

**OECA's Plans for Early Engagement with States, Tribes, Associations to Identify National Enforcement Priorities/Areas of Focus**

*This is the Office of Enforcement and Compliance Assurance's (OECA's) plan for early engagement with states and tribes prior to developing the FY 2016/2017 National Program Manager (NPM) Guidance in collaboration with the EPA regions. The Office of Compliance (OC) will request assistance from EPA regions in soliciting early input directly from states and tribes for OECA's FY 2016/2017 NPM Guidance. On behalf of OECA, OC will also request early input from associations.*

Date	Engagement Milestone	Participants	Expected Output/Results
Week of June 16, 2014	OC/OECA coordinates and collaborates internally with lead region on proposed approach for early engagement with states and tribes.	Lead Region, OECA	<ul style="list-style-type: none"> <li>Agreement on approach</li> </ul>
June 23 - 30, 2014	OC/OECA requests early input from ECOS Compliance Committee, NASDA, AAPCO	OECA, ECOS, NASDA, AAPCO	<ul style="list-style-type: none"> <li>Responses to the 3 questions posed in OECA's 1 page background document (attached).</li> <li>Any other early input which states, tribes and associations would like to provide prior to development of FY 2016/2017 NPM Guidance.</li> </ul>
	OC/OECA requests early input from the National Tribal Caucus.	OECA, National Tribal Caucus	
	OC/OECA requests early input from ASTSWMO, ASDWA, ACWA, NACAA, AAPCA, SFIREG and Tribal representatives on the National Tribal Operations Committee.  OECA will coordinate with EPA program offices on approach to be used regarding early engagement with media specific tribal partnership groups.	OECA in coordination with EPA program offices, state associations and media specific tribal partnership groups.  Associations and groups include: ASTSWMO, ASDWA, ACWA, NACAA, AAPCA, SFIREG, National Tribal Water Council, Tribal Pesticide Program Council, National Tribal Air Association and Tribal Waste and Response Assistance Program Steering Committee.	
	Regions requests early input directly from state lead agencies. OC/OECA coordinates with regions and regional tribal operations committees (RTOCs) to obtain early input from tribes.	Regions use standard letter provided by OECA to promote consistency	

July 2014	EPA (via OCFO) sends letters to federally recognized tribes requesting early input	OECA will request OCFO assistance in soliciting early input on 3 specific questions posed in OECA's 1 page background document (attached).	
July 31, 2014	<p>States, tribes and associations submit early input for OECA's FY 2016/2017 NPM Guidance.</p> <p><i>Note: It is critical to receive early input in a timely manner in order to consider it in the development of the FY 2016/2017 NPM Guidance. Following receipt of early input, OC/OECA will compile and summarize the early input from states, tribes and associations and distribute it to the OECA divisions/offices and regional colleagues for their consideration and discussion prior to developing the FY 2016/2017 NPM Guidance.</i></p>		
July through November 2014	When OECA offices participate in any media-specific state and tribal association and partnership group meetings held between July and November 2014, OECA will remind participants of the opportunity to provide early input and continue to solicit early engagement.	OECA, program offices and media specific state associations and tribal partnership groups which hold meetings between July and November 2014	<ul style="list-style-type: none"> <li>Additional early input which the states, tribes, associations and partnership groups would like to provide prior to development of FY 2016/2017 NPM Guidance.</li> </ul>
October 31, 2014	<p>By October 31<sup>st</sup>, OECA will summarize in writing: (1) the early engagement process used and (2) the early input received from states, tribes and associations, including feedback on the most important areas of work. OCFO intends to share the summary document with states/tribes to inform NPM Guidance development. If states and/or tribes raise any cross-program topics during the early engagement process, the October 31<sup>st</sup> summary will identify those cross-program topics as well. The October 31<sup>st</sup> deadline is EPA-wide.</p>		

*See background document attached.*

**Attachment – Background Information on Request for Early Engagement with States, Tribes and Associations on OECA’s FY 2016 – FY 2017 National Program Manager (NPM) Guidance**

OECA and the EPA regions are interested in early input in response to the following 3 questions:

**1. What should be the focus of the FY 2017 – FY 2019 National Enforcement Initiatives and why?**

**Background: Current National Enforcement Initiatives (NEIs) for FY 2014 – 2016**

In FY 2013, after soliciting input from stakeholders and the public via a Federal Register (FR) Notice, OECA identified 6 National Enforcement Initiatives (NEIs) which are being implemented over a 3 year period, FY 2014 through FY 2016. The current **FY 2014 – FY 2016** NEIs address:

CAA National Enforcement Initiatives

- Cutting Toxic Air Pollution that Affects Communities’ Health
- Reducing Widespread Air Pollution from the Largest Sources, Especially the Coal-fired Utility, Cement, Glass, and Acid Sectors

CWA National Enforcement Initiatives

- Keeping Raw Sewage and Contaminated Storm water Out of Our Nation’s Waters
- Preventing Animal Waste from Contaminating Surface and Ground Waters

Mineral Processing

- Reducing Pollution from Mineral Processing Operations

Energy Extraction

- Assuring Energy Extraction Sector Compliance with Environmental Laws

These initiatives are reevaluated every three years in order to assure that federal enforcement is focused on the most important environmental problems where noncompliance is a significant contributing factor and federal enforcement can have a significant impact. **The next round of 3 year NEIs will address FY 2017 – FY 2019. OECA is interested in state and tribal early input on the appropriate focus of the NEIs for FY 2017 – FY 2019.** It’s possible that a subset of existing NEIs could continue in the next round; no decisions have been made on the next round of NEIs.

**2. What other priorities/areas of focus, beyond the NEIs, should OECA identify in the FY 2016 – FY 2017 NPM Guidance and why?**

**Background: Current Priorities/Areas of Focus for FY 2015 beyond NEIs**

In addition to the NEIs, OECA also identified the following national priorities for FY 2015:

- Assuring Safe Drinking Water
- Implementing the Clean Water Act Action Plan
- Advancing Next Generation Compliance, and
- Strengthening State Performance and Oversight.

OECA’s NPM Guidance also includes a program specific guidance section which provides critical national direction on specific program areas not addressed in the preceding section.

**3. Do states, tribes and associations have any other comments on the existing FY 2015 NPM Guidance for OECA to consider when drafting revisions for FY 2016 – FY 2017?**