

## Action Item Review Forms

The EPA Region should collect current status information for action items identified during the two previous PQR cycles, FY2012-2017 and FY2018-2022, and include the results in the PQR report. The Region can use the forms below or another method to facilitate this task. If using these forms, the Region should prepopulate them according to the instructions below, adding rows as needed. The Region should then send the forms to the state, and request their completion and return prior to the state visit so the results can be discussed during the visit.

Note that for any action items that the state indicates have been resolved, reviewers should use the permit reviews and interviews with the state as an opportunity to verify whether those items have been sufficiently addressed.

### Essential action items:

The Region should use Form 1 to collect status updates on all essential<sup>1</sup> action items. The Region should use the Action Item Database<sup>2</sup> to generate an Action Item Report listing the essential action items from the FY2012-2017 and FY2018-2022 cycles. The report lists all essential action items as well as a history of all the updates previously reported by the state or Region. Using the Action Item Database will ensure the most up-to-date information is used to identify previous essential action items and prepopulate the review form. This is important because action items might change after a PQR report has been published, for example if:

- The wording of an action item changes to improve clarity or include more accurate regulatory references.
- A multi-part action item is split into separate items to aid in progress tracking.
- The action item's category changes from essential to recommended, or vice versa, based on further evaluation.

The Region should share the Action Item Report with the state for reference. If the Region needs assistance accessing the Database or generating reports, please reach out to the PQR Lead or Action Item Manager at EPA Headquarters.

### Recommended action items:

Regions should use Form 2 to collect status updates on all recommended action items. Since recommended action items are not tracked in the Action Item Database, Regions should refer to the previous PQRs to identify recommended action items. PQR reports from the FY2018-FY2022 cycle should contain all action items from that cycle as well as from the FY2012-FY2017 cycle, so that

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<sup>1</sup> During the 2012-2017 PQR cycle, essential action items were known as "Category 1" and addressed inconsistencies with respect to federal regulations. In addition, "Category 2" or "Category 3" action items are now consolidated into a single category: recommended.

<sup>2</sup> The Action Item Database is an internal EPA tool for tracking progress on resolving essential action items. Through the Database, EPA Headquarters and Regions can export reports, summarizing the status of action items, to share with states for review and discussion.

report alone should be sufficient to identify all the previous recommended action items. Previous reports can be found on the [NPDES PQR Reports](https://www.epa.gov/npdes/regional-and-state-npdes-program-and-permit-quality-review-pqr-reports) website.<sup>3</sup>

### Completing Action Item Review Forms:

1. *Program Area*: For recommended action items, this is the section of the previous PQR report where the action item was identified (e.g., Permit Applications, WQBELs, Administrative Process). For essential action items, the Action Item Database might identify more than one program area for an item (e.g., both whole effluent toxicity and reasonable potential) or reassign an item to a more appropriate category (e.g., moving a nutrient item to reasonable potential). This helps EPA track items across multiple program areas. For the purposes of prepopulating Form 1, the Region may choose to include all categories to be more comprehensive, or only one category to simplify the form.
2. *Action Item Title*: For recommended action items, this is the title as written in the previous PQRs. For essential action items, this is the title as written in the Database. The Region should use the Database for essential action items to ensure the most recent wording is used.
3. *Action Item ID*: Each essential action item has a unique ID in the Database to facilitate identification, tracking, and updates. The ID is typically structured as XX-YY-ZZ, where:
  - a. XX – state code abbreviation
  - b. YY – PQR year
  - c. ZZ – number assigned to action item

For example, AK-19-04 is the fourth essential action from the 2019 Alaska PQR.

4. *PQR Year(s)*: Identify the PQR year in which the action item was established. For essential action items, it is generally the same year referenced in the “YY” field of the Action Item ID. Typically, EPA refers to PQRs by the year they were conducted, not the year the report was published. For example, if a PQR was conducted in July 2021 but the report was published in October 2022, the PQR year would be 2021. However, for some older action items, the “YY” field of the Action Item ID might identify the year the report was published or the action item was entered into the database. Reviewers should ensure the appropriate year (year conducted) is identified for this column of the table.
5. *Status*: For action items that have already been reported as resolved in the Action Item Database/Report, the Region can indicate that status. Otherwise, the state should provide the current status of the action item and supporting description, if applicable.
6. *Percent of action items resolved*: Indicate at the bottom of each table the percent of action items that have been resolved. This may need to be revised based on further discussion with the state during the PQR process.

The review forms can be separated from these instructions when shared with the state.

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<sup>3</sup> <https://www.epa.gov/npdes/regional-and-state-npdes-program-and-permit-quality-review-pqr-reports>

## Action Item Review Form 1. Essential Action Items from Previous PQR(s) for [State]

*Instructions for state:* This form contains essential action items identified during previous PQR cycles (FY2012-FY2017 and FY2018-FY2022). It has been prepopulated by the EPA Region. The state should complete the “Status Update” column:

- For *resolved* action items, the state should confirm or update the information and describe how the action item was resolved.
- For *unresolved* action items (i.e., a status is “in progress” or “not started”), the state should indicate the current status of the item from the drop-down list and describe the state’s progress toward resolving the action item.

Program Area <sup>4</sup>	Action Item Title <sup>5</sup>	Action Item ID <sup>6</sup>	PQR Year(s) <sup>7</sup>	Status
				( Choose an item. ) <i>[For resolved action items, describe how the item was resolved. Otherwise, describe the state’s progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
				( Choose an item. ) <i>[For resolved action items, describe how the item was resolved. Otherwise, describe the state’s progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
				( Choose an item. ) <i>[For resolved action items, describe how the item was resolved. Otherwise, describe the state’s progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
				( Choose an item. ) <i>[For resolved action items, describe how the item was resolved. Otherwise, describe the state’s progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>

<sup>4</sup> For some action items, the program area might have been recategorized following PQR report publication, or assigned to multiple categories.

<sup>5</sup> The wording of an action item may have been revised following PQR report publication to improve clarity. Some action items might have been split into separate items to aid in progress tracking, and other items might be added/removed based on reevaluation of their essential or recommended status.

<sup>6</sup> EPA assigns a unique ID to each essential action item to facilitate identification, tracking, and updates.

<sup>7</sup> A PQR is typically referred to by the year the state visit was conducted, not the year the report was published.

Program Area <sup>4</sup>	Action Item Title <sup>5</sup>	Action Item ID <sup>6</sup>	PQR Year(s) <sup>7</sup>	Status
				<i>item, including next steps, and any challenges to resolving the item.]</i>
				<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
				<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
				<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
				<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
				<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
<b>Percent of essential action items resolved:</b>				<i>[Provide percent here]</i>

## Action Item Review Form 2. Recommended Action Items from Previous PQR(s) for [State]

*Instructions for state:* This form contains recommended action items identified during previous PQR cycles (FY2012-FY2017 and FY2018-FY2022). It has been prepopulated by the EPA Region. The state should complete the “Status” column for all action items. Recommended action items are addressed at the discretion of the state and while EPA believes these action items are valuable and would strengthen the state’s program, the state is not obligated to address them. In such cases, “Not Pursuing” can be selected as a status option.

Detailed descriptions of how the state is addressing or has resolved the items are not expected, but are encouraged. The EPA Region may use that information to highlight the state’s progress and identify best practices.

Program Area	Action Item Title	PQR Year(s) <sup>8</sup>	Status
			( Choose an item. ) <i>[For resolved action items, describe how the item was resolved. Otherwise, describe the state’s progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
			( Choose an item. ) <i>[For resolved action items, describe how the item was resolved. Otherwise, describe the state’s progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
			( Choose an item. ) <i>[For resolved action items, describe how the item was resolved. Otherwise, describe the state’s progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
			( Choose an item. ) <i>[For resolved action items, describe how the item was resolved. Otherwise, describe the state’s progress toward resolving the item, including next</i>

<sup>8</sup> PQRs are typically referred to by the year the state visit was conducted, not the year the report was published.

Program Area	Action Item Title	PQR Year(s) <sup>8</sup>	Status
			<i>steps, and any challenges to resolving the item.]</i>
			<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
			<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
			<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
			<i>( Choose an item. ) [For resolved action items, describe how the item was resolved. Otherwise, describe the state's progress toward resolving the item, including next steps, and any challenges to resolving the item.]</i>
<b>Percent of recommended action items resolved:</b>			<i>[Provide percent here]</i>