



OFFICE OF INSPECTOR GENERAL

Catalyst for Improving the Environment

Evaluation Report

Voluntary Programs Could Benefit from Internal Policy Controls and a Systematic Management Approach

Report No. 2007-P-00041

September 25, 2007



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Abbreviations

EPA	U.S. Environmental Protection Agency
IAC	Innovation Action Council
OAR	Office of Air and Radiation
OIG	Office of Inspector General
OPEI	Office of Policy, Economics, and Innovation
OPPTS	Office of Prevention, Pesticides, and Toxic Substances

Cover Illustrations: Logos of selected EPA voluntary programs (from EPA Website)



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

We developed this report to identify current voluntary program management challenges. Our goal was to determine whether (1) the U.S. Environmental Protection Agency (EPA) has consistent Agency-wide policies that govern voluntary programs; (2) EPA's definitions of voluntary programs are understood by its staff and the public; and (3) EPA has the necessary processes to consistently develop, test, and review these programs.

Background

EPA increasingly relies on voluntary programs as tools for protecting the environment. EPA's 54 headquarters voluntary programs are diverse, reportedly providing a variety of benefits to several different customer groups, including some non-governmental organizations and the public.

For further information, contact our Office of Congressional and Public Liaison at (202) 566-2391.

To view the full report, click on the following link:
www.epa.gov/oig/reports/2007/20070925-2007-P-00041.pdf

Voluntary Programs Could Benefit from Internal Policy Controls and a Systematic Management Approach

What We Found

EPA has no Agency-wide policies that require voluntary programs to collect comparable data or conduct regular program evaluations. Without a consistent set of policies, EPA cannot determine the overall environmental impact of its voluntary programs. EPA lacks internal controls that outline specific ways to determine the success or failure of EPA's overall voluntary program effort. As a result, EPA cannot determine which voluntary programs are succeeding or failing. EPA also cannot determine which programs should serve as models for future program development.

EPA program offices have difficulty applying the current voluntary program definitions. This is because the scope of EPA's voluntary program definitions has changed drastically in the last 4 years. Depending on the source, the number of EPA voluntary programs varies between 54 and 133. However, the actual number of voluntary programs has not significantly changed. Instead, changes to program definitions simply expanded the scope of the populations. This problem can confuse EPA staff, participants, and the public.

EPA does not have a system to develop, test, and market new programs. EPA also lacks a system to evaluate existing programs, and may benefit from adopting a research and development model. Without a consistent management system, EPA cannot ensure that programs have the necessary elements to demonstrate their impact. Further, EPA lacks a systematic method to design, evaluate, and model programs that are effective at achieving environmental results.

What We Recommend

We recommend that the Deputy Administrator provide the Associate Administrator for the Office of Policy, Economics, and Innovation with the authority to develop, implement, and oversee mandatory Agency-wide management policies for voluntary programs. Further, those mandatory policies should implement a systematic management approach similar to a research and development model, and develop specific definitions or criteria that outline the general intent and function for the groups or categories of EPA voluntary programs that are currently implemented.

Agency respondents generally concurred with our recommendations. However, we remain uncertain exactly how the Agency plans to address and resolve each of our individual recommendations. We therefore consider our report recommendations to be open and unresolved.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

September 25, 2007

MEMORANDUM

SUBJECT: Voluntary Programs Could Benefit from Internal Policy Controls
and a Systematic Management Approach
Report No. 2007-P-00041

FROM: Wade T. Najjum
Assistant Inspector General for Program Evaluation

A handwritten signature in black ink, appearing to read "Wade T. Najjum", is written over the printed name.

TO: Marcus C. Peacock
Deputy Administrator

This is our report on the internal policy controls of the U.S. Environmental Protection Agency's (EPA's) voluntary programs, conducted by EPA's Office of Inspector General (OIG). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established evaluation resolution procedures.

The estimated cost of this report – calculated by multiplying the project's staff days by the applicable daily full cost billing rates in effect at the time – is \$135,649.

Action Required

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 90 calendar days. You should include a corrective action plan for agreed upon actions, including milestone dates. We have no objections to the further release of this report to the public. This report will be available at <http://www.epa.gov/oig>.

If you or your staff has any questions regarding this report, please contact me at 202-566-0827 or najjum.wade@epa.gov; or Jeffrey Harris, Product Line Director, at 202-566-0831 or harris.jeffrey@epa.gov.

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Chapter 1

Introduction

Purpose

We developed this report to identify current management challenges with the U.S. Environmental Protection Agency's (EPA's) voluntary programs. Our goal was to determine whether:

- (1) EPA has consistent Agency-wide policies that govern voluntary programs,
- (2) EPA's definitions of voluntary programs are understood by its staff and the public, and
- (3) EPA has the necessary processes to consistently develop, test, and review these programs.

Background

Until 2004, EPA had not attempted to formally supervise or direct its overall voluntary program effort. Program offices developed and ran voluntary programs on their own. In 2004, EPA began to implement some changes to how it managed voluntary programs. Between April 2004 and June 2004, then Acting Deputy Administrator Stephen Johnson issued two policy memoranda that outlined some changes to voluntary program management (Appendix A). These memoranda instructed the Innovation Action Council¹ (IAC) and the Office of Policy, Economics, and Innovation (OPEI) to make three general changes. They were to review programs; provide coordination and networking assistance; and develop guidance documents to improve program design, measurement, and "brand management" which relates to marketing these types of programs. At the same time, the IAC and OPEI began to revise their approach to voluntary and stewardship programs. These revisions included changes to the names, definitions, and scope of these types of programs.

Noteworthy Achievements

EPA increasingly relies on voluntary programs as tools for protecting the environment. EPA's 54 headquarters voluntary programs are very diverse. They reportedly provide a variety of benefits to several different customer groups, including some non-governmental organizations and the public. According to

¹ Established in 1996, the IAC is composed of EPA's top career executives, and has overall responsibility for formulating and advancing the Agency's innovation agenda. The mission of the IAC is to develop and promote innovative approaches to addressing increasingly complex environmental challenges.

EPA, voluntary programs achieve cost savings and energy conservation, and provide public recognition and technical assistance. There have been more than 11,000 participants from all types of industries, local and State governments, and nonprofit organizations. The general public has saved nearly \$6 billion, conserved 603 million gallons of water, and saved nearly 770 trillion British Thermal Units of Energy. Reported program outcomes also include reducing more than 150,000 tons of nitrogen oxide and more than 288,000 tons of sulfur dioxide.

Scope and Methodology

We reviewed and assessed EPA's guidance documents and publications related to voluntary programs, stewardship opportunities, partnership programs, and innovation activities. We analyzed internal memoranda and other Agency documents related to voluntary program management.

Previous OIG reports in this topic area include: Report No. 2005-P-00007, *Ongoing Management Improvements and Further Evaluation Vital to EPA Stewardship and Voluntary Programs*, February 17, 2005; and Report No. 2007-P-00003, *Partnership Programs May Expand EPA's Influence*, November 14, 2006. We also reviewed data collected from our 2006 report as it related to the findings discussed in this report.

We performed our evaluation between October 2006 and April 2007 in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. We reviewed management controls of the Agency-wide guidance regarding designing and measuring voluntary programs.

Chapter 2

Voluntary Programs Need Stronger Internal Policy Controls and a Systematic Management Approach

EPA does not have uniform implementation policies that allow staff to identify a consistent population of voluntary programs or determine whether these programs are achieving their overall goals. EPA does not have Agency-wide policies that standardize management processes, require collection of consistent and reliable data, and apply uniform operational guidelines that allow for comparative evaluation. Nor has EPA developed specific definitions that help EPA staff to categorize or identify these diverse voluntary programs. Finally, EPA has not implemented a systematic process to develop, test, and market voluntary programs, or to regularly evaluate the impact of these programs on the environment. As a result, EPA cannot consistently identify its voluntary program population; determine the broad environmental impact of its voluntary program effort; or systematically design, evaluate, and model programs that are effective at achieving environmental results.

Overall Voluntary Program Effort Lacks Strong Internal Controls

No program office or committee has been authorized to develop consistent Agency-wide operational policies for voluntary programs. In 2004, then Acting Deputy Administrator Johnson's two policy memoranda only provided OPEI with the authority to conduct program coordination, provide networking assistance, and develop three specific guidance documents (Appendix A). However, he did not authorize OPEI to develop management controls necessary to collect uniform data or compare programs so that best practices could be shared across the organization. This lack of management authority presents a key challenge to effectively implementing this group of programs.

OPEI has developed all three guidance documents and told us they have engaged in coordination activities. OPEI also informed us that they offer regular training courses for voluntary program managers. However, these three guidance documents and OPEI's limited coordination efforts do not comprise an adequate management framework. EPA still lacks internal controls that govern program initiation, require specific data collection, and outline criteria-based evaluation methods to determine the success or failure of EPA's overall voluntary program effort. As a result, EPA cannot determine which voluntary programs are succeeding, which are failing, and which should serve as models for future program development.

Voluntary Programs Need More Specific Definitions

EPA’s voluntary program definition has evolved over the last several years. However, EPA has yet to develop specific criteria that allow for consistent identification of different types of voluntary programs. The first voluntary program definition we identified was included in the Deputy Administrator Johnson’s 2004 Voluntary Program Charter (Appendix A). A new definition was provided in 2005, and was revised again in 2006. These definition changes are shown in Table 2.1 below.

Table 2.1 Changes in Voluntary Program Definitions

Year	Voluntary Program Definition
2004 ^a	Programs designed to motivate people and organizations to take actions, not required by regulation, that benefit the environment.
2005 ^b	A voluntary program meets four general criteria: <ul style="list-style-type: none"> • Voluntary; • Significant, two-way engagement with its members; • Requires action on the part of the stakeholder; and • In active operation.
2006 ^c	A voluntary “partnership” program is: <ul style="list-style-type: none"> • designed to proactively target and motivate external parties to take specific environmental action steps; • does not compel by law external parties to take environmental action steps; and • [one where] EPA is responsible for providing leadership and decision-making authority.

^a Source: *EPA Charter for Coordinating and Managing EPA’s Voluntary Programs*, June 28, 2004.

^b Source: EPA, *Everyday Choices: Opportunities for Environmental Stewardship*, Technical Report, November 2005.

^c Source: EPA, *OPEI Definition of EPA Partnership Programs*, December 2006.

The changes to voluntary program definitions, scopes, and counts have been challenging to track. As a result of these changes, EPA’s voluntary program population has reportedly increased rapidly over the last few years. In December 2003, EPA reported about 75 *voluntary programs*. Just 2 years later, in November 2005, EPA reported 133 *voluntary partnership programs*. OPEI informed us that the number of programs did not increase significantly during that timeframe. However, they told us that changes to the definitions simply expanded the scope of the populations.

The most significant change we found was in how EPA uses the term *stewardship*. Over the last 3 years, the scope of this term has expanded from 6 programs to over 400 *stewardship opportunities*. Now, these efforts encompass the majority of EPA’s voluntary efforts. To better make sense of how the definitions and scope of these programs have changed since 2004, see Table 2.2. As shown in this table, the program type, description, and number of programs depend on which EPA organization identifies the population.

Table 2.2 Changes in the Scope of EPA’s Voluntary Program Effort

Year	Program Type	Description	Number of Programs	Population Identified by:
2004 ^a	Stewardship Programs	A subset of EPA’s larger Voluntary Program effort	6	OPEI
	Voluntary Programs ¹	The entire population of programs engaged in voluntary efforts.	75	OPEI
2005 ^b	Stewardship Opportunities ¹	Programs that help all parts of society actively take responsibility to improve environmental quality and achieve sustainable results.	Over 400	IAC
	Voluntary “Partnership” Programs ¹	Programs that make up a significant portion of EPA’s overall Stewardship effort.	133	IAC

^a Source: EPA, *2003 Inventory of Voluntary Programs*.

^b Source: EPA, *Everyday Choices: Opportunities for Environmental Stewardship*, Technical Report, November 2005.

¹ This population includes Voluntary Programs operated by EPA regional offices.

While the population inconsistencies discussed above are confusing, we also found a more significant issue of concern. In January 2006, we asked each EPA program office to provide a list of headquarters-based, national-scope voluntary programs that they operated.² Our list of 54 programs included the National Non-Point Source (NPS) Pollution Prevention program. This \$209 million program is considered by some EPA offices to be a “grant” program, and thought of by other offices as a “voluntary” program. This program meets all of the criteria outlined in the 2006 voluntary program definition. However, a key aspect of the Non-Point Source program is to give grants to States to operate water quality programs. Regardless of the final determination, this situation demonstrates that EPA’s current voluntary program definition is overly vague. As a result, Agency staff is unsure whether a \$209 million program is part of its overall voluntary program effort.

We are also concerned about the ability of EPA program offices to consistently interpret and apply the current voluntary program definitions. During our information collection in January 2006, we found that most program offices were unclear about what a voluntary program was. When we asked for a list of their national-scope voluntary programs, the majority of the program offices asked, “How do you define a voluntary program?”

We have determined that the lack of specific program definitions is the cause of these problems. Current Agency-wide definitions are too broad and lead to inconsistent application at the program office level. If the overall intent of a program is to provide grant funds, then there should be criteria that keep this type

² Report No. 2007-P-00003, *Partnership Programs May Expand EPA’s Influence*, November 14, 2006.

of program from being confused with other types of voluntary programs. While a single, Agency-wide definition may not be feasible, EPA should develop additional criteria for groups or categories of voluntary programs. These definitions should better describe the intent and function of these broader program types. Also, EPA must improve the way it communicates those definitions and criteria to each program office that operates voluntary programs.

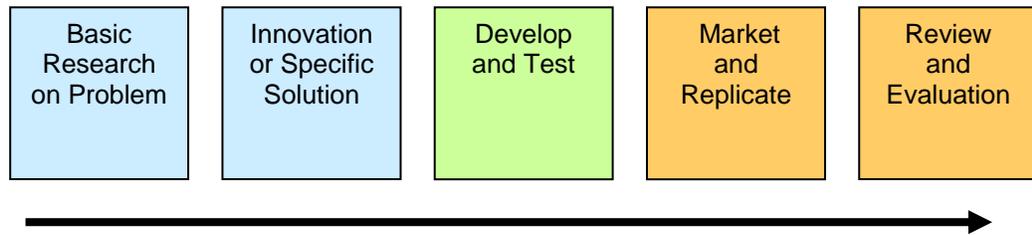
Identifying specific criteria for sets of voluntary programs can facilitate evaluation and management improvements. Improvements can include sharing best practices across programs that have similar functions. It can also identify effective management processes and determining which types of programs are most applicable to solving certain environmental problems. Separating voluntary programs into general program types is not new. This approach has already been used in the November 2005 EPA report, *Everyday Choices: Opportunities for Environmental Stewardship*. In Appendix F of that document's Technical Report, partnership programs were separated into three general categories: Voluntary Programs (VP), Grant programs (G), and Information (I) programs. We believe that specific criteria that identify program "types" will help both EPA and its voluntary program participants to consistently identify these broad sets of programs. Further, specific criteria will also help program offices consistently determine how and when policy and guidance documents apply to their individual programs.

EPA Could Apply a Research and Development Approach

EPA's current voluntary program management approach seeks to avoid top-down planning and directives. In the context of voluntary programs, this approach has merit. Standardized management processes may not necessarily stimulate grass-roots creativity and innovative problem solving. EPA encourages program offices to design new voluntary programs as they see fit. EPA assumes that those programs that are soundly designed will thrive, while poorly planned ones will soon wither and die.

Our concern is that, regardless of a program's eventual fate, this approach provides very few checks and balances. Without policies and oversight, we are not sure how EPA will ensure that programs have the necessary elements to demonstrate their impact. EPA must find a balance between the creativity inherent to voluntary program development and the need to demonstrate their outcomes. We believe that this effort can benefit by adopting a research and development management model like the one outlined in Figure 2.1 below.

Figure 2.1: Research and Development Model



Source: Adapted from National Institute of Standards and Technology (NIST) research model.

The creation of a voluntary program is similar to the research and development of a marketable product. A voluntary program or innovation must be first conceived, developed, tested, and marketed. Finally, the program must be reviewed to determine if it is performing successfully and if participants are “consuming” the product. This management approach does not require voluntary programs to conform to a rigid set of design criteria. Considering the current number of EPA voluntary programs, the Agency has been successful at creating a wide variety of voluntary solutions to environmental problems. What EPA lacks is a systematic process. EPA needs a system to develop, test, and market new programs, as well as evaluate existing programs. Otherwise, EPA cannot determine which voluntary programs are succeeding, which are failing, and which should serve as models for future program development. The application of this kind of management approach should help EPA retain flexibility, while still ensuring that voluntary programs include the key elements necessary for comparative evaluation.

Conclusions

EPA has not provided a program office with the authority to develop Agency-wide management policies that allow for comparative program evaluation. Also, EPA does not have sufficient voluntary program definitions. Current definitions are inconsistently applied, and EPA cannot verify which programs are included or excluded from its voluntary program population. Finally, EPA has not implemented a systematic management approach for developing new programs or for evaluating existing programs. As a result, EPA cannot consistently identify its voluntary program population; determine the overall environmental impact of its broader voluntary program effort; or systematically design, evaluate, and model programs that are effective at achieving environmental results.

Recommendations

To correct these problems, we recommend that the Deputy Administrator:

- 2-1 Provide the Associate Administrator for OPEI with the authority to develop, implement, and oversee mandatory Agency-wide management policies for voluntary programs.
- 2-2 As a part of the mandatory policies in Recommendation 2-1 above, implement a voluntary program management approach similar to a research and development model.
- 2-3 As a part of the mandatory policies in Recommendation 2-1 above, develop specific definitions or criteria that outline the general intent and function for the groups or categories of EPA voluntary programs that are currently implemented.

Agency Responses and OIG Evaluation

EPA concurred with the report in general. However, we remain uncertain exactly how the Agency plans to address and resolve each of our individual recommendations. We therefore consider our report recommendations to be open and unresolved based on our analysis of the Agency's comments. In its response to our final report, EPA should outline how each recommendation will be addressed. EPA should also develop a corrective action plan for agreed upon actions that includes milestone dates for accomplishing each of those actions.

Further, EPA indicated that it planned to leave the creation of the new internal control policies and programmatic oversight to the IAC. The IAC is not the appropriate designee for this responsibility. The actions described in our recommendations are better implemented by a program office that can have daily rather than just periodic involvement with the issues. OPEI has been charged with other aspects of voluntary program management. Therefore, it is appropriate for the Deputy Administrator to provide OPEI with the authority to develop, implement and oversee these mandatory policies. We have revised our recommendations accordingly. We have also incorporated technical corrections and clarifications from EPA's response as appropriate.

In addition to OPEI, the Office of Air and Radiation and the Office of Prevention, Pesticides, and Toxic Substances also responded to our report. For the complete Agency responses from all three offices, see Appendix B. For the OIG's evaluation of the Agency responses, see Appendix C.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
2-1	8	Provide the Associate Administrator for OPEI with the authority to develop, implement, and oversee mandatory Agency-wide management policies for voluntary programs.	U	Deputy Administrator			
2-2	8	As a part of the mandatory policies in Recommendation 2-1 above, implement a voluntary program management approach similar to a research and development model.	U	Deputy Administrator			
2-3	8	As a part of the mandatory policies in Recommendation 2-1 above, develop specific definitions or criteria that outline the general intent and function for the groups or categories of EPA voluntary programs that are currently implemented.	U	Deputy Administrator			

¹ O = recommendation is open with agreed-to corrective actions pending;
 C = recommendation is closed with all agreed-to actions completed;
 U = recommendation is undecided with resolution efforts in progress

EPA-Wide Voluntary Program Policy

Provided below are the two policy memoranda published by the Acting Deputy Administrator Stephen Johnson. These two documents represent the total Agency-wide policy that has been developed for these programs to date.

Management of EPA's Voluntary Programs (issued April 21, 2004)

This memorandum outlines a new management process for EPA's voluntary programs that builds on the successful efforts we have underway and continues a collaborative approach to deliver significant environmental results. I am establishing the Office of Policy, Economics, and Innovation (OPEI) as the lead office for this new initiative and outlining what you can expect over the next few months. I encourage you to share this information with your key staff that work on voluntary program issues and to work with me and OPEI to make this effort successful.

EPA has established that voluntary programs can deliver significant environmental results when well designed and managed. As our use of this approach expands it is important to put the necessary processes in place so we can learn from the lessons of the past, meet the needs of our stakeholders, and use available resources effectively.

The Innovation Action Council (IAC), through a six-month project, has recommended a set of management improvements that will strengthen individual programs and improve the strategic management of the full set of programs across the Agency. The recommendations are in three areas: better coordination across all programs, enhanced accountability for sound program design, and more strategic management of programs. The initial work includes:

- An improved support network for voluntary program managers;
- A set of guidelines on program design, brand management, and measurement; and
- An Agency-wide notification process for new or expanding programs.

To make this new management process work, I ask the following groups to take on the responsibilities outlined below.

- OPEI will lead this initiative -and will set up a small voluntary programs coordination staff. OPEI will also chair an Agency-wide workgroup, comprising representatives from each program and region, to design the new processes and ensure successful implementation.
- The IAC will provide oversight of voluntary program management - giving final approval to the new guidelines and processes and, ultimately, ensuring accountability and implementation of the recommended changes.

- Representatives from each voluntary program will participate in a Voluntary Program Network, a supportive forum for sharing best practices and lessons learned.

And I am hopeful that we can achieve two important near-term milestones:

- An Agency-wide notification process in place by April 30, 2004.
- IAC-approved guidelines addressing improvements in design, brand management, and measurement in place by September 2004.

As we shift to this new management approach for the voluntary programs, we will be mindful that our primary goal is to enhance the value of these important programs in achieving environmental results. We want voluntary programs that deliver environmental gains with measured and reported results recognized by the public, and we want programs that appeal to a growing number of participants, that are easy to understand and have well-designed operating procedures. I believe we can strengthen the strategic management of voluntary programs without stifling the new ideas and creative forces associated with start-ups of new voluntary activities. I encourage regions and program offices to continue developing new programs. I believe these activities will be strengthened by our proposed improvements to EPA-wide management of voluntary programs.

The Administrator is committed to collaborative processes to drive improvements in environmental protection. I commend the Innovation Action Council for its leadership in identifying actions we can take right away to enhance the effectiveness of EPA voluntary programs by making them more customer-focused and results oriented. The set of activities we are launching today is an important step that can lead to more strategic use of voluntary programs to solve environmental problems.

Charter for Coordinating and Managing EPA's Voluntary Programs (issued June 28, 2004)

PURPOSE

Voluntary programs can deliver significant environmental results when well designed and managed. Based on analysis and recommendations from the Innovation Action Council, the Office of the Administrator requested that the effectiveness of EPA voluntary programs (individually and collectively across the Agency) be enhanced by making them more customer focused and results-oriented. Improvements are needed in three areas: better coordination across all programs, enhanced accountability for sound program design and management, and more strategic management of programs.

DEFINITION AND SCOPE

Voluntary programs at EPA encompass a breadth of diverse activities, from whole organizational units that use voluntary approaches to accomplish their mission (e.g., indoor air, pollution prevention) to small partnership projects created by individual staff. There is a wide variety in the design of voluntary programs, targeted participants, and types of environmental issues addressed. This Charter uses a broad definition of voluntary programs, "programs designed to motivate people and organizations to take actions not required by regulation that benefit the environment." These voluntary programs may achieve their goals in various ways, the use of market forces, or by providing recognition or other incentives. They may encourage actions that go beyond compliance with environmental requirements, or provide an alternative way to achieve a regulatory objective.

ROLES AND RESPONSIBILITIES

The Office of Policy, Economics, and Innovation (OPEI) is designated as the lead office. The OPEI voluntary program coordinator will provide EPA-wide services including a web site, marketing, reports about results and other support services for voluntary programs; staff the voluntary program network and Agency-wide workgroup; manage a simple notification process for new and expanding programs; and support evaluations and policy studies that can advance the use of voluntary programs to accomplish EPA's mission. Each EPA Headquarters and Regional Office will design and operate voluntary programs consistent with EPA-wide guidelines, notify other EPA organizations about new and expanding programs, and participate in the voluntary program network and workgroup.

Intra-agency coordination will be accomplished through:

- voluntary programs network for managers and staff of voluntary programs in Headquarters and Regions. The network will provide a communication link and a supportive forum for sharing best practices and lessons learned. Representatives from each voluntary program are expected to participate in the network, via electronic communications (e.g., a list-serve) and teleconference calls, as needed.
- a voluntary programs workgroup, comprising senior staff representatives from each AA-ship and appropriate Regional Offices (e.g., the DRAs may agree to use a lead Region to represent Regional views). The workgroup is responsible for drafting EPA voluntary program guidelines and related policies, and helping design and operate effective cross-agency systems that support voluntary programs (e.g., EPA-wide notification process on new or expanding programs). Each workgroup member will represent the views of their Assistant or Regional Administrator in workgroup discussions, and will also serve as a resource for other voluntary programs in sharing information and lessons learned.

- the Innovation Action Council (IAC) is responsible for oversight of voluntary program management. The IAC will give final approval to the new guidelines and processes and ultimately ensure accountability and implementation of the recommended changes. Using a Subcommittee comprised of Headquarters and Regional representatives, the IAC will ensure the quality of voluntary program design and oversee the management of the EPA brand associated with voluntary programs and measurement of results. Issues will be elevated, as needed, to the Deputy Administrator for resolution.

ANNUAL REPORT TO DEPUTY ADMINISTRATOR

OPEI, in consultation with the IAC, will prepare a concise report to the Deputy Administrator at the end of each calendar year that highlights accomplishments, provide a status report on management processes, and identify any management issues that need attention. Each year, the Deputy Administrator will determine if any new policy directions or additional management improvements are needed. The first year's focus will include; an improved means to support voluntary program managers and staff; new Agency guidelines on program design, brand management and measurement; and, operation of an Agency-wide notification process for new or expanding programs. After five years, a major internal evaluation will be conducted on EPA's management of voluntary programs.

DURATION

Coordination of EPA's voluntary programs will be needed on a continuing basis as determined by the Administrator or Deputy Administrator. This Charter will be reviewed five years after approval.

Agency Responses

MEMORANDUM

Subject: OPEI Comments on the OIG's Evaluation Report "Voluntary Programs Could Benefit from Internal Policy Controls and a Systematic Management Approach"

From: Brian F. Mannix
Associate Administrator

To: Jeffrey Harris, Director
Program Evaluation, Cross-Media Issues
Office of the Inspector General

Thank you for the opportunity to provide comments on the Office of the Inspector General's Evaluation Report "Voluntary Programs Could Benefit from Internal Policy Controls and a Systematic Management Approach" (Assignment No. 2007-00285). This memo supplements the comments made in our April 2007 response to your Discussion Draft, which we have attached for your reference.

General Comments

We continue to agree with your conclusion that stronger management controls are needed for voluntary/partnership programs and that they should be subject to more strategic evaluation. The history of these programs has been characterized by a development period in which we encouraged innovation and creative approaches to solve environmental problems that were not being addressed by regulation. The need for more rigorous management systems has become apparent more recently, as the use of partnership approaches has grown.

Without weakening the recommendation for further action, we believe it is important (particularly for external readers) that the final report recognize the steps that have already been taken in this direction. Therefore, we are providing a one page summary of the progress to date that we suggest be used as an appendix to your report (see Appendix A).

Similarly, we think it is important to appropriately recognize the evaluations that have already been conducted for these programs (for example, through OMB's PART process). Appendix A describes some of the results of these evaluations.

We believe it is important to avoid any implication that the recommendation for greater management controls is intended as an indictment of partnership programs. Any major activity in the Agency, whether regulatory, educational, grant-supported or compliance-oriented, should be subject to oversight and evaluation. Once all Agency programs, regulatory or otherwise, are subject to comparable systems, we can be sure we are properly managing agency resources and fulfilling our public trust.

We note that your recommendations for strengthening the management of partnership programs do not address who should have the responsibility for creating this next level of controls (leaving that decision to the Deputy Administrator). We believe that the Innovation Action Council (IAC) remains well-positioned to perform this role, as it was in 2004 when then Deputy Administrator Stephen Johnson chartered the IAC to play the lead role in the agency-wide management system for these programs – leading to the actions described in Appendix A. As EPA moves to a more mature system for strategically managing all Agency programs, including partnership programs, the IAC will fill the critical function of developing evaluation guidelines and a priority-setting scheme for individual program assessment. The IAC is also well-equipped to explore some of the cross-cutting policy questions related to partnership programs.

Another area pointed out in your report pertains to the evolving definition of partnership programs. We recognize that historically the definitions have varied to some extent; however, we believe that progress has been made in creating a meaningful definition that works for purposes of the IAC's coordination activities. We are working to increase awareness of this definition across the Agency, as well as creating further categories that will make it easier to determine the types of programs. We do wish to reiterate, however, that because the programs are so varied, it is impossible to create a “bright line” definition that can be used for all purposes and leaves no room for judgment in individual cases. Further, we believe it is ultimately unhelpful to focus undue energy on artificial categories and criteria, when we should instead be emphasizing the best management strategies and practices applicable to all types of Agency programs.

With regard to your recommendation concerning the use of an “R&D model” for partnership programs, we believe many elements of an R&D model align with the *Guidelines for Designing EPA Partnership Programs* and would be helpful in the management of these programs. This includes the concepts of pilot testing and evaluating program concepts before wider program rollout. We also believe such a model recognizes a key strategic advantage of the partnership program approach: the ability to relatively quickly modify program design elements or transfer successful program design elements from one program to another. This development process links back to the usefulness of our notification process, which enables Agency-wide information sharing, collaboration, and innovation transfers for new partnership programs.

Finally, while we agree in general with the need to create a stronger evaluation framework we wish to again emphasize that one size does not fit all and that no single set of uniform criteria will apply to all partnership programs. These evaluations may need to be performed in several unique contexts, such as the developmental stage of the program or the relationship of the partnership activity to the regulatory program that it may augment. Furthermore, evaluation

should be planned and designed looking at the entire suite of tools (not just partnership programs) and the policy choices facing the Agency.

Specific Comments

Following are specific corrections that we would like to see in the final report.

- Page 1 states we were directed to “develop some guidance documents to improve program design, measurement, and using the EPA logo as a corporate-style brand,” Our charge was broader than use of the EPA logo -- it was to work with partnership programs to ensure stronger and more strategic marketing of EPA partnership programs.
- Page 3 states we have developed two guidance documents. We have developed all three planned documents - Design, Performance Measurement and Program Marketing.
- Page 5, Table 2.2 - Changes in Scope of EPA’s Voluntary Program Effort.
 - 2004 Voluntary Programs description—we suggest stating that this population includes regional programs.
 - 2005 Voluntary Programs description— includes regionally-based efforts.
 - When regionally-based programs are removed from the 2004 and 2005 lists, the number of “voluntary programs” does not change significantly from year to year.
- Page 6 states: “As shown by the example above, if the overall intent of a program is to provide grant funds, then there should be criteria that keeps this type of program from being confused with programs that recruit members or ones that provide information and recognition.” EPA has had language in our definition since 2003 that excludes grants programs and information-based programs from the partnership program list. The difficulty appears to be that when programs are asked, they do not rely on the existing definition.

Thank you again for the opportunity to comment on this report. We would be happy to meet with you at any time to discuss the comments and hope that we can continue to work together to make these programs as effective and efficient as possible.

Attachment – OPEI’s May 2007 comments on the Voluntary Programs Internal Controls Discussion Draft

Appendix A – EPA Partnership Programs – Accomplishments and Progress to Date

APPENDIX A

EPA Partnership Programs -- Accomplishments and Progress to Date

The 2004 Agency Charter for Coordinating and Managing EPA's Voluntary Programs, signed by then Deputy Administrator, Stephen Johnson, specified that the programs be overseen and directed by the Agency's Innovations Action Council (IAC) and charged EPA's Office of Policy Economics and Innovation (OPEI) with improving coordination across all programs, enhancing accountability for sound program design and management, and guiding more strategic management of programs. In fulfilling that mandate, OPEI:

- Established an Agency Notification process for any new or expanding voluntary/partnership program, a cross-Agency Innovations Action Council Workgroup of partnership program managers, and a Network of nearly 400 EPA partnership program managers and staff.
- Developed Guidelines for Designing EPA Partnership Programs, Guidelines for Measuring the Performance of Partnership Programs, and Guidelines for Marketing Partnership Programs.
- Developed a Partnership Program listserv and Partners for the Environment internet and intranet sites to enhance communication.
- Trained nearly 100 partnership program staff on partnership program best practices
- Is now developing a categorization scheme for partnership programs.
- Is developing guidelines for evaluating these programs.
- Consults on a daily basis with EPA partnership programs to advise them on policy requirements and state-of-the art tools and procedures for operating their programs.

EPA's Program Offices continue to take measures to assure that they strategically manage the creation, management, and "sunsetting" of partnership programs. For example Program Office managers have:

- Created programs to complement or precede rules such as the National Clean Diesel Campaign, Design for the Environment's Safer Detergent Stewardship Initiative, and High Production Volume Chemicals Challenge Program.
- Phased out or terminated programs as needs evolved, such as, ClimateWise, Water Alliance for Voluntary Efficiency, and Green Lights.
- "Privatized" or turned over to the private sector programs like Hospitals for a Healthy Environment.

A wide variety of evaluations has been performed on partnership programs and they demonstrate that the programs are effective and achieving environmental results.

- Most EPA Partnership Programs have been reviewed through the OMB PART process. They have generally scored in the top third among all PART-reviewed EPA programs -- regulatory, grant, or otherwise.
- Please also note that in-depth evaluations have been conducted on these and other EPA Partnership Programs by the Inspector General, the General Accounting Office, Harvard's Kennedy School of Government, the Agency's Evaluation Support Division (through the Program Evaluation Competition), and others.

MEMORANDUM

SUBJECT: Office of Air and Radiation Comments on the OIG's July 16, 2007 Draft Report entitled "Voluntary Programs Could Benefit from Internal Controls and a Systematic Management Approach"
Assignment Number: 2007-000285

FROM: Elizabeth Craig
Deputy Assistant Administrator

TO: Jeffrey Harris
Director of Program Evaluation, Special Studies
Office of Inspector General

The Office of Air and Radiation (OAR) would like to provide the following comments regarding the Office of the Inspector General (OIG) Draft Report entitled "Voluntary Programs Could Benefit from Internal Controls and a Systematic Management Approach".

- The report should acknowledge, both in the summary and body, that certain non-regulatory EPA programs track results consistently and are demonstrating strong performance. While there may be no systematic means to aggregate and evaluate results across all non-regulatory programs at the Agency level, that may be attributable to the wide variation in purpose, design, and method among programs collected artificially under a single, broad label, "voluntary."
- Chapter One, Background Discussion: As currently written, this section may be read to imply that the Agency initiated non-regulatory programs randomly or indiscriminately. In many cases, such programs are authorized under EPA's environmental statutes and may be properly viewed as products of the Agency's initiative in pursuing statutory goals through authorized means other than regulation.
- Chapter One, Noteworthy Accomplishments: This section creates the impression that non-regulatory programs address themselves only to businesses, non-profits, and governments. Many such programs direct themselves to the general population, making a measurable difference in reducing environmental risk through fostering change in citizen behavior.
- Chapter Two, Voluntary Programs Need More Specific Definitions: We agree with a tentative conclusion of this section:

"Agency-wide definition may not be feasible, EPA should develop additional criteria for groups and categories of voluntary programs that better describe the intent and function of these broader program types. Also, EPA must improve the way it communicates those definitions and criteria to each program office that operates voluntary programs."

- Chapter 2, EPA Could Apply a Research and Development Approach: OAR disagrees with the finding the EPA lacks a systematic process for developing and testing new programs and for evaluating existing voluntary programs. Many individual programs are tracking results, and thoughtfully considering adjustments to their programs based upon internal as well as external evaluations. Also, the PART (Performance Assessment Rating Tool) is designed to rate the effectiveness of federal programs government-wide, and it has already been applied to a number of non-regulatory programs.

Thank you for the opportunity to comment on this draft report on Voluntary programs. Should you have questions on these comments please contact Thomas E. Kelly, Director, Indoor Environments Division, at (202) 343-9444.

cc: Elizabeth A. Cotsworth, Director
Office of Radiation and Indoor Air

Thomas E. Kelly, Director
Indoor Environments Division

OIG Draft Report on the Internal Management Controls of Voluntary Programs

OPPT Comments 7/25/07

The Office of Inspector General's draft evaluation report called "Voluntary Programs Could Benefit from Internal Policy Controls and a Systematic Management Approach" (Assignment No. 2007-00285) contains the following recommendations for the Deputy Administrator:

- 1) Develop and implement Agency-wide management policies for voluntary programs.
- 2) Implement a voluntary program management approach similar to a research and development model.
- 3) Develop specific recommendations or criteria that outline the general intent and function for the groups or categories of EPA voluntary programs that are currently implemented.

OPPT has two overarching points about the report that we would like for OPEI to consider when responding to OIG. First, the recommendations put forth by the Partnership Programs Review Workgroup address the first recommendation for developing and implementing Agency-wide management policies for voluntary programs. Secondly, the research and development model referenced in OIG's second recommendation does not recognize the fact that the IAC recommends using a different approach, namely the logic model approach. The report states on page 7 "Without a system to develop, test, and market new systems, or evaluation existing programs, EPA cannot determine which voluntary programs are succeeding, which are failing, and which ones should serve as models for future program development." OPPT contends the logic model approach is a valid method for developing and evaluating programs.

OIG's Analysis of Agency Responses

Office of Policy, Economics, and Innovation (OPEI)

Section/ Page	OPEI Comment	OIG Response
General	<p>We continue to agree with your conclusion that stronger management controls are needed for voluntary/partnership programs and that they should be subject to more strategic evaluation. The history of these programs has been characterized by a development period in which we encouraged innovation and creative approaches to solve environmental problems that were not being addressed by regulation. The need for more rigorous management systems has become apparent more recently, as the use of partnership approaches has grown.</p> <p>Without weakening the recommendation for further action, we believe it is important (particularly for external readers) that the final report recognize the steps that have already been taken in this direction. Therefore, we are providing a one page summary of the progress to date that we suggest be used as an appendix to your report (see Appendix A).</p> <p>Similarly, we think it is important to appropriately recognize the evaluations that have already been conducted for these programs (for example, through OMB's PART process). Appendix A describes some of the results of these evaluations.</p> <p>We believe it is important to avoid any implication that the recommendation for greater management controls is intended as an indictment of partnership programs. Any major activity in the Agency, whether regulatory, educational, grant-supported or</p>	<p>OPEI concurs with the report in general. However, we remain uncertain exactly how the Agency plans to address and resolve each of our individual recommendations. We therefore consider our report recommendations to be open and unresolved based on our analysis of the Agency's comments.</p> <p>In its response to our final report, EPA should outline how each recommendation will be addressed. EPA should also develop a corrective action plan for agreed upon actions that include milestone dates for accomplishing each of those actions.</p> <p>The goal of this evaluation was to determine if EPA has consistent Agency-wide policies that govern the implementation, management and oversight of voluntary programs. While we understand the importance of external evaluations, our recommendations focus on the development and implementation of consistent internal policy controls.</p>

Section/ Page	OPEI Comment	OIG Response
	<p>compliance-oriented, should be subject to oversight and evaluation. Once all Agency programs, regulatory or otherwise, are subject to comparable systems, we can be sure we are properly managing agency resources and fulfilling our public trust.</p> <p>We note that your recommendations for strengthening the management of partnership programs do not address who should have the responsibility for creating this next level of controls (leaving that decision to the Deputy Administrator). We believe that the Innovation Action Council (IAC) remains well-positioned to perform this role, as it was in 2004 when then Deputy Administrator Stephen Johnson chartered the IAC to play the lead role in the agency-wide management system for these programs – leading to the actions described in Appendix A. As EPA moves to a more mature system for strategically managing <u>all</u> Agency programs, including partnership programs, the IAC will fill the critical function of developing evaluation guidelines and a priority-setting scheme for individual program assessment. The IAC is also well-equipped to explore some of the cross-cutting policy questions related to partnership programs.</p> <p>Another area pointed out in your report pertains to the evolving definition of partnership programs. We recognize that historically the definitions have varied to some extent; however, we believe that progress has been made in creating a meaningful definition that works for purposes of the IAC’s coordination activities. We are working to increase awareness of this definition across the Agency, as well as creating further categories that will make it easier to determine the types of programs. We do wish to reiterate, however, that because the programs are so varied, it is</p>	<p>We do not believe that the IAC is the appropriate designee for the responsibility of creating the additional controls. The actions described in our recommendations are better implemented by a program office that can have daily rather than just periodic involvement with the issues.</p> <p>OPEI has been charged with other aspects of voluntary program management. Therefore, it is appropriate for the Deputy Administrator to provide OPEI with the authority to develop, implement and oversee these mandatory policies.</p> <p>We understand that EPA’s Voluntary Program population is diverse and varied. However, we believe that inconsistent definitions hinder overall management and effectiveness of this program set.</p> <p>We do not recommend that EPA necessarily create a “bright line.” Rather, we recommend that EPA include some additional criteria in its existing definition to help program offices more accurately</p>

Section/ Page	OPEI Comment	OIG Response
	<p>impossible to create a “bright line” definition that can be used for all purposes and leaves no room for judgment in individual cases. Further, we believe it is ultimately unhelpful to focus undue energy on artificial categories and criteria, when we should instead be emphasizing the best management strategies and practices applicable to all types of Agency programs.</p> <p>With regard to your recommendation concerning the use of an “R&D model” for partnership programs, we believe many elements of an R&D model align with the <i>Guidelines for Designing EPA Partnership Programs</i> and would be helpful in the management of these programs. This includes the concepts of pilot testing and evaluating program concepts before wider program rollout. We also believe such a model recognizes a key strategic advantage of the partnership program approach: the ability to relatively quickly modify program design elements or transfer successful program design elements from one program to another. This development process links back to the usefulness of our notification process, which enables Agency-wide information sharing, collaboration, and innovation transfers for new partnership programs.</p> <p>Finally, while we agree in general with the need to create a stronger evaluation framework we wish to again emphasize that one size does not fit all and that no single set of uniform criteria will apply to all partnership programs. These evaluations may need to be performed in several unique contexts, such as the developmental stage of the program or the relationship of the partnership activity to the regulatory program that it may augment. Furthermore, evaluation should be planned and designed looking at the</p>	<p>and consistently categorize these programs. We believe creating definitions for appropriate categories of programs will enhance EPA’s ability to “...emphasiz[e] the best management strategies and practices....” Also, EPA needs to effectively communicate these definitions to program offices.</p> <p>We understand that the existing design guidelines help with piloting and initial testing of new voluntary programs. However, these guidelines do not sufficiently address the ongoing implementation and periodic evaluation necessary to ensure that existing programs continue operating effectively.</p> <p>Therefore, we recommend that OPEI develop a policy that incorporates this R&D model through both the development and implementation phases of a voluntary program’s lifecycle.</p> <p>This policy can be designed with enough flexibility to allow for periodic program evaluation while still recognizing the diversity of this broad program set.</p>

Section/ Page	OPEI Comment	OIG Response
	entire suite of tools (not just partnership programs) and the policy choices facing the Agency.	
Chapter 1, Page 1	Page 1 states we were directed to “develop some guidance documents to improve program design, measurement, and using the EPA logo as a corporate-style brand,” Our charge was broader than use of the EPA logo -- it was to work with partnership programs to ensure stronger and more strategic marketing of EPA partnership programs.	We changed the report in response to this comment.
Chapter 2, Page 3	Page 3 states we have developed two guidance documents. We have developed all three planned documents - Design, Performance Measurement and Program Marketing.	We changed the report in response to this comment.
Chapter 2, Page 5, Table 2.2	<p>Page 5, Table 2.2 - Changes in Scope of EPA’s Voluntary Program Effort.</p> <ul style="list-style-type: none"> • 2004 Voluntary Programs description— we suggest stating that this population includes regional programs. • 2005 Voluntary Programs description— includes regionally-based efforts. • When regionally-based programs are removed from the 2004 and 2005 lists, the number of “voluntary programs” does not change significantly from year to year. 	We added two additional footnotes to this table to indicate which program counts do and do not include regional programs.
Chapter 2, Page 6	Page 6 states: “As shown by the example above, if the overall intent of a program is to provide grant funds, then there should be criteria that keeps this type of program from being confused with programs that recruit members or ones that provide information and recognition.” EPA has had language in our definition since 2003 that excludes grants programs and information-based programs from the partnership program list. The difficulty appears to be that when programs are asked, they do not rely on the existing definition.	We believe that this issue is a clear example of why more specific definitions that outline the groups or categories of these programs need to be developed and effectively and consistently communicated to program offices.

Office of Air and Radiation (OAR)

Section/ Page	OAR Comment	OIG Response
General	The report should acknowledge, both in the summary and body, that certain non-regulatory EPA programs track results consistently and are demonstrating strong performance. While there may be no systematic means to aggregate and evaluate results across all non-regulatory programs at the Agency level, that may be attributable to the wide variation in purpose, design, and method among programs collected artificially under a single, broad label, “voluntary.”	We believe that we acknowledged EPA’s voluntary program results in the “Noteworthy Achievements” section of Chapter 1.
Chapter 1, Page 1	Chapter One, Background Discussion: As currently written, this section may be read to imply that the Agency initiated non-regulatory programs randomly or indiscriminately. In many cases, such programs are authorized under EPA’s environmental statutes and may be properly viewed as products of the Agency’s initiative in pursuing statutory goals through authorized means other than regulation.	We neither said nor implied that programs are developed randomly or indiscriminately. We did not change the report in response to this comment.
Chapter 1, Page 1	Chapter One, Noteworthy Accomplishments: This section creates the impression that non-regulatory programs address themselves only to businesses, non-profits, and governments. Many such programs direct themselves to the general population, making a measurable difference in reducing environmental risk through fostering change in citizen behavior.	In the “Noteworthy Achievements” section of Chapter 1, we have added, “EPA increasingly relies on voluntary programs as a tool for protecting the environment. EPA’s 54 headquarters voluntary programs are diverse, providing a variety of benefits to several different customer groups, including some non-governmental organizations and the public.”
Chapter 2, Page 4	Chapter Two, Voluntary Programs Need More Specific Definitions: We agree with a tentative conclusion of this section: “Agency-wide definition may not be feasible, EPA should develop additional criteria for groups and categories of voluntary programs that better describe the intent and function of these broader program types. Also, EPA must improve the way it communicates those	No OIG response necessary.

Section/ Page	OAR Comment	OIG Response
	definitions and criteria to each program office that operates voluntary programs.”	
Chapter 2, Page 6	Chapter 2, EPA Could Apply a Research and Development Approach: OAR disagrees with the finding the EPA lacks a systematic process for developing and testing new programs and for evaluating existing voluntary programs. Many individual programs are tracking results, and thoughtfully considering adjustments to their programs based upon internal as well as external evaluations. Also, the PART (Performance Assessment Rating Tool) is designed to rate the effectiveness of federal programs government-wide, and it has already been applied to a number of non-regulatory programs.	<p>One of our goals was to determine if EPA has consistent Agency-wide policies that govern voluntary programs. We found that EPA has no Agency-wide policies that require voluntary programs to collect comparable data, or conduct regular program evaluations of individual programs or across all defined voluntary programs.</p> <p>The statement that program results are tracked individually reaffirms our conclusion that "...there [is] no systematic means to aggregate and evaluate results <i>across</i> all non-regulatory programs at the Agency level”</p> <p>While we understand the importance of external evaluations, our recommendations focus on the development and implementation of consistent internal policy controls. We accept this comment as additional evidence that EPA lacks an Agency-wide policy that requires internal evaluations.</p>

Office of Prevention, Pesticides, and Toxic Substances (OPPTS)

Section/ Page	OPPTS Comment	OIG Response
Chapter 2, Page 8	First, the recommendations put forth by the Partnership Programs Review Workgroup address the first recommendation for developing and implementing Agency-wide management policies for voluntary programs.	We understand that a new draft document is awaiting approval. We look forward to the adoption and implementation of Agency-wide management policies that address our report recommendations.
Chapter 2, Page 7 and 8	Secondly, the research and development model referenced in OIG’s second recommendation does not recognize the fact that the IAC recommends using a different approach, namely the logic model approach. The report states on page 7 “Without a system to develop, test, and market new systems, or evaluation existing programs, EPA cannot determine which voluntary programs are succeeding, which are failing, and which ones should serve as models for future program development.” OPPT contends the logic model approach is a valid method for developing and evaluating programs.	<p>We agree that a logic model is a valid method for developing and evaluating programs. However, we do not believe that a logic model is sufficient to address our findings. We believe the R&D model will be complementary to the use of logic models.</p> <p>Our recommendation is designed to incorporate the R&D model as part of Agency-wide management policies to ensure the regular, periodic, and consistent development, piloting, testing, and evaluation of voluntary programs throughout their life cycles.</p>

Distribution

Office of the Administrator
Deputy Administrator, Office of the Administrator
Associate Administrator, Office of Policy, Economics, and Innovation
Principal Deputy Assistant Administrator, Office of Air and Radiation
Assistant Administrator, Office of Prevention, Pesticides, and Toxic Substances
Office of General Counsel
Agency Followup Official (the CFO)
Agency Followup Coordinator
Associate Administrator for Congressional and Intergovernmental Relations
Associate Administrator for Public Affairs
Audit Followup Coordinator, Office of the Administrator
Acting Inspector General