Chapter 6: Programmatic Reporting Requirements

READ THIS CHAPTER...

- To understand the three programmatic reporting deliverables for the Section 106 Program.
- To identify the ten elements of a Monitoring Strategy.
- To understand flexibilities in the WQX data reporting requirement.
- To see what content to include in a Water Quality Assessment.

CHAPTER HIGHLIGHTS

- Table summarizing the three programmatic reporting deliverables for the Section 106 Program.
- Tables summarizing the frequency, due date, and relevant work plan component of each of the reporting deliverables.

Chapter 6: Programmatic Reporting Requirements

Tribes are critical partners in helping demonstrate environmental results achieved using Section 106 funds. Tribal information furthers the understanding of national water quality and can be used by local, regional, and national decision makers.

Regular grant performance and programmatic reporting are typical components of EPA grants. Specifically, performance reports help EPA regional Project Officers ensure that Tribes are meeting their work plan objectives and project schedules. Programmatic reports provide specific information about a Tribe's water quality activities. This chapter focuses on:

- The three required programmatic reporting deliverables that Tribes provide to EPA:
  - A Monitoring Strategy.
  - Water quality data submitted into EPA's Water Quality Exchange (WQX).
  - A Water Quality Assessment.
- Resources available to assist with their development.
- Considerations for providing additional reporting flexibilities.
- A summary of the programmatic and grant performance reporting requirements.

EPA needs to demonstrate regional and national results for the Section 106 Program and to understand conditions on Indian reservations in sufficient detail to make effective decisions at a national level. EPA is also responsible for ensuring that funding provided to grantees is used in accordance with the work plan and the grant terms and conditions.

The three required programmatic reporting deliverables contain tribal water quality information that support the program priorities of the Tribe. The Monitoring Strategy serves as the foundation and guide for tribal monitoring and assessment programs. The water quality data and Water Quality Assessments help Tribes compare water quality over time and make informed decisions about their program's future.

Table 8 is a summary of the three required programmatic reporting deliverables for the Section 106 Program.

Table 8: Summary of required programmatic reporting deliverables for the Section 106 Program

REQUIRED PROGRAMMATIC REPORTING DELIVERABLE	DESCRIPTION
1. **Monitoring Strategy**	A Monitoring Strategy is a forward-thinking long-term plan for meeting water resource objectives. The document describes current and future monitoring plans and incorporates an implementation timeline and milestones, and identifies necessary enhancements.
2. **Water quality data submitted through WQX**	The water quality data collected by a Tribe and submitted to WQX is raw sampling information and part of many forms of information a Tribe might use to understand their water quality. Tribes should upload their data into WQX at least once a year.
3. **Water Quality Assessment**	The Water Quality Assessment is a backward looking or summary document that documents the data collected and how the Tribe is comparing water quality results over time. The assessment portion can help a Tribe make informed decisions about the conditions of their water and how their program will address their water quality needs in the future.

MONITORING STRATEGY

Comprehensive Monitoring Strategies help Tribes define water quality goals, document their existing water quality concerns, and plan, build, and expand their water quality programs. Tribes can develop new Monitoring Strategies or submit Monitoring Strategies they already developed using Section 106 funds or other funding sources such as Section 319 funds. More information is in Chapter 5: Development and Implementation of a Monitoring Program.

A 5-year Monitoring Strategy is a long-term plan for meeting each Tribe's identified water resource goals. The document describes current and future monitoring plans while incorporating a timeline and milestones for project implementation. The Monitoring Strategy should be comprehensive in scope. For instance, it should serve all water quality management needs while addressing as many tribal waters as possible, such as streams, rivers, lakes, reservoirs, estuaries, coastal areas, wetlands, and ground water. The strategy should also identify issues and needs hindering an adequate monitoring program. Where possible, a Monitoring Strategy should document the plans and resources needed to address existing gaps or weaknesses in a monitoring program.

Ten Elements of a Monitoring Strategy

1. Monitoring program strategy.
2. Monitoring goals.
3. Monitoring design.
4. Core and supplemental water quality parameters.

5. Quality assurance (QA).
6. Data management.
7. Data analysis/assessment.
8. Reporting.
9. Programmatic evaluation.
10. General support and infrastructure.

Tribes should review their Monitoring Strategy annually and revise the document to incorporate program changes. Tribes should submit their Monitoring Strategy for EPA review at least every 5 years.

Chapter 5: Development and Implementation of a Monitoring Program has more information on each element of a Monitoring Strategy.

How Monitoring Strategies Differ from QAPPs

While a Monitoring Strategy is a long-term general plan for meeting all water quality management needs, a Quality Assurance Project Plan (QAPP) is project specific. As described in Chapter 5: Development and Implementation of a Monitoring Program, the QAPP documents the type and quality of data that the program needs for specific environmental decisions and is directly connected to the activities in a Tribe's EPA-funded grant work plan. Each program's QAPP describes:

- Why, where, and how samples will be collected.
- How samples will be analyzed.
- Necessary data quality.
- How the Tribe will use and evaluate the data.
- The types of decisions that will result from data analysis.

Components of the Monitoring Strategy may be found in existing QAPPs and in some cases, the Monitoring Strategy is included as part of the Tribe's QAPP. Tribes and EPA regional staff may evaluate existing QAPPs and other programmatic documents to determine which Monitoring Strategy elements they cover. Based on these evaluations, EPA regions then determine the additional information the Tribes need to document to meet the Monitoring Strategy requirements.

How Monitoring Strategies Differ from Grant Work Plans

An annual work plan is more project-specific than a Monitoring Strategy. The work plan identifies the activities Tribes will accomplish for a set period and budget. Work plans include activities related to:

- Administering the water program.
- Managing the grant.
- Training.
- Conducting public education and outreach.

- Monitoring and assessment.
- Reporting.
- Other deliverables.

The monitoring and assessment components of a Tribe's work plan are the activities a Tribe will conduct during the grant period to support the long-term goals and objectives of the Tribe's Monitoring Strategy. However, the work plan does not necessarily include all plans and goals identified in a Monitoring Strategy. A Monitoring Strategy describes activities and enhancements the Tribe incorporates into their program over a longer time, making it more comprehensive and strategic in scope than a work plan. EPA does not require Tribes to submit monitoring strategies annually, therefore, this output may not be found in every annual work plan. However, review and revision of an existing Monitoring Strategy may be found routinely in multi-year work plans.

WATER QUALITY DATA SUBMITTED THROUGH WQX

At least annually, Tribes must submit water quality data to WQX for all water quality data they collect with EPA funding. Tribes should identify annual milestones for data input in their grant work plan. If Tribes cannot submit their data directly to WQX, they must submit a justification as to why they could not load data to WQX and provide the Project Officer with the data in a WQX compatible format. (The Alternate Data Submission section below has more information.)

EPA Headquarters, EPA regional offices, and Tribes have developed training materials and templates for data submission. More information is available through EPA regional offices and EPA's *Water Quality Data Upload with WQX* website and additional support is available at wqx@epa.gov.

WQX Compatible Data

To submit data into WQX, there is some required information about the data, known as metadata. Required metadata include:

- Project name.
- Project identifier.
- Monitoring location name.
- Monitoring location type, such as river, stream, or lake.
- Collection method.
- Characteristic name, for example, pH, turbidity.
- Results metadata such as date, analytical methods, unit of measure, sample fraction, and other conditional metadata depending on media type (biological, water, sediment).

Alternate Data Submission

While EPA requires Tribes to upload all tribal data to WQX, EPA may waive this requirement in some instances and allow the Tribe to submit their water quality data to their Project Officer in a WQX compatible format, along with a justification. Tribes can use the WQX Web Template for their data, even if they do not submit the data directly to WQX. Another option is to provide an Excel spreadsheet with the required metadata.

Justification examples:

- Inadequate internet access.
- Funding limitations.
- Loss of key staff.
- Training needed.

The Tribe's justification for waiving the WQX submission should include: a description of the limitation or impediment to water quality data entry directly to WQX (see the "Justification examples" text box), a proposed plan to address the issue, and a proposed time frame to meet the programmatic reporting requirement. Information provided in the justification will assist EPA in addressingbarriers to data submission to WQX, where possible. Tribes should send WQX compatible data and justification details to their regional Project Officer in accordance with the annual milestone in their grant work plan. A sample justification is provided in Appendix C: Sample Justification for WQX.

WATER QUALITY ASSESSMENT

Tribes develop a Water Quality Assessment every one to two years, with the due date found in the EPA-approved grant work plan. Tribes should discuss the frequency of submitting their Water Quality Assessment with their EPA regional Project Officer to determine if annual or two-year reporting best supports their program objectives and retains capacity. The complexity and length of the Water Quality Assessment will vary based on the Tribe's monitoring program, staff experience, capacity, and available funding. For instance, Tribes with established programs may include more complex narrative and graphical descriptions of water quality goals and how to achieve them, while Tribes that have started their programs more recently may deliver baseline monitoring type reports. Tribes might be able to identify the causes and possible sources of water quality impairment/degradation in their Water Quality Assessments. Table 9 lists questions that the Water Quality Assessment addresses and examples of content to include.

Table 9: Questions that the Water Quality Assessment addresses along with example content

POTENTIAL QUESTIONS WHEN DEVELOPING ASSESSMENTS	INFORMATION TO CONSIDER
What data are available?	• Narrative text with site descriptions. • Basic data summary table(s). • QA/Quality Control (QC) review.
What do the data represent?	May include information above, plus: • Map of monitoring locations. • Data displayed graphically. • QA/QC summary. • Thresholds for results comparison. • Data observations.
What progress has the program made toward their water quality management goals?	• Assessment of condition and trends, as available. • Identify causes and possible sources of impairments. • Assessment methodology.

The Water Quality Assessment contains basic information about water quality monitoring activities, assessment decisions, and describes how the program is meeting the goals laid out in the Monitoring Strategy. As more monitoring is conducted, the Tribe's Water Quality Assessment becomes increasingly comprehensive. The major components of a Water Quality Assessment for a Tribe should include the following:

1. An atlas table of tribal water resources. An atlas should include the estimated number of stream miles, lake acres, wetland acres, or estuarine square miles on the Tribe's reservation. This information will most likely stay the same from year to year unless the land base changes.
2. A narrative description of tribal water quality monitoring programs and assessment methods. This information will most likely stay the same from year to year unless the land base changes. Refer to Chapter 5: Development and Implementation of a Monitoring Program for more information on developing a water quality monitoring program.
3. Narrative description of results of water quality monitoring on the Tribe's reservation. This should include an interpretation and summary of the findings of tribal monitoring activities, including probable causes and sources of impairment.

4. Brief narrative descriptions of issues of tribal concern and potential actions to address them.

The Tribal Assessment Modules on EPA's Ambient Water Monitoring and Assessment website have more information on Water Quality Assessments, including examples and technical guidance.

PROGRAMMATIC REPORTING FLEXIBILITIES

EPA recognizes that staffing, financial constraints, and other factors vary among Tribes. Therefore, EPA regional Project Officers may adjust individual reporting requirements on a case-by-case basis. EPA may waive a specific requirement, for instance, if a Tribe can demonstrate that the required deliverables would cause an undue hardship, or that there are circumstances beyond the Tribe's control. Some potential examples include, but are not limited to, natural disasters, such as fire or drought, and other hardships, such as a pandemic, that may limit the Tribe's ability to conduct and report monitoring activities.

Freedom of Information Act

Tribes may need to protect certain information from release. For example, confidential business information, some personal privacy information, and limited other tribal information may be exempt from disclosure under the Freedom of Information Act (FOIA) or special provisions at the EPA regional level. Tribes should discuss any data sensitivity issues with the Project Officer during work plan negotiations.

GRANT PERFORMANCE REPORTING

All grantees are required to provide performance reports and to participate in joint evaluations. Chapter 3: Grant Requirements includes more information on financial and performance reporting requirements.

SUMMARY OF REPORTING DELIVERABLES

Table 10 provides a summary of the three required programmatic reporting deliverables and other common deliverables for the Section 106 Program. Tribes must include all the elements in Table 10 in their work plan as programmatic reporting and performance deliverables and provide the deliverables to EPA no less frequently than listed in Table 10. Tribes may be responsible for other administrative and financial reporting requirements under 2 CFR 200.328.

Table 10: Reporting deliverables for the Section 106 Program

MONITORING STRATEGY	
Frequency	Submit at least every 5 years. Review annually to identify any necessary revisions.
Due Date	Due 5 years after the previous Monitoring Strategy was reviewed and submitted to EPA.
Work Plan Component	At least every 5 years a commitment and output to develop, review, or revise a Monitoring Strategy when appropriate. EPA encourages Tribes to include an annual review of their Monitoring Strategy as a work plan commitment to identify any necessary revisions.
Format	See the *Developing a Tribal Water Quality Program Monitoring Strategy* supplement.
WQX DATA SUBMITTAL	
Frequency	Annually, for all water quality data they collect with EPA funding. Or, if the Tribe cannot submit data directly to WQX, then annually submit data in a WQX compatible format directly to EPA regional staff along with a justification of why they could not load their data to WQX.
Due Date	Due with the Final Performance Report (120 days after grant project period ends).
Work Plan Component	Annual submittal as a work plan commitment and an output.
Format	More information is in the *Tribal Data Management for WQX Submission* supplement. Also see the *Water Quality Data Upload with WQX* website or e-mail wqx@epa.gov.
WATER QUALITY ASSESSMENT	
Frequency	Every one or two years. Tribes should work with their EPA regional Project Officer to determine if the tribal water quality program is best supported by an annual or two-year reporting cycle.

Table 10 Continued: Reporting deliverables for the Section 106 Program

WATER QUALITY ASSESSMENT	
Due Date	Due with the Final Performance Report (120 days after grant project period ends).
Work Plan Component	Identified as a commitment and output in the grant work plan every 1 or 2 years.
QUALITY ASSURANCE PROJECT PLANS	
Frequency	Submit with each new sampling project and as specified in the grant award. Complete an Annual Review each year.
Due Date	EPA must approve the QAPP before Tribes can collect or use environmental data described in the QAPP.
Work Plan Component	Required annual work plan commitment to review QAPP.
Format	*Quality Assurance Project Plan Development Tool*.
PERFORMANCE REPORT	
Frequency	The grant agreement will specify quarterly, semi-annually, or annually.
Due Date	Select one that corresponds to the frequency (example dates for a grant awarded on October 1): *Quarterly* 1. Quarter 1 Progress Report (October to December). 2. Quarter 2 Progress Report (January to March). 3. Quarter 3 Progress Report (April to June). 4. Quarter 4 Progress Report (July to September). *Semi-annually* 1. Semi-annual Progress Report (October to March). 2. Semi-annual Progress Report (April to September).

Table 10 Continued: Reporting deliverables for the Section 106 Program

PERFORMANCE REPORT	
Due Date	*Annually* Annual Progress Report (October to September). Reports submitted annually by the non-Federal entity and/or pass-through entity must be due no later than 90 calendar days after the reporting period. Reports submitted quarterly or semiannually must be due no later than 30 calendar days after the reporting period.
Work Plan Component	Listed as a work plan commitment and output. Submitted as a deliverable.
Format	Detailed progress reports for each grant component and describes achievement of milestones. 40 CFR 35.515 2 CFR 200.329
FINAL PERFORMANCE REPORT ("CLOSE-OUT REPORT")	
Frequency	Submit 120 days after grant closes.
Due Date	Due 120 days after grant project period ends.
Work Plan Component	Submitted as a deliverable at the end of the grant period.
Format	Summary of activities successfully completed to address all work plan commitments. 40 CFR 35.515 2 CFR 200.329