SUMMARY OF FY 2013 PROGRAM EVALUATIONS

In FY 2013, 31 EPA programs were evaluated in order to support program improvement, learning, and accountability. The evaluations addressed all five of the Agency's strategic goals but particularly emphasized Goal 3, Cleaning Up Communities and Advancing Sustainable Development, and Goal 2, Protecting America's Waters (see Figure 1).

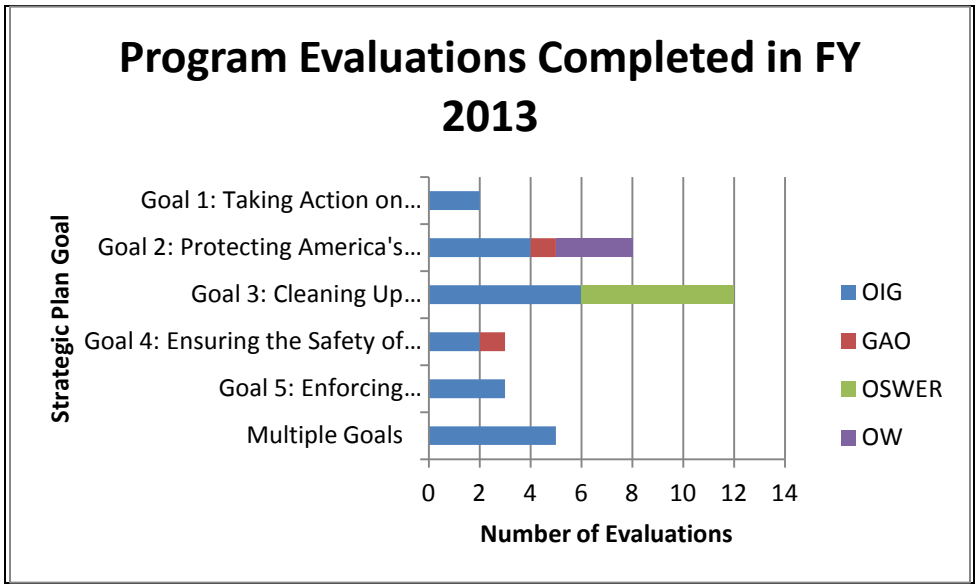

Figure 1. FY 2013 Program Evaluations by Strategic Goal and Evaluator

The EPA Office of the Inspector General (OIG) conducted the majority (20 evaluations, or 64 percent) of the evaluations; contractors and program offices conducted eleven evaluations (29 percent), and the U.S. Government Accountability Office (GAO) conducted two evaluations (six percent).

The evaluations addressed a variety of themes, including ethics, internal controls, data quality, and stakeholder engagement. However, most of the evaluations focused on improving program management and operations. For example, one evaluation found that even though EPA Regional offices have expanded contingency planning for inland oil spill response, their efforts need more support from EPA Headquarters such as resource assessments, incorporating best practices from national level response exercises, and other program guidance.

The most common ways that programs have improved in light of evaluation findings has been to strengthen administrative, management, oversight, and internal controls. For example, one evaluation found that EPA's Office of International and Tribal Affairs (OITA) could improve how it does strategic planning by issuing better guidelines and utilizing the data they collect on EPA's international activities. Overall, the evaluation findings suggested that OITA's strategic planning guidance needs to be updated to provide greater accountability and justification for the international activities and grants that OITA manages.

Several program evaluations support EPA's *E-Enterprise for the Environment* initiative to move all required data reporting to electronic systems in order to target enforcement resources, reduce reporting burden on regulated entities, and improve transparency by increasing public access to EPA data. At least seven evaluations highlighted the need for better data management systems and improved access to data for both EPA and the public.

EPA program evaluations are also looking at how the agency plans to address the challenges that climate change poses to not just the mission of protecting human health and the environment, but how we work towards that mission. For example, in FY 2013 EPA evaluators examined how water programs were integrating climate change and adaptation into core program work. They found that the degree of integration of climate change into the National Water Program needs improvement. The study found a range of barriers preventing the integration of climate change considerations into OW's daily operations. The evaluators made specific recommendations about how to address this short coming and OW is currently considering them.

In addition to examining EPA's processes and programs, evaluations can also look across the federal government to find improvements, especially when interests and jurisdictions between agencies overlap. For example, a GAO evaluation found inefficiencies and overlaps between EPA's and USDA's programs to assist rural communities with water access problems. In response to the GAO's recommendations the EPA and USDA formed an intra-agency working group that also included HUD and IHS. These agencies now coordinate technical and funding assistance for water projects in rural areas. One of the first improvements to the federal rural water projects process that the EPA-USDA-HUD-IHS work group made was to standardize the Preliminary Engineering Report (PER) template for communities that are seeking loans or grants from federally funded programs. The template was released in January 2013 and has already been adopted by most direct loan/grant programs operated by each of the agencies. EPA and USDA are also improving how they manage joint water and wastewater projects along the U.S.-Mexico border by identifying infrastructure needs and vetting approaches to support small disadvantaged communities. The agencies are currently drafting a work plan which will guide efforts in FY 2014.

FY 2013 ANNUAL PERFORMANCE REPORT PROGRAM EVALUATIONS

Goal	Evaluation Title/Evaluator/ Public Access	Scope or Key Questions	Findings	Recommendations and EPA Response
Multiple Goals	*EPA Can Better Document Resolution of Ethics and Partiality Concerns in Managing Clean Air Federal Advisory Committees* OIG Report No. 13-P-0387, September 11, 2013 http://www.epa.gov/oig/reports/2013/20130911-13-P-0387.pdf	To determine whether EPA has managed the Clean Air Scientific Advisory Committee (CASAC) and Advisory Council on Clean Air Compliance Analysis (Council) in accordance with applicable laws, regulations and guidance pertaining to 1) potential conflicts of interest; 2) appearances of a lack of impartiality; 3) rotation of members (i.e., term limits); 4) balance of committee viewpoints and perspectives; and 5)	EPA has adequate procedures for identifying potential ethics concerns, including financial conflicts of interest, independence issues, and appearances of a lack of impartiality. However, EPA can better document its decisions on selecting members with independence and partiality concerns. OIG identified one instance where Agency procedures involving a potential conflict of interest were not followed. OIG also reviewed the peer review process for three EPA-developed analyses included in scientific assessments peer reviewed by the CASAC. Peer review is one method for enhancing the quality and credibility of the government's scientific information. One of these analyses was not peer reviewed in accordance with Office of Management and Budget (OMB) and	OIG recommended that EPA instruct staff on the proper process for addressing potential conflicts of interest, develop procedures to document decisions and mitigating actions regarding independence and partiality concerns, and implement a process to determine whether its scientific work products are influential scientific information that requires peer review in accordance with OMB and EPA guidance.

		peer review.	Agency guidance.	
1	*EPA Should Improve Monitoring of Controls in the Renewable Fuel Standard (RFS) Program* OIG Report No. 13-P-0373, September 5, 2013 http://www.epa.gov/oig/reports/2013/20130905-13-P-0373.pdf?source=WebReports	To determine whether EPA has assessed program risks and designed necessary controls in the RFS program.	EPA has assessed risks and implemented a number of control activities in the RFS program through regulations. However, the Agency does not meet the control standard for monitoring some of these control activities. Also, EPA does not track submission of third-party engineering reviews or annual attest engagements because it lacks an electronic monitoring system for these reports.	OIG recommended that the Office of Air and Radiation (OAR) modify existing electronic systems to track the submission of reporting requirements to ensure that all participants comply with applicable RFS program regulations. OIG also recommended that OAR determine whether potential conflicts of interest exist from allowing the same third party to complete multiple reporting requirements and monitor potential conflicts for any negative impacts to program integrity, and revise regulations as appropriate to include specificity on independence requirements. **EPA Response:** OAR agreed with the electronic submission third party controls recommendation, specifically third-party engineering reviews and attest engagements, and, as of May 2013, began requiring electronic submission of attest engagements. OAR is on track to begin the electronic collection of engineering reviews by the end of 2013. OAR will incorporate tracking functionality in the future EPA Moderated Transaction System, scheduled to be completed in Q3 FY

				2015. OAR expects to make a policy decision concerning third-party independence in the final rule to establish a voluntary quality assurance program for verifying the validity of renewable identification numbers.
1, 5	*EPA Needs to Improve Air Emissions Data for the Oil and Natural Gas Production Sector* OIG Report No. 13-P-0161, February 20, 2013 http://www.epa.gov/oig/reports/2013/20130220-13-P-0161.pdf	To determine whether EPA has the data needed to make key decisions regarding air emissions from oil and natural gas production.	EPA has limited directly-measured air emissions data for air toxics and criteria pollutants for several important oil and gas production processes and sources. EPA does not have a comprehensive strategy for improving air emissions data for the oil and gas production sector.	OIG recommended that EPA develop and implement a comprehensive strategy for improving air emissions data for the oil and gas production sector, prioritize which oil and gas production emission factors need to be improved, develop additional emissions factors as appropriate, and ensure the National Emissions Inventory (NEI) data for this industry sector are complete. **EPA Response:** OAR and the Office of Research and Development (ORD) plan to establish a dedicated cross-office team to identify, prioritize, and propose actions to address data gaps, contingent upon resource availability. OAR is also developing an e-reporting program to expedite development of emission factors. Finally, OAR is developing a tool to estimate nonpoint source emissions that can be used to address data gaps in the NEI.

Multiple Goals	*International Program Office Needs Improved Strategic Planning Guidance* OIG Report No. 13-P-0386, September 9, 2013 http://www.epa.gov/oig/reports/2013/20130909-13-P-0386.pdf	To examine 1) the statutory authority by which EPA awards international grants; 2) anticipated environmental outcomes of foreign grants; and 3) tools in place to manage outcomes and measures for grants. OIG focused on activities of EPA's Office of International and Tribal Affairs (OITA), which awards grants to support international activities.	EPA has the statutory authority to conduct international activities and has several tools in place to help ensure that its partnerships with international entities achieve environmental and human health goals. Although OITA collects environmental outcome/output information, OITA has not incorporated the information into a comprehensive strategic planning document. Also, the allocation of resources for planned activities is not described within OITA's current strategic planning documents. OITA's strategic planning guidance needs to be updated to provide greater accountability and justification for the international activities and grants that OITA manages. This would help assure that OITA's grants align with EPA's goals of advancing public health and environmental improvement and that EPA resources are properly allocated.	OIG recommended that the assistant administrator for OITA develop strategic planning guidance to document how OITA links its achieved outcomes for international and foreign grant activities to its strategic plan goals, the process used by OITA to allocate resources for its international and foreign grant activities, and how OITA's international and foreign grant activities align with EPA's overall goals.
3, 5	*Limited Oil Spill Funding Since the Enbridge Spill Has Delayed Abandoned Oil Well Cleanups; Emergency Oil Responses Not*	To examine hotline allegations that 1) EPA failed to request additional oil spill funding in response to its ongoing Enbridge pipeline spill costs and other	OIG findings partially substantiated allegation 1 and substantiated allegation 3, but did not substantiate allegations 2, 4, and 5. We also found that EPA lacks technical guidance on oil spills, which results in emergency responders using their discretion to develop and execute response	OIG recommended that EPA's Office of Emergency Management (OEM) establish risk-based priority criteria for use by the regions in their requests to EPA Headquarters for Oil Spill Liability Trust Fund funding and in implementing oil spill responses. OIG also recommended

	Impacted OIG Report No. 13-P-0370, September 4, 2013 http://www.epa.gov/oig/reports/2013/20130904-13-P-0370.pdf	uncontrolled oil discharges; 2) EPA Headquarters told regions there would be a shortage of emergency funding through 2014; 3) limited funding resulted in cleanup delays at known oil-discharge sites; 4) EPA's administrative orders lacked required language specifying which costs can be recovered by the government; and 5) EPA had not submitted requests for reimbursement of its Enbridge spill oversight costs.	actions. While this may be adequate and sufficient for typical emergency oil spills, the large-scale release of tar sands oil in the Enbridge spill had not been encountered before by EPA. Oil spill guidance or a more robust application of lessons learned from major oil spill cleanups could provide essential information for other EPA regions to use in future spills of this nature.	that OEM develop a process for sharing lessons learned from large or unprecedented oil spills such as Enbridge.
Multiple Goals	*Review of Hotline Complaint Concerning the Region 4 Environmental Justice (EJ) Small Grants Selection Process* OIG	To determine whether the Region 4 Office of Environmental Justice (OEJ) followed policies and procedures when selecting EJ Small Grants recipients for fiscal years 2010, 2011 and 2012.	Management had controls in place to protect against bias, fraud, and pre-selection of EJ Small Grants recipients during fiscal years 2010, 2011 and 2012. Region 4 OEJ followed EJ Small Grants policies and procedures when selecting EJ Small Grants recipients, with the exception of one requirement. Region 4 OEJ did not ensure all review	OIG recommended that the Region 4 OEJ director provide adequate training to ensure that review panelists are knowledgeable about environmental justice prior to serving on EJ Small Grants consensus review panels. OIG also recommended additional training on objectivity and the definition of each ranking criterion. Further, OIG

	Report No. 13-P-0299, June 21, 2013 http://www.epa.gov/oig/reports/2013/20130621-13-P-0299.pdf		panelists were "knowledgeable about environmental justice prior to serving," a requirement of EPA Order 5700.5A1, but adhered to the other policies and procedures during the period OIG reviewed.	recommended that Region 4 OEJ obtain feedback from review panelists, as well as notify panelists when recipients are selected for awards.
3, 5	*Improved Information Could Better Enable EPA to Manage Electronic Waste(e-waste) and Enforce Regulations* OIG Report No. 13-P-0298, June 21, 2013 http://www.epa.gov/oig/reports/2013/20130621-13-P-0298.pdf	Does EPA have information of sufficient quality to assess the adequacy of its e-waste management and the effectiveness of its enforcement policies, to assure that public health is protected?	EPA does not have adequate information to ensure effective e-waste management and enforcement to protect public health and conserve valuable resources. Further, EPA lacks complete information on e-waste disposition, which hinders the effective use of its resources. EPA enforcement is hampered by the lack of complete information on cathode ray tube (CRT) exporters in the United States. This incomplete information hinders EPA's ability to set enforcement targets for the CRT Rule. EPA also does not have a practical process to determine the hazardous nature of non-CRT waste.	OIG recommended that EPA 1) develop a consistent approach for defining e-waste and identifying information to manage the e-waste universe; 2) develop a practical process to address hazards of non-CRT e-waste that ensures that this waste is managed in an environmentally sustainable manner; 3) evaluate implementation of the certification programs for used electronics; 4) evaluate resource needs for e-waste management; 5) evaluate methods for gathering the information needed to set CRT Rule enforcement targets such as the use of Resource Conservation and Recovery Act (RCRA) Section 3007 information request letters to identify CRT exporters.
3	*Better Planning, Execution, and Communication Could Have*	1) Why did EPA not meet planned corrective-action milestones for	EPA action officials did not complete planned corrective actions under the Libby Action Plan in a timely manner. This occurred because the	OIG recommended that EPA 1) require action officials to disclose risks to completing corrective-action plans and update and distribute

	Reduced the Delays in Completing a Toxicity Assessment of the Libby, Montana, Superfund Site OIG Report No. 13-P-0221, April 17, 2013 http://www.epa.gov/oig/reports/2013/20130417-13-P-0221.pdf	completing a comprehensive toxicity assessment of asbestos necessary to determine the cleanup level for the Libby, Montana, Superfund site? 2) Did EPA inform appropriate officials about the delays in a timely manner?	scope of the work was larger than originally thought; there was no established charter; and there were contracting delays, competing priorities, unanticipated work, and poor communication with stakeholders. Communications about delays in completing Libby Action Plan items, and the reasons for those delays, were not always timely or clearly communicated to stakeholders, and EPA officials failed to update the Agency's follow-up system or notify OIG about known delays until planned corrective actions under the Libby Action Plan could not be met.	original and revised plans to stakeholders; 2) establish a charter to define project roles and responsibilities for completing remaining corrective actions under the Libby Action Plan and determine whether the Science Advisory Board (SAB) or another organization will review the completed risk assessment; 3) direct the SAB to determine whether EPA has followed guidance sufficiently to support the findings in the toxicity assessment and whether other possible limitations exist when applying cancer and noncancer values to determine acceptable levels of exposure to asbestos in Libby; 4) ensure that future contracts issued through interagency agreements are within the scope of those agreements; and 5) develop a priority list for pending and ongoing research work.
Multiple Goals	*EPA Should Increase Fixed-Price Contracting for Remedial Actions* OIG Report No. 13-P-	Is EPA reducing the amount of high risk contracting activities for remedial actions?	EPA Acquisition System (EAS) contains inaccurate contract and task order types. Specifically, 5 of 17 contracts and 22 of 60 task orders and work assignments reviewed had an incorrect contract or award type listed in EAS. The inaccurate data in EAS is due to the lack of a specific EAS data quality plan and a decentralized	OIG recommended that EPA require written acquisition plans for cost reimbursement remedial action contracts are approved by the Head of the Contracting Activity. OIG also recommended that EPA develop performance measures and goals for each region for the use of fixed-price contracts and task orders, and

	0208, March 28, 2013 http://www.epa.gov/oig/reports/2013/20130328-13-P-0208.pdf		quality assessment process. As a result, EPA is misreporting contract and spending information to the public.	recommended that EPA provide training to staff on how and when less risky contracts and task orders should be used. Finally, we recommended that EPA determine whether staffing changes are needed in each region to ensure that the staff has the skills to manage the increased use of fixed-price contracts and task orders and develop a data quality plan for EAS to ensure the adequacy of data across all regions.
3	*Review of Hotline Complaint Regarding Residential Soil Contamination in Cherryvale, Kansas* OIG Report No. 13-P-0207, March 28, 2013 http://www.epa.gov/oig/reports/2013/20130328-13-P-0207.pdf	To determine whether EPA's actions identified and addressed all residential properties contaminated with heavy metals that presented an imminent and substantial threat to the public health.	OIG found over 35 residential properties with lead contamination that, according to samples taken during the 2001–2002 removal action, exceeded the action level. However, it was unclear which of these properties were excavated because some EPA records were missing or incomplete. Over a 6-month period, OIG made over 10 separate inquiries for the missing information. After receiving OIG's draft report, Region 7 provided some of the missing information. Despite the new information, there are still inconsistencies and gaps in the site records. Without complete documentation, neither EPA nor OIG can confirm EPA's assertion that all lead contamination presenting an imminent and substantial	OIG recommended that Region 7 review all site records and documents to determine whether there is an imminent and substantial endangerment to public health at the National Zinc Company site. To support this determination, Region 7 should revise or prepare an addendum to the Removal Action Summary Report that contains an accurate and complete account of EPA activities at the site as well as fully document and timely communicate to the public any actions taken. OIG further recommended that, as needed, Region 7 work with the State of Kansas to ensure appropriate action is taken to respond to any imminent and substantial endangerment to public health at the site. In addition,

			endangerment to public health at this site was fully identified and addressed. As a result, OIG cannot confirm or dismiss the allegations raised in the complaint.	OIG recommended that Region 7 document the costs to develop and implement the work necessary to address our recommendations.
Multiple Goals	*EPA Needs to Improve Management of Its School Environmental Health Efforts* OIG Report No. 13-P-0201, March 27, 2013 http://www.epa.gov/oig/reports/2013/20130327-13-P-0201.pdf	How does EPA implement its school environmental health programs to protect children's health?	EPA created the Clean Green and Healthy Schools (CGHS) initiative to promote healthier school environments. However, the initiative lacks necessary management controls to ensure that EPA provides consistent implementation of the program across the United States. The EPA did not meet all requirements of the Healthy High-Performance Schools subtitle of the Energy Independence and Security Act. The agency was nearly 3 years late issuing school environmental health guidelines for states, which delayed assistance to the states. The EPA also did not report annually, resulting in Congress being uninformed about delays. The Agency recently developed some measures for the initiative, but those measures are not specific enough to demonstrate program outcomes. In addition, regional staff may not be able to collect the data needed to determine how the initiative is	EPA should improve management controls for the CGHS initiative. This includes better planning, measures, and data collection procedures to ensure consistent regional implementation. The agency should also comply fully with the Energy Independence and Security Act by issuing guidance in a timely manner and reporting activities to Congress as required. Finally, EPA should regularly review its school environmental health programs to determine whether the Agency provides sufficient regulatory and voluntary program services to address the risks to children's health in schools.

			improving environmental health in schools. As EPA works to improve initiative management, the Agency needs to take into account the impact that funding reductions may have on its school environmental health efforts.	
3	*Results and Benefits Information Is Needed to Support Impacts of EPA's Superfund Removal Program* OIG Report No. 13-P-0176, March 11, 2013 http://www.epa.gov/oig/reports/2013/20130311-13-P-0176.pdf	1) What are the environmental benefits and impact of EPA's Superfund removal program? 2) What is the Agency's plan to achieve its future program goal?	EPA does not measure the environmental impact and benefits of the Superfund removal program. The goals of the program are measured by determining the number of removals completed rather than how removals protect human health and the environment. This measurement limitation can diminish the perceived value of the program and be an obstacle to management focus on how removals contribute to protection of human health and the environment. Information on removal program impacts will allow EPA to better inform the public of the program's benefits and provide a strong foundation for budget requests. EPA's current numeric removal goal appears to be attainable based on past performance, although reductions in funding or changes in state needs or capabilities may impact EPA's ability to meet its goal.	OIG recommended that EPA identify environmental results and benefits of the removal program, communicate those results along with existing program results, and implement system controls to ensure required Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) data are entered and completed.
3	*EPA Could*	1) Is EPA's	EPA regions have expanded	OIG recommended that the Assistant

	Improve Contingency Planning for Oil and Hazardous Substance Response OIG Report No. 13-P-0152, February 15, 2013 http://www.epa.gov/oig/reports/2013/20130215-13-P-0152.pdf	contingency planning structure for responding to oil spills and hazardous substance releases effective? 2) Are EPA plans updated to reflect lessons learned from recent major events, new developments, or industry trends?	contingency planning by creating additional plans and materials, but regions cannot maintain this large volume of information with their limited resources. Regions have created subarea contingency plans, geographic response plans and strategies, and various web-based tools. This structure exceeds the three levels of plans established in the Oil Pollution Act, which revised the National Contingency Plan (NCP) to expand the response system. Regions developed additional plan materials because regional On-Scene Coordinators find them necessary to respond to incidents. Some written plans miss some NCP requirements, contain duplicative information, and are out-of-date. Technological methods—instead of revising written plans—would enable EPA to maintain current information needed to efficiently respond to spills.	Administrator for Solid Waste and Emergency Response 1) issue guidance to regions on working with their Regional Response Teams and Area Committees to use the most efficient method available to address NCP requirements; 2) require regions to keep critical planning information up-to-date and avoid unnecessary duplication; 3) work through the office's National Response Team capacity to develop a process to regularly incorporate lessons learned from national exercises into contingency plan reviews and updates; and 4) assess the resources necessary to develop and maintain contingency plans and use the results to develop a workforce plan to distribute contingency planning resources.
3	*Status of Corrective Actions in Response to 2008 Report, "Framework for Developing Tribal Capacity Needed in Indian*	What actions has EPA taken to address the OIG report on tribal capacity?	EPA has taken a number of actions to address findings and recommendations from OIG's 2008 report, including developing the GAP Online database, drafting a GAP guidebook, and revising GAP guidance. EPA is also engaging or will engage in tribal consultation for both the guidebook and guidance.	OIG recommended that the Assistant Administrator for International and Tribal Affairs complete implementation of corrective actions initiated in response to the 2008 report and denote May 2013 as the date to implement actions to address the 2008 report recommendations.

	General Assistance Program (GAP)" OIG Report No. 13-P-0057, November 27, 2012 http://www.epa.gov/oig/reports/2013/20121127-13-P-0057.pdf		EPA said it intends to finalize its revised GAP guidance, including the guidebook, by May 2013. EPA has focused on ensuring that GAP work plans include intermediate and long-term outcomes/goals. EPA said it has made an incremental shift in the way it distributes GAP funding and said it will make additional changes based on internal conversations and information in GAP Online. Although EPA certified all actions as completed in its Management Audit Tracking System, corrective actions are still in progress and OIG could not test their effectiveness. EPA should have an implementation period following issuance of the final GAP guidance and guidebook before OIG evaluates how well tribes and EPA regions operate under the new guidance.	
4	*Implementation Plan with Cost Sharing Methodology Needed for Region 8 Senior Environmental Employee (SEE) Work on Lead Risk Reduction*	To determine the extent to which Region 8 has work plans on agreed-to SEE activities and a methodology for SEE funding.	The two Region 8 program offices that jointly implement the Lead Renovation, Repair and Painting Program do not have methodology or agreement for sharing SEE funding, which has led to confusion about respective roles and tasks. Additionally, most of the funding has gone to the office that does not have a finalized work plan and, as a result, the other office cut its SEEs to part-	OIG recommended that the Region 8 Regional Administrator develop a strategy for implementing the Lead Renovation, Repair and Painting Program that defines program goals, performance measures, organizational responsibilities, and a methodology for allocating SEE funding. OIG also recommended that the Regional Administrator develop an oversight process to evaluate the

	OIG Report No. 13-P-0430, September 24, 2013 http://www.epa.gov/oig/reports/2013/20130924-13-P-0430.pdf		time. Because of OIG's inquiry, the region has redistributed funds. However, even though the two offices have recently discussed the importance of joint strategic planning, they have yet to reach a long-term agreement on SEE activities and related funding.	region's success in implementing the strategy.
2	*Draft National Rivers and Streams Assessment (NRSA) 2008-2009, A Collaborative Survey* EPA's Office of Wetlands, Oceans and Watersheds (OWOW) and Office of Research and Development (ORD) EPA/841/D-13/001, February 28, 2013 http://water.epa.gov/type/rsl/monit	To determine the extent to which rivers and streams support a healthy biological condition and the extent of major stressors that affect them. In addition, the survey supports a longer-term goal: to determine whether U.S. rivers and streams are getting cleaner and how EPA might best invest in protecting and restoring them.	Twenty-one percent of the nation's river and stream length is in good biological condition, 23% is in fair condition, and 55% is in poor condition, based on a robust, commonly used index that combines different measures of the condition of aquatic benthic macroinvertebrates (aquatic insects and other creatures such as crayfish). Compared to the findings of the 2004 Wadeable Stream Assessment, the report found some statistically significant changes in stream condition. Nationally, the amount of stream length in good quality for macroinvertebrate condition dropped from 27.4% in 2004 to 20.5%; this change appears driven in large part by a 13.3% decline in streams in good condition in the Plains and Lowlands climatic region. In addition, the percentage of stream	The National Aquatic Resource Surveys provided EPA and states with the first nationally consistent, representative baseline of the quality of the nation's waters. As these statistical surveys are repeated, they document changes from cycle to cycle. A picture of the condition of the nation's streams is emerging from this survey and its predecessor streams assessment. U.S. streams are under significant stress and more than half exhibit poor biological condition. Phosphorus, nitrogen, and streambed sediments in particular have widespread and severe impacts; reducing levels of these constituents will significantly improve the biological health of rivers and streams. This survey suggests the need to expand efforts to address the many sources of these stressors—including runoff from urban areas,

	oring/riverssurvey/upload/NRSA0809_Report_Final_508Compliant_130228.pdf		length in good condition for phosphorus dropped nationally from 52.8% to 34.2% and declined in all three major climatic regions. However, other indicators showed an increase in stream length in good condition. The percent of stream length with good in-stream fish habitat rose from 51.7% to 68.9%, and percent of stream length in good condition for riparian disturbance (i.e., with low levels of disturbance) rose from 22.7% to 34.8%. It is important to note that these are differences for streams only, between two points in time.	agricultural production, and wastewater discharges—to ensure healthier waters for future generations.
2	*Rural Water Infrastructure: Additional Coordination Can Help Avoid Potentially Duplicative Application Requirements* Government Accountability Office (GAO) GAO-13-111, October 16, 2012	This report examines 1) the potential for fragmentation, overlap, and duplication among programs administered by EPA and USDA to address drinking water and wastewater infrastructure needs in rural communities; and 2) the extent to which these agencies coordinate at the federal and state level	GAO recommended that EPA and USDA complete guidelines to help states develop uniform preliminary engineering reports, develop guidelines to help states develop uniform environmental analyses, and reemphasize the importance of state-level coordination.	To improve coordination and to reduce the potential for inefficiencies and duplication of effort, GAO recommended that: 1) the Secretary of Agriculture and the Administrator of EPA ensure the timely completion of the interagency effort to develop guidelines to assist states in developing their own uniform preliminary engineering reports to meet federal and state requirements; 2) The Secretary of Agriculture and the Administrator of EPA work together and with state and community officials through conferences and workshops,

	http://www.gao.gov/assets/650/649553.pdf	to help meet the water infrastructure needs of rural communities.		Webinars, and sponsored training to reemphasize the importance of coordinating in all four key areas in the 1997 memorandum; and 3) the Secretary of Agriculture and the Administrator of EPA work together and with state and community officials to develop guidelines to assist states in developing uniform environmental analyses that could be used, to the extent appropriate, to meet state and federal requirements for water and wastewater infrastructure projects. **EPA Response:** A joint federal (EPA-USDA-HUD-IHS) and state workgroup developed a standardized Preliminary Engineering Report (PER) template for communities that are seeking loans or grants from federally funded programs. The template was released in January 2013 and has already been adopted by most direct loan/grant programs operated by each of the agencies. EPA and USDA have embarked on a joint project to improve estimates of gaps in water and wastewater infrastructure in Colonias along the U.S.–Mexico Border. The project will seek to identify disenfranchised communities that do not have the

				organization or resources to apply for assistance and are thus not represented on existing priority lists. The project will also pilot approaches to technical assistance and capacity building that can be applied more broadly and be provided in a manner that can be sustained long term. Ultimately, the project will identify infrastructure needs and vet approaches to support small disadvantaged communities. The agencies are currently drafting a work plan which will guide efforts in FY 2014. EPA is working with USDA to determine the extent to which environmental reviews for projects funded by USDA and the Clean Water and Drinking Water State Revolving Funds (SRF) are duplicative.
2	*EPA Oversight Addresses Thermal Variance and Cooling Water Permit Deficiencies But Needs to Address Compliance with Public Notice Requirements*	To assess status of EPA's oversight of regional and state compliance with the Clean Water Act (CWA) 316(a) and 316(b) requirements in National Pollutant Discharge Elimination System	EPA's Office of Water (OW) has made strides in addressing CWA §316(a) and (b) permit deficiencies through its permit quality reviews (PQRs) and through recommendations for improved regional oversight. However, OIG found that none of the state and regional public notices reviewed contain all of the required statements	OIG recommended that OW develop and implement oversight mechanisms that will help states and regions consistently comply with CWA §316(a) public notice requirements. **EPA Response:** Based on the evaluation findings, OW included an item on the NPDES Permit Review

	OIG Report No. 13-P-0264, May 23, 2013 http://www.epa.gov/oig/reports/2013/20130523-13-P-0264.pdf	(NPDES) permits.	describing the proposed §316(a) thermal variance. OIG also found that OW did not identify these deficiencies during the PQR process. OIG concluded that this is a weakness in OW's PQR process and oversight.	Checklist so that future NPDES PQRs will serve as an oversight mechanism to assess consistency of applicable NPDES permits CWA section 316(a) public notice requirements. See Part VII.B, Public Notice, of the draft NPDES PQR Checklist at http://www.epa.gov/npdes/pubs/pqr_attd.pdf
2	*Evaluation of the Role of Public Outreach and Stakeholder Engagement in Stormwater Funding Decisions in New England: Lessons from Communities* Ross Strategic and Industrial Economics (IEc), contractor to EPA, managed by EPA's Office of Policy Evaluation Support Division, with oversight by EPA Region 1's Assistance and	1) To what extent is a stakeholder process desirable for a community to decide on, and accept, a stormwater funding mechanism? Are there other alternative approaches that lead to the same outcomes? 2) What factors drive the need for, and value of, stakeholder processes in communities? 3) What specific elements of	The analysis confirmed that stakeholder support played a critical role in the successful adoption and implementation of stormwater funding mechanisms. In order to build stakeholder support and successfully adopt a stormwater funding mechanism, public outreach strategies and focused stakeholder engagement were crucial. Key lessons on effectively implementing a stakeholder engagement process included: • Identify and involve all key stakeholders. • Proactively engage stakeholders who support developing a utility as well as those that oppose it. • Foster deliberation and exchange of ideas among stakeholders with many points of view.	The evaluation recommended that federal and state entities 1) offer incentives to communities developing funding mechanisms to support their stormwater plans; 2) enhance communication to Municipal Separate Storm Sewer System (MS4) communities about state and federal stormwater requirements; and 3) offer state and/or federal incentives for regional, inter-municipal watershed-based funding solutions. Recommendations for agencies or institutions involved in stormwater management were to 1) identify or develop model stormwater utility ordinances based on state enabling legislation; 2) continue to evaluate and compile evaluations of MS4 communities' stormwater program funding efforts, and analyze those

	Pollution Prevention Unit in the Office of Environmental Stewardship EPA-100-K-13-0004, June 2013 http://www.epa.gov/evaluate/pdf/water/eval-sw-funding-new-england.pdf.	stakeholder processes help create or derail agreement on an effective approach to stormwater funding? 4) What contextual factors make stakeholder agreement on an effective approach to stormwater funding more or less challenging and in what ways? 5) How can stakeholder processes be designed to overcome contextual challenges? 6) How are stakeholder processes and decisions about stormwater funding mechanisms influenced by the overall cost of	• Start by discussing what the proposed program should accomplish, and only then talk about how to fund it; • Implement a stakeholder engagement process appropriate to the community's circumstances and budget. • Recognize that building adequate community support takes more than achieving consensus on an advisory committee's recommendation. Key lessons on effectively developing and implementing public outreach/involvement included: • Make a locally-compelling case that a stormwater funding program meets a critical need. • Demonstrate the cost-effectiveness and fairness of the funding approach. • Be responsive and flexible through the first few billing cycles.	that demonstrate strategic approaches to program development, funding solutions developed through stakeholder consensus, and trouble-free implementation; and 3) establish an online clearinghouse to share the resources listed above. **EPA Response:** Based on report results, the Region is undertaking the following: • Stakeholder Involvement and Reaching Consensus-Based Agreements Spring 2014: A stormwater utility planning/ (SWU) stakeholder involvement workshop for 45 western Massachusetts MS4 communities. • MS4 SWU Stakeholder Involvement Strategy Design Workgroup February 2014-Spring 2015: A roundtable workgroup convened to design stakeholder involvement blueprints tailored to New England MS4s' specific needs and circumstances. Over a 15-month period, municipal participants will collaborate with stormwater professionals in the design process. The Horsley Witten Group, a nationally

		stormwater management and the community's resources to address it? 7) Where a stormwater funding mechanism (e.g., stormwater utility) has been adopted, what were the strongest influences on adoption? What role, if any, did stakeholder agreement play? 8) Where a stormwater funding mechanism (e.g., stormwater utility) has been effectively implemented, what were the strongest influences on implementation? What role did stakeholder		recognized stormwater management consultant, will design and oversee the project and facilitate roundtable meetings. • Maine Stormwater Conference November 22, 2014: Presentation on the Program Evaluation Competition (PEC) Report *Evaluation of the Roles of Public Outreach and Stakeholder Engagement in Stormwater Funding Decisions in New England*. • In conjunction with Harvard Business School (HBS), the region is discussing plans for a roundtable workshop "Innovative Financial Mechanisms Roundtable for Towns Facing Stormwater and Wastewater Infrastructure Upgrades" and is participating in a multi-disciplinary workgroup to guide the workshop planning effort. If successful, this effort may lead to a pilot project between a MS4 community and HBS to design and implement one of these financial mechanisms.

		agreement play? 9) Can stakeholder agreement reduce litigation over stormwater funding mechanisms? 10) How much does it cost to run a stakeholder process to effectively consider stormwater funding options? 11) How can federal and state agencies help communities and stakeholders effectively consider stormwater funding options? 12) What guides, tools, or other resources would be most useful to communities considering stormwater funding		

		mechanisms?		
2	*Improved Internal Controls Needed in the Gulf of Mexico Program Office (GMPO)* OIG Report No. 13-P00271-340, May 30, 2013 www.epa.gov/oig/reports/2013/20130530-13-P-0271.pdf;	To evaluate the use of the five GAO standards of internal control (Control Environment, Risk Assessment, Control Activities, Information and Communications, and Monitoring) at EPA's GMPO.	Two of GMPOs performance measures were unrealistic in that they do not reflect what the office was set up to achieve. The two unrealistic measures involve the size of the hypoxic zone and the National Coastal Condition Report Index. Further, one strategic objective (environmental education) is not being measured. This occurred because GMPO had not performed an assessment of its strategic objectives and performance measures, as required by government wide internal control standards. As a result, some of the functions that GMPO performs are not being properly measured and, thus, GMPOs resources might not be used in the most efficient or effective way. GMPO management did not ensure that its Local Area Network (LAN) was secure, did not have primary information security controls in place, and did not ensure the contractor met the security requirements in the LAN contract. This occurred because the GMPO's former Acting Director was not trained on and therefore not technically knowledgeable of federal	OIG recommended that GMPO conduct a risk assessment of its strategic objectives and measures, and work with OW to adjust those measures as needed to accurately reflect GMPO's mission. OIG also recommended that GMPO and Region 4 officials correct the LAN security controls' deficiencies. OIG further recommended that GMPO complete actions to establish an office Web content review process. OIG recommended that the Office of Environmental Information address LAN deficiencies and, along with the Office of External Affairs and Environmental Education, monitor GMPO Web actions. EPA agreed with 12 of OIG's 13 recommendations and proposed a satisfactory alternative corrective action for the remaining recommendation. **EPA Response:** The Agency generally agreed with the findings and has taken steps to implement all of the report's recommendations. Most complying actions are complete and several have been implemented and are being monitored.

			and Agency IT security requirements. As a result, GMPO's LAN was determined to be vulnerable to individuals and groups with malicious intentions, and EPA has not received the full benefit of LAN security services over 4 years. The GMPO Web page displayed inaccurate data for over 18 months. GMPO did not perform a review of the content before posting, use a content manager to review the content, or follow EPA's Web governance policies or content review procedures. This occurred because GMPO personnel were not aware of EPA Web governance policies or content review procedures. Because information posted on EPA's Web pages is accessed by the public, inaccurate data can negatively impact EPA's credibility.	
2	*EPA's Handling of a Proposed Alternative Method for Measuring Oil and Grease in Wastewater Met Requirements But Controls Need to Be Strengthened*	To evaluate whether EPA's OW, in reviewing American Society for Testing and Materials' Standard Test Method for Solvent-Free Membrane Recoverable Oil and Grease by Infrared	EPA's review of ASTM D7575 and issuance of the proposed Methods Update Rule (MUR) and subsequent Notice of Data Availability (NODA) adhered to applicable laws, regulations, policies, procedures, and guidance. However, during our review, OIG found management control weaknesses that need to be addressed. Specifically, EPA lacked a	OIG recommended that the Assistant Administrator for Water 1) establish a procedure for reviewing proposed methods for method-defined analytes. This procedure should provide a general framework for review and address, at a minimum, the following issues: data to be submitted by the method developer or Voluntary Consensus Standard

	OIG Report No. 13-P-0317, July 11, 2013 http://www.epa.gov/oig/reports/2013/20130711-13-P-0317.pdf	Determination (ASTM D7575), adhered to applicable laws, regulations, policies, procedures, and guidance.	framework and procedures for reviewing alternative methods for method-defined analytes, such as ASTM D7575, which led to challenges in reviewing the method. The primary challenge EPA faced was in assessing the comparability of ASTM D7575 to the existing method for measuring oil and grease. EPA's lack of established procedures stemmed from the fact that it generally had not considered approving proposed alternative methods for method-defined parameters in the past, and requests to do so had been very rare. Because of its inexperience in reviewing such methods, OW had to devise the review process for ASTM D7575 as it went along. We found that OW took appropriate steps to review ASTM D7575 and make an informed decision, despite the challenges it faced and its lack of procedures for reviewing such alternative methods. However, the lack of an established review framework and other management control weaknesses contributed to confusion and delays in the review process, and contributed to concerns from stakeholders regarding preferential treatment of	Body, and statistical tests or analyses to be conducted to determine comparability between new proposed method and existing approved method; 2) establish procedures for designing official cut-off dates for future proposed MURs and include these procedures in OW's website; and 3) clarify on EPA's website OW's procedures and communications policies regarding the two distinct routes through which new methods may be approved by EPA. **EPA Response:** OW has completed recommendations 2 and 3 above and is actively working toward a draft of recommendation 1.

			ASTM D7575. If not addressed, these weaknesses have the potential to affect the timeliness of future EPA method reviews and perceptions of EPA's fairness and transparency.	
2	*EPA Can Better Address Risks to the Security of the Nation's Drinking Water Through New Authorities, Plans, and Information* OIG Report No. 13-P-0349, August 21, 2013 http://www.epa.gov/oig/reports/2013/20130821-13-P-0349.pdf	1) How does EPA ensure that its efforts and initiatives are safeguarding the nation's drinking water supply from attacks and natural disasters? 2) How has EPA addressed recommendations and suggestions from prior evaluations of the water security program?	OIG concluded that strategic planning and internal controls for the water security program need to be strengthened to allow the Agency to measure the program's performance and progress in drinking water systems' preparedness, prevention, response, and recovery capabilities. EPA's strategic planning in this area is hampered by its limited authority over water security, the voluntary nature of its water security activities, and concerns related to protecting information. These impediments could be overcome by the water security program utilizing available data, using alternative methods to gather data, and seeking additional authority from Congress to collect, protect, and utilize information from water systems. EPA should also expand its internal controls to meet Federal Managers' Financial Integrity Act (FMFIA) requirements.	OIG recommended that EPA 1) develop a comprehensive strategic plan across all program offices that are involved in EPA's water security program; 2) utilize information currently available to assess the state of water security across the nation, specifically by gathering water security data, and incorporating water security-related performance measures, targets, and annual commitments into OW's National Program Manager Guidance; 3) seek additional authority from Congress to better manage the security of drinking water systems and their water supply, including the ability to collect, protect, and utilize water system-specific security information; and 4) develop and implement a program review strategy and a multi-year internal control review plan for water security in accordance with requirements set by FMFIA, as implemented by OMB Circular A-123 and EPA Order 1000.24, which enables the Agency to address risks, assess effectiveness, reveal any

				weaknesses, and monitor actions to address those weaknesses.
2	*Evaluation of the National Water Program (NWP) Climate Change Adaptation Strategy* EPA's OW and Office of Policy Evaluation Support Division EPA-100-K-13-003, July 2013 http://www.epa.gov/evaluate/pdf/water/eval-water-climate-change-adapt-strategy.pdf	1) How well is climate mainstreamed into OW programs, and what implementation experience from the 2008 Climate Change Adaptation Strategy (Strategy) could be useful to guide implementation of the 2012 Strategy? 2) What is an appropriate measurement framework to track progress of actions in the 2012 Strategy?	The study noted that evaluation participants felt that the degree of integration of climate change into the NWP needs to improve. The study found a range of barriers preventing the integration of climate change considerations into OW's daily operations. The evaluators provide a set of recommendations to help in this area. On measurement, the evaluators suggest that OW apply the seven phases to track progress towards goals articulated in the 2012 Strategy by measuring both outputs and priority outcomes. In addition, the evaluation team documented several data quality and consistency challenges with baseline data reporting.	The evaluation recommends that EPA 1) reinvigorate NWP management and staff commitment to the Strategy; 2) create management practices that keep climate change integration front and center; 3) empower EPA staff and state, tribal, and local partners; and 4) clarify the purpose of measurement and pilot a measurement approach that includes outcomes. **EPA Response:** The Office of Water agrees that further efforts are needed to fully engage water program managers in HQ and Regions in responding to the impacts of a changing climate on clean water and drinking water programs. EPA is working to more clearly engage National Water Program and Regional senior managers in defining and implementing specific programs and policies for responding to climate change impacts, thus being responsive to the recommendations in the evaluation report. Other actions consistent with the recommendations in the report are also being developed.

3	*OSWER Risk Management Program (RMP) Evaluation Scoping Project* IEc, contractor to EPA http://www.epa.gov/evaluate/reports/index.htm	1) Is EPA's current RMP data adequate to support an evaluation? 2) If not, what additional data collection would be required?	EPA could study associations between chemical accidents and RMP inspections with existing data: • Existing data are not adequate to assess changes in facility behavior from RMP inspections. • Existing data are not adequate to assess the effects of changes in the RMP inspection strategy. • EPA has not systematically studied the effect of RMP inspections on facilities that are not inspected.	The evaluation team recommended that EPA take the following steps to improve the quality, accessibility, and usefulness of the data: 1) review the RMP data, notify facilities about potential errors, and verify that facilities submit needed corrections; 2) expand the "bridge table" between RMP Info and Integrated Compliance Information System (ICIS) to include more facilities; 3) review accident history and inspection data to establish chronology and account for duplicate records; 4) add new data fields to RMP Info and ICIS to reliably capture changes in facility behavior; 5) ensure that inspections are properly linked to resulting enforcement actions in ICIS; 6) continue to work with EPA's regional offices to ensure the quality and consistency of inspection reports; 7) backfill the ICIS database using pre-FY 2007 inspection reports to the extent feasible; 8) develop a clearer understanding of when and how different regions have implemented the "high-risk" strategy; 9) verify that EPA can link facility risk status (high-priority list) to inspection results and accident history; 10) study and document

				cases of general deterrence (effects of inspections on uninspected facilities) in the program; and 11) consider implementing a pilot study to target a subset of facilities for more frequent inspections**.** **EPA Response:** With current resources, OSWER is unable to implement the recommendations, each of which could require significant support.
3	*Hazardous Waste (HW) Determination Program Evaluation* IEc, under contract to EPA (contract EP-W-10-002) EPA-100_K-12-010, April 2013 http://www.epa.gov/evaluate/pdf/waste/haz-waste-determination.pdf	1) What is the national non-compliance rate with the HW determination regulations? 2) What is the non-compliance rate with the HW determination regulations by sector? 3) What obstacles or challenges do HW generators face in complying with the HW determination regulations? 4) What firm	The average non-compliance rate with RCRA HW determination regulations across the United States is 34%. This figure is based on an analysis of HW determination violations identified during EPA- or EPA/contractor-led comprehensive evaluation investigations recorded in RCRAInfo over the last 10 years. Among the sectors with the greatest overall number of HW determination violations, the following five sectors have the highest HW determination non-compliance rates: 1) printed circuit board manufacturing; 2) copper foundries; 3) hospitals; 4) colleges, universities, and professional schools; and 5) fabricated structural metal manufacturing. Uncertainties and limitations associated with these	The evaluators provided nine recommendations, divided into two groups. Changes EPA can make directly: 1) To the extent possible, simplify and improve the regulations, and provide sector-specific guidance; 2) establish a direct line of communication between EPA and HW stakeholders; 3) make guidance documents easily accessible via RCRA Online and make the generator website more user-friendly; and 4) improve tracking of compliance rates for HW determination. Opportunities to Work with Other

		characteristics influence HW generators' compliance with the HW determination regulations? 5) How do state program activities influence HW generators' compliance with the HW determination regulations? 6) How do assistance providers/HW service providers/trade associations' activities influence HW generators' compliance with the HW determination regulations? 7) What changes do stakeholders recommend to make the national	calculations (e.g., the inspections are not conducted at a representative sample of facilities) are detailed in Chapter 2 of the full report**.** Numerous challenges explain patterns of non-compliance with HW determination regulations. One of the most significant challenges generators cite is the difficulty making waste determinations for listed wastes. The challenges generally fell into three overarching categories: 1) challenges related to the regulations; 2) challenges related to generators; and 3) challenges related to regulatory agencies. States have developed a range of approaches to implement the federal HW requirements. The three states profiled in this evaluation have different methods for providing generator assistance and conducting compliance monitoring. Small business assistance providers, HW service providers, suppliers, and trade associations play an integral role in the HW determination process. Assistance providers are often the first to alert generators to their HW management responsibilities, including HW determination.	Stakeholders: 1) Identify opportunities to improve communications with state agencies to inform regulatory interpretations; 2) improve coordination with other agencies whose regulations overlap with those of EPA; 3) encourage best practices among states; 4) promote best practices from federal facilities; and 5) develop a communications strategy to increase awareness of compliance monitoring presence and enforcement actions related to HW determination. **EPA Response:** OSWER is considering a proposed rule change to help provide clarifications as to how to make a HW determination in the HW generator regulations (40 CFR 262). In addition, OSWER is carefully considering the recommendations on effective outreach and communication and how to incorporate these changes into our operations.

		HW program more successful?	Stakeholders' top recommendation for making the national HW program more successful is to provide, improve, and/or increase sector-specific HW determination guidance. Many stakeholders would like EPA to simplify and improve the HW determination regulations. Certain stakeholders expressed frustration with the non-intuitive, complex process of making HW determinations. Generators seek greater clarity about how to apply the existing regulations to their operations. In practice, many generators have essentially "outsourced" the HW determination process (even though by law generators themselves must make HW determinations). Stakeholders report that a combination of compliance monitoring and enforcement and compliance assistance is an effective approach to improving compliance with HW determination regulations. Current compliance data do not facilitate calculation of non-compliance rates pertaining to HW determination regulations.	
3	*Evaluation of Implementation of*	As part of the implementation of the	The development and publication of the GR Strategy has had some initial	The report's logic model was instrumental in organizing the

	the Superfund Green Remediation Strategy EPA's Office of Superfund Remediation and Technology Innovation (OSRTI) and Office of Policy EPA-100-R-11-009, November 2011 http://epa.gov/evaluate/pdf/waste/gr-strategy-eval-final-report.pdf	Superfund Green Remediation (GR) Strategy, the Superfund program evaluated the implementation of the Strategy itself. The chosen approach was to conduct a "formative" evaluation of the national-level effort. The purpose of the evaluation was to document the Strategy's effectiveness in achieving its stated goals by 1) assessing EPA experiences to date in implementing the Strategy; 2) determining a baseline against which to measure EPA progress in implementing the Strategy; and 3) determining the best metrics for measuring the program's success in implementing GR practices.	success in spreading general awareness about GR concepts and best practices, educating EPA staff, providing tools for implementation of GR practices, and supporting Agency interest in incorporating GR techniques into site cleanups and remedial plans. However, interview responses suggest that the Strategy is at an important transitional point, with a need for clear focus to ensure its continued longevity and success. The GR Strategy has a dual purpose to both physically reduce the environmental footprints at sites and improve awareness and integration of GR principles throughout the Superfund program. This dual purpose adds complexity to baseline development process. The CLU-IN website use data can be used to track awareness of the Strategy and related products (e.g., Best Management Practices (BMPs), Contracting Tool Kit). In addition, the footprint methodology developed by EPA appears to be a promising tool for measuring site-level impacts of GR activities, and Region 2 has developed a Clean and Green Policy Metrics Tracking Tool database for compiling site- level data, though it is	activities and filling gaps and duplications in the Superfund Green remediation Strategy. The report also helped OSWER understand whether it was pulling the right "levers" to change program behavior in pursuit of green remediation policy goals. The findings are being used to prepare the next phase of the Strategy.

			still in the testing phase.	
3	*Superfund Remedial Program Review* EPA's Office of Superfund Remediation and Technology Innovation (OSRTI) and EPA regions The plan will be posted within EPA's Superfund homepage http://epa.gov/superfund/cleanup/index.htm under the "Cleanup Process" section.	What actions can OSRTI and the regions take to help the Remedial Program remain effective in protecting human health and the environment in light of current and future budget and full-time employee reductions?	The Program Review identifies areas to explore to maintain effectiveness given current resource levels. At the site level, these involve taking early actions for some new sites, adopting more flexible pipeline strategies optimized for each site that allow normally sequential site work phases to overlap or to be combined (RD/RA), better use of data to custom-tailor remedies, and streamlining individual pipeline phases such as Five Year Reviews. At the program-wide level, efficiency gains can come from changing rules to speed up lab analysis work and budget work, from making greater use of in-house personnel instead of contractors, from improving the Superfund Enterprise Management System (SEMS), and from improved internal and external electronic communications.	The Program Review Action Plan identified a variety of new practices that could improve efficiency. They are grouped into two categories with the following focus areas: Cleanup Process • Adaptive Management • RD/RA Integration • Remedial Investigation/Feasibility Study (RI/FS) Process • Pre-Listing • Streamlining the Five Year Review process Program Management Actions • Project Data Management • Acquisitions • Budget • Alternative Bodies to Perform • In-house Resources • Leveraging Special Accounts

				• SEMS/IT • Superfund Web Special Project • Communications Many of the actions identified in the Program Review are underway and results will be realized quickly. Others make take several years to see any results. Progress and outcomes from the actions will be evaluated and reported on an annual basis. This review will be incorporated into the Program's annual planning cycle, making it a part of the program's operations.
4	*EPA Has Increased Efforts to Assess and Control Chemicals but Could Strengthen Its Approach* GAO GAO-13-249, March 2013 http://www.gao.gov/products/GAO-13-249	In 2009, EPA announced an effort to collect more toxicity and exposure data and conduct risk assessments to ensure the safety of Toxic Substances Control Act (TSCA) chemicals. This evaluation attempted to determine 1) what progress EPA has made in this effort; and 2) how this effort may have enhanced	Since 2009, EPA has made progress implementing its new approach to managing toxic chemicals under existing TSCA authority, particularly by increasing efforts to obtain chemical toxicity and exposure data and initiating chemical risk assessments. The results of EPA's chemical toxicity and exposure data collection activities, in most cases, have yet to be realized and it may take several years before EPA obtains much of the data it is seeking. EPA has not pursued some opportunities to obtain chemical data	GAO recommended EPA consider 1) promulgating a rule under TSCA section 8, or take action under another section, as appropriate, to require companies to report chemical toxicity and exposure-related data they have submitted to the European Chemicals Agency; 2) promulgating a rule under TSCA section 8, or take action under another section, as appropriate, to require chemical companies to report exposure-related data from processors to EPA; and 3) directing the appropriate offices to develop strategies for addressing challenges that impede the agency's

		the Agency's goal of ensuring the safety of such chemicals.	that companies submit to foreign governments or to obtain data from chemical processors that prepare chemicals substances after their manufacture for distribution in commerce—some of which could help support EPA's risk assessment activities.	ability to meet its goal of ensuring chemical safety. **EPA Response:** As EPA identifies needs for REACH[1]-generated data, the Agency intends to pursue obtaining those data from U.S. companies using voluntary or regulatory means as necessary. EPA has made public the 2012 Chemical Data Reporting (CDR) information containing comprehensive use and exposure data on more than 7,500 chemicals widely used in the United States, with similar disclosure planned at future CDR reporting periods. EPA intends to work with the Congress to further the enactment of essential TSCA reforms to strengthen the Agency's ability to carry out its chemical safety activities. Until legislative reform takes place, EPA will continue to implement its Existing Chemicals Strategy, which includes as its chief elements conducting risk assessments of TSCA Work Plan Chemicals, increasing public access to chemical data, and promoting

[1] Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) is a European Union regulation of the production and use of chemical substances in order to protect human and environmental health.

				innovation for safer products and green chemistry. The Agency considered the results of this evaluation along with many other inputs in developing the reorganization package for the Office of Pollution Prevention and Toxics, which has primary authority for implementing TSCA at EPA, designed to improve EPA's ability to assess and act on the risks posed by existing chemicals. The Agency also considered the results of this evaluation among many other inputs in developing proposed revisions to its Strategic Plan for FY 2018 and in developing the FY 2015 EPA President's Budget request. In particular, the Agency drew upon the findings of the GAO study in enhancing discussion in both documents of EPA's plans to assess the more than 80 TSCA Work Plan Chemicals identified in March 2012 and to harness the power of information to arrive at sound risk management decisions and to enhance public access to chemical data. The FY 2015 budget presentation was further enhanced by an increased focus on safer chemicals activities.

4	*EPA Is Not Recovering All Its Costs of the Lead-Based Paint Fees Program* OIG Report No. 13-P-0163, February 20, 2013 http://www.epa.gov/oig/reports/2013/20130220-13-P-0163.pdf	The objectives of the review were to determine 1) whether EPA is recovering the costs of administrating and enforcing the standards and requirements applicable to lead-based paint training programs and contractors; and 2) whether the Agency has effective internal controls over the assessment and collection of lead fees.	EPA is not recovering all its costs of administering the lead-based paint program.	OIG recommended that the Assistant Administrator of the Office of Chemical Safety and Pollution Prevention (OCSPP) update the March 2009 fees rule to reflect the amount of fees necessary to recover the program costs, and to apply indirect cost rates to all applicable direct costs to obtain the full cost of the program. OIG also recommended that the Office of the Chief Financial Officer (OCFO) conduct biennial cost reviews of the lead-based paint fee collections and the full cost of operating the program to determine whether EPA is recovering its costs, and determine the appropriate Agency indirect costs rates to be used for EPA's user fee programs. **EPA Response:** The OCSPP will update the 2009 Fees Rule following completion of at least one 5-year cycle of the Lead Renovation, Repair and Painting (RRP) accreditation and certification program, if warranted, based on findings from at least two consecutive biennial reviews that Lead Program costs continue to exceed the amount of fees collected. OCSPP will modify cost analysis procedures as appropriate once the OCFO clarifies applicable indirect costs rates. The OCFO also

				committed to implement the recommendations directed to OCFO's attention.