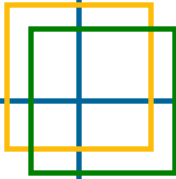




July 2009



# Evaluation of the Regional Geographic Initiatives

## Final Report



**Promoting Environmental Results**



**Through Evaluation**



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## Acronyms and Abbreviations

AA	Assistant Administrator
ACS	Annual Commitment System
ARA	Assistant Regional Administrator
DRA	Deputy Regional Administrator
EJ	Environmental Justice
EPP	Environmental Priority Projects
FTE	Full-time Equivalents
IAC	Innovation Action Council
IAG	Inter-Agency Agreement
IGMS	Integrated Grants Management System
NPM	National Program Manager
MOU	Memorandum of Understanding
OA	Office of the Administrator
OCIR	Office of Congressional and Intergovernmental Relations
OPEI	Office of Policy, Economics and Innovation
ORO	Office of Regional Operations
RA	Regional Administrator
RFP	Request for Proposal
RGI	Regional Geographic Initiatives
RtC	RGI Report to Congress

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## Executive Summary

EPA established the Regional Geographic Initiatives (RGI) in 1994 to support EPA regional offices' place-based approaches to environmental problems that were unique to the Regions and were not addressed through existing national programs. RGI was designed to fund projects and programs that addressed these complex environmental challenges through integrated, multi-media approaches. RGI-funded projects have since involved a wide range of stakeholders from public and private sectors to address an array of local, state, and regional environmental challenges. RGI was grounded in a national mission statement and set of national criteria (Figure ES-1).

**Figure ES-1. RGI National Mission Statement and Criteria**

### **RGI Mission Statement**

*The Regional Geographic Initiatives (RGI) funds unique, geographically-based projects that fill critical gaps in the Agency's ability to protect human health and the environment.*

### **RGI Criteria**

RGI projects:

- Address places, sectors or innovative projects; and /or
- Are based on a regional, state or tribal or other strategic plan; and/or
- Address problems that are multi-media in nature or fill a critical gap in the protection of human health and the environment and/or
- Demonstrate state, local and/or other stakeholder participation; and/or
- Identify opportunities for leveraging other sources of funding; and/or
- Establish or identify baseline data; and/or
- Measure environmental outcomes (actual or potential).

RGI received national funding ranging from 10.8 million dollars in FY 1994 to 8.4 million dollars in FY 2007. The largest annual funding amounts were 12.7 million dollars in 1995 and 12.4 million dollars in 1996. Many RGI projects were components of larger Agency programs. The Regions used RGI to support Presidential, Administrator, and Agency initiatives such as children's health, watersheds, green buildings, sustainability, pollution prevention, environmental justice, and environmental stewardship. RGI was the only source of multi-media, flexible funding the Regions had to make real-time decisions and apply resources to local needs or emerging issues. Congress eliminated RGI funding in FY 2008; however, \$1.0 million was reprogrammed to fund RGI full-time equivalents (FTE) in that year. The FY 2009 Omnibus language passed by Congress in March 2009 states that RGI was not funded in FY 2009 due to, "continued concerns about the scope and purpose of the program."<sup>1</sup>

The purpose of this evaluation was to identify RGI's role, practices, and accomplishments, and to use the insights gained from the past to identify what improvements could strengthen any similar future

<sup>1</sup> [http://appropriations.house.gov/pdf/2009\\_Con\\_Statement\\_DivE.pdf](http://appropriations.house.gov/pdf/2009_Con_Statement_DivE.pdf) (page 38)

regional funding source. The evaluation was designed around six overarching evaluation questions (Figure ES- 2) which focused on understanding past RGI practices and identifying suggestions for improvements in future regional funding if such funding were to be reestablished. The results of this evaluation are intended for several audiences, primarily EPA senior leadership, RGI staff and management, OMB, and interested members of the U.S. Congress. Other audiences who may be interested in the results of this evaluation are EPA Regional Division Directors, Branch Chiefs, and EPA and non-EPA recipients of RGI funding.

A contractor team from Ross & Associates Environmental Consulting, Ltd. and Industrial Economics, Inc. conducted the evaluation with guidance from two evaluation leads; one from the EPA Office of Regional Operations, which oversees RGI at EPA Headquarters, and one from the Evaluation Support Division of EPA’s Office of Policy, Economics, and Innovation, which sponsors and supports the Agency’s program evaluations. The evaluation focused on information collected from existing reports and resources, interviews with key EPA regional and Headquarters staff, surveys completed by the regional RGI Coordinators, and analysis of data contained in EPA’s RGI database. The information used was both quantitative, such as project facts and funding amounts, and qualitative, such as individuals’ knowledge and perspectives.

The evaluation’s findings are presented in an order intended to “tell the story” of RGI in the context of this evaluation. The findings first focus on RGI’s role, accomplishments, and alignment with Agency priorities as these topics were of particular interest to evaluation participants. RGI practices, which were the subject of both confusion and scrutiny, are explored next in order to understand how RGI was implemented across the Regions. The findings conclude with a discussion of (hypothetical) options for future RGI-like regional funding.

## Findings Regarding RGI’s Role, Accomplishments, and Connectivity to Agency Priorities

### *The RGI Role*

Evaluation participants<sup>2</sup> described how the Regions sought RGI funding because, generally speaking, they had no other viable funding source to support unique regional priorities and needs. Regional participants clearly stated that RGI played an important role in filling a gap in the Agency’s funding for geographically based needs, other regional environmental priorities (e.g., children’s

### Figure ES-2. Overarching Evaluation Questions

1. How do RGI projects align with the RGI criteria and mission and reflect regional and national goals and priorities?
2. What is the process for selecting and funding RGI projects?
3. How are RGI outcomes and results identified and measured?
4. How are RGI outcomes and results communicated to different audiences and how could communication be improved?
5. What changes might be appropriate for a regional flexible funding source?
6. What alternative approaches should be considered for addressing flexible regional funding needs?

<sup>2</sup> “Participants” refers to interviewees and survey respondents who provided feedback and ideas on particular topics and questions.



health), and in some cases, general regional support. Regional participants and some Headquarters participants described a “constellation” of roles RGI played (see Figure ES-3). The “constellation” largely mirrors the RGI national criteria, encompassing place-based needs, multi-media approaches, stakeholder involvement, support for Agency strategic priorities, etc.

Some Headquarters participants were skeptical that RGI played an important role in the Agency’s work. Generally speaking, they thought that the work funded through RGI either was not sufficiently reflective of the Agency’s priorities, did not demonstrate identifiable results to support those priorities, and/or that RGI-funded work could be funded through national programs. This was the “minority” perspective amongst those interviewed for the evaluation.

### ***RGI Accomplishments***

Regional interviewees provided numerous examples of RGI accomplishments. By contrast, few Headquarters participants were able to identify more than a few RGI accomplishments and the accomplishments that they were aware of were anecdotal rather than based on reports or other “concrete” sources of information. The evaluators examined the copious information available on RGI results through the interviews and RGI database and were able to clearly identify several kinds of RGI accomplishments (both anticipated and completed) in addition to specific accomplishments resulting from individual RGI projects. Given the lack of consistent performance reporting and measurement in the RGI database, however, it was not possible to accurately *quantify* RGI accomplishments for all 453 projects analyzed for this evaluation.

### **Figure ES-3. Findings on the RGI Role**

#### **RGI:**

1. Addressed place-based needs;
2. Addressed multi-media challenges;
3. Supported national and regional priorities and commitments for which there was insufficient funding;
4. Addressed urgent and just-in-time needs;
5. Worked with targeted, underserved, and/or particularly vulnerable populations;
6. Funded research and development of innovative technologies and approaches;
7. Conducted regional outreach and education;
8. Fostered stakeholder collaboration and relationship building
9. Supported non-regulatory and beyond compliance programs; and
10. Leveraged other sources of funding.

The evaluation’s findings indicate that RGI-funded projects contributed to each of the Agency’s priority goal areas. Accomplishments included, but were not limited to: Improved stakeholder and community awareness of key environmental challenges and opportunities; improved regional ability to support national and regional goals, priorities, and commitments; improved environmental outcomes such as air and water quality; enhanced ability to test, implement, and educate about innovative technologies, tools, and approaches; and successful reproduction of RGI-funded projects in other areas. A summary of these and other types of RGI accomplishments are listed in Figure ES-4.

### ***Connectivity to Agency Priorities***

The evaluators found that, in general, RGI projects supported Agency priorities at both national and regional levels, though this finding is qualified by a lack of detailed information on how precisely RGI

projects supported specific priorities other than those at the highest level of the Agency's Strategic Plan (i.e., Goals 1-5).

**Figure ES-4. Summary of RGI Accomplishments\* (Anticipated and Completed\*\*)**

**RGI:**

1. Improved stakeholder and community awareness of key environmental challenges and opportunities;
2. Improved EPA and partner / stakeholder capacity to make progress on regional environmental priorities;
3. Improved regional ability to support national and regional goals, priorities, and commitments;
4. Improved regional information management and technological capacity;
5. Improved information and analysis on sensitive and emerging conditions / areas;
6. Improved air and water quality / reduced emissions, pollutant loading, land contamination, etc.;
7. Conducted testing, implementation, and education of innovative technologies, tools, and approaches;
8. Improved land management and watershed, habitat, and ecosystem health;
9. Improved public health and public awareness of environmental health risks;
10. Enabled model projects that were replicated elsewhere;
11. Improved general capacity at the regional level, including providing support for leadership training, internship programs, and travel costs;
12. Leveraged additional funds and provided external funding continuity for projects implemented with RGI "seed" money.

*Notes:*

*\* Accomplishments are ordered generally according to the frequency with which they were represented by the RGI projects*

*\*\* Based on interviews and analysis of anticipated and completed RGI project results in the RGI database*

Additional analysis of RGI's past accomplishments and linkage to the Agency's priorities are beyond the scope of this evaluation. If an RGI-like funding source were to be reinstated in the future, there would be opportunities to learn from advancements in the area of performance measurement and reporting, to streamline the identification of the accomplishments, and to tie the funding and accomplishments to Agency priorities. The inherent cross-program and multi-media nature of an RGI-like funding source would, however, mean that implementation of these improvements would require a commitment of resources and the Agency would likely want to consider the necessity, costs, and benefits of doing so.

## **RGI Practices**

The findings on RGI's implementation may help to address questions about RGI's past. These findings also provide insights into how a funding source like RGI could be improved in the future. Key findings on RGI practice areas are as follows:

### *Discretionary Use of RGI Funds*

Participants had divergent ideas about **perceived or actual “discretionary” use of RGI funds**. Many participants indicated that misunderstandings about the discretionary use of RGI funds, coupled with lack of knowledge and communication about RGI processes and results within the Agency, **undermined support for RGI**. The role of the “Environmental Priority Projects/ EPP” portion of RGI<sup>3</sup> – particularly that this portion could be used by the Regions to fund “general regional support needs” – fueled confusion and skepticism about RGI as a discretionary funding source. The discretion that could have been exercised was not exercised by all Regions, however, at least not for the past several years when most Regions minimized or eliminated the discretion they had in spending RGI funds.

Given the level of scrutiny RGI received with regard to spending on general regional support, evaluators assessed the use of RGI funds by Regions to see if any additional clarity on this issue could be achieved. Evaluators reviewed information on all 453 projects analyzed for this evaluation to estimate how many projects could be *reasonably* considered to fall in a “general regional support” category. The resulting list of “general support” projects is provided in Appendix 7 and is summarized in Table ES-1. Based on this analysis, approximately 13 percent of the projects and \$2.2 million (13.5 percent) of all RGI project dollars between FY 2005 and FY 2007 fit in this category. These estimates may be high, however, because at least a few of the projects included in this informal general regional support category could arguably support national RGI mission and criteria instead. Examples of such projects are development of a RCRA data management system and support for summer internship programs.

### *Funding Vehicles Used*

Evaluators used information in the RGI database to determine the distribution of RGI funding vehicles used in the FY 2005-FY 2007 time frame. Of the five funding vehicles used to distribute RGI funds (grants, contracts, cooperative agreements, inter-agency agreements (IAGs), and procurement requests), grants and contracts were the most common (see Figure ES-5). About 20 percent of the grant projects (or 9 percent of the total number of RGI projects) were funded with non-competitive grants. Non-competitive grants comprised approximately 12 percent of the total amount of RGI funding from FY 2005-FY 2007. The non-competitive grants included Agency-approved waivers from competition for projects to support the Great Cities Initiative in Region 5, support for the Senior Employee Employment Program in Region 10, standing Agency-wide exemptions for Clean Water Act Section 104(g) grants and other specific grant programs, and standing exemptions from competition for awards beneath the \$15,000 grant threshold. A full list of these projects is included in Appendix 6.

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<sup>3</sup> Each Region had the flexibility to use up to 35 percent of their RGI funds to support management priorities outside of the scope of the national RGI criteria. This 35 percent was commonly referred to as Environmental Priorities Projects or “EPP”. Some Regions did not differentiate between RGI and EPP funds or related decisions; other Regions had two separate processes for RGI and EPP funds. Further, the discretion that could have been exercised in project selection and use of funds was not exercised by all Regions, at least not for the past several years of RGI funding. According to the information collected for this evaluation, senior leaders in most Regions minimized or, in a few cases, eliminated discretionary decision making over the last 3-5 years of RGI funding. Section 3.3, “‘Discretionary’ Funding Issues”, explores this topic in more detail.

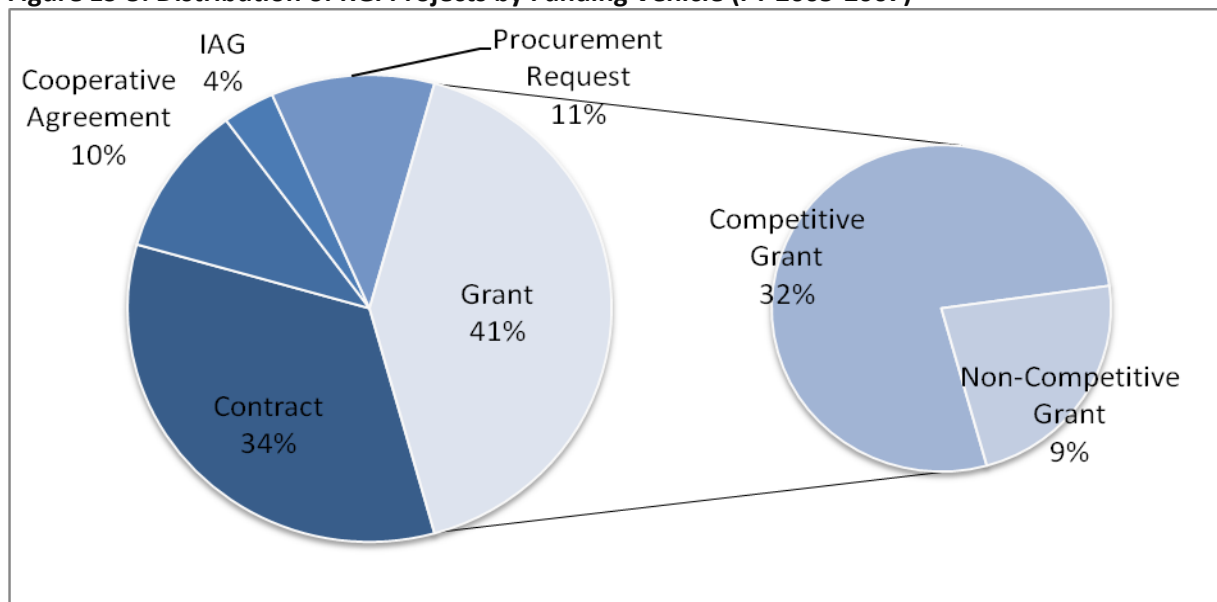
**Table ES-1. Summary of General Regional Support Projects (FY 2005-2007)**

Type of Support	Amount Funded	% of General Support Funding
Communication and outreach (e.g., regional priority reports, communicating priorities via the Web, public information access improvements)	\$554,104	25%
Records management	\$301,382	14%
Senior Environmental Employee Assistance* (one Region)	\$230,300	11%
Geographic Information Systems (technology, mapping, etc.)	\$224,372	10%
Leadership training, strategic planning, and related leadership capacity building	\$162,327	7%
Intern programs	\$161,702	7%
Technology upgrades (e.g., audiovisual equipment)	\$152,610	7%
RGI Coordinator travel and other travel prep/assistance for regional employees	\$88,368	4%
Sustainable building master plan (one Region)	\$80,000	4%
Use of helicopter for coastal monitoring program (one Region)	\$50,000	2%
Improving information proficiency of regional employees	\$29,000	1%
Human resource position classification	\$23,595	1%
Statistical support to support science council	\$14,830	1%
Recognition events (e.g., post natural disasters)	\$7,731	0%
Other**	\$102,019	5%
<b>Total General Support Funding</b>	<b>\$2,182,340</b>	<b>100%</b>
<b>Total Funding (RGI-Wide, FY 2005-2007)</b>	<b>\$16,159,816</b>	<b>13.5%</b>

\* The Senior Environmental Employment (SEE) Program provides an opportunity for retired and unemployed older Americans to share their expertise with EPA. To implement this program, EPA and other Federal and State environmental offices fund cooperative agreements with national aging organizations. SEE workers are not federal employees, nor are they employees of the grantee organization. They are SEE Program enrollees/participants. For more information, see: <http://www.epa.gov/ohr/see/brochure/index.htm>

\*\* Other projects were all \$10,000 or less and are listed with the other projects in Appendix 7

**Figure ES-5. Distribution of RGI Projects by Funding Vehicle (FY 2005-2007)**



**Table ES-2. Distribution of RGI Projects by Funding Vehicle (FY 2005-2007)**

Funding Mechanism	# of Projects	% of Projects Funded	Amount Funded	% of Total Amount Funded
Competitive Grant	155	32%	\$ 6,931,091	43%
Contract	164	34%	\$ 4,473,531	28%
Non-Competitive Grant	46	9%	\$ 1,884,075	12%
Cooperative Agreement	51	10%	\$ 1,461,174	9%
Inter-Agency Agreement	17	4%	\$ 745,557	5%
Procurement Request	53	11%	\$ 664,388	4%
<b>Total</b>	<b>486*</b>	<b>100%</b>	<b>\$ 16,159,816</b>	<b>100%</b>

\* The total number of projects is slightly higher than reported elsewhere because within the RGI database a small number of projects contained more than one entry in the “funding vehicle” data field (e.g., “Contract and Procurement Request”). Percentage figures were calculated by counting multiple funding mechanism entries individually and dividing the amount of project funding evenly among the number of funding mechanisms listed.

### *RGI Audiences and Communication*

**RGI’s audiences** include EPA’s senior leadership at Headquarters and the ten Regions, Congress, the White House, funding recipients and partners, government public affairs personnel, NGOs, and interested members of the public. Despite the use of multiple methods of communication about RGI and RGI projects, **communication with these audiences was insufficient to convey RGI’s role or accomplishments, or to address concerns about how RGI funds were spent.** Awareness and understanding of RGI was strongest within each Region about the RGI-funded projects in that Region only. Senior managers in all Regions had first-hand knowledge of their Regions’ RGI-funded work, and many had clearly invested their time and energy into RGI-funded projects during their tenure. Managers at Headquarters were much less familiar with the practices surrounding RGI or results of RGI-funded projects. One comment made by an interviewee captures the overarching sentiment of many evaluation participants regarding RGI communication: “Everyone is aware of RGI but not of its results.”

Other factors appear to have also confounded the understanding of and communication about RGI. First, there was significant confusion about whether RGI was a “program” or a “funding source.” Although these terms are not formally defined in the Agency’s lexicon, it was clear that most evaluation participants viewed RGI as either a program or a funding source, and that this distinction (consciously or not) led to expectations about RGI’s objectives, implementation approaches, and communication needs. Several interviewees discussed how confusion about RGI’s identity in this regard was behind many of RGI’s troubles. For example, *programs* are often “branded” to promote name recognition and to give credit for accomplishments, and they involve consistent reporting usually with a set of identified performance metrics. RGI, however, was most often viewed as a *funding source* that did not entail the same need for name recognition and did not have the same types of reporting requirements or performance metrics. Further, approaching RGI as a funding source may have led to a greater variety of fund uses and types of expenditures. The range of expenditures in turn contributed to the communication gap about RGI and became an RGI vulnerability.

Second, in many cases, RGI resources “seeded” further funding, leveraged outside funding, or otherwise funded only a part of larger projects, making it difficult to isolate and feature the RGI role, or to attribute RGI expenditures to the achievement of specific outcomes or results.

Finally, regional decision making around the allocation of RGI funds, particularly for general regional support expenses and the EPP sub portion of RGI, further exacerbated the confusion and consternation.

### *Other Findings Regarding RGI Practices*

Other findings regarding RGI practices include the following:

- **Each Region used its own process to select which projects to support with RGI funds, though** all Regions used RGI national mission and criteria and (formal or informal) regional priorities to guide decision making around use of RGI funds. At least five of the Regions used an external competition to solicit proposals for a significant portion of the RGI funding, and the remaining had either formal or informal RFPs that were internal to their Regions. Some Regions employed extensive project selection processes, such as scoring proposals based on a set of pre-identified competitive ranking criteria. In some Regions, individual projects were also funded through an external competition, and in many cases these projects also received funds from other Agency sources.
- Analysis of the **distribution of RGI funds by amount per project** showed that the average project budget was \$34,400 and the median was \$21,600. These amounts do not account for other sources of funding for the same projects.
- The most common **general project topic areas** were water and air, followed by pollutants, toxics and contaminants, public and children’s health, waste and recycling, agriculture, and energy.
- In terms of **geographic area and scale** of RGI projects, the largest percentage (33 percent) was focused at the city, town, or local municipality level. State-level and Region-wide projects were also common (19 percent each), followed by projects that focused on particular watersheds (10 percent) and county-level projects (7 percent).
- Regions were allowed the **flexibility to disburse RGI funds over a two-year period**. Evaluation participants had differing views about whether this flexibility had overall positive or negative

effects. Most Regions were trying to speed up funding obligations so that they would not extend into the second funding year.

- **Despite concerns raised about past RGI spending, no clear examples of policy or rule violations or other misuse of RGI funds were identified by participants or evaluators.**

Several suggestions for implementation improvements in each of these areas were identified for future consideration.

## Options for the Future

### *A Future with No Regional Flexible Funding*

Regional evaluation participants were also asked what would happen if there were no RGI or other equivalent regional flexible funding. They described how they would need to ask each NPM for media/program-based funding for work previously supported through RGI, and that funding obtained through this route would be piecemeal and resource-intensive to obtain, particularly for multi-media needs. Most regional participants thought that the effort it would take to do so would generally not be worth it, and as a result, regional priorities focused on agriculture, non-point source pollution, smart growth and green building, innovative approaches and technologies, stakeholder collaboration, and sustainability would not be effectively supported. A substantial majority of regional participants were significantly concerned about a future with no flexible regional funding like RGI provided.

Headquarters participants had a range of perspectives on whether and how regional needs met by RGI could be met in the future without regional flexible funding. Some thought that those needs could be met through the national programs, whereas others cited an argument for separate regional funding for RGI-like regional priorities. Several Headquarters participants focused more on ideas about how to try to address regional needs through alternative funding approaches like those described below.

### *A Future with Some Kind of Regional Flexible Funding*

Regions were also asked to share their thoughts about a future with an RGI-type of funding source. When asked what they would like to focus flexible regional funding on in the upcoming years, they cited efforts like those listed in Table ES-3 that reflect some of the common themes of past RGI-funded work as well as some new specific project ideas. In response to the questions, “To best meet regional needs, what attributes should a new flexible regional funding source have?” the most commonly and ardently cited “attribute” was regional flexibility in decision making, followed by ideas on how to promote a consistent and transparent process that could be tied more clearly to Agency priorities at the national and regional levels. Several participants also reiterated how they thought that improved communication between the Regions and the national programs could improve collaboration on multi-media challenges, innovative approaches, and other RGI-like priorities. Another theme that arose was an interest in increased regional representation and leadership within the senior management at Headquarters – that a regional “champion” is needed.

### *Options for Consideration*

The final findings cover five hypothetical options for future regional funding support for the Agency’s consideration. Evaluation participants discussed these options in response to the evaluation questions,

though notably they are simply *ideas* that would need substantial discussion, review and, likely revision, before becoming truly viable options to even propose internally, let alone propose to appropriators or implement. They are also some of the many options that would be available to the Agency.

**Table ES-3. Ideas Shared by Regional Participants on Projects that could be Supported by (Hypothetical) Future Regional Flexible Funding**

Analyzing ecosystem services / natural capital
Climate change mitigation
“Green” energy production and development options
Strategies for reducing non-point source pollution
Developing capacity for communities and local governments to address climate change and population growth
Environmental justice work
Estuary programs
Fostering innovative approaches and technologies
GIS work/mapping
Human exposure monitoring
Monitoring water quality
Pilot project to share air quality best practice measures amongst petroleum producers
Ports initiatives
Technical assistance to local governments
US-Mexico border initiatives
Watershed restoration efforts

*Option 1: A Reinstated RGI with no Major Changes*

Most participants thought that the former RGI approach would be a non-starter because changes would be needed to make a future funding source viable given past concerns and current realities. To begin with, the category of “general regional support” funding would either need to be clearly separated from environmental priority project work or be eliminated altogether. Beyond that, additional process improvements would likely be needed, including clear connectivity to Agency national and regional priorities and improved communication to key audiences to allay past concerns. These changes alone make a strong case for the viability of *other* options.

*Option 2: A Revamped Regional Flexible Funding Source*

This option could involve:

- Eliminating the option of funding general regional support through this mechanism;
- Tuning but not dramatically changing the national criteria as per the recommendations in this report;
- More transparency and accountability in decision making and related practices;
- Tying projects and their results to Agency priorities;
- Improving communication to key audiences; and



- Otherwise maintaining regional decision-making flexibility (e.g., on projects funded, funding vehicles used, size of awards, etc.)

This option would entail making several process and reporting changes, but would keep the overall role and function of RGI with the exception of eliminating the option for supporting general regional needs that are outside of the national criteria. The focus would be more on the *process* for use of the funds rather than on what (specific topics) the funds should be spent on. Other suggestions offered in this report, such as working to speed up fund obligation in the first year, and balancing reporting requirements with the scale and nature of the funding, would be feasible. Nearly all regional interviewees and a majority of Headquarters interviewees supported some version of this general option, with some variation on specifics.

*Option 3: A National Funding Source for the Regions that is Co-led by Headquarters and the Regions, and Implemented and Managed by the Regions*

A third option would be to institute a regional flexible funding source that is co-directed by the Regions and Headquarters, but implemented and managed by the Regions. Each year the regional leaders and a group of Headquarters leaders (possibly including the NPMs) could propose a regional flexible funding source that would address the types of place-based needs, multi-media challenges, and other RGI-like regional priorities that are not typically funded through the national programs, but are of interest to the Agency's larger mission and set of priorities. Parameters for use of the funds could be jointly established and could include: (1) Establishing jointly agreed upon general guidelines on the types of projects that would be funded, but without prescribing specific topics; (2) Establishing procedural guidelines about funding vehicles, project selection, timing of funding obligation, reporting, etc.; and (3) Establishing what accountability and internal Agency oversight would entail.

Participants who considered this option pointed out that there may be precedents within the Agency for this kind of approach; however, the existing programs that resemble this general model may be focused on particular grant programs (e.g., CARE), not on funding sources. It is also unclear whether this option would address the major concerns raised about RGI in the past or if the Regions would be genuinely interested in this option if the "burden" of pursuing it would not be worth the flexibility and other benefits that they would receive in return.

*Option 4: A National Program for Regional Projects that is Directed by Headquarters and Competed and Implemented by the Regions*

This option would create a program that would involve substantially more input, management, and direction from EPA Headquarters, but would continue to be implemented by the Regions. This program would not necessarily be a *grant* program per se, as funds could continue to be spent through other vehicles, and the Regions could also use the funds to support internal Agency work on regional priorities. Suggestions raised by participants related to this option included:

- Managing the program through a consolidated competition at the Headquarters level;
- Establishing categories of possible projects based on priorities identified by the Regions and Headquarters (likely including the NPMs). These could include sustainability, innovation, agriculture, etc.;
- Holding part of the funding for emergency regional needs that can be tapped on an "as needed" basis or only during a second optional funding year;

- Requiring that all projects be aligned with one or more of the national (NPM) measures in the NPM guidances.

One variation on this option suggested by a participant was holding a fixed amount for each Region to use in accordance with the guidelines, and competing the remaining funds amongst the Regions.

In general, it is unclear whether this option would actually meet the regional needs that regional participants repeatedly stated were Region-specific and could not be dictated or pre-identified at the national level. Further, this option may not be of real interest to the Regions if it entailed a cumbersome process or was otherwise so regimented and restrictive that the effort would not be worth the result. On the other hand, this option may be more likely to work within the accepted annual budget planning process and would also be more likely to address past concerns than would other options that might “look and feel” to RGI’s critics more like the RGI of the past.

#### *Option 5: All Funding through National Programs (i.e., the Current Status Quo)*

This option is the same as the current *status quo* for FY 2009 and FY 2010; that is, there is no RGI, and funding for regional environmental projects is accessed exclusively through the national programs. As has been described throughout this report, those who participated in this evaluation from the Regions thought that a variety of regional needs and priorities cannot be funded or advanced in this scenario. This status quo option was favored by some of the interviewees at Headquarters who have had the most direct contact with Congressional appropriators. The primary reasons for this option, they explained, were first that appropriators were not going to fund anything that resembled the RGI of the past, and second, that in this time of significant Agency budget cuts, there would no longer be any discretionary funding allowed within the Agency. Instead of a “reinvented” RGI, they favored administering all regional funding through national program channels and thought that the most important regional needs could and should be funded this way.

#### ***Final Observations***

The Agency staff who participated in this evaluation felt strongly (one way or another) about RGI. The regional participants across the board passionately described a need for some kind of RGI-like funding to do what they view as mission-critical environmental and public health protection work. RGI critics clearly believed that too much discretion had been exercised with RGI funds and that the expenditures did not clearly result in accomplishments that supported Agency priorities. Some key audiences have not been well informed about how the Regions made decisions on spending RGI funds, what were allowable expenditures, what the funds were actually spent on, or what was accomplished (or not) with those funds in support of the Agency’s priorities.

If the Agency decides to pursue regional funding of this nature in the future, the regional and national program leadership would benefit from coming together to work through the challenges and tradeoffs in a way that builds trust and identifies important needs that are not currently being met through other means. It appears that the RGI of the past is gone – and a new funding source or program, complete with a new name and identity, would need to be born. Most likely, a collaborative process of identifying ways to meet both national and regional priority needs would facilitate creative dialogue about how to solve some of the nation’s most complicated multi-media problems, emerging issues, and under-funded environmental needs in a “win-win” manner for the Agency on the whole and for the environment it is working to protect and restore.

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# 1. Introduction

The purpose of this evaluation is to identify Regional Geographic Initiatives' (RGI) role, practices, and accomplishments, and to use the insights gained from the past to identify what improvements could strengthen any similar future regional funding source. The evaluation was designed around six overarching evaluation questions (Figure 1 and Appendix 1).

## 1.1 Regional Geographic Initiatives

EPA established RGI in 1994 to support EPA regional offices' place-based approaches to environmental risks. These risks, identified in a 1991 regional assessment, were unique to the Regions and were not addressed through existing national programs. RGI was designed to address these complex environmental challenges through integrated, multi-media approaches. RGI-funded projects have since involved a wide range of stakeholders from public and private sectors to address an array of local, state, and regional environmental challenges. RGI was grounded in a national mission statement and set of national criteria (Figure 2).

RGI received national funding ranging from 10.8 million dollars in FY 1994 to 8.4 million dollars in FY 2007 (Figure 3). The largest annual funding amounts were 12.7 million dollars in 1995 and 12.4 million dollars in 1996. RGI annual resources included expense money for both Headquarters and Regions for travel, salaries and projects. Once salaries were covered for both Headquarters and Regions, the remaining resources were divided equally among the Regions. Headquarters did not receive any resources for projects. Each Region had the responsibility to administer (obligate) RGI funds within a two-year period. RGI funds supported projects through the following funding vehicles: contracts, grants, inter-agency agreements, and cooperative agreements.

Many RGI projects were components of larger Agency programs, and the Regions used RGI to further Presidential, Administrator, and Agency initiatives such as children's health, watersheds, clean air, pollution prevention, environmental justice, and environmental stewardship. (In the context of this evaluation, RGI "projects" refers to all work that was funded through RGI, even though some of the work – trainings, outreach, purchasing of new technology – was not "project" in nature.) RGI was the only source of flexible funding the Regions had to make real-time decisions and apply resources to local needs or emerging issues.

### Figure 1. Overarching Evaluation Questions

1. How do RGI projects align with the RGI criteria and mission and reflect regional and national goals and priorities?
2. What is the process for selecting and funding RGI projects?
3. How are RGI outcomes and results identified and measured?
4. How are RGI outcomes and results communicated to different audiences and how could communication be improved?
5. What changes might be appropriate for a regional flexible funding source?
6. What alternative approaches should be considered for addressing flexible regional funding needs?

In 2007, in response to a request from the U.S. Congress, House Appropriations Committee<sup>4</sup>, EPA developed a *Report to Congress on Regional Geographic Initiatives for FY 2005, FY 2006, and FY 2007* (Report to Congress). Submitted by EPA in March 2008, the 450-page Report to Congress listed each RGI project with a summary of the amount funded, criteria used to select the project (from the national RGI criteria – see below), and project accomplishments. Congress eliminated RGI funding in FY 2008; however, \$1.0 million was reprogrammed to fund RGI full-time equivalents (FTE) in that year. The FY 2009 Omnibus language passed by Congress in March 2009 states that RGI was not funded in FY 2009 due to, “continued concerns about the scope and purpose of the program.”<sup>5</sup>

## 1.2 Intended Audiences

The results of this evaluation are intended for several audiences, primarily EPA senior leadership, RGI staff and management, OMB, and interested members of the U.S. Congress. EPA senior leadership includes the EPA Administrator and Deputy Administrator (DA), National Program Managers (NPMs) and their Deputies, the EPA Chief Financial Officer (CFO) and other senior staff within the Office of the Chief Financial Officer (OCFO), Regional Administrators (RAs), and Deputy Regional Administrators (DRAs). RGI staff includes the RGI Coordinators and Project Officers in each EPA Region, and the RGI national managers in the Office of Regional Operations (ORO) located within the Office of Congressional and Intergovernmental Relations (OCIR). The OMB audiences are those representatives who are responsible for oversight of EPA’s budget. Members of Congress include those who have inquired about RGI in the past or who may become interested in RGI in the near future. Other secondary audiences who may be interested in the results of this evaluation are EPA Regional Division Directors, Branch Chiefs, and EPA and non-EPA recipients of RGI funding.

**Figure 2. RGI National Mission Statement and Criteria**

### **RGI Mission Statement**

*The Regional Geographic Initiative (RGI) funds unique, geographically-based projects that fill critical gaps in the Agency’s ability to protect human health and the environment.*

### **RGI Criteria**

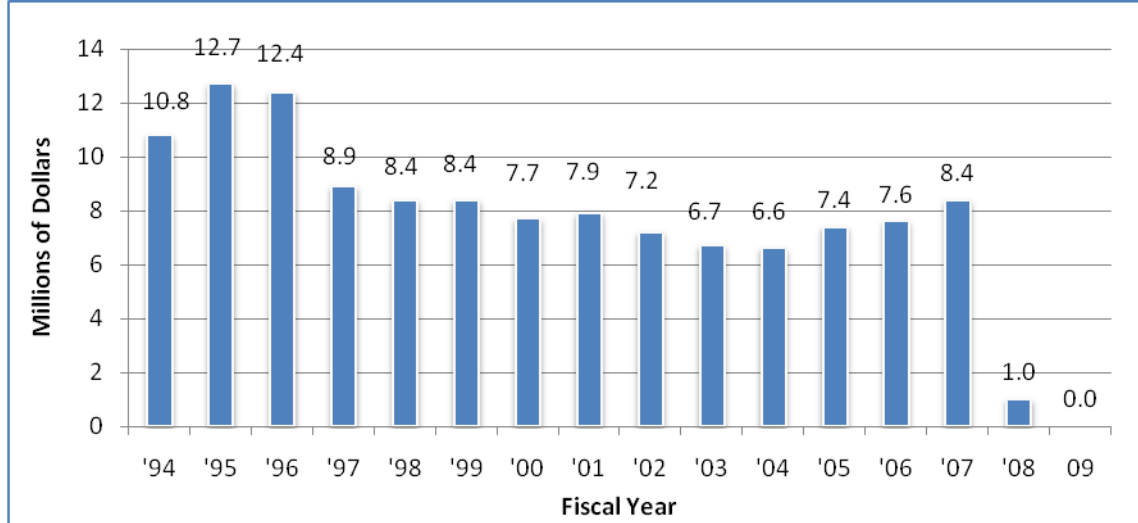
RGI projects:

- Address places, sectors or innovative projects; and /or
- Are based on a regional, state or tribal or other strategic plan; and/or
- Address problems that are multi-media in nature or fill a critical gap in the protection of human health and the environment and/or
- Demonstrate state, local and/or other stakeholder participation; and/or
- Identify opportunities for leveraging other sources of funding; and/or
- Establish or identify baseline data; and/or
- Measure environmental outcomes (actual or potential).

<sup>4</sup> H.R. 20643, Consolidated Appropriations Act for 2008 and House Report 110-187 accompanying the FY 2008 Department of the Interior, Environment, and Related Agencies Appropriations Bill

<sup>5</sup> [http://appropriations.house.gov/pdf/2009\\_Con\\_Statement\\_DivE.pdf](http://appropriations.house.gov/pdf/2009_Con_Statement_DivE.pdf) (page 38)

**Figure 3. RGI Funding FY 1994 - FY 2009**



Note: In FY 2008 RGI funding was eliminated; however Congress approved \$1.0 million of “reprogramming” funds to support FTE in that year.

### 1.3 Sources of Data and Evaluation Methods

This section provides a brief overview of methods used to conduct the evaluation and sources of data used in this report. Appendices 1 and 2 provide more detailed information on these topics.

#### *Information Collection*

Employing a “mixed-methods” approach, the contractor team based the evaluation on information collected from existing reports and resources, interviews with key EPA regional and Headquarters staff, surveys completed by the regional RGI Coordinators, and analysis of data contained in the RGI database. The information used was both quantitative, such as project facts and funding amounts, and qualitative, such as individuals’ knowledge and perspectives.

EPA provided several existing information sources:

- Data set exported from an EPA database with information on each RGI project funded for the last several years (hereafter, the “RGI database”), converted to Microsoft Excel;
- 2007 Highlights Document: *Regional Geographic Initiatives: Enhancing Environmental Stewardship for Future Generations*;
- 2008 RGI Report to Congress; and
- Miscellaneous RGI data and information supplied by ORO; e.g., organizational charts, RGI “State of the Region” document, etc.

The contractor used the following data collection strategies during this evaluation:

- Interviewing 48 key EPA staff by telephone<sup>6</sup>;

<sup>6</sup> Two EPA Region 10 staff were interviewed in person; the rest were interviewed by phone.

- Surveying 12 RGI Coordinators and other key regional staff via a web-based tool; and
- Gathering additional information on such topics as regional project selection processes.

During the course of the interviews, interviewees suggested additional sources, such as project reports, Web sites, and fact sheets, to provide greater detail on the RGI project selection process. All information sources were considered when conducting the data analysis and developing the final evaluation findings and recommendations. Supplemental sources are included in Appendix 3, Regional Project Selection Processes: Supporting Documents.

### *Interviews with Key EPA Regional and Headquarters Staff*

Following a set of general, agreed upon guidelines the RGI Coordinators and national managers provided a list of recommended interviewees, which included national program managers, Regional Administrators (RAs), Deputy Regional Administrators (DRAs), and other key leaders and program staff from Headquarters and the Regions.<sup>7</sup> The contractor team and EPA worked in concert to target questions toward particular groups of interviewees based upon their relationship to the RGI program. The final list of questions and their intended recipients is shown in the Evaluation Methodology (included in Appendix 1). Based on the suggestions from the RGI Coordinators, interviewees in some Regions had group interviews, though most had one-on-one interviews. A total of 48 individuals participated in 40 telephone interviews.

### *Survey of RGI Coordinators and other Regional RGI Contacts*

Tapping the deep knowledge held by the RGI Coordinators would have necessitated longer interviews for this evaluation. Rather than hold two- to three-hour interviews, the RGI Coordinators requested to answer questions through a written survey. The evaluation team developed the survey on-line using Survey Monkey (<http://www.surveymonkey.com/Default.aspx>), an online application for creating and administering surveys. Ross & Associates downloaded the survey results from Survey Monkey in mid-January, 2009 into a sortable database. A total of 12 RGI Coordinators and other regional contacts participated in the survey.

### *Analysis of the RGI Database and Other Sources of Information*

Data analysis centered on an assessment of the information surrounding 453 RGI projects listed in the RGI national database. Appendix 2, Methodology Addendum, explains how the evaluators identified these projects based on scope of the Report to Congress and Appendix 4 provides a complete list of these projects. This work and the additional assessment of supplemental project information needed to fill gaps in the RGI database and regional process information that went beyond what was in the database are described below. These data sources were considered in relation to the survey and interview results.

The RGI database is used within EPA to track multiple elements of RGI projects, including the amount funded, the funding vehicle, whether the project leveraged additional funding, and stakeholder participation. The evaluation team selected several data fields within the database for analysis. The

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<sup>7</sup> In some cases, former DRAs and former RAs were interviewed. They are referred to as DRAs and RAs in this report; former RGI Coordinators are referred to as RGI Coordinators; etc.

evaluation team analyzed a full data set from the RGI database, as provided by EPA. RGI database queries are available for export to Lotus Notes; ORO supplied an exported data set in Microsoft Excel for analysis. After receiving the exported data set, the evaluation team narrowed its analysis to RGI projects in the FY 2005 – FY 2007 time frame in order to (1) examine the same project universe as the RGI Report to Congress; (2) not rely on information in the database for earlier fiscal years as this information was less thoroughly or consistently populated; and (3) avoid incorporating FY 2007 information that was entered in after the Report to Congress because there was incomplete data population for this more recent time frame.

It is important to note several weaknesses inherent in the RGI database and the consequent caveats that should be considered within the context of the database analysis. One of the most critical caveats to consider relates to the analysis of outputs and outcomes. During the analysis of the RGI database the evaluation team attempted, to the best of its ability, to quantify outputs and outcomes of RGI projects. The evaluation team encountered significant difficulty in quantification, partially due to limited RGI project scopes with respect to data collection, both baseline and post-project. In many instances RGI project descriptions included expected environmental outputs or outcomes, but the data component to quantify such results was not explicitly built into the project scope. For example, an outreach program targeting migrant farm worker health was likely to result in a decrease in pesticide exposure and improved public health, but pre-project baseline data and post-project data collection were not components of the project. The results may have been captured through other EPA data collection, but connectivity of this data to the RGI project was not established and/or was too difficult to isolate from other factors. Furthermore, RGI projects by their nature cut across multiple environmental and public health sectors and did not easily lend themselves to standard data collection practices.

The database analysis was also limited by variations in quality, consistency, and interpretation of various fields. For several projects information in the database was simply incomplete and the evaluators were unable to glean the missing information by analyzing other information present (e.g. project summary field, accomplishments field, etc.). In addition, there appeared to be different interpretations of the database field code definitions between individuals entering the data; for example, the field code for the project's connection to EPA's Strategic Plan sub-objectives was populated with "All" for several projects rather than a description of specific sub-objective linkages.

The evaluation team approached the database analysis with several considerations in mind:

- The analyses were conducted to the extent information was available in the database. Some of the data summaries and interpretations done for this evaluation were inferred or extrapolated from fields in the database. Other items correlated directly with fields in the database but those fields were not completely populated or consistently populated, making a complete analysis impossible.
- Any assumptions or judgment calls made by the evaluators are noted and communicated in this report where applicable to the extent that they affect conclusions or recommendations.
- The output of the analyses is primarily summaries (totals, percent, averages, etc.) by Region and for the nation, for FY 2005 - 2007. Some additional text explanation or examples are also included where needed.
- The evaluators used discretion when deciding whether to analyze supplementary information such as reports or other documentation provided by interviewees as feasible and appropriate. Evaluators documented all such supplemental inputs and described how they were used.



Before analyzing the database, the evaluation team worked with ORO and the RGI Coordinators to fill in as many data gaps as possible. This multi-step effort is described in greater detail in Appendix 2: Evaluation Methodology Addendum.

### *Additional Research on Regional Project Selection Processes*

The evaluation team learned through the interviewees and surveys that each Region followed its own project selection process; however the specific process followed was not completely conveyed in the interviews or RGI database. The evaluation team therefore requested (through ORO) process descriptions and example documentation (e.g., RFPs) from each Region. The examples sent back from each Region included RFPs, Web site references, internal guidance memos, etc.

### *Data Management and Synthesis*

Ross & Associates entered the results of the interviews and surveys into a database for sorting, analysis, and exporting/reporting. Results were sorted by EPA Region and stakeholder group, and some responses were also sorted by additional detail (e.g., all “yes” responses to a particular question) to further explore information patterns. Common themes and notable outliers were identified from the interviews and surveys and analyzed to draw conclusions for the final report. To the extent possible, information provided by stakeholders was corroborated by information in the RGI database and other written materials, and instances where the existing information and interview results support or contradict each other were noted. Incongruities or inconsistencies in stakeholder perspectives were also noted, analyzed, and resolved where possible. IEc and Ross & Associates drew final conclusions based on the entire set of inputs (existing information, interviews, and surveys), including an analysis both within each overarching question area and across all overarching questions.

## **1.4 Report Organization**

The organization of this report is intended to “tell the story” of RGI in the context of this evaluation. Following the Introduction, which includes an overview of the evaluation approach, the findings begin in Chapter 2, RGI Role, Accomplishments, and Alignment with Agency Priorities. Chapter 3, RGI Practices, explores how the Regions implemented RGI, including project selection processes, funding vehicles used, project topics, and information collection and communication. Chapter 4, Options for the Future, concludes the report with a discussion of (hypothetical) options for RGI-like future regional funding.

The report follows a different order than the evaluation’s overarching questions because it became clear to the evaluators during the interviews that the order of the overarching questions was somewhat repetitive and not intuitive, and also did not focus first on those “burning” questions that people seemed most focused on. See Figure 4 for a crosswalk of the overarching questions and the location in this report where those questions are covered.

**Figure 4. Crosswalk of Evaluation Questions and Report Chapters**

<b>Overarching Topic Question</b>	<b>Overarching Evaluation Question</b>	<b>Chapter(s) Where this is Covered in the Final Report</b>
MISSION, CRITERIA and NEED	How do RGI Projects Align with the RGI Criteria and Mission and Reflect Regional and National Goals and Priorities?	Chapters 1, Introduction, and Chapter 3, RGI Practices
RGI IMPLEMENTATION	What is the Process for Selecting and Funding RGI Projects?	Chapter 3, RGI Practices
RESULTS and ACCOUNTABILITY	How are RGI Outcomes and Results Identified and Measured?	Chapter 2, RGI Role, Accomplishments, and Alignment with Agency Priorities
COMMUNICATION	How are RGI Outcomes and Results Communicated to Different Audiences and How Could Communication be Improved?	Chapter 3, RGI Practices
IMPROVEMENT OPPORTUNITIES	What Changes Might be Appropriate for a Regional Flexible Funding Source?	Chapters 2 and 3 (under “suggestions for improvement”) and Chapter 4, Options for the Future
NEW APPROACHES	What Alternative Approaches Should be Considered for Addressing Flexible Regional Funding Needs?	Chapter 4, Options for the Future

## 2. RGI Role, Accomplishments, and Connectivity to Agency Priorities

### 2.1 Summary Findings

The evaluation’s overarching questions (Figure 1), which formed the basis for this evaluation, did not explicitly focus on RGI’s role or accomplishments. These topics were, however, explored in the evaluation and, due to their importance in the bigger “RGI equation,” they are the first focus of this report.

Evaluation participants<sup>8</sup> described how the Regions sought RGI funding because, generally speaking, they had no other viable funding source to support unique regional priorities and needs. Regional participants clearly stated that RGI played an important role in filling a gap in the Agency’s funding for geographically based needs, other regional environmental needs, and in some cases, general regional support. Regional participants and some Headquarters participants described a “constellation” of roles RGI played (Figure 5 and section 2.2, below). Notably, some Headquarters participants were skeptical that RGI played this or any important role in the Agency’s work. Generally speaking, they thought that the work funded through RGI either was not sufficiently reflective of the Agency’s priorities, did not demonstrate identifiable results to support those priorities, and/or that RGI-funded work could be funded through the national programs. This was the “minority” perspective amongst those interviewed for the evaluation.

RGI results and accomplishments have been reported in EPA’s RGI database since 2003 for nearly all RGI projects, and interviewees also shared their thoughts on RGI’s main accomplishments. Regional interviewees provided numerous examples of accomplishments of which they were proud. By contrast, few Headquarters participants were able to identify more than a few RGI accomplishments and those accomplishments were based largely on anecdotes rather than reports or other “concrete” sources of information. The evaluators examined the copious information available on RGI results through the interviews and RGI database and were able to clearly identify several kinds of general RGI accomplishments (both anticipated and completed) in addition to specific accomplishments resulting from individual RGI projects.

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<sup>8</sup> “Participants” refers to interviewees and survey respondents who provided feedback and ideas on particular topics and questions.

**Figure 5. Findings on the RGI Role**

**RGI:**

1. Addressed place-based needs;
2. Addressed multi-media challenges;
3. Supported national and regional priorities and commitments for which there was insufficient funding;
4. Addressed urgent and just-in-time needs;
5. Worked with targeted, underserved, and/or particularly vulnerable populations;
6. Funded research and development of innovative technologies and approaches;
7. Conducted regional outreach and education;
8. Fostered stakeholder collaboration and relationship building
9. Supported non-regulatory and beyond compliance programs; and
10. Leveraged other sources of funding.

Given the lack of consistent performance reporting and measurement in the RGI database, however, it was not possible to accurately *quantify* RGI accomplishments for all 453 projects analyzed. Similarly, grouping these accomplishments into verifiable and quantifiable environmental results was not possible given the available information.

Nonetheless, findings indicate that RGI funded work achieved accomplishments in

each of the Agency’s priority goal areas. Accomplishments included, but were not limited to, improved stakeholder and community awareness of key environmental challenges and opportunities; improved regional ability to support national and regional goals, priorities, and commitments; improved environmental outcomes such as air and water quality; enhanced ability to test, implement, and educate about innovative technologies, tools, and approaches; and successful reproduction of RGI-funded projects in other areas or nationally. These and other types of RGI accomplishments are listed in Figure 6. Figure 8 provides a more detailed account of the type of RGI accomplishments as reported in the RGI database (anticipated and completed as of the time that the database information was entered).

*“For this [RGI] budget there's an extraordinary amount of work done with the Regions and ORO to document our results and outcomes to justify these funds.... We open our books and we talk about how we use every last dime..”*

*– Regional Administrator*

#### **Figure 6. Summary of RGI Accomplishments\* (Anticipated and Completed\*\*)**

##### **RGI:**

1. Improved stakeholder and community awareness of key environmental challenges and opportunities;
2. Improved EPA and partner / stakeholder capacity to make progress on regional environmental priorities;
3. Improved regional ability to support national and regional goals, priorities, and commitments;
4. Improved regional information management and technological capacity;
5. Improved information and analysis on sensitive and emerging conditions / areas;
6. Improved air and water quality / reduced emissions, pollutant loading, land contamination, etc.;
7. Conducted testing, implementation, and education of innovative technologies, tools, and approaches;
8. Improved land management and watershed, habitat, and ecosystem health;
9. Improved public health and public awareness of environmental health risks;
10. Enabled model projects that were replicated elsewhere;
11. Improved general capacity at the regional level, including providing support for leadership training, internship programs, and travel costs;
12. Leveraged additional funds and provided external funding continuity for projects implemented with RGI “seed” money.

##### *Notes:*

*\* Accomplishments are ordered according to the generally frequency with which they were represented by the RGI projects*

*\*\*Based on interviews and analysis of anticipated and completed RGI project results in the RGI database*

The evaluation also found that, in general, RGI projects supported Agency priorities at both national and regional levels, though this finding is qualified by a lack of detailed information on how precisely RGI projects supported specific priorities other than those at the highest level of the Agency's Strategic Plan (i.e., Goals 1-5). If an equivalent funding source were to be created in the future, the linkage to the Agency's priorities could be more clearly documented and communicated.

*"[RGI] is the only source of funding at the Agency that is multi-media, which ties better with how communities view their environment – holistically rather than single-media... .. even small amounts of money can have far-reaching impacts and can provide seed funding to get efforts off the ground..." – RGI Coordinator*

Additional analysis of RGI's past accomplishments and linkage to the Agency's priorities are beyond the scope of this evaluation; however it would be possible to conduct further research and document these relationships related to RGI's past projects. The larger context for measuring the results of any EPA-funded work could also be considered. For years, the Agency has been working to efficiently and effectively articulate its results and accomplishments using improved metrics and environmental performance measures. Doing so requires a substantial amount of resources. RGI involved a substantial amount of project and performance documentation, particularly in relation to the small size of the RGI budget compared to the Regions' other expenditures. That said, the evaluation findings support the conclusion that documentation and communication of RGI results and accomplishments were ineffective on the whole. Key audiences for this information were not aware of RGI's accomplishments or other relevant information about RGI. These issues are discussed below under "RGI Audiences and Communication."

If an RGI-like funding source were to be reinstated in the future, there would be opportunities to learn from advancements in the area of performance measurement and reporting, to streamline the identification of the accomplishments, and to tie the funding and accomplishments to Agency priorities. The inherent cross-program and multi-media nature of an RGI-like funding source would, however, mean that implementation of these improvements would be a resource-intensive exercise, to say the least, and the Agency would likely want to consider the necessity, costs, and benefits of doing so.

*"The question should be, 'What is the return on the investment?' RGI is not much money; it's a small price for EPA to pay for progress. With no RGI, there would be missed opportunities to address specific community needs or to seed as many important new initiatives that support the national programs and EPA's Strategic Plan; RGI funds have been able to buy significant goodwill with forgotten areas, such as communities with environmental justice concerns, and this capacity would be significantly diminished."*

*– Deputy Regional Administrator*

## 2.2 The RGI Role

Interviewees cited many reasons for why Regions and outside parties seek RGI funding. Most reasons centered on how RGI was the only funding source available to address particular types of geographic or other regionally-based needs. Other funding sources either were not available or were so difficult to

access that the “return on investment” was not worth it. The following multi-faceted RGI “role” can be viewed as the “RGI constellation” of regional needs funded through RGI as identified by participants.

Findings regarding the RGI role. RGI:

1. Addressed **place-based needs** that otherwise do not received direct attention or sufficient support (e.g., U.S.-Mexico border, water bodies such as the Charles River, the Great Salt Lake, and urban areas where there are unique cumulative public health risks).
2. Addressed **multi-media challenges** in areas that do not typically fit well within the Agency’s national media-based programs and that are either inadequately funded or not funded at all by these media-based programs. Examples included agriculture (e.g., confined animal feeding operations, non-point source pollution), energy supply and conservation, watershed and ecosystem health, and public and children’s health.
3. Supported **national and regional priorities and commitments for which there was insufficient funding**, including those supporting priorities identified by the Regional Administrators, worked to achieve annual commitments to the national programs (e.g., state implementation plans), and filled shortfalls in funding for general regional support needs (e.g., computer technology, leadership training).
4. Addressed **urgent and just-in-time needs** that are not anticipated 18 months in advance when EPA plans each federal fiscal year’s budget and corresponding commitments. Urgent needs funded by RGI that were cited by participants include rapid response to court orders, disasters, emerging issues, and fluctuating markets.
5. Worked with **targeted, underserved, and/or particularly vulnerable populations** (e.g., high-risk communities, Pacific Islanders, Tribes, small communities without wastewater treatment infrastructure).

*“One crying need that all the regions have is the ability to conduct environmental studies and use contractors to do it. We have a lot of tools at our disposal but we don't have money to use them.”*

*– Assistant Regional Administrator*

### Example Project: Environmental Education in Schoolyard Gardens

Region 1, FY 2006, \$14,865

The Environmental Education in Schoolyard Gardens project provided residents in Cambridge, Massachusetts with three-season access to all five of CitySprouts urban schoolyard garden sites, as well as with education in the skills needed to grow one's own food.

Project results included free public educational workshops and materials on topics including growing and preparing vegetables and fruits, composting, recycling, identifying soil toxins, and soil remediation; an open community garden provided for 70 weeks over two years; families trained in comprehensive approaches to healthy urban environments in homes and gardens; youth interns receiving training and education about urban environmental concerns, gardening, and community outreach; and educational activities on composting presented in school cafeterias.

6. Funded **research and development of innovative technologies and approaches** (e.g., remote sensing devices, risk assessment models, alternative asbestos methods) and other innovative approaches (e.g., lean "Kaizen" events).
7. Conducted **regional outreach and education** activities (e.g., regional Web site improvements, Earth Day events).
8. Fostered **stakeholder collaboration and relationship building** (e.g., West Coast Collaborative, Blue Skyways).
9. Supported **non-regulatory and beyond compliance programs** (e.g., Environmental Management Systems, voluntary partnerships, green building, climate change mitigation and adaptation, pollution prevention, clean-up of abandoned mines, air toxics in school).
10. **Leveraged other sources of funding** or provided EPA matches to valuable projects or programs.

Several participants summarized their view of the RGI role by referring to the RGI mission statement: *"The Regional Geographic Initiative (RGI) funds unique, geographically-based projects that fill critical gaps in the Agency's ability to protect human health and the environment."*

Not all participants were convinced that RGI played an important role for the Regions or the Agency, however. Some participants from Headquarters described how they viewed RGI's role as the discretionary funding for whatever priorities the Regional Administrators had at any given time. This "vocal minority" of participants explained that they thought this role was not clearly supporting Agency priorities and was on the whole not defensible or sustainable. Nonetheless, this view was not universally held at Headquarters. Several of the senior Agency leaders, including national program managers, senior program staff, and the Deputy Administrator, described how they saw RGI as playing a valuable role in supporting regional needs that were not otherwise funded. The challenges with RGI,

these individuals explained, were less about role than they were about transparency, consistency, and clear connectivity between RGI projects and Agency priorities.

## 2.3 RGI Accomplishments

Although this evaluation was not designed to be a report on RGI accomplishments, one of the questions posed to interviewees was, “What are the main accomplishments of RGI-funded work?” The evaluators quickly realized during the interviews that much of the focus on RGI accomplishments centered around peoples’ perspectives on whether or not RGI achieved worthwhile results that were important to the Agency. Another facet of the RGI accomplishments “puzzle” was the extent to which key RGI stakeholders were or were not aware of what RGI funds were spent on and accomplished. (See also RGI Audiences and Communication in Chapter 3.)

*“RGI, politics aside, is a tremendous program for the Regions. I have personally seen the results of what RGI is able to accomplish. The [main] difference [is having] a little bit of discretionary dollars to be able to react to new harms in the environment without having to go back to HQ ‘hat in hand’ for a few dollars. We are able to create relationships and make decisions and implement programs very quickly. If anything, we have all but lost that ability. It’s a lot harder now. This has long-term implications for the Region.”*

– Regional Administrator

The evaluation explored the accomplishments of RGI-funded work in two ways: first, by reviewing information obtained through the interviews and surveys, and second, by analyzing information in the RGI database, which includes descriptions of anticipated and completed RGI accomplishments as of the time the information was entered into the database. The interview results are covered first, below. Figure 8 provides a more detailed list of the “types” of accomplishments identified from the database analysis. Also, throughout the remainder of the report, 15 individual RGI projects and their accomplishments are briefly described in highlight boxes.

### **Example Project: Collection of Unwanted Household Electronics and Medicines FY 2007, Region 5, \$25,000**

This Great Cities grant agreement between the City of Chicago Department of the Environment and U.S. Environmental Protection Agency-Great Lakes National Program Office helped host a household hazardous waste collection event on April 19, 2008. Residents brought in 75,000 pounds of e-waste, 20,000 pills, and other unwanted household hazardous wastes free of charge for proper management and disposal. The project enabled advertisement of the event in major Chicago newspapers, and was the beginning of an ongoing

These projects include examples cited by interviewees as noteworthy and additional examples selected by the evaluators to demonstrate a representative variety of RGI projects (e.g., across media, scale, and geographic regions).

In general, nearly all regional interviewees said that RGI was an invaluable funding source that filled a clear gap in the Agency’s funding. Several of the regional interviewees, particularly the senior regional leaders, described how they viewed work they did (or supported) using RGI funding to be some of their most important accomplishments during their time



with the Agency. They cited numerous examples of accomplishments like those shown in Figures 6 and 8 and the highlight boxes that briefly describe individual RGI projects.

One of the commonly cited accomplishments was the replicability and “trickle up” of RGI-funded work. Interviewees cited examples of projects that have been reproduced in other Regions and/or have been cited by the national programs as effective or model projects. Some interviewees provided examples of RGI-funded technology, tools, approaches, and projects that had become fully adopted by a national program for implementation or use nationwide (Figure 7). Even though reproducibility was not a formal objective or criteria of RGI, many evaluation participants thought that this facet of RGI underscored RGI’s value, particularly as it related to fostering innovation and collaboration. On the other hand, one national program manager discussed how RGI was never intended to initiate work that would lead to new national programs and thought that this was not an appropriate role for RGI.

**Figure 7. Examples of RGI-funded Work Replicated Regionally or Nationally**

- Workforce recruitment and development for the water and wastewater treatment sector (Region 1)
- School toxic chemicals cleanup program that became a national program (Region 4)
- The “beyond translation” program designed to foster collaboration with Spanish-speaking communities (Region 6)
- Biofuels studies related to FIFRA and agricultural initiatives – prior to national focus on this topic (Region 7)
- Air toxics in schools (Region 9)
- West Coast Collaborative – diesel emissions reduction program, including school bus retrofits (Regions 9 and 10; also undertaken by other Regions)

**Figure 8. Types of RGI Accomplishments (Anticipated and Completed\*)**

Alternative energy research	Development of guidance documents (e.g., healthy home landscapes)	<b>Event sponsorship and/or participation</b> (e.g., Earth Day, flower show)
<b>Best Management Practices Identification and Promotion</b> (e.g., energy development, agriculture, feedlots, low-impact development, stormwater management, TMDLs, etc.)	Development of business plans (e.g., business plan for wastewater treatment regional management)	Expert consultation (e.g., water treatment plant and water supply evaluation)
Biodiesel research	Development of eco-regional maps	Fact sheet development (e.g., watershed modeling fact sheet for county officials)
Capital purchases (e.g. video teleconferencing equipment)	Development of policy recommendations (e.g., for future uses of contaminated lands)	Feasibility studies (e.g., siting renewable energy facilities on former landfill)
Case study development (e.g., documentation of green building project's successes and challenges)	Diesel retrofit programs design and implementation	Field surveys (e.g., Puget Sound pre-spawn fish mortality)
Certification programs (e.g., development of a customized certification program for tree fruit)	Economic analyses	Funding for emissions reduction technology research, development, testing, etc.
<b>Community assistance</b> (e.g., environmental finance center)	Ecosystem restoration	<b>Geographic Information Systems (GIS)</b> (modeling, technology, mapping, etc.)
Compliance assistance	<b>Education and outreach</b> (e.g., educating farmers about Conservation Reserve Enhancement Programs)	Green building and LEED certification
Compliance enforcement	Environmental Impact Statements	Groundwater monitoring
<b>Conference planning, implementation, and/or participation</b>	Environmental Management Systems (development, review, planning)	Growth management strategies
Conservation easements	Environmental "toolkits" (e.g., compliance assessment toolkit for small and medium-sized businesses)	Hazardous waste management
<b>Data collection and analysis</b> (e.g., air emissions, water quality)	Equipment installation, loan, and purchasing programs	Improved coastal habitat
<b>Demonstration projects</b> (e.g., alternative asbestos abatement)	<b>Establishment of stakeholder groups</b> (e.g., on public housing resident health and environmental quality)	Improved green space
<b>Development of environmental indicators</b>		<b>Improved information access, exchange, and management</b> (including information storage, records, and security)

**Bold typeface** indicates that at least ten projects fell into this category in the FY 2005-FY 2007 time frame

\* Based on analysis of anticipated and completed RGI project results, as reported in the RGI database

**Figure 8, Continued\***

Improved partnerships	<b>Pilot projects</b> (e.g., highly photo-chemically reactive VOCs, enforcement for high-emitting vehicles)	Species reintroduction
Increased and improved wastewater treatment	Program development, design, and evaluation	Sponsorship of public meetings
Laboratory certification	Promotion of energy efficiency	Staff hiring planning
Leadership training	Rain barrel distribution	Stakeholder participation
Management planning / plans (e.g., joint State-Tribal Lake Management Plan for Lake Coeur d'Alene)	Recognition ceremonies	Statistical support
Management system audits (e.g., ISO 14001:2004 audit of EPA Region 9's Environmental Management System)	Recycling (e.g., of shredded confidential documents)	Stormwater monitoring and mitigation
Field mapping /maps	Recruitment of community contacts	Strategic planning
Marketing studies (e.g., for community education)	Reduced agricultural runoff	Survey implementation
Mercury distribution analysis	Reduced air emissions / decreased air pollution	<b>Technical assistance</b>
Modeling (e.g., expand a hydraulic model within the New York City Drinking Water Distribution System)	Reduced energy consumption	<b>Tool development</b> (e.g., watershed monitoring and response systems)
<b>Monitoring</b> (e.g., dissolved oxygen)	<b>Reduced greenhouse gas emissions</b>	Trail design and mapping
Native species planting	Reduced nutrient loading	<b>Trainings</b>
No smoking campaign (public health and indoor air)	Reduced permit delays / accelerated permitting	Vulnerability assessment
Operations support (e.g., records management, library)	Reduced stormwater runoff	Water quality monitoring
Outreach and education	Reduced waste generation	Watershed planning, assessment, and modeling
<b>Partnership building</b> (e.g., composting food waste through work with generators (supermarkets, restaurants, growers, etc), haulers and processors (composters))	Regional communications	Web site development and upgrades
	Removal of invasive species	Wetlands restoration
	<b>Report development</b>	Workgroup support and participation
	RFP assistance	Workshop planning, sponsorship, implementation, etc. (e.g., urban rivers conferences)
	River ecosystem survey	
	Site assessment	
	Smart growth strategies	

**Bold typeface** indicates that at least ten projects fell into this category in the FY 2005 – FY 2007 time frame

\* Based on analysis of anticipated and completed RGI project results, as reported in the RGI database

In general, participants from Headquarters had a different set of perspectives on RGI accomplishments than the regional participants. Some Headquarters interviewees commented on how RGI was, in their view, the source of some of the Agency's most innovative and fruitful "cutting edge" ideas and initiatives. Excluding the RGI program staff, other Headquarters interviewees said that they were not aware of what RGI had accomplished other than what they had heard occasionally mentioned at meetings (mostly at EPA Innovation Action Council meetings). Most often they were not aware of specific RGI accomplishments beyond a few anecdotes about how RGI funds were or were not spent. Relatively few of the Headquarters' interviewees were aware that there was an RGI database, RGI Report to Congress, and RGI Highlights Report. (These issues are discussed further under "RGI Audiences and Communication" in Chapter 3.)

*"I believe that a lot of the best ideas come from States and Regions and bubble up. You hear over and over again that this wouldn't have been possible without [RGI] seed funding and letting it grow. I see [RGI] as an important capacity and feeder source."*

*– Headquarters Participant*

The results of the database analysis of RGI are reflected in Figure 6, Summary of RGI Accomplishments, and Figure 8, Types of RGI Accomplishments. These results are as conclusive as the evaluators think possible given the information available as well as the scope of this evaluation. Several challenges surrounding identifying quantifiable accomplishments arose during the course of database analysis:

- The database analysis was based upon a downloaded set of data that provided a "snapshot in time" of RGI-funded activities at the time the information was entered over the past few years. For many projects, results were "anticipated" or not yet entered in the database. In those cases the evaluators relied on an approximation of anticipated accomplishments provided in the project description field of the database.

*"It's important to have accountability for the funds – for every grant, not just RGI. If we're putting money into something we want to get something back. I'm nervous about measures because the projects are so diverse. Is it the number of [people] who come to conferences, or the number who read brochures? These are different than air or water quality measures. I'm in favor of tracking and accountability for projects but not seeing the need for national performance measures. We don't want to lose flexibility."*

*– Deputy Regional Administrator*

- Accomplishments were reported in the database in many different ways. For example, the information and level of detail varied substantially from project to project. This could have resulted from the lack of clear guidance on what to report; however, the evaluators understand that developing a common set of verifiable and consistent performance measures would have required a *major* effort by the RGI managers.
- Many RGI projects were multi-media and/or activity ("output") in nature and quantifiable results for these types of projects are often more difficult to identify. Many RGI projects

focused on outreach and education, capacity-building, building stakeholder agreement, training, and other types of "outputs." Many projects were implemented in one day or were otherwise

small scale and it can be difficult or costly to measure outcomes beyond the fact that they occurred without having pre-made tools to do so (e.g., day-of-event customer satisfaction surveys).

- It was not possible to ascertain with certainty (or at all in some cases) the degree to which additional funding sources contributed to various projects and their results. Since many RGI projects were only partially funded by RGI funds, and often the other funding sources are from outside parties, isolating RGI-funded “results” can be complicated at best. Double counting of results when RGI funding is coupled with other EPA funding was likely, and several participants noted that the results in these cases are often associated with the other EPA programs, perhaps because RGI is less well known or understood or because it was considered a funding source rather than a program.
- Many RGI projects were by design short-term or “seed” projects; identifying results over time based on baseline data was not possible or realistic.
- There did not appear to be quality control or verification of the results in the database, though in some cases the descriptions of results for certain projects suggest that some of results reported were systematically identified by the Coordinators or project officers who entered the information.

**Example Project: Mid-Atlantic Regional Air Initiative  
FY 2007, Region 3, \$100,000**

This initiative supported projects for the City of Philadelphia, the City of Pittsburgh, and the Port of Maryland to demonstrate diesel emission reduction technology in their urban fleets. A total of four projects were designed to reduce diesel emissions in the Mid-Atlantic Region. Two projects reduced diesel emissions from urban fleets in Philadelphia and Pittsburgh while the other two projects reduced diesel emission by retrofitting cranes at the Port of Maryland.

Despite these caveats, the evaluators think that the types of accomplishments identified in this report are reasonable accounts of the results seen by RGI funded work, even though they cannot be concretely quantified.

*“We don't have good metrics for social networking; e.g., talking to the recyclers of America... .. Influencing the dialogue is important... We discount how much time and money it takes to get people together and just getting people to “get it” and agree to something is huge – and we don't have metrics for that... .. How do we measure changing people's minds?”*  
– *RGI Project Officer*

**Example Project: Remediation of Contaminants in K-12 Schools  
FY 2005, Region 4, \$50,000**

This remediation project in Alabama removed 4,220 pounds of chemicals and 60 pounds of mercury from targeted schools. The grantee and EPA found black mold, asbestos, and a 30-year-old chemical repository in a small, poor rural community. Chemical removal was conducted for the County with existing grant funds and volunteer work from partners. The grantee also completed preventive training on chemical storage and disposition for public schools in Alabama and made that training available online to private schools.

This project resulted in significant improvement in the environment in schools in the state of Alabama by addressing chemicals in 110 schools. The project resulted in major environmental improvement in both air and water quality for sensitive populations in the State and improved on the Chemical Cleanout model already developed for the Southeast by the State of Tennessee.

***Suggestions for Improving the Identification of Results***

Participants provided the following suggestions for improving identification and reporting of RGI accomplishments. Some of these suggestions were already implemented in certain Regions or for some projects:

- Articulate as part of the project proposal what the desired (long-term) result or accomplishment will be, even if it cannot be achieved or precisely measured with the current funding (i.e., what is the long-term desired result and how does this project enable or contribute to this result?).
- Identify a reporting threshold for extensive reporting. Participants had a range of perspectives on what the “tipping point” would be, with project dollar amounts ranging from \$10,000 to \$75,000 being the criterion requiring substantive reporting beyond basic project accounting and adherence with existing rules. Similarly, reporting and results measurement activities should be commensurate with a funding source of this nature (in comparison with program funding) and in an appropriate scale relative to the level of funding (i.e., not overly resource intensive for small projects).
- Include a criterion or requirement that all RGI-funded projects be able to identify at least one result that is linked to regional or national priorities. This could be achieved through a logic model submitted as part of a proposal or other tool that facilitates the identification of relevant results measures.
- Prioritize projects for funding that are larger scale and have longer time horizons so that identifying results is more feasible.
- Identify the kinds of “results” for activities such as workshops and trainings that would be considered valuable as contributions to the Agency’s mission. Guidance or templates for measuring and reporting outputs and outcomes for these types of capacity-building and

collaboration activities could be developed. (Note that the Headquarters' participant from the Office of Grants and Debarment described how the Agency is working with the Office of Management and Budget to identify the kinds of performance reporting that would serve this purpose for these kinds of activities as this is a broader challenge within not only EPA but the federal government in general.) It would be helpful to have easy-to-use tools on hand such as "what did you learn" surveys that can be gathered immediately after outreach and education activities.

- Explore other ideas through the Agency's Grant Management Council or other performance measure initiatives. As noted, this measurement challenge is not unique to RGI.

*"I don't think selection is the problem and I don't think having strong outcomes is the problem. I think we need improvement in the area of linking the project outcomes to agency priorities. In most cases the projects are very much in line with NPM stated goals (strategic plan, NPM Guidance, etc.) but we don't have a mechanism to show the relationship... .. Currently there is no way to make the link between the projects and outcomes on a national level. If you fix this, selection and management will take care of themselves." – RGI Coordinator*

Participants on the whole thought that improved identification (not necessarily *more* reporting) of RGI accomplishments was necessary, and that communication of these results to the right audiences in a timely manner was critical and lacking in the past. This last point is discussed later in this report.

## 2.4 Alignment of RGI Projects with National and Regional Goals and Priorities

Through the interviews and RGI database analysis, the evaluation team examined the linkages between RGI projects and EPA national and regional goals and priorities because a lack of clear connectivity was cited numerous times as an RGI vulnerability. The focus of this examination was connectivity with the EPA 2006 – 2011 Strategic Plan which outlines the Agency's priorities five years in advance and is the basis of annual planning and budgeting each year. Participants were also asked about how RGI projects aligned with other, related Agency priorities such as those included in the annual National Program Manager (NPM) guidances.

A majority of interviewees said that the Agency's national goals and priorities clearly influenced project selection. They typically discussed how the Regions' (including the Regional Administrators') goals and priorities are consistently if not inherently tied to the Agency's national goals and objectives. Regional interviewees also underscored the relationship between RGI projects and up-and-coming Agency priorities. They typically raised this topic indirectly, by noting that the Regions often focused their RGI spending on innovative and "cutting edge" or "future thinking" topics that the Agency has subsequently recognized as new Agency priorities. An example is Region 8's focus on agriculture (for several years in a row).

**Example Project: In Harm's Way – Toxic Threats to Child Development**  
**FY 2006, Region 10, \$40,000**

The goal of In Harm's Way was to protect and improve the health of children, pregnant women, and Latinos and reduce the effect of toxic environmental exposures through three primary methods. First, the project provided outreach and education to health care providers in Spanish-speaking, low-income, Tribal, and minority populations. Second, the project conducted presentations to care providers for pregnant women, parents and children. Finally, the project provided educational materials to Latino outreach workers, and trained health care providers to reach low-income and minority populations.

The RGI database analysis involved further exploration of the relationship between RGI project and Agency priorities. There are a number of caveats to consider when analyzing the results on this topic, however. The RGI database included a field to note linkage(s) between the RGI project and the EPA 2006 - 2011 Strategic Plan. Information had been entered into this field for roughly 80 percent of the projects analyzed, but information completeness and level of detail varied. For those projects without a linkage in the RGI database, evaluators assigned a linkage based on other information such as project descriptions (e.g., watershed restoration projects were assigned to Goal 2), except in a few cases where it was not clear which Goal would be most applicable (e.g., leadership training). Such projects as travel support, equipment upgrades, and leadership training were assigned to the "General Enabling and Support" category. Also, it is likely that Goal 4, Healthy Communities and

Ecosystems, was entered in many cases as the "default" because this is where RGI appeared in the Agency's formal goal structure and annual budget. Further, as noted previously, most projects could fit within multiple Plan goals – a point that several interviewees also raised during the interviews. In other words, it is not difficult to find a "home" for most projects (RGI or otherwise) somewhere in the Strategic Plan.

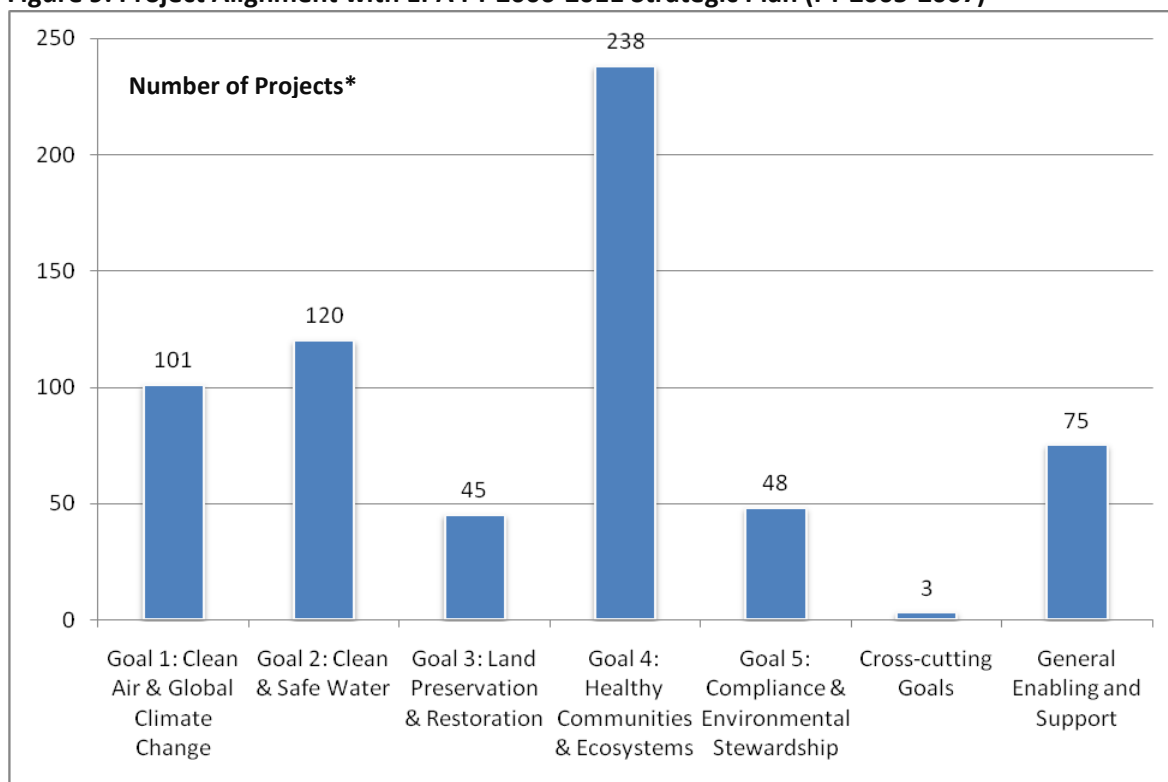
With these caveats in mind, evaluators found that, **on the whole, RGI projects aligned with the Agency's highest level priorities and most also aligned with more specific Agency priorities found in Strategic Plan and National Program Manager (NPM) guidances.** Analysis of results (Figure 9) show that most projects supported Strategic Plan Goal 1 (Clean Air and Global Climate Change), Goal 2 (Clean and Safe Water), and/or Goal 4 (Healthy Communities and Ecosystems). Goal 3 (Land Preservation and Restoration) and Goal 5 (Compliance and Environmental Stewardship) were also represented, and a few projects had the identifier "cross-cutting goals. Further, many RGI projects were "ahead of their time" – supporting work in areas that have only recently become focused upon more broadly by the Agency at the national level. Examples include projects that focused on climate change mitigation and adaptation, watershed assessment and restoration, and lean and environment projects.

Participants from all Regions described how the RGI projects in their Regions clearly aligned with their Regions' priorities. All regional interviewees indicated that RGI was one way, and in some cases the primary way, that the Regions funded regional priorities, and all said that regional priorities influenced project selection. Researching the specifics of each Region's priorities and how these cross referenced with the 453 projects analyzed for this evaluation was outside of the scope of this evaluation. However, Appendix 3 ( Regional Project Selection Processes: Supporting Documents) provides a substantial amount of information about the relationship between regional priorities and RGI projects.



Most projects that clearly supported environmental protection also supported at least one Agency priority expressed in the Strategic Plan or elsewhere. Several interviewees pointed out that it is not hard to match projects with the Strategic Plan, particularly at the Goal level. At the same time, many RGI projects did support specific priorities, and this linkage was sometimes noted in the RGI database.

**Figure 9. Project Alignment with EPA FY 2006-2011 Strategic Plan (FY 2005-2007)**



\* Goal categories are not mutually exclusive since projects often related to multiple Goals.

Looking forward, if a regional funding source like RGI were to be established in the future, there are options for more clearly demonstrating linkages to Agency priorities. One option could be identifying the priorities that would be supported as part of the Agency’s annual budgeting process, though this could take away from the ability to address real-time needs. Another option would include a commitment (with some checks and balances) to supporting particular Agency priorities with the funds, coupled with a process to demonstrate that connectivity before and while those funds were being spent. Reporting after funds have been spent on project accomplishments and how those accomplishments support Agency priorities is likely to be a basic requirement for any future funding of this nature, and this will help to demonstrate the value of this kind of funding source. There are ways to create a project reporting system that will facilitate documentation of specific linkages to Agency priorities in a way that is both precise and not cumbersome for the users.

Finally, during the evaluation it became clear that communication between the Regions, national programs, and the Agency’s senior leadership on how these funds have supported Agency’s priorities and specific national program goals was sparse as best. In the future, if a similar funding source were to be created, the Agency would benefit from more and improved communication across the board so that the connectivity between national and regional priorities would be clearer.

## 3. RGI Practices

### 3.1 Summary of Key Findings

Four of the six overarching evaluation questions<sup>9</sup> focused on RGI's implementation practices. Interviews included additional detailed questions about specific practices such as whether two-year funding implementation was important and valuable. This chapter describes the findings in response to these questions and includes suggestions for implementation of process improvements should a funding source like RGI be reestablished.

Key findings on RGI practice areas are:

- All Regions used **RGI national mission and criteria** to guide decision making for RGI funds and most projects met between one and four of the seven national criteria (Section 3.2).
- Participants had widely divergent ideas about **perceived or actual “discretionary” use of RGI funds** (Section 3.3). Many participants indicated that misunderstandings about the discretionary use of RGI funds, coupled with lack of knowledge and communication about RGI processes and results within the Agency, **undermined support for RGI**. No clear examples of policy or rule violations or other misuse of RGI funds were identified by participants or evaluators.
- **Each Region used its own process to select which projects to support with RGI funds** (Section 3.4). At least five of the Regions used an external competition to solicit proposals for a significant portion of the RGI funding, and the remaining had either formal or informal RFPs that were internal to their Regions. Some Regions employed extensive project selection processes, such as scoring proposals based on a set of pre-identified competitive ranking criteria. In some Regions, individual projects were also funded through an external competition, and in many cases these projects also received funds from other Agency sources. (See Appendix 3, Regional Project Selection Processes: Supporting Documents).
- Five **funding vehicles** were used to support RGI projects: grants, contracts, cooperative agreements, inter-agency agreements (IAGs), and procurement requests (Section 3.5). Grants (80 percent of which were competitive) and contracts were the most common.
- Analysis of the **distribution of RGI funds by amount per project** showed that the average project budget (at least from the RGI funds) was \$34,400 and the median was \$21,600 (Section 3.6). These amounts do not account for the contribution of other internal and external sources of funding for the same projects.
- The most common **general project topic areas** were water and air, followed by pollutants, toxics and contaminants, public and children's health, waste and recycling, agriculture, and energy. (Section 3.7).

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<sup>9</sup> Overarching Questions 1-4: (1) How do RGI projects align with the RGI criteria and mission and reflect regional and national goals and priorities? (2) What is the process for selecting and funding RGI projects? (3) How are RGI outcomes and results identified and measured? (4) How are RGI outcomes and results communicated to different audiences and how could communication be improved?

- In terms of **geographic area and scale** of RGI projects, the largest percentage (33 percent) was focused at the city, town, or local municipality level (Section 3.8). State-level and Region-wide projects were also common (19 percent each), followed by projects that focused on particular watersheds (10 percent) and county-level projects (7 percent).
- Regarding the **timing of RGI funding obligations**, Regions were allowed the flexibility to disburse RGI funds over a two-year period (Section 3.9). Evaluation participants had differing views about whether this flexibility had overall positive or negative effects. Most Regions were trying to speed up funding obligations so that they would not extend into the second funding year.
- **RGI audiences** include EPA’s senior leadership at Headquarters and the ten Regions, RGI-funding recipients and partners, government public affairs personnel, Congress, the White House, NGOs and interested members of the public (Section 3.10). Despite the use of multiple methods of communication about RGI and RGI projects, **communication with these audiences was insufficient to convey RGI’s role or accomplishments, or to address concerns about how RGI funds were spent**. Several suggestions for improving communication are offered.

## 3.2 Alignment of RGI Funding Decisions with National RGI Mission and Criteria

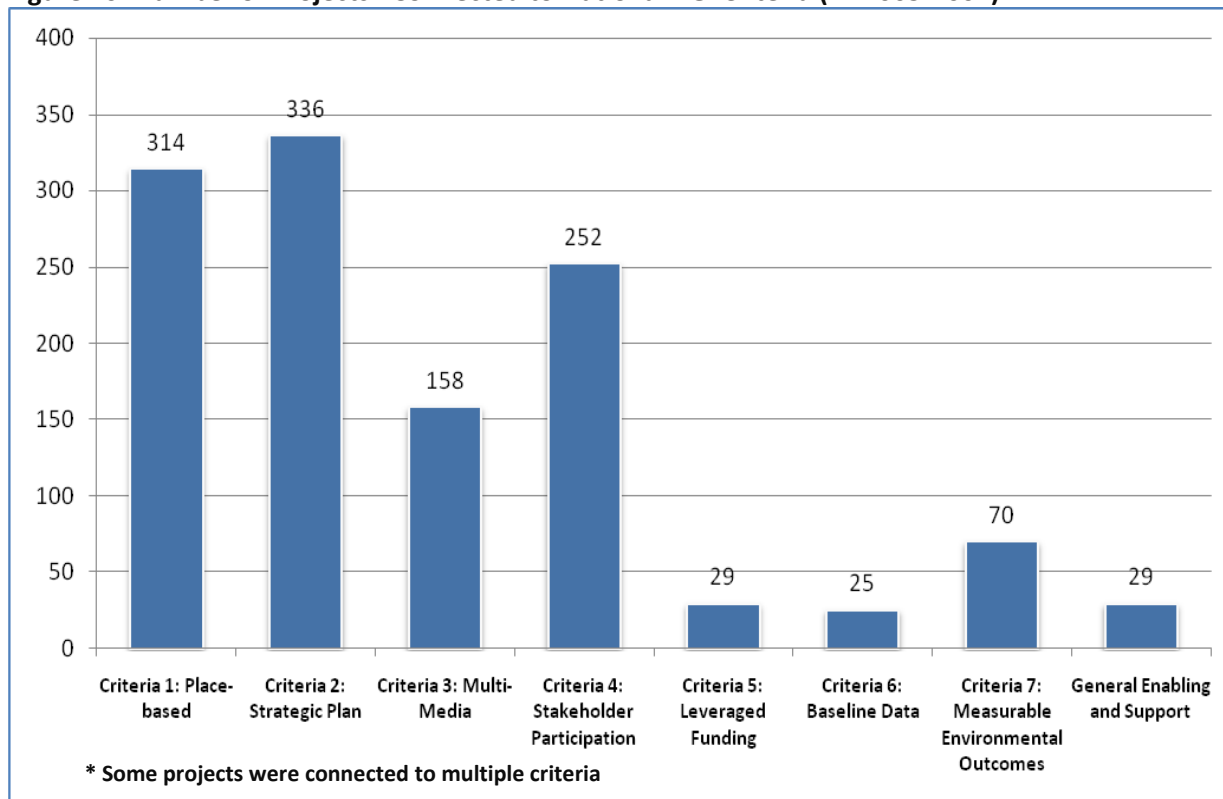
Interviews and other information sources used for this evaluation show that **all Regions used the RGI national mission and criteria** (Figure 2) **to guide decision making for RGI funds and that most projects met at least three of the seven criteria** (Figure 10 and Table 1). The most common criteria cited that applied to RGI-funded projects were supporting place-based needs, supporting the Agency’s Strategic Plans and other strategic priorities, collaborating with other stakeholders, and addressing multi-media challenges. The more complicated criteria on leveraging other funds and establishing baseline data and measurable results were less frequently represented. Opportunities for achieving greater representation across all criteria exist though some would require greater investments by the Agency (e.g., development of a set of consistent performance measures and reporting guidelines that are in balance with funding levels).

Twenty-nine of 453 projects analyzed did not have an identifiable connection to RGI criteria, and are therefore identified by the category “General Enabling and Support.” This does not mean that no connection exists. There were two primary reasons that the evaluation team identified as causing a lack of clarity in a project’s connection to the RGI criteria. First, there was not enough information available in the database to determine the connection. As the evaluation progressed the evaluation team received updated lists of projects that were not entered into the database at the time the information was downloaded for analysis. However, in several cases the team only received the project names, funding years, and amount of project funding and therefore did not have the full set of information to determine a link to the RGI criteria. Second, the database field intended to describe the connection to RGI criteria was populated with vague descriptors, and other information about the project in the database was not sufficient to clarify the project’s link to RGI criteria.

Evaluators found that **RGI Coordinators were the only group of interviewees who were consistently familiar with the national RGI mission and criteria**. Other interviewees on the whole had either a vague familiarity or no awareness of them. It was unclear to many Headquarters participants and some regional participants how Regions applied the criteria when selecting projects. The vast majority of interviewees, including most of the RAs and DRAs, were not familiar with the specific RGI national

criteria at the time of the interview. Given that these same individuals were, in most Regions, responsible for making final project selections, the question of whether and how the criteria were used appears valid.

**Figure 10. Number of Projects\* Connected to National RGI Criteria (FY 2005-2007)**



**Table 1. Percent of RGI Projects that Met One or More National RGI Criteria (FY 2005-2007)**

% of projects that met all seven criteria	0
% of projects that met six criteria	1%
% of projects that met five criteria	7%
% of projects that met four criteria	24%
% of projects that met three criteria	24%
% of projects that met two criteria	16%
% of projects that met one criteria	21%
% of projects with no clear connection	8%

On the other hand, evaluators found that the **processes used by most Regions at the staff level to solicit, screen, and recommend projects to senior leadership** (typically the RA or DRA) **did explicitly include the criteria**. Given the screening that took place prior to senior leadership decision making and the fact that the senior regional leaders understood how the funds were intended to be used in general, it may or may not “matter” that the senior decision makers were not aware of how the criteria were used for selecting projects.

**Example Project: Passaic Watershed Outreach Cooperative Agreement  
FY 2007, Region 2, \$60,000**

During the dredging and cleanup of the Passaic River in the City of Newark, Region 2 identified communications gaps for community health and environmental justice that were not covered by cleanup funding. The project developed three brochures which were then disseminated at public meetings and provided to local governments. The brochures were also used to supplement outreach efforts by the States of New Jersey and New York and stakeholder groups.

The project helped to address significant environmental justice issues in the communities along the lower Passaic River, including a significant homeless population that relies on fish for sustenance and numerous immigrant, low-income and minority communities that fish and crab in the Passaic River and Newark Bay.

*Participant Suggestions Regarding the RGI Mission and Criteria*

Interviewees made the following comments and suggestions regarding the mission and criteria:

- Leave the criteria as they are – they are fine as is.
- The criteria are very broad. Some saw this as an asset, allowing for a variety of flexibility for justifiable applications; whereas others saw this as allowing just about any kind of project and therefore providing too much flexibility at the cost of identifying clear results that are tied to specific Agency goals and priorities. To address this, participants suggested making the criteria more precise, but not so narrow or prescriptive that they cannot be tailored to each Region’s needs.
- Consolidate the criteria about results and outcomes.
- Eliminate redundancy between the mission statement and the third criterion.
- Add more specificity on the criteria about supporting the Agency’s Strategic Plan and supporting identified regional priorities.
- Add more specific criteria that address the following issues:
  - reproducibility in other areas;
  - emergency, just-in-time (e.g., response to tips), and emerging needs;
  - estimation of the feasibility of the project being funded within one year; and
  - prioritization of larger projects and/or multi-year projects (to support the realization of identifiable results).

*“The mission of filling these gaps which we cannot otherwise fill is a good one; that’s typically what [RGI funds have] been used for. Or it’s often been the other way around: when I’ve seen something that’s really neat, I’ve found out that the funding came through RGI. I think most Regions used these moneys in ways that other money could not be used, and if you start to use criteria [that are too strict] you’ll lose the flexibility that you want and the results.” – Deputy Administrator*

- Clarify the difference between criteria and expectations or guidelines about project selection, reporting, and results.
- Several participants said that RGI’s challenges were less about the RGI criteria and more about how RGI funds were used, particularly how they were used to support the Agency’s priorities and what the results of those expenditures were relative to those priorities.

### 3.3 “Discretionary” Funding Issues

A major issue identified by evaluation participants was the **perceived or actual “discretionary” use of RGI funds**. Some participants emphasized that the degree of discretion and flexibility that Regions had with regard to use of RGI funds was both reasonable and vital to addressing specific geographic and community-focused environmental and public health needs. These participants emphasized that such specific needs often fell in gaps in other conventional or more prescriptive funding mechanisms. Other feedback was more critical in nature, emphasizing that discretion in the use of funds created significant vulnerabilities for RGI, leading to a perception that RGI expenditures lacked transparency and accountability and that they were not always used as intended by Congress. (Note: No examples of policy or rule violations or other misuse of RGI funds were identified by participants or evaluators.) This section explores several factors that have contributed to concerns about discretion and the use of RGI funds and identifies considerations for addressing these factors in the design of any future regional “flexible” funding source.

*“Too much discretion was exercised with this program. The two-tiered approach [EPP and RGI] provided more flexibility than Congress intends for us now to provide.”*  
 – Headquarters Participant

Confusion and concern about the degree of discretion in the use of RGI funds has been fueled in large part by the flexibility of each Region to use up to 35 percent of its RGI funds to support management priorities outside of the scope of the national RGI criteria. This portion of RGI funds was commonly referred to as Environmental Priorities Projects or EPP. (EPP is discussed in more detail below.) To resolve questions about RGI decision making, evaluators explored how Regions made RGI funding decisions and whether these decisions were different for any discretionary or EPP portion of the RGI funds. Results (described in detail throughout Chapter 3) show that seven of the ten Regions made no distinction between RGI and EPP funds, and thus in these Regions, projects were selected from one pool of “RGI” funds. At least five of the Regions used external RFPs to solicit proposals for funding, and the remaining had either formal or informal RFPs that were internal to their Regions. Some Regions used a fairly rigorous and objective project ranking system to select projects based on pre-identified regional and national priorities, whereas others relied more on informal screening and senior management decision making. There was no clear correlation between project selection processes and the resulting project topic areas.

Many evaluation participants indicated that the perceived discretion associated with the use of RGI funds, coupled with shortcomings related to the communication or at least understanding of RGI processes and results, has severely undermined support for RGI. Many participants also noted, however, that it is possible to design a regional funding source that has a reasonable degree of discretion and flexibility and that also is transparent and accountable.

## RGI and EPP: A Source of Confusion

Interviews revealed that confusion and concern about the degree of discretion in the use of RGI funds has been fueled in large part by the how RGI funds were allocated in the Regions. First, once salaries were covered for both Headquarters and Regions, RGI funds were distributed evenly to each of the ten Regions. Each Region then had the flexibility to use up to 35 percent of their RGI funds to support management priorities outside of the scope of the national RGI criteria.

This 35 percent was commonly referred to as Environmental Priorities Projects or EPP. EPA Regions had the flexibility to choose whether to apply the national RGI criteria to the EPP portion of the funds. Some Regions did not differentiate between RGI and EPP funds or related decisions; other Regions had two separate processes for RGI and EPP funds, which were sometimes entirely managed through two separate offices and processes. In addition, some Regions changed their approach to separating and using RGI and EPP funds over time. In short, each Region independently determined whether and how to distinguish between these funds as this was part of the flexibility afforded by the RGI funding source.

**Example Project:  
Geographic Information System Support  
FY 2005 - 2007, Region 7, \$72,000**

GIS support plays a critical role in environmental protection in Region 7. GIS tools present complex data in a visual format which helps identify environmental needs. The Region's GIS was used to develop a number of applications at the direction of the Strategic Priority Theme leaders. For example, Critical Ecosystems support provided for a multi-year effort that developed a GIS model identifying critical ecosystems throughout the Region. For the Sensitive Populations team, GIS resources were used to develop a number of maps and applications including an Environmental Justice mapping tool which provide demographic and facility data together with other risk indicators, allowing staff to help target areas with sensitive populations.

It is important to note that the discretion that could have been exercised in project selection and use of funds was not exercised by all Regions, at least not for the past 3-5 years of RGI funding. During this time frame, senior leaders in most Regions minimized or, in a few cases, eliminated discretionary decision-making that they could have exercised with RGI funds according to the interview results and other information analyzed by the evaluators. Some Regions opted to apply the national RGI criteria to all funds, including the 35 percent that could have been allocated to support other regional priorities (including general regional support) under EPP. In addition, some Regions ensured that all or nearly all projects funded with RGI resources were selected from an external competition and objective project selection process. Given that several interviewees (particularly in Headquarters) described how they thought the Regions were, in general, "doing whatever they want" with RGI funds, it appears as if there was a low level of awareness of these relatively objective and transparent project selection practices in those Regions where they were practiced.

Moreover, the evaluators found that many of the perceptions and misperceptions around RGI centered on confusion or lack of awareness related to the EPP portion of the funds and what expenditures were or were not “allowed” under the EPP portion of RGI. For instance, many participants were not aware that the national criteria were not required to apply to the EPP portion of the funds. Those who were aware of this knew, therefore, that it was appropriate to spend part or all of the EPP portion on regional needs that the regional senior leadership (typically the RA or DRA) deemed to be important. Legitimate uses for the EPP portion included supporting priority geographically based environmental needs, and “general regional support,” such as purchasing equipment, sponsoring recognition events, paying for staff training, or investing in other priority areas that the RA believed was important and was not otherwise being funded. Only a few interviewees (primarily from the Office of the Administrator who were more familiar with RGI), however, were aware of this distinction between EPP and other RGI funding and the additional discretion given to Regions with regard to the use of EPP funds. In addition, several regional interviewees described that the distinction between RGI and EPP projects had become blurred, and how it was not clear to them whether the national RGI criteria applied to both sets of funds or not.

*“Sometimes [our Region] had to use the money to do things like pay salaries. This came as a higher priority approach than for grants for extramural. There will be decisions made, for example, whether we can fully fund the FTEs allocated to the Regions because there's not enough money to pay salaries, telephones, offices, etc. That's the kind of choice that's made.” – Deputy Regional Administrator*

Despite the EPP provisions for discretionary use of funds for general regional support, a few participants expressed a clear opinion that federal appropriators did not intend for the funds to be spent with as much discretion as they were (or believed they were). These issues are explored more in the following pages, though it is important to reiterate that no examples of policy violations, rule breaking, or other misuse of funds were provided by participants or identified by the evaluators at any point during the evaluation. Several participants did point out, however, that between the broad criteria and discretionary allowance for funding decisions, it would be hard to fund projects that were not in some way defensible.

### **Analysis of “EPP” expenditures based on Information in the RGI Database**

The designation of “EPP” did not necessarily mean that projects clearly differed in substance, process, or results than “RGI” projects, with the exception of expenditures that went clearly toward general support purposes as discussed above. Table 2 illustrates that a label of “EPP” or “RGI” is not necessarily an accurate indicator of whether or not a project responds to the national RGI criteria or is otherwise substantively different than other “RGI” projects.



**Table 2. Examples of Projects Categorized in the RGI Database as either RGI or EPP (FY 2005-2007)**  
**(To illustrate that the EPP/RGI distinction did not necessarily make a substantive difference in the work done)**

Region	Type	Project Name	Description
The following two projects are similar, even though one is categorized as RGI and one as EPP			
R7	RGI	Yellow River Watershed	Assess the mainstream and tributaries for active gullies and prioritize for grade stabilization structures/sediment basins based on severity and impact of fishery.
R6	EPP	Dissolved Oxygen Monitoring	Sampling study to collect appropriate data to establish a basis for refinement of existing aquatic life use categories and water quality criteria.
The following two projects are similar, even though one is categorized as RGI and one as EPP			
R10	RGI	Port of Seattle Diesel Emissions Reduction	To reduce air pollution from Port of Seattle seaport operations through the use of emission reduction controls and education/outreach.
R2	EPP	Sustainable Ports and Carriers Partnership	The Sustainable Ports and Carriers Partnership is designed to address environmental issues associated with ports, ocean-going vessels, and intermodal carriers.
The following two projects are similar, even though one is categorized as RGI and one as EPP			
R1	RGI	Youth in the Environment	This project targets inner-city and rural youth, to encourage high school student to consider careers in the environmental field. The nation's water infrastructure profession is losing many capable and well trained operators and personnel to retirement.
R2	EPP	Turn on Youth to Careers in Environmental Protection	This project will provide 15 - 20 students with summer employment at three sites (Wards Island and North River Wastewater treatment plants and the NYC Bureau of Customer Services) within NYC
The following two projects are similar, even though one is categorized as RGI and one as EPP			
R9	RGI	Environmental Justice Workshops	Workshops to help communities fight pollution, access information on environmental risks in the community, etc.
R1	EPP	Environmental Justice - Awareness Training	Environmental Justice awareness training to EPA staff on the legal and policy framework of EJ and to provide them with Region-specific case studies illustrating real world issues and accomplishment

The following list of example projects from Region 10 further underscores that assumptions about “RGI” projects clearly supporting regional geographic and other environmental priorities and “EPP” supporting only general support work are not necessarily accurate. In Region 10, decision making processes for allocating RGI and EPP funds were entirely separate. “RGI” projects were competed externally and decided upon by a committee that worked independently from the Regional Administrator’s office. EPP projects were selected by the Regional Administrator’s office according to a needs assessment done internally by regional senior leadership. The following EPP projects covered both regional support work

**Example Project: West Coast Collaborative  
Multiple funding years and amounts  
Regions 9 & 10**

Regions 9 and 10 implemented several RGI projects under the West Coast Collaborative that resulted in diesel emissions reductions. For example, in Alaska, a \$65,000 project designed, constructed, and demonstrated the economic viability of a self-contained “portable” fish waste processing facility to extract fish oil suitable for use as boiler fuel, supplementary engine fuel, and as feedstock for the production of biodiesel.

Estimated project results included over 50 tons per year reduction of criteria pollutant discharges and a net production of 84,000 gallons per year of fish oil (equivalent to 76,000 gallons per year of petroleum diesel), with additional benefits through the displacement of fuel transport emissions, reduced or mitigated fuel spill impacts, and improved water quality.

(e.g., feedback training and the Senior Environmental Employee Assistance program) and general support for high-priority environmental projects that have been considered to be successful and replicable by other parts of the Agency.

Examples of EPP Projects in Region 10:

- Water infrastructure & climate change
- Waste water management analysis (Mason County)
- Puget Sound/Georgia Basin environmental indicators report
- Lean Manufacturing Initiative
- Pollution trading screening analysis
- Issuance of Region 10 priorities report
- 360 degree feedback for supervisors
- Negotiation skills training
- Working capital fund regional support
- Senior Environmental Employee Assistance
- West Coast Collaborative (diesel emissions reduction collaboration)

It is important to note that, for some Regions (or some years in some Regions), the evaluators have a low degree of confidence in the distinctions made between “RGI” and “EPP” project labels in the database. It appears as if the designation did not occur consistently in some instances. For example, in one Region, all projects were designated RGI in one year and EPP in the next year, even though all projects in that Region went to the same (multi-year) program to fund environmental projects in the Region’s geographic priority areas. Apparent inconsistencies in the database coding of projects as RGI or EPP seems to reinforce the evaluators finding that there has been significant confusion around the EPP component of RGI funding. The apparent database inconsistencies do not change, however, the overall findings around the lack of clear differentiation between “RGI” and “EPP” project topics or that general regional support expenditures represented a small percentage of all RGI expenditures.

**Table 3. Summary of General Regional Support Projects (FY 2005-2007)**

Type of Support	Amount Funded	% of General Support Funding
Communication and outreach (e.g., regional priority reports, communicating priorities via the Web, public information access improvements)	\$554,104	25%
Records management	\$301,382	14%
Senior Environmental Employee Assistance* (one Region)	\$230,300	11%
Geographic Information Systems (technology, mapping, etc.)	\$224,372	10%
Leadership training, strategic planning, and related leadership capacity building	\$162,327	7%
Intern programs	\$161,702	7%
Technology upgrades (e.g., audiovisual equipment)	\$152,610	7%
RGI Coordinator travel and other travel prep/assistance for regional employees	\$88,368	4%
Sustainable building master plan (in one Region only)	\$80,000	4%
Use of helicopter for coastal monitoring program (in one Region only)	\$50,000	2%
Improving information proficiency of regional employees	\$29,000	1%
Human resource position classification	\$23,595	1%
Statistical support to support science council	\$14,830	1%
Recognition events (e.g., post natural disasters)	\$7,731	0%
Other**	\$102,019	5%
<b>Total General Support Funding</b>	<b>\$2,182,340</b>	<b>100%</b>
<b>Total Funding (RGI-Wide, FY 2005-2007)</b>	<b>\$16,159,816</b>	<b>13.5%</b>

\* The Senior Environmental Employment (SEE) Program provides an opportunity for retired and unemployed older Americans to share their expertise with EPA. To implement this program, EPA and other Federal and State environmental offices fund cooperative agreements with national aging organizations. SEE workers are not federal employees, nor are they employees of the grantee organization. They are SEE Program enrollees/participants. For more information, see: <http://www.epa.gov/ohr/see/brochure/index.htm>

\*\* Other projects were all \$10,000 or less and are listed with the other projects in Appendix 7

Given the level of scrutiny RGI received with regard to spending on general regional support, evaluators assessed the use of RGI funds by Regions to see if any additional clarity on this issue could be achieved. Evaluators reviewed information on all 453 projects analyzed for this evaluation to estimate how many projects could be *reasonably* considered to fall in a “general regional support” category. The resulting list of “general support” projects is provided in Appendix 7 and is summarized in Table 3, below. Based on this analysis, approximately 13 percent of the projects (61 projects when multi-year projects are counted only once) and \$2.2 million (13.5 percent) of all RGI project dollars between FY 2005 and FY 2007 could fit in this category. Evaluators emphasize that these estimates may be high, because at least a few of the projects included in this informal administrative/general regional support category could be

listed as supporting national RGI mission and criteria instead of “general regional support.” Examples of such projects are development of a RCRA data management system and summer internship programs.

Table 3 groups and summarizes the types of expenditures that fall in this informal “general support” category. Regional communications, such as the development of regional priority communications and increased public education and outreach efforts, were the most common use of these funds, representing 25 percent of the total. Most Regions had some expenditures of this nature. The rest of the expenditures were less common across the Regions, though records management, information technology/GIS investments, leadership capacity building and strategic planning, and travel were expenditures found in at least a few Regions. Instances where expenditures in one “category” occurred only in one Region are noted in the table.

### *Participants Suggestions Regarding Discretionary Funding Decisions and EPP*

- Nearly all participants recommended eliminating EPP altogether or at least formally separating EPP and the rest of RGI. The primary benefits (reasonable flexibility, focus on place-based and community work, etc.) could be realized through the RGI portion of the funds.
- Regions consistently emphasized that flexibility in regional decision making should be maintained. As some noted, Regions can (and some did) have clear project selection criteria, transparent decision making, etc. and still maintain a reasonable level of discretion at the Regional Administrators level first by identifying regional priorities to base selection criteria on, and second by helping to make final project selection after initial screening, scoring, etc.
- Several interviewees discussed how, if Regions critically need additional general support funding (which several Regions said they do need), funds for this purpose should come from another source that is solely dedicated to that purpose. A few participants suggested reinstating the ZZZME8 (an EPA funding code for general support dollars) fund if EPP will not continue.
- Identify what *cannot* be done with the funds rather than direct what the funds should be spent on.

*“I think the days of having large discretionary pots of money are long gone; and are behind us. I don’t think that we are going to have any discretionary money. When I hear people talking about RGI, I hear about a specific environmental problem that was common to some or all Regions. There’s always opportunity through the planning or budget process for those issues to be flagged. I see that continuing.” – Headquarters Participant, Office of the Chief Financial Officer*

## **3.4 Regions’ Project Selection Processes**

Evaluators asked selected participants (namely the RGI Coordinators and other who were most familiar with each Region’s decision process) which process they used to make RGI funding decisions and whether these decisions were different for the EPP portion of RGI funds (results in Figure 11). The information gathered in response to this question and as part of the evaluation’s data gathering efforts represents the first time when RGI decision making has been summarized concisely at the national level,

albeit broken down Region by Region as each Region had its own process. “Unveiling” the project selection processes in this report may help to clarify questions about RGI, especially given that many evaluation participants, particularly at Headquarters, were not aware of how projects were selected and this lack of understanding alone may have exacerbated the perception that RGI funds were spent “willy nilly.”

A high-level summary of the processes used by each Region is provided below, and additional information, including copies of many Regions’ competitive grant RFPs, is included in Appendix 3. To summarize the processes briefly, seven of the ten Regions made no distinction between RGI and EPP funds, and thus in these Regions projects were selected from one pool of “RGI” funds. In other words, there was no EPP distinction in the decision making process in these Regions. The other three Regions had a different process for selecting “RGI” and “EPP” work.

At least five of the Regions used external RFPs to solicit an external competition for their RGI funds. In some Regions these external competitions were used for all of the funds and in some Regions it was for all but the EPP portion of the funds (see Region-by-Region specifics in Figure 11.) As detailed in Appendix 3, some Regions employed extensive project selection processes that involved project screening and ranking according to pre-defined criteria such as connectivity to the national RGI criteria and regional priorities, linkages to the EPA Strategic Plan, anticipated results, likelihood of continuing over time, etc.

In most Regions, the RA or a team of senior regional leaders made final project selection, but other models for RGI project selection included project selection based only on the number points proposals were assigned (Region 8 RGI projects) and a team of managers from an office that is totally separated from the RA’s office making the selections (Region 10).

**Figure 11. Summary of Regional RGI and EPP Project Selection Processes**

Process of RGI Project Selection	Process for EPP Selection
(Note: If the two columns are combined, there was no separate pool of funds or project selection distinction between RGI and EPP)	
<b>REGION 1</b>	
RGI and EPP: EPA - New England prioritizes competition for all RGI and EPP funds. An internal RFP is issued open to all R1 programs. The RA’s office makes final project selections based on the proposals received and factors including linkage to Region 1 Strategic Plan and regional priorities. A significant portion of Region 1’s RGI funds is allocated to the Healthy Communities Program, which involves a second competitive process open to external stakeholders. The second competition combines RGI and EPP funds with other programmatic discretionary funding to competitively award projects that: benefit communities at risk; assess, understand and reduce environmental health risks; increase collaboration through community-based projects; build institutional and community capacity to understand and solve environmental and human health problems; and achieve measurable environmental and human health benefits. Program leads from all contributing programs make final selections based on the evaluation criteria in the application guidance.	

**Figure 11, continued**

<b>REGION 2</b>	
RGI: Internal RFP. The RGI Coordinator screened RGI proposals and made recommendations to the RA and/or DRA who made final decisions. National criteria and regional priorities were basis for project selection.	EPP: Internal RFP. Project proposals were reviewed by the Division Directors and then the Division Directors and DRA met to review and make recommendations to the RA. RA made final decision.
<b>REGION 3</b>	
For both RGI and EPP: In past years used RFPs. More recently used the national criteria in light of regional priorities and possible multi-media and geographic-based projects. The senior management (RA, DRA, ARA, and DARA) made final selection decisions.	
<b>REGION 4</b>	
RGI and EPP: An RFP for nearly all projects. Projects were selected based on regional criteria which incorporated the national criteria, such as equity (of funding) among the states, environmental priorities, “rate of return” from the funds, “exportability” to other areas, ability to define outcomes, etc. For each identified regional priority (e.g., sustainable agricultural; children’s health protection; reduced exposures to PM2.5 and air toxics), the proposed projects were reviewed and scored/ranked by a screening panel consisting of the RGI Coordinator and program representatives who made recommendations after reviewing and scoring/ranking the proposals to the Regional Administrator, who made the final selection.	
<b>REGION 5</b>	
RGI and EPP: For four of the past five fiscal years, nearly all funding was allocated through an RFP process for the Great Cities Initiative, which focused on environmental priority projects in a selected group of cities (one in each Region 5 state) each year. (An exemption from the grants competition requirement was granted for this program). In the last year of funding, funds went to other environmental priorities, such as homeland security. The use of EPP funds as a separate entity only occurred under the most dire of circumstances and only on a very few occasions: There was a very clear understanding that RGI monies were to be used for the Great Cities program and other priority environmental projects.	
<b>REGION 6</b>	
RGI and EPP: An RFP solicited proposals. The DRA would review proposals and make selections based on the RGI criteria and consistency with the Region’s Strategic Plan/300-day plan.	
<b>REGION 7</b>	
RGI and EPP: In past years Region VII used an RFP. More recently the Region used regional priorities and the national criteria to select projects. Each year the RA’s office sets regional priorities. Based upon these priorities, senior managers within the Region would submit RGI project proposals to the RA and DRA. After projects were identified, the RGI Coordinator would gather project details and provide summary information to the RA’s office. The RA would make the final project selection based on these considerations and the Agency’s mission.	

**Figure 11, continued**

<b>REGION 8</b>	
<p>RGI: A competitive RFP process was used. Projects were ranked and the projects with the most points were selected. National criteria were considered and regional “strengthening factors” were used to break ties between applications with equivalent scores. Strengthening factors included results within a two-year time frame; demonstration that the proposal is an unfunded part of a related, ongoing project with documented performance and progress; linkages to Strategic Plan Goal 4, etc.</p>	<p>EPP: An internal competition was used focused on Region 8 priorities (e.g., tribal programs, agriculture); appropriate use of EPM funds (i.e., not for travel or to augment other appropriations); “doability”; identified spending vehicles accomplish project funding and be obligated by year-end; new regional initiatives that are unfunded or underfunded, or emergency or unanticipated situations; short term nature (cannot be used to continuously fund on-going projects); alternative funding availability; and, ability to leverage other funding sources. Final decisions were made by the RA and DRA.</p>
<b>REGION 9</b>	
<p>RGI and EPP: Project selection was based on regional priorities identified by the RA and DRA based on the Region 9 Strategic Plan, Division Operating Plans, and priorities identified through ongoing collaboration and discussion with states. Based on the RA/DRA’s guidance, regional divisions identified possible projects as part of Division Operating Plans. The Region aligned RGI/EPP funding to support a mix of these priorities for each fiscal year. The RA and DRA made the final decisions. Once final decisions on priority areas for funding were identified by Region 9’s RA and DRA, the appropriate funding mechanism, including competitive RFPs for RGI priority areas, was used to award RGI funds.</p>	
<b>REGION 10</b>	
<p>RGI: A competitive RFP process was used. For FY 2007, proposals were to focus on integrated, collaborative, or community-based approaches to reduce greenhouse gas emissions or prevent pollution by promoting the availability of renewable energy; promoting the efficient use of existing energy sources; or sequestering carbon. Proposals were to demonstrate at least one of the following approaches: developing strategic partnerships; working collaboratively and cooperatively with a range of stakeholders; building local capacity to solve environmental problems; promoting stewardship and individual responsibility; adopting integrated, comprehensive approaches to environmental management; helping local agencies and community groups to use data, information, and tools in environmental assessment, planning and problem solving; and/or incorporating traditional ecological knowledge. Final decisions made by a team within the Office of Ecosystems, Tribal, and Public Affairs.</p>	<p>EPP: The RA and DRA made final selections based on the Region’s annual priorities and a needs assessment developed for each fiscal year’s operating plan.</p>

During the interviews, the regional senior leaders shared their perspectives about RGI project selection. The evaluators observed that in all Regions, regardless of the process employed, the senior leaders showed a strong sense of ownership and responsibility over the use of RGI funds including how and which projects were selected.

Regional participants did share a spectrum of opinions about what process for deciding how to use RGI funds was the best, however. The most common topic that revealed a divergence of opinions was whether a competitive or non-competitive process would be best.

Some regional leaders discussed how they thought that an externally competed process was preferable because it made the process

more transparent and less subject to scrutiny. Some thought that externally competed processes also resulted in projects with clearer results that would be more clearly tied to Agency's priorities (particularly when this objective was made explicit as a project funding criterion). Other regional leaders thought that external competition was excessively burdensome, and that as long as the competitive grants rules were being followed, other competitive requirements should not apply to RGI funds as this was the only source of flexible regional funding. Further, some noted, many RGI projects are small (often purposefully so) and competing the process would involve an inordinate amount of time and energy. Headquarters interviewees largely favored a competitive process, but when asked about whether that would suit small-scale projects (e.g., \$5,000 or less) many said that competition would be too cumbersome. No one suggested that the competitive grant policy should not be followed.

The funding mechanisms (grants, contract, etc.) used for RGI work between FY 2005 and FY 2007, including the extent to which grants were competitive and not, are explored in the following section, Distribution of Funds by Funding Vehicle.

Participants also discussed whether project selection should be based on pre-identified priorities or topic areas, the extent to which the RAs and DRAs should have "leeway" in making final decisions, and whether all Regions should follow the same general project selection process to enhance consistency and transparency. Opinions on these topics ranged substantially, though on the whole regional participants clearly prioritized maintaining flexibility in decision making, even if additional processes and procedures needed to be followed by all Regions. Several interviewees from both the Regions and Headquarters said that, regardless of what might be best for the Regions, even in light of the argument that flexibility in decision making is direly needed, it is political reality that funding decisions tied to pre-identified Agency priorities and externally competed engender more confidence around transparency and accountability. For this reason, some explained, any regional funding of this nature should in the

**Example Project: Anacostia River Restoration  
FY 2006-2007, Region 3, \$200,000**

Project funding was used to ensure cooperation and coordination of stakeholders as well as to establish priorities for restoration activities throughout the Anacostia River watershed. Funding was initially allocated to demonstrate the Region's commitment to restoring the Anacostia River watershed by: 1) developing a draft watershed plan using community-based approaches aimed at preventing, reducing, or eliminating water pollution for the Anacostia River watershed; 2) creating a 'Building Blocks' document designed to both educate the public and help accelerate the restoration effort; and 3) hiring an Executive Director to assist in shaping and focusing the restoration process.



future strive to, or may be required to, adhere to these and other more consistent, rigorous, and transparent project selection approaches.

**Example Project: Beyond Translation – Engaging Spanish-Speaking Communities**  
**FY 2006, Region 6, \$10,000**

On October 17-18, 2006, EPA Region 6 hosted the “Beyond Translation Forum” in San Antonio, Texas, where more than 100 Hispanic community leaders and representatives of nonprofit, grass-roots and civic organizations, leaders in business and academia, the media, and local, state and federal government officials came together to discuss environmental challenges and opportunities, explore ideas for improving the Agency's service to Hispanics, and to enhance partnerships and networks. The discussions focused on the areas of community partnerships, public health and the environment, economic opportunities at EPA, and the education pipeline for environmental careers. As a result of the forum, EPA has partnered with community leaders and sister organizations to form five workgroups to address the priorities that emerged from the discussions.

### *Improving RGI Project Selection*

Participants provided several suggestions for improving RGI project selection and funding decisions. Some of these suggestions are already being implemented by some Regions for certain or all projects. Two factors are worth consideration when reflecting upon these suggestions. Before listing some of the suggestions, however, it is worth noting that several participants thought that the challenge was much less with project selection itself than with communicating more clearly (a) how projects are selected, (b) what results are being achieved, and (c) how the results contribute to regional and national priorities. Second, many interviewees expressed concern that more procedural and reporting requirements would make pursuing this kind of funding less desirable. They said that RGI already required substantial reporting requirements, particularly relative to the amount of funding that the Regions received for RGI. With those caveats in mind, suggestions for improving project selection included the following:

- Provide guidance on project selection, and differentiate project selection from the national criteria. In so doing, make the project selection process more consistent across EPA Regions (while, as already discussed, maintaining as much flexibility as possible).

*“My own impression is that [RGI project selection processes] have been highly variable... There are some Regions where there seems to be a clearly managed process for how the funds are allotted and tracked, whereas there are other regions where that seems to be blank.... I'm very leery; however, to start to nail down a process or draw a line around this. Instead we should clarify what we're going to hold you accountable to. As long as you're on schedule and deliver the outcomes, we don't care. That seems to me that's what needed. These need a clear outcome and a date by which they will be achieved.”*

*– Deputy Administrator*

- Encourage or require the development of logic models for projects funded with RGI resources over a certain dollar threshold. (Note: Region 10 employed this practice for some years.)
- Make Regional Administrators personally accountable for project selection and fulfilling related annual commitments around selecting projects with the highest potential to achieve identified results.
- Follow the Region 1<sup>10</sup> example for grant funding by consolidating RGI and other multi-media grant funding sources, such as pollution prevention and community air toxics grants, into a larger, more strategic set of targeted funds to support regional priorities.
- Improve the transparency of the selection process, perhaps by documenting the process in a manner that enables regional personnel, EPA Headquarters, other regional Offices, and potential RGI funding recipients to access and understand how the selection process works.
- Identify a target or required portion of RGI funds that should be directed to identify, measure, and report on results achieved by RGI-funded projects. (See also suggestions for identifying and improving results.)

### 3.5 Distribution of Funds by Funding Vehicle (and Competitive-vs-Non-Competitive Grants)

Evaluators used the RGI database to determine the distribution of RGI funding vehicles used in the FY 2005 - FY 2007 time frame. This assessment was important because many participants highlighted that there were misconceptions of RGI being a grant program instead of a funding source that employed all funding vehicles, including grants, contracts, cooperative agreements, etc. Second, according to interviewees, RGI had developed a reputation as a *non-competitive* grant program.

All of the vehicles used to distribute RGI funds were allowed and used. Of the five funding vehicles used (grants, contracts, cooperative agreements, IAGs, and procurement requests), grants and contracts were the most common (Figure 12). About 20 percent of the grant projects (or 9 percent of the total number of RGI projects) were funded with non-competitive grants. Non-competitive grants comprised approximately 12 percent (\$16.2 million) of the total amount of RGI funding from FY 2005 - FY 2007. The non-competitive grants included those grant categories for which Agency-approved waivers from competition had been issued, including projects to support the Great Cities Initiative in Region 5, support for the Senior Employee Employment Program, standing Agency-wide exemptions for Clean Water Act Section 104(g) grants and other specific grant programs, and standing exemptions from competition for awards beneath the \$15,000 grant threshold.

*“You first have to demonstrate results and outcomes before you can start from scratch to get the confidence. When you compete projects you eliminate the perception that it's just the RA's favorites.”*

*– Headquarters Participant*

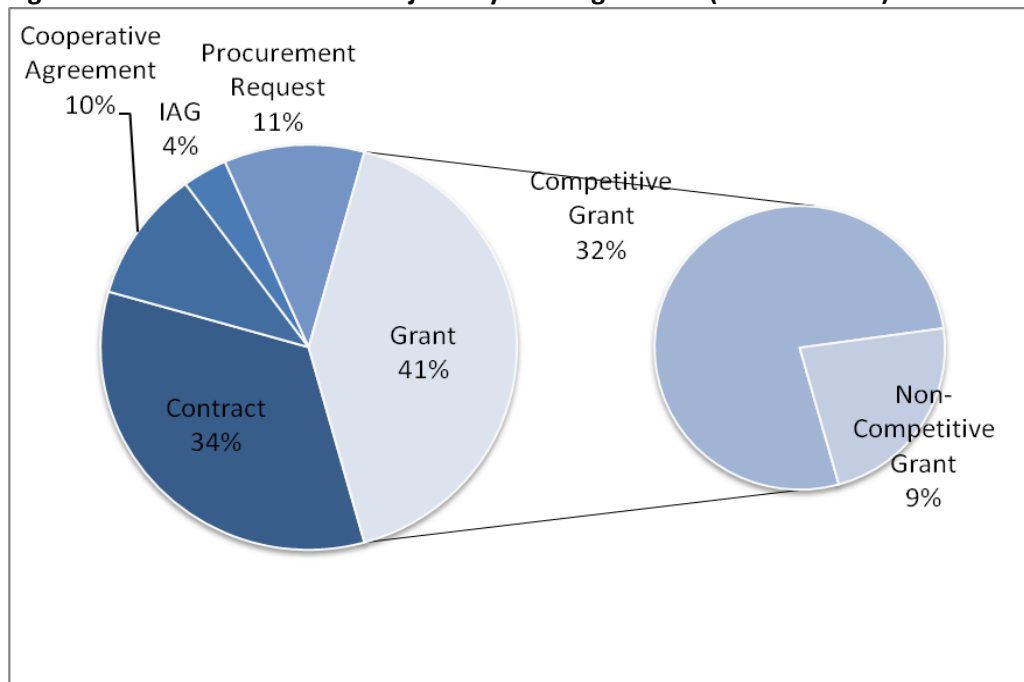
<sup>10</sup> See: <http://www.epa.gov/region01/grants/healthycommunities.html>

The results of the database analysis are described first to provide context for the subsequent discussion of interview results.

### Results of Database Analysis

According to the analysis of the RGI database, grants, contracts, cooperative agreements, inter-agency agreements (IAGs), and procurement requests were all used to distribute RGI funds (Figure 12 and Table 4). Grants and contracts were the most common, accounting for 41 percent and 34 percent of the RGI projects, respectively, followed by procurement requests (11 percent), cooperative agreements (10 percent), and IAGs (4 percent). A complete breakout of funding mechanisms by Region is provided in Appendix 5.

**Figure 12. Distribution of RGI Projects by Funding Vehicle (FY 2005-2007)**



**Table 4. Distribution of RGI Projects by Funding Vehicle**

Funding Mechanism	# of Projects	% of Projects Funded	Amount Funded	% of Total Amount Funded
Competitive Grant	155	32%	\$ 6,931,091	43%
Contract	164	34%	\$ 4,473,531	28%
Non-Competitive Grant	46	9%	\$ 1,884,075	12%
Cooperative Agreement	51	10%	\$ 1,461,174	9%
Inter-Agency Agreement	17	4%	\$ 745,557	5%
Procurement Request	53	11%	\$ 664,388	4%
<b>Total</b>	<b>486*</b>	<b>100%</b>	<b>\$ 16,159,816</b>	<b>100%</b>

\* The total number of projects is slightly higher than reported elsewhere because within the RGI database a small number of projects contained more than one entry in the "funding vehicle" data field (e.g., "Contract and Procurement Request"). Percentage figures were calculated by counting multiple funding mechanism entries individually and dividing the amount of project funding evenly among the number of funding mechanisms listed.

A vast majority of grants were awarded competitively (smaller pie chart in Figure 12). Specifically, of the 41 percent of RGI projects funded by grants, almost 80 percent were funded by competitive grants. About 20 percent of the grant projects (or 9 percent of the total number of RGI projects) were funded with non-competitive grants. Non-competitive grants comprised approximately 12 percent (\$16.2 million) of the total amount of RGI funding from FY 2005 - FY 2007.

Appendix 6 provides a full list of non-competed projects, with project year, amount funded, and reason for non-competitive status. The reasons cited for non-competitive awards are summarized as follows:

- Standing exemption for Clean Water Act Section 104(g) grants
- Standing exemption for Assistance Awards to States/Interstates/Local Agencies/Tribes/Intertribal Consortia
- Standing exemption for original awards under \$15,000
- Standing exemption for Public Interest grants
- Agency approved exemptions for the Region 5 Great Cities Program and the Senior Employee Employment Program
- Memorandums of Understanding (MOUs)
- Add-on to existing award

### *Participant Comments about Funding Vehicles*

All regional participants and most Headquarters participants considered it important to have a variety of funding vehicle options in order to match the right vehicles with the right purposes. For example, testing a new technology may have been best suited for a contract vehicle, whereas community involvement may have been best suited to a grant vehicle. Additional factors, they said, included technical and legal restrictions and “doability” (e.g., what funding mechanism will work to obligate funds within the first year). Several participants explained that the funding mechanism can influence project selection and timing, and vice versa. Many reiterated that RGI was a funding source, with all the flexibility in using a variety of vehicles that funding sources have, versus a grant program which would be by nature limited to grants.

A few interviewees from Headquarters suggested that any future regional funding of this nature be limited to competitive grants. Regional interviewees, by contrast, were nearly all averse to this idea, claiming that such a limitation would eliminate the flexibility that is the most valuable aspect of RGI. Further, some regional participants explained, there are reasons in some cases why non-competitive awards could achieve the objectives of RGI more effectively. A few Regions intentionally made small awards (e.g., \$20,000 or less) to provide support for more local needs and underserved communities (the “1,000 flowers bloom” idea) and this was only made possible due to RGI. In other cases, leveraging other funding sources from within or outside of EPA entailed making small grant awards (e.g., to provide EPA’s “share” for forming a new stakeholder consortium around a multi-jurisdictional challenge such as children’s asthma). Interviewees described how in these cases there was no intentional decision around competing the grants or not, and grants were not always the vehicles used in any case. (The vehicles matched their purpose and vice versa.)

Region 5’s Great Cities Initiative, which was the primary source of Region 5 RGI spending from FY 2004 through FY 2006 represents one instance where a Region’s RGI funds were supporting a handful of cities in Great Lakes states through non-competitive grants. Region 5 obtained an exemption from the Headquarters Office of Grants and Debarment to be able to direct RGI funds to one city in each of its

states for each round of funding. Proposals for projects within these cities were solicited, reviewed, and selected in a manner that was equivalent to a competitive process, but technically these grants were not competitive.

As previously mentioned, several regional interviewees also discussed how the competitive process takes a lot significantly more time than the non-competitive process, and for grants that are very small, they said that competing the awards can be resource and time intensive beyond the arguable benefits of doing so. They explained that they understand the importance of adhering to the competition policy, and have done so, but that it is more efficient and equally effective to not “jump through those hoops.” Other participants described how they thought the competition policy resulted in better project selection and that more RGI projects should be externally competed. It is important to note again that no instances of violations with the competitive grants policy were raised during the evaluation.

### ***Suggestions Regarding Funding Vehicles***

The following suggestions focus on the use of different funding vehicles:

- Regional participants and some Headquarters participants thought that any viable funding vehicle should be available for the Regions to use as long as RGI would continue to be a funding source (versus a grant program);
- If necessary, guidelines specific to this funding source for use of each type of funding vehicle could be established. A set of guidelines for “best practices” for competitive grant awards, in particular, could be useful.

#### **Example Project: Regional Utilities Systems (RUSS) FY 2005, Region 7, \$30,000**

The Regional Utilities Systems project targeted unsewered communities in Iowa through the development of a replicable business plan as a basis for a Regional Management Entity (RME) for wastewater treatment. Ten counties participated in the project.

Results included an increase in the number of unsewered communities utilizing RMEs for wastewater treatment, an increase in the number of unsewered communities receiving proper wastewater treatment, and an increase in the number of unsewered communities complying with state and federal water quality regulations and standards.

### **3.6 Distribution of Funds by Amount Per Project**

The size of RGI project amounts was raised by a handful of participants as a point of contention. Comments generally were that small projects (e.g., \$25,000 or less, though peoples’ perspective on “small” varies) are less desirable than larger projects. First, Agency wide, smaller-dollar projects (through any of the vehicles, grants, procurement requests, contracts, etc.) are typically not subject to the same process requirements or scrutiny. Second, it is usually harder to identify the results of small-scale projects, particularly because identifying and reporting performance measures and related environmental metrics is a resource and time-intensive endeavor and not feasible for small projects. Some participants also noted that the RGI project funding amount can be misleading because RGI was often only one funding source for a project or effort that was funded additionally either by EPA or by outside parties. Therefore, a project that would appear to cost only \$500 according to the RGI

expenditure report or RGI database, but the same project’s total funding levels could be \$50,000 or even \$5,000,000.

The evaluators examined the funding amounts of the 453 RGI projects analyzed. According to the information in the RGI database, the average project amount was just over \$34,400 and the median was just under \$21,600. Approximately two thirds of all projects were funded between \$10,000 and \$100,000. The largest amount funded was \$325,000 for the Region 6 multi-year project Demonstration of the Alternative Asbestos Control Method, and the smallest amount funded was \$102 for Region 7

*“Externally, we try to limit the burden of an applicant to try to understand different sources of funding. RGI is not an externally branded source of funding. We take on the burden of combining/assigning resources. The applicant tells us what the problem is, and we work to figure out the funding.”*

*– RGI Project Officer*

one-day educational workshop for high school students called Conversation on Climate Change. This information is incomplete; however, because it does not reflect other sources of funding from EPA or elsewhere. In some cases, the RGI funding was a small portion of overall funding and therefore the project’s true cost would be much larger. The extent to which this was the case is not known. At least one Region did, however, intentionally spread its RGI funding across many small projects because it was interested in supporting many types of stakeholders, small communities, etc.

In general the question of project funding levels could warrant further exploration should an RGI-like funding source be established in the future. Other suggestions offered in this report, such as prioritizing funding for larger projects to enable identification of results, could influence the average project amount. Further exploration of how to document “leveraged” funds or other sources of funding for the same project would also be worthwhile. Doing so is likely going to be complicated at best, but would be worth the effort if it helped to clarify RGI’s unique role as a key contributor and leveraging “seed money” type of positive driver for other funding.

### 3.7 Distribution of RGI Projects by Topic

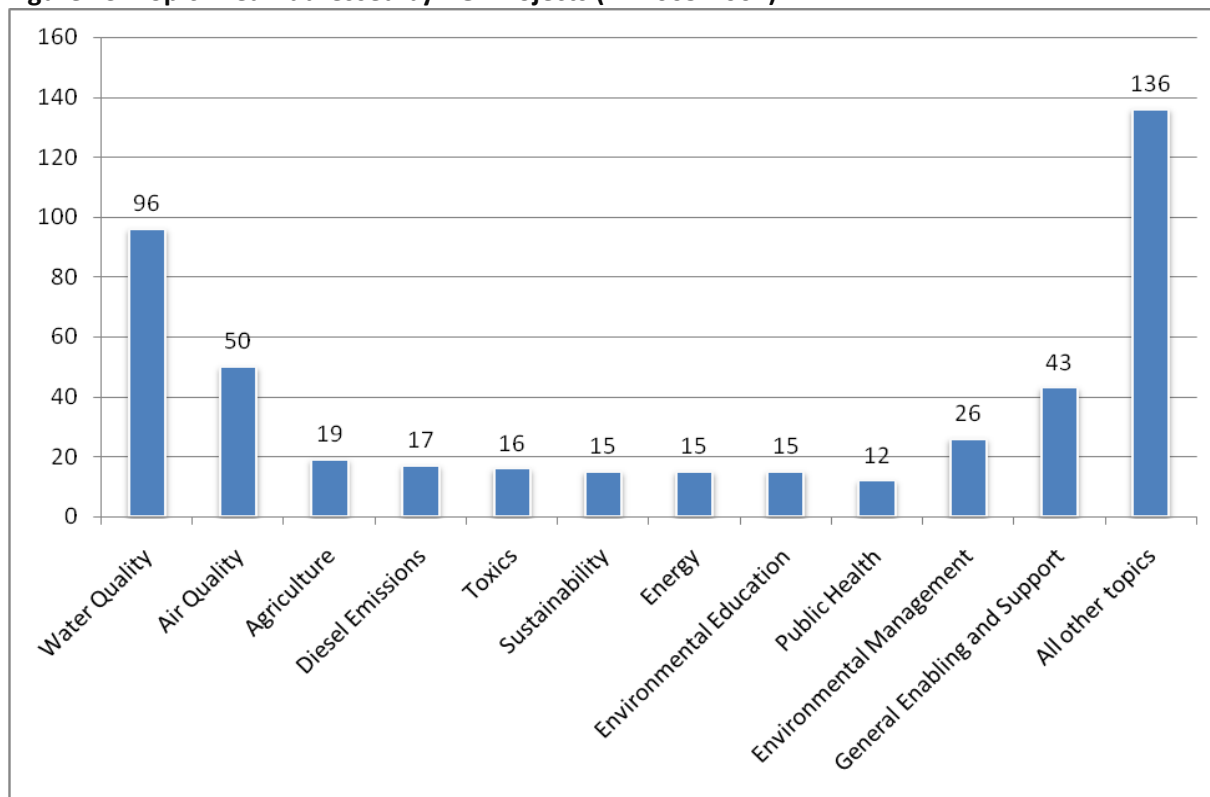
To identify what RGI projects focused on, and in so doing attempt to “decode” at least indirectly how RGI contributed to the Agency’s programmatic work, the evaluators assigned project topics (water, land, air, toxics, etc.) to each of the 453 RGI projects. Topics could also include the project products or activities (e.g., monitoring, workshops, etc.) For example, a workshop on indoor air toxics would have been categorized under the topics air, education, and public health. Therefore, the project topics are not mutually exclusive.

Of the 453 projects analyzed, 43 did not have an obvious connection to the topics listed; most of these 43 projects were oriented toward administrative or support functions and are therefore captured in the category, “General Enabling and Support.” In some cases the information in the database was not complete enough for the evaluation team to determine the topic area that the project was intended to address.

The database analysis results (Figure 13) indicate that RGI projects focused on water and air were the most common, followed by those that provided general and non-topic specific support (e.g., Geographic Information Systems, regional communication and outreach, etc.), and environmental management

(e.g., Lean manufacturing, Environmental Management Systems, etc.). Projects focused on agriculture, diesel emissions, toxics, sustainability, and energy were also well represented. In terms of the types of project activities employed, communications and education and outreach projects (which may have involved one or more media-based topics), were common. The full list of topic areas identified by the evaluation team is shown in Table 5.

**Figure 13. Topic Area Addressed by RGI Projects (FY 2005-2007)**



**Table 5. List of General Topic Areas Across RGI Projects (FY 2005-2007)**

Agriculture	Air Pollution	Air Quality
Aquaculture	Children's Health	Climate Change
Coastal / Ocean Issues	Compliance	Diesel Emissions
Ecoregions	Ecosystems	EIS
Emergency Response	Energy	Enforcement / Compliance
Environmental Education	Environmental Health and Safety	Environmental Infrastructure
Environmental Justice	Environmental Management	Environmental Planning
Environmental Stewardship	Environmental Trends	Green Building
Greenspace	Habitat Conservation and Restoration	Hazardous Waste
Indicators	Invasive Species	Land Cleanup
Lead	Lean Manufacturing	Local Food Production
Mercury	NEPA	Nitrogen
Pesticides	Pollution Prevention	Public Health
Recycling/Resource Conservation	Smart Growth	Stormwater Management
Sustainability	Toxics	Tribal Affairs
Urban Development	Various Local Issues	Waste / Recycling

RGI projects employed and focused on a wide array of activities and approaches to meet project goals. As Table 6 indicates, approximately half of the RGI projects analyzed employed some form of workshops, conferences, outreach, education, or training, which was considered as the projects' results.

**Table 6. List of General Project Activity / Approach Areas Across RGI Projects (FY 2005-2007)**

Collaboration	Communications
Education	Environmental Planning
Information	Leadership Development
Monitoring	Outreach
Partnership Building	Records Management
Stormwater Monitoring	Technical Assistance

These findings support the claim that RGI contributed to each major media area as well as cross-media work and that a variety of approaches and mechanisms were employed in the process. Although these findings are consistent with other findings, in the future additional documentation and tracking could help to clarify the alignment of specific Agency priorities at the national program and regional levels with specific projects funded through a future RGI-like funding source.

### 3.8 Distribution of RGI Projects by Geographic Area/Scale

The evaluators examined the geographic distribution and scale of RGI projects to understand the extent to which RGI supported local versus larger-scale work. A preponderance of local or other small-scale projects would support the notion that RGI was in fact place-based and addressing local, state, or other geographically specific needs that might otherwise “slip through the cracks.”

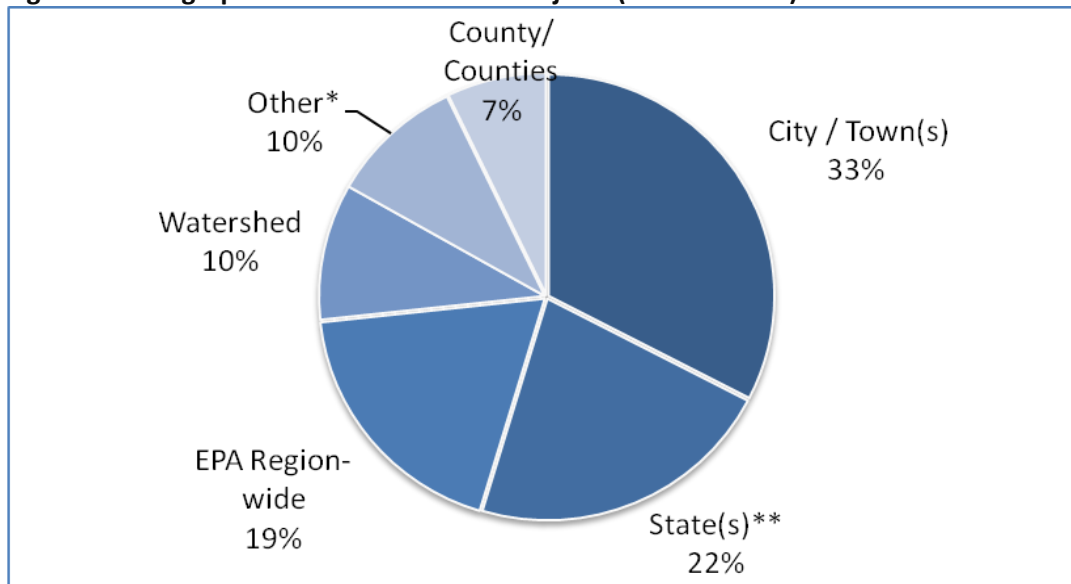
The geographic distribution of a project was defined as the area where a project was intended to have the greatest effect, as opposed to where the project was implemented, although in most cases these were the same with the exception of conferences, workshops, or meetings implemented at a single location but focused on other, typically larger, areas. The evaluation team assigned each RGI project with one geographic identifier using the “geographic region” database field.

**Example Project: City Of Chicago - Byproduct Synergy Product (Waste-to-Profit Project)  
FY 2006, Region 5, \$84,900**

The Waste-to-Profit Project increased awareness of by-product synergy benefits to over 80 companies in the Chicago Metropolitan area, many through participation in the by-product synergy waste-to-profit network. 25 companies reduced their waste by diverting materials from landfills and 16 companies were able to use the waste as feedstock. The project quantified 13,551 tons of waste diverted from landfills, 42,591 tons of reduced CO2 emissions, and a positive economic impact of \$250,000 - \$500,000.



**Figure 14. Geographic Distribution of RGI Projects (FY 2005-2007)**



\* The “Other” category includes coastal areas, air quality districts, estuaries, highway corridors, mountain areas, the Pacific Rim, saltwater bays, ports, water basins, rivers, tribal lands, and valleys.

\*\* The “State(s)” category includes one or more – but not all – states within an EPA Region.

Figure 14 displays the findings on geographic distribution of RGI projects. The largest percentage of RGI projects (33 percent) was focused at the city, town, or local municipality level. This includes projects implemented in cities of various sizes, projects focused on multiple cities and projects focused on specific city neighborhoods. State-level projects were also common (19 percent). These included multi-state projects but not all of the states in the applicable EPA Region. Projects that were Region-wide were also well represented (19 percent), followed by projects that focused on particular watersheds (10 percent). County-level projects comprised 7 percent. The remaining projects (10 percent) focused on a variety of geographic areas, including includes coastal areas, air quality districts, estuaries, highway corridors, mountain areas, the Pacific Rim, saltwater bays, ports, water basins, rivers, tribal lands, and valleys.

**Example Project: Watershed Sustainability  
FY 2006, Region 8, \$62,250**

The Watershed Sustainability project brought together numerous stakeholders to define sustainability in the context of the Clear Creek Watershed. The stakeholders evaluated ecological, economic, and social values (triple bottom line) as a basis for assessing watershed sustainability and identified tools to evaluate public and private sector watershed investments. The project organizers expected to export their results and processes to other watersheds.

These findings support the general claim that RGI supported small-scale geographically based work. They do not conclusively indicate that this work could not have taken place without RGI funding, but when coupled with the other findings described in this report, they do suggest that RGI helped to fill a gap in support for local, state, and other regionally specific needs that were identified by the Regions.

### 3.9 Timing of Funds Obligation and Two-Year Flexibility

Under RGI, EPA Regions were allowed the flexibility to disburse RGI funds over a two-year period. Many interviewees discussed how the allocation of funds typically occurred over both fiscal years. The timing of RGI funding disbursement, particularly considering that in several Regions funds were often dispersed in the second fiscal year, was identified by many evaluation participants as an RGI vulnerability and an area for improvement.

*“Using the grant solicitation process takes substantially more time but improves project selection and ultimately achievement of results.” – RGI Coordinator*

Some interviewees expressed concern that it takes too long to obligate RGI funds, making it appear as if RGI funds were not really needed. A comment made by one interviewee, “we need to ‘Lean’ obligation,” was echoed in spirit by several other participants. At the same time, nearly all participants stated a belief that the option of disbursing RGI funds over a two-year period provided Regions with valuable flexibility. Several participants cited this two-year flexibility as an important attribute of RGI that enabled Regions to be responsive to emerging issues and emergencies and to accommodate more time-consuming disbursement mechanisms, such as a competitive grants process. Many interviewees stated that the two-year funding flexibility was helpful to enable effective outreach with partners and ensure the careful selection of projects that yield better environmental and public health results.

Interviewees described several factors that can significantly affect the timing of RGI funds obligation.

*“With the way project cycles work with the Agency [two year flexibility] is helpful for a number of reasons. Especially at the beginning stages of a project, it is often hard with a project that requires certain sources of money to adopt and learn and be flexible. You otherwise may be forced to commit funds prematurely. I agree that two year flexibility is helpful for managing resources.”*

*– National Program Manager*

- **Delays in federal budgeting.** Many interviewees stated that delays in the passage of EPA’s annual budget often meant that Regions would not know the amount of RGI funds available until several months into the fiscal year, reducing time available to disburse funds in the first fiscal year.
- **Coordination of joint funding from other parties.** Interviewees reported that RGI funds are often used to leverage or supplement funding from other parties. They indicated that it can take significant time to coordinate joint funding efforts, particularly when partners’ funding cycles (e.g., state budget processes) are not aligned with the timing of RGI funds.
- **Alignment with regional priorities.** Some interviewees explained that their Region held off on disbursing RGI funds until regional priorities had been set, which often occurs in the first quarter of each fiscal year. This was done to ensure that grant request for proposal (RFP) guidelines and/or funding decisions were aligned with regional priorities, in addition to the national RGI criteria.
- **Implementation of a competitive grant process.** Most interviewees discussed how competitive grants processes take longer, in some cases substantially longer, than do other funding mechanisms such as contracts that access existing contract vehicles, inter-agency agreements,

and procurement requests. Regions using a competitive grant process for RGI funds would typically wait until budgets and regional priorities had been established before developing RFP guidelines.

- **Emergency reserve funds.** A few interviewees indicated that their Region sometimes deliberately held a portion of RGI funds into the second fiscal year to enable the Region to be responsive to emergency funding needs, such as potential emergent threats to public health. For example, one Region indicated that RGI funds enabled the Region to rapidly respond to indoor air quality concerns at schools in a low income neighborhood.

Several Regions said that they had been working to improve their internal processes to speed up obligation so that most or all funds could be allocated in the first fiscal year of funding. Representatives from a few Regions described focused efforts to get their competitive grant process RFPs out earlier in each fiscal year. For example, EPA Region 8 prepared grant program RFPs in advance of budget allocations being finalized and indicated in the RFPs that project award decisions were subject to final appropriations.

*“Sometimes the timing of the regional decision making [on RGI funds allocation] suggests that RGI is an afterthought or an emergency reserve fund.” – RGI Coordinator*

### *Improving the Timing of Funding Obligation*

Participants provided several suggestions for improving the timing of RGI funds disbursement. These included:

- Retain the two-year flexibility for disbursement of RGI funds to equip Regions to respond to emerging issues and emergency funding needs.
- Designate a portion of the total funds that could be held by Regions for emergency or “immediate need” purposes in the second funding year.
- Prepare and issue competitive grant program RFPs before (or soon after) the beginning of the first fiscal year, even if the final funding amount is not known. Final funding amounts (e.g., number of grants or grant amounts) could be adjusted to fit the final RGI budget allocations.
- Develop an incentive for obligating funds in the first fiscal year, such as reducing subsequent funding available in the second fiscal year or in future budget years.
- Apply Lean or other process improvement techniques to clearly map and streamline RGI grant and funds obligation processes.<sup>11</sup>
- Based on these findings, it is likely that funding obligation could be sped up so that most or all of the funds could be dispersed in the first fiscal year and that, if needed, a portion of the funding could be held as an emergency or just-in-time reserve fund for the second year.

*“Outreach with partners takes the most time.”  
– Deputy Regional Administrator*

<sup>11</sup> See [www.epa.gov/lean/admin.html](http://www.epa.gov/lean/admin.html).

### 3.10 RGI Audiences and Communication

Most interviewees indicated that shortcomings related to RGI information and communications have fueled misperceptions around RGI and severely limited understanding of RGI results. This section explores these issues by identifying who RGI’s audiences are and their informational needs; how information on RGI has been communicated to these audiences; and what kinds of improvements to information collection, performance reporting, and other communications needs would likely be beneficial for any future regional funding source similar to RGI.

*“Project by project I’m not aware of any other program that gathers information at this level of detail.”*  
 – Regional Comptroller

#### RGI Audiences

Assessment of the efficacy of RGI communications requires an understanding of the key audiences who are likely to have an interest in RGI and its results. Table 7 summarizes the key audiences for RGI information identified by interviewees, as well as these audiences’ typical informational interests.

**Table 7. RGI Audiences and their Informational Interests**

Audience Category	Key Constituents	Informational Interests
EPA Regional Managers	RAs, DRAs, and other senior regional managers	<ul style="list-style-type: none"> <li>How RGI funds support achievement of regional and national priorities</li> <li>How RGI funds address emergency issues that have potential to significantly affect public health and environment in the Region</li> <li>Results/effectiveness of RGI-funded projects</li> </ul>
EPA Headquarters Leadership	EPA Administrator, Deputy Administrator, NPMs, and their senior managers	<ul style="list-style-type: none"> <li>How RGI funds support achievement of EPA Strategic Plan goals and objectives and NPM priorities and commitments</li> <li>How RGI funds address emergency issues that have potential to significantly affect public health and environment</li> <li>Results/effectiveness of RGI-funded projects</li> </ul>
RGI Funds Recipients and Partners	States, counties, cities, municipalities, state and local elected officials; NGOs; other organizations in each EPA Region	<ul style="list-style-type: none"> <li>How RGI funds support regional/state/local environmental and public health priorities and needs</li> <li>Results/effectiveness of RGI-funded projects</li> </ul>
Government Public Affairs	EPA Press Office and Public Affairs staff, state and local public affairs personnel	<ul style="list-style-type: none"> <li>How RGI funds support federal/regional/state/local environmental and public health priorities and needs</li> <li>Results/effectiveness of RGI-funded projects</li> </ul>

**Table 7, Continued**

Audience Category	Key Constituents	Informational Interests
Congress and the White House	Congress, Congressional Staff, Congressional Budget Office, Office of Management and Budget, Government Accountability Office	<ul style="list-style-type: none"> <li>• How RGI funds support EPA’s mandate and commitments under the Strategic Plan</li> <li>• Whether and how RGI supports unique public health, environmental, and economic needs not addressed through other EPA programs/funding</li> <li>• Results/effectiveness of RGI-funded projects</li> </ul>
Interested Public and NGOs	Interested public, Government watchdog groups	<ul style="list-style-type: none"> <li>• How RGI funds support EPA’s mandate and commitments under the Strategic Plan</li> <li>• Whether and how RGI supports unique public health, environmental, and economic needs not addressed through other EPA programs/funding</li> <li>• Results/effectiveness of RGI-funded projects</li> </ul>

The section below describes the range of communication activities that have sought to share information on RGI and its accomplishments with various audiences.

### *RGI Information Collection and Communication*

The primary way that information about RGI spending and results was gathered was through the RGI database. Information was entered retrospectively (after the end of each fiscal year) into the RGI database by each Region’s RGI project officers and/or RGI Coordinator. There were also separate reporting requirements for some expenditures such as on grants through the Integrated Grants Management System (IGMS) and at least a few Regions have separate Access databases to track multiple funding sources including RGI. Some projects are also selected for advanced monitoring which requires a detailed write up to be submitted to the grants office and entered into a national database. Finally, ad hoc information collection was conducted for the reporting purposes described below.

*“We didn’t do a good job of speaking the same language with OMB and the appropriators and this left impressions that weren’t so favorable.”*  
 – National Program Manager

Interviewees described several ways that the information collected was used to communicate about RGI-funded work, though not necessarily about RGI itself. Communication activities included:

- **Regional Executive Team Briefings.** In most if not all EPA Regions, the senior executive team received periodic briefings on RGI-funded projects and their results. In some Regions, interviewees reported that RAs and/or DRAs regularly monitored RGI implementation and/or progress of RGI funded projects. Outside of the RGI Coordinators and a select few other regional RGI contact, each Region’s

*“One of the challenges is that if something’s not reported it’s like it didn’t occur.”*  
 – Regional Program Manager

leadership was the most knowledgeable and informed about (its own – not others’) regional RGI activities and results.

- **EPA Web sites.** RGI project summaries are posted on some Regions’ Web sites (e.g., Regions 1, 4, and 8). In addition, the Office of Regional Operations maintains a web site with basic information on RGI (see <http://www.epa.gov/regional/rgi.htm>). Who visits or knows about these Web sites is unclear.
- **RGI Highlights Documents.** EPA prepared reports on RGI called *RGI Highlights* in 1998 and 2007. The 2007 document showcases projects organized around three RGI themes: fostering sustainable communities and empowered citizens, encouraging innovations and sound science, and reducing risks. The 1998 RGI Highlights document showcased ten of the 107 projects supported in 1998, one from each Region. Both Highlights documents are available for download in PDF format on the EPA RGI web site. Based on the interview results, it is unclear who received or read these reports. Outside of the RGI Coordinators and national RGI managers who developed the reports, most stakeholders interviewed were not aware of them, even the recently published edition, and except for a few of the regional leaders, few evaluation participants knew about these reports.
- **RGI Report to Congress.** EPA prepared a Report to Congress on RGI in 2008 in response to a Congressional request.<sup>12</sup> The 450-page Report to Congress summarizes information on all projects funded between FY 2005 - FY 2007 through RGI. A fair number of participants were aware of this report, but none indicated that they had read it. Several noted that they thought this report did not effectively communicate RGI’s role, practices, accomplishments, etc.

In addition to RGI communication activities and products described above, participants described communication activities related to specific projects and initiatives funded by RGI. Press releases, presentations, and other communication activities were used to support individual efforts, although RGI was seldom recognized as a feature of these communications. Several interviewees indicated that, around the time that RGI funding was cut, regional leaders and managers started to increase their efforts to recognize the role that RGI funding played in projects and initiatives, during internal Agency meetings.

### **Who Really Knows About RGI?**

These findings show that awareness and understanding of RGI was strongest within each Region about the RGI-funded projects in that Region only. Regional leaders and RGI Coordinators and, at the individual project level, RGI project managers, were the most knowledgeable. As noted earlier in the report, the evaluators

*“AAs should pull people from across programs to talk about a multi-media model that has worked and that way you get a whole lot more with less effort. Structure it so it met ACS commitments, and give the Region enough money, consistently, to actually fix something. Otherwise, you don’t have any assurance. There are too many question marks: Who is responsible? Is it going to be funded year-to-year?”*  
– Regional Program Manager

<sup>12</sup> The request appeared in H.R. 20643, Consolidated Appropriations Act for 2008 and House Report 110-187 accompanying the FY 2008 Department of the Interior, Environment, and Related Agencies Appropriations Bill. It asked for, at a minimum: (1) the criteria used to allocate the funds to each regional office; (2) the criteria used to select projects by each Region; (3) a list, by Region, of the projects and amounts funded; and (4) a summary of how each project met the selection criteria and its accomplishments.

observed that the senior managers in all Regions had first-hand knowledge of their Regions' RGI-funded work, and many had clearly invested their time and energy into RGI-funded projects during their tenure.

Managers at Headquarters reported much less familiarity with the results of RGI-funded projects and initiatives. One comment made by an interviewee captures the overarching sentiment of many evaluation participants (particularly EPA Headquarters participants) regarding RGI communication: "Everyone is aware of RGI but not of its results." Most senior EPA managers (in the Regions and Headquarters) reported familiarity with RGI and its recent scrutiny and funding cuts, but as discussed only those in the Regions could identify how RGI funds had been spent and what accomplishments RGI

**Example Project: Discover a Watershed – The Red River/Devils Lake Basin  
FY 2002\*, Region 8, \$30,000**

For the bicentennial of the Lewis and Clark Expedition, EPA Region 8 worked with Montana State University to research, develop, publish, and distribute Discover a Watershed: The Red River/Devils Lake Basin KIDs (Kids in Discovery Series) activity booklet. The process of developing the booklet involved stakeholders throughout the basin, and the content directly focused on environmental protection challenges and opportunities from a basin-wide perspective. The primary goal of the booklet was to support local, state, national, and international agencies and organizations in their respective efforts to inform, educate, and involve citizens in basin management programs.

\* Most examples included in the report were from projects conducted in FY 2005-FY2007. This project is included because it was cited as a noteworthy project during the interview with Region 8 senior leaders

funds had enabled – and that knowledge was primarily limited to their own Regions. Some senior managers interviewed at Headquarters had, however, heard about RGI-funded projects at national EPA meetings (primarily Innovation Action Council meetings.)

Two other factors appear to have also confounded RGI communication. First was confusion about whether RGI was a program or a funding source. When RGI was viewed as a funding source, as it was by most of the regional participants, efforts to clearly link and "brand" projects as being RGI were minimal or an afterthought. Several participants thought that, as a funding source, RGI should not have to be named or otherwise "given credit." They explained that, if RGI were a program more name recognition as well as routine results reporting and other program-like communication would have been expected. Second, in many cases, RGI resources funded only part (and in some cases a small part) of many projects. Even though RGI

resources may have played an important role in seeding projects or leveraging other funding sources, this multiple funding source reality complicated the Regions' ability to "isolate" and feature the important role that they believe RGI played.

Finally, while the scope of this evaluation did not explore awareness of RGI and the results of RGI-funded projects among audiences outside of EPA, observations expressed by EPA interviewees suggests that external awareness of RGI and its accomplishments has been quite low. In addition, interviewees indicated that there had not been proactive, coordinated, and comprehensive efforts to communicate about RGI and its results to external audiences. In those instances where external communications have

occurred, they were largely in response to external requests for information, such as with the Report to Congress.

Interviewees therefore indicated on the whole that communication activities were insufficient to convey the role or accomplishments of RGI, or to address concerns about how RGI funds were spent. Instead, RGI had developed a reputation amongst some at Headquarters based not on factual information, concrete examples, or formal RGI communications, but on what people had heard second-hand about “slush fund” decision making. (Note that the evaluators did not try to inquire about or define this term; participants raised it on their own.)

RGI’s negative reputation amongst some at Headquarters was likely fueled further by the not-well-understood decision making around RGI expenditures, by the obscure EPP category of funds, and by the use of funds to support general regional support expenses. In the end, most interviewees identified the lack of effective communication as one of RGI’s biggest weaknesses, and some attributed RGI’s budget cut primarily to the lack of adequate communication. “Too little too late” was cited by a few interviewees in this context.

#### **Example Project: Lead Free Boston Gardens FY 2005, Region 1, \$25,000**

From 2001-2007 the Urban Environmental Program at EPA New England has competitively awarded RGI funds to projects that achieve measurable environmental results through the Healthy Communities Grant Program. From 2003-2007 the Healthy Communities Grant Program competitively awarded 7 grants for innovative lead poisoning prevention work in Boston. EPA New England partnered with multiple stakeholders to reduce lead poisoning, including the City of Boston, Lead Action Collaborative, and the National Center for Healthy Housing. One project funded was the Lead Free Boston Gardens project, which was designed to improve soil in urban neighborhoods. The project involved revising GIS maps of over 125 gardens with improved information, developing remediation strategies on at least 20 new gardens, and retesting on 25 previously tested gardens for changes in lead levels through phytoremediation and composting. Outreach to community gardeners regarding pesticide reduction, integrated pest management, and soil remediation was also conducted. Since launching joint targeting efforts in 2001, elevated blood lead levels in Boston children dropped from 1,123 cases in 2001 to 294 cases in 2008.

### ***Improving Information Collection and Communication***

The following suggestions were offered to improve RGI communication:

- Develop a communication plan that starts with identifying the key audiences and their informational needs.
- Set clear up-front guidance and expectations on reporting for accountability needs. At the same time, consider what accountability requirements are reasonable in relation to the scale of the funding and in the context of a “funding source” instead of a “program.” Similarly, balance the level of effort involved in reporting (for the recipients of the funding as well as for Agency



staff) with the benefits that would result. (The following suggestions would also be considered in light of these considerations.)

- Talk about RGI in the terms of how it meets agency goals and objectives, perhaps by reporting annually on how the funding aligns with NPM and regional priorities, and hold meetings between regional leaders and the NPMs to discuss how RGI projects support the national programs.
- Provide guidance and example measures (or at least categories of measures) as part of the RFPs, IAGs, contract task orders, etc. to help with identification of desirable performances measures prior to funding decisions or early on in the project work.
- Provide more current information on the number and types of projects considered, the rationale for choosing certain projects, actual projects selected, progress/status of projects being implemented, and project interim and final results. Real-time communication and transparency would bring more attention and rigor as well as assure appropriators and EPA Headquarters budget officers that the funds were being used appropriately.
- Conduct a yearly conference or workshop for recipients of RGI funds to share project information, results, and challenges. Consider including a recognition/awards program to acknowledge RGI accomplishments.
- Create an RGI Web site that shows what projects are currently underway in each Region, reports their status, and documents results. (Some noted that this would be more effective than generating more written reports and materials, particularly if it is kept current.)
- Develop concise factual information at the national level. This could include a one-page overview for each Region's work that year and national summary fact sheets.

*“A Web site would be better than a fact sheet. A place to go to see where all the RGI projects are, what is expected to be achieved, by when results are expected, and whether they are on schedule.”*

*– Deputy Administrator*

#### **Example Project: Blue Skyways Collaborative**

**FY 2006, Regions 6 & 7, \$125,000**

The goal of the Blue Skyways Collaborative, established with RGI funds from Regions 6 and 7, is to improve the quality of life in the central United States by reducing air pollution through innovations in fuel, equipment, and energy technology; and through partnerships with stakeholders to identify areas in which voluntary efforts may achieve greater emission reductions than would be possible through individual state or local efforts.

As of August 2007, the Collaborative had enrolled 112 partners, each of whom participated in at least one emission reduction project. Emissions reductions resulting from this program had as of that time totaled more than 576,000 tons per, and fuel savings had totaled almost 22 million gallons.

## 4. Options for the Future

The final two overarching evaluation questions were:

- What changes might be appropriate for a regional flexible funding source? and
- What alternative approaches should be considered for addressing flexible regional funding needs?

Participants were also asked about what would happen if there were no RGI or other equivalent regional flexible funding and about what they would use regional funding for if funds were in fact available. The ideas discussed in response to these questions are summarized in this final chapter, which concludes with a discussion of five general options for future regional funding.

### 4.1 A Future with No RGI or Equivalent Regional Flexible Funding

Regional participants described how, if no RGI or equivalent flexible regional funding were available, they would need to ask NPMs for media/program-based funding for the work previously supported through RGI. Funding obtained through this route would be piecemeal and resource-intensive to obtain, particularly for multi-media needs. Most regional participants thought that the effort it would take to do so would generally not be worth it. (The terms “beg” and “unsuccessful” were used by several regional interviewees in this context.)

*“Right now I have no money to start up a watershed group in a place that badly needs it and has community interest.”*  
– Regional Division Director

With few exceptions, the regional participants thought that there would be no money to fund regional priorities that are not tied to a specific national regulatory mandate. Examples of these types of priorities included agriculture, non-point source pollution, smart growth and green building, innovative approaches and technologies, and sustainability. Due to regional differences, some explained, these and other regional priorities do not typically “compete” well at the national level. They further elaborated by describing how they thought stakeholder collaboration would be less effective because they would have fewer or no resources to bring stakeholders together, how non-profit environmental groups would have reduced opportunities to fund on-the-ground environmental work, and how the Regions would not be able to address emergencies and short-term needs.

*“I would have to beg, borrow, and plead to the NPMs to get funding for the programs that I felt were most critical multi-media projects...”*

– Regional Division Director

When asked further about what specific projects or types of projects could not be supported through other funding mechanisms, the interviewees reiterated the same themes, citing multi-media projects that address geographic issues, community-based work and support for sensitive and underserved populations (non-English speaking communities, farm workers, Tribes, Pacific Islanders, etc.), and small projects that are important but are not directly tied to an NPM.

A substantial majority of regional participants were significantly concerned about a future with no flexible regional funding like RGI provided. One thought that the Regions would be able to find other sources of funding for the most significant needs, and similarly, another thought that the other available

multi-media funding mechanisms, such as those already used by Region 1 under the Health Community Grant Program could help to fill the “void.” Most regional participants, however, including those from Region 1, did not express any degree of comfort with the other existing multi-media mechanisms, largely because they do not afford the flexibility that RGI did.

Headquarters participants had a range of perspectives on whether and how regional needs met by RGI could be met in the future. Participants from the Office of the Chief Financial Officer thought that flexible (“discretionary”) funding would **not** be an option for the Agency on the whole, and thus both the Regions and the national programs would have to seek funding exclusively through the existing annual budgeting process. Other perspectives from Headquarters participants included similar concerns as those expressed by the Regions – that unique regional needs would not be able to be funded or addressed – to focusing instead on ideas about how to try to address regional needs through alternative funding approaches like those described below.

## 4.2 A Future with Some Kind of Regional Flexible Funding

Regions were also asked to share their thoughts about a future with a RGI-type of funding source. When asked what they would like to focus RGI-like funding on in the upcoming years, they cited several ideas, including those listed in Table 8 that reflect some of the common themes of past RGI-funded work as well as some new specific project ideas. Some participants hesitated to cite specific ideas, however, perhaps because they had not yet identified the regional priorities that they would want to support under new Agency leadership or perhaps because they believed there would not be future funding and thus had not entertained the idea on what they would spend the funding on.

**Table 8. Ideas Shared by Regional Participants on Projects that could be Supported by (Hypothetical) Future Regional Flexible Funding**

Analyzing ecosystem services / natural capital
Climate change mitigation
“Green” energy production and development options
Strategies for reducing non-point source pollution
Developing capacity for communities and local governments to address climate change and population growth
Environmental justice work
Estuary programs
Fostering innovative approaches and technologies
GIS work/mapping
Human exposure monitoring
Monitoring water quality
Pilot project to share air quality best practice measures amongst petroleum producers
Ports initiatives
Technical assistance to local governments
US-Mexico border initiatives
Watershed restoration efforts

In response to the questions, “To best meet regional needs, what attributes should a new flexible regional funding source have?” and, “What other options or changes for flexible funding of regional needs do you recommend?” The common responses echoed themes and suggestions that have already been covered in this report. The most commonly and ardently cited “attribute” was regional flexibility in decision making, followed by ideas on how to promote a consistent and transparent process that could be tied more clearly to Agency priorities at the national and regional levels. Several participants also reiterated how they thought that improved communication between the Regions and the national programs could improve collaboration on multi-media challenges, innovative approaches, and other RGI-like priorities.

*[Without RGI] “We would not be able (in some cases) to meet some of our ACS commitments, especially around asthma, pesticides, lead poisoning, toxics, chemical risk reduction, and even some of our tribal assistance and pollution prevention work. Place-based environmental protection, like in urban, rural, suburban areas that have cumulative risks, would suffer. Another need that is very under-funded is environmental justice. This is very underfunded, and needs far outweigh resources.” – RGI Program Officer*

One new theme that arose was the need for regional leadership and representation at Headquarters. Several interviewees described that a desirable attribute of any potential future regional funding source is senior leadership and advocacy at EPA Headquarters. They said that a “champion” is needed. This point was raised most often by regional interviewees, but also by Headquarters interviewees, including a few NPMs.

With due respect for the current managers at EPA Headquarters who have worked very hard on behalf of RGI, interviewees discussed how it would help to have more senior-level advocates who fully understand the important work done by the Regions through RGI and the ongoing need for flexible regional funding. Most likely this champion would continue to be within the Office of the Administrator, they said. A few participants noted that several key positions within the Office of the Administrator which could be logical champions for an RGI-type funding source, such as in OCIR and ORO, have been vacant for several years. One participant put it this way: “Finally, we must get the Administrator to understand how important this funding is.” Similarly, some interviewees discussed the need for the RAs and DRAs to strongly argue for continued regional flexible funding. One interviewee offered the idea of rotating leadership at EPA Headquarters among the national programs to encourage “championing” at that level. Another suggested that members of Congress from the Regions could be advocates.

*“Some of it is a trust issue. Maybe sometime someone didn't do something – and people have long memories.”*  
– Regional Comptroller

Finally, participants were asked, “If RGI is discontinued, what are some potential mechanisms and sources for regional funding? Should the funds be, for example: (a) a specific line item appropriation? (b) a general tap against Agency EPM? (c) negotiated contributions from NPMs? or (d) specific taps from the major NPMs?” Although there was some variation in specific responses, participants on the whole said that these options would be neither be feasible nor desirable. A line item appropriation is not feasible, they explained, and the other options all have significant downsides. Tapping the NPMs would at a minimum set up a negative dynamic between the Regions and

Headquarters and most likely be more problematic than if the Regions simply received all their funding directly from the NPMs in the first place. This option (tapping NPM funding) would also not provide any continuity from one year to the next and would require disparate reporting to multiple parties for projects that combined funding sources for multi-media projects. The complexity and “return on investment” would not be worth it, most respondents thought. A tap on the general Agency EPM might be the most preferred option, but that, too, would create a negative perception at Headquarters about the Regions “taking” funds away from Headquarters for their own purposes.

In short, for a regional flexible funding source to be successful in the future, something different than these options would have to be developed with sufficient buy-in from the Regions, Headquarters (including the national programs), and appropriators.

### 4.3 Options for Consideration

A summary of hypothetical options given the current Agency budget realities and the entire set of evaluation findings, are provided below as a conclusion to this report. First, however, it should be noted that the evaluation originally was envisioned to include a set of “recommendations” for future regional funding. In early 2009, the evaluation team including the EPA evaluation leads decided that in light of RGI’s funding cut, the broader Agency’s budget climate, changes in Agency’s senior leadership, etc., it would be more appropriate to provide a set of general “options” for future regional funding of this nature instead of explicit recommendations. Recommendations at this juncture could be viewed as “putting the cart before the horse” and, instead, general options for the Agency’s internal consideration would be more useful.

*“From our point of view, there is no RGI. We would not focus on trying to improve it.”*

*– Headquarters Participant, Office of the Chief Financial Officer*

#### *Context Underlying the “Options”*

Given that RGI funding continued to be zeroed out in the FY 2009 federal Omnibus budget due to continued concerns from Congress about RGI’s scope and purpose, the first “option” for pursuing future regional funding that resembles the RGI of the past is to decide *whether Agency leaders believe that there is both an argument for and support from within the Agency for pursuing any separate regional funding for environmental projects that would not come directly through the national programs*. The key questions that need to be answered to decide whether decision makers in the Agency want to pursue this, and whether a pursuit of this nature would be viable, may be:

1. *What precisely are the issues that resulted in RGI’s budget being cut?* This evaluation was not designed to answer this question, although the Omnibus language about “continued concerns about the scope and purpose of the program” in light of insights shared by the participants that are relayed in this report may have revealed most or all of the underlying issues. These underlying issues have not, however, been brought forward in a clear manner to all key Agency stakeholders – and this evaluation report does not attempt to communicate these issues for this purpose. If the issues are clearly identified and raised with the right stakeholders, starting with the Congressional appropriators and their staff, the options for resolving them may become more apparent.

2. *Even if the concerns surrounding the RGI are clearly identified and addressed, is there a justifiable need for flexible regional funding that cannot be met through any other funding approach?* Again, this evaluation was not designed to answer this question directly. Nonetheless, it was clear that most of the regional participants thought that *flexible* regional funding was essential to address the gaps and needs that were served through RGI. This question may also warrant additional consideration by the key stakeholders.
3. *Could meaningful results from a (hypothetical) future regional funding source be achieved and demonstrated, and could such a funding source clearly support the Agency’s national priorities and performance goals?* The results of this evaluation suggest that, yes, these results could be achieved and demonstrated, though an investment would be needed to identify viable performance metrics, tie projects to Agency priorities, report on results in a timely manner, etc.
4. *Could sufficient transparency and accountability in allocation and spending be built into a future regional funding source, and could the funding source be sufficiently large to justify the necessary administrative and accountability overhead? Where is that tipping point?* The results of this evaluation do suggest that sufficient transparency and accountability could be built in to a future flexible funding source, but that doing so would require more consistency in regional process and reporting. Also the Agency would want to consider the “tipping point” question to balance expectations on process, reporting, etc. with the level of funding per Region, per project, etc.
5. *If the above questions and concerns can be clearly answered with a strong “yes,” is there sufficient political will at the Agency to develop a proposal for Congressional appropriators for a new regional funding source? And if there is, what approach might be most successful for securing Congressional support and approval (as one interviewee put it, “by an act of God”)?* This question is for consideration by the Agency’s leadership.

*“If you require the Regions to report on results relative to agency priorities the rest will figure itself out.”*

– RGI Coordinator

*“The Regions have a legitimate need for flexibility and moving resources to address the most important problems that may well differ from national perspectives. For planning and strategic planning work for problems that people in those Regions see is important. And there’s no way to do this unless there’s a pot of money to do this with flexibility.”*

– National Program Manager

These questions are intended as “think pieces” to reflect upon when considering whether and how to pursue any post-RGI regional funding options in the future. The evaluators also want to note that they are not experts on the rules or procedures for establishing any new Agency programs, funds, etc. The following options should thus be read as *ideas* that would need substantial review, and likely revision, before becoming truly viable options. Similarly, these options are by no means the only options for future regional funding of this nature.

### ***Option 1. A Reinstated RGI with no Major Changes***

The option reflects support for RGI just as it was. Some participants thought that RGI was effective as it was and that there is not a strong argument for any major structural or procedural change. Most

participants, however, thought that the former RGI approach would be a non-starter because, for the reasons outlined in this report, some changes would be needed to make a future funding source viable given past concerns and current realities. To begin with, funding for “general regional support needs” would either need to be clearly separated from environmental priority project work or be eliminated altogether. Beyond that, additional process improvements would likely be needed, including clear connectivity to Agency national and regional priorities and improved communication to key audiences to allay past concerns. These changes alone make a strong case for the viability of *other* options.

### ***Option 2. A Revamped Regional Flexible Funding Source***

#### ***This option could involve:***

- eliminating the option of funding general regional support through this mechanism;
- tuning but not dramatically changing the national criteria as per the recommendations in this report
- making decision making and related practices more transparent and accountable;
- tying projects and their results to Agency priorities;
- improving communication to key audiences; and
- otherwise maintaining regional decision-making flexibility (e.g., on projects funded, funding vehicles used, size of awards, etc.)

*“We should be more transparent around what we expect and whether we are on target with our expectations... .. Rather than lasso it in by defining what we can do [with the funds], define what we can’t do... ..The great thing about this money is that it really is specific to the Regions. If you try to carve it up into how much should go into water and air and waste it would cut into its purpose.”*

*– Deputy Administrator*

This option would entail making several process and reporting changes, but would keep the overall role and function of RGI with the exception of eliminating the option for supporting general regional needs that are outside of the national criteria. The focus would be more on the *process* for use of the funds rather than on what (specific topics) the funds should be spent on. (One way to achieve this, as suggested by the Deputy Administrator, was to clarify what the funds could not be spent on rather than direct what they could be spent on.) Other suggestions offered in this report, such as working to speed up fund obligation in the first year and balancing reporting requirements with the scale and nature of the funding, would be feasible. Nearly all regional interviewees and a majority of Headquarters interviewees supported some version of this general option, with some variation on specifics.

### ***Option 3. A National Funding Source for the Regions that is Co-led by Headquarters and the Regions, and Implemented and Managed by the Regions***

A third option could be to institute a regional flexible funding source that is co-directed by the Regions and Headquarters, but implemented and managed by the Regions. Each year the regional leaders and a group of Headquarters leaders (possibly including the NPMs) could propose a regional flexible funding source that would address the kinds of place-based needs, multi-media challenges, and other RGI-like regional priorities that are not typically funded through the national programs, but that are of interest to the Agency’s larger mission and set of priorities. Parameters for use of the funds could be jointly established and could include:

- Establishing jointly agreed upon general guidelines on the types of projects that would be funded, but without prescribing specific topics. One possible approach to achieve this could be to agree to a process that links funding decisions to at least one identified Objective or Sub-objective in the Agency’s strategic plan plus one identified regional priority.
- Establishing procedural guidelines about funding vehicles, project selection, timing of funding obligation, reporting, etc.
- Establishing what accountability and internal Agency oversight would entail;
- Once the above have been agreed upon, continuing to divide the funds equally among the Regions and leaving implementation, management, and reporting to the Regions

*“Consistency is the opposite of flexibility in my view. It would limit our ability to tailor our projects to the needs of our Region. [Our Region] has nothing in common with the [other Regions in other parts of the country] for example. Some consistency on some levels for accountability and tracking purposes would be okay but not in the topic areas and more and more criteria.”*  
 – Deputy Regional Administrator

Those participants who considered this option pointed out that there may be precedents within the Agency for this kind of approach. However, the existing programs that resemble this general model may be focused on particular grant programs (e.g., CARE), not on funding sources. It is also unclear whether this option would address the major concerns raised about RGI in the past or whether the Regions would be genuinely interested in this option if the “burden” of pursuing it would not be worth the flexibility and other benefits that they would receive in return.

***Option 4. A National Program for Regional Projects that is Directed by Headquarters and Competed and Implemented by the Regions***

This option would create a program that would involve substantially more input, management, and direction from EPA Headquarters. This would not necessarily be a *grant* program for either the Regions or for external entities as funding could continue to be through other mechanisms, including support to the Regions themselves for internal work on regional priorities, as well as for external parties through multiple funding vehicles including contracts, grants, etc. Suggestions raised by participants related to this option included:

*“At some level if the Agency can't persuade the key players at OMB and politically that this is a valuable source that should be added back in, I don't know that tapping is going to help under any circumstances. It will probably decrease the broad support across the Agency. The best you could probably do is negotiate with each NPM by showing how it will be a benefit for their program. But some projects are across programs, so then what do you do? It's a bad solution, but it may be the only one.”*  
 – Deputy Regional Administrator



- Managing the program through a consolidated competition managed at Headquarters.
- Establishing categories of possible projects based on priorities identified by the Regions and Headquarters (likely including the NPMs). These could include sustainability, innovation, agriculture, etc.
- Holding part of the funding for emergency regional needs that can be tapped on an “as needed” basis or only during a second optional funding year.
- Requiring that all projects be aligned with one or more of the national (NPM) measures in the NPM guidances.

One variation on this option suggested by a participant was holding a fixed amount for each Region to use in accordance with the guidelines, and competing the remaining funds amongst the Regions. In general, it is unclear whether this option would actually meet the regional needs that regional participants repeatedly stated were Region-specific and could not be dictated or pre-identified at the national level. Further, this option may not be of real interest to the Regions if it entailed a cumbersome process or was otherwise so regimented and restrictive that the effort would not be worth the resulting funding (e.g., relatively small-scale funding such as RGI received). On the other hand, this option may be more likely to work within the accepted annual budget planning process and would also be more likely to address past concerns than would other options that might “look and feel” to RGI’s critics more like the RGI of the past.

#### *Option 5. All Funding Through the National Programs (i.e., the Current Status Quo)*

This option is the same as the current *status quo* for FY 2009 and FY 2010; that is, there is no RGI and funding for regional environmental projects is accessed exclusively through the national programs. As has been described throughout this report, those who participated in this evaluation from the Regions thought that a variety of regional needs and priorities cannot be funded or advanced under this scenario. These concerns are summarized at the beginning of this chapter and thus are not repeated here again.

*“Once the money gets down into the Regions it’s more about how the Regions can implement the funding based on Congressional intent for it. There is an issue of transparency on that. The congressional staffers are looking for simple things. If I give you \$7 million what are you going to spend it on? We don’t have to say it 18 months in advance but we have to show a tie between the past and the future or articulate trends between past and future.”*

*– Headquarters Participant*

The current *status quo* option was favored by some of the interviewees at Headquarters who have had the most direct contact with Congressional appropriators. The primary reasons for this option, they explained, were first that appropriators were not going to fund anything that resembled the RGI of the past (given their views on RGI to date), and second, that in this time of significant Agency budget cuts, there would no longer be any discretionary funding allowed within the Agency. Instead of a “reinvented” RGI, they favored administering all regional funding through national program channels and thought that the most important regional needs could and should be funded this way.

## 4.4 Final Observations

The Agency staff who participated in this evaluation felt strongly (one way or another) about RGI. The regional participants across the board passionately described a need for some kind of RGI-like funding to do what they view as mission-critical environmental and public health protection work. RGI critics clearly believed that too much discretion had been exercised with RGI funds and that the expenditures did not clearly result in accomplishments that supported Agency priorities. Some key audiences have not been well informed about how the Regions made decisions on spending RGI funds, what were allowable expenditures, what the funds were actually spent on, or what was accomplished (or not) with those funds in support of the Agency’s priorities.

If the Agency decides to pursue regional funding of this nature in the future, the regional and national program leadership would benefit from coming together to work through the challenges and tradeoffs in a way that builds trust and identifies important needs that are not currently being met through other means. It appears that the RGI of the past is gone – and a new funding source or program, complete with a new name and identity, would need to be born. Most likely, a collaborative process of identifying ways to meet both national and regional priority needs would facilitate creative dialogue about how to solve some of the nation’s most complicated multi-media problems, emerging issues, and under-funded environmental needs in a “win-win” manner for the Agency on the whole and for the environment it is working to protect and restore.

*“It’s hard to strike the balance between maintaining flexibility and maximizing other requirements, but maintaining Regions’ flexibility and identifying funding opportunities [in advance as part of the next year’s budget proposal] are both musts.”*

*– Headquarters Participant*