benefits to homeowners of a home that is free from insects (e.g., roaches), reducing the "yuck factor" for homeowners;
 - (c) track how pesticide registrations increase or decrease global competitiveness for American agriculture;
 - (d) measure the success of EPA incentives for industry to develop and register reduced risk chemicals; and
 - (e) measure the global impact of OPP in risk assessment and registration review, especially through OPP's work with our international partners.

The Group would be interested in working with OPP to generate more ideas for measures in this mission area.

17. The Group encourages OPP to solicit ideas beyond this Work Group for additional measures in this mission area.

Conclusion and Next Steps

The Work Group has identified several steps:

- Submit a final report for the full PPDC to consider;

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- Stay in touch with OPP to provide advice/support to OPP on key performance measurement issues as they come up;
- Review any new performance measures developed by OPP, and any measures as they are finalized by OPP; and
- Track implementation of the performance measures.

As a result of the discussion held at the PPDC meeting on June 15, the Work Group agreed to submit its final report by the end of June. The PPDC will consider the report and take action on it via conference calls that will be arranged by OPP.

The full PPDC has agreed that the Work Group should continue to function; however, it will be on an “as needed” basis.

APPENDIX A:**LIST OF DRAFT PERFORMANCE MEASURES
CURRENTLY UNDER CONSIDERATION BY OPP**

Key: Light gray shading = measures in Strategic Plan
Dark gray shading = efficiency measure accepted by OMB

Measure	Description	Comments
HH1	Reduce the level of certain OPs in the general population (NHANES)	In draft Agency Strategic Plan
HH2	Measure concentration in drinking water over time as a result of mitigation	Needs further development
HH3	Reduce pesticide residues in the 20 foods most commonly eaten by children using FDA surveillance data	
HH4	Ensure efficacious public health antimicrobial products in the marketplace	Needs further development
HH5	Reduce the number of acute poisoning incidents from pesticides in and around the home	
WS1	Survey of ag workers' awareness of WPS provisions	Needs further development
WS4	Support a low rate of poisoning incidents	In draft Agency Strategic Plan
WS6	Cumulative reduction in moderate – severe incidents for 6 pesticides with highest incident rate	In draft Agency Strategic Plan
---	Cost per occupational incident avoided	Efficiency measure accepted by OMB
EN1	Using EMAP and pesticide usage data, select and track priority aquatic environments	
EN3	“Meta measure” – using existing measures and data, develop an index to gauge environmental quality as it relates to pesticides	Needs further, long-term development
EN4	Increase % of acreage by crop moving to reduced risk chemicals	
WQ1	Tiered approach to evaluating and managing pesticides to protect water quality	

WQ2	Efficiency measure for evaluating and managing pesticides' water quality	
WQ3	Tiered approach to managing 303(d) list concerning pesticides	Needs further development
ES1	Percent reduction each year in average cost and average time to produce ES Bulletin	Efficiency measure accepted by OMB
ES3	Cumulative % of Sec. 18 requests with a credible effort to consider ESA implications	Needs further development
ES4	Cumulative % of Section 3 actions for which OPP has made ES determinations and implemented protections, as necessary	In draft Agency Strategic Plan
NEW	Reduce the % of urban and ag watersheds exceeding aquatic life benchmarks using NAWQA	In draft Agency Strategic Plan
OB1	Avoided crop loss due to pests measured through section 18/section 3 program	In draft Agency Strategic Plan
OB2	Decreased costs associated with pesticide exposure (benefits from "me-too" registrations)	
OB6	Resistance management	Needs further development
OB7	Reduce expenditures resulting from insect structural damage	In draft Agency Strategic Plan
OB8	Incidents and costs associated with vector borne diseases	Needs further development
SA1	Reports in SAI database show increase in use of whole farm practices on transition gradient	
SA2	Number of additional acres using reduced risk pest management practices per grant and contract dollars spent on environmental stewardship	Efficiency measure accepted by OMB
NEW	12 low risk pesticides approved with international partners	