Summary of Input from State, Territory, and Tribal Partners for OCIR FY 2025-2026 National Program Guidance

Process for Soliciting Early Input

Name of Organization	Venue	Date
State Grants Subgroup (SGS)	SGS Meeting	Aug. 3
ECOS	E-Mail, SGS Meeting	Aug. 3, Sept. 14
Regional Indian Coordinators (RICs)	E-Mail	Aug. 10, Sept. 14
NEPPS Coordinators	NEPPS Coordinator Call, E-Mail	Aug. 28, Sept. 14
NEPPS Coordinators, SGS, RICs	E-Mail (Deadline extension)	Sept. 29

Highlights of Early Input from States, Tribes and Associations

After soliciting early engagement from States, Tribes, and Associations, OCIR received input from The Environmental Council of the States (ECOS), Nebraska, and Iowa. Comments were received on four main areas related to OCIR's National Program Guidance:

NEPPS: PPAs/PPGs

The Nebraska Department of Environment and Energy (NDEE) recommends:

- Language added in the NPG to the "Performance Partnership Agreements Section" that details the benefits/advantages related to the development and utilization of a PPA.
- Additional language be added to the "Development of a PPG Workplan" subhead under the "Implementing PPGs" header.
- A clearly defined workplan negotiation schedule or timetable would be beneficial and
 efficient for both state partners and EPA and the process would be improved if negotiations
 culminated at the application deadline date.

Iowa Department of Natural Resources recommends:

 Advance process for the workplan development between the technical leaders. This allows both teams to explore topics prior to the submission of the workplan which makes the formal review and approval process more efficient.

ECOS recommends:

- Flexibility in funding, planning processes, regulatory actions, and Agency guidance allows.
- Maximize flexibility for states to use federal grants for the highest priority needs in their areas.

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 Work closely with states to adjust resources to meet changing priorities, collaboratively resolve planning issues, and provide flexibility in developing state work plans such as through Alternative Compliance Monitoring Strategies and other means.

E-Enterprise: New Technology, Infrastructure and Electronic Platforms

ECOS recommends:

- Support increased federal funding for states through categorical grants, including allowing funding flexibility such as offered through PPGs, U.S. EPA's E-Enterprise Workload Tradeoffs, and other mechanisms, to carry out delegated/authorized/primacy federal programs.
- Prioritize investments in data modernization and technology and follow the principles of the E-Enterprise for the Environment Digital Strategy.

Data Collection

ECOS recommends:

- Take a holistic approach to data collection, considering potential new information needed alongside what reporting may no longer be needed, what information is not being utilized that could stop being collected.
- Avoid duplicating environmental data collection.
 - ECOS may already collect data that could be shared more broadly so that states are not reporting information more than once.
 - Conduct a complete review of needed and/or under-utilized information will allow resources to be better directed.

Agency Measures

ECOS recommends:

General

 To the greatest extent possible, program measures should reflect environmental outcomes, as opposed to outputs, and should include metrics for evaluating incremental progress towards these goals.

EPA-State Communication and Coordination

- Commit to early, frequent, and substantive engagement with states as environmental coregulators.
- Streamline annual grant workplan development, states recommend U.S. EPA support establishment of electronic collaborative forums between regions and states that can be used to develop and negotiate grant workplans.

Training and Technical Assistance

• Training as crucial to build and maintain institutional knowledge.

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 Prioritize activities to ensure the development and delivery of training and technical assistance for state agencies, consistent with ECOS Resolution 18-2 on Adequately Funded Training Programs for Environmental Success.

Next Steps

OCIR and the EPA regions will consider the early input received from state, territory, and tribal partners in developing the FY 2025-2026 National Program Guidance.

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