EPA
United States
Environmental Protection
Agency

Plan EJ 2014

Resources Tools Development

Plan EJ 2014 is EPA's roadmap for integrating environmental justice into its programs and policies.

RESOURCES TOOLS DEVELOPMENT

Implementation Plan

September 2011

Led by
Office of Administration and Resources Management

U.S. Environmental Protection Agency
Washington, D.C. 20460

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PLAN EJ 2014 AT A GLANCE

Plan EJ 2014 is the U.S. Environmental Protection Agency (EPA)'s roadmap to integrating environmental justice into its programs and policies. The year marks the 20th anniversary of the signing of Executive Order 12898 on environmental justice. Plan EJ 2014 seeks to:

- Protect the environment and health in overburdened communities.
- Empower communities to take action to improve their health and environment.
- Establish partnerships with local, state, tribal, and federal governments and organizations to achieve healthy and sustainable communities.

As the EPA's overarching environmental justice strategy, Plan EJ 2014 has three major sections: Cross-Agency Focus Areas, Tools Development Areas, and Program Initiatives.

The Cross-Agency Focus Areas are:
- Incorporating Environmental Justice into Rulemaking.
- Considering Environmental Justice in Permitting.
- Advancing Environmental Justice through Compliance and Enforcement.
- Supporting Community-Based Action Programs.
- Fostering Administration-Wide Action on Environmental Justice.

The Tools Development Areas are:
- Science.
- Law.
- Information.
- Resources.

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1.0 INTRODUCTION

1.1 Goals

The U.S. Environmental Protection Agency (U.S. EPA)'s Office of Administration and Resource Management (OARM)'s implementation plan has two major components. The first component addresses the Agency's mechanisms for providing grants and technical assistance to support community-based action programs. The second component addresses workforce diversity. The goals of each are discussed below.

Grants and Technical Assistance: OARM's goal is to have an efficient and effective system for delivering financial and technical assistance to communities to empower them to improve their health and environment.

This goal includes establishing a transparent, integrated One EPA approach to organizing and implementing the Agency's community-based grants programs, streamlining grants processes consistent with the EPA's fiduciary responsibilities, and providing grants management training to communities. It also includes providing technical assistance to communities that find it difficult to manage grants, in order to build their capacity and strengthen their ability to analyze and use technical environmental information.

OARM's goal furthers the Administrator's priority of Expanding the Conversation on Environmentalism and Working for Environmental Justice by establishing a new paradigm for the delivery of EPA assistance to minority, low-income, tribal, and indigenous[1] peoples to create healthy and sustainable neighborhoods. It also responds to the cross-Agency focus area under Plan EJ 2014 of Supporting Community-Based Action Programs by building on the success of ongoing EPA grants and technical assistance activities, such as the Community Action for a Renewed Environment (CARE) Program. By aligning EPA's grants and technical assistance programs with the needs of all communities to achieve healthy, sustainable, green, and equitable development, OARM's vision advances the Agency's mission of protecting human health and the environment.

The purpose of this implementation plan is to realize OARM's vision over the next three years by charting a course of action for grants and technical assistance that will be accomplished collaboratively with communities and EPA's grants management workforce.

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[1] When these terms are used in this document, they refer to entities and individuals in the United States only.

Goals At-A-Glance

To develop an efficient and effective system for delivering financial and technical assistance to communities to empower them to improve their health and environment.

Workforce Diversity: OARM's goal is to achieve an inclusive work environment by developing an efficient system for the outreach and recruitment of potential employees. Development of a diversity portal, using social media tools, will be part of the system to attract qualified, diverse applicants. OARM will also provide Agency-wide diversity training for hiring officials.

This goal includes establishing an integrated One EPA approach to consistently recruit and select, both internally and externally, from diverse pools, the best-qualified candidates for all positions. The changing demographics of America mean that the public served by EPA is also changing. When EPA recruits and retains an inclusive workforce — one that looks like the America it serves — and individual differences are respected, appreciated, and valued, diversity becomes an organizational strength that contributes to achieving results.

OARM's Office of Diversity, Outreach, and Collaboration (ODOC), in conjunction with in collaboration with the Office of Human Resources (OHR) and the Office of Civil Rights (OCR), will work with the EPA national program offices and regions to broaden the standard outreach and recruitment efforts to attract qualified applicants from identified groups with low inclusion rates in EPA's workforce, in compliance with Equal Employment Opportunity (EEO) laws. OARM's workforce diversity goal furthers the Administrator's priority of Expanding the Conversation on Environmentalism and Working for Environmental Justice by establishing a new paradigm for selecting and hiring potential employees**.**

1.2 Organizational Structure

Grants and Technical Assistance: As communicated by the Deputy Assistant Administrator, Office of Enforcement and Compliance Assurance the Deputy Regional Administrator, Region 5, to the Deputy Assistant Administrators and Deputy Regional Administrators on November 5, 2010, the Agency will implement the Resources Tools Development elements for grants and technical assistance through the existing Grants Workgroup formed under the Deputy Administrator's Community-Based Coordination Project.

The Grants Workgroup is co-chaired by the Director, the Office of Grants and Debarment (OGD), OARM; and the Director, Financial Policy and Planning Staff, the Office of Financial Management (OFM), the Office of the Chief Financial Officer (OCFO). It includes the following seven Subgroups:

- Healthy Communities Coordinated Grants Subgroup: Office of Air and Radiation (OAR) and Region 9 (Co-Chairs).
- Technical Assistance Subgroup: Office of Environmental Justice (OEJ) (Chair).
- Training Subgroup: OCFO (Chair).
- Competition Subgroup: OGD (Chair).
- Internal Policies Subgroup: OGD (Chair).

- Legal Issues Subgroup: OEJ and Office of General Counsel (OGC) (Co-Chairs).
- Timely Award Subgroup: OGD and Office of Solid Waste and Emergency Response (OSWER) (Co-Chairs).

The Grants Workgroup has broad representation from EPA headquarters and regional offices.

Workforce Diversity: OARM's ODOC will be establishing a cross-Agency task force, the Outreach and Recruitment Task Force, with representatives from national program offices and regional offices to develop a national strategy to attract a diverse pool of qualified applicants.

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2.0 IMPLEMENTATION

2.1 Strategies

Grants and Technical Assistance: Under the framework of the Community-Based Coordination Project, the Grants Workgroup has the following charges:

- Improve community access to information about available grants and application processes.

- Design streamlined grants processes, grants bundling, and other approaches that ensure quality awards while reducing transaction costs to communities seeking assistance.

- Design efficient and effective approaches to provide technical assistance to communities that find it difficult to manage grants.

- Coordinate with related ongoing grants streamlining efforts.

To accomplish these charges, the workgroup has established seven strategies:

- **Strategy 1:** Increase Transparency and Efficiency in Providing Community-Based Grant Opportunities.

- **Strategy 2:** Improve Delivery of Technical Assistance to Communities.

- **Strategy 3:** Strengthen Grants Training for Communities.

- **Strategy 4:** Improve Community Awareness of Grant Competition Process.

- **Strategy 5:** Revise Grant Policies that are Unduly Restrictive.

- **Strategy 6:** Encourage OGC/Office of Regional Counsel (ORC)/Program Office Dialogue on Community-Based Grant Opportunities.

- **Strategy 7:** Improve timeliness of Brownfields Grant Awards.

Workforce Diversity: The Outreach and Recruitment Task Force will have the following charge:

- Increase the diverse pool of qualified applicants.

- Operate under an integrated One EPA approach for recruitment and outreach.

2.2 Activities

Grants and Technical Assistance: To implement these seven strategies, the Grants Workgroup has identified a set of priority activities. OGD is responsible for overseeing the workgroup's progress in completing these tasks.

Community Action for a Renewed Environment Grant Program

The Community Action for a Renewed Environment (CARE) program is a competitive grant program that provides on-the-ground support and funding to help revitalize and improve the health of communities in sustainable ways. Through CARE, various local organizations, including non-profits, businesses, schools and governments, create partnerships that create and implement consensus-based local solutions to reduce releases of pollutants and minimize people's exposure to them. Through CARE, community leaders develop expertise in sustaining partnerships and addressing environmental issues, providing a strong basis for continued future action as other environmental threats emerge in the community. Since 2005, CARE has provided over $14.5 million in financial assistance to 80 communities in 39 states and territories. CARE offers two levels of financial assistance, up to $100,000 for Level I and up to $300,000 for Level II grants.

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Strategy 1: *Increase Transparency and Efficiency in Providing Community-Based Grant Opportunities.*

- <u>Activity 1.1</u>: Draft recommendations for improving community group access to EPA grant programs to be presented to Executive Management Committee (EMC) in March 2011.
- <u>Activity 1.2</u>: Solicit informal feedback from communities (e.g., CARE Program workshops).
- <u>Activity 1.3</u>: Conduct outreach to regions and National Program Managers (NPMs) via conference calls and sharing of drafts.

Strategy 2: *Improve Delivery of Technical Assistance to Communities.*

- <u>Activity 2.1</u>: Develop Technical Assistance Center approach.
- <u>Activity 2.2</u>: Preliminary draft options to be presented to the EMC in March 2011.
- <u>Activity 2.3</u>: Obtain senior management guidance on initial concepts before obtaining informal feedback from communities.
- <u>Activity 2.4</u>: Conduct outreach to regions and NPMs via conference calls and sharing of drafts.

Strategy 3: *Strengthen Grants Training for Communities.*

- <u>Activity 3.1</u>: Create umbrella, basic on-line grants training for communities, environmental justice-specific on-line training, and program-specific training (e.g., CARE, Urban Waters).
- <u>Activity 3.2</u>: Develop training modules by December 2011.
- <u>Activity 3.3</u>: Obtain informal community feedback as modules developed.
- <u>Activity 3.4</u>: Conduct outreach to EPA grants management community by providing opportunities for review of draft training scripts.

Strategy 4: *Improve Community Awareness of Grant Competition Process.*

- <u>Activity 4.1</u>: Develop and implement appropriate grant competition tools (e.g., listservs, webinars). Tools will be in place by October 2011.
- <u>Activity 4.2</u>: Obtain informal community input through Regional/Headquarters websites.
- <u>Activity 4.3</u>: Work with regions and NPMs to develop and implement tools.

Strategy 5: *Revise Grant Policies that are Unduly Restrictive.*

- <u>Activity 5.1</u>: Revise Delegation 1-86 and indirect cost rate policies for environmental justice grants by the end of 2011. Temporarily revised delegation policies were issued in November 2010.
- <u>Activity 5.2</u>: Establish simplified Indirect Cost Rate (ICR) policy by October 2011.
- <u>Activity 5.3</u>: Obtain informal community feedback once draft ICR policy developed.
- <u>Activity 5.4</u>: Conduct outreach to regions and NPMs by providing opportunity to comment on draft policy issuance.
- <u>Activity 5.5</u>: Explore simplification of other policies.

Strategy 6: *Encourage Office of General Counsel/Office of Regional Counsel/Program Office Dialogue on Community-Based Grant Opportunities.*

- ▪ <u>Activity 6.1</u>: Conduct periodic OGC/ORC/OEJ meetings and OGC guidance on scope of community-based grant authorities. OGC/ORC/OEJ calls were conducted on January 5, 2011, and February 2, 2011.
- ▪ <u>Activity 6.2</u>: Obtain OGC legal guidance on scope of grant authorities.
- ▪ <u>Activity 6.3</u>: Coordinate discussions with larger OGC effort on existing legal authorities.

Strategy 7: *Improve timeliness of Brownfields Grant Awards.*

- ▪ <u>Activity 7.1</u>: Develop recommendations for consistent Brownfields award times by August 2011. Draft recommendations will be shared with the EPA's Grants Management Officers (GMOs) and OSWER. This is primarily an internal Agency process issue.

The workgroup anticipates that it will complete all of these priority activities by the end of 2011. It recommends that the Agency codify workgroup accomplishments in a consolidated Grants Policy approved by senior Agency management. No additional Full Time Employee (FTE) will be required to complete agreed-upon tasks. As described above, each Subgroup under the Grants Workgroup will conduct appropriate community and stakeholder outreach.

Workforce Diversity: *To meet its goals, the Outreach and Recruitment Task Force has identified four priority activities. OARM's ODOC is responsible for overseeing the workgroup's progress in completing these tasks.*

- ▪ <u>Activity 1</u>: Design an efficient Agency-wide outreach strategy by January 2012.
- ▪ <u>Activity 2</u>: Develop effective marketing materials and strategy by January 2012.
- ▪ <u>Activity 3</u>: Develop a National Conference Toolkit by January 2012.
- ▪ <u>Activity 4</u>: Develop a National Outreach Calendar by January 2012.

OARM will also provide Agency-wide diversity training for hiring officials.

2.3 Community Engagement and Stakeholder Outreach

Grants and Technical Assistance: As noted in Section 2.2, the Grants Workgroup is seeking informal feedback from communities in developing revisions to policies, procedures, and organizational structures. More formal community feedback (for example, feedback from the National Environmental Justice Advisory Council [NEJAC]) may be required for certain activities, including the development and selection of options under Strategies 1 and 2. As workgroup activities proceed, OARM will consult with OEJ to determine the need for formal community feedback.

2.4 Adjustments

Grants and Technical Assistance: OGD will carefully monitor and evaluate the effect of revised policy and procedures in Fiscal Year (FY) 2012. If the Agency and communities are not realizing the desired outcomes, OGD and the workgroup will make necessary adjustments in FY 2013 to reach the desired outcomes.

3.0   DELIVERABLES

3.1 Schedule of Deliverables

Grants and Technical Assistance: Appendix B contains a draft schedule of deliverables along with associated performance measures.

Workforce Diversity: OARM's ODOC is in the process of soliciting proposals from contractors for diversity training. It is anticipated that the Outreach and Recruitment Task Force will initiate all of these priority activities by the end of 2011.

3.2 Measures

Grants and Technical Assistance: See Appendix B.

Workforce Diversity: Measures will be developed in a collaborative manner once the Task Force is convened.

4.0 REPORTING

Grants and Technical Assistance: The Grants Workgroup will provide quarterly progress updates as part of the Community-Based Coordination Project. OARM will submit an annual progress report at the end of each FY as required by Plan EJ 2014. For information, please contact Howard Corcoran, 202-564-1903, Corcoran.Howard@epa.gov.

Workforce Diversity: Reporting will be developed in a collaborative manner once the Outreach and Recruitment Task Force is convened. For information, please contact Antoinette Powell-Dickson, 202-566-0738, Powell-Dickson.Antoinette@epa.gov.

APPENDIX A: ACRONYMS

CARE	Community Action for a Renewed Environment
EEO	Equal Employment Opportunity
EMC	Executive Management Committee
EPA	U.S. Environmental Protection Agency
FY	Fiscal Year
GMO	Grants Management Officers
ICR	Indirect Cost Rate
NEJAC	National Environmental Justice Advisory Council
NPM	National Program Managers
OARM	Office of Administration and Resource Management
OAR	Office of Air and Radiation
OCFO	Office of the Chief Financial Officer
OCR	Office of Civil Rights
ODOC	Office of Diversity, Outreach and Collaboration
OEJ	Office of Environmental Justice
OFM	Office of Financial Management
OHR	Office of Human Resources
ORC	Office of Regional Counsel
OGC	Office of General Counsel
OGD	Office of Grants and Debarment
OSWER	Office of Solid Waste and Emergency Response
RFP	Request for proposal

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APPENDIX B: TABLE OF DELIVERABLES AND MEASURES

Strategy Number	Q2 FY 2011	Q3 FY 2011	Q4 FY 2011	Q1 FY 2012	Q2 FY 2012	Q3 FY 2012	Q4 FY 2012	Q1 FY2013 - FY 2014	Measures
Strategy 1: Increase Transparency & Efficiency in Providing Community-Based Grant Opportunities.	Brief EMC on draft options for improving grant delivery system.	Refine reform options based on EMC and community feedback.	Finalize reform options.	Begin implementation	Continue implementation	Continue implementation	Continue implementation.	Conduct evaluation and make necessary adjustments.	Reduction in regional workload; Increase in community grant applications.
Strategy 2: Improve Delivery of Technical Assistance to Communities.	Brief EMC on preliminary draft options.	Refine reform options based on EMC and community feedback.	Finalize reform options.	Begin drafting of grant or contract RFP(s).	Issue RFP(s).	RFP period closes.	Evaluate applications an make selections for service provider(s)	Monitor service provider(s), conduct evaluation, and make necessary adjustments.	Compliance with performance measures in grant/contract workplan(s); Degree of utilization by regions and Communities; Geographic distribution of outreach activities.
Strategy 3: Strengthen Grants Training for Communities.	Complete development of draft umbrella and environmental justice on-line training.	Obtain community & EPA feedback; initiate program-specific trainings.	Evaluate feedback; continue to develop program-specific training.	Complete all training.	Roll-out training to communities.	Provide training.	Provide training.	Conduct evaluation of training and make necessary adjustments.	Community satisfaction as measured by customer feedback.
Strategy 4: Improve Community Awareness of Grant Competition Process.	Seek input from EPA grants community via regional/HQ websites.	Evaluate community feedback; Obtain EPA feedback.	Evaluate feedback; finalize competition tools.	Roll-out competition tools to communities.	Promote use of tools.	Promote use of tools.	Evaluation of effectiveness of tools.	Tools adjusted based on results of evaluation.	Number of, and participation in, webinars; Increase in applications from new organizations (OEJ).

Plan EJ 2014: Appendix, Implementation plans

Strategy Number	Q2 FY 2011	Q3 FY 2011	Q4 FY 2011	Q1 FY 2012	Q2 FY 2012	Q3 FY 2012	Q4 FY 2012	Q1 FY2013 - FY 2014	Measures
Strategy 5: Revise grant policies that are unduly restrictive.	Inform programs of temporary revised version of Delegation 1-86.			Issue final revised version of Delegation 1-86.				Assess need for additional changes to delegation and make adjustments as necessary.	Increase in number of single-statute awards.
Strategy 5: Revise grant policies that are unduly restrictive.	Draft policy to simplify indirect cost rules; solicit feedback on changes to other policies.	Issue draft revision to indirect cost policies and other identified policies.	Issue final revised indirect cost rate policy/other revised policies.	Implement.	Continue to implement.	Continue to implement.	Continue to implement.	Conduct evaluation and make necessary adjustments.	Number of communities that take advantage of simplified indirect cost rates.
Strategy 6: Encourage OEJ-OGC/ORC-Program Office Dialogue on Community-Based Grant Issues.	Hold kick-off meeting to clarify roles and responsibilities for eligibility reviews.	Second quarterly meeting.	Quarterly meeting.	Quarterly meeting.	Quarterly meeting.	Quarterly meeting.	Quarterly meeting.	Conduct evaluation and make necessary adjustments.	Increase in timeliness of Program Office/ OGC/ORC eligibility reviews.
Strategy 6: Encourage OEJ-OGC/ORC –Program Office Dialogue on Community-Based Grant Issues.	Schedule for issuance of OGC guidance on the scope of existing grant authorities to be determined.								Reduction in number of legally ineligible grant applications.
Strategy 7: Improve Timeliness of Brownfields Grant Awards.	Develop draft approach.	Consult with HQ/ Regional Program & Grants Offices.	Finalize strategy and begin to implement.	Implement.	Continue to implement.	Continue to implement.	Continue to implement.	Conduct evaluation and make necessary adjustments.	Reduction in award times across grants offices.

For more information on Plan EJ 2014, visit the U.S. Environmental Protection Agency's Office of Environmental Justice website at: http://www.epa.gov/environmentaljustice/plan-ej/