

**Final Report of the FY 2007 SGTM Reporting Workgroup**

**FY 2007 STATE GRANT TEMPLATE MEASURES  
Lessons Learned from FY 2007 and  
Recommendations for FY 2009 and Beyond**

**March 16, 2009**

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## EXECUTIVE SUMMARY

In 2006, OMB examined several major EPA categorical state grant programs and concluded that the Agency needed to improve the alignment of state grants to the Agency's strategic mission, and that grants be accompanied by performance measures that clearly articulate the contributions of the states in achieving the Agency's mission.

In FY 2007, The Office of Management and Budget (OMB) instructed EPA to "... include consistent requirements for regular performance reporting; and allow for meaningful comparisons between various states' past and planned activities and performance." This requirement recognized the importance of states' contributions to achieving EPA's mission. EPA worked cooperatively with the states to implement this OMB requirement by reporting on a common subset of existing Agency performance measures in a standard template in Fiscal Year (FY) 2007, 2008, and 2009 grants management processes.

In December 2007, a workgroup comprised of EPA's Office of the Chief Financial Officer (OCFO) and Office of Grants Debarment (OGD), representatives from individual states, the Environmental Council of the States (ECOS), and EPA program and regional offices was developed to identify lessons learned in EPA's States Grant Template Measures (SGTM) approach and provide recommendations for FY 2009 and beyond (summarized on pages 5-7). All of the recommendations reflect the premise that the SGTM process must change, whether through significant modifications to the current process or through adoption of alternative approaches.

The review of the FY 2007 SGTM process raised serious questions regarding the value of these specific measures to evaluate state grant performance and concerns as to whether the SGTM approach best achieves OMB's objectives. Specifically, **the workgroup finds that the SGTM approach is inadequate to fulfill the objectives of accurately characterizing, delineating, and communicating results under state grants relative to EPA's mission. The workgroup recommends that alternative approaches be explored to fulfill these important objectives.** While most of the FY 2007 SGTMs are helpful in assessing some aspect of state grant performance, SGTMs are not intended to and do not provide a complete picture of states' performance and accomplishments under EPA's grant programs.

EPA and the states have already addressed several of the FY 2007 SGTM Reporting Workgroup's preliminary findings and recommendations,<sup>1</sup> as reflected in EPA's Final Guidance Implementing the State Grant Template Measures in FY 2009.<sup>2</sup> In addition, a FY 2009 standardized workplan pilot is underway to address challenges associated with the SGTM approach and OMB's direction to EPA. If the SGTM approach continues, significant changes are necessary, and any alternative approach will need to address the same concerns raised in this document. The Workgroup recommends the following next steps (discussed on page 11):

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<sup>1</sup> FY 2007 Lessons Learned Summary (Draft): [http://www.epa.gov/performance/state\\_grant\\_workplans.htm](http://www.epa.gov/performance/state_grant_workplans.htm)

<sup>2</sup> Final Guidance Implementing the State Grant Performance Measures Template in FY 2009. July 2008. Office of Congressional and Intergovernmental Relations, Office of Grants and Debarment, and Office of Planning, Analysis and Accountability. Available at [http://www.epa.gov/performance/pdfs/2009\\_state\\_grant\\_template.pdf](http://www.epa.gov/performance/pdfs/2009_state_grant_template.pdf)

- **Clarify the goals of the SGTm process and develop and evaluate alternative options for presenting state results.** (This is the most important next step as it drives all that follow.) Evaluate — as possible alternatives to the separate template of measures attached to workplans — both the results from the FY 2009 standardized work plan pilot and the findings from the OGD effort to collect information on other Federal agencies' grant performance reporting. Assess whether potential management benefits of alternative approaches justify additional burden, and consider the impacts of alternative measures/methodologies/approaches to reach the goals identified.
- **Manage data more effectively and efficiently.** Establish a process for EPA headquarters, regions, and state offices to collaborate in the development, management, and improvement of grant reporting information. All processes should be complimentary to and integrated with grants processes and documentation.
- **Continue to improve the accessibility and transparency of data for all stakeholders.** Make EPA Measures Central the complete repository for measurement information, including state results, caveats, and narratives. Incorporate highlights of annual state results to feature effective state programs and best practices in EPA's annual performance and accountability reports. Develop/display data on EPA's website to share results and best practices.
- **Continue to improve communications** within and between headquarters, regional, and state staff regarding grant procedures, program performance, and results reporting. **Clarify/specify roles and responsibilities** for the implementation of the SGTm process or other alternatives.

## **FY 2007 STATE GRANT TEMPLATE MEASURES Lessons Learned from FY 2007 and Recommendations for FY 2009 and Beyond**

### **OMB DIRECTIVE**

In EPA's FY 2007 Budget, OMB instructed EPA to "... develop a standardized template for states to use in reporting results achieved under grant agreements with EPA. The template must include clear linkages to EPA's strategic plan and long term/annual goals; include consistent requirements for regular performance reporting; and allow for meaningful comparisons between various states' past and planned activities and performance." EPA worked with the states to implement this OMB requirement and used a common performance measures template to be attached to State Grant work plans in the FY 2007, 2008, and 2009 grant management processes.

### **STATE GRANT TEMPLATE MEASURE (SGTM) APPROACH**

EPA's overarching goal for developing the SGTM approach is to improve the ability of EPA and the states to demonstrate results from the Agency's categorical grants (applicable to relevant Performance Partnership Grants (PPGs) or negotiated workplans), and make environmental and program outcomes under state grant work plans more visible and transparent. To achieve this, EPA set out to:

- Involve states early in the SGTM selection and design process.
- Use existing EPA/state measures and data sources where possible to minimize burden on states. In addition, EPA assumed reporting responsibilities with the intent of minimizing additional state reporting burden.
- Use and augment current EPA/state partnership agreements and grant workplans instead of replacing or significantly revising them.
- Integrate this effort with ongoing Agency activities to improve performance measurement and enhance EPA's ability to report on national program results.

EPA and the states — through the ECOS Planning Committee and the Partnership and Performance Workgroup — jointly identified a set of 60 performance measures from EPA's Measures Central. These measures were included as an attachment to FY 2007 grant work plans for the 14 categorical grants listed below and relevant Performance Partnership Grants or negotiated workplans.

### Categorical Grants Subject to the Performance Measures Template

National EPA Program Office	Grant Program
Office of Air and Radiation	State and Local Assistance (CAA Section 105) Indoor Radon
Office of Enforcement And Compliance Assurance	Toxic Substances Compliance (Lead and PCB/Asbestos) Pesticides Enforcement
Office of Prevention, Pesticides and Toxic Substances	Lead Pesticides Program Implementation
Office of Solid Waste and Emergency Response	Hazardous Waste Financial Assistance Brownfields (CERCLA Section 128) Underground Storage Tanks
Office of Water	Pollution Control (CWA Section 106) Non-point Source Pollution Control (CWA Section 319) Beaches Protection Public Water System Supervision Underground Injection Control

States and EPA recognized that the current set of SGTMs did not reflect all of the work conducted by state agencies with EPA categorical grant funds, and that the current set of SGTMs had limitations. As a result, states and EPA developed the following three special reporting situations or caveats, which are reported with state results on the template that may apply to specific measures under particular categorical grants:

Caveat 1: Measures that reflect broad programmatic goals, and state results achieved may not solely be attributable to the activities funded by the grant.

Caveat 2: Measures that are not applicable to a state grantee because, for example, it does not have the authorization or delegation to carry out a program.

Caveat 3: Measures covering activities not funded by a grant, but currently reported by the state to meet other accountability requirements.

In addition, states sought the opportunity to provide additional context information on the templates, including narratives. FY 2007 final templates were to contain national baseline data, national commitments, national results, state baseline data (where applicable), state measurement, data sources, and state narrative comments if provided. Further, EPA was to enter and report SGTm results in EPA's Measures Central, including state contributions for these measures. However, in practice, EPA did not uniformly seek or was unable to collect caveats and state narrative comments, so contextual information is unavailable for FY 2007.

EPA continued the FY 2007 template approach in FY 2008 and FY 2009, with a number of refinements to improve communication and coordination between EPA and the states, and to capture state results better under the grants. For example, EPA published the SGTMs in the final National Program Manager (NPM) Guidance Document Appendices on the OCFO internet website.

## FY 2007 SGT M REPORTING WORKGROUP

In December 2007, EPA's Office of the Chief Financial Officer (OCFO), along with the Office of Grants Debarment (OGD), convened the FY 2007 SGT M Reporting Workgroup, which included representatives from individual states, ECOS, and EPA program and regional offices. The purposes of the Workgroup were to identify lessons learned from EPA's SGT M approach in FY 2007 and to evaluate possible changes for FY 2009 and beyond. In July 2008, the Workgroup released draft findings and recommendations.<sup>3</sup> Since that time, the Workgroup has refined its findings and recommendations, presented below.

## LESSONS LEARNED & RECOMMENDATIONS

The following recommendations are contingent upon continuation of the SGT M process. Notwithstanding, if the SGT M efforts are discontinued, these lessons learned and recommendations are relevant and should be considered and reflected in any future approach to characterize, track, analyze, and present state performance tied to grants.

Overall, the Workgroup recommends that if the SGT M approach continues, significant changes are necessary soon. EPA and states should jointly evaluate the SGT M process and the FY 2009 standardized workplan pilot approaches. Further, EPA and states should assess how findings from these two efforts inform how a process may be crafted that results in a useful management and communication tool that achieves OMB's objectives. The Workgroup identified seven overarching lessons learned, which are accompanied by recommendations. All of the recommendations reflect the premise that the SGT M process must change — whether through significant modifications to the current process or through adoption of alternative approaches. Appendix 2 provides summaries of specific lessons learned for SGT Ms for each grant program, as provided by EPA's headquarters' offices.

- 1. The current process does not meet the management objective of evaluating state performance tied to EPA categorical grants. In addition, the SGT M process is burdensome and, in some cases, the information is already available through other processes and systems.**

### **Recommendations:**

- 1.1** Clarify the goals of the SGT M process and develop and evaluate options for presenting state results. Evaluate — as possible alternatives to the separate template of measures attached to workplans — both the results from the FY 2009 standardized work plan pilot and the findings from the OGD effort to collect information on other Federal agencies' grant performance reporting. Assess whether potential management benefits of alternative approaches justify additional burden, and consider the impacts of alternative measures/methodologies/approaches to reach the goals identified.
- 2. Communication between and among national EPA program offices and grant offices with headquarters, regional, and with state staff needs to be improved and made more consistent.**

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<sup>3</sup> 2007 Lessons Learned Summary (Draft). Available at [http://www.epa.gov/performance/state\\_grant\\_workplans.htm](http://www.epa.gov/performance/state_grant_workplans.htm)



**Recommendations:**

**2.1** Continue to improve communications within and between EPA headquarters and regional staff and state staff regarding grant procedures, performance, and results reporting.

If the current SGTM process is sustained:

**2.2** EPA, regions and states should review the FY 2008 SGTM process against the OGD published "Final Guidance - Implementing the State Grant Performance Measures Template" for consistency and areas of improvement. Using this report and additional means, EPA and states should provide early input to OGD as it updates its guidance in spring 2009, and explore other means to improve timely and consistent communication regarding state results (SGTMs or an alternative approach).

**2.3** In the long-term, clarify how individual states contribute to performance results (SGTMs or others) that are reported only nationally or regionally, by providing a narrative that explains how the state contributes.

**3. The FY 2007 SGTM implementation process experienced a number of hurdles due, in part, to the large number of individuals, agencies, and offices involved in executing this effort, and a lack of consistency over time of individual staff members working on the project.**

**Recommendation:**

**3.1** Identify points of contact at the headquarters, regional, and state level for reporting on measures related to state participation in EPA funded programs and develop specific roles for members of this group.

**4. Data and the management of the data need to be improved.** Although most of the FY 2007 SGTMs are helpful in assessing some aspect of state performance, the measures provide only a partial picture due to factors such as non-representative measures, data lags, external factors or events (e.g., sewer overflows for beach closures), other funding sources, and missing information. There is a difference between measures used to evaluate grant activity performance, and measures used to track environmental results. The National Environmental Performance Partnership Program System (NEPPS) was designed to focus on states achieving environmental results, having more flexibility and less oversight. It is unclear how to make these distinctions.

**Recommendations:**

**4.1** Collaborate with states and OMB to identify different state grant performance measures, develop new state grant performance measures, or identify alternative approaches that better represent state grant program work under a grant program and provide a more complete assessment of national/state/local activities supported by state grants.

**4.2** States and EPA should continue to work together to review and assess additional context information for state performance (SGTMs or alternatives), communicate state contributions, and share best practices.

**4.3** Continue to include information on baselines, annual results, timeframes, data sources, caveats, and narratives, if provided.

**4.4** Report data limitations and demonstrate to states how a national number is calculated (e.g., through an attachment to the template, grant workplan, or a web link).

- 5. The use of the templates or alternative methods to capturing state performance information needs to be implemented more consistently.** Not all stakeholders have a clear understanding of SGTM methodologies. In addition, it remains unclear when and who will be responsible for collecting, sharing with programs, states, and regions, and entering FY 2008 and FY 2009 SGTM results, caveats, and narrative into Measures Central. SGTMs have various reporting cycles, depending on the grant and whether they are tied to a specific regulatory information system and reporting requirement.

**Recommendations:**

**5.1** EPA program offices and regions and states should use the current published OGD guidance for "Implementing the State Grant Performance Measures Template" with instructions on how EPA program offices should determine and communicate to regions and states the specific time frames for reporting SGTM results (FY 2008 and 2009) associated with their grants into Measures Central, including caveats and additional state comments.

**5.2** Pilot test a comprehensive data dictionary for NPMs, regions, and states that includes:

- Purpose/importance (of measure)
- Source/collection of data (what system/how collected)
- Method and type of calculation
- For national-only and regional-only measures, the methodology used to aggregate or roll up state results into measure results
- Data limitations
- Start date for reporting data
- Desired performance target
- Definition of "met"
- Annual documenting and tracking of changes to reporting process
- Whether measure serves other purposes (GPRA Annual Plan, PART, regional priority measures)
- Definitions

- 6. Access to measures results was not readily available.**

**Recommendations:**

**6.1** Modify EPA's Measures Central to enable regions to enter additional context information at the beginning of the fiscal year (before final results are entered).

**6.2** Explore the use of new technologies for gathering state narrative information electronically in Measures Central and then formalize procedures for entering state narratives with SGTM results.

**6.3** Ensure all appropriate EPA staff can access Measures Central, especially regional staff who are familiar with and need QA/QC performance data (SGTM or alternative). Provide “read-only” access for headquarters staff and states to see regional and state data, and for the regional staff and states to see national program data. Train all appropriate headquarters and regional staff on how to design and print relevant reports in ORBIT.

**7. In some cases, a measure’s language changed after the final NPM Guidance Documents were released, resulting in confusion between EPA and states.**

**Recommendations:**

**7.1** If an NPM is required to change the measure language (e.g., by OMB in the case where SGTMs are also PART measures) after the SGTM Appendices in the OGD guidance have been issued, EPA should communicate the change to regions and states.

**7.2** If that is not possible, the NPM should communicate changes to the regions and states in the draft and final NPM guidance documents, ensuring the language changes are entered into EPA’s Measures Central, SGTM templates in the grant work file, and the final NPM Guidance SGTM Appendices on the OCFO website. Note: states can be held accountable only to the language negotiated and agreed to in the grant work plan and SGTM template.

**PROGRESS IN ADDRESSING PRELIMINARY RECOMMENDATIONS**

While additional work remains, EPA and the states made progress in addressing the SGTM Reporting Workgroup’s preliminary findings and recommendations from the experience of FY 2007 SGTM implementation.

- Roles, responsibilities, and requirements for reporting on SGTM for FY07-FY09 have been clarified and communicated to the appropriate EPA headquarters, region, and state staff.
- The SGTM reporting process has been changed to capture data electronically using EPA’s Measures Central and ORBIT reports.
- EPA’s national program managers and regions have examined the current set of SGTM and begun the process of improving them for FY 2010.
- Communication between national programs, regions, and states on SGTMs process has improved.

EPA's final guidance for implementing the SGTM in FY 2009<sup>4</sup> addresses several issues identified by the SGTM Reporting Workgroup. OGD moved up publication of its document, "Final Guidance - Implementing the State Grant Performance Measures Template." from November to July to better align with regional/state workplan negotiations. The guidance:

- Provides additional information on those measures that are reportable at the state level and those that can be expressed only at the national or regional level, and explains better where regions and states need to provide state-level information and where they do not.
- Requires that NPMs and regions with state input enter caveats linked to SGTM into the state comment field in EPA's Measures Central to the extent possible.
- Clarifies roles and responsibilities for data entry, including what data are entered by NPMs or by regions, and how national and regional data are transmitted back to the regions and states using ORBIT reports. The information included in ORBIT reports and shared by regions with states replaces the paper process and reduces administrative burden greatly.
- Clarifies that changes in measures' language must follow existing joint Agency/state planning, budgeting, and accountability processes. For example, measures language in Measures Central should not change once negotiated with states and included in the final NPM guidance documents.
- Promotes transparency through the use of caveats, documentation of changes in measures, discussion of how results are calculated, and a four-week review period for states to verify baseline and results data, caveats, and supplemental information. In addition, information on measures' methodologies (methods used to calculate national totals) must be documented and attached to the grant file and published in annual NPM guidance documents, including the SGTM Appendices on EPA's web-site.
- Facilitates communication by continuing the practice begun in FY 2008 of designating SGTM single points of contact in EPA headquarters and regions, requesting state single points of contact, and requiring regions to inform and confer with states about the SGTMs.

## **RELATIONSHIP OF THE FY 2009 STATE GRANT WORK PLAN PILOTS TO THE STATE GRANT TEMPLATE MEASURES**

In May 2008, EPA's Office of Grants and Debarment issued guidance for FY 2009 State Grant Work plan Pilots. The pilots will test whether work plans can be structured to achieve greater standardization for state Continuing Environmental Program (CEP) grants that are currently subject to the SGTMs. This effort focused on options that address OMB's concerns and provide flexibility to states and EPA regions, which is consistent with the principles underlying the

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<sup>4</sup> Final Guidance Implementing the State Grant Performance Measures Template in FY 2009. July 2008. US EPA Office of Congressional and Intergovernmental Relations, Office of Grants and Debarment, and Office of Planning, Analysis and Accountability. Available at [http://www.epa.gov/performance/pdfs/2009\\_state\\_grant\\_template.pdf](http://www.epa.gov/performance/pdfs/2009_state_grant_template.pdf)

National Environmental Performance Partnership System. OMB's concerns include ensuring clear linkages to EPA's Strategic Plan (strategic goals, objectives/sub-objectives, and strategic measures), providing consistent requirements for performance reporting and allowing for within-state comparisons of planned and past activities and performance.

Under the approach being tested by the pilots, certain essential elements would have to be clearly identified in a state CEP grant workplan, including:

1. Linkage to EPA's Strategic Plan, down to the objective/sub-objective header level where possible (may include multiple goals, objectives/sub-objectives).
2. Planned accomplishments (i.e., activities and commitments/outputs/outcomes).
3. Related EPA/state measures (at a minimum those identified as SGTMs).

This approach will incorporate performance information into the grant workplans themselves, rather than requiring a separate attachment. States participating in the pilots in FY 2009 are not required to complete the template for those grants included in the pilot. After completion of the pilots, EPA and the states will work together to determine if the identification of the essential elements in the workplan and subsequent reporting of results in the grant work file is an improvement and/or a viable alternative to the template approach.

## NEXT STEPS

- NS1. **This is the most important next step as it drives all that follow: Clarify the goals of the SGTm process and evaluate alternative approaches to achieve them.** Look at the standardized measures that are used across states and in other federal agencies and discuss possibly using a different process that includes using different measures for states. If changes are needed, assess whether potential management benefits (e.g., for new measures) justify additional burden. Consider the impacts of alternative measures/methodologies or approaches on the ability to reach the goals identified.
- NS2. **Develop and evaluate options for presenting state results** (SGTM or alternative approach) in the FY 2009 standardized work plan pilot, as an alternative to the separate template of measures attached to workplans.
- NS3. **Manage data more effectively and efficiently.** Establish a process for EPA (national and regional) and state offices to collaborate in the development, management, and improvement of state grant program reporting information. This work should start with the development and implementation of data standards after the goals are completed and data is identified. All processes should be complimentary to and integrated with grants processes and documentation.
- NS4. **Continue to improve the accessibility and transparency of data for all stakeholders.** Make EPA's Measures Central the complete repository for measurement information, including state results, caveats, and narratives. Incorporate highlights of annual state results to feature effective state programs and best practices in EPA annual performance and accountability reports. Develop/display data on EPA's website to share results and best practices.

- NS5. **Continue to improve communications** within and between EPA headquarters and regional staff and state staff regarding grant procedures, performance and evaluation or results. **Clarify/specify roles and responsibilities** for the implementation of the SGTM process or other alternatives.

## APPENDIX 1: FY 2007 STATE GRANT TEMPLATE MEASURE (SGTM) REPORTING WORKGROUP

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## **APPENDIX 2: OBSERVATIONS AND LESSONS LEARNED FOR EACH STATE GRANT PROGRAM**

*Observations and lessons learned below were written exclusively by National Program Manager offices without input from other agencies and states.*

### **State and Local Assistance for Clean Air Act Section 105**

For the § 105 continuing air grant program, the purpose of the grant template was to highlight higher level environmental outcomes and key tasks carried out by the recipients that contribute to those outcomes. These 10 measures supplement the approximately 40 annual commitments and activity measures that currently help gauge short-term progress in the program. Reflecting PART agreements reached with OMB, the outcome measures adequately reflect aggregate performance at the national level but only a handful differentiate recipient-specific results. Data lag and quality assurance have meant that only one year of results has been obtained and this is probably not enough time to determine whether the current national-level measures meet OMB's expectations or how they impact EPA's ability to manage the program. Additionally, given the data lag concern, one area for further inquiry by EPA and recipients is whether short-term air quality measures or non-commitment indicators can be developed that can better align with a recipient's grant work program period of performance and with key Agency planning and reporting processes.

### **Indoor Radon**

Due to the voluntary nature of state programs, the performance information produced for the radon data sets is not uniform and state-by-state information cannot be aggregated nationally. Accordingly, EPA relies upon national-level data to assess overall program performance. EPA is developing an environmental indicator measure of performance, but will likely use national data for this measure. EPA is continuing to consider other approaches to the administration of the state grant programs that would promote more consistent performance measurement across the states and that could eventually link to a national level indicator of performance.

### **Toxic Substances Compliance (Lead and PCB/Asbestos)**

The measures for this program provide useful data in terms of quantifying state program outputs — numbers of inspections and enforcement actions — but do not fully demonstrate the impact of these activities on reducing lead paint hazards or elevated blood lead levels in children. States must typically supplement grant funding with state money to reach targets for state compliance and enforcement outputs negotiated in the grants. As state resources continue to decline and states are less able to supplement EPA grant dollars, the number of annual grant outputs will more accurately reflect what was accomplished with EPA grant dollars alone.

### **Pesticides Enforcement**

OECA says their measures are not integrated into the grant's annual accomplishment reports submitted to the Agency, and are not good measures of overall grant activity.

OECA runs into difficulty in developing standardized measures across states because of different state regulatory schemes and inconsistencies in definitions and methodologies for data collection



and reporting. OECA proposes to drop three SGTMs in favor of a single inspection based measure that better tracks with our TSCA Grant Enforcement Program: “Total number of inspections by each grantee,” which would have a set of specific criteria each state understands.

### **Lead-Based Paint Risk Reduction Abatement**

The measure for this program focuses on the number of certified individuals in a state engaged in lead-based paint abatements and does not address the certification program as a whole. Thus, this is not an effective measurement of the overall state program. OPPT suggests maybe automating the state certification process to reduce data lags and long-term costs to managing the program.

### **Pesticides Program Implementation**

The “annual number of certified pesticide applicators” is helpful to understand how each state performs under the program, but state comparisons are misleading because there are too many factors causing variability in the state data that cannot be controlled. For example, the percentage of the state certification program funded by the federal contribution varies widely among states; states have different levels of agricultural production, pest issues, costs to obtain certification, and regulatory requirements for certification; and, the number of certified pesticide applicators is based more on market demand.

Improvements would require more tracking and additional measures to capture different aspects of the grant performance, and possibly more burden on the states.

### **Hazardous Waste Financial Assistance**

The measures address core state permitting and corrective action activities under the purview of OSWER, but as with other programs, the grant also funds enforcement and compliance activities, which are not captured or reported by the measures. Performance results are generally reflective of annual grant funding levels.

### **Brownfields (CERCLA Section 128)**

OSWER’s Brownfields measures provide a standard way of capturing site-specific annual cleanups conducted by States with EPA funding. The measures are clear and consistent.

### **Underground Storage Tanks**

The Spill, Overfill, and Corrosion (ST6) measure is helpful in assessing state performance and targeting areas for improvement. Again, as with other programs, it is insufficient by itself to understand the accomplishments of the grant. Two new measures should be added to measure confirmed releases and cleanups continued, which are measures used to meet GPRA goals. These two measures better capture work of the grant program as a whole, with no additional reporting burden. (Note: three new measures are proposed for 2010).

### **Pollution Control (Clean Water Act Section 106)**

The measures are helpful in assessing program performance at the state level, but EPA’s water program is investing in efforts to improve outcome measures of environmental success. Several Regions are undertaking pilot efforts with various internal and external partners. OW wants to streamline the set of 20 measures in FY 2010.

## **Non-point Source (NPS) Pollution Control (CWA Section 319)**

The measure is one way of assessing overall success of state 319 programs, but there are many other state, federal, and local agencies that are influential in funding and implementing NPS projects and not covered under the grant. The NPS program has very detailed guidance in developing NPS (WQ-16) success stories and each story is reviewed by the state, EPA region, and headquarters before it is posted to the NPS website.

## **Beaches Protection**

The measures are very helpful in assessing program performance. They directly correspond to the grant objective/purpose, and accurately reflect accomplishments. However, the measures do not capture specific events that would lead to fewer beach closures, like controlling sewer overflows, and BEACH grant funds may not be used to fund activities to minimize overflows.

## **Public Water System Supervision (PWSS)**

The PWSS measures are helpful in assessing the performance of state programs because they accurately reflect the grants objective, to ensure the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards. However, there may be little correlation between dollars and annual results (e.g., this year's money does not necessarily equal this year's accomplishments). There is no restriction placed upon the time permitted to spend the annual award. Funds are available until expended. Many of OW's grants involve multiyear funding and results are cumulative.

## **Underground Injection Control (UIC)**

The Federal allocations in all UIC programs are for a variety of program well/subwell classes and associated activities (e.g., permitting, inspections, reporting, etc.). In most cases, the state overmatches the Federal dollars in order to run an effective program. The UIC measures have been helpful in assessing state performance results. One measure, in particular, SD-10 (Percent of identified Class V Motor Vehicle Waste Disposal wells that are closed or permitted (cumulative)), is in the grant workplan, links to the grant objective/purpose, and incorporates reporting milestones set with EPA input.

No changes are suggested to improve the measures and best practices may be available.