



## Evaluation of the Region 7 Tribal Grants Programmatic Processes

### Fact Sheet

#### Introduction

- There are nine tribal nations within the geographic boundaries of EPA Region 7, seven of which currently receive EPA grants.
- Region 7 tribes have expressed concerns about the programmatic grants processes, noting that requirements among the different media programs may be conflicting or inefficient and that their priorities have not been sufficiently recognized and addressed through programmatic grant processes.
- The Region 7 Tribal Program commissioned this evaluation to assess EPA's internal processes from initial communications with tribes through submittal in IGMS.

#### Evaluation Questions

1. How can Region 7 make its tribal grant processes more efficient, consistent, and transparent across Regional program areas as well as tribes?
2. How can Region 7 improve its communication and coordination with tribes throughout the entire grants process, from negotiation of grant applications to the management of activities conducted under the grants?
3. Are there ways for the different Region 7 programs to coordinate and collaborate for improved (e.g., consistent) grants management and tribal relations, while still effectively utilizing their specific programmatic expertise?

#### Evaluation Methods

- Focus on four grants EPA issues to tribes: CAA 103, CWA 106, CERCLA 128(a), and GAP
- Review of existing EPA Headquarters and Region 7 guidance documents related to programmatic and administrative functioning of the tribal grant programs;
- Interviews with EPA Region 7 grants and programmatic personnel as well as tribal environmental staff; and
- Developed program-specific organizational charts and process maps to illustrate and organize information received from interviews and guidance documents.

#### Key Findings

##### Efficiency, Consistency, and Transparency

- For the most part, the grant programs evaluated follow the same steps in administering tribal grants, but there are distinctions in how the programs implement these steps.
- Issues that arise are generally attributable to the implementation of the steps rather than the steps themselves.

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## Efficiency, Consistency, and Transparency (cont.)

- Overall, the biggest “sticking point” in the process occurs around workplan negotiation.
- Different program responsibilities as well as budget and staffing realities directly motivate the regional program offices’ structures; distinctions in the organization can impact interactions internally or with the tribes.

### Communication with the Tribes and Issues Affecting Workplan Negotiation

- Many of the issues identified had a common underlying theme: communication issues and personality clashes between EPA and tribal personnel.
- Due to tribal environmental staff turnover, EPA staff often works with tribal staff who have limited experience with grants management.
- Tribal staff cited the turnover of EPA project officers as contributing to delays in the workplan negotiation position. Although newly-assigned EPA project officers may not be inexperienced in grants management, they may lack experience in working with tribes.
- There is a need for more face-to-face or direct communication to improve the efficiency of the review of workplan and QAPP submissions.
- Interviewees noted that more comprehensive and interactive training on working with tribes as sovereign entities would benefit EPA staff.

### Collaboration among Region 7 Programs

- There is no systematic procedure in place to review grants across programs. Some EPA program representatives indicated that their grants’ workplans are cross-checked by GAP PO, however this occurs only on a periodic and ad hoc basis.
- Uncertainty exists over which activities can be funded under GAP. This is not unique to Region 7 and is being addressed by the Agency as a whole.

## Recommendations

- Implement grant programs as consistently as practicable by adhering to Best Management Practices developed by the Regional and Tribal Communications Workgroup;
- Enhance transparency by sharing clear descriptions of the process with Tribes;
- Identify organizational design features that facilitate or hinder efficient operation of the grant program and collaboration among programs;
- Increase direct and face-to-face meetings with Tribes, especially early on and if workplan negotiations hit a snag. When not possible, use webinars and other electronic tools to facilitate communication;
- Better equip EPA staff to work effectively with Tribal staff through improved training;
- Include an assessment of EPA staff’s effectiveness in working with Tribes as part of the annual performance review process; and
- Formalize the internal process to review grants among programs to ensure that activities are funded under the right grants and to limit duplication of effort without putting undue strain on any program office.

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