

Comments and Response to Comments Summary Template

Instructions

Comment from regions, state, tribe, or other stakeholder	Commenter (s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
Issue Area - <i>Divide comments into general issue areas: e.g. NAAQS, indoor air, etc. where appropriate)</i>				
<i>Include your comment.</i>	<i>Organization of Commenter (e.g., ECOS, New England Commissioners, Region X, etc.).</i>	<i>State the Section and page number the comment is referring to.</i>	<i>The response should include adequate discussion and details to support the decision to modify/retain the draft language. Note: If more than one commenter raises the same issue, please cross-reference the individual responses.</i>	<i>Specify changes made in response to comments and identify all locations in the final guidance (e.g., page numbers, sections, etc.).</i>

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Issue Area: Office of Environmental Information – Major Transformational Initiatives				
<p><i>Content Management: Identify and establish processes to capture “electronic” versions of records rather than receiving or printing paper copies.</i></p> <p>COMMENT: This one sentence sums up the entire content of this section to receive and distribute data electronically, saving energy and time.</p>	Linda Robins, Chickasaw Nation, Director of Environmental Services	Page 9	EPA has identified records management as an agency weakness and, as such, it is a priority to be addressed. OEI is currently leading the development of a Data and Content Management Policy, as well as developing a Content Management Strategy meant to address both EPA’s current record holdings as well as management of electronic records now and in the future.	No action taken
<i>Five (5) Priorities – 1. Focus on Service Quality; 2. Run OEI Like a Business; 3. Strengthen State, Tribal and Territorial Partnerships; 4 Establish a Strategic Direction; 5. Invest in Talent</i>	Linda Robins, Director of Environmental Services	Pages 3 & 4	The Chief Information Officer (CIO) sets five priorities which serve as guiding principles for supporting the Agency's mission. Resources to support OEI's priorities are not linked to reporting	No action taken

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<p><i>Management.</i></p> <p>COMMENT: How long of a period are we talking about? Will it be required to participate, for example, STORET for water? Not only tribes and other government agencies but the general public will have access to this information? More and more the focus is to be able to pull data from one data base is becoming the norm, when will this strategic plan charting the path be ready? In building the IM/IT workforce, will that reduce the amount of funds available to tribes and other agencies to be eligible for?</p>			<p>requirements for EPA Environmental Programs. OEI continues to provide Exchange Network grants to tribes interested in participating in the Exchange Network.</p>	
<p><i>25-point Implementation Plan to Reform Federal IT Management: Cloud Computing is the anticipated transition applications of data that is the buzz work for IM/IT. All data imported will be collected in cloud computing and be available for all agencies and/or tribes to access.</i></p> <p>COMMENT: When it is time to submit quarterly reports, we submit to our specific regional office and from there is entered into the cloud computing system, that is your agency's responsibility to be sure it is? The tribes will not be required to submit another report and our</p>	<p><i>Linda Robins, Director Environmental Services</i></p>	<p><i>Page 7</i></p>	<p>EPA's implementation of the 25 Point Plan will not have any impact on our Tribal partners exchanging data with EPA. In fact, the intent is to add value and improve performance of exchanges in the future. Given there are no programmatic or regulatory changes, implementation of technologies like Cloud computing should only benefit all stakeholders.</p>	<p>No action taken</p>

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original submission cannot be lost in the system so you think we have not submitted our quarterly report?				
COMMENT: Project Report – if all the planning and implementation of this reporting becomes mandatory, can there be some type of notification in the system to let tribes know the reports have been received and not having to re-submit?	Linda Robins, Director Environmental Services	Not in draft, questions in general.	Notifications to submitters of successful receipt of information vary by EPA program. However, as an Agency, we strive to inform and communicate status to trading partners as a standard practice.	No action taken
<p><i>EPA Geospatial Platform: “In FY 2013, OEI will: Operationalize the EPA Geoplatform infrastructure to support many internal EPA business processes and to share data, maps, code, and logic on an agency-wide basis, and promote standard approaches for intranet and public access geospatial application development.”</i></p> <p>COMMENT: Coordination with Tribes and EPA regional offices is needed to support accurate maps of Indian Country. Mapping tools or web based technology loses its effectiveness when tribal lands are not accurately identified. For example, the maps used for background information on the perchlorate detections across the country do not comprehensively include potentially affected tribes within the identified boundary. Another example, the TRI analysis tool does not identify tribal lands</p>	Nancy John, Cherokee Nation, Director of Environmental Programs	Page 10	OEI recognizes the critical need for accurate tribal boundary datasets to improve our shared ability for environmental decision making. As such, we are working both internally at EPA as well as with our federal and tribal partners to work as a community towards improving tribal lands representation in our mapping products. While EPA is not the primary steward of national tribal boundary data, we are a major stakeholder and will continue our efforts to assist with and advocate for improvements in this data over time.	No action taken

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within Oklahoma and does not work effectively when querying facility locations vs tribal lands.				
<p>Note: Full text comments and attachments were sent in an email from Michael Jacoby to Sue Priftis on 3/19/2012. The following text below is a summary of the email:</p> <p><i>Subject: The absence of vital information in NPM Guidance (Draft)</i></p> <p><i>Upon reading the Draft of the National Program Manager (NPM) Guidance, I could not find anything directly addressing the Data Verification (DV) issues brought to the attention of Administrator Jackson since it primarily involves the locational information / data used by OSWER – OEM etc. that in my opinion should be first certified for accuracy before incorporation into FRS. Are your NPM's aware of these locational data problems? Have they, your managers ever received any Data Verification Training (DVT) so they can personally check a site's locational data for errors thus overseeing the data problem by implementing corrective action?</i></p> <p><i>The locational data problems that were discovered years ago are still affecting the public now... to a much greater degree, since the information is being</i></p>	<p><i>Michael Jacoby, Seven Valleys, PA</i></p>	<p><i>Unspecified</i></p>	<p>The data contained in FRS is collected not just by EPA but by others, i.e. state and tribal partners. The EPA does not provide data entry or data verification training to them but rather counts on them to provide that training and quality assurance. It is EPA policy to ask that, whenever possible, the data be certified by data collectors and direct reporters before it reaches FRS. EPA seeks to improve FRS data quality, but that effort focuses on the data once it has been received from external parties, and those efforts include automated data quality checks as well as web services and tools for data reporters and users to help them enter high quality data and integrate it.</p>	<p>Note: Full text comments and attachments were sent in an email from Michael Jacoby to Sue Priftis on 3/19/2012. The following text below is a summary of the email:</p> <p><i>Subject: The absence of vital information in NPM Guidance (Draft)</i></p> <p><i>Upon reading the Draft of the National Program Manager (NPM) Guidance, I could not find anything directly addressing the Data Verification (DV) issues brought to the attention of Administrator Jackson since it primarily involves the locational information / data used by OSWER – OEM etc. that in my opinion should be first certified for accuracy before incorporation into FRS. Are your NPM's aware of these locational data problems? Have they, your managers ever received any Data Verification Training (DVT) so they can personally check a site's locational data for errors thus overseeing the data problem by implementing corrective action?</i></p>

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<i>shared with other data systems now throughout the Internet.</i>				<i>The locational data problems that were discovered years ago are still affecting the public now... to a much greater degree, since the information is being shared with other data systems now throughout the Internet.</i>