



Office of Inspector General

Audit Report

INFORMATION TECHNOLOGY

Unreliable Data Affects Usability of DOCKET Information

Report Number 2002-P-00004

January 18, 2002

**Inspector General Division
Conducting the Audit**

**Information Technology Audits Staff,
Washington, DC**

Regions Covered

All

Program Office Involved

Office of Enforcement and Compliance Assurance

Audit Team Members

**Ed Shields
Chuck Dade
John Ewan
Rudolph Brevard
Teresa Richardson
Judy Tsai
David Cofer**

Abbreviations

AO	Administrative Order
CCDS	Case Conclusion Data Sheet
CDETS	Consent Decree Tracking System
DOCKET	EPA's National Enforcement Docket System
EPA	United States Environmental Protection Agency
GAO	United States General Accounting Office
GPRA	Government Performance and Results Act
ICIS	Integrated Compliance Information System
IDEA	Interactive Data Extraction and Analysis Software
IG	Inspector General
OECA	Office of Enforcement and Compliance Assurance
OIG	Office of Inspector General
Regions	Ten Regional Offices, Headquarters' Mobile Source Enforcement Branch, and Headquarters' Toxics and Pesticides Enforcement Division
SEP	Supplemental Environmental Project



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

JAN 18 2002

OFFICE OF
THE INSPECTOR GENERAL

MEMORANDUM

SUBJECT: **Final Report: Unreliable Data Affects Usability of DOCKET Information**
Audit No. 2000-0000813
Report No. 2002-P-00004

FROM: *Edward S. Shields for*
Patricia H. Hill, Director
Information Technology Audits Staff (2421)

TO: Sylvia K. Lowrance, Acting Assistant Administrator
Office of Enforcement and Compliance Assurance (2201A)

Attached is our final report entitled "Unreliable Data Affects Usability of DOCKET Information." The objective of this audit was to assess whether DOCKET contained accurate and reliable data for managing enforcement actions, as well as reporting on environmental progress.

This audit report contains findings that describe problems the Office of Inspector General (OIG) has identified and corrective actions the OIG recommends. This audit report represents the opinion of the OIG, and the findings contained in this audit report do not necessarily represent the final EPA position. Final determinations on the matters in the audit report will be made by EPA managers in accordance with established EPA audit resolution procedures.

Action Required

In accordance with EPA Order 2750, you, as an action official, are required to provide us with a written response to the audit report within 90 days of the final report date. If corrective actions will not be complete by the response date, we ask that you describe the actions that are ongoing and reference specific milestone dates which will assist us in deciding whether to close this report. In addition, please track all action plans and milestone dates in EPA's Management Audit Tracking System.

We appreciate the cooperation afforded us during the course of this audit by the Regions and OECA. We have no objections to the further release of this report to the public. Should you or your staff have any questions regarding this report, please contact Ed Shields, Audit Manager, Information Technology Audits Staff, at (202) 260-3656.

Attachment

EXECUTIVE SUMMARY

INTRODUCTION

The National Enforcement Docket System (DOCKET) is the official United States Environmental Protection Agency (EPA) database for tracking and reporting on civil judicial and administrative enforcement actions. EPA developed DOCKET to track the life-cycle of an enforcement action from its initiation to its conclusion. The Office of Enforcement and Compliance Assurance (OECA) provides policies and procedures for the DOCKET system, while EPA regions and Headquarters' offices are responsible for entering and maintaining information within the system.

OBJECTIVE

The audit objective was to assess whether DOCKET contained accurate and reliable data for managing enforcement actions, as well as reporting on environmental progress.

RESULTS IN BRIEF

EPA under-reported the environmental impact of enforcement actions under the Government Performance and Results Act (GPRA). Our audit disclosed that 69 percent of the applicable fiscal 2000 pollutant records contained blank pollutant amount fields. The pollutant amount field should have contained amounts used to compute and report pollutant reductions under GPRA. Additionally, our audit determined the DOCKET system, as a whole, contained significant instances of inaccurate and incomplete data. Specifically, 94 percent of the cases reviewed within DOCKET contained at least one error in a key field. Until management takes decisive steps to address particular data weaknesses, neither Congress, the public, nor EPA management should depend on the DOCKET system as a reliable source of environmental data.

OECA is implementing a replacement system for DOCKET, the Integrated Compliance Information System (ICIS), for the express purpose of tracking and managing enforcement compliance cases. However, if improvements are not made

so that ICIS can avoid the problems encountered with DOCKET, enforcement data quality will continue to suffer. In order for ICIS to adequately meet user needs and be a meaningful source of information, in accordance with GPRA, the multiple causes that contributed to incomplete and inaccurate data in DOCKET need to be addressed. Factors contributing to the poor data quality included a cumbersome system that lacks the functionality needed to manage cases; inadequate and outdated policies, procedures, and guidance; and the absence of comprehensive reviews.

RECOMMENDATIONS

Due to the nature of the audit findings, OECA, as well as the 10 regions, Headquarters' Mobile Source Enforcement Branch, and Headquarters' Toxics and Pesticides Enforcement Division, will need to implement corrective actions to effectively address these weaknesses. In particular, we recommend that the Assistant Administrator for Enforcement and Compliance Assurance improve overall policies and procedures for: computing pollutant related information, performing quality assurance, disseminating training, and monitoring the implementation of the policies. The Assistant Administrator also needs to (1) develop and implement a process to ensure system requirements identified by the users are included in the design and implementation of the system being developed to replace DOCKET, and (2) develop and apply a scrubbing process to the DOCKET data used to populate the new system to ensure it is accurate and complete.

We also made several recommendations to the Regional Administrators and the Director of Toxics and Pesticides Enforcement Division and the Chief of the Mobile Source Enforcement Branch. These recommendations entail establishing regional policies and procedures that (1) ensure compliance with Headquarters' policies and procedures; (2) outline required cross-organizational lines of authority and communication; and (3) implement a monitoring process to ensure regional policies and procedures are followed, continuously reevaluated, and improved.

**AGENCY COMMENTS
AND OIG EVALUATION**

In general, the Agency officials agreed with the conditions identified in the report. However, the Agency believes the report overstates the unreliability of the data. In a memorandum dated December 19, 2001, the Agency proposed separating Judicial (Civil) cases from Administrative cases. The Agency believed this would provide a better representation of DOCKET data reliability because certain fields only apply to Judicial cases.

We employed a methodology that conservatively assessed the overall reliability of the data within DOCKET. We evaluated each field based on whether it was applicable to the particular case. For example, if a field was not applicable and was left blank, we accepted it as correct. This methodology provided a very conservative error rate in comparison to separately evaluating cases applicable to a specific situation. We obtained concurrence on the methodology from Agency officials and the General Accounting Office (GAO) prior to beginning the review.

We believe that data unreliability is not overstated, based on the significant error rates uncovered for most of the key fields reviewed.

Agency officials stated they would respond to the specific recommendations upon receipt of the final report.

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CHAPTER 1

INTRODUCTION

Purpose

The audit objective was to assess whether the National Enforcement Docket System (DOCKET) contained accurate and reliable data for managing enforcement actions, as well as reporting on environmental progress.

Background

In October 1998, several Committee Chairmen in the House of Representatives tasked the Inspector General (IG) community with verifying and validating selected data sources and information systems used to report on the Agency's Government Performance and Results Act (GPRA) annual performance goals. In December 1998, the Senate also suggested the IG community verify and validate the accuracy and reliability of the performance data used to report on the Agency's GPRA annual performance goals.

DOCKET is EPA's official database for tracking and reporting on civil judicial and administrative enforcement actions. EPA developed this national, automated information system to track civil litigation and administrative actions from case development to closure under all environmental statutes. DOCKET includes facility and defendant information, and can be used to track all major milestone events of a case. For example, DOCKET can track complaints, settlements, and Supplemental Environmental Projects (SEP). The Office of Enforcement and Compliance Assurance (OECA) has responsibility for providing policies and procedures for the DOCKET system, while both EPA Headquarters and regional offices are responsible for entering and maintaining information within the system.

The Consent Decree Tracking System (CDETS) is a national database closely related to the DOCKET system. CDETS tracks facility and compliance schedule information of consent decrees. The system assists the tracking,

managing, and reporting of compliance status information from the point of initiation until facilities are in compliance and the decree is terminated. Because of this close relationship, CDETS was included in the data accuracy and reliability work of this audit.

In 1999, Congress asked the National Academy of Public Administration to conduct an independent evaluation of state and federal enforcement data and to make recommendations to Congress, EPA, and the states regarding actions necessary for ensuring public access to accurate, credible, and consistent enforcement data. The Academy's June 2001 report, "Evaluating Environmental Progress: How EPA and the States Can Improve the Quality of Enforcement and Compliance Information," *pointed out the increasing importance of reliable enforcement and compliance data*. The report indicated that good information was rapidly becoming an essential element for environmental protection, and that reliable enforcement and compliance data should be considered a prerequisite for all environmental programs. The Academy's report emphasized that reliable data was essential for EPA and the state environmental agencies to identify environmental problems, set goals, select tools to remedy problems, measure their progress, analyze the effectiveness of their programs, and adjust their strategies accordingly.

Furthermore, the report stated:

"Good information is fundamental to effective management and public confidence in government agencies. For the last three decades, however, EPA and most state environmental agencies have relied on data about enforcement activities that do not actually show how well the environment is doing, or how well the regulated community is obeying environmental laws. To the extent that these data measure enforcement or other governmental performance, they are much more likely to be misleading than useful."

The Academy panel concluded that current data on enforcement and compliance, and the systems used to collect and disseminate that data, were inadequate to meet the needs of the next generation of environmental programs.

Scope and Methodology

The primary focus of the audit was to evaluate the reliability of specific DOCKET data elements used to track and manage enforcement activities, as well as support externally-reported GPRA performance measures and annual performance goals. We conducted audit fieldwork from November 2000 through June 2001, visiting all 10 EPA regional offices, Headquarters' Mobile Source Enforcement Branch, and Headquarters' Toxics and Pesticides Enforcement Division (hereafter referred to *collectively* as "regions"). We conducted this audit in accordance with *Government Auditing Standards*, and requested and reviewed applicable documentation governing DOCKET. For further discussion of our scope and methodology, refer to the scope and methodology section included in the Exhibit.

Prior Audit Coverage

In March 2001, the Office of Inspector General (OIG) issued a report entitled "Enforcement: Compliance with Enforcement Instruments" (Report No. 2001-P-00006). The audit found that:

- OECA's annual accomplishment reports did not accurately represent the actual environmental benefits resulting from enforcement activities, and associated performance measures were not sufficient to determine the program's actual accomplishments.
- Regions did not always adequately monitor compliance with enforcement instruments nor did they always consider further enforcement actions.

For more information, refer to the prior audit coverage section included in the Exhibit.

The Agency is in the process of responding to this report.

Criteria

We used Agency policies and procedures to form a framework of prudent practices for processing DOCKET data. The following criteria were of particular importance to our audit field work and analysis:

- Procedures for Maintenance of Enforcement Docket System
- Enforcement DOCKET Maintenance
- Quality Assurance of Active Civil Enforcement Case DOCKET
- Support of the Enforcement DOCKET for Information Management in OECA
- Clarification of Administrative Order Tracking Requirements
- Tracking EPA Administrative Action in DOCKET
- Guidance for Case Conclusion Data Sheet (CCDS) Reporting Improvements

For summaries of each of these policy memorandums, refer to the criteria section included in the Exhibit.

CHAPTER 2

GPRA ENVIRONMENTAL IMPACT UNDER-REPORTED

EPA under-reported the environmental impact of enforcement actions under GPRA. This occurred due to incomplete data in the DOCKET System (see Chapter 3). In particular, DOCKET data was not accurate and complete for providing information on enforcement actions that resulted in pollutant reductions. As a result, the information provided to Congress, the public, and EPA management was not reliable.

EPA Under-Reported Environmental Impact

Incomplete pollutant information prevented EPA from accurately measuring environmental impact. According to Section II of EPA's fiscal 2000 Annual Report, EPA enforcement actions resulted in a reduction of approximately 714 million pounds of pollutants. We reviewed the methodology used to report pollutant reductions stemming from enforcement actions and found pollutant amount data incomplete.

EPA uses DOCKET data to estimate the amount of pollutant reduced as a result of enforcement actions. This process requires pollutant amount information to be completed for all enforcement actions reported as SEP or compliance action pollutant reductions. EPA calculates pollutant reduction estimates by selecting records that have pollutant reductions associated with a SEP or compliance action. EPA only includes a record in the calculation if it has both the Pollutant Name and Pollutant Amount.

We selected the pollutant records associated with SEP or compliance action reductions. For the records selected, we tested the relationship between the Pollutant Name and Pollutant Amount fields to determine how many pollutant records did not have either a Pollutant Name or Pollutant Amount. All pollutant records had Pollutant Names. However, a significant number of records did not have

Pollutant Amounts recorded, and consequently were not used in the calculation of pollutant reductions. The following table shows our results for fiscals 1998, 1999, and 2000.

Fiscal Year	Number of Pollutant Records Associated with SEP & Compliance Action Pollutant Reductions Identified *	Percent of Records Without Pollutant Amounts Entered
1998	1,738	62%
1999	1,561	56%
2000	1,476	69%

* **NOTE:** The number of pollutant records is different from the number of enforcement actions because each enforcement action case can generate multiple pollutant records.

As noted in the table, in fiscal 2000, 69 percent of the pollutant records identified as SEP reductions or compliance action reductions did not contain pollutant amount information in DOCKET. As a result, EPA could not accurately quantify the estimated environmental impact of enforcement actions and, most likely, understated progress made in reducing pollutants.

GPR-Related Fields Inaccurate, Incomplete, or Unsupported

Our review of 53 key fields disclosed that several fields used for computing GPR results were inaccurate, incomplete, or unsupported. We found that the following GPR-related fields contained among the highest occurrences of inaccurate, incomplete, or unsupported data.

DOCKET Screen Input Field Name	Projected Statistical Error Rate (%)
Units	54%
Amount Pollutant	52%
Media	52%
Pollutant ID/case	51%
Percent	51%
Frequency	51%
Pollutant Name	43%

NOTE: These fields are defined within the table in Chapter 3.

Existing Problems Affect Future Reporting

EPA's current understatement of actual performance results could result in management setting lower, future performance targets. Moreover, the high instance of missing data prevents EPA from (1) measuring the effectiveness of environmental policy, and (2) optimally directing national environmental efforts. With more reliable measurement data, EPA will have the potential to set more realistic and progressive targets for enforcement actions that result in pollutant reductions. Finally, management will be able to focus on enforcement actions that generate the greatest environmental impact.

Management intends to use DOCKET as the baseline for populating a replacement system – the Integrated Compliance Information System (ICIS). Therefore, if management does not address missing and inaccurate DOCKET data in a prompt manner, the problems will continue in ICIS.

Chapter 4 provides further details, including causes of the DOCKET inadequacies and recommendations for corrective actions.

Agency Comments and OIG Evaluation

The Agency officials agreed with the problems we identified. They also concluded there has been significant under-reporting of pollutant reductions. However, they believe that the understatement does not

warrant calling the data unreliable. They believe that understating the impact is preferable and more credible than overstating it, and that the data should just be considered an underestimate.

We concur that it is preferable and more credible to be conservative when providing estimates. However, we believe that estimates should be based on a consistent methodology that:

- provides a reasonable assurance that the majority of the applicable data is included, and
- the absence of any data would not have a material impact on decision-making.

This is not the case based on the Agency's own belief that the pollutant reduction estimates have been significantly under-reported. For example, GPRA data is used to assess what EPA accomplishes over a set period of time and is also used for establishing a baseline for future improvements. By setting the baseline so low, *perceived* performance improvements can be achieved, without actually improving performance, by including a larger percentage of the applicable data in the future year's calculation. The same scenario applies to using the data internally for managing.

At the Agency's request, we made changes to Chapter 2 to clarify that the data contained in pollutant-related data fields are estimates rather than actuals.

Additionally, Agency officials indicated they were unsure how inaccurate, incomplete, or unsupported DOCKET data included within fields utilized for computing GPRA results (GPRA-related fields) could affect those results.

We believe that employing inaccurate, incomplete, or unsupported DOCKET data to compute GPRA results will render inaccurate outcomes.

The Agency indicated that they developed a training module to disseminate the information contained in the pollutant

reduction estimating guidance. Management assured us that regional training would be completed by the fourth quarter of fiscal 2002.

CHAPTER 3

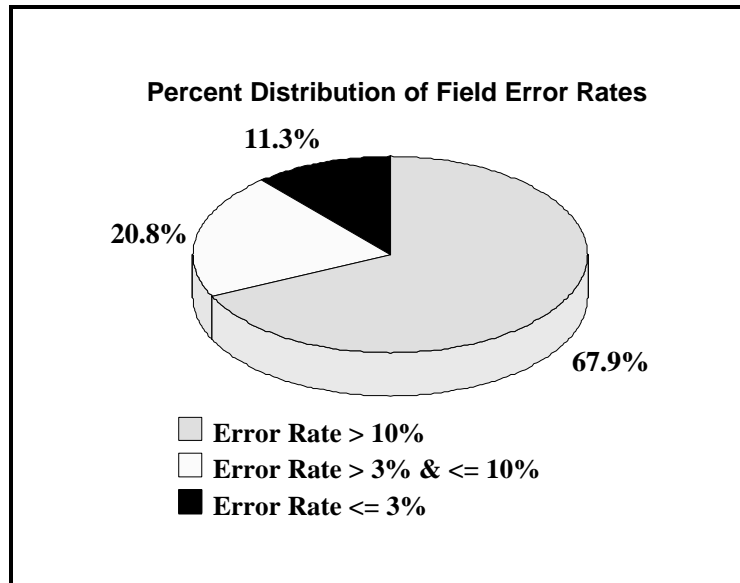
UNRELIABLE DATA IMPAIRS USABILITY OF SYSTEM INFORMATION

DOCKET contained significant instances of inaccurate and incomplete data. Many crucial fields were inaccurate and incomplete, thereby creating a questionable baseline for managing the national enforcement program and assessing EPA's environmental performance. Specifically, 94 percent of the cases reviewed within DOCKET contained errors in key fields. Therefore, neither Congress, the public, nor EPA management should depend on the DOCKET system as a reliable source of environmental data on enforcement actions. The seriousness of the problem is compounded by the fact that EPA is making an increasing amount of DOCKET data available to the public via EPA Internet websites. Factors contributing to poor data quality included a cumbersome system that lacks functionality needed to manage cases; inadequate and outdated policies, procedures, and guidance; and the absence of comprehensive quality assurance reviews.

DOCKET Data Inaccurate, Incomplete, or Unsupported

Analysis of statistical sample results showed that 94 percent of DOCKET cases contained at least one error within the 53 key fields reviewed. Both the OIG and OECA management believed these 53 fields were critical to managing the enforcement programs. These fields identified key milestone dates, as well as quantitative information related to pollutants, penalties, SEPs, and cost recovery. The 53 key fields included three fields which OECA management specifically requested us to review.

We verified these data elements to source documentation (detailed information available upon request). Our field work disclosed that more than 88 percent (88.7% = 67.9% + 20.8%) of the key fields had an error rate greater than 3 percent, and just under 68 percent had an error rate greater than 10 percent, as shown in the accompanying chart.



Our review disclosed that most key data fields were inaccurate, incomplete, or unsupported. As a result, the system often lacked data needed by management to (1) identify and track cases, and (2) report accurate performance information to Congress. The following table identifies the data elements reviewed with error rates greater than 30 percent.

DOCKET Screen Input Field Name	Projected Statistical Error Rate (%)	Field Definition
Case Summary	71%	A summary of the violation(s), environmental problem(s), and a description of the cause(s) of action (basis of legal action). The Case Summary should provide: <ul style="list-style-type: none"> • A brief summary of the nature of the matter (civil or administrative) and the problem to be addressed. • The name of principal defendant(s) and type and number of defendant(s). • A summary of relief requested. • Any special facts or circumstances relevant to the case.
Units *	54%	The measure used for the amount of reduction or elimination of each pollutant or waste.
Closed	54%	When all conditions, terms, and monetary requirements of the order or the settlement document have been met, the case is considered closed. A case may also be closed if no further action is contemplated by EPA.
Amount Pollutant *	52%	The amount of reduction or elimination of each pollutant or waste in pounds, kilograms, or liquid measure.
Media *	52%	The media where the pollutants or waste were emitted/discharged (e.g., land, water, air).
Pollutant ID/case *	51%	The pollutant identification number or code assigned to each pollutant selected.
Percent *	51%	The percent of pollutant or waste reduced or eliminated.
Frequency *	51%	The frequency measure (in units of time) used for the amount of reduction or elimination of each pollutant or waste.
Pollutant Name *	43%	The waste material, substance, or chemical involved at the facility in violation at the case level. At the settlement level, the field is used to identify the pollutants impacted by the physical actions taken.

* Fields used for GPRA purposes.

The error rates for the three fields specifically requested by OECA Senior Management were: 71 percent for Case Summary, 29 percent for Court Docket Number, and 21 percent for Judicial District.

Only reliable information should be shared with Congress and the public. These error rates are unacceptable if EPA plans to use this data to address Congressional and public needs. Moreover, the degree of incomplete or inaccurate system data hampers the ability to successfully measure enforcement actions.

Deletion of Cases Not Properly Controlled

OECA and regional management did not enforce consistent procedures to ensure deletions of enforcement cases were properly documented, authorized, and controlled. OECA did not have a policy that required written justification and management authorization prior to deleting a case from the system. Consequently, no regional policies existed to ensure internal controls were applied when deleting case records. Our regional field work disclosed numerous instances where cases were deleted without proper authorization and support.

Currently, regions use various local systems to track the status of cases, rather than relying on DOCKET data as a management tool. However, OECA is implementing a replacement system, ICIS, for the express purpose of tracking and managing enforcement actions. With the introduction of ICIS, regions will be expected to eliminate the redundant systems. As a result, the reliability of data in the new system will play an even larger role for properly tracking the status of cases. Therefore, management must establish and implement consistent, effective controls over the deletion of case records or ICIS will inherit and perpetuate the same data problems.

Input Errors Do Not Play Significant Role

We noted that input errors were not instrumental in causing the inaccuracy and incompleteness of the data. To determine the input error rate, we verified the contents of 162 fields to the applicable input documents. The 162 fields were selected based on our knowledge of DOCKET and CDETS, and on discussions with OECA representatives. These fields include the 53 key fields previously discussed. A field was counted as an error if the contents of the DOCKET field did not match the input document.

Less than 14 percent of the fields selected had an error rate greater than or equal to 3 percent, and less than 2 percent had error rates greater than or equal to 5 percent. The following table shows the three fields with error rates greater than or equal to 5 percent. Based on these results, we concluded that input errors did not have a substantial impact on the inaccuracy and incompleteness of DOCKET data.

DOCKET Screen Input Field Name	Projected Statistical Error Rate (%)
Complaint/AO (Administrative Order) Issued (Date Field)	5.86%
Law/Section	5.52%
Lead EPA Attorney	5.17%

Details regarding the results of this review will be provided upon request.

Chapter 4 provides further details, including causes of the DOCKET inadequacies and recommendations for corrective actions.

**Agency Comments
and OIG Evaluation**

Agency officials agreed with the problems we identified. However, management believes the report overstates the unreliability of the data. In a memorandum dated December 19, 2001, the Agency proposed separating Judicial (Civil) cases from Administrative cases. The Agency believed this would provide a better representation of DOCKET data reliability because certain fields only apply to Judicial cases.

Management is correct in stating that certain fields only apply under specific circumstances related to each case. In addition to the fields that are only applicable to Judicial cases, some fields are only applicable to Administrative cases, cases with SEPs, Multi-Media cases, etc..

We employed a methodology that conservatively assessed the overall reliability of the data within DOCKET. We

evaluated each field reviewed based on whether it was applicable to the particular case. If a field was not applicable and was left blank, then we accepted it as correct. This methodology provided a very conservative error rate in comparison to separately evaluating cases applicable to each specific situation. We obtained concurrence on the methodology from Agency officials and the General Accounting Office (GAO) prior to beginning the review.

We disagree with the Agency's specific examples to support separating Judicial from Administrative cases because the fields listed in its response are not solely applicable to Civil Judicial Cases. For example, the Case Summary field is also required for Administrative Cases based on section 2.1 of the Agency's DOCKET User's Manual and the Agency's Administrative Case Data Form, issued by Headquarters. The Pollutant Name field is optional (not required) for both Judicial and Administrative Cases according to sections 3.4, 3.25, 3.28, & 3.29 of the same manual. Likewise, the Penalty By Statute field applies to both Judicial and Administrative cases as long as they are a multi-media case with a penalty. To ensure that we did not overstate any of the reported error rates, we double-checked our work. We did not find problems specific to this situation. However, we did find and correct errors affecting the Penalty by Statute field caused when the results data was transferred from Word Perfect to Lotus.

We believe the unreliability of data is not overstated, based on the significant error rates uncovered for most of the key fields reviewed.

We provided the results of our review at the case level so the Agency could break out the results by Civil and Administrative Cases. As such, management can perform further analysis that they deem to be of additional benefit.

The Agency also stated that they believe the data in DOCKET is adequate to track the status of Civil Judicial and Administrative cases.

We believe that for the data to be useful for managing purposes, it needs to be reliable. Based on the significant error rates uncovered for most of the key fields reviewed, we believe the DOCKET data is not adequate for tracking the status of Civil Judicial and Administrative caseload.

The results of our fieldwork indicate that Headquarters is the primary user of collected DOCKET data, and that most regions use DOCKET predominately as a reporting system to EPA Headquarters. Regions input the information into DOCKET, even though it does not meet their needs, because they have been directed to do so by Headquarters. The data fields reviewed were key elements for managing enforcement actions, based on a consensus between OECA management and the OIG. In addition to quantitative information, these fields included data used specifically for tracking the status of the cases, such as milestone dates. The fact that resources are dedicated to collecting data that is primarily used by Headquarters, rather than what the regions need to manage, substantiates the importance of this data to Headquarters.

The Agency requested the report be clear about the source of the problems so that corrective actions could be targeted appropriately. We identified what we believe to be the root causes within Chapter 4 of the report. We focused our recommendations, also included in Chapter 4, on corrective actions to address those causes.

Agency officials also indicated that they have never experienced problems due to the absence of procedural controls for deleting cases from the system. They stated that when a case is deleted, it is not critical to managing their enforcement program.

We found that the Agency does not have compensating controls in place to determine if cases were improperly deleted. We believe it is important to apply proper internal controls to ensure the integrity of system data. Instituting a standard control practice becomes even more critical with the advent of ICIS, because the regions will be expected to

use it to manage and track the status of cases rather than using stovepipe systems.

CHAPTER 4

CORRECTIVE ACTIONS NEEDED PRIOR TO IMPLEMENTING REPLACEMENT SYSTEM

OECA is implementing a replacement system for DOCKET, the Integrated Compliance Information System (ICIS), for the express purpose of tracking and managing enforcement actions. If improvements are not made to keep ICIS from having the same problems as DOCKET, enforcement data quality will continue to suffer. Due to DOCKET's lack of functionality, regions only used it as an information reporting system to EPA Headquarters, and not as an enforcement case management system. If ICIS does not fulfill that role, then regions will continue to expend additional resources to maintain redundant systems for their particular managing needs.

Poor Data Quality May Continue In ICIS

Poor enforcement data quality will continue if EPA's new enforcement system, ICIS, does not meet the regions' needs for managing enforcement actions on a day-to-day basis. Because of the difficulties encountered with DOCKET, users primarily relied on their regional systems for managing cases and placed less importance on the quality of data entered in DOCKET. The regions have identified critical functions they deem necessary to meet management requirements and improve data quality in ICIS. With the introduction of ICIS, regions will be expected to eliminate the redundant systems. However, if EPA does not address the user's needs within ICIS, the new system will perpetuate the same data quality concerns.

Regional personnel consistently acknowledged the importance of having a single system for tracking and managing enforcement actions. As such, all regions participated in OECA focus group discussions to identify ICIS system requirements. In addition, some regions provided us with input regarding system improvements. A few of the regional suggestions were:

- Establish single point of entry to satisfy all environmental systems' data requirements.
- Establish security controls to protect high profile litigation or high dollar cases.
- Establish automatic notification of missed milestones (e.g., e-mail).

See Appendix 2 for a complete listing of regional suggestions.

If ICIS is not designed to meet user needs, then regions will continue to expend additional resources to maintain redundant systems. We surveyed EPA to determine the extent regions were developing and maintaining independent systems for enforcement and compliance tracking. We received responses from all regions and found that they have already spent \$290,000 to develop 19 redundant, “stove-piped” systems to meet their needs, and have budgeted approximately \$1.3 million over the next 5 years to maintain those 19 systems. We believe the regions could better use these funds to support environmental programs.

**Causes for Unreliable
DOCKET Data Need
to be Addressed**

Our review disclosed that multiple causes contributed to incomplete and inaccurate data in DOCKET. Specifically, we identified the following main factors:

- DOCKET was not used to manage, because it was considered cumbersome and lacked functionality.
- DOCKET's policies, procedures, and guidance were outdated and inconsistent.
- OECA did not provide guidance on identifying and calculating pollutant information.
- Regions did not comprehensively review enforcement data.

- Regional policies and procedures were inadequate and inconsistent.

Details on each of these areas follow.

System Not Used to Manage

Regions did not use DOCKET on a daily basis for enforcement case management, because users said they considered the system to be cumbersome, non-user-friendly, and lacking the functionality needed to manage. Regions were primarily using DOCKET as an information reporting system to EPA Headquarters.

DOCKET's Policies, Procedures, and Guidance Were Outdated and Inconsistent

OECA had not updated the DOCKET User's Guide and Data Dictionary to identify critical data elements essential for performance reporting. Many crucial data elements were designated as optional, resulting in many database fields being unpopulated. For example, the current DOCKET User's Guide states the pollutant fields are optional. Therefore, pollutant information is often not reported, even though such data factors into Congressionally-reported performance measures. The error rates for these particular fields are listed in Chapter 2.

In addition, inconsistencies between DOCKET's User's Guide, Data Dictionary, and input forms could lead to confusion by users. Some examples of inconsistencies are:

- The Administrative Case Data Form indicates that fields are required, although the detailed section of the User's Guide indicates they are not required.
- The Administrative Case Data Form indicates that certain fields included on the form are not required, even though the general section of the User's Guide indicates they all are required.
- The required fields per the Data Dictionary do not always coincide with the User's Guide required fields.

Furthermore, DOCKET does not force users to input data into many key fields. OECA indicated that the User's Guide and Data Dictionary define required fields as those for which the system demands data input. However, prudent practices should ensure that fields which senior management have identified as key to managing the program and reporting results coincide with the mandatory entry fields defined in the application system. Because DOCKET's system requirements do not always correspond with management's desires, users cannot always trust the User's Guide or Data Dictionary to determine what data they must enter into the system.

**Guidance Not Provided
for Addressing
Pollutant Information**

Although EPA recently issued an extensive training manual regarding pollutant information, the regions have not implemented the guidance. Our field work concluded that personnel consistently provided incomplete or inaccurate pollutant information and needed to be trained. OECA reached similar conclusions as a result of independent studies, although they did not issue any comprehensive training guidance until January 2001. During the last several years, OECA has enhanced DOCKET to accommodate input of CCDS information, created a new CCDS, and initiated additional reviews to address weaknesses in their information reporting methodology. OECA's latest review¹ found that incomplete data was a major issue for several key data elements, such as pollutant name, amount, and units.

Whereas OECA's recent manual included guidance on how to identify and calculate pollutant information, management did not identify an implementation date for using the new procedures. Consequently, the regions did not apply the guidance. OECA stated that a program for delivering onsite training is being developed.

¹ Report entitled, "Review, Analysis, and Recommendations for Improvement of Office of Enforcement and Compliance Assurance Case Conclusion Data Sheets – Final Report," dated November 29, 1999, Page 1.

To accurately and consistently compute pollutant information associated with compliance actions, field inspectors must be aware of the information needed for the computations outlined in the guidance. In some cases, these field inspectors are state employees. If the state field inspectors are not advised of the data necessary for the computations associated with potential compliance actions, then it is conceivable that not all of the necessary information will be collected during the inspection. Without this information, EPA may still have problems accurately and consistently computing pollutant information.

**Quality Assurance Reviews
Not Performed**

Regions relied on inconsistent, limited reviews rather than systematic and comprehensive quality assurance reviews. Although OECA published procedures for conducting monthly quality assurance reviews of all DOCKET fields, the regions were not adhering to the policy. The policy requires that the lead attorneys review and update all data fields using the Monthly Case Update Report. In addition, the User's Guide states that the information for completing some of the key fields will be provided on the Monthly Case Update Report. We found that the regions were not using this report and, as a result, the information for these fields were often not completed or reviewed.

None of the regions had formal policies and procedures which assigned responsibility and accountability for conducting quality reviews. The informal reviews merely consisted of reconciling case names in stovepipe systems to DOCKET and/or performing high-level reviews of limited fields. Furthermore, we found that whenever regions distributed reports for quality assurance purposes, the reports did not contain all data fields. The inconsistent and limited nature of quality assurance reviews perpetuated high error rates in DOCKET.

**Policies and Procedures
Need Improvement**

The regions did not have formal policies and procedures to implement OECA's policies, procedures, and guidance for all phases of enforcement data processing (i.e., identification, collection, inputting, deletion, quality assurance, etc.). As a result, regional management had not

formalized its expectations, nor implemented a formal mechanism to ensure that personnel processed enforcement information in a consistent manner. The lack of formalized policies and procedures led to inconsistencies in the way enforcement data was processed from region to region, as well as within regions.

Recommendations

We recommend the Assistant Administrator for Enforcement and Compliance Assurance:

1. Develop and implement a process to ensure system requirements, identified by the users at Headquarters and within the regions, are included in the design and implementation of the system being developed to replace DOCKET.
2. With regards to OECA's policies, procedures, and guidance related to DOCKET, as well as guidance related to pollutant information:
 - a. Revise, consolidate, issue, and monitor the implementation of all policies, procedures, and policy memorandums related to DOCKET. The policies and procedures should:
 - (1) Be based on management's needs and how the data will be used;
 - (2) Address all phases of DOCKET/new system (ICIS) data processing, e.g., identification, collection, input, deletion, quality assurance, etc.;
 - (3) Assign authority, responsibility, and accountability for each of the phases and processes; and
 - (4) Ensure all data elements applicable to an enforcement action are completed timely, accurately, and consistently.

- b. Develop and implement training coinciding with the issuance of new policies and procedures for all applicable personnel (e.g., attorneys, data entry, technical representatives, etc.).
 - c. Revise the User's Guide, Data Dictionary, and input forms to eliminate inconsistencies and to identify management requirements related to the data elements.
 - d. Formally communicate and reach agreement with the states regarding what information needs to be collected during inspections that may result in compliance actions. This information is necessary, per the guidance, to complete the CCDS.
3. In regard to the Quality Assurance Process:
- a. Develop and implement policies and procedures that establish a Quality Assurance process. OECA management should periodically monitor and review the Quality Assurance process. The Quality Assurance process should:
 - (1) Assign authority, responsibility, and accountability for Quality Assurance for each case to the person most knowledgeable about the case (attorney);
 - (2) Establish and document how often the procedures should be performed. The timing of the Quality Assurance reviews should be tied to management's information needs; and
 - (3) Be monitored and periodically reviewed by OECA management.

- b. To assist in the identification of missing data, develop standard reports that will identify missing or potentially missing data for each type of case and each relevant segment of information, (e.g., SEPs, Audit Policy, pollutant-related information, etc.), and have the regions review these reports as part of the Quality Assurance process.
4. With regard to populating and deploying the new system:
- a. Identify those cases that need to be brought into the new system (ICIS); and
 - b. Develop and apply a scrubbing process to the cases identified (prior to populating the system) to ensure that the data used to populate the new system is accurate and complete.

We recommend the Regional Administrators and EPA's Director of the Office of Regulatory Enforcement:

5. Develop and implement formal regional policies and procedures that:
- a. Implement OECA's policies and procedures effectively and efficiently at each site;
 - b. Establish lines of authority and communication across organizational segments to ensure that the data collected and maintained within the system is accurate, complete, timely, and consistent; and
 - c. Establish a monitoring process to:
 - (1) Verify the policies and procedures are being followed,

- (2) Continuously evaluate the efficiency and effectiveness of the processes, and
- (3) Identify opportunities to improve processes.

**Agency Comments
and OIG Evaluation**

Agency officials agreed with the causes identified in this report. They pointed out that it would be helpful if we could identify the inconsistencies we found during our review.

We provided them with examples of inconsistencies we found during our cursory review of the DOCKET User's Guide, Data Dictionary, and input forms. However, we believe that fixing the ones we noted does not fulfill management's responsibility to perform their own review and make applicable corrections.

Agency officials noted that our report does not present analysis based on data produced *after* the issuance of the guidance (related to estimating pollutant reduction results) in January 2001.

The sample cases selected were all opened prior to September 29, 2000. However, we verified the accuracy of the data, associated with the selected cases, as of the dates we performed the field work. We conducted field work for nine of the ten regions after the guidance was issued. The nine regions we visited after it was issued stated they had not started using the guidance yet.

The Agency asked us to clarify that Recommendation 2.d. refers to the information on the Case Conclusion Data Sheets for pollutant information. We clarified the recommendation, as requested.

Agency officials stated that they would respond to the specific recommendations upon receipt of the final report.

EXHIBIT

DETAILS ON SCOPE, METHODOLOGY, AND CRITERIA

Scope And Methodology

Congress asked the Inspector General community to both verify and validate the accuracy and reliability of performance data used to report on the Agency's GPRA annual performance goals. *Verifying* is the process of determining whether system data is accurate and complete (i.e., reliable), whereas *validating* entails determining whether an agency's key performance measures are consistent with its strategic and annual performance goals. Our audit was limited to *verifying* the accuracy and reliability of the data within DOCKET.

We selected two random attribute samples to help assess the accuracy and completeness of DOCKET data. We selected one sample for active cases and a second sample for deleted cases. We used the sample for active cases to perform source document verification for 53 key fields and input document verification analysis. We used the second sample to review support documents associated with the justification and authorization of deleted cases.

We also performed analysis of the complete DOCKET Database for edit checks and field relationships, as defined by the DOCKET Data Dictionary.

OECA management disclosed they were developing a replacement system for DOCKET entitled Integrated Compliance Information System (ICIS). As a result, we requested that regions identify what improvements they would like implemented in the replacement system. We also conducted a survey to determine the resources regions committed to develop and maintain systems for managing enforcement actions. We performed this survey because these systems were used in lieu of DOCKET.

Prior Audit Coverage

In March 2001, the OIG issued a report entitled "Enforcement: Compliance with Enforcement Instruments," (Report No. 2001-P-00006). The audit found that:

- OECA's annual accomplishment reports did not accurately represent the actual environmental benefits resulting from enforcement activities. For example, an OECA report stated that fiscal 1999 enforcement actions resulted in the reduction of more than 6.8 billion pounds of pollutants. However, this may have been an understatement

or overstatement since: (1) violators did not always comply with the enforcement instruments, and (2) data was not comprehensive. Also, OECA's performance measures were not sufficient to determine the program's actual accomplishments. Consequently, Congress had less useful performance data upon which to base its decisions.

- Regions did not always adequately monitor compliance with enforcement instruments nor did they always consider further enforcement actions. Ineffective monitoring was due primarily to the lack of: (1) guidance detailing how or when to monitor enforcement instruments, and (2) emphasis OECA placed on monitoring. Ineffective monitoring may have contributed to the regions not considering further enforcement actions for noncompliance with enforcement instruments. Consequently, there was a risk that (1) violations would continue and contribute to environmental harm or increased health risks, and (2) EPA's effectiveness, through deterrence, would be adversely impacted. The report listed instances where EPA had no evidence that significant violations had been corrected.

Criteria

Included below are summaries of criteria that were of particular importance to our audit field work and analysis:

Procedures for Maintenance of Enforcement Docket System

This memorandum, dated April 21, 1983, established the Enforcement Docket System as the official system for tracking and maintaining summary and status information about civil and criminal enforcement actions. The document was the official record of all litigation activity used for:

- Reporting to the Administrator regarding accountability measures,
- Responding to Congressional inquiries,
- Answering Freedom of Information Act requests, and
- Performing special analyses.

According to this source, the Lead EPA Attorney is responsible for completing the case input forms and giving them to the regional data analyst for assignment of a case number and initial data entry. The Lead EPA Attorney also has primary responsibility for the review and update of all active cases. In addition, the document establishes and assigns the responsibility for the quality assurance function to the Lead EPA Attorney.

Enforcement DOCKET Maintenance

This policy memorandum, dated April 8, 1988, identified specific responsibilities for the regional offices and EPA Headquarters. The document stated the primary responsibility for timeliness, accuracy, and completeness of DOCKET data resided with the Offices of Regional Counsel. Specifically:

- Regions were responsible for accurate updates at least monthly;
- Headquarters was responsible for accurate monthly update of Headquarters-initiated data fields;
- Headquarters would not amend regional data entry;
- Headquarters would continue to monitor overall data quality on a monthly basis for the balance of fiscal 1988, and thereafter on a quarterly basis. Headquarters would be responsible for bringing discrepancies to the attention of the Regional Counsel; and
- DOCKET maintenance would be considered part of the annual performance assessment discussion with Regional Counsels.

Quality Assurance of Active Civil Enforcement Case DOCKET

This policy, dated March 2, 1989, addressed the quality of the data in DOCKET. The document emphasized EPA's reliance on DOCKET information to (1) manage enforcement programs, and (2) respond to internal and external inquiries (e.g., Congress and the public). Furthermore, the policy decentralized the Agency's enforcement process by giving regions the authority and responsibility for initiating and following through on enforcement actions.

Support of the Enforcement DOCKET for Information Management in OECA

On October 3, 1994, this policy assigned the Regional Counsels primary responsibility for entering and maintaining data on all civil judicial and administrative enforcement actions. In particular, Regional Counsels were to ensure that:

- Every civil judicial and formal administrative penalty enforcement case was entered into DOCKET;
- All new formal administrative penalty actions, starting with fiscal 1995, were entered into DOCKET; and
- By the end of the second quarter of fiscal 1995, all administrative penalty orders that had been issued or filed but not yet concluded, were entered into DOCKET.

Clarification of Administrative Order Tracking Requirements

This policy memorandum, dated May 9, 1995, clarified administrative orders and, in particular, addressed the inefficiencies of dual data entry - that is, entering the same data into DOCKET and various program databases. This policy emphasized that all administrative penalty actions were to be entered into DOCKET. The document also reemphasized that DOCKET was to be the primary source for Enforcement data.

Tracking EPA Administrative Action in DOCKET

This policy memorandum, dated March 6, 1996, clarified that all EPA administrative penalty orders and orders for cost recovery, issued in fiscal 1996 and subsequent years, were to be entered into DOCKET. The document also reaffirmed that DOCKET was the official system for tracking and reporting on EPA civil judicial and administrative enforcement actions.

Guidance for Case Conclusion Data Sheet (CCDS) Reporting Improvements

This guidance, dated January 2, 2001, provided instructions and examples for collecting and computing pollutant-related enforcement data, used to describe the impact of enforcement actions on the environment.

APPENDIX 1

OECA COMMENTS TO DRAFT REPORT



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

DEC 19 2001

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: OECA Comments on Draft Report of Quality of Data in the Enforcement Docket System

FROM: *for* Sylvia K. Lowrance *Michael J. Grant*
Acting Assistant Administrator

TO: Patricia H. Hill, Director
Information Technology Audits Staff

Thank you for the opportunity to provide comments on your Draft Report. Your review of the Docket was timely as we are preparing to implement an enforcement management system called the Integrated Compliance Information System (ICIS) that will replace the current Enforcement Docket. Lessons learned from the Docket System will prove valuable as we go forward with the new system. I have attached specific comments on your report to this memorandum.

We think that your report overstates the unreliability of environmental benefit information in Docket while overlooking the fact that the Docket is reliable for the main purpose for which it is used--tracking and reporting EPA enforcement actions. Having said that, one of the primary values of the pollutant reduction calculations is demonstrating the environmental benefit of our enforcement cases. The first essential stage in that demonstration is establishing that there was a pollution reduction--which the data from Docket does. While the pollutant reductions or other benefits claimed are probably understated in Docket (an issue we will continue to address), we believe that demonstrating the environmental results of our enforcement program is a major step for moving our program management measures towards environmental outcomes, and one that has been emulated by a number of states. The development of ICIS will facilitate improved reporting of outcome-oriented information, but the information Docket currently provides has been of great value in identifying and analyzing the results we achieve.

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We readily admit that the area of pollutant reductions can and will be improved through training and management attention. As noted, we think that there has been significant under-reporting of pollutant reductions. That, however, is preferable to the easier, but less credible, alternative of overstating results. Our expectation is that the precision with which these estimates are made will continue to improve over time with more experience, guidance and training for our staff.

If there are any comments or questions about this response, please contact Frederick F. Stiehl, Director, Enforcement Planning, Targeting and Data Division, at (202) 564-2290.

Attachment

General Comments:

While we agree with many of the problems identified in the audit, we believe that the statement of audit results is overly broad, and that it creates an impression that the data available in Docket, based particularly on pollutant reductions, is so inaccurate as to be useless. A fairer representation of the findings, again on pollutant reductions, is that the data in Docket is likely to significantly understate the actual environmental benefits because pollutant amount fields are not completed for many cases where they could be.

Likewise, the audit findings convey the impression that the data from Docket cannot be relied upon to provide the basic information that Docket was created to track – the status of the civil judicial, and now administrative, caseload. We think that the data in Docket is adequate to serve that purpose. Docket was created as a system to track and manage the Agency's civil enforcement actions, but it was not intended to track and manage the full life cycle of a case--it functions awkwardly in that role. In the last few years, Regions have developed a need for such systems and have started to create their own. The new enforcement and compliance system under development by OECA, ICIS, is being designed both to track case status and to serve as a management tool for Regions and Headquarters.

In evaluating data quality, the auditors apparently applied the same assumptions about what is required to administrative cases as to judicial cases. A fairer representation of data quality would be made if the report specifically differentiated between civil judicial and administrative cases. The requirements are not the same for both. For example, case summaries and pollutants at the case level are not mandatory fields for administrative cases whereas they are required for judicial actions. Another example (applicable to both administrative and judicial multimedia actions) is the penalty amount by statute. It is not mandatory to track the penalty by statute-- only the total assessed penalty. As a result, the extent of error identified in the report is overstated. We had asked that you specifically differentiate the errors between these two areas in our comments on a previous draft of this report; however, this was not changed in this version.

Finally, the Docket system is blamed for what are arguably, management deficiencies. The report acknowledges that data entry is not the reason for the error rates, and this implies that data entry clerks are provided with inadequate or inaccurate data in the first place. We think that the report should be clear about the source of the problem so that corrective actions will be targeted appropriately. It doesn't matter what system is used if the data provided is inadequate in the first place. In all instances, where you can provide the details regarding results of this review, please provide them so that we can take steps to correct the problem.

Specific Comments:

EPA Under-Reported Environmental Impact:

OECA concurs that enforcement actions recorded in Docket that indicate expected environmental improvements-- pollutant reductions, treatment of contaminated material, or preventative management of potentially damaging substances--should include quantitative information.

To encourage more complete and accurate reporting of environmental benefits, OECA has worked with the Regions to ensure that pollutant reduction information is included in case conclusion data sheets. In January 2001, the Office of Compliance (OC) distributed specific guidance to support regional and headquarters staff in preparing quantitative estimates of pollutant reductions and in applying quality control processes to their enforcement-related environmental data overall. Additionally, we have developed a training module that will be delivered to managers and staff in Headquarters and Regions who are responsible for concluding and reporting on enforcement actions. The first session is December 18, 2001, and we plan to complete training for all 10 regions by the end of the 4th quarter.

While we agree that many cases that should have pollutant reductions reported do not, we do think that your opening statement that "information provided to Congress, the public, and EPA management was not reliable." is a substantial overstatement. The failure to report may result from a failure of management to sufficiently oversee or audit the work of those estimating the environmental benefits or it may be a result of a conservative approach to claiming environmental benefits. In any case, it does not suggest that what is reported is wrong -- only that it is an underestimate.

We do suggest that in your report you make clear that the pollutant reduction, treatment, and preventative substance management quantities identified are estimates, so that readers do not misunderstand this data as reductions that have already occurred, a point we have recently clarified - at the IG's suggestion - in documents intended to be released to the public.

GPRA Fields Inaccurate, Incomplete, or Unsupported:

After a comprehensive reading of the draft, we are not sure how your graph of 'inaccurate, incomplete, or unsupported' GPRA-related fields were derived nor what that allegation means. We have conceded above that there is under-reporting, and acknowledge that the data may include some incorrect reporting (which our training and guidance is intended to minimize). We will be glad to review and incorporate into our processes, as needed, specific information you can share in this area which would allow us to make corrections.

Deletion of Cases Not Properly Controlled

In practice, this has never been a problem. We give access to Docket personnel for the purpose of creating as well as deleting cases. When a case was deleted is not critical to managing our enforcement program.

Causes for Unreliable Docket Data Need to be Addressed

Docket's Policies, Procedures and Guidance Outdated and Inconsistent - Docket is criticized for not updating documentation and for not identifying data elements essential for performance reporting. It would be helpful if you could identify the inconsistencies found in Docket's policies and guidance in order that they can be corrected. The issue of what data is required is always a difficult decision because Regions (and states) need to keep the data entry burden as low as possible. In developing ICIS we plan to make a major effort to reach consensus with Regions on what data is required for programmatic purposes and so far as possible to build those requirements into the system business rules. Where there are inconsistencies between the system and documentation, please provide us with the specific details and we will make the corrections.

Guidance Not Provided for Addressing Pollutant Information - We are acutely aware that there are cases where a better job needs to be done in identifying what pollutant was reduced and by how much. We are taking additional steps to provide training to the regions to rectify this. Additionally, we acknowledge that the guidance we issued in January 2001 has not been fully successful in reaching and changing the reporting behavior for all enforcement and compliance technical and legal personnel who produce environmental information, which is why we are following through with training and management emphasis. Nevertheless, the conclusions in your report regarding estimated pollutant impacts relate to FY '98, '99 and '00 information. Your report does not appear to present analysis based on data produced after the issuance of our guidance in January.

Quality Assurance Guidance Reviews Not Performed - We agree that much more could be done in this area, subject to availability of resources, and we welcome any suggestions you have to offer. We are now in the process of developing a much more systematic approach to assessing data quality in all of our systems and plan to include Docket data in that effort.

Policies and Procedures Need Improvement - We expect to work closely with the Regions to ensure that there is a full understanding of policies related to data requirements and data entry. We expect that the business rules that are being built into ICIS will assist with this problem; however, it will take a concentrated effort by both Headquarters and Regional management to ensure that consistency is achieved among the Regions in maintaining the quality of data in the system.

Recommendations:

The OECA response will be made upon receipt of the Final Report. However, the recommendation that OECA "Formally communicate and reach agreement with the states regarding the required information that needs to be collected during inspections." should be revised so that it's clear that this refers to information on our Case Conclusion Data Sheets for pollutant information.

APPENDIX 2

REGIONAL INPUT FOR SYSTEM ENHANCEMENTS FOR ICIS

From December 2000 through May 2001, we visited each EPA Regional Office and Headquarters. During these visits, we asked each location to provide suggested improvements they would like to see incorporated into the Integrated Compliance Information System (ICIS).

Regions participated in OECA Focus Groups on the new system (ICIS), where they provided suggestions for design enhancements to meet their needs. Most regions did not provide a comprehensive list of suggestions because they had already provided them directly to OECA.

We received a total of 38 responses. All regions did not provide comments. The table below is not a complete listing of requirements from all locations visited. We grouped similar responses into categories and ordered the listing based on the number of responses received for each category. The table below summarizes the comments received.

Additional Considerations for the Development of ICIS (* Input Provided By EPA Regions and Headquarters)	
Number of Responses Received	Category
10	Improve Report Capabilities <ul style="list-style-type: none"> a. Improve report formats to reduce paper b. Add capability to detect and report missing data c. Integrate quality control process into system
7	Integrate Regional Systems' Capabilities <ul style="list-style-type: none"> d. Integrate the capabilities of regional systems such as Compliance Activity Tracking System (CATS), Super DOCKET, etc..
6	Improve Interface <ul style="list-style-type: none"> e. Make data easier to access the data f. Make Ad-Hoc Queries easier to run g. Make the screens more user-friendly
5	Improve Search Capabilities <ul style="list-style-type: none"> h. Make it easier to use i. Add the capability to see Defensive Cases j. Add the capability for managers to see milestones

Additional Considerations for the Development of ICIS (* Input Provided By EPA Regions and Headquarters)	
4	<p>Add New Features</p> <ul style="list-style-type: none"> k. Add automatic notification of missed milestones (e.g., e-mail) l. Add security to protect high-profile/high-dollar cases m. Add fields for supplemental referrals n. Add ability to hotlink to a source document
3	<p>Reduce Duplicate Entry of Data in Multiple Systems</p> <ul style="list-style-type: none"> o. Develop an integrated system that shares the data with all other related systems so that each applicable data element only has to be entered one time
3	<p>Improve Policy and Procedures</p> <ul style="list-style-type: none"> p. Require regions to use q. Allow entry of data by those most knowledgeable about the case information r. Standardize data codes

* NOTE: Not all regions and Headquarters offices provided comments. This list is not a complete listing of regional and Headquarters requirements.

APPENDIX 3

REPORT DISTRIBUTION

Recipient

Acting Assistant Administrator for Enforcement and Compliance Assurance (2201A)

Office of Inspector General

Inspector General (2410)
Assistant Inspector General for Audits (2421)
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Counsel (2411)
Editor (3A100)

EPA Headquarters

Agency Audit Followup Official (2710A)
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