

# Region [XX]

## NPDES Program and Permit Quality Review for [Insert State]

Review Date: [Insert date of remote/on-site visit]

Report Date: [Insert date report published]

U.S. EPA Region [XX]

[Insert Address]

**NOTE:** This report template provides the PQR author(s) with standardized language and organization to facilitate the writing process. Standardized template/boilerplate language, shown in **black font**, promotes national consistency among PQR reports. Any alterations to template language should be minimal. Within the template text are fields for the author to specify certain information. Instructions/guidance for drafting the report sections are shown *[in brackets and italicized in either red font or blue font]*. Replace or delete these fillable fields/instructions after providing the PQR-specific content. Ensure that all final report font color, upon updating, is **black**.

Throughout the report, the author should preface any information provided by the state (such as from the *Questionnaire*) using language such as "the state reports" or "the state indicated that", unless EPA has independently confirmed the statement's accuracy.

*When citing specific regulations, include a link to the appropriate [eCFR.gov](https://www.ecfr.gov) reference.*

## Contents

I.	INTRODUCTION .....	3
II.	STATE PROGRAM INFORMATION.....	4
A.	Program Background .....	4
B.	Permit Universe .....	4
III.	PQR FINDINGS .....	5
A.	Core Review .....	5
	<i>Table 1. Core Review Essential Action Items.....</i>	<i>7</i>
	<i>Table 2. Core Review Recommended Action Items.....</i>	<i>9</i>
B.	Regional Topic Review .....	11
1.	<i>[Insert Regional Topic Title].....</i>	<i>11</i>
	<i>Table 3. [Insert Regional Topic] Action Items .....</i>	<i>12</i>
IV.	ACTION ITEMS SUMMARY AND STATUS .....	13
	<i>Table 4. Essential Action Items Identified During the [Insert Year(s) of Current and Previous PQRs] PQRs .....</i>	<i>13</i>
	<i>Table 5. Recommended Action Items Identified During the [Insert Year(s) of Current and Previous PQRs] PQRs .....</i>	<i>15</i>

## I. INTRODUCTION

The U.S. Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES) Program and Permit Quality Reviews (PQRs) are an evaluation of an NPDES permitting authority's permits and permitting practices. EPA undertakes this evaluation to determine whether permits are developed in a manner consistent with applicable requirements in the Clean Water Act (CWA) and federal regulations that apply to the NPDES program. PQRs also consider EPA guidance, policies, and other best practices. Through this oversight mechanism, EPA promotes national consistency, recognizes successes in NPDES program implementation, and identifies opportunities for improvement in the development of NPDES permits. PQRs are conducted under EPA's state program oversight and information collection authority on a cycle of approximately five years. The current cycle is fiscal years 2024-2028.

The PQRs are conducted following EPA's national [NPDES PQR Toolkit](#), a set of standardized tools.<sup>1</sup> PQRs consist of two main components: 1) state program information and 2) permit reviews. State program information is gathered from discussions between EPA and the state permitting authority on program operational status, such as the permitting process, responsibilities, organization, staffing, and program challenges. Permit reviews examine selected permits for consistency with regulatory requirements of the NPDES program as well as regional priority area(s) selected by the Region that target specific permit types or particular aspects of permits. A comprehensive overview on how PQRs are conducted, along with the background and regulatory basis for permit review elements, can be found in the supporting *PQR Reference Document* (PQR Toolkit Attachment A).

Specifically, permit reviews evaluate the permit application, permit, fact sheet, and any correspondence, reports, or files that document the basis for the development of permit conditions and related administrative process, such as the public notice. Finally, PQRs identify strengths and areas for improvement based on the information provided and the permits reviewed. To address areas for program improvement, the PQR identifies action items, which are divided into two categories to distinguish the priority that should be placed on each item.

- **Essential Action Items:** Address inconsistencies with a federal regulation, which EPA cites for each essential action item.
- **Recommended Action Items:** Make recommendations based on guidance, policies, or other best practices.

Essential action items are tracked by EPA Headquarters on an annual basis, and essential and recommended action items are reviewed during subsequent PQRs.

During the current PQR, EPA's review team conducted a review of the *[State]* NPDES permitting program. The PQR included a *[n] [on-site or virtual]* visit with the *[State Environmental Department]* on *[Date(s)]*.

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<sup>1</sup> <https://www.epa.gov/npdes/npdes-program-and-permit-quality-review-toolkit>

Overall, the PQR for *[State]* found that *[Note particularly satisfactory/effective elements of the state's permitting practices and permits reviewed]*. However, the PQR also found that *[Note any significant areas for improvement]*. The PQR also notes *[Note any process issues and any factors that may be contributing to the problems]*.

The state of *[State]* reviewed and provided comments on the draft PQR report on *[Date]*, and committed to address many of the action items. *[May describe activities that are already underway to address any of the action items.]*

## II. STATE PROGRAM INFORMATION

### A. Program Background

PQRs for the state of *[State]* were previously conducted in *[Year(s) of review, not publication]*. These reports, which can be found on the EPA [NPDES PQR Reports](#) website,<sup>2</sup> historically included a comprehensive overview of the state's NPDES program, including a description of the permitting authority (structure, responsibilities, locations, and staffing levels), standard operating procedures for workflow management, data systems used to support permitting, permit and fact sheet tools and templates, the permit quality assurance/quality control processes, and how permit files are managed.

For the current PQR, the program background primarily discusses any changes to the state's NPDES program practices since the last PQR was conducted, as well as any permitting initiatives or challenges to implementing the permitting program.

*[Describe any changes made to the program since the previous PQR, such as new SOPs, revised tools or templates, or noteworthy changes to the program organization or structure.]*

*[Describe new state initiatives to improve permitting since the previous PQR. This information can be found in the responses to the PQR Questionnaire. In addition, the Region may have knowledge of relevant initiatives due to general program oversight and support. Highlights could include any efforts the state is undertaking to improve permitting efficiency, streamlining, timeliness, and prioritization.]*

*[Describe any new state policies, processes, resource, or other challenges that may affect permitting, but which were not evident from reviewing permits. This information can be found in the responses to the PQR Questionnaire. Also discuss whether any challenges that were identified in the previous PQR cycle have been addressed.]*

### B. Permit Universe

As of *[Date]*, *[State]* is responsible for administering permit coverage for approximately *[xx]* individual permits, including *[xx]* major permits (*[xx]* POTWs and *[xx]* non-POTWs) and *[xx]* non-

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<sup>2</sup> <https://www.epa.gov/npdes/regional-and-state-npdes-program-and-permit-quality-review-pqr-reports>

major individual permits ([xx] POTWs and [xx] non-POTWs). *[Data may also be presented in table format, or copied from the PQR Questionnaire.]*

In addition, [State] administers [xx] general permits (GPs), covering approximately [xx] dischargers. *[Insert table or further discuss how many permittees are covered by each state-issued GP.]*

[State] reported that as of [Date], approximately [xx] percent of individual permits are administratively continued, and [xx] percent of individual permits are backlogged (i.e., have been administratively continued for 6 months or longer). Additionally, [xx] percent of GPs, which cover approximately [xx] percent of General Permit Covered Facilities (GPCFs), are administratively continued and [xx] percent of GPCFs are backlogged. *[Insert discussion of backlog, such as factors that may be contributing to the backlog, whether or not the backlog has been improving, and if the state is implementing any processes to reduce the backlog].*

According to [State], significant industries in the state include [List industries]. *[Insert discussion of how industries are identified in the PQR Questionnaire as significant (e.g., industries that are contributing significant discharge to waters of the US, are particularly challenging to permit, or take up significant permitting resources)].*

### III. PQR FINDINGS

A total of [Total number of permits reviewed] permits, consisting of [xx] individual and [xx] general permits, were reviewed during this PQR. Of these, [Number of core review permits] permits were reviewed for the core review and [Number of regional topic review permits] permits were reviewed for regional topic(s). Some permits underwent both a core review and one or more Regional topic reviews. Permits were selected based on issuance date and the review categories that they fulfilled. *[Optional: include table of permits selected for review, identifying which areas (core, Regional) each permit was reviewed for. This can be adapted from the table in Appendix 1 (if used) of the PQR SOPs from the PQR Toolkit.]*

#### A. Core Review

##### *Background*

The core review evaluates selected permits and supporting materials using standard PQR tools that are intended to evaluate similar issues and types of permits in all states. The review is supplemented with discussion of the permit development process with the state's permit writers. This section of the report provides EPA's assessment of each of the following NPDES core elements:

**1. Basic Facility Information and Permit Application:** Fact sheets must identify certain information about the facility such as descriptions of the type of facility or the permitted activity and, when appropriate, location of the outfall(s). Permits, which authorize the

discharge of pollutants from a point source to a water of the U.S., shall be effective for not more than five years. Additionally, permit applications must meet certain minimum information requirements.

**2. Effluent Limitations (including TBELs, RP and WQBELs, and determination of final effluent limitations):** Permits must contain appropriate technology-based effluent limitations (TBELs), which represent the minimum level of control that must be imposed in a permit. Also, where necessary, permits must contain water quality-based effluent limitations (WQBELs), which are requirements in addition to or more stringent than technology-based requirements to achieve state water quality standards (WQS). To establish whether WQBELs are necessary, the permitting authority evaluates whether any pollutants or pollutant parameters are or may be discharged at a level that will cause, have the reasonable potential (RP) to cause, or contribute to an excursion above any applicable state WQS. Additionally, final effluent limitations must be consistent with anti-backsliding and antidegradation provisions.

**3. Monitoring and Reporting Requirements:** Permits must establish monitoring requirements to monitor compliance with permit limits and report the results to the permitting authority. Permits must specify monitoring type, intervals, and frequency sufficient to yield data representative of the monitored activity; specify monitoring locations; require the use of sufficiently sensitive methods; and require electronic reporting.

**4. Standard and Special Conditions:** Permits must contain certain “standard” permit conditions such as definitions, testing procedures, records retention, notification requirements, and penalties for noncompliance. Additional standard conditions are required for certain categories of dischargers. Permits may also contain discharger-specific “special” conditions such as requirements for additional studies, best management practices, compliance schedules, or conditions specific to municipal facilities, such as pretreatment program requirements.

**5. Administrative Process:** The administrative process includes coordinating EPA and state review of the draft (or proposed) permit, providing public notice, conducting hearings (if appropriate), responding to EPA and public comments, and modifying a permit (if appropriate) after issuance.

**6. Documentation:** The fact sheet and administrative record (if applicable) contain the documentation necessary to justify permit conditions. Overall, the fact sheet must describe the type of facility or activity permitted and the nature of its discharge, the basis (including any calculations) for all permit limits and conditions, and procedures for issuing the final permit. Generally, an administrative record includes all additional files relevant to the development of the permit, such as the permit application, previous permit, draft permit, fact sheet and all items cited in the fact sheet, copy of the public notice, comments received, response to comments, and correspondence between the applicant and regulatory personnel.

For additional background information on elements of the core review, see the supporting PQR Reference Document (PQR Toolkit Attachment A).

### Summary of Core Review Elements

*[This section is not intended to be a comprehensive description of the permitting authority's complete permitting practices; rather, it should serve as a method to directly communicate specific strengths and areas for improvement.]*

*[Using notes from the PQR Questionnaire and Core Review Checklists, discuss particularly satisfactory/effective elements of the state's permitting practices and permits reviewed, as well as specific elements to strengthen. Consider whether any strengths/areas for improvement can be identified from the following core elements (and any other initiatives, as applicable):*

- *Basic Facility Information and Permit Application*
- *Effluent Limitations (including TBELs, RP and WQBELs, and determination of final effluent limitations)*
- *Monitoring and Reporting Requirements*
- *Standard and Special Conditions*
- *Administrative Process*
- *Documentation*

*PQR authors may use discretion on how to organize this section, based on the complexity of the findings (e.g., organized by core element or by strengths/areas for improvement). When citing specific regulations, include a link to the appropriate [eCFR.gov](#) reference.]*

*Table 1. Core Review Essential Action Items*

*[Action items may be identified from permit reviews, the PQR Questionnaire, or discussions with the state.]*

*[If there are no action items for a particular program area, the corresponding row can be deleted. Add rows to program areas as needed.]*

*[For essential action items, the item title must include an appropriate regulatory citation with a link to the appropriate [eCFR.gov](#) reference. For the basis for the action item, summarize the information obtained during the review that supports the action item. At the discretion of the Region or state, the basis may also include a specific permit number or citation to state regulations, policies, or SOPs. Examples for different program areas are provided as a guide to help develop quality essential action items.]*

Program Area	Action Item Title	Basis for Action Item
Facility Information	<i>Example: Fact sheets must, when appropriate, include a sketch or detailed description of the location of each discharge or regulated activity described in the application (<a href="#">40 CFR 124.56(c)</a>).</i>	<i>Example: Fact sheets for permits [XX000000] and [XX000001] did not contain any details describing the outfall locations for the facilities.</i>

Program Area	Action Item Title	Basis for Action Item
Permit Application Requirements	<i>Example: Applications must include all data required by EPA regulations at <u>40 CFR 122.21</u>.</i>	<i>Example: The applications for two permits lacked pollutant testing data from EPA Form 2A, Part D for pollutants X and Y.</i>
TBELs	<i>Example: TBELs for non-POTWs must be expressed as both monthly average and maximum daily effluent limitations in permits, unless impracticable (<u>40 CFR 122.45(d)</u>).</i>	<i>Example: Permits [XX000000] and [XX000001] did not consistently express TBELs as both monthly average and maximum daily limitations. TBELs were expressed as either a monthly average or a maximum daily limitation but not both.</i>
RP and WQBELs	<i>Example: Permits must include WQBELs when reasonable potential has been demonstrated and TBELs are insufficient to meet the WQS, per <u>40 CFR 122.44(d)(1)(i)</u>.</i>	<i>Example: One permit included monitoring but no permit limits for mercury or nitrogen, even though RP was demonstrated for both parameters.</i>
Determination of Final Effluent Limitations	<i>Example: Ensure that permit writers conduct and document an anti-backsliding analysis where proposed effluent limitations are less stringent than limitations from the previous permit (<u>40 CFR 122.44(l)</u>, <u>40 CFR 124.8</u>).</i>	<i>Example: Limitations for pollutant X in permit [XX000000] and pollutant Y in permit [XX000001] were less stringent than in the previous permits. The record does not indicate that an anti-backsliding analysis was conducted, and the fact sheet did not provide a rationale for the less stringent limits.</i>
Monitoring and Reporting	<i>Example: Permits must require the use of sufficiently sensitive EPA-approved analytical methods in accordance with <u>40 CFR 122.44(i)(1)(iv)</u> and <u>40 CFR 136.1(c)</u>.</i>	<i>Example: All permits reviewed did not specify the use of sufficiently sensitive methods for analytical monitoring requirements.</i>
Standard and Special Conditions	<i>Example: Ensure that all federal standard conditions in <u>40 CFR 122.41</u> and <u>40 CFR 122.42</u> are included in all NPDES permits.</i>	<i>Example: Three of the industrial permits reviewed did not include standard conditions at <u>40 CFR 122.42(a)(1)–(2)</u> regarding notification levels.</i>



Program Area	Action Item Title	Basis for Action Item
Administrative Process	<i>Example: Ensure that all public notices contain the information required by <u>40 CFR 124.10(d)(1)</u>.</i>	<i>Example: For permits [XX000000], [XX000001], and [XX000002], the public notice did not contain a description of the business conducted at the facility or activity described in the permit or application, and public notices for all permits did not include procedures to request a hearing.</i>
Documentation	<i>Example: Ensure fact sheets include calculations or other necessary explanation of the derivation of specific effluent limitations, consistent with <u>40 CFR 124.56</u>.</i>	<i>Example: Fact sheets for all industrial permits reviewed did not include any necessary production information, raw material usage, or flow rates needed to calculate the effluent limitations based on the ELGs. For all permits reviewed, RP and WQBEL calculations were available in the administrative record but not included in the fact sheet.</i>

*Table 2. Core Review Recommended Action Items*

*[Action items may be identified from permit reviews, the PQR Questionnaire, or discussions with the state.]*

*[If there are no action items for a particular program area, the corresponding program area row can be deleted. Add rows to program areas as needed.]*

*[For recommended action items, the item title should include a reference for the recommendation, such as a citation to guidance, if applicable. Recommended action items may also be based on common practices observed by EPA. For the basis for the action item, summarize the information obtained during the review that supports the action item. At the discretion of the Region or state, the basis may also include a specific permit number or citation to state regulations, policies, or SOPs. Examples for different program areas are provided.]*

Program Area	Action Item Title	Basis for Action Item
Facility Information	<i>Example: Consider specifically identifying the physical location of outfalls, including the latitude and longitude coordinates, in the permit or fact sheet.</i>	<i>Example: Permits and fact sheets did not identify the physical location of outfalls.</i>

Program Area	Action Item Title	Basis for Action Item
Permit Application Requirements	<i>Example: EPA recommends that the permit writer requests updated data for outdated applications.</i>	<i>Example: Permits [XX000000] and [XX000001] were backlogged prior to reissuance, and their applications were seven or more years old. Some pollutants were evaluated using recent DMR data, though several pollutants were evaluated based only on outdated application data.</i>
TBELs	<i>Example: Consider adding mass-based limits for secondary treatment standards, based on the POTW's design flow (see EPA's <u>NPDES Permit Writers' Manual</u> section 5.1.3.2).</i>	<i>Example: All POTW permits included only concentration-based limits for the secondary treatment standards.</i>
RP and WQBELs	<i>Example: When evaluating RP, consider using the maximum reported effluent concentration, recommended by EPA's 1991 <u>TSD</u>, rather than using the geometric mean effluent value.</i>	<i>Example: The state's implementation policy for reasonable potential uses the geometric mean effluent value for RP calculations, which is less conservative than the maximum value and may be less protective.</i>
Determination of Final Effluent Limitations	<i>Example: Consider developing SOPs, implementation procedures, or template language to ensure consistent evaluation of antidegradation in applicable permits.</i>	<i>Example: The fact sheets for four permits included an antidegradation review, but the quality of the review varied from permit to permit. In the opening interview/response to the PQR Questionnaire, the state indicated that it does not have specific guidance for permit writers to implement the state's antidegradation policies.</i>
Monitoring and Reporting	<i>Example: EPA recommends that the BOD<sub>5</sub> and TSS percent removal monitoring requirements should be incorporated directly into the permit limits and monitoring table.</i>	<i>Example: For all POTW permits reviewed, monitoring for percent removal was only included under narrative permit conditions instead of in the primary limits and monitoring table.</i>

Program Area	Action Item Title	Basis for Action Item
Standard and Special Conditions	<i>Example: EPA recommends that the applicable <u>40 CFR 122.42</u> standard condition be listed expressly in the permit.</i>	<i>Example: All permits reviewed included the standard conditions at 40 CFR 122.41 explicitly, but only included the conditions at 40 CFR 122.42 by reference.</i>
Administrative Process	<i>Example: If no public comments were received, consider adding a note to the permit record that no comments were received, so it is transparent that the public participation process was completed.</i>	<i>Example: Three permits reviewed did not include any public comments or response to comments in the permit record. It was not clear if no comments were received, or if these materials were missing from the record.</i>
Documentation	<i>Example: EPA recommends that the fact sheet provide a rationale for requiring a pretreatment program, including a brief summary of the pretreatment program's history.</i>	<i>Example: Two POTW permits [XX000000] and [XX000001] required development and/or implementation of a pretreatment program. The fact sheets would benefit from a discussion of why a pretreatment program is necessary for these facilities.</i>

## B. Regional Topic Review

Regional topic reviews target specific permit types or issues of particular interest to the EPA Region. The regional topic[s] selected by EPA Region *[Insert Region number]* for *[State]* were: *[Insert regional topic(s)]*.

*[Since specific Regional Topics are not addressed in the standardized PQR tools, and these topics may not have been reviewed in previous PQRs, the write-up for this section should be more comprehensive than the Core Review section to ensure appropriate background information and detailed description of the state's permitting practices/permits is provided.]*

### 1. *[Insert Regional Topic Title]*

#### **Background**

*[Provide background information on the topic area, describing any applicable regulations, statutes, policies, or guidance related to the topic. This would be similar to descriptions in the PQR Reference Document that describe the basis for elements discussed under “State Program Information” and “Core Review” sections of the PQR. When citing specific regulations, include a link to the appropriate [eCFR.gov](#) reference.]*

### **Summary of [Insert Regional Topic Title] Review**

*[Describe actions that the state undertakes on issues associated with this topic in its NPDES permitting program. Additionally, describe how permits reviewed address this topic.]*

*[Discuss particularly satisfactory/effective elements of the state’s permitting practices and permits reviewed, as well as specific elements to strengthen, as they relate to this topic. When citing specific regulations, include a link to the appropriate [eCFR.gov](#) reference.]*

### **Table 3. [Insert Regional Topic] Action Items**

*[Action items may be identified from permit reviews, the PQR Questionnaire, or discussions with the state.]*

*[For essential action items, the item title must include an appropriate regulatory citation which links to the appropriate [eCFR.gov](#) reference. For recommended action items, the item title should include a reference for the recommendation, such as a citation to guidance, if applicable. Recommended action items may also be based on common practices observed by EPA. For the basis for the action item, summarize the information obtained during the review that supports the action item. At the discretion of the Region or state, the basis may also include a specific permit number or citation to state regulations, policies, or SOPs.]*

Action Item Type	Action Item Title	Basis for Action Item
Essential		
Recommended		

## IV. ACTION ITEMS SUMMARY AND STATUS

This section lists the essential and recommended action items from the current PQR and the previous PQR[s] conducted in [Year(s) of previous PQR(s)]. This section also summarizes the state's efforts to address the action items identified during the previous PQR[s], and if applicable, any initial steps taken to resolve items identified in the current PQR. These combined lists allow EPA and [State] to track progress, identify long-term trends, and plan performance discussions.

*[For action items identified from a previous PQR, this table can be populated from the Action Item Review Forms (Attachment E from PQR Toolkit), if completed with the state during the PQR process. If a Region has established another essential action item tracking method that contains all the information suggested in this table, Regions may use that chart in lieu of this chart.]*

*For "PQR Year(s)", indicate the PQR in which the action item was identified. "PQR Year(s)" are considered to be the year the PQR was conducted rather than the year the report was published. Two or more years may be listed to indicate the same item has been identified in multiple PQRs.*

*Select the appropriate option from the "choose an item" dropdown list. Choose "New Action Item" if it was an item identified during the current PQR. For new action items, a status update is not necessary, but may be provided if the state has indicated initial steps to resolve the item during their review of the draft report.]*

Table 4. Essential Action Items Identified During the [Insert Year(s) of Current and Previous PQRs] PQRs

Program Area	Action Item Title	PQR Year(s) [Year Conducted]	Status Update
			( 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</i>

Program Area	Action Item Title	PQR Year(s) <i>[Year Conducted]</i>	Status Update
			<i>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>
			<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>

Table 5. Recommended Action Items Identified During the [Insert Year(s) of Current and Previous PQRs] PQRs

Program Area	Action Item Title	PQR Year (Year Conducted)	Status Update
			( 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.]
			( 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.]
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Program Area	Action Item Title	PQR Year (Year Conducted)	Status Update
			( 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>
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			( 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>