

FISCAL YEAR	AGENCY NAME	AGENCY ACRONYM
2027	United States Environmental Protection Agency	EPA



EVIDENCE PLAN



THE ADMINISTRATOR

WASHINGTON, D.C. 20460

October 5, 2026

At the U.S. Environmental Protection Agency, we are proving every single day that Americans don't have to choose between a strong economy and a clean environment. We can grow the economy, bring down costs for American families, and protect human health and the environment, all at the same time. That is exactly what we are doing.

Under President Trump's leadership, EPA remains laser-focused on our core mission while delivering on the five pillars of our Powering the Great American Comeback initiative: providing clean air, land, and water for every American; restoring American energy dominance; advancing permitting reform, cooperative federalism, and cross-agency partnership; making America the super intelligence capital of the world; and bringing back and protecting American auto jobs. EPA's Fiscal Year (FY) 2026–2030 Strategic Plan is our roadmap for turning that vision into results.

This plan lays out how EPA will protect human health and the environment across our great nation through commonsense policies that deliver clean air, land, and water for all Americans while unleashing American energy, revitalizing domestic manufacturing, lowering the cost of living, and fueling American innovation and entrepreneurship. Its five strategic goals are supported by 14 strategic objectives, each with clear implementation strategies. Together, they define the historic work this agency will accomplish during the Trump Administration.

Alongside the Strategic Plan, EPA is releasing its FY 2027 Evidence Plan, as required by the Foundations for Evidence-Based Policymaking Act of 2018. The Evidence Plan includes the agency's FY 2026–2030 Learning Agenda, which sets out the key questions we need to answer in priority areas across our mission, along with our plans for evidence-building and evaluation in the coming fiscal year. This work will focus on three areas: getting better results from EPA's grant programs, reforming and speeding up our permitting processes, and developing super intelligence capabilities that make the agency run more efficiently. The result will be stronger stewardship of taxpayer dollars, faster and more predictable permitting in partnership with our state, Tribal, and local co-regulators, and strategic decisions grounded in data that get the most out of every automation investment.

The FY 2026–2030 Strategic Plan fulfills EPA's statutory obligations under Section 3 of the Government Performance and Results Act (GPRA) of 1993, as updated by Section 2 of the GPRA Modernization Act of 2010. The FY 2027 Evidence Plan fulfills our obligations under Title I, Section 312(a) and (b) of the Foundations for Evidence-Based Policymaking Act of 2018 (5 U.S.C. § 312). Together, these plans ensure that EPA's decisions are driven by data and evidence as we continue delivering environmental wins for the American people.

EPA will keep working every day to protect America's air, land, and water within the bounds of the laws Congress wrote. I am proud of the work this team is doing, and I look forward to continuing to partner with you as we Power the Great American Comeback.

Sincerely,

Lee Zeldin
Administrator

SECTION I | EVIDENCE PLAN SUMMARY

This section provides a snapshot of the agency's Priority Questions, evidence activities to answer them, and the alignment of each Priority Question to relevant Administration priorities.

PRIORITY QUESTION	KEY EVIDENCE ACTIVITY(IES)	RELATED ADMINISTRATION PRIORITY(IES)
1 To answer the overarching Learning Agenda priority question, <i>"To what extent are EPA grant programs most effectively advancing the Agency mission of protecting human health and the environment, while being good stewards of tax dollars?"</i>, EPA will focus on answering the following question in FY27: To what extent are priority EPA grant programs that were among those allocated the highest levels of FY26 funding (a) achieving environmental and human health outcomes and (b) being good stewards of tax dollars, as defined by evidence-building work conducted in FY26?	- Refine the metrics for measuring effectiveness of the candidate grant programs for analysis. - Refine analytic methods and identify possible challenges, including potential gaps in the current information available, for evaluating EPA grant programs. - Collect additional data and conduct analysis to pilot methods and metrics for at least one EPA grant program.	- Strategic Plan Goal 1: Provide Clean Air, Land, and Water for Every American - Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership - Objective 3.2 Cooperative Federalism: Work Effectively with State, Tribal, Local, Federal, Congressional, and International Partners. - Executive Order 14332: Improving Oversight of Federal Grantmaking
2 To answer the overarching Learning Agenda priority question, <i>"What innovative strategies, initiatives, partnerships, and reforms will be most effective in streamlining EPA's processes to reduce the (i) time, (ii) uncertainty, and (iii) costs involved in issuing a permit?"</i>, EPA will focus on answering the following in FY27: Based on the information gathered and assessed in FY26, which permitting improvements merit further exploration, testing, evaluation, and/or broader implementation?	- Document Review - Interviews with Subject Matter Experts - EPA Internal Steering Committee Review	- Strategic Plan Goal 1: Provide Clean Air, Land, and Water for Every American - Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership - Objective 3.1 Incentivized Investment: Use Innovative Strategies to Reform and Streamline Permitting and other Public-Facing Operations - Presidential Memoranda: Updating Permitting Technology for the 21st Century

3	To answer the overarching Learning Agenda priority question, <i>“How can EPA leverage automation and Super Intelligence (SI) to enhance operational efficiencies and support the Agency mission?”</i> EPA will focus on answering the following in FY27: Which automation aspects of the Clean Air Act Permitting System (CAAPS) has EPA applied to the National Pollution Discharge Elimination System (NPDES) permit program workflow and vice versa?	▪ Identify the common requirements between the CAAPS and NPDES permit program related to data collection, review workflows, coordination, publishing, and other relevant areas. ▪ Identify the currently automated aspects of CAAPS and NPDES permit program workflow.	▪ Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership ○ Objective 3.1 Incentivized Investment: Use Innovative Strategies to Reform and Streamline Permitting and other Public-Facing Operations ▪ Strategic Plan Goal 4: Develop Super Intelligence Capabilities ○ Objective 4.2 Efficient Systems: Leverage SI to Improve EPA Processes and Capabilities ▪ Presidential Memoranda: Updating Permitting Technology for the 21st Century
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SECTION II | EVIDENCE ACTIVITIES

This section details the key evidence activities being undertaken to answer the agency's Priority Questions, including evaluations. Evaluation, as defined under requirements of the Foundations for Evidence-Based Policymaking Act of 2018, is an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.

Activity	A	Refine the metrics for measuring effectiveness of the candidate grant programs for analysis				
Supports Priority Question(s)...		1	2	3	4	5
		x	☐	☐	☐	☐
Description	Building on FY26 efforts to identify and define potential metrics for measuring grant programs' effectiveness (e.g., percentage of an award used to fund activities tied to specific environmental and human health outcomes; return on investment; and the long-term sustainability of funded projects post-EPA award), this evidence-building activity will investigate how to operationalize these metrics. For instance, how can the metrics be applied and evaluated for different types of grant programs? EPA will identify the extent to which metric operationalization varies by type of grant program or in what circumstances some metrics may be more relevant than others. For instance, when are cumulative, versus incremental, investments the more relevant metric in relation to an outcome of interest? EPA will also consider how program offices envision programmatic success as an important input into this evidence-building activity. The goal of this exercise will be to develop a set of standardized metrics that can be used, as applicable, to assess EPA's grant programs to ensure EPA is advancing its mission while being good stewards of U.S. tax dollars. In addition, EPA will leverage FY26 outreach efforts to collect more detailed information on the structure and goals of candidate EPA grant programs and what data are available for evaluating identified metrics. EPA will then refine its list of candidate grant programs, as needed, based on criteria that include but are not limited to: availability of relevant information collected by EPA or outside entities; data that are sufficiently granular on recipients and/or recipient location characteristics to construct the identified metrics; and availability of data of sufficient quality (i.e., meet EPA data quality standards) to develop and measure applicable metrics and methods. In instances with identifiable challenges to evaluation, it will be important to determine how the priority question can be answered when only certain aspects of a grant program can be evaluated even if the program as a whole cannot be. This activity is expected to be completed within 12 months, barring any unanticipated challenges.					
Alignment to Priority(ies)	This activity aligns with EPA's 2026-2030 Strategic Plan Goal 1: Provide Clean Air, Land, and Water for Every American and Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership, specifically Objective 3.2 Cooperative Federalism: Work Effectively with State, Tribal, Local, Federal, Congressional, and International Partners. Every year, EPA awards approximately \$4 billion in funding for grants and other assistance agreements. EPA wants to better understand how this funding supports the achievement of environmental and human health outcomes and wants to collect information on and evaluate the stewardship of these federal dollars.					
Topics	Cooperative Federalism; Clean Air, Land, and Water; Grants Oversight					

Activity	B	Refine analytic methods and review possible challenges, including potential gaps in the current information available, for evaluating grant programs				
Supports Priority Question(s)...		1	2	3	4	5
		x	☐	☐	☐	☐

Description	This evidence-building activity will build on an FY26 literature review and discussion with relevant experts at EPA and other entities to identify methods that can be used to evaluate human health and environmental outcomes and stewardship of tax dollars for grant programs. Based on results of the literature review and discussion with relevant experts, EPA will develop a conceptual framework/criteria to refine identified methods. The framework will document and describe key aspects of the methodology for evaluating EPA grant programs' outcomes, as well as evaluate under what circumstances each identified method may apply. Another goal of this activity is to identify potential conceptual challenges and, when available, possible solutions, for evaluating the health and environmental outcomes and stewardship of tax dollars for EPA grant programs. This includes how to evaluate the counterfactual (i.e., what would have occurred absent EPA funding), as well as ways to evaluate interim goals for grant programs that fund capacity-building (e.g., training of regional staff to enable more effective outreach or inspection activity) or have greater degrees of heterogeneity in funded activities. It will also be important to understand how evaluation may change in instances where grant programs are administered by the states, territories or Tribes and/or Federal funding is leveraged with other funding sources. Another important conceptual issue is how to tie the initial investment to an outcome of interest when there is a considerable lag between them (which can occur when investments seek to change specific human health outcomes in the future), and the limitations of what conclusions may be drawn in those instances. This activity is expected to be completed within 12 months, barring any unanticipated challenges.
Alignment to Priority(ies)	This activity aligns with EPA's 2026-2030 Strategic Plan Goal 1: Provide Clean Air, Land, and Water for Every American and Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership, specifically Objective 3.2 Cooperative Federalism: Work Effectively with State, Tribal, Local, Federal, Congressional, and International Partners. Every year, EPA awards approximately \$4 billion in funding for grants and other assistance agreements. EPA wants to better understand how this funding supports the achievement of environmental and human health outcomes and wants to collect information on and evaluate the stewardship of these federal dollars.
Topics	Cooperative Federalism; Clean Air, Land, and Water; Grants Oversight

Activity	C	Evaluation	Collect additional data and conduct analysis to pilot methods and metrics for at least one EPA grant program				
Supports Priority Question(s)...		1	2	3	4	5	
		x	☐	☐	☐	☐	
Evaluation Question(s)		1) To what extent is the pilot grant program selected (a) achieving their planned environmental and human health outcomes and (b) being good stewards of U.S. tax dollars? 2) To what extent can methodologies used to evaluate the selected pilot grant program be applied to other grant programs?					
Description		Based on an FY26 literature review to identify previous evaluation efforts for the specific grant program, EPA will host a series of focus groups with EPA program office staff and/or relevant stakeholders and partners (e.g., states, territories, local governments and Tribes), as needed, such as award recipients or affected industries to collect and prepare relevant program and outcome data; collect information on award criteria and characteristics; and collect data from outside sources, as needed for at least one EPA grant program. Note that EPA has an approved generic ICR for focus groups that can be used to support this work, as needed. EPA will develop an analysis plan, including identifying which of the refined metrics (see Activity A) and analytic approaches that are most relevant and applicable for a specific grant program and how EPA intends to measure these metrics given the available data. EPA will then conduct an initial evaluation, working with additional subject matter experts, stakeholders, and partners (e.g., states, territories, local governments, and Tribes), as needed, to pilot the methods and metrics already identified within the context of at least one specific grant program. This evaluation is expected to be completed within 12 months, barring any unanticipated challenges.					

Alignment to Priority(ies)	This activity aligns with EPA's 2026-2030 Strategic Plan Goal 1: Provide Clean Air, Land, and Water for Every American and Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership, specifically Objective 3.2 Cooperative Federalism: Work Effectively with State, Tribal, Local, Federal, Congressional, and International Partners. Every year, EPA awards approximately \$4 billion in funding for grants and other assistance agreements. EPA wants to better understand how this funding supports the achievement of environmental and human health outcomes and wants to collect information on and evaluate the stewardship of these federal dollars.
Collection / Acquisition	Focus groups, desk review, subject matter interviews
Topics	Cooperative Federalism; Clean Air, Land, and Water; Grants Oversight

Activity	D	Information Review				
Supports Priority Question(s)...		1	2	3	4	5
		☐	☒	☐	☐	☐
Description		In FY 2027, EPA will review the information collected in FY 2026 to identify and prioritize permitting improvements that warrant further exploration, testing, and evaluation, and hold the potential for broader implementation. Sources of this information include, but are not limited to EPA's permitting programs, other Federal agencies, Tribes, territories, state and local permitting authorities, partner organizations, private entities, and the literature review conducted in FY2026. The scope of information to be reviewed encompasses fully implemented improvements as well as improvements in progress as EPA and other permitting authorities continue to "learn while doing." As part of this review, EPA will also explore integrating initial criteria for assessment – cost, time, and uncertainty – into a framework of more specific performance metrics that could include, for example, permit processing times, variability in review timelines, permit backlogs, frequency of requests for additional information, stakeholder satisfaction, compliance outcomes, and measures of environmental performance following permit issuance. EPA's commitment to cooperative federalism and stakeholder engagement will also be reflected in considering, for example, whether permitting reforms improve transparency, communication, and opportunities for engagement. EPA will engage Tribal partners through various venues, including the E-Enterprise Leadership Council which includes state partners, along with other permitting authorities, Federal partners, and community and other stakeholders in refining this framework for review. Any engagement with external stakeholders and partners will be completed within the parameters of the Paperwork Reduction Act (1980, 1995). EPA anticipates completing its review of the information collected within 12 months, barring any unanticipated challenges. EPA recognizes that not all promising practices can be fully assessed through document review alone, so the information review will be complemented by interviews and both internal and external engagement opportunities.				
Alignment to Priority(ies)		This activity aligns with EPA's 2026-2030 Strategic Plan Goal 1: Provide Clean Air, Land, and Water for Every American, and Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership. By investigating and identifying potential permitting process improvements and innovations, EPA hopes to enhance permitting efficiency, foster cooperative federalism, and strengthen cross-agency partnerships to achieve environmental goals more collaboratively and effectively.				
Topics		Permitting Process Evaluation, Permitting Technology and Innovation, Permitting Process Improvement				

Activity	E	Interviews with Subject Matter Experts				
Supports Priority Question(s)...		1	2	3	4	5
		☐	☒	☐	☐	☐
Description		Conducting interviews with key individuals involved in or affected by permitting improvements will play a				

	crucial role in gathering supplemental information that enhances the data obtained through internal information collection conducted in FY 2026. Such individuals may be drawn from EPA permitting program staff, Tribes, territories, state and local permitting authorities, other Federal agencies, permit applicants, community representatives and others who may have analyzed permitting improvement efforts (e.g., academics, consultants, etc.). These interviews are designed to delve deeper into the nuances of permitting processes, capturing insights that may not be fully reflected in existing data. By engaging with a diverse range of players, the interviews aim to provide a more comprehensive understanding of the challenges and opportunities within the permitting landscape. The perspectives gained from these discussions can reveal underlying issues, innovative solutions, and practical experiences that enrich the overall analysis. This qualitative data will complement internal information collection efforts, ensuring a well-rounded assessment. Any engagement with external stakeholders and partners will be completed within the parameters of the Paperwork Reduction Act (1980, 1995). EPA anticipates the interviews will be completed within 12 months, barring any unanticipated challenges. The varied Information gained from these diverse interviews will contribute evidence needed to support the prioritization of permit improvements that require or warrant further exploration, testing, evaluation and/or broader implementation.
Alignment to Priority(ies)	This activity aligns with EPA's 2026-2030 Strategic Plan Goal 1: Provide Clean Air, Land, and Water for Every American, and Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership. By investigating and identifying potential permitting process improvements and innovations, EPA hopes to enhance permitting efficiency, foster cooperative federalism, and strengthen cross-agency partnerships to achieve environmental goals more collaboratively and effectively.
Topics	Permitting Process Evaluation, Permitting Technology and Innovation, Permitting Process Improvement

Activity	F	EPA Internal Steering Committee Review				
Supports Priority Question(s)...		1	2	3	4	5
		☐	☒	☐	☐	☐
Description		The internal EPA Steering Committee, comprised of senior leaders and experts from EPA's various permitting programs, will convene periodically throughout FY 2027 to review and provide direction as needed to the information review, interviews, and broader stakeholder engagement activities previously described. The Steering Committee will play a critical role in helping to synthesize the learning from those activities, determine interim products it would be useful to create and share with partners, stakeholders, and the public, and set priorities for FY 2028 and FY 2029 of this Learning Agenda. Over the next 12 months, the EPA Internal Steering Committee will consider the evidence needed to further narrow down the permit improvements that require or warrant further exploration, testing, evaluation, and /or broader implementation.				
Alignment to Priority(ies)		This activity aligns with EPA's 2026-2030 Strategic Plan Goal 1: Provide Clean Air, Land, and Water for Every American, and Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership. By investigating and identifying potential permitting process improvements and innovations, EPA hopes to enhance permitting efficiency, foster cooperative federalism, and strengthen cross-agency partnerships to achieve environmental goals more collaboratively and effectively.				
Topics		Streamlined Permitting, Permitting Technology and Innovation, Permitting Process Improvement				

Activity	G	Identify the common requirements between the CAAPS and the NPDES permit program related to data collection, review workflows, coordination, publishing, and other relevant areas				
Supports Priority Question(s)...		1	2	3	4	5
		☐	☐	☒	☐	☐
Description		Examining the permitting processes related to the Clean Air Act Title V, Clean Air Act New Source Review, and the Clean Water Act National Pollutant Discharge Elimination System, this evidence-building				

	activity aims to identify the common requirements reflected in the Clean Air Act permitting program and various processes in the EPA-issued NPDES permit program related to application receipt and data collection, review workflows and timelines, coordination, publishing, and public inspection and comment, as required, and other relevant areas. The insights gained from this activity will guide EPA in making decisions about integrating shared automation features or developing new ones that can be applied across both systems. By leveraging common requirements, the agency can enhance operational efficiencies and ensure consistency in the federal permitting processes that utilize the CAAPS and the NPDES permit program, thereby supporting its mission to protect human health and the environment. To facilitate this activity, the agency will identify detailed data, processes, and requirements shared between the CAAPS and NPDES permit program. This data will be obtained through communication with EPA subject matter experts who are well-versed in the permitting processes and requirements governed by each system/permitting program. Engaging with experts will ensure that the process maps and data collected accurately reflects the requirements and potential areas for alignment in automation. This data will be instrumental in identifying opportunities for standardization and integration of automation features. The agency will employ a comparative analysis to examine the common requirements identified between the CAAPS and NPDES permit program that are driven by the permitting processes they govern. This may also be informed by understanding the processes that were used to design, build, and deploy both systems. By understanding these shared elements and the information gathered in Activity G, EPA can make strategic decisions about where automation can be harmonized or enhanced. The activity is expected to be completed within 12 months, barring any unanticipated challenges, providing timely recommendations for further development enhancements. EPA will examine how to enhance efficiencies and determine the impacts of automation. This activity will enable EPA to make informed decisions about enhancing automation in permitting where it is most appropriate, ultimately improving the efficiency of the permitting processes involved in the CAAPS and NPDES permit program.
Alignment to Priority(ies)	This activity aligns with EPA's 2026-2030 Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership, specifically Objective 3.1 Incentivized Investment: Use Innovative Strategies to Reform and Streamline Permitting and other Public-Facing Operations. By identifying common requirements across both systems, EPA is taking concrete steps to streamline the permitting process where needed, thereby reducing the time, cost, and uncertainty businesses face when investing in America. When applied properly, increased automation and efficiency can significantly reduce permitting timelines, reduce mistakes in the permitting process, and make the overall process more transparent to industry and communities, thereby building trust between government and citizens and allowing for future investments in the American economy. This aligns with the Administration's goal to facilitate investment and job creation by ensuring efficient and transparent regulatory processes. By building and using evidence to address this priority, the agency ensures that strategic decisions are data-driven, maximizing the effectiveness of automation enhancements and fostering a regulatory environment conducive to economic growth and environmental protection.
Topics	Permitting Standardization, Shared Requirements Analysis

Activity	H	Identify the currently automated aspects of the CAAPS and NPDES permit program workflows and related aspects				
Supports Priority Question(s)...		1	2	3	4	5
		☐	☐	x	☐	☐
Description		EPA is currently focusing on potential automation aspects of these permitting systems, i.e., how permits move from point A to point B to point C, etc. (not the specific activities that occur at each point). This evidence-building activity focuses on identifying the currently automated aspects of the CAAPS and NPDES permit program workflows. The results of this activity will inform agency decisions on further integrating and optimizing automation features within these systems. By understanding what is already automated, EPA can pinpoint opportunities to enhance existing functionalities or introduce new automation capabilities within EPA's permitting line of business, thereby improving the efficiency, transparency, and accuracy of the federal permitting processes governed by these systems. These improvements will directly support the Administration's priorities by streamlining several regulatory processes and reducing administrative overhead associated with these permitting processes, focusing on how automation can achieve these goals. To accomplish this, the agency will develop (if not already developed) and compare process maps for				

	both programs/systems and collect detailed information about the automated processes within both the CAAPS and NPDES permit program. This data will be gathered through direct engagement with EPA subject matter experts via emails, focus groups, and interviews. Experts who have comprehensive knowledge of these systems will provide insights into the current state of automation within each system and help identify areas of potential enhancement. These process maps and qualitative data will be crucial for understanding the nuances of existing workflows, the extent of automation currently employed, and where automation can fill gaps. This evidence-building activity will focus on improving EPA's administrative internal processes and systems that move permits from point to point within the process/system and not the analysis of the documentation. If during the execution of this activity EPA determines that data will need to be gathered from knowledgeable external partners, EPA will engage appropriate partners (e.g., states, territories, local permitting authorities, and Tribes) to collect the necessary data. All external data collection will comply with the Paperwork Reduction Act (1980, 1995). The analytical approach will involve a comparative analysis to identify overlaps and gaps in automation. This activity is expected to be completed within 12 months, barring any unanticipated challenges, ensuring timely insights for decision-making. This will enable EPA to make informed decisions about further automation enhancements.
Alignment to Priority(ies)	The activity aligns with EPA's 2026-2030 Strategic Plan Goal 3: Advance Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership, specifically Objective 3.1 Incentivized Investment: Use Innovative Strategies to Reform and Streamline Permitting and other Public-Facing Operations, and Strategic Plan Goal 4: Develop Super Intelligence Capabilities, specifically Objective 4.2 Efficient Systems: Leverage SI to Improve EPA Processes and Capabilities. By identifying and enhancing automation in the CAAPS and NPDES permit program workflows, EPA is taking concrete steps to minimize permitting process timelines, thereby reducing the time, cost, and uncertainty businesses face when investing in America. This aligns with the Administration's goal to facilitate investment and job creation by ensuring efficient and transparent regulatory processes. Furthermore, these activities leverage automation to improve EPA's operational efficiencies, supporting the ambition to leverage automation in agency operations. By building and using evidence to address this priority, the agency ensures that strategic decisions are data-driven, maximizing the effectiveness of automation enhancements and fostering a regulatory environment conducive to economic growth and environmental protection.
Topics	Workflow Automation, Permitting Processes, Operational Efficiency

SECTION III | CHALLENGES

This section details any challenges to developing evidence as part of answering the Priority Questions, including any statutory or other restrictions to accessing relevant data.

Q1: EPA understands that a one-size-fits-all approach for assessing achievement of environmental and human health outcomes and stewardship of tax dollars may not be appropriate across the Agency's grant programs. For instance, some aspects of grant programs do not focus directly on environmental and human health outcomes but instead provide technical assistance or training, that indirectly affect these types of outcomes. In such instances, it will likely be more challenging to empirically identify how dollars spent via grants directly result in improved environmental and human health outcomes. This challenge also exists for programs that target outcomes that do not manifest until far in the future (e.g., reductions in cancer resulting from a lifetime of lowered exposure to carcinogens). EPA plans to mitigate this challenge through scoping work, beginning in FY 2026 and continuing into FY 2027 with activities A and B, to identify measurable interim outcome measures (e.g., emission reductions) and/or to prioritize evaluating grant programs (or a subset of projects within a grant) whose scope and outcomes are more readily analyzable, and sufficiently refine methods and metrics to be appropriate for evaluation of selected grant programs.

EPA's grant programs employ a wide range of practices for monitoring grantee performance. EPA will carefully assess what data are needed to answer each question and determine what data currently exist and what needs to be collected to fill information gaps. Collecting the necessary data to construct the identified metrics may be challenging or infeasible in some instances, particularly when outcome data are not uniformly reported or are only reported to the states. EPA will work to identify proxy or interim measures where feasible when data are not available, and document limitations when necessary data are not available.

Adequate focus group recruitment and participation to gather information about grantee experiences may also be a challenge. EPA will undertake outreach efforts working with EPA's grant programs to mitigate this challenge.

Q2: For Activity E (Interviews with Subject Matter Experts) under Priority Question 2, the Paperwork Reduction Act requires that EPA first obtain approval from OMB for any Information Collection Request in which EPA intends to interview/collect information from more than 9 external (non-federal) parties. If EPA would like to interview more than 9 nonfederal employees (e.g. states), EPA may run into timeline challenges associated with getting an ICR approved.

EPA will address this potential challenge strategically by initially focusing on nine or fewer participants to gather preliminary insights and then explore whether interviewing additional participants would add critical value. EPA will explore using already-approved generic ICRs to accomplish the goals of the activity.

Q3: For Activity H, if data needs to be gathered from knowledgeable external partners, EPA will comply with the Paperwork Reduction Act, which may limit the number of external parties that can be interviewed without an ICR approval.