

FY 2018-2019 NPM GUIDANCE RESPONSE TO EXTERNAL COMMENTS

Issue Area	Comment	Commenter(s)	NPM Response
Page 4 – OEI-Exchange Network	We are in the Digital Transformation, equivalent to the next Industrial Revolution and data drives government. The future of government is powered by data. Big data, the Internet of Everything (IoT), sensors, cloud technology, fog networks, emerging technologies, instantaneous data, Smart Cities around the world. In the U.S., 7Lo/o of people sleep with their smart phone. Just about every child on the reservation has a smart phone. With the explosive acceleration of technology, information, and data capabilities and needs, it is very disappointing that the Exchange Network will only have 15 grants available for states and tribes in FY18, down from the 40-50 that were anticipated in FY17. The big push within EPA will be ePermitting. More and more data is collected and reported and systems are being developed, but much less money is being made available for states and tribes to develop and participate in this area. This program needs more funding restored.	Nez Perce Tribe	The Agency has received comments regarding the funding levels requested for the EPA in the President’s Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President’s Budget. The EPA’s funding levels for FY 2018 will be determined through the annual federal appropriations process.
Page 3 – Making a Visible Difference to Communities	OEI notes it will facilitate limited shared service and e-transactions with external partners. States are working with OEI through E-Enterprise on a shared services strategy and appreciate this collaboration. OEI is encouraged to expand this to include “support and maintain” share services and to foster a culture that includes	ECOS	OEI has amended page 3 of its FY 2018-2019 NPM Guidance to incorporate the comment on expanding its shared services narrative.

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	<p>consideration of change management, timely communication to all shared service users, accommodation for inbound and outbound data flows to non-U.S. EPA users, uptime, and others. It would be helpful to states for EPA to publish a strategic roadmap for all planned IT initiatives. This would enable states to strategically align their projects and possible funding with EPA's, and to decrease duplication of efforts.</p>		
<p>Page 3 – Data and Content Management</p>	<p>While states appreciate OEI's commitment to managing data, OEI is encouraged to build upon its key programmatic activities to include data collection, of which states play a key role. OEI is encouraged to provide opportunities for state input on the future direction of environmental and public health tracking and data collection process in addition to existing data collection and management efforts. Some examples of projects where states and EPA are discussing further collaboration follows: Respectful Use of Data. In March, 2011 ECOS passed Resolution 11-2 "Respectful Use of Data." One of the points states make in this resolution is to urge EPA to provide advance notification prior to EPA's release of state data, in particular noting a cooperative process for review and correction of data errors. States encourage OEI to work closely with EPA NPM offices to realize the ideas included in this resolution. Colorado's Environmental Public Health Tracking Project. Colorado Department of Public Health & Environment (CDPHE)'s Environmental Public Health Tracking Project's</p>	<p>ECOS</p>	<p>OEI concurs with this comment and will continue to work through the EPA/state/Tribal governance processes to provide opportunities for input on the future direction of data collection and tracking processes. Current opportunities for collaboration include the eReporting and ePermitting initiatives under the E-Enterprise Leadership Council.</p>

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	<p>goals are to 1) provide data in an easily accessible way through a portal and 2) provide context for its data. Colorado is one of 25 states to receive funding from the Center of Disease Control and Prevention (CDC) to build and implement local tracking networks. Data collected through each state feeds into the national Tracking Network.</p>		
<p>Page 3- Information Security</p>	<p>States appreciate OEI noting their information security goals for FY 2018-2019, including the bullet about focusing on training and user-awareness to foster risk and technology management. States encourage OEI to offer periodic opportunities for states to learn about federal IT requirements that may impact OEI system development or state requirements related to cyber-security.</p>	<p>ECOS</p>	<p>OEI appreciates the feedback and will explore opportunities to provide information on new and existing requirements that may impact development.</p>
<p>Page 4- EPA Geospatial Platform</p>	<p>States appreciate the effort of EPA to build upon its FY 20162017 activities. In regards to the last bullet, "Use the GeoPlatform to publish internal and public mapping tools and make available a number of shareable maps, geodata services and applications," states still suggest OEI work with its co-regulator partners to establish a "Map Layer Marketplace" so the public, co-regulators and the regulated community can create custom web maps either on the E-Enterprise Portal or elsewhere that will allow users to analyze and access environmental data of their choosing in a geospatial context. Map layers could be secured using the federated E-Enterprise Identity Management Solution.</p>	<p>ECOS</p>	<p>Integration of geospatial data services sharing and mapping and analysis capability into the E-Enterprise Portal is an excellent suggestion and area of collaboration between EPA and co-regulators. Resources permitting, OEI has shared this comment with OCFO E-Enterprise and will explore building this capability into the E-Enterprise portal.</p>

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Pages 4-5: Exchange Network	States appreciate the collaboration with U.S. EPA and tribes since 1998 on the successful Exchange Network to efficiently exchange data among co-regulators. OEI notes it will “continue operations and research to maintain currency of data registries...” States, through E-Enterprise, are discussing state facility information along with U.S. EPA’s Facility Registry Service and how these may be better integrated and business rules to guide this. EPA is encouraged to provide resources to continue to support this work so that reporting by the regulated community becomes more seamless across co-regulators.	ECOS	The Agency has received comments regarding the funding levels requested for the EPA in the President’s Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President’s Budget. The EPA’s funding levels for FY 2018 will be determined through the annual federal appropriations process. EPA continues to encourage adoption of data services, including the Facility and Substance Registry Services.
Page 6- EPA Quality Program	States wish to be included in all decisions regarding EPA’s guidance or use of data quality which may also apply to states. States and EPA should continue to work together on the E-Enterprise Advanced Monitoring team that has also discussed issues related to data quality and use.	ECOS	OEI has amended page 6 of its FY 2018-2019 NPM Guidance to incorporate inclusion of states in decisions regarding EPA’s guidance or use of data quality which may apply to states. OEI has shared the comment on data quality and use with the E-Enterprise Advanced Monitoring team in OECA.
Continued Focus on Interoperability	States continue to express a need to keep interoperability as a focal point. An example follows: The E-Enterprise Integrated Identity Solution Project seeks to evaluate identity and access management integration of state Single Sign-On systems with EPA’s Identity Bridge system and determine the impact of implementing a proposed E-Enterprise identity solution. Supported by EN funding, this work is led by NM with WY and ND participating.	ECOS	EPA concurs and supports this statement. Foundational to the Exchange Network and E-Enterprise is the principle of interoperability in the development of shared services and interacting with EPA’s partners. EPA will continue to engage partners through governance and team approaches in developing and enhancing interoperable services, including the E-Enterprise Identity solution.

