



### **OFFICE OF INSPECTOR GENERAL**

## Controls and Oversight Needed to Improve Administration of EPA's Customer Service Lines

Report No. 13-P-0432

**September 26, 2013** 



**Report Contributors:** 

Michael D. Davis Jennifer Hutkoff Yeon Kim

Heather Layne

Vanessa Rodriguez-Moya

#### **Abbreviations**

BAC Business Assistance Center CSLs Customer Service Lines

EPA U.S. Environmental Protection Agency

FTEs Full-Time Equivalents

FY Fiscal Year

GAO Government Accountability Office

GPRA Government Performance and Results Act

IRIS Integrated Risk Information SystemNLIC National Lead Information CenterNPCD National Program Chemicals Division

NRC National Response Center

OEI Office of Environmental Information

OIG Office of Inspector General

SEMS Superfund Enterprise Management System

SRC Superfund Reporting Cube

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## At a Glance

#### Why We Did This Review

The U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), sought to determine whether the EPA has controls in place to ensure that its help desks, hotlines and clearinghouses are operating in an efficient and effective manner. Members of the public and other interested individuals searching the EPA's website for a telephone number to call for help with an environmental problem can find dozens of different help desks, hotlines and clearinghouses.

## This report addresses the following EPA themes:

- Making a visible difference in communities across the country.
- Expanding the conversation on environmentalism.
- Working toward a sustainable future.

For further information, contact our public affairs office at (202) 566-2391.

The full report is at: www.epa.gov/oig/reports/2013/ 20130926-13-P-0432.pdf

## Controls and Oversight Needed to Improve Administration of EPA's Customer Service Lines

#### **What We Found**

The EPA has a variety of resources—including telephone hotlines, Web clearinghouses, and other online reference information—which the OIG has categorized as customer service lines (CSLs). The EPA's 41 external CSLs reviewed have oversight practices that vary according to the emphasis placed on monitoring, evaluating success, and providing accurate information to the public. There are no specific EPA or governmentwide guidances or standards for operating and managing CSLs. Without guidance or procedures to ensure consistent oversight of CSLs, there is limited assurance that the approximately \$5.7 million of funds used to operate 30 of the CSLs in fiscal year 2011 achieved the desired results (cost not available for 11 CSLs).

CSL information on the agency's website is incomplete. The agency lacks specific guidance regarding the identification, presentation and management of CSL information on the Web. As a result, the quality of customer service is negatively affected. In addition, the EPA's regions and program offices do not properly identify, present and manage CSL information on the Web; therefore, customers using the Internet may not be able to access relevant environmental information in a timely manner.

### **Recommendations and Planned Agency Corrective Actions**

We recommend that the EPA's Deputy Administrator develop agencywide guidance for the monitoring and oversight of EPA CSLs, and review external CSLs to determine their cost efficiency. We also recommend that the Deputy Administrator develop guidance for the identification, presentation and management of CSL information on the Internet.

The EPA agreed with the draft report's message that the agency needs to consider an appropriate policy response to improve the administration of CSLs. The agency is seeking input from the assistant, associate and regional administrators in order to develop and implement necessary improvements. We agree with the agency's actions; however, milestone dates for the development of the policy and improvements of CSLs are needed. As a result, the recommendations are unresolved.

### **Noteworthy Achievements**

CSLs in some regions were effectively consolidated. For instance, all of Region 2's citizen complaints are consolidated into its headquarters citizen complaint database, regardless of how the complaints were received by the region. To combine resources, Region 3 has consolidated its Regional Public Information Center into an existing contract that includes the region's library, hotline, legal library and Superfund records room. To avoid the administrative burden associated with awarding and managing two contracts instead of one, the EPA plans to consolidate the operations of the Toxic Substances Control Act Hotline and the "Lead Hotline" of the National Lead Information Center.



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

THE INSPECTOR GENERAL

September 26, 2013

### **MEMORANDUM**

**SUBJECT:** Controls and Oversight Needed to Improve

Administration of EPA's Customer Service Lines

Report No. 13-P-0432 athy a. Elkil,

FROM: Arthur A. Elkins Jr.

TO: **Bob Perciasepe** 

Deputy Administrator

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit-resolution procedures.

### **Action Required**

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 60 calendar days. You should include planned corrective actions and completion dates for all unresolved recommendations. Your response will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public. If your response contains such data, you should identify the data for redaction or removal, along with corresponding justification. We will post this report to our website at http://www.epa.gov/oig.

If you or your staff have any questions regarding this report, please contact Richard Eyermann, acting assistant inspector general for the Office of Audit, at (202) 566-0565 or evermann.richard@epa.gov, or Michael Davis, director of Efficiency Audits, at (513) 487-2363 or davis.michaeld@epa.gov.

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# **Chapter 1**Introduction

### **Purpose**

The U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), sought to determine whether the EPA has controls in place to ensure that its help desks, hotlines and clearinghouses are operating in an efficient and effective manner. Members of the public or other interested individuals searching the EPA's website for a telephone number to call for help with an environmental problem can find dozens of different help desks, hotlines and clearinghouses.

### **Background**

The OIG has categorized the EPA's telephone hotlines, resource information provided through clearinghouses on the Web, and other online reference information provided to the public as customer service lines (CSLs). Members of the public or other interested individuals searching the EPA's website for reference information or a telephone number to call for help with an environmental problem can find dozens of different CSLs, ranging from the Acid Rain Hotline to the Wetlands Information Hotline, to the EPA's grants and fellowships online information.

The EPA's hotlines are operated by employees, contractors, or partner agencies. Times of operation vary from 24 hours per day, 7 days per week, to only during regular business hours. Stakeholders who call hotlines will get an immediate response to their concerns, or they can leave a message.

Clearinghouses offer information to stakeholders, usually as resource information, online information, or as data on specific topics defined by the EPA. Clearinghouses are operated by EPA employees and contractors.

The EPA has also partnered with entities such as the country of Mexico, universities, and other federal agencies such as the U.S. Department of Transportation to provide environmental information to the public.

### **Noteworthy Achievements**

CSLs in some regions were effectively consolidated. For instance, all of Region 2's citizen complaints are consolidated into its headquarters citizen complaint database, regardless of how the complaints were received by the region.

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To combine resources, Region 3 has consolidated its Regional Public Information Center into an existing contract that includes the region's library, hotline, legal library, and Superfund records room.

To avoid the administrative overburden inherent in awarding and managing two contracts instead of one, in 2013 the EPA plans to consolidate the contract operations of the Toxic Substances Control Act Hotline and the "Lead Hotline" of the National Lead Information Center (NLIC). Both hotlines will have the same management controls, and the same person will oversee both CSLs. The two hotlines are currently administered by the same contractor under two separate contracts.

### **Scope and Methodology**

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our review objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We performed the audit from July 2012 through July 2013. We reviewed fiscal years (FYs) 2011 and 2012 Federal Managers' Financial Integrity Act Assurance letters from the EPA's Office of Environmental Information (OEI), Office of the Administrator, and Office of the Chief Financial Officer. We determined whether those letters identified any weaknesses related to controls for managing help desks, hotlines and clearinghouses. The letters did not identify any such weaknesses.

We also reviewed the following laws, memorandums, executive orders, and plans to obtain an understanding of the overarching principles that can be applied to the management and operation of CSLs:

- E-Government Act of 2002.
- Transparency and Open Government, January 2009.
- FY 2011–FY 2015 EPA Strategic Plan.
- Presidential Memorandum, *Accountable Government Initiative*, September 2010.
- Executive Order 13571—Streamlining Service Delivery and Improving Customer Service, April 2011.
- Executive Office of the President, Memorandum M-11-24, Implementing Executive Order 13571 on Streamlining Service Delivery and Improving Customer Service, June 2011.
- Executive Order 13576—Delivering an Efficient, Effective, and Accountable Government, June 2011.

- Government Performance and Results Act (i.e., GPRA Modernization Act of 2010).
- The EPA's Customer Service Plan, December 2011.

We reviewed the EPA's *Web Content Types and Review Procedure* to better understand the governance of the agency's Web topics, and reviewed the EPA's *Contracts Management Manual* to obtain an understanding of the contract requirements for CSLs.

We performed the following steps to select samples of CSLs for review, and to determine the extent of the EPA's management of customer service lines:

- Reviewed and determined the CSLs available to the public on the EPA's website.
- Obtained a listing of the CSLs under the authority of the EPA regions and program offices.
- Reconciled CSLs on the EPA's website to ones provided by the regions and program offices.
- Determined the costs of the CSLs that were not listed on the website.
- Analyzed information provided by the regions and program offices to determine whether the agency:
  - o Monitors CSLs.
  - o Ensures accuracy of information provided to the public.
  - o Evaluates the success of CSLs.
  - o Considers consolidation.
- Determined volumes of activity and costs to operate CSLs. We calculated the CSL cost per inquiry by dividing annual cost by the annual volume, based on the information that the EPA provided for FY 2011:
  - Annual costs of a CSL—most CSL costs were provided by fiscal year, but some CSLs simply stated the cost annually.
  - Volume unit of inquiries vary (e.g. telephone calls, emails, websites access).
- Interviewed Web content coordinators to determine the cause of data inconsistencies.
- Interviewed staff responsible for managing CSLs to determine how they monitor and evaluate CSLs, and to ensure that accurate information is provided to the public.

### **Prior Reports**

On November 10, 2009, the OIG issued Project No. 10-P-0027, Congressionally Requested Inquiry into EPA's Response to a Report of a Leaking Well in North Carolina and the National Response Center Hotline. We reported that EPA's Region 4 emergency hotline is programmed to forward all incoming calls during nonworking hours to the National Response Center (NRC) telephone system, which is staffed at all times. Operated by the U.S.

Coast Guard, the NRC is the sole national point of contact for reporting all oil, chemical, radiological, and biological discharges into the environment. The OIG found that the NRC received voicemails about the leaking North Carolina well, but NRC staff took no actions to inform the EPA about those calls. Our findings were presented to the U.S. Department of Homeland Security's Office of Inspector General for action.

We also reviewed findings from the U.S. Government Accountability Office (GAO) through Report No. GAO-06-270, Federal Contact Centers:

Mechanism for Sharing Metrics and Oversight Practices along with Improved Data Needed, February 2006. The report found that mandating specific guidance and increased sharing of successful practices for managing contact centers may help agencies improve their ability to write and oversee contracts for these centers, and avoid needless duplication of effort.

## **Chapter 2**

## Agency Administration of Customer Service Lines Lacks Consistency

To maximize efficient customer service and achieve outcomes, the EPA needs consistent administration of CSLs. The EPA's 41 external CSLs reviewed have oversight practices that vary according to the emphasis placed on monitoring, evaluating success, and providing accurate information to the public. When CSLs are administered by a contractor, the EPA uses the contract statement of work to oversee contractor activities. However, when CSLs are administered by EPA staff, there is no specific guidance available for the operating, oversight and management of CSLs.

Federal initiatives such as the 2002 E-Government Strategy and Executive Order 13571 provide overarching principles that can be applied to the management and operations of CSLs. Without guidance or procedures in place to ensure consistent oversight of CSLs, there is limited assurance that the approximately \$5.7 million of funds used to operate 30 of the CSLs in FY 2011 achieved the desired results (cost not available for 11 CSLs).

## Federal Law, Initiatives and Executive Order Provide Overarching Principles for CSL Management and Operation

The federal law, initiatives and executive order noted below provide overarching principles that can be applied to CSL management and operations.

The President's 2002 E-Government Strategy identified a governmentwide initiative that addresses the elimination of redundant systems and improving the government's quality of customer service for citizens and businesses.

Executive Order 13571, Streamlining Service Delivery and Improving Customer Service (April 2011), states that the public deserves competent, efficient and responsive service from the federal government. In addition, this order requires executive departments and agencies to continuously evaluate their performance in meeting this standard and work to improve it. Specifically, Section 2 of Executive Order 13571 details the following requirements:

 Section 2 (c) requires agencies to set clear customer service standards and expectations, including, where appropriate, performance goals for customer service required by the GPRA Modernization Act of 2010 (Public Law 111-352).

- Section 2 (d) requires agencies to improve the customer experience by adopting proven customer service best practices and coordinating across service channels (such as online, and via telephone, in-person, and mail services).
- Section 2 (e) requires agencies to streamline processes in order to reduce costs and accelerate delivery, while reducing the need for customer calls and inquiries.
- Section 2 (f) requires the identification of ways to use innovative technologies to accomplish the customer service activities above; thereby lowering costs, decreasing service delivery times, and improving the customer experience.

The GPRA Modernization Act of 2010 has a section that outlines certain requirements for agency performance plans. Specifically, Section 3 (b)(6) requires that agencies establish a balanced set of performance indicators to be used in measuring or assessing progress toward each performance goal; including, as appropriate, customer service, efficiency, output, and outcome indicators.

The EPA's *Contracts Management Manual* outlines the requirements for management of contracts. Section 11.1.4 says the statement of work is the central part of the procurement. The statement of work is a written description of the contractual requirements for supplies or services that the government requires from the contractor. It delineates the tasks, describes essential technical needs or requirements that the contractor must fulfill, provides the schedule the contractor must meet, sets forth required deliverables, and provides the standards that the government will use to determine that the requirements have been met.

#### Inconsistent Administration of CSLs

The EPA's 41 external CSLs reviewed have oversight practices that vary according to the emphasis placed on monitoring, evaluating success, and providing accurate information to the public.

### Monitoring

While EPA monitors 34 of 41 CSLs (82.93 percent) (appendix B-1), the methods used by contractors and the EPA staff vary widely (table 1; and appendices B-2 and B-3).

Table 1: CSLs administered by contractors and EPA staff

Monitoring of contractor operated CSLs					
	No. of CSLs	Being monitored? Y/N	Percentage to 20 or 21 CSLs		
	21	Y	100.00%		
Subtotal	21	-	100.00%		
	Monito	oring of CSLs by EPA	staff		
	13	Y	65.00%		
	7	N	35.00%		
Subtotal	20		100.00%		
Total 41					

Source: OIG analysis of the EPA's response to the OIG questionnaire. See appendices B-2 and B-3.

### CSLs Operated by Contractors

The EPA uses contractors to operate 21 out of 41 CSLs and monitors the inquiries of those 21 (appendix B-2). When a contractor is involved, the monitoring methods used by EPA vary. Monitoring methods include:

- Customer satisfaction surveys.
- Monthly reports for tracking and monitoring, statistics and trends, deliverable reporting, service-level agreements, and system reporting.
- Metrics for answering and responding to calls.

### Example of the EPA Monitoring a Contractor-Operated CSL

The agency's NLIC is administered by a contractor. The purpose of the NLIC is to answer the public's questions about lead poisoning prevention and to distribute technical information. The National Program Chemicals Division (NPCD) of the Office of Chemical Safety and Pollution Prevention monitors the NLIC using the following methods:

- Contractor's weekly, monthly and annual reports.
- Emails between the NPCD's project officer and the contractor.
- Anonymous telephone calls from the NPCD to the hotline to test the accuracy of information provided by the contractor.

### CSLs Operated by EPA Staff

EPA staff operates 20 of 41 CSLs and uses various methods to monitor CSL activities. Examples include:

- Complaint follow-ups by media enforcement branches.
- Call logs.
- Performance standards of hotline staff.
- Tracking systems.

### Example of the EPA Monitoring a Staff-Operated CSL

Region 3's Business Assistance Center (BAC) hotline is administered by EPA staff. The purpose of the Region 3 BAC is to help small- and medium-sized businesses achieve environmental compliance. Region 3 monitors the operation of its BAC through:

- Hotline staff performance standards.
- Volume of calls.
- Response time.

### CSLs That Are Not Formally Monitored

The activities for seven of the 20 CSLs were not formally monitored (appendix B-3).

### **Evaluating Success**

The EPA did not evaluate the success for 31 (75.61 percent) of the 41 CSLs reviewed (appendix C). When the EPA evaluated the success of 10 CSLs, varying and limited methods and several different criteria were used, including:

- Reports that provide statistics on: 1) value-added telephone calls, telephone transfers, email responses, visitors, and publications mailed;
   2) the amount and kind of requests received, when they were received, and when a response was provided; and 3) the number of spill notifications received.
- Tracking follow-up by media enforcement branches to complaints received.
- Metrics on tracking hotline usage.
- Analyses of costs, tasks and open tickets.
- Assistant administrator's program review and status reports.
- Surveys to rank user satisfaction, the reference desk, and support/customer service.

### Example of a CSL for Which the EPA Evaluates Success

The EPA's Integrated Risk Information System (IRIS) is a centralized repository of information that the public can use to obtain information on chemicals in the IRIS database and chemicals currently undergoing IRIS assessment. To evaluate the success of the IRIS hotline, reports produced on a monthly, quarterly, and fiscal-year basis provide statistics on requests received.

#### CSLs Not Evaluated for Success

The EPA does not evaluate the success for 31 CSLs. Comments returned from operators of those non-evaluating CSLs provided the following feedback about evaluating success:

- No such analysis or metrics are used. No funding is available.
- There have been no studies performed to analyze or evaluate the management and/or success of the hotline.
- The success of a hotline call is gauged by anecdotal feedback.

### **Providing Accurate Information**

Of the 41 CSLs reviewed, 33 (80.49 percent) monitored the accuracy of information provided to the public and stakeholders (appendix D). However, the methods used to monitor accuracy vary and include:

- Analyses and metrics.
- Customer responses.
- Meetings and routine discussions.
- EPA technical experts.
- Reports.

Example of a CSL for Which the EPA Monitors the Accuracy of Information Provided

The purpose of the EPA's Superfund Enterprise Management System (SEMS) Reference Desk is to provide customer support for the applications that make up the systems integration project for the Office of Superfund Remediation and Technology Innovation. The SEMS Reference Desk also provides support for external customers by handling Freedom of Information Act requests and information request line inquiries.

The SEMS Reference Desk follows up with customers to ensure their issues or questions have been addressed and to notify them if follow-up retesting is needed. These contacts with customers are also recorded in the SEMS User Request System. The Superfund Reporting Cube (SRC) also sends out a link to a survey after the SRC completes a customer's request.

The survey ranks the accuracy of response and the customer service provided by the SRC.

CSLs for Which the EPA Does Not Monitor the Accuracy of Information Provided

For eight CSLs that did not monitor to ensure the accuracy of information, the EPA provided the following responses to the question: "Are there any analyses and/or metrics used to ensure information given to customers from the help desks, hotlines, and clearinghouses is accurate and that good customer service is provided?"

- There are no analyses and/or metrics used to track the accuracy of information.
- Funding is at the absolute lowest level possible and no resources can be spared to generate this information.
- We do not send a survey to requestors asking for feedback/evaluation of our assistance in obtaining library materials.
   We do get some unsolicited responses thanking us for our help, but nothing is prepared or solicited following a routine or structured format.

### High Dollar Value Assigned to the Overall Operation of CSLs

Based on the EPA's data, the cost to operate 30 of the 41 CSLs in FY 2011 was approximately \$5.7 million (table 2 and appendix E-1). The highest cost per inquiry is for CSLs operated by contractors. The lowest cost per inquiry is for the CSLs operated by EPA staff (appendices E-2 and E-3).

The 41 CSLs handle approximately 367,586 inquiries annually. Table 2 shows that 38 of the 41 CSLs provided the volume of inquiries handled annually; three did not. The CSLs operated by contractors showed a higher volume of activity (87.03 percent) (appendix E-4). The CSLs operated by non-contractors showed a lower volume of activity (12.97 percent) (appendix E-5).

We were unable to determine the costs per inquiry for 13 of the 41 CSLs. For eight of the CSLs, the EPA provided only full-time employees and senior environmental employees. For two of the CSLs, the EPA provided no cost data. For two of the CSLs, the EPA did not provide volume data. For one CSL, the EPA provided neither volume nor costs data. The overall operational cost of the EPA's CSLs in FY 2011 would have been higher had all CSL operators returned cost information to us.

Table 2: Costs of CSLs operated by contractors and non-contractors

Description	No. of CSLs	Volume per year FY 2011	Percentage of volume	FY 2011 cost	Percentage of cost				
Co	Costs of 21 CSLs operated by contractors								
CSLs provided volume and costs	19	319,901	87.03%	\$ 4,348,901	75.74%				
CSLs no volume provided	2	Not provided	N/A	953,650	16.61%				
Subtotal CSLs operated by contractors	21	319,901	87.03%	5,302,551	92.35%				
Co	sts of 20	CSLs non-contr	actor operated						
CSLs provided volume and costs	9	19,071	5.19%	\$439,478	7.65%				
CSLs provided SEEs and FTEs, not costs	8	27,698	7.53%	Not provided	N/A				
CSLs no costs provided	2	916	0.25%	Not provided	N/A				
CSL provided neither volume nor costs	1	Not provided	N/A	Not provided	N/A				
Subtotal CSLs operated by non-contractors	20	47,685	12.97%	439,478	7.65%				
Total	41	367,586	100.00%	\$ 5,742,029	100.00%				

Source: OIG analysis of the EPA's response to the OIG questionnaire.

### Conclusion

The EPA is spending approximately \$5.7 million to operate 30 of 41 external CSLs. Without guidance to ensure the agency has procedures in place to ensure consistent administration of CSLs, there is limited assurance that the agency wisely spends government funds.

### Recommendations

We recommend that the Deputy Administrator:

- 1. Develop agencywide guidance for the monitoring and oversight of the agency's CSLs.
- 2. Review the EPA's external CSLs to determine their cost efficiency.

### **Agency Comments and OIG Evaluation**

The EPA agreed with the draft report's message that the agency needs to consider an appropriate policy response to improve the administration of CSLs. The agency is seeking input from the assistant, associate and regional administrators in order to develop and implement necessary improvements.

The EPA stated that the administrative policy for CSLs is not a current, ongoing function of the Office of the Administrator, and the agency acknowledged the OIG for recognizing this and recommending such policy now. The agency further stated that consideration of any policy must be supported by information, analysis and experiences of the numerous EPA offices with direct responsibility for CSLs. Accordingly, the agency sent a memorandum to all assistant, associate and regional administrators asking them to respond by September 18, 2013, to a request for information to prepare an appropriate and informed response to the significant issues raised by the OIG. After the information is received, the agency will develop and implement the necessary improvements to the EPA's administration of CSLs and their Web presence.

The OIG agrees with the agency's actions; however, milestone dates are needed for the development of the policy and improvements of CSLs.

## **Chapter 3**

# **Customer Service Line Information** on the Agency's Website Is Incomplete

CSL information on the agency's website is incomplete. Eighteen of the EPA's CSLs with information available to the public were not listed on the agency's "Hotlines and Clearinghouses" (<a href="www.epa.gov/epapages/epahome/hotline.htm">www.epa.gov/epapages/epahome/hotline.htm</a>) Web page, which had information on 44 external CSLs. In addition, the agency did not provide any information about 18 of 44 of the CSLs listed on the Web page. Initiatives such as the 2009 *Transparency and Open Government* presidential memorandum and the EPA's *FY 2011-2015 Strategic Plan* provide overarching principles that encourage the public's access to Web-based customer service information.

However, the agency lacks specific guidance regarding the identification, presentation and management of CSL information on the Internet. As a result, the quality of customer service is negatively affected. The EPA's regions and program offices also do not properly identify, present and manage Web-based CSL information to customers; therefore, customers using the Internet may not be able to access environmental information in a timely manner.

## Federal Initiatives and EPA Policies Encourage Simple and Swift Access to CSL Information

A number of federal initiatives encourage access to customer service information. The January 21, 2009, presidential memorandum entitled *Transparency and Open Government* states:

Transparency promotes accountability and provides information for citizens about what their Government is doing...
[Government will] take appropriate action, consistent with law and policy, to disclose information rapidly in forms that the public can readily find and use. Executive departments and agencies should harness new technologies to put information about their operations and decisions online and readily available to the public.

According to the EPA's *Web Content Types and Review Procedure*, the EPA's website is a fundamental communication tool for every agency program and region. With the fast-paced growth of the EPA's website, effective management of information is essential. Distinguishing content types and identifying appropriate review schedules are critical to keeping the website current. Otherwise, website visitors may have difficulty locating information or determining what information accurately describes current EPA policy decisions and activities.

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According to the EPA's *FY 2011-2015 Strategic Plan* cross-cutting strategy— "Expanding the conversation on environmentalism"—the EPA will build stronger working relationships throughout the country, particularly with tribes, communities of color, economically distressed cities and towns, young people, and others. To accomplish this strategic plan goal, the EPA will:

- Educate and empower individuals, communities, and agency partners in decision-making through public access to environmental information and data.
- Address barriers to improve engagement with historically underrepresented sectors of the nation.
- Use traditional and new media to inform and educate the public about agency activities and provide opportunities for community feedback.
- Encourage citizens to understand the complexities and impacts of environmental issues and environmental stewardship, and provide avenues and tools that enhance their ability to participate in processes that could affect them.

### **EPA Is Not Aware of Its Overall CSL Universe**

As of October 2012, the "Hotlines and Clearinghouses" Web page on the EPA's national website contained information on 44 external CSLs. When requested, the agency did not provide information regarding 18 (one region and 17 headquarters program offices and non-EPA offices) of the 44 CSLs listed (see appendix F). Since each program office and region is responsible for managing its CSLs, the EPA is not aware of its overall CSL universe. The EPA's Web content coordinator explained that the agency most likely did not provide the information because the EPA was unable to specifically identify certain CSLs as such. The Web content coordinator also said the agency needs to take a closer look at all of its website content to specifically identify whether the content is actually related to CSLs. For example, the agency might want to create commonly understood definitions for hotlines and clearinghouses.

The agency also provided the OIG with information on 21 other external CSLs (12 regions and 9 headquarters program offices) that were not listed on the "Hotlines and Clearinghouses" Web page. The agency provided cost information for 13 of the 18 external CSLs. In FY 2011, costs for operating those 13 CSLs were approximately \$835,403 (appendix G-1).

Other than Region 10, the EPA's "Hotlines and Clearinghouses" Web page did not list regional CSL information. The EPA's regions assumed that the intent of Web page was to list external CSLs that only had a national focus. However, no further explanation was provided concerning why Region 10 was on the Web page and other regions were not. The agency did provide information that showed 12 external CSLs being operated in various regions (table 3).

Table 3: Regions with external CSLs excluded from the national Web page

Region	No. of external CSLs
Region 1	1
Region 2	3
Region 3	4
Region 6	1
Region 7	2
Region 8	1
Total	12

Source: Information provided by EPA regions.

## Guidance Is Needed for the Identification, Presentation and Management of the Agency's CSL Information on the Web

The agency lacks specific guidance regarding the identification, presentation and management of CSL information on the Web. Classification of CSLs (such as defining hotlines and clearinghouses) is not clear. Access paths to CSLs on the EPA's national and regional Web pages vary. The promotion of regional CSLs on the "Hotlines and Clearinghouses" national Web page is also unclear. One region stated that the understanding was that putting things on the "Hotlines and Clearinghouses" Web page was a national program responsibility rather than a regional activity, and that the page appeared to focus on addressing national issues instead of regional issues.

The EPA also lacks a specific Web page content-review structure for CSLs. Interview responses varied when asked, "How are things removed from the EPA's 'Hotlines and Clearinghouses' Web page?" One agency staff member said the program office would remove items upon request. Another staff member said the person managing the hotline is entrusted with determining whether updates are needed or information should be removed. A third staff member said removing content from the website is the responsibility of the Web content coordinator.

In December 2012, the EPA's national Web infrastructure manager said the agency had deleted the link from its home page to the national "Hotlines and Clearinghouses" Web page due to the fact that so many of the links on the hotline page were broken. Agency staff said data elements from the "Hotlines and Clearinghouses" Web page are now available on the agency's "A–Z Index" page. Our search of EPA program office hotline information through the "A–Z Index" Web page (<a href="http://www.epa.gov/epahome/quickfinder.htm">http://www.epa.gov/epahome/quickfinder.htm</a>) revealed that information on hotlines is not always mentioned on program office pages. Of the 10 topic areas reviewed, hotline information was easily found on only four of the program office Web pages (table 4).

Table 4: Hotline information mentioned on program office Web page

Topic	Yes/No
1. Acid Rain	No
2. Lead	Yes
3. Radon	Yes
4. Superfund	No
5. Pesticides	Yes
Drinking Water	Yes
7. Ambient Monitoring Technology Information Cent	ter No
Center for Exposure Assessment Modeling	No
Emission Measurement Center	No
10. Energy Star	No

Source: OIG analysis of information on www.epa.gov/epahome/quickfinder.htm.

As of January 2013, two out of 12 of regional CSLs identified by the EPA are not readily available to the public using regional websites (appendix G-2). We found that each regional site contains a "Contact Us" link, which takes EPA stakeholders to regional CSL contact information. However, not every regional website otherwise hosts the same type of information. For example, Region 4 contained an easy-to-access directory of Region 4 offices and division telephone numbers, in addition to emergency contacts and state agency telephone numbers. Other region's websites only contained the main telephone numbers for their respective regions. All regional websites contained at least one CSL number readily available to the public.

#### Conclusion

Information currently available on the agency's website does not reflect complete and relevant information concerning CSLs administered by the agency. In December 2012, the EPA deleted the "Hotlines and Clearinghouses" link from its home page, which made CSL information less accessible to the public. The EPA's Web pages are currently undergoing reconstruction. This presents an opportunity to develop and implement a plan concerning what CSL information should be available to the public and where access to information should be located. Public access to environmental information fosters awareness and results, and the EPA should continuously work to improve access to this information.

### Recommendation

We recommend that the Deputy Administrator:

- 3. Develop guidance for the identification, presentation and management of CSL information on the Web to include, but not be limited to:
  - a. Providing information to the public that is complete, accurate, readily available, and consistent across the EPA's program offices and regions.
  - b. Clearly defining the terms and categories of various types of CSLs available to the public.

### **Agency Comments and OIG Evaluation**

The EPA agreed with the draft report's message that the agency needs to consider an appropriate policy response to improve the administration of CSLs. The agency is seeking input from the assistant, associate and regional administrators in order to develop and implement the necessary improvements.

The OIG agrees with the agency's actions; however, milestone dates are needed for the development of the policy and improvements of CSLs.

### Status of Recommendations and Potential Monetary Benefits

#### RECOMMENDATIONS

POTENTIAL MONETARY BENEFITS (in \$000s)

Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	11	Develop agencywide guidance for the monitoring and oversight of the agency's CSLs.	U	Deputy Administrator			
2	11	Review the EPA's external CSLs to determine their cost efficiency.	U	Deputy Administrator			
3	17	Develop guidance for the identification, presentation and management of CSL information on the Web to include, but not be limited to:	U	Deputy Administrator			
		Providing information to the public that is complete, accurate, readily available, and consistent across the EPA's program offices and regions.					
		b. Clearly defining the terms and categories of various types of CSLs available to the public.					

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O = Recommendation is open with agreed-to corrective actions pending.
 C = Recommendation is closed with all agreed-to actions completed.
 U = Recommendation is unresolved with resolution efforts in progress.

## Appendix Glossary of Terms

Abbreviation/	
Acronym	Definition
ACRES	Assessment Cleanup and Redevelopment Exchange System
AFS	Air Facility System
AIRS	Aerometric Information Retrieval System
AMTIC	Ambient Monitoring Technical Information Center
AQS	Air Quality System
ASBO	Asbestos and Small Business Ombudsman
BAC	Business Assistance Center
BACT	Best Available Control Technology
CATC	Clean Air Technology Center
CEAM	Center for Exposure Assessment Modeling
CHIEF	Clearinghouse for Inventories and Emissions Factors
EFIN	Environmental Finance Information Network
EISC	Environmental Information Service Center
EJ	Environmental Justice
EMC	Emissions Measurement Center
eNOI	Electronic Notice of Intent
EPCRA	Emergency Planning and Community Right-to-Know Act
FTEs	Full-Time Equivalents
GWERIC	Ground Water and Ecosystem Restoration Information Center
HQ	Headquarters
ICIS	Integrated Compliance Information System
IRIS	Integrated Risk Information System
LAER	Lowest Achievable Emission Rate
MICE	Methods Information Communication Exchange
MRWMD	Materials Recovery & Waste Management Division
NCEE	National Center for Environmental Economics
NCEA	National Center for Environmental Assessment
NERL	National Exposure Research Laboratory
NLIC	National Lead Information Center
NSCEP	National Service Center for Environmental Publications
OA	Office of the Administrator
OAQPS	Office of Air Quality Planning & Standards
OAR	Office of Air and Radiation
OCFO	Office of the Chief Financial Officer
OCSPP	Office of Chemical Safety and Pollution Prevention
OECA	Office of Compliance and Enforcement
OPP	Office of Pesticide Programs
OPPT	Office of Pollution Prevention and Toxics
ORCR	Office of Resource Conservation and Recovery
ORD	Office of Research and Development
ORPL	Office of the Regional Public Liaison
OSBP	Office of Small Business Programs
OSRTI	Office of Superfund Remediation and Technology Innovation
OSWER	Office of Solid Waste and Emergency Response
OTAQ	Office of Transportation and Air Quality
PPIC	Pollution Prevention Information Clearinghouse

Abbreviation/	
Acronym	Definition
PAYT	Pay-As-You-Throw
RACT	Reasonably Available Control Technology
RBLC	Reasonably Available Control Technology/ Best Available Control Technology/
	Lowest Achievable Emission Rate Clearinghouse
RMP	Risk Management Program
SCRAM	Support Center for Regulatory Atmospheric Modeling
SEEs	Senior Environmental Employees
SEMS	Superfund Enterprise Management System
STORET	STOrage and RETrieval
TSCA	Toxic Substances Control Act
TRI	Toxics Release Inventory

## Monitoring Y/N – 41 External CSLs

Region/Program office	Customer service line	Y/N
Region 3	Customer Service Hotline	Y
Region 2	Office of the Regional Public Liaison (ORPL) Hotline	Y
OSWER	Superfund Enterprise Management System (SEMS) Reference Desk	Y
OCFO	Environmental Finance Information Network (EFIN)	Y
Region 3	Business Assistance Center (BAC)	Y
Region 1	Customer Call Center	Y
Region 3	Regional Public Information Center	Y
OECA	Integrated Compliance Information System (ICIS) Help Desk	Y
Region 2	Citizen Complaint Hotline	Y
OSWER/OSRTI	Superfund, TRI, EPCRA, RMP & Oil Information Center	Y
OAR/OAQPS	AR/OAQPS Support Center for Regulatory Atmospheric Modeling (SCRAM)	
Region 8	Environmental Information Service Center (EISC)	Y
Office of Water	eNOI Help Desk	Y
Region 7	Call Center	Y
Region 6 Prevention and Response Branch	Spill response or hotline	Y
Region 7	24-Hour Spill Line	Y
OSWER-Office of Brownfield's and Land Revitalization	Assessment Cleanup and Redevelopment Exchange System (ACRES) Help Desk	Y
OAR/OAQPS	Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse	Y
OAR/OTAQ	SmartWay Help Line	Y
OAR/OAQPS	Emissions Measurement Center (EMC) Hotline	Y

Continued on next page

## Monitoring Y/N – 41 External CSLs

Region/Program office	Customer service line	Y/N
OCSPP/OPPT	National Lead Information Center (NLIC)	Υ
OAR	Energy Star Hotline	Y
Office of Water	Safe Drinking Water Hotline	Υ
OCSPP/OPPT	Toxic Substances Control Act (TSCA) Hotline	Υ
ORD/NCEA	Integrated Risk Information System (IRIS) Hotline	Υ
OA/OSBP	Asbestos and Small Business Ombudsman (ASBO) Hotline	Y
Office of Water	STOrage and RETrieval (STORET) Help Desk	Υ
ORD/NERL	Center for Exposure Assessment Modeling (CEAM)	Y
OAR	Imported Vehicles and Engines Public Help Line	Υ
OCSPP/OPPT	Pollution Prevention Information Clearinghouse (PPIC)	Y
OECA	Environmental Justice Hotline (EJ Hotline)	Υ
OAR/OAQPS	Clearinghouse for Inventories and Emissions Factors (CHIEF) 1/	Y
HQ-OSWER/ORCR/MRWMD	Methods Hotline (MICE)	Υ
HQ-OCSPP/OPP	Endangered Species Protection Bulletin	Y
Region 3	Superfund Hotline	N
OA/(NCEE)	National Center for Environmental Economics, Economics Library	N
Region 2	Public Affairs Hotline	N
OAR	Acid Rain Hotline	N
OAR/OAQPS	Clean Air Technology Center (CATC)	N
OAR	Stratospheric Ozone Protection Information Hotline	N
OAR/OAQPS	Ambient Monitoring Technical Information Center (AMTIC)	N
	CSLs being monitored - 34	82.93%
	CSLs not being monitored - 7	17.07%
	Total	100.00%

<sup>1/</sup> On September 6, 2013, the Agency notified us that this CSL no longer existed.

Source: OIG analysis of the EPA's response to OIG questionnaire.

## Monitoring Y/N – 21 External CSLs Operated by Contractors

Region/Program office	Customer service line	Monitoring Y/N
ORD/NCEA	Integrated Risk Information System (IRIS) Hotline	Y
OCSPP/OPPT	Pollution Prevention Information Clearinghouse (PPIC)	Υ
Office of Water	STOrage and RETrieval (STORET) Help Desk	Υ
OCFO	Environmental Finance Information Network (EFIN)	Y
OSWER-Office of Brownfield's and Land Revitalization	Assessment Cleanup and Redevelopment Exchange System (ACRES) Help Desk	Y
OAR	Energy Star Hotline	Υ
OCSPP/OPPT	Toxic Substances Control Act (TSCA) Hotline	Y
OAR	Imported Vehicles and Engines Public Help Line	Y
OAR/OAQPS	Clearinghouse for Inventories and Emissions Factors (CHIEF) 1/	Y
Office of Water	Safe Drinking Water Hotline	Υ
OCSPP/OPPT	National Lead Information Center (NLIC)	Y
ORD/NERL	Center for Exposure Assessment Modeling (CEAM)	Y
Region 3	Customer Service Hotline	Υ
Region 7	Call Center	Y
Office of Water	eNOI Help Desk	Υ
OSWER	Superfund Enterprise Management System (SEMS) Reference Desk	Y
OAR/OAQPS	Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse	Y
OAR/OAQPS	Support Center for Regulatory Atmospheric Modeling (SCRAM)	Y
OSWER/OSRTI	Superfund, TRI, EPCRA, RMP & Oil Information Center	Y
HQ-OSWER/ORCR/MRWMD	Methods Hotline (MICE)	Υ
Region 8	Environmental Information Service Center (EISC)	Y
	CSLs monitored - 21	100.00%
	CSLs not monitored - 0	0.00%
	Total	100.00%

<sup>1/</sup> On September 6, 2013, the Agency notified us that this CSL no longer existed.

Source: OIG analysis of the EPA's response to OIG questionnaire.

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### Monitoring Y/N – 20 External CSLs Non-Contractor Operated

Region/Program office	Customer service line	Monitoring Y/N
OECA	Environmental Justice Hotline (EJ Hotline)	Y
Region 6 Prevention and Response Branch	Spill Response or Hotline	Y
OA/OSBP	Asbestos and Small Business Ombudsman (ASBO) Hotline	Y
Region 7	24-Hour Spill Line	Y
Region 1	Customer Call Center	Y
Region 2	Citizen Complaint Hotline	Y
OECA	Integrated Compliance Information System (ICIS) Help Desk	Y
OAR/OAQPS	Emissions Measurement Center (EMC) Hotline	Y
Region 3	Regional Public Information Center	Y
Region 2	Office of the Regional Public Liaison (ORPL) Hotline	Y
Region 3	Business Assistance Center (BAC)	Y
OAR/OTAQ	SmartWay Help Line	Y
HQ-OCSPP/OPP	Endangered Species Protection Bulletin (Pesticides) Request Line	Y
HQ-(NCEE)	National Center for Environmental Economics, Economics Library	N
Region 3	Superfund Hotline	N
Region 2	Public Affairs Hotline	N
OAR/OAQPS	Ambient Monitoring Technical Information Center (AMTIC)	N
OAR/OAQPS	Clean Air Technology Center (CATC)	N
OAR	Stratospheric Ozone Protection Information Hotline	N
OAR	Acid Rain Hotline	N
	CSLs monitored - 13	65.00%
	CSLs not monitored - 7	35.00%
	Total	100.00%

Source: OIG analysis of the EPA's response to OIG questionnaire.

## Evaluating Success Y/N – 41 External CSLs

Region/Program office	Customer service line	Evaluating success Y/N
Region 2	Citizen Complaint Hotline	Y
Region 2	Office of the Regional Public Liaison (ORPL) Hotline	Y
OSWER/OSRTI	Superfund, TRI, EPCRA, RMP & Oil Information Center	Y
OSWER	Superfund Enterprise Management System (SEMS) Reference Desk	Y
Region 6 Prevention and Response Branch	Spill Response or Hotline	Y
Region 8	Environmental Information Service Center (EISC)	Y
OCSPP/OPPT	Toxic Substances Control Act (TSCA) Hotline	Y
ORD/NCEA	Integrated Risk Information System (IRIS) Hotline	Y
Office of Water	STOrage and RETrieval (STORET) Help Desk	Y
OECA	Environmental Justice Hotline (EJ Hotline)	Y
Region 1	Customer Call Center	N
Region 3	Superfund Hotline	N
Region 3	Business Assistance Center (BAC)	N
Region 3	Customer Service Hotline	N
Region 3	Regional Public Information Center	N
HQ-(NCEE)	National Center for Environmental Economics, Economics Library	N
OSWER-Office of Brownfield's and Land Revitalization	Assessment Cleanup and Redevelopment Exchange System (ACRES) Help Desk	N
Region 2	Public Affairs Hotline	N
Office of Water	eNOI Help Desk	N
OECA	Integrated Compliance Information System (ICIS) Help Desk	N
Region 7	Call Center	N

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## Evaluating Success Y/N – 41 External CSLs

Region/Program office	Customer service line	Evaluating success Y/N
Region 7	24-Hour Spill Line	N
OAR/OAQPS	Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse	N
OAR/OAQPS	Support Center for Regulatory Atmospheric Modeling (SCRAM)	N
HQ-OSWER/ORCR/MRWMD	Methods Hotline (MICE)	N
HQ-OCSPP/OPP	Endangered Species Protection Bulletin (Pesticides) Request Line	N
ORD/NERL	Center for Exposure Assessment Modeling (CEAM)	N
Office of Water	Safe Drinking Water Hotline	N
OCSPP/OPPT	National Lead Information Center (NLIC)	N
OCSPP/OPPT	Pollution Prevention Information Clearinghouse (PPIC)	N
OAR	Acid Rain Hotline	N
OAR	Stratospheric Ozone Protection Information Hotline	N
OAR	Energy Star Hotline	N
OA/OSBP	Asbestos and Small Business Ombudsman (ASBO) Hotline	N
OAR/OTAQ	SmartWay Help Line	N
OAR/OAQPS	Ambient Monitoring Technical Information Center (AMTIC)	N
OAR/OAQPS	Emissions Measurement Center (EMC) Hotline	N
OAR/OAQPS	Clean Air Technology Center (CATC)	N
OAR/OAQPS	Clearinghouse for Inventories and Emissions Factors (CHIEF) 1/	N
OAR	Imported Vehicles and Engines Public Help Line	N
OCFO	Environmental Finance Information Network (EFIN)	N
	CSLs evaluating success - 10	24.39%
	CSLs not evaluating success - 31	75.61%
	Total	100.00%

<sup>1/</sup> On September 6, 2013, the Agency notified us that this CSL no longer existed.

Source: OIG analysis of the EPA's response to OIG questionnaire.

# Ensuring Accuracy of Information Y/N – 41 External CSLs

Region/Program office	Customer service line	Ensuring information accuracy Y/N
Region 3	Regional Public Information Center	Y
Office of Water	eNOI Help Desk	Y
Region 7	24-Hour Spill Line	Y
Region 8	Environmental Information Service Center (EISC)	Y
OECA	Integrated Compliance Information System (ICIS) Help Desk	Y
Region 2	Office of the Regional Public Liaison (ORPL) Hotline	Y
Region 7	Call Center	Y
Region 3	Business Assistance Center (BAC)	Y
Region 2	Citizen Complaint Hotline	Y
Region 6 Prevention and Response Branch	Spill Response or Hotline	Y
Region 3	Customer Service Hotline	Y
OAR/OAQPS	Support Center for Regulatory Atmospheric Modeling (SCRAM)	Y
Region 3	Superfund Hotline: 1-800-553-2509	Y
OSWER	Superfund Enterprise Management System (SEMS) Reference Desk	Y
OSWER-Office of Brownfield's and Land Revitalization	Assessment Cleanup and Redevelopment Exchange System (ACRES) Help Desk	Y
OAR	Stratospheric Ozone Protection Information Hotline	Y
HQ-OSWER/ORCR/MRWMD	Methods Hotline (MICE)	Y
OECA	Environmental Justice Hotline (EJ Hotline)	Y
OCFO	Environmental Finance Information Network (EFIN)	Y
ORD/NERL	Center for Exposure Assessment Modeling (CEAM)	Y

Continued on next page

## Ensuring Accuracy of Information Y/N – 41 External CSLs

Region/Program office	Customer service line	Ensuring information accuracy Y/N
Office of Water	STOrage and RETrieval (STORET) Help Desk	Υ
OSWER/OSRTI	Superfund, TRI, EPCRA, RMP & Oil Information Center	Y
OAR/OAQPS	Clearinghouse for Inventories and Emissions Factors (CHIEF) 1/	Y
OCSPP/OPPT	National Lead Information Center (NLIC)	Υ
OCSPP/OPPT	Pollution Prevention Information Clearinghouse (PPIC)	Y
OCSPP/OPPT	Toxic Substances Control Act (TSCA) Hotline	Υ
OAR	Imported Vehicles and Engines Public Help Line	Υ
OAR/OTAQ	SmartWay Help Line	Υ
OA/OSBP	Asbestos and Small Business Ombudsman (ASBO) Hotline	Y
Office of Water	Safe Drinking Water Hotline	Υ
ORD/NCEA	Integrated Risk Information System (IRIS) Hotline	Y
OAR	Energy Star Hotline	Υ
OAR/OAQPS	Emissions Measurement Center (EMC) Hotline	Υ
OAR/OAQPS	Ambient Monitoring Technical Information Center (AMTIC)	N
HQ-OCSPP/OPP	Endangered Species Protection Bulletin (Pesticides) Request Line	N
OAR	Acid Rain Hotline	N
OAR/OAQPS	Clean Air Technology Center (CATC)	N
Region 1	Customer Call Center	N
OAR/OAQPS	Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse	N
Region 2	Public Affairs Hotline	N
OA/(NCEE)	National Center for Environmental Economics, Economics Library	N
	CSLs ensuring customer satisfaction - 33	80.49%
	CSLs not ensuring customer satisfaction - 8	19.51%
	Total	100.00%

 $<sup>1/\,\</sup>mbox{On September}$  6, 2013, the Agency notified us that this CSL no longer existed.

Source: OIG analysis of the EPA's response to OIG questionnaire.

### Appendix E-1

## Cost Per Inquiry – 41 External CSLs

Region/Program	Customer service line	Volume per year	Costs <sup>1/</sup>	Cost per inquiry	
office			FY 2011		
Region 2	Office of the Regional Public Liaison (ORPL) Hotline	676	Not provided	Unable to calculate	
Region 1	Customer Call Center	3,900	1 FTE	Unable to calculate	
Region 3	Regional Public Information Center	2,800	1 SEE	Unable to calculate	
OECA	Integrated Compliance Information System (ICIS) Help Desk	1,653	1 FTE	Unable to calculate	
Region 2	Citizen Complaint Hotline	615	.25 FTE	Unable to calculate	
OSWER/OSRTI	Superfund, TRI, EPCRA, RMP & Oil Information Center	Not provided	943,650	Unable to calculate	
OAR/OAQPS	Support Center for Regulatory Atmospheric Modeling (SCRAM)	Various activities	10,000	Unable to calculate	
OAR/OTAQ	SmartWay Help Line	Not provided	Not provided	Unable to calculate	
OAR	Acid Rain Hotline	240	Not provided	Unable to calculate	
OAR/OAQPS	Clean Air Technology Center (CATC)	17,500	EPA staff	Unable to calculate	
OAR	Stratospheric Ozone Protection Information Hotline	840	1 SEE	Unable to calculate	
OAR/OAQPS	Emissions Measurement Center (EMC) Hotline	240	.25 FTE	Unable to calculate	
OAR/OAQPS	Ambient Monitoring Technical Information Center (AMTIC)	150	.25 FTE	Unable to calculate	
ORD/NCEA	Integrated Risk Information System (IRIS) Hotline	495	203,750	\$ 411.62	
HQ-(NCEE)	National Center for Environmental Economics,	129	32,000	248.06	
OCSPP/OPPT	Pollution Prevention Information Clearinghouse (PPIC)	312	73,016	234.03	
Office of Water	STOrage and RETrieval (STORET) Help Desk	1,000	136,225	136.23	
HQ-OSWER/ORCR/MR WMD	Methods Hotline (MICE)	1,476	126,500	85.70	
OCFO	Environmental Finance Information Network (EFIN)	91	6,553	72.01	
OSWER-Office of Brownfield's & Land Revitalization	Assessment Cleanup and Redevelopment Exchange System (ACRES) Help Desk	624	40,000	64.10	

<sup>1/</sup> Costs to operate CSLs reported by the agency. The elements of costs included may vary by region or program office

Continued on next page

## Cost Per Inquiry – 41 External CSLs

Region/	Customer service line	Volume service line		Cost per inquiry
Program office	Customer Service inte		FY 2011	mqun y
OECA	Environmental Justice Hotline (EJ Hotline)	960	\$ 39,500	\$41.15
OAR	Energy Star Hotline	24,277	884,913	36.45
OCSPP/OPPT	Toxic Substances Control Act (TSCA) Hotline	7,484	263,897	35.26
Region 6 Prevention and Response Branch	Spill Response or Hotline	5,066	138,424	27.32
OA/OSBP	Asbestos and Small Business Ombudsman (ASBO) Hotline	7,200	165,434	22.98
OAR	Imported Vehicles and Engines Public Help Line	4,004	91,629	22.88
OAR/OAQPS	Clearinghouse for Inventories and Emissions Factors (CHIEF) 2/	760	17,000	22.37
Region 7	24-Hour Spill Line	3,000	62,942	20.98
OCSPP/OPPT	National Lead Information Center (NLIC)	74,062	1,457,875	19.68
Office of Water	Safe Drinking Water Hotline	18,321	360,444	19.67
ORD/NERL	Center for Exposure Assessment Modeling (CEAM)	9,938	116,000	11.67
Region 3	Customer Service Hotline	7,560	85,000	11.24
Region 7	Call Center	16,706	139,812	8.37
Office of Water	Electronic Notice of Intent (eNOI) Help Desk	21,840	142,007	6.50
OSWER	Superfund Enterprise Management System (SEMS) Reference Desk	2,600	14,016	5.39
HQ-OCSPP/OPP	Endangered Species Protection Bulletin (Pesticides) Request Line	50	240	4.80
Region 8	Environmental Information Service Center (EISC)	39,251	170,264	4.34
Region 3	Superfund Hotline	150	243	1.62
Region 3	Business Assistance Center (BAC)	350	258	0.74
OAR/OAQPS	Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse	89,100	20,000	0.22
Region 2	Public Affairs Hotline	2,166	437	0.20
	Total	367,586	\$ 5,742,029	

<sup>1/</sup> Costs to operate CSLs reported by the agency. The elements of costs included may vary by region or program office

Source: OIG analysis of the EPA's response to OIG questionnaire.

 $<sup>2\!/</sup>$  On September 6, 2013, the Agency notified us that this CSL no longer existed.

**Appendix E-2** 

Cost Per Inquiry – 21 CSLs Operated by Contractors

Region /Program office	Customer service line	Volume per year	Costs 1/	Cost per inquiry
		FY 2011		
ORD/NCEA	Integrated Risk Information System (IRIS) Hotline	495	\$ 203,750	\$ 411.62 <sup>2/</sup>
OCSPP/OPPT	Pollution Prevention Information Clearinghouse (PPIC)	312	73,016	234.03
Office of Water	STOrage and RETrieval (STORET) Help Desk	1,000	136,225	136.23
HQ- OSWER/ORCR/MRWMD	Methods Information Communication Exchange (MICE)	1,476	126,500	85.70
OCFO	Environmental Finance Information Network (EFIN)	91	6,553	72.01
OSWER-Office of Brownfields and Land Revitalization	Assessment Cleanup and Redevelopment Exchange System (ACRES) Help Desk	624	40,000	64.10
OAR	Energy Star Hotline	24,277	884,913	36.45
OCSPP/OPPT	Toxic Substances Control Act (TSCA) Hotline	7,484	263,897	35.26
OAR	Imported Vehicles and Engines Public Help Line	4,004	91,629	22.88
OAR/OAQPS	Clearinghouse for Inventories and Emissions Factors (CHIEF) 3/	760	17,000	22.37
OCSPP/OPPT	National Lead Information Center (NLIC)	74,062	1,457,875	19.68
Office of Water	Safe Drinking Water Hotline	18,321	360,444	19.67
ORD/NERL	Center for Exposure Assessment Modeling (CEAM)	9,938	116,000	11.67
Region 3	Customer Service Hotline	7,560	85,000	11.24
Region 7	Call Center	16,706	139,812	8.37
Office of Water	Electronic Notice of Intent (eNOI) Help Desk	21,840	142,007	6.50
OSWER	Superfund Enterprise Management System (SEMS) Reference Desk	2,600	14,016	5.39
Region 8	Environmental Information Service Center (EISC)	39,251	170,264	4.34
OAR/OAQPS	Reasonably Available Control Technology (RACT)/Best Available Control technology (BACT)/Lowest Achievable Emission Rate (LAER) Clearinghouse	89,100	20,000	0.22
OAR/OAQPS	Support Center for Regulatory Atmospheric Modeling (SCRAM)	Not specific enough	10,000	N/A
OSWER/OSRTI	Superfund, TRI, EPCRA, RMP & Oil Information Center	Not provided	943,650	N/A
	Subtotal – 21 external CSLs operated by contractors	319,901	\$5,302,551	

<sup>1/</sup> Costs to operate CSLs reported by the agency. The elements of costs included may vary by region or program office.

Source: OIG analysis of the EPA's response to OIG questionnaire.

<sup>2/</sup> On September 6, 2013, the Agency stated that the cost per inquiry of \$411.62 is misleading as the CSL cost of \$203,750 represents several contractor functions. The Agency does not have data that allow it to provide an amount that is attributable specifically to answering inquiries.

<sup>3/</sup> On September 6, 2013, the Agency notified us that this CSL no longer existed.

## Cost Per Inquiry – 20 CSLs Non-Contractor Operated

Danian/Duannan	O	Volume per	Cost <sup>1/</sup>	Cost per inquiry (cost/volume)
Region/Program office	Customer service line	year (cost/volu		
OA/NCEE	National Center for Environmental Economics, Economics Library	129	\$ 32,000	\$ 248.06
OECA	Environmental Justice Hotline	960	39,500	41.15
R6 Prevention and Response Branch	Spill Response or Hotline	5,066	138,424	27.32
OA/OSBP	Asbestos and Small Business Ombudsman (ASBO) Hotline	7,200	165,434	22.98
Region 7	24 Hour Spill Line	3,000	62,942	20.98
HQ-OCSPP/OPP	Endangered Species Protection Bulletin (Pesticides) Request Line	50	240	4.80
Region 3	Superfund Hotline	150	243	1.62
Region 3	Business Assistance Center (BAC)	350	258	0.74
Region 2	Public Affairs Hotline	2,166	437	0.20
Region 1	Customer Call Center	3,900	1 FTE	N/A
Region 2	Citizen Complaint Hotline	615	.25 FTE	N/A
OECA	ICIS Help Desk	1,653	1 FTE	N/A
OAR/OAQPS	Ambient Monitoring Technical Information Center (AMTIC)	150	.25 FTE	N/A
OAR/OAQPS	The Emissions Measurement Center (EMC) Hotline	240	.25 FTE	N/A
OAR/OAQPS	Clean Air Technology Center (CATC)	17,500	EPA staff	N/A
OAR	Stratospheric Ozone Protection Information Hotline	840	1 SEE	N/A
Region 3	Regional Public Information Center	2,800	1 SEE	N/A
Region 2	Office of the Regional Public Liaison (ORPL) Hotline	676	Not provided	N/A
OAR	Acid Rain Hotline	240	Not provided	N/A
OAR/OTAQ	SmartWay Help Line	Not provided	Not provided	N/A
	Subtotal - 20 CSLs non-contractor operated	47,685	439,478	
	Total for 41 externals	367,586	\$ 5,742,029	

<sup>1/</sup> Costs to operate CSLs reported by the agency. The elements of costs included may vary by region or program office.

Source: OIG analysis of the EPA's response to OIG questionnaire.

## Summary Costs of 21 CSLs Operated by Contractors

Description	No. of CSLs	Volume per year FY 2011	Percentage of volume	FY 2011 Cost <sup>1/</sup>	Percentage of cost
CSLs provided volume and costs	19	319,901	87.03%	\$ 4,348,901	75.74%
CSLs no volume provided	2	Not provided	N/A	953,650	16.61%
Subtotal CSLs operated by contractors	21	319,901	87.03%	5,302,551	92.35%

Source: OIG analysis of the EPA's response to OIG questionnaire.

**Appendix E-5** 

### Summary Costs of 20 CSLs Non-Contractor Operated

Description	No. of CSLs	Volume per year FY 2011	Percentage of volume	FY 2011 Cost	Percentage of cost
CSLs provided with volume and costs	9	19,071	5.19%	\$ 439,478	7.65%
CSLs provided costs with SEEs and FTEs	8	27,698	7.62%	Not provided	N/A
CSLs no cost provided	2	916	0.25%	Not provided	N/A
CSL neither volume nor costs provided	1	Not provided	N/A	Not provided	N/A
Subtotal CSLs non-contractor operated	20	47,685	12.97%	439,478	7.65%
Total	41	367,586	100.00%	\$ 5,742,029	100.00%

<sup>1/</sup> Costs to operate CSLs reported by the agency. The included elements in costs may vary by region or program office.

Source: OIG analysis of the EPA's response to OIG questionnaire.

# External CSLs Listed on EPA's National Website

	Hotline/clearinghouse (per the EPA's national website)	Agency   information	provided to the OIG
1	Acid Rain Hotline	Yes	
2	Aerometric Information Retrieval System (AIRS) - Air Quality System (AQS)	-	No
3	Aerometric Information Retrieval System (AIRS) - Air Facility System (AFS) Help Line	Yes	-
4	Ambient Monitoring Technology Information Center	Yes	-
5	Asbestos Ombudsman Hotline (part of the Small Business Ombudsman)	Yes	-
6	Center for Exposure Assessment Modeling (CEAM) Help Desk	Yes	-
7	Clean Air Technology Center (CATC) Information Line; formerly Control Technology Center	Yes	-
8	Clearinghouse for Inventories and Emission Factors (CHIEF) Help Desk <sup>1/</sup>	Yes	-
9	Compliance Assistance Centers	Yes	-
10	Emissions Measurement Center (EMC)	Yes	-
11	Endangered Species Protection Bulletin (Pesticides) Request Line	Yes	-
12	Energy Star	Yes	-
13	Environmental Education Clearinghouse	-	No
14	Environmental Finance Information Network (EFIN)	Yes	-
15	Environmental Justice Hotline	Yes	-
16	EPA Enforcement Economic Models Help Line		No
17	EPA Imported Vehicles and Engines Public Help Line	Yes	
18	EPA Test Methods	-	No
19	Ground Water and Ecosystem Restoration Information Center (GWERIC)	-	No
20	Integrated Risk Information System (IRIS) Hotline	Yes	-
21	Local Government Reimbursement Program Help Line	-	No
22	Methods Information Communication Exchange Service (MICE)	Yes	
23	Mexico Border Hotline	-	No

 $<sup>1/\,\</sup>mbox{On September}$  6, 2013, the Agency notified us that this CSL no longer existed.

Continued on next page

# External CSLs Listed on EPA's National Website

	Hotline/clearinghouse (per the EPA's national website)	Agency provided information to the OIG	
24	National Service Center for Environmental Publications (NSCEP) (formerly NCEPI)	-	No
25	National Lead Information Center Hotline	Yes	-
26	National Pesticide Information Center	-	No
27	National Poison Control Hotline	=	No
28	National Radon Hotlines	-	No
29	National Small Flows Clearinghouse Hotline	-	No
30	Ozone Protection Hotline	Yes	
31	Pay-As-You-Throw (PAYT) Help Line		No
32	Pollution Prevention Information Clearinghouse (PPIC)	Yes	
33	Reasonably Available Control Technology/ Best Available Control Technology/ Lowest Achievable Emission Rate Clearinghouse (RBLC)	Yes	
34	Safe Drinking Water Hotline	Yes	
35	Small Business Ombudsman Hotline	-	No
36	SmartWay Program Hotline	Yes	
37	Storet Water Quality System Hotline	Yes	
38	Superfund Document Center	-	No
39	Superfund and EPCRA Call Center	Yes	
40	Toxics Release Inventory - Information Center Hotline	-	No
41	Toxics Release Inventory – General Program Inquiries	-	No
42	Toxic Substances Control Act (TSCA) Hotline	Yes	-
43	Water Efficiency Clearinghouse: WaterWiser	-	No
44	WasteWise Help Line	Yes	-
	Agency provided information	26	
	Agency did not provide information		18

Source: OIG analysis of the EPA's response to the OIG questionnaire, and information from the "Hotlines and Clearinghouses" Web page.

# Cost of 18 External CSLs Not Listed on EPA's National Website

Region/ Program office	Customer service line	FY 2011 cost
	Office of the Regional Public	
Region 2	Liaison Hotline	Not provided
Region 1	Customer Call Center	1 FTE
Region 3	Regional Public Information Center	1 SEE
Office of Enforcement and Compliance	Integrated Compliance Information	1 FTE
Assurance (OECA)	System (ICIS) Help Desk	
Region 2	Citizen Complaint Hotline	.25 FTE
Region 8	Environmental Information Service Center (EISC)	170,264
Office of Water	Electronic Notice of Intent (eNOI) Help Desk	142,007
Region 7	Call Center	139,812
	Spill response or hotline	
Region 6 Prevention and Response Branch		138,424
Region 3	Customer Service Hotline	85,000
Region 7	24-Hour Spill Line	62,942
OSWER-Office of Brownfields and Land Revitalization	Assessment Cleanup and Redevelopment Exchange System (ACRES) Help Desk	40,000
OA/NCEE	National Center for Environmental Economics, Economics Library	32,000
OSWER	Superfund Enterprise Management System Reference Desk	14,016
OAR/OAQPS	Support Center for Regulatory Atmospheric Modeling (SCRAM)	10,000
Region 2	Public Affairs Hotline	437
Region 3	Business Assistance Center (BAC)	258
Region 3	Superfund Hotline	243
	Total cost	\$ 835,403

Source: Information provided by the regions and headquarters program offices.

# Two External CSLs Not Readily Available on EPA Regional Websites

Region/Program office	Customer service line	Costs for FY 2011
	Office of the Regional Public	
Region 2	Liaison Hotline	Not provided
Region 6 Prevention and Response Branch	Spill Response or Hotline	138,424
	Total cost	\$ 138,424

Source: Information provided by the regions and headquarters program offices.

### Agency Comments on Draft Report



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

AUG 2 3 2013

DEPUTY ADMINISTRATOR

#### **MEMORANDUM**

SUBJECT: Response to Office of Inspector General's Draft Report on Administration

of U.S. Environmental Protection Agency's Customer-Service Lines

FROM:

Bob Perciasepe

TO:

Arthur Elkins, Inspector General

I appreciate the opportunity to review and comment on the Office of Inspector General's July 10, 2013, draft audit report, *Controls and Oversight Needed to Improve Administration of the EPA's Customer Service Lines*. Thank you for highlighting possible management improvements in the agency's customer-service lines.

The EPA agrees with the draft report's message that it is necessary to consider an appropriate policy response for improved administration of customer-service lines. More specifically, the draft report designates for my office the three recommendations for action. However, administrative policy for customer-service lines is not a current, ongoing function of the Office of the Administrator. The draft recognizes this by recommending such policy now.

Consideration of any policy must be supported by information, analysis and experiences of the numerous EPA offices with direct responsibility for customer-service lines. Accordingly, I have sent the attached memorandum to all assistant, associate and regional administrators to ask them for the necessary information to prepare an appropriate and informed response to the significant issues raised. After I receive this information, I will develop and implement necessary improvements in the EPA's administration of customer-service lines and their Web presence.

Should you have any questions or require additional information, your staff may contact Patricia A. Gilchriest, audit liaison in the Office of the Administrator, at (202) 564-0404 or gilchriest.patricia@epa.gov.

Attachment

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

#### AUG 2 1 2013

DEPUTY ADMINISTRATOR

### MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report on Administration

of the U.S. Environmental Protection Agency's Customer-Service Lines

FROM: Bob Perciasepe ( SM, Paraidse Al

TO: Assistant Administrators

Associate Administrators Regional Administrators

I have attached a draft Office of Inspector General report on administration of the U.S. Environmental Protection Agency's customer-service lines that recommends the Deputy Administrator develop guidances for these lines and review their efficiency. To assist in developing an appropriate written response and ensure we are working to improve our management of such programs, I ask you to provide the following information by Wednesday, September 18, and to copy Amir Ingram in my office:

- your review of the completeness of information for your office in the draft report, particularly
  office-specific or customer-service-lines-specific information in the tables and appendices;
- a summary of any past or recent actions you have taken and any future plans or proposals you
  might have for active consolidation of customer-service lines and their Web presence to address
  overlap or underuse; and
- any suggested response to the OIG draft report's recommendations, including your ideas for improving administration of customer-service lines in your office and agencywide.

Please be aware that this draft report does not represent the OIG's final position. Accordingly, you may distribute or disclose its contents only to those in your offices who need to contribute to your response to this request.

Thank you for your timely assistance in this matter.

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