## **FY 2016 Program Evaluations**

Title and Evaluator	Purpose and Brief	Results and Conclusions	Recommendations,	
	Description		Response, and/or	
			Significance	
	OIG conducted a review to	EPA agreed with all six	OIG recommended that	
EPA Can Strengthen Its	determine whether the	provided proposed corrective	OAR clarify what	
Reviews of Small Particle	agency has used annual air	actions for each	constitutes sufficient	
Monitoring in Region 6 to	monitoring network reviews	recommendation in the OIG's	evidence to demonstrate	
Better Ensure Effectiveness	and assessments to provide	report. All report	compliance with monitor	
of Air Monitoring Network	reasonable assurance that	recommendations are	siting and operational	
(OIG Report No. 16-P-0079)	Region 6's fine particulate	resolved.	requirements when	
	matter (PM2.5) air		developing annual plans;	
Evaluator: Office of Inspector	monitoring network is		develop a process to	
General	achieving its objectives.		update analytic tools for	
	,		future assessments; and	
Publication Date:			emphasize the	
December 2015			importance of network	
			assessments. OIG also	
https://www.epa.gov/office-			recommended that	
inspector-general/report-epa-			EPA Region 6 address	
can-strengthen-its-reviews-			state-specific deficiencies	
small-particle-monitoring-			in monitoring plans and	
region-6			assessments and	
<u> </u>			strengthen its network	
			assessment review	
			process.	
			process.	
EPA's Tracking and Reporting	On May 11, 2012, the Office	The EPA established internal	OIG recommend that the	
of Its Conference Costs Need	of Management and Budget	controls to report	Office of the Chief	
Improvement	issued Memorandum M-12-	conferences both publicly and	Financial Officer (OCFO)	
'	12, Promoting Efficient	to the OIG as required by M-	provide additional	
Evaluator: Office of Inspector	Spending to Support Agency	12-12 and Public Law 113-76.	guidance or training on	
General	Operations. It calls for	However, OIG found	how to identify	
	agencies to ensure that	improvements are needed to	unallowable conference	
Publication Date:	conference expenses are	address the following:	costs, use correct	
January 2016	appropriate, necessary and	8	conference project codes,	
,	managed in a manner that	<ul> <li>OIG found \$6,916 of</li> </ul>	identify all conference	
https://www.epa.gov/office-	minimizes expenses to	inappropriate	costs in the financial	
inspector-general/report-	taxpayers. M-12-12 and	expenses attributed	system, report all	
epas-tracking-and-reporting-	Public Law 113-76,	to two conferences	conference costs paid	
its-conference-costs-need-	Consolidated Appropriations	out of the \$985,851	with EPA funds, and	
improvement	Act, 2014, set forth	of expenses reviewed	classify conferences	
	oversight and reporting	for eight conferences.	properly. OIG also	
		101 eight contenences.	-   -   -   -   -   -   -   -   -	

requirements for agencies with conferences that cost over \$100,000.

In light of this scrutiny over conference spending, the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), sought to determine whether the EPA's internal controls and conference oversight ensure that conference expenses are appropriate and reported accurately.

- The EPA required the use of conference project codes to track and monitor conference spending, but this did not always occur.
- Conference costs were underreported.
- Two conferences totaling \$350,782 were in the EPA conference spending tool but were not reported publicly as required.
- Sixty-four percent of the 227 fiscal year 2014 conferences were reported late or not reported to the OIG as required. Two of the eight conferences sampled were not reported to the OIG at all.

recommend that OCFO work with program offices to identify EPA Form 5170A cost reporting issues and revise the form as needed. The OCFO agreed with all recommendations and provided planned corrective actions with milestone dates. When implemented, the corrective actions should address the recommendations.

Positioning EPA for the Digital Age Requires New Mindsets Toward Printing

Evaluator: Office of Inspector General

Publication Date: March 2016

https://www.epa.gov/officeinspector-general/reportpositioning-epa-digital-agerequires-new-mindsetstoward-printing The Office of Inspector General (OIG) conducted this audit to determine whether EPA printing and publications operations are efficient and effective, and comply with applicable federal guidance.

Executive Order 13589 on printing encourages agencies to limit the publication and printing of hard copy documents, and presumes that information will be provided in an electronic format whenever practicable. Proper stewardship of federal

The EPA's main authoritative guidance for printing operations (Printing Management Manual) is over 20 years old and outdated. The Agency Printing Officer stated that the agency hopes to update its manual once federal regulations are updated. As a result, the manual currently does not provide effective guidance for accountability or oversight.

EPA's current mindset leads the agency to amass large quantities of printed material. EPA staff believe it is cheaper to print in bulk and then store the material. The potential

OIG recommend that the **Assistant Administrator** for Administration and **Resources Management** update the Printing Management Manual to include authorization for decentralized operations within the regions, and issue guidance to reiterate roles and responsibilities. In addition, OIG recommended that the agency establish achievable milestones to address the recommendations in OIG's prior report. The EPA concurred with all of the recommendations, and

resources is an essential the OIG agrees with the for waste is high, as responsibility of agency evidenced by the nearly 8 agency's proposed managers and staff. million items recycled at the actions. When National Service Center for implemented, the **Environmental Publications** corrective actions will between June 2013 and meet the intent of OIG's March 2015. recommendations. Further, the EPA has yet to implement all corrective actions identified in response to a 2014 OIG report on strategic sourcing. The OIG recommended, and the agency agreed, to develop by December 2014 a plan of action to strategically source print management. The EPA has extended its deadlines more than once and still has not established realistic milestones to implement all corrective actions. As a result, the EPA still cannot effectively control print management functions. No Intent to Underestimate The Office of Inspector OIG found no evidence to OIG recommends that the General (OIG) conducted substantiate the hotline Assistant Administrator Costs Was Found, but Supporting Documentation this review in response to a allegations that EPA staff or for Air and Radiation for EPA's Final Rule Limiting hotline complaint about managers purposefully direct the Office of Sulfur in Gasoline Was how the U.S. underestimated costs to Transportation and Air Incomplete or Inaccurate in **Environmental Protection** refineries or intentionally Quality to develop a Several Instances Agency (EPA) estimated misrepresented information process to provide for an costs to the petroleum about its modeling analyses in enhanced quality Evaluator: Office of Inspector refining industry to meet public rulemaking documents assurance review of new sulfur content related to the Tier 3 rule. future RIA documents General standards for gasoline However, during the review when the analysis used to **Publication Date:** under the 2014 Tier 3 OIG identified several support the rulemaking is March 2016 Motor Vehicle Emission instances where descriptions influential scientific of certain aspects of the EPA's information and/or and Fuel Standards (i.e., https://www.epa.gov/office-Tier 3 rule). modeling analyses were cannot be made public. inspector-general/report-no-The Tier 3 rule requires new inaccurate or incomplete in The agency agreed with intent-underestimate-costsemission limits for motor the Tier 3 rule's final this recommendation and was-found-supportingvehicles, as well as reduced regulatory impact analysis proposed an acceptable documentation limits on the amount of (RIA). Based on this corrective action. sulfur in gasoline. The assessment, some of these

primary allegations were that the EPA purposefully underestimated the costs to refineries and misrepresented information in the public record about how the agency modeled these costs. OIG's objective was to determine whether the EPA adhered to relevant statutes, regulations, policies, procedures and guidance in estimating and reporting expected costs to refineries to comply with the Tier 3 sulfur standards.

instances occurred because EPA staff did not update information about their analyses in the final RIA from the earlier version that was developed for the proposed rule. In addition, staffing and time constraints hampered the quality assurance review of the final RIA. The inaccurate and incomplete documentation identified did not impact the EPA's estimate of costs to the refining industry.

RIAs are intended to be comprehensive, detailed documents that describe to the public how the EPA conducted its analyses in support of rulemakings. They help promote accountability and transparency in government actions. Inaccurate and incomplete information in any final RIA could prevent a third party from obtaining a full and accurate understanding of how the EPA arrived at its overall cost estimate, and could undermine public trust in the integrity of the regulatory process. This is especially true when EPA's analyses are identified as influential scientific information and/or cannot be publicly released due to the inclusion of sensitive or proprietary information, as was the case with the EPA's Tier 3 cost model. In these instances, extra vigilance is needed by the agency to ensure that the information

The EPA's data

Management Alert: Significant Data Quality Deficiencies Impede EPA's Ability to Ensure Companies Can Pay for Cleanups

Evaluator: Office of Inspector General

Publication Date: March 2016

https://www.epa.gov/officeinspector-general/reportsignificant-data-qualitydeficiencies-impede-epasability-ensure in the public rulemaking documents is accurate and complete.

In the process of evaluating the U.S. Environmental Protection Agency's (EPA's) progress in reducing taxpayer liabilities through the use of financial assurance instruments for cleanup sites, OIG became aware of significant data gaps and invalid financial assurance instruments that pose a risk to the EPA and taxpayers. OIG is issuing this management alert now because OIG believes that the EPA cannot provide reasonable assurance of proper controls over its programs and operations that protect the public from environmental harm and safeguard federal funds.

Companies with facilities regulated under the Resource Conservation and Recovery Act (RCRA) are required to provide financial assurance that they have sufficient financial assets to cover closure and post-closure costs. Hazardous waste sites regulated under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), or Superfund, are required to obtain financial assurance for the estimated cost of cleanup.

Data quality deficiencies and a lack of internal controls prevent the EPA from properly overseeing and managing its financial assurance program for RCRA and CERCLA. For these programs, EPA data for corporate self-insurance show:

- The estimated total cost is \$9.1 billion.
- An estimated \$577 million is expired.
- More than \$6 billion is insufficient or not documented as being provided to the EPA.

The EPA is aware of the poor quality of its data and the resulting vulnerabilities. The EPA can take steps to mitigate risk to human health and the environment if a responsible company declares bankruptcy or abandons a facility. However, if the EPA cannot determine if it has secured valid and sufficient financial assurance instruments from those private parties, taxpayers are at risk for paying significant amounts of those parties' financial obligations. In addition, public health protections may be delayed or deferred. Despite the EPA's awareness of this risk, it has not taken meaningful steps to address the problem. Furthermore, the EPA has not

deficiencies, coupled with a lack of controls over billions of dollars in financial assurance instruments, significantly impair and threaten the management of the EPA's RCRA and Superfund programs, which present environmental and significant financial risks to the EPA. The agency disagreed with the estimated cost of invalid financial assurance instruments, and OIG's portrayal of human health and financial risk. However, the EPA could not provide any other data on financial assurance to support its disagreement. OIG recommends that the EPA develop and take corrective actions to address the vulnerabilities. In addition, OIG recommends that the EPA include the significant vulnerabilities and exposure related to the RCRA and CERCLA financial assurance data gaps and noncompliance as a material weakness in its Federal Managers' Financial Integrity Act reporting. The agency disagreed that the issue should rise to the material

disclosed this area of weakness level; thus, OIG's recommendations vulnerability in its Federal Managers' Financial Integrity are unresolved as both Act report in the past 5 years. parties work toward a resolution. Office of Inspector General Information obtained through The six recommendations Clean Air Act Facility Evaluations Are Conducted, (OIG) performed this review the EPA's ECHO website made to the EPA include but Inaccurate Data Hinder to determine whether U.S. indicated that many major establishing a process to **EPA Oversight and Public Environmental Protection** facilities had not received conduct regular data FCEs in 5 years, although the quality checks, correcting Awareness Agency (EPA) management controls reasonably assure CMS recommends an FCE identified inaccuracies in Evaluator: Office of Inspector the agency conducts every 2 years. However, OIG ICIS-Air, adding General compliance assurance found the data were recordkeeping activities for major Clean Air inaccurate and that most requirements to the **Publication Date:** Act (CAA) facilities in facilities in the review had agency's CMS guidance, May 2016 accordance with the received an FCE or were no providing guidance to **Compliance Monitoring** longer a major facility. California's local air Strategy (CMS). According districts pertaining to CMS https://www.epa.gov/officeto the CMS, delegated The errors went undetected plans, and consulting with inspector-general/reportagencies should submit a because of limited data states and local agencies clean-air-act-facilityplan that outlines full quality oversight performed regarding sampled evaluations-are-conductedcompliance evaluation (FCE) in EPA Regions 6, 8 and 9. facilities that are overdue inaccurate-data frequencies. Periodic Oversight was needed to for an FCE. The EPA evaluations are essential to verify data entered into the agreed with all of the ensure companies' Air Facility System (AFS) and recommendations in the compliance with EPA laws migrated into the Integrated report and provided and regulations. Compliance Information acceptable corrective System-Air (ICIS-Air) actions with projected timeframes for Using the Enforcement and database, from which the **Compliance History Online** ECHO website pulls its data. completion. (ECHO) website, which pulls Inaccurate data hinder EPA information from EPA oversight and reduce compliance databases, OIG assurance that delegated identified a universe of compliance programs comply facilities that had not with the agency's CMS received FCEs in guidance. Further, 5 years. OIG then selected unreported or inaccurate 65 facilities from EPA data presented on the Regions 6, publicly available ECHO 8 and 9 to review. website could misinform the public about the status of facilities. While FCEs were generally conducted in the three regions, Region 9's

be improved. For example, one California local air district could not locate compliance monitoring reports for several facilities, despite having a records-retention policy that requires the district to keep records for 7 years or up to 2018. In addition, 89 percent of the 35 local air districts in California had outdated CMS plans, and four of the five local air districts reviewed had CMS plans that expired in 2011. Due to these conditions, the EPA has less assurance that local agencies in California are conducting adequate compliance activities, which increases the risk that excess emissions could impact human health and the environment.

management controls could

EPA Region 9 needs to Improve Oversight of San Francisco Bay Water Quality Improvement Fund Grants

Evaluator: Office of Inspector General

Publication Date: August 2016

https://www.epa.gov/officeinspector-general/report-eparegion-9-needs-improveoversight-san-francisco-baywater-quality The U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), conducted this audit to determine whether the EPA: 1) Ensures that grantees are effectively administering San Francisco **Bay Water Quality** Improvement Fund grants through the life of the grant; and 2) Monitors project progress and collects data and/or indicators to determine if proposed project outputs and outcomes are achieved.

The EPA has competitively awarded 33 grants totaling \$40.9 million to 18 different recipients with project

EPA Region 9 did not consistently administer grants and monitor project progress to determine whether proposed outputs, outcomes and milestones were being achieved. Specifically, grant specialist and project officers did not complete baseline monitoring accurately, were sometimes not timely, and did not consistently verify that grantees submitted required documents or reports throughout the life of the grant.

Project officers did not consistently collect progress reports, or review and document monitoring and oversight activities (e.g.,

OIG recommends that the Regional Administrator, Region 9, issue a memorandum (or memoranda) and provide training to grant specialists, project officers and managers associated with the San Francisco Bay Water Quality Improvement Fund grants. The memorandum (or memoranda) and training should cover important topics, such as conducting accurate and timely baseline monitoring; verifying that required documents are received throughout the life of the grant; holding staff accountable for grant periods beginning in fiscal year 2009. The purpose of the program is to protect and restore the San Francisco Bay. review progress reports, document communication, and document site visits). OIG also found that progress reports submitted by grantees did not consistently include sufficient information to determine project progress toward completing outputs, outcomes, milestones and deliverables as identified in agreed-upon work plans and timelines.

management; providing evidence of follow-up and documenting all monitoring activities; obtaining performance reports as required; verifying that performance reports address required outputs, outcomes and corrective action for delayed milestones; and placing required documents in the official grant file. OIG also recommends that Region 9 develop a mechanism or quality review process to verify effective oversight.

Region 9 agreed with the recommendations and provided completed and proposed corrective actions with milestone dates. The corrective actions will apply to Region 9's entire grants program and not be limited to the San Francisco **Bay Water Quality** Improvement Fund grants program. Region 9 also reported that baseline training was provided to all grant specialists on May 2, 2016. The completed and proposed corrective actions meet the intent of the recommendations. All recommendations are open with agreed-to

EPA Needs a Risk-Based Strategy to Assure Continued	Office of Inspector General (OIG) conducted this review	As currently designed and implemented, the EPA's ATP	corrective actions scheduled to be completed by the end of fiscal year 2017. OIG recommends that the Assistant Administrator
Effectiveness of Hospital-Level Disinfectants	of the U.S. Environmental Protection Agency's (EPA's) Antimicrobial Testing	does not assure that hospital- level disinfectant products continue to be effective after	for Chemical Safety and Pollution Prevention suspend administering the
Evaluator: Office of Inspector General	Program (ATP) to determine whether the program ensures the efficacy of EPA-	they are registered. Infrequent testing and reliance on voluntary	ATP until completion of the one-time re-registration process, and
Publication Date: September 2016	registered hospital sterilants, disinfectants and tuberculocides ("hospital-	manufacturer participation reduce program effectiveness. Specifically,	then develop and implement a risk-based testing strategy. At a
https://www.epa.gov/office- inspector-general/report-epa- needs-risk-based-strategy- assure-continued-	level disinfectants"); and to evaluate options for improving the ATP.	OIG found: 1) Once the EPA tests a product and it passes, it is listed as Agency Confirmed Efficacy on the	minimum, the antimicrobial testing strategy should include a framework for periodic
Clean Air Act Facility	Antimicrobial pesticides are designed to destroy or suppress harmful bacteria, viruses and other microorganisms on inanimate objects and surfaces in hospitals and other settings. The EPA has a testing program— the ATP—whose purpose is to ensure that EPA-approved hospital disinfectants and tuberculocides in the marketplace continue to meet stringent efficacy standards.  Products found to be effective are reported to the public on an EPA website, and those that do not meet the ATP efficacy standards need to be brought into compliance.	agency's website and is typically not tested again; the long-term efficacy of the product cannot be assured; and 2) The EPA relies on manufacturers to voluntarily submit product samples for testing. In the last 3 years, out of the approximately 300 registered hospital disinfectant products that have not been tested, manufacturers submitted only 12 samples to EPA for ATP efficacy testing.	testing, define program scope, identify risk factors and methods for selecting products to test, and designate a date to commence risk-based post-registration testing. The EPA agreed with these recommendations and proposed acceptable corrective actions. All recommendations are resolved and open pending completion.
Clean Air Act Facility Evaluations Are Conducted, but Inaccurate Data Hinder	The EPA OIG conducted this evaluation to determine whether U.S. EPA management controls	The OIG found EPA's ECHO website indicated that many major facilities have not received FCEs in 5 years,	The Agency agreed with all of the OIG's recommendations to:

EPA Oversight and Public Awareness

Evaluator: Office of Inspector General

Publication Date: May 2016

https://www.epa.gov/officeinspector-general/reportclean-air-act-facilityevaluations-are-conductedinaccurate-data reasonably assure the agency conducts compliance assurance activities for major Clean Air Act (CAA) facilities in accordance with the **Compliance Monitoring** Strategy (CMS). According to the CMS, delegated agencies should submit a plan that outlines full compliance evaluation (FCE) frequencies. Period evaluations are essential to ensure companies' compliance with EPA laws and regulations.

although the CMS recommends an FCE every 2 years. However, it found that the data were inaccurate and that most facilities in the review had received an FCE or were no longer a major facility. The errors went undetected because of limited data quality oversight.

- Establish a process to conduct regular data quality checks;
- Correct identified inaccuracies in ICIS-Air;
- Add recordkeeping requirement to the Agency's CMS guidance;
- Provide guidance to California's local air districts pertaining to CMS plans, and
   Consult with states and local agencies regarding sampled facilities that are overdue for an FCE.

Drinking Water: EPA Needs to Take Additional Steps to Ensure Small Community Water Systems Designated as Serious Violators Achieve Compliance

Evaluator: Office of Inspector General

Publication Date: March 2016

https://www.epa.gov/officeinspector-general/reportdrinking-water-epa-needstake-additional-steps-ensuresmall The EPA OIG reviewed 10 small drinking water systems in three states/territories (Puerto Rico, Texas, and Kansas) to determine how the U.S. EPA helps states and territories ensure that small community water systems with serious violations come into compliance with health-based standards and Safe Drinking Water Act (SDWA) requirements.

Across the three Regions, the OIG found inconsistencies in adherence to the EPA's Enforcement Response Policy (ERR). Of the thirty systems reviewed, 10 of the systems never received a formal enforcement order, only three of 20 enforcement orders met the timeliness standard in the ERR, and few cases were escalated by the EPA or state when noncompliance persisted.

Each system faced specific challenges that made compliance difficult. In many cases, the EPA and states applies enforcement and compliance tools at their disposal to help the systems. Four systems attained compliance and several others made progress. However, at systems where serious noncompliance persisted, the EPA and states

The agency agreed with all of the OIG's following recommendations to:

- Coordinate the multiple efforts underway in Puerto Rico to improve compliance at priority systems and track whether notice is distributed to customers;
- Take steps to ensure compliance with the ERR;
- Require Regions to provide annual justification for the lack of formal enforcement action; and

Establish a coordinated Action Plan for achieving workgroup goals that draw on expertise and tools across the agency, including inviting other agencies.

		need to engage in a long-term system-specific approach to bring about compliance.	
Integration of climate adaptation criteria into financial mechanisms www.epa.gov/arc-x  Evaluator: Office of the Administrator  Completion Date: On-going Effort	Executive Order 13653 ("Preparing the United States for the Impacts of Climate Change") calls for all Federal agencies to support climate-resilient investments across the nation. The President's Climate Action Plan also committed EPA to integrated climate adaptation criteria into the Clean Water and Safe Drinking Water State Revolving Loan Funds, and into the Brownfields Clean- up Grants.	1	OA is collecting data as grants are awarded and technical assistance is provided. Also, in the mandatory Annual Progress Review meeting with OMB and CEQ, EPA identified as an FY 2017 priority the goal of working with OMB to develop a survey that assessed such usage rates.
		Great Lakes Restoration Initiative grants, Tribal Grants Assistance Program Grants, and Office of Environmental Justice (EJ) Small Grants; (3) established the new Water	
		Infrastructure and Resiliency Finance Center; and (4) provided technical assistance	

		through the National Climate Estuaries Program.	
Title V Permitting Program Reviews  Evaluator: Office of Air and Radiation  Publication Date: September 2016  https://www.epa.gov/title-v- operating-permits/epa- oversight-operating-permits- program	EPA periodically audits state and local permitting programs as part of its responsibility to oversee delegated and approved air permitting programs.	Results vary and are specific to the program being reviewed.	The reviews evaluate the overall effectiveness of the planning, permitting, monitoring and compliance, and enforcement programs to identify good practices implemented by the state/tribal agency, areas needing improvement within the state/tribal program, and ways in which the EPA can improve oversight.
Process for State Implementation Plans (SIPs)  Evaluator: Office of Air and Radiation  Completion Date: On-going Effort	In a February 2014 joint EPA/ECOS/NACAA commitment, EPA and states agreed to work toward eliminating, by the end of calendar year 2017, the backlog of SIPs that existed as of October 1, 2013 and to process new SIPs within CAA deadlines. OAR and the Regions continue to make the SIP process more efficient and effective while fulfilling Clean Air Act statutory responsibilities.	Process has resulted in improved communication and cooperation between EPA and states prior to SIP submittal and SIP development tools.	Data is used to better utilize resources, improve coordination, and support planning, and managing SIP processing backlog.
Evaluator: Office of Administration & Resource Management  Completion Date: March 2016	Improve on EPA's buying power	In FY 2015 Office of Administration and Resource Management's (OARM) use of data and program evaluation tools enabled the agency to monitor specific, measurable data related to print services and cellular services with expected to avoided costs of \$1 million and \$1.4 million respectively in FY 2015.	OARM will apply this same data driven approach to evaluate lab supply and IT helpdesk support sourcing, remediation contracting, and equipment maintenance contracts in FY 2016.

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		Regional Example: In FY 2016, OARM and regional leaders worked together to design and develop a multi- region, \$45 million IT helpdesk strategic sourcing strategy. This included:  1) Gaining CIO-and CFO approval and support of the effort, including formal approval under FITARA as well as WCF approval for new service; 2) Gaining entry into the Working Capital Fund through extensive interactions with all ARAs and IRMBC in the agency, and most IMOs; and Securing first of its kind multi- region strategic sourcing activity.	
National FOIA Program Evaluation  Evaluator: Office of Environmental Information  Completion Date: February 2016  https://www.epa.gov/foia/ev aluation-epas-foia-program	Examine EPA's current implementation of FOIA and identify opportunities to improve the program	Though the FOIA program is decentralized, there is little variation in the written FOIA procedures across offices/regions. However, actual implementation of the FOIA program differs across offices/regions.  • EPA's FOIA program has a strong reputation among federal agencies; however, EPA's backlog has been growing since 2013.  • Organizational changes and technology improvements have the potential to significantly improve EPA's FOIA program; however, the	• Program improvements: The FOIA Program has taken several steps to increase and improve coordination among program offices and the regions. EPA holds monthly meetings with the Agency's FOIA Coordinators, Regional FOIA Officers and Regional attorneys who provide guidance and updates on FOIA related matters. These monthly meetings provide key

		potential benefits need to be weighed against the costs.  • EPA could adopt and/or expand its use of practices to ensure greater consistency in processing and responding to FOIA requests by enhancing the functionality of FOIAonline; improving records management; expanding use of standard templates; developing a list of technologies available to assist with FOIA requests; and exploring options to centralize the FOIA program.	FOIA personnel with ongoing training relevant to the performance of their duties  • Planning and policy decision making: EPA is in the process of issuing new FOIA regulations as mandated by the FOIA Improvement Act of 2016. FOIA procedures will be updated once the new regulation is in place.
Field Testing of a Spectrometer Sensor for Water Quality  Water Quality Monitoring Field Evaluation to determine the viability of new technology in detecting changes in nutrient concentrations between an upstream and a downstream location  Evaluator: Office of Enforcement & Compliance Assurance  Completion Date: July 2016	Standard water quality sampling methods (YSI data sondes and physical sampling/lab analysis) and data were compared to data collected by <i>in situ</i> ultraviolet-visual spectrometry sensors as a method of determining the viability of a spectrometry sensor as new technology for water quality evaluations.	Nitrate values measured by the spectro::lyser were most comparable to standard methods of analyzing for nitrate (EPA Method 353.2). The use of a spectro::lyser provides new information and data of nitrate levels over a continuous period.	The EPA is still determining the utility of spectrometry sensors as an alternative method to traditional sampling. Further study is required to determine the variance from standard methods.
Integrated Pest Management (IPM)  Evaluator: Office of Chemical Safety & Pollution Prevention	An analysis of the IPM in schools grants process and the Centers for Excellence approach.	The review found that the internal processes in place insure effective oversight and management of the IPM in Schools grants. The review	The Center of Expertise contributes to the development and refinement of national program direction,

Completion Date: May 2016		also found that the Center of Expertise for School IPM is performing well in providing leadership and expertise to effect the goal of ensuring that millions of students in our nation's schools benefit from IPM practices and verifiable IPM programs.	provides input and assistance to the Regions on regional strategies and projects to help achieve national school IPM goals, provide technical support to the regions and the school community. Center activities are aligned with the agency's Strategic Plan for School IPM.
Synthesis Report of the US EPA Laboratory Evaluation — follow-up actions  Evaluator: Office of Research and Development  Completion Date: March 2015  https://www.epa.gov/osa/syn thesis-report-us-laboratory- enterprise-evaluation	In March 2015, EPA published its Synthesis Report of the US EPA Laboratory Evaluation to describe actions EPA is taking to strengthen the effectiveness and efficiency of the agency's lab enterprise.	The report indicated that there is potential to save money if we maximize the use of EPA's owned lab spaces. The report also identified several facility consolidations that EPA is undertaking now, several that will begin in the next two years, and two potential opportunities that require further evaluation. As funds from the EPA building and facility (B&F) appropriation become available to implement these facility consolidations, the result will be improved efficiency for the agency's portfolio of lab facilities.	Following the publication of the EPA Synthesis Report, ORD collaborated with partners in OARM, OCFO, and Region 3 to prepare an analysis that illustrates the need for EPA to accelerate investments in physical infrastructure to improve the overall condition of the agency's portfolio of lab facilities. ORD is taking steps to ensure that lab facilities operate optimally to ensure stakeholder confidence in the quality of the science that provides a strong foundation for EPA decisions. In FY 2016, 7 of 16 ORD lab facilities required significant repairs or renovation to improve facility condition. ORD will implement actions identified by EPA leadership. ORD will continue collaboration with OARM on improvements needed for lab facilities with low Facility Condition Index. The construction of the A wing at the Research

Triangle Park campus and modification of the existing laboratory facilities enabled employees in the Reproductive Toxicology Facility to be moved onto the main Research Triangle Park campus, saving approximately \$1.7 million annually in lease costs and \$1 million annually in utilities, security, and operating costs. Partial savings were realized in FY 2015 and full annual savings in FY 2016. ORD's contract consolidation Since the stand-up of the Analysis of performance In 2016, ORD also reached efforts Office of Administration and results indicate ORD was agreement with the Office Research Support's successful in reducing the of Water for the Evaluator: Office of Research **Extramural Management** timelines for onboarding consolidation of peer and Development Division in 2012, the group student contractors from review services has been applying a approximately 8 months requirements into one set Completion Date: under the old procurement of vehicles to be used by systematic approach to November 2015 examining its corporate strategy to under 3 months both entities. The portfolio of contracts and using the National Student resultant vehicles should ensuring that contract Services Contract vehicle. In reduce administrative solutions are implemented addition, ORD saved an costs commensurate with which meet the estimated \$150,000 in the the elimination of agency organization's research first year when comparing vehicles providing similar needs while minimizing expired funds lost under the contracted services, and redundancies and reducing old stand-alone the oversight functions for the total cost of ownership procurements vs. the those excess vehicles, to the Government and improved liquidation and while also providing taxpayers. In 2016, there financial management better transparency and were two significant efforts practices on the new vehicle. information sharing underway: 1) ORD Finally, ORD was successful at regarding the peer review evaluation of the extent to reducing administrative function. Award is which the ORD National burden across ORD, OAM and anticipated in 2017, and OCFO by an estimated four **Student Services Contract** actively supports the achieved the goal of FTE and \$200,000 via the federal-government wide meaningful savings in reduction in the number of category management personnel resources and directives and goals. ORD contract actions being faster, streamlined managed and invoices will monitor implementation of the onboarding of student requiring processing. The service contractors was team primarily responsible contract solutions to

## FY 2016 Annual Performance Report Environmental Protection Agency

being achieved, and 2)	for formulation and	ensure reduction of
examination of existing	implementation were	duplication and
vehicles providing peer	recognized by the Agency	optimization of corporate
review services within ORD	2016 Contract Management	vehicles.
and Office of Water to	Award for their success.	
determine whether an	Based upon the success of	
opportunity for	the program, ORD leadership	
consolidation existed. The	has mandated the use of the	
extramural services	National Student Services	
webpage, including a listing	Contract, unless an exception	
of acting corporate vehicles,	is approved by the Senior	
can be found at:	Resource Official.	
http://intranet.ord.epa.gov/		
p2/Extramural-		
Services/home		