Catalyst for Improving the Environment

Evaluation Report

Partnership Programs May Expand EPA's Influence

Report No. 2007-P-00003

November 14, 2006

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Abbreviations

EPA	U.S. Environmental Protection Agency
FTE	Full Time Equivalent
HFC	Hydrofluorocarbon
IAC	Innovation Action Council
ICR	Information Collection Request
OA	Office of the Administrator
OAR	Office of Air and Radiation
OARM	Office of Administration and Resources Management
OIG	Office of Inspector General
OPEI	Office of Policy, Economics, and Innovation
OPPTS	Office of Prevention, Pesticides, and Toxic Substances
ORD	Office of Research and Development
OSWER	Office of Solid Waste and Emergency Response
OW	Office of Water
PRA	Paperwork Reduction Act

Cover images: Logos of six of the U.S. Environmental Protection Agency's partnership programs.

At a Glance

Catalyst for Improving the Environment

Partnership Programs May Expand EPA's Influence

What We Found

Partnership programs may expand EPA's environmental influence. These programs may achieve this effect by broadening EPA's potential participant base and addressing environmental problems not governed by regulations. Partnership programs are diverse in staff size and budget levels. The number of EPA's partnership programs has grown in the last few years.

We found that partnership programs reported contributing to EPA's overall environmental mission. The majority of the programs also reported having annual goals and program outputs or outcomes. All 54 headquarters partnership program managers we spoke with stated that their program contributed to at least one EPA strategic goal. Thirty-eight managers reported that their programs contribute to more than one goal. In a few cases, managers said they work together to solve a large environmental problem. Partnership programs build on the Agency's traditional regulatory efforts, but are not intended as substitutes for regulations. Instead, some partnership programs work together with regulatory efforts to help participants go beyond compliance with existing regulations. Other programs work to address environmental concerns that are not governed by Federal regulations, such as recycling and climate change.

Many partnership program managers said they collect complete and reliable data that they then use to make changes to their programs. However, barriers to data collection, including data collection costs, exist. Partners and participants contribute to some partnership programs by sharing program tasks. In a few cases, this includes participants undertaking program management roles. However, this type of collaboration may make it difficult to determine the outcomes of individual programs.

Next Steps

The Agency has had difficulty in defining, identifying, and characterizing these programs. Managers claim that their programs help to achieve EPA strategic goals, but we have not yet gathered sufficient measurement and outcome data to verify that partnership programs are achieving these claims. Since as many as half of the programs receive marketing assistance through collaboration, as well as other in-kind services and occasional participation fees, we will need to conduct further evaluation work to determine:
1. How partnership programs manage their collaborative relationships.
2. How those collaborative relationships support program outcomes.

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

November 14, 2006

MEMORANDUM

SUBJECT: Partnership Programs May Expand EPA's Influence
             Report No. 2007-P-00003

TO: Luis Luna, Assistant Administrator
             Office of Administration and Resources Management

             Bill Wehrum, Acting Assistant Administrator
             Office of Air and Radiation

             James Gulliford, Assistant Administrator
             Office of Prevention, Pesticides, and Toxic Substances

             George Gray, Assistant Administrator
             Office of Research and Development

             Susan Bodine, Assistant Administrator
             Office of Solid Waste and Emergency Response

             Benjamin Grumbles, Assistant Administrator
             Office of Water

             Brian Mannix, Associate Administrator
             Office of Policy, Economics and Innovation

This is our report on the subject of U.S. Environmental Protection Agency (EPA) partnership programs conducted by the EPA Office of Inspector General (OIG). This report represents the opinion of the OIG and does not necessarily represent the final EPA position.

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 $293,349.21.

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 staffs have any questions regarding this report, please contact me at 202-566-0847, Jeff Hart, Assignment Manager, at 303-312-6169, or Thane Thompson, Project Manager, at 513-487-2361.

Sincerely,

Bill A. Roderick
Acting Inspector General

cc: Marcus Peacock, Deputy Administrator

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Chapter 1
Introduction

Purpose

Over the last few years, EPA has worked to develop new types of environmental solutions. Recently, the Agency has begun relying on partnership programs to complement traditional regulatory approaches to protect the environment. To address whether partnership programs are meeting their environmental goals, we searched for existing Agency information about these programs. However, no current or central set of information described what each of these programs did, how they contributed to EPA's overall mission, or how EPA managed these programs. Therefore, we identified a group of headquarters partnership program managers and surveyed them on the following topics.[1]

1. What are the characteristics of partnership programs?
2. How do partnership programs contribute to EPA's overall mission?
3. How are individual partnership programs managed?

Background

EPA has implemented partnership programs for more than 20 years. These programs address a variety of environmental and human health problems, including loss of wetlands and pesticide exposure. They also address water and energy use, recycling, or the environmental actions of individuals. Some partnership programs report very small budgets and only a fraction of a staff member's time devoted to operating them. Other programs reported they have dozens of staff with budgets in the tens of millions of dollars. Partnership programs reported wide diversity in their environmental focus, program benefits, and participant groups. Nearly all program managers said their programs encourage participants to voluntarily engage in environmentally beneficial activities that are not covered by regulations. Managers said their programs offer opportunities to go beyond compliance, or work to solve non-regulated environmental or human health problems.

EPA has recognized the importance of better coordination across all partnership programs. This includes enhanced accountability for sound program design and improved strategic management of programs. In June 2004, EPA's Innovation Action Council[2] was charged with partnership program oversight by then Acting Deputy Administrator Stephen Johnson. The Partnership Program Coordination

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[1] Detailed results are located in Appendix B.
[2] Established in 1996, the Innovation Action Council (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.

Team was created to develop general program guidelines and improve support for partnership program managers. Since its inception, the coordination team has issued several guidance documents. The team has also provided training and one-on-one coaching sessions, and worked to stay in regular contact with many of the partnership programs. However, the coordination team has limited authority to require specific program management processes or consistent outcome reporting.

EPA has had difficulty defining, identifying, and characterizing its partnership program population. These programs have been grouped into numerous overlapping categories, including "Voluntary Programs," "Partnership Programs," and "Stewardship Programs." In December 2003, EPA reported that it had approximately 75 "Voluntary Programs." Just 2 years later, in 2005, EPA reported approximately 133 EPA "Partnership Programs." According to the Office of Policy, Economics, and Innovation (OPEI), this change is due to both an increase in the overall program population and in the way these types of programs are defined. OPEI informed us that the 2005 report used a broader definition of "partnership program" than the 2003 report.

Scope and Methodology

EPA's definition of partnership programs has continued to evolve during our review. For the purpose of this evaluation, we define a partnership program as "A program currently operated by a Headquarters program office that is national in scope, and that works to encourage participants to voluntarily engage in environmentally beneficial activities." In consultation with the OIG, each EPA program office provided us with a list of partnership programs that met our criteria. This list resulted in a universe of 54 partnership programs operated by seven different program offices. We have included a list of the programs we reviewed in Appendix A.

We developed a survey to collect partnership program information and administered the survey through a telephone interview with each partnership program. We sent completed interviews to each partnership program for data verification. We did not independently verify the responses for accuracy. For more information on the survey questions and program responses used in this report, please see Appendix B.

This evaluation builds on a previous report, "Ongoing Management Improvements and Further Evaluation Vital to EPA Stewardship and Voluntary Programs" (2005-P-00007), issued in February 2005. In that report, we recommended that EPA should address management issues, including strategically planning, coordinating, and managing its voluntary programs.

This evaluation was performed in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States. We reviewed management controls of the Agency-wide guidance regarding the design and measurement of partnership programs.

Partnership Programs in Brief

Seven different program offices operate EPA's headquarters partnership programs. The number of programs operated by each office varies from 23 in OAR to 1 each in OARM and ORD. See Table 1-1.

Table 1-1. Partnership Program Distribution

Number of Programs	EPA Program Office
23	Office of Air and Radiation (OAR)
12	Office of Prevention, Pesticides, and Toxic Substances (OPPTS)
8	Office of Water (OW)
6	Office of Solid Waste and Emergency Response (OSWER)
3	Office of the Administrator (OA)
1	Office of Acquisition and Resource Management (OARM)
1	Office of Research and Development (ORD)

The oldest partnership program still in operation began in 1985 (Radon), though the median program age is 7 years. Figure 1-1 captures programs that were operating on December 31, 2005. Any programs that were being developed and have subsequently been launched, or are no longer operated by EPA, are not included in this chart. See Figure 1-1.

Figure 1-1. Growth of Partnership Programs
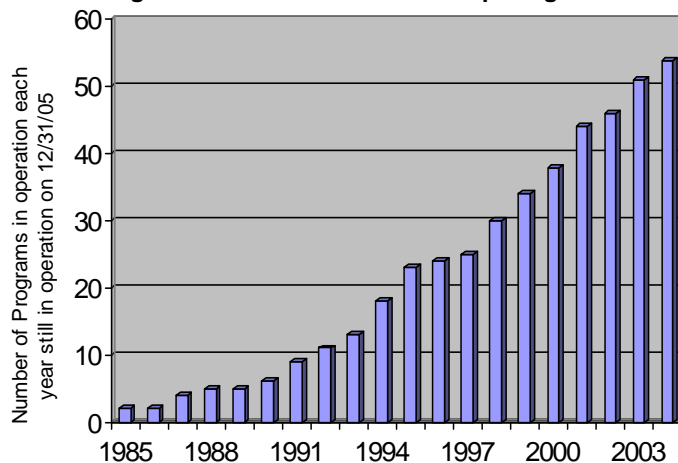
Since partnership programs encourage their participants to voluntarily engage in environmentally beneficial activities, they often give participants program benefits as an incentive to change their behavior. Program managers reported offering a variety of benefits to participants. As Figure 1-2 shows, most programs

Figure 1-2. Number of Programs Offering Each Benefit

Types of Program Benefits Offered

- ☐ Regulatory Flexibility
- ☐ Networking
- ■ Environmentally Preferable Product Designation
- ■ Other unique benefits
- ☐ Competitive Business Solutions
- ☐ Public Recognition
- ☐ EPA/State Partnership Opportunities
- ☐ Information
- ■ Technical Assistance
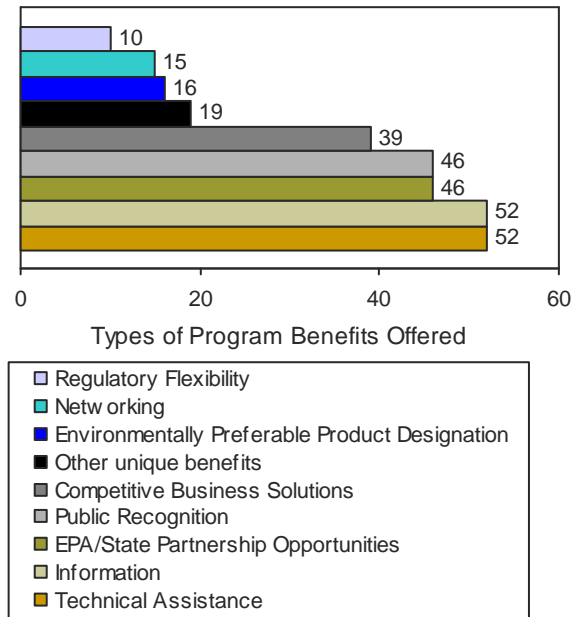
provide technical assistance and information; relatively few provide regulatory flexibility. Only one program provided fewer than three of the program benefits listed in this figure. Most programs provided between five or six benefits; two programs provide eight of these benefits to their participants. Each program benefit is defined in the glossary, located in Appendix C.

Partnership programs often require participants to meet program-specific commitments. We identified three types of partnership program commitment approaches, including formal requirements, informal requirements, and no commitment requirements. Programs with formal requirements may ask participants to sign a memorandum of understanding, and may even remove participants from the program if they do not meet commitments. Programs using informal requirements may ask participants to submit data or participate in periodic meetings. Programs that have no commitment requirements may simply provide information or ask participants to achieve environmental outcomes in good faith. See Figure 1-3.

Figure 1-3. Program Commitment Approaches

No Commitment Requirement 30%

Formal Requirement 31%

Informal Requirement 39%

Figure 1-4. Partnership Program Budgets
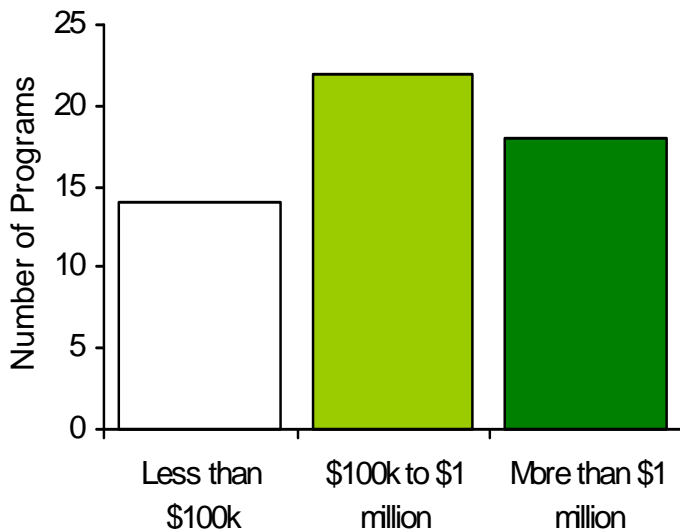
Partnership program managers said their annual budgets total an estimated $352 million.[3] One of these programs (National Non-Point Source Pollution Program) reported a budget of more than $209 million. Of the remaining programs, 36 reported budgets of $1 million or less, and two program managers said they had no budget at all. The median program budget is $492,500. Program budgets may not, however, take into account the total costs of implementing these programs, such as in-kind participant contributions. See Figure 1-4.

Figure 1-5. Distribution of Partnership Program Staff

- less than 1 FTE
- 1 to 2 FTEs
- more than 2, to 5 FTEs
- more than 5 FTEs
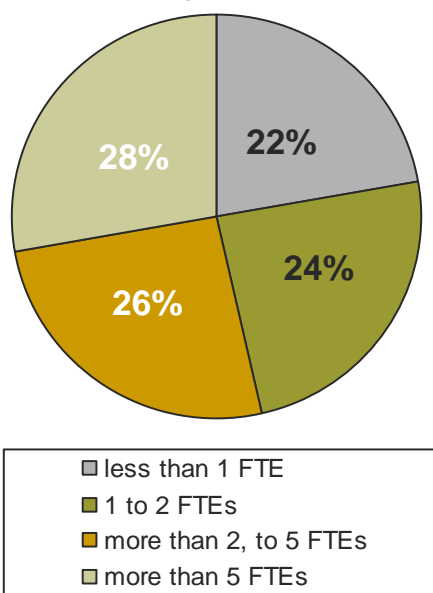
Most partnership programs operate with relatively few staff (hereinafter full time equivalent, or FTE). Program managers reported that a total of 365 FTEs run these programs, though the median number of program staff is 2.65. As shown in Figure 1-5, 72 percent (39 of 54) of partnership program managers said they have fewer than 5 FTEs.

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[3] This total was derived from the question, "What is your annual budget in dollars?" However, some programs provided estimates or noncurrent year totals.

Partnership programs provide their benefits to many different types of participants, such as individuals, schools, or industry. Although 7 of the 54 programs only served 1 type of participant, most programs served 4 or more of the participant types listed in Figure 1-6.

Figure 1-6. Partnership Program Participants

Number of Programs Serving Each Participant Type

- Federal Agencies
- Individuals
- Schools / Universities
- Non-profit
- State/Local Government
- Industry/Business
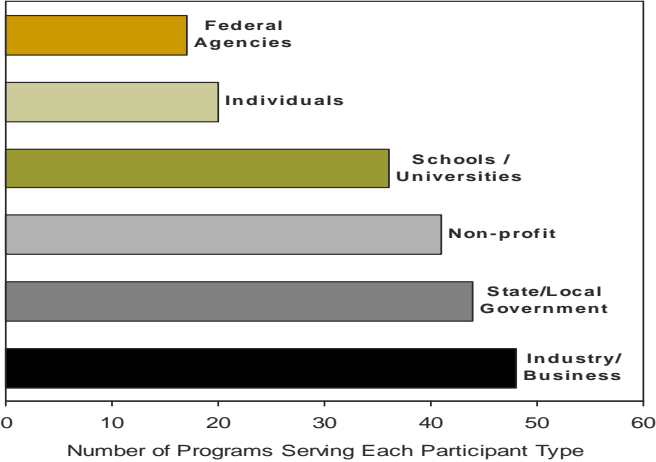
Chapter 2
Partnership Programs May Help EPA Expand its Potential Audience

Partnership programs may have expanded the potential audience that can help EPA accomplish its overall environmental and human health mission. Program managers said their programs, as a group, impact all five strategic goals. Many managers reported that their programs provide a diverse set of benefits to a broad group of participants. Some of these participants include nongovernmental organizations and individuals. Some program managers said they work in conjunction with the Agency's traditional regulatory activities. Other program managers said that they help participants voluntarily protect the environment where there are no Federal regulations. In some cases, programs may attempt to provide solutions in lieu of environmental laws or regulations. While partnership programs may make contributions to EPA's mission, it is necessary to conduct future evaluation work to determine if program outcomes are being achieved.

Partnership Programs May Help Achieve Several Strategic Outcomes

Partnership programs may help achieve several strategic outcomes. In some cases, several programs work on a single environmental problem. Or, a single program can be spread wide enough to encompass several related environmental issues. Most program managers said their programs develop annual goals, and all assert that their programs contribute to one of EPA's strategic goals.

All 54 program managers identified one EPA strategic goal as their program's area of primary impact. We also asked each manager to identify other strategic goals that their program impacts. Because of the large number of OAR programs, the largest number of program managers listed *Goal 1: Clean Air and Global Climate Change* as their primary impact. However, 38 of the 54 program managers claimed their program supports at least two strategic goals. Also, 14 asserted that their programs support all five strategic goals. An example of these

Table 2-1. Partnership Programs Reported Support for EPA's 2003-2008 Strategic Goals

Strategic Goal	Primary Impact	Secondary Impact	Totals
Goal 1: Clean Air and Global Climate Change	24	17	41
Goal 2: Clean and Safe Water	7	21	28
Goal 3: Land Preservation and Restoration	4	13	17
Goal 4: Healthy Communities and Ecosystems	7	27	34
Goal 5: Compliance and Environmental Stewardship	12	21	33

reported multi-goal outcomes includes the AgStar program, which focuses primarily on methane emission reduction activities (Goal 1). As a result, the program claimed that organic loading into waterbodies has been reduced (Goal 2). In another example, the Smart Way Transport program focuses on reducing greenhouse gas emissions (Goal 1) from diesel engines used in the trucking industry. According to the manager, the program also claims to have significantly reduced particulate matter. This pollutant has been linked to asthma attacks in sensitive populations (Goal 4). These outcomes show that partnership programs may have an expanded influence on environmental problems beyond their primary goal or audience.

Several programs reported that they work to solve a single overarching environmental problem. These "umbrella" efforts can be undertaken by one large and diverse program, or can be the result of several individual programs. For example, the Indoor Air Quality program manager outlined several subprograms, each focusing on a separate issue. These programs include indoor air quality in elementary and secondary schools, asthma, radon, and secondhand smoke. Some groups of programs focus on the same problem, but with different participant groups. For example, six program managers said their programs work to reduce methane emissions from sources as widespread as animal operations, coal beds, landfills, and power production facilities. In contrast to umbrella efforts, almost half of our respondents claimed that their program was unique and did not overlap with any other EPA partnership program. These programs address a range of niche environmental issues, including diverting electronic waste from landfills, or helping magnesium manufacturers reduce greenhouse gas emissions.

The strategic outcomes of partnership programs may be difficult to determine because a shared definition of effectiveness across partnership programs does not exist. Some managers defined effectiveness as program participation rates. Others defined it as the environmental outcomes the program achieved. In some cases, managers defined effectiveness in terms of their costs to achieve program outputs or environmental outcomes. The extent that these definitions vary complicates EPA's ability to determine the overall effectiveness of partnership programs. Further, EPA does not have guidance that defines program effectiveness.

Program Managers Report Serving a Broad Participant Group

Partnership programs may help EPA reach a broad group of participants. Types of program participant groups can range from narrow user groups defined by their use of a single chemical, to entire industry populations. For example, the HFC (Hydrofluorocarbon) 23 Emission Reduction Program manager said the program works to reduce the use and emission of one specific ozone-depleting refrigerant. While the manager said only three manufacturing facilities in the United States use this chemical, all three facilities participate in the program. Those participants also receive ongoing technical assistance to reduce their HFC 23

emissions. In contrast, the Environmental Technology Verification Program manager said the program has tested over 350 technologies and has more than 800 stakeholders.

Programs managers reported that they offer several program benefits. As shown in Table 2-2 below, almost all partnership programs offer technical assistance and information as benefits to their participants. In addition to the benefits listed here, 35 program managers said they provided other types of benefits to participants. These benefits include, for example, grants, increased public awareness of the environmental problem, or specific program outcomes. Managers reported 19 additional benefits that were unique and did not fit into any specific category.

These benefits included "improved quality of life," "improved corporate environmental image," and "helping individuals become engaged as stewards of their watershed." These

Table 2-2.   Number of Programs Offering Each Benefit

# of Programs	Type of Benefit
52	Technical Assistance
52	Information
46	EPA/State Partnership Opportunities
46	Public Recognition
39	Competitive Business Solutions
16	Environmentally Preferable Product Designation
15	Networking
10	Regulatory Flexibility

types of benefits further demonstrate the diversity of partnership programs. They further serve as examples of the efforts that these managers reported making to tailor their services to the needs of their participants.

Some partnership program managers also reported working with several different types of participants to solve a particular environmental problem. For example, the managers for both the Pesticide Environmental Stewardship Program and the Energy Star Energy Management Program told us that they have private sector participants who actively engage in voluntary activities. However, these managers also said they work with nonprofit organizations and community participants that are actively involved in helping keep the program running. Several programs sometimes included these program partners in an overall program participant count because while they are an integral part of the program, they are not the primary target participant. We discuss these types of collaborative efforts, as well as the benefits and challenges that partner collaboration provides, in the next chapter.

Program Managers Report That Regulatory Relationships Vary Significantly

EPA has traditionally worked to protect human health and the environment by serving in the role of regulator. EPA enforces environmental statutes, typically through using penalties for regulatory noncompliance. In contrast, partnership programs encourage their participants to voluntarily engage in environmental

activities by offering various benefits. EPA has begun relying on partnership programs as another tool for protecting the environment. Because of this reliance, we assessed the relationships these programs have with traditional regulatory programs. We found that there is not an either/or relationship between partnership programs and regulatory activities. Rather, we found that partnership programs can have several types of regulatory relationships that, together with traditional regulation, may reach a broader audience and achieve additional environmental outcomes.

Half of the 54 partnership program managers said their programs work in conjunction with environmental regulations. Some reported offering regulatory flexibility or providing opportunities for participants to go beyond compliance with existing regulations. These programs work with a variety of laws. The majority of program managers identified a relationship with one of the following statutes: the Clean Air Act, the Clean Water Act, the Resource Conservation and Recovery Act, or the Toxic Substances Control Act. These programs encourage full compliance with environmental laws, and urge their participants to voluntarily go beyond these standards to achieve greater environmental results.

Most of the other managers we interviewed said their programs focus on environmental problems not governed by regulations. These programs sometimes recruit community groups or individual citizens. Neither of these groups typically falls within the traditional regulated community. Many of the programs in this category also recruit businesses, States, and other participants who usually are the focus of traditional regulations. Regardless of their focus, these programs work to encourage participants to solve environmental problems not covered by regulations. For example, 18 program managers said their programs were designed to target global climate change. These efforts support both the United States Climate Change Action Plan and the 2002 Global Climate Change Initiative. This example shows that in some cases, partnership programs may be designed to address environmental problems where specific regulations do not exist.

Finally, we found that some programs can have several different regulatory relationships at the same time. For example, one manager reported that their program can offer regulatory flexibility, help participants go beyond compliance with existing Federal regulations, and encourage participants to voluntarily protect the environment where there are no Federal regulations. In two cases, program managers reported that the results of their programs are used to either develop or meet regulations.

Conclusion

Partnership programs may make contributions to the Agency's overall mission. Managers claim that their programs help to achieve EPA strategic goals, expand the Agency's participant groups, and work to expand the agency's relationships

beyond the traditional regulated community. However, we have not yet gathered sufficient measurement and outcome data to verify that partnership programs are achieving these claims. Because of this, future evaluation work needs to be conducted to assess the extent to which each program is achieving its intended outcomes.

Chapter 3
Data Availability and Partner Collaboration
Impact Program Management

Many partnership program managers said they believe they collect complete and reliable data. The managers said they use the data to make changes to their programs, but barriers to data collection, including data collection costs, exist. Program managers said that their partners and participants contribute to EPA's partnership programs by sharing program tasks. In a few cases, they said participants can even undertake program management roles. This collaboration, however, may introduce additional challenges to determining the outcomes of individual programs. Because collaboration can expand the overall scope of programs, we will need to conduct further assessment to determine how programs manage their collaborative relationships, and how those relationships support program outcomes.

Managers Report That Trusted Data Inform Program Decisions, but Barriers Remain

Managers expressed a high level of confidence in the reliability of their program data. We asked managers to rate the reliability of their data on a scale of 1 to 4. As Figure 3-1 demonstrates, about twice as many program managers rated their data as the most reliable, or "4," compared with those rating their data as a "3." Confidence in data reliability was associated with having sufficient data. Those program managers who rated their data as a "3" were about twice as likely to say data they were not currently collecting would improve program management as those

Figure 3-1. Reported Reliability of Program Data

1 is least reliable, 4 is most reliable

managers who responded with a "4." Overall, fewer than half of the managers responded that data they were not collecting might improve program management.
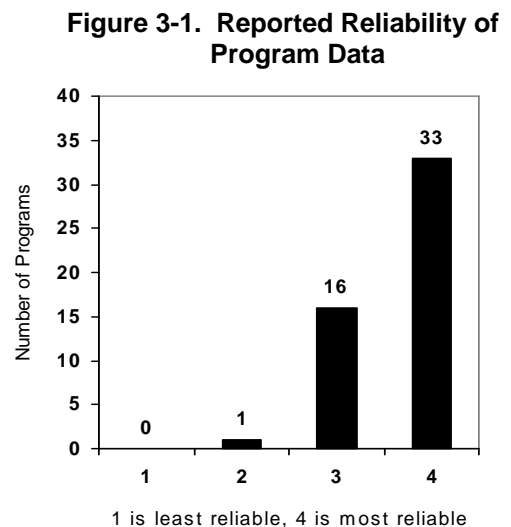
Many partnership program managers said they use their data to change their programs. For example, they changed the program services offered to participants, changed the target participants, changed internal program operations,

or even changed program goals. One program manager offered that "If emission reductions aren't meeting program goals, then we evaluate what additional efforts are necessary to achieve those goals." The program manager for the Indoor Air Quality program said that their "Asthma Survey revealed some asthma triggers where focus was lacking. This information was used to focus more on these triggers."

Another type of data some program managers can use is the results of cost-benefit analyses. About half of the program managers responded that they had performed a cost-benefit analysis for their partnership program. Some program managers then characterized success based on an ability to implement the program cost effectively. Specifically, 11 program managers defined success for their programs in terms of dollars spent per output or dollars spent per outcome; 6 of the 11 said they had conducted a cost-benefit analysis.

Across all partnership programs, the most frequently cited barriers to getting environmental outcome data were that a partnership program cannot require data submission, and that collected data may not be completely accurate. One issue raised by some program managers was the cost of data collection. In fact, 10 program managers asserted that data that might improve program management were not collected because the cost was too expensive. Capturing appropriate and adequate data is central to tracking program outcomes and making improvements to partnership programs. Without needed data, these programs may be hindered in their ability to demonstrate program success or adapt to changing partner and participant needs. Four program managers cited the difficulty of linking data to environmental outcomes as a general barrier. Other reported barriers included the nature of some environmental data as proprietary and therefore sensitive, and barriers posed by the Office of Management and Budget's information collection request process.[4] Four other program managers reported that they do not collect any data at all. Of these, three managers mentioned access to data as a top challenge to fully achieving their expected program outcomes.

Collaboration Can Provide Benefits, but May Pose Management Challenges

Partnership programs can benefit from collaborative relationships with their partners and participants. Program managers reported that they regularly collaborate with other government organizations. This collaboration includes sharing program tasks with their partners. In some cases, partners and participants can even undertake some program management roles. However, collaboration may introduce additional program management challenges, such as restricted EPA decisionmaking roles and joint EPA-partner goal-setting. Further, collaboration may complicate determining individual program outcomes.

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[4] According to the Paperwork Reduction Act (PRA) of 1995, Federal agencies must seek OMB approval prior to collecting data from 10 or more members of the public.

Program managers said they often collaborate with a number of government agencies or organizations to complete program tasks (see Table 3-1). Program managers said this collaboration fulfills multiple purposes. One purpose is to help programs

Table 3-1. Number of Programs That Report Collaborating with Government Agencies or Organizations

Government Agency or Organization	Number of Programs
EPA Regions	45
States	44
Other Federal Agencies	44
Other EPA Partnership Programs	42
EPA Regulatory Programs	30

with similar outcome goals properly account for the measured or observed environmental outcomes of each program. For example, of the 18 programs that address climate change, 6 programs reported that they have a process to attribute the appropriate amount of emission reductions that each program can claim. In this way, partnership programs share the task of allocating measured outcomes. Another purpose for collaboration is to track if participants in one program are also members of other partnership programs, as participants may enroll in more than one program. Managers for nine partnership programs said they collaborate with each other to track participant enrollment. A third purpose given for collaboration is obtaining data for tracking environmental program outcomes. Some programs use data collected by other Federal agencies. For example, 10 EPA program managers said they get the information they need to implement and manage their programs from other Federal agencies, such as from the U.S. Census Bureau.

Program managers also reported collaborating with their participants. Many managers said they ask their participants to engage in marketing and recruitment efforts. Nineteen managers even described their partners and participants as a central component in their marketing strategy. Further, three program managers said they require participants to market or promote the program as part of their commitment.[5] This work-sharing may allow program managers to focus on other aspects of program management.

Managers said that another way that participants assist with program implementation is by supplying funds. At least three managers said that their participants share the costs of the program by paying a participation fee. However, 11 program managers reported concerns that the costs of participation may limit their program from fully achieving its expected outcomes. For

Table 3-2. Tasks Accomplished by Collaboration

✓ Allocate outcomes among other programs
✓ Track participant enrollment
✓ Get data used to track outcomes
✓ Share program marketing responsibilities
✓ Share program costs

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[5] One program manager responded both that partners and participants are central to their marketing strategy, and their programs require participants to market or promote the program as part of their commitment.

example, several program managers cited the high cost of technology or equipment. This may demonstrate that some partnership program managers recognize the need to be sensitive to the expenses of their participants. Managers reported several tasks where participants contribute to program operations. These tasks are listed in Table 3-2.

Managing programs jointly with other agencies or organizations is not uncommon. A few program managers said they have developed different types of co-management relationships with their partners and participants. However, each is accompanied by its own limitations. For example, one manager said their program shares application review responsibilities with a nonprofit partner organization. This process determines which participants are allowed in the program. There may be the potential for perceived bias when programs engage in this type of collaboration. Another manager said their program distributes technical standards to participants through a partner Federal agency. Though EPA develops these standards, the manager depends on their partner agency to communicate these standards to its participants. If this information is not communicated correctly to participants, it is possible that program outcomes will suffer.

Another type of collaboration process can restrict EPA's decisionmaking role in a partnership program. The annual and overall outcome goals of the Carpet America Recovery Effort program are reportedly established jointly by industry, nongovernmental associations, and government agencies at the Federal, State, and local levels. EPA is only one of many stakeholders making decisions about this program. In fact, four program managers said they are not the sole actor in determining their program's participation goals.

Table 3-3. Some Factors Included in Calculating Total Implementation Cost

• Basic program budget
• In-kind contributions
• Fees paid by participants

Program collaboration may complicate EPA's ability to determine program outcomes and total implementation costs. As listed in Table 3-3, the complete cost of implementing a partnership program can include other aspects in addition to a basic program budget. Our analysis shows that most – if not all – aspects of assessing costs are complicated by program collaboration. For example, 11 program managers said their budget was only partially funded by their own program office. One program manager responded that the program was funded entirely by another program office within EPA. Another said their budget was set by a congressional earmark and has not been established as an annually-funded activity. To establish comparable costs for some partnership programs, it may be necessary to include implementation costs from other EPA program offices or even other Federal agencies.

Many program managers said that collaboration provides their program with in-kind services from partners or participants. As mentioned earlier these services can include marketing activities or participant screening and registration. All of these services can be considered part of a program's total implementation costs, but may be difficult to value. Further, as mentioned earlier, several programs report difficulty getting proprietary data from private entities. It is therefore important to determine the extent that programs rely on collaboration to collect data used to measure outcomes.

Conclusion

Partnership program managers consistently claim to use data to make changes to their programs. Further, collaboration plays a significant role in the management of most partnership programs, as nearly half of the programs claim they receive marketing assistance through collaboration, as well as other in-kind services and occasional participation fees. As a result, we will need to conduct further evaluation work to determine how programs manage their collaborative relationships, and how those relationships support program outcomes.

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

No Recommendations

[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 Partnership Programs Reviewed

The following 54 partnership programs (listed alphabetically) met our evaluation criteria and were verified by EPA program offices as being in operation on December 31, 2005.

Partnership Program Name	Program Office
Adopt Your Watershed	Office of Water
AgStar	Office of Air and Radiation
Best Workplaces for Commuters	Office of Air and Radiation
Carpet America Recovery Effort	Office of Solid Waste and Emergency Response
Clean School Bus USA	Office of Air and Radiation
Clean Water Act Recognition Awards	Office of Water
Climate Leaders	Office of Air and Radiation
Coal Combustion Products Partnership	Office of Solid Waste and Emergency Response
Coalbed Methane Outreach Program	Office of Air and Radiation
Combined Heat and Power Partnership	Office of Air and Radiation
Decentralized Wastewater Treatment Systems Program	Office of Water
Design for the Environment	Office of Prevention, Pesticides, and Toxic Substances
Diesel Retrofit Program	Office of Air and Radiation
Energy Star Energy Management	Office of Air and Radiation
Energy Star Product Certification	Office of Air and Radiation
Environmental Technology Verification Program	Office of Research and Development
Environmentally Preferable Purchasing	Office of Prevention, Pesticides, and Toxic Substances
EPA's Volunteer Monitoring Program	Office of Water
Federal Electronics Challenge	Office of Prevention, Pesticides, and Toxic Substances
Five-Star Restoration Program	Office of Water
Green Chemistry	Office of Prevention, Pesticides, and Toxic Substances
Green Engineering	Office of Prevention, Pesticides, and Toxic Substances
Green Power Partnership	Office of Air and Radiation
Green Suppliers Network	Office of Prevention, Pesticides, and Toxic Substances
GreenScapes	Office of Solid Waste and Emergency Response
HFC 23 Emission Reduction Program	Office of Air and Radiation
High Production Volume Challenge	Office of Prevention, Pesticides, and Toxic Substances
Hospitals for a Healthy Environment	Office of Prevention, Pesticides, and Toxic Substances
Indoor Air Quality	Office of Air and Radiation
Labs 21	Office of Administration and Resources Management
Landfill Methane Outreach Program	Office of Air and Radiation
Methane to Markets Partnerships	Office of Air and Radiation
Mobile Air Conditioning Climate Protection	Office of Air and Radiation
National Award for Smart Growth Achievement	Office of the Administrator
National Fish and Wildlife Contamination Program	Office of Water
National Non-Point Source Management Program	Office of Water
National Partnership for Environmental Priorities	Office of Solid Waste and Emergency Response
Natural Gas Star	Office of Air and Radiation
Partnership for Safe Water	Office of Water
Performance Track	Office of the Administrator
Pesticide Environmental Stewardship Program	Office of Prevention, Pesticides, and Toxic Substances
PFC Emission Reduction Partnerships for Semi-Conductor Industry	Office of Air and Radiation
Plug-In to eCycling	Office of Solid Waste and Emergency Response
Radon	Office of Air and Radiation
Reduced Risk for Conventional Pesticides	Office of Prevention, Pesticides, and Toxic Substances
Sector Strategies	Office of the Administrator
SF-6 Emission Reduction Partnership for Electric Power Systems	Office of Air and Radiation
SF-6 Emission Reduction Partnership for the Magnesium Industry	Office of Air and Radiation
Smart Way Transport	Office of Air and Radiation
Sustainable Futures	Office of Prevention, Pesticides, and Toxic Substances
The SunWise School Program	Office of Air and Radiation
Voluntary Aluminum Industrial Partnership	Office of Air and Radiation
Voluntary Children's Chemical Evaluation Program	Office of Prevention, Pesticides, and Toxic Substances
WasteWise	Office of Solid Waste and Emergency Response

Summary of Survey Responses

As discussed in the Scope and Methodology section of Chapter 1, we supported the statements made in this report with evidence obtained through structured interviews with partnership program managers. We have included those survey questions and responses below. The information below relates how the interviewees responded to each question; these responses are provided from the program's perspective. In some cases, the number of responses provided for a question will total to more than our population of 54 programs, as some programs gave more than one answer to an open-ended question. For example, when responding to "How is this program marketed to potential participants?" many program managers provided more than one answer. We have not independently verified these responses through documentary evidence

---

What EPA office and division is this program in?

Frequency	Program Office	Office/Division
23	OAR	
	17	Office of Atmospheric Programs
	4	Office of Transportation and Air Quality
	2	Office of Radiation and Indoor Air
1	OARM	
	1	Facilities Management and Services Division
3	OA	
	1	Office of Development, Community and Environment Division
	2	Office of Policy, Economics and Innovation
12	OPPTS	
	3	Economics, Exposure and Technology Division
	2	Office of Pesticide Program
	4	Pollution Prevention Division
	3	Risk Assessment Division
1	ORD	
	1	National Risk Management Research Lab
6	OSWER	
	5	Municipal and Industrial Solid Waste Division
	1	Waste and Hazardous Waste Minimization & Mgmt Division.
8	OW	
	1	Office of Groundwater & Drinking Water
	1	Office of Science and Technology
	1	Office of Wastewater Management
	5	Office of Wetlands, Oceans and Watersheds

What year did this program begin?

Frequency	Year	Frequency	Year	Frequency	Year	Frequency	Year
2	1985	1	1990	5	1995	4	2000
0	1986	3	1991	1	1996	6	2001
2	1987	2	1992	1	1997	2	2002
1	1988	2	1993	5	1998	5	2003
0	1989	5	1994	4	1999	3	2004

I am going to read EPA's 5 Strategic Goals, as listed in EPA's 2003-2008 Strategic Plan. Under which of the following goals is this Voluntary Program structured?

Goal	# of Programs
1. Clean Air and Global Climate Change	24
2. Clean and Safe Water	7
3. Land Preservation and Restoration	4
4. Healthy Communities and Ecosystems	7
5. Compliance and Environmental Stewardship	12

Does this voluntary program impact any other Strategic Goal? As I read them all again, please indicate whether or not this program impacts the Strategic Goal:

	Primary Impact	Impact	No impact	Don't Know	No answer
Clean Air and Global Climate Change?	24	17	12	1	0
Clean and Safe Water?	7	21	25	1	0
Land Preservation and Restoration?	4	13	34	2	1
Healthy Communities and Ecosystems?	7	27	18	2	0
Compliance and Environmental Stewardship?	12	21	20	1	0

Does this program support a strategic objective within EPA's Strategic Plan?

   53   Yes
    1   No

Does the program have annual goals?

   40   Yes
    9   No
    5   Other

What environmental problem does the program address?

11	Human health
9	Air (other/none)
7	Water
4	Land
5	Ecosystem / community
16	Multi-media
18	Air (greenhouse gas reduction / climate change)
4	Other

Does this program help participants go beyond compliance with an existing Federal regulation?

27	Yes
24	No
3	Other

How do you define effectiveness for this voluntary program?

9	Dollars spent per environmental outcome
31	Environmental outcomes (no costs mentioned)
2	Dollars spent per program output
3	Outputs - GPRA / PART mentioned
24	Outputs - Participation rates
13	Other

Do you use data to track the environmental outcomes for this program?

50	Yes
4	No data at all

Where does the existing data (*data collected by someone else*) come from?

6	Participants
10	Other Federal agencies
12	Trade Associations / Industry sector
4	Other government organizations (States, regions, etc)
5	Existing EPA databases
10	Other
25	Not applicable

On a scale of 1 to 4, where 1 is the least and 4 is the most, how reliable would you say the data you use is?

    0   1 *the LEAST reliable*
    1   2
    16   3
    33   4 *the MOST reliable*
    4   Not applicable

Do you use this data to make changes to the program?

    41   Yes
    6   No
    3   Other
    4   Not applicable

> ### How?
>
>   4   Changed data collection processes
>   8   Changed program goals
>   10   Changed target participants
>   16   Changed program services (to participants)
>   10   Not used to make changes to the program
>   8   Changed internal program operations
>   5   Other
>   4   Not applicable

What barriers exist to getting environmental outcome data?

    14   Data submission can't be required
    12   Cost of data collection / data analysis
    4   Nature of environmental data / linking outcomes to programs
    8   ICR issues / PRA
    10   Sensitivity of data / proprietary
    13   Getting accurate data
    16   Other
    4   None

I am going to read a list of 4 benefits that voluntary program participants can receive. We took this list from OPEI's guidelines for designing voluntary programs. Please tell me whether your program provides any of the following program benefits:

	Yes	No	No answer
Environmentally Preferable Product Designation	16	38	0
EPA/State Partnership opportunity	46	8	0
Public Recognition	46	7	1
Regulatory Flexibility	10	44	0

We identified a few additional program benefits that participants can receive, not covered by OPEI's guidelines. Please indicate whether this voluntary program offers the following three benefits:

	Yes	No	Don't Know
Technical Assistance	52	2	0
Information	52	2	0
Competitive Business Solutions, defined as helping companies realize greater profits while achieving environmental results	39	15	0

Does this program provide any other benefits to participants?
    What are these? *(describe)*
    5   Grants
    15   Networking
    3   Increased public awareness of problem.
    3   Intended program activity outcomes
    19   Other
    19   Not applicable
	35	18	1

I am going to read a list of six categories and ask you to indicate whether the participants in this program fall into any of the categories:

		Yes	No	No answer
Would you say they are:	Industry or Business	48	6	0
Would you say they are:	Non-profit	41	13	0
Would you say they are:	State/Local Government	44	10	0
Would you say they are:	Individuals	20	34	0
Would you say they are:	Schools or Universities	36	18	0
Would you say they are:	Anything else	29	24	1
Who?		↵		
	17 Other Federal agencies 5 Tribes 4 Trade Associations 4 International community 1 NGOs 2 Other EPA offices or regions 9 Other 25 Not applicable			

How is this program marketed to potential participants?

35	Website
40	Conferences: presentations, trainings, networking
19	Use partners to market or recruit
25	Advertising: print, radio, TV, brochures, literature, publications
6	Formal avenues: RFP, Federal Register, etc.
20	Direct / targeted outreach (including mailings and list-serves)
17	Word of mouth
9	Other

Do you set program participation goals?

30	Yes
22	No → Why not?
1	Other
1	Not applicable

       Why not?

7	Outcome focused program (outcome goal is not participation)
4	Program is full / at capacity with participants
4	EPA is not the sole actor in determining participation goals.
5	Participation is lower priority than other program management activities
3	Other
32	Not applicable

What type of commitment is required of participants?

21	Data
8	Self-defined plan / program
26	In line with program goals: reduction / outcome specific commitments
14	Mention of formal MOU-type agreement
3	Market / promote the program
9	Other
3	Not applicable
7	None

Participant results could potentially be counted twice if a participant is in more than one EPA voluntary program. Do you track if your program participants are in other voluntary programs?

22	Yes
24	No
2	Other
6	Not applicable

How do you determine if participant results are a product of your program and not the other(s)?

7	We don't know
27	No overlap with any other program
2	We have a process to do so - other/none
11	We have a process to do so - coordination
7	We have a process to do so - outcome attribution model
7	Other
6	Not applicable

How many FTEs are assigned to this program?

Total FTEs	364.70	0 n < 1 FTEs	12
Mean	6.75	1 n ≤ 2	13
Median	2.65	2 n ≤ 5	14
		>5 FTEs	15

This voluntary program may coordinate with other offices, programs or agencies. I'm going to read a list of possible opportunities for coordination, and please indicate for each one if you do coordinate with them, if you could coordinate with them but don't at this time, or if you don't coordinate with them at all.

	Do	Could but don't	Don't	Other	Don't know
Other EPA voluntary programs?	42				1
Other EPA regulatory programs?	30	1	23	0	0
Other Federal agencies?	44	5	3	2	0
Regions?	45	2	7	0	0
States?	44				0
Local agencies?	36	1	17	0	0

What is your annual budget in dollars?

$ 351,529,000	Total
$ 6,509,796	Mean
$ 492,500	Median

Does this funding come solely from your office?

40	Yes
11	No
3	Other

Have you performed a cost-benefit analysis of this voluntary program?

   24   Yes
   27   No
    2   Other
    1   Not applicable

Glossary of Terms

Basic Program Budget

The level of funds appropriated or allocated to a program for operation and implementation.

Competitive Business Solutions

This is a partnership program benefit that helps participating companies realize greater profits while achieving environmental results.

Environmentally Preferable Product Designation

This is a partnership program benefit. As defined in Section 201 of Executive Order 13101, this designation means products or services that "have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose."

EPA/State Partnership Opportunities

This is a partnership program benefit that provides the opportunity for a regulated or non-regulated entity to work as a cooperative partner with the EPA or a State to solve an environmental problem.

Fees Paid by Participants

Those fees paid by partnership program participants.

Formal Commitment Requirements

Partnership programs with formal commitment requirements may require participants to sign a memorandum of understanding, and may even remove participants from the partnership program if they fail to meet their agreed upon commitments.

Informal Commitment Requirements

Partnership programs with informal commitment requirements may ask participants to submit data, participate in regular meetings, or meet environmental goals in non-specific or non-binding ways.

Information

This is a partnership program benefit, and includes the various publications, newsletters, and website content provided by a partnership programs to make potential participants aware of the environmental problem the program targets, target audience, program benefits provided, and program participation requirements.

In-kind Contributions

This is a contribution of equipment, supplies, or other property in lieu of a dollar contribution. Some organizations may also donate space or staff time as an in-kind contribution.

Networking

This is a partnership program benefit that helps program participants establish a relationship with other partnership program participants, EPA or State agency staff, or other like-minded businesses or individuals who are willing to share best practices for the mutual benefit of all those participating.

No Commitment Requirements

Partnership programs with no commitment requirements may simply ask participants to achieve environmental outcomes in good faith, or may not formally enroll participants at all.

Partnership Program

For the purpose of this evaluation, partnership programs are defined as, "A program currently operated by a Headquarters program office that is national in scope, and that works to encourage participants to voluntarily engage in environmentally beneficial activities."

Program Benefits Provided to Participants

These are the various services and benefits provided to partnership program participants. These include the various partnership program benefits defined in this glossary, as well as many more unique benefits that have been developed and tailored for partnership program participants.

Program Partners

Those organizations, individual citizens, or partnership program participants who take an active role in helping to implement partnership programs by sharing program tasks, and in some cases, by undertaking program management roles. These partners are sometimes

included in the overall program participant count because they are described as an integral part of the program, though they are not the primary target participant.

Public Recognition

This is a partnership program benefit that is provided to a program participant to publicly recognize them for their efforts in a partnership program.

Regulatory Flexibility

This is a partnership program benefit that is provided to participants of some partnership programs. This benefit allows for the development, review, and approval of an alternative regulatory environmental standard that is at least as protective of human health and the environment as the existing standard.

Technical Assistance

This is a partnership program benefit that provides best practices, technical recommendations, and assistance in meeting regulatory requirements, exceeding regulatory requirements, or in implementing activities that reduce the impacts of environmental issues not covered by regulations.

Unique Program Benefits

These are types of partnership program benefits that do not fit into any specific category, and which are unique to the program that offers them. The programs we interviewed provided 19 different examples of these types of benefits, including such things as: "improved quality of life;" "improved corporate environmental image;" and, "helping individuals become engaged as stewards of their watershed."

Agency Responses to the Draft Report

Comments from the Office of Policy, Economics, and Innovation

October 12, 2006

MEMORANDUM

Subject: NCEI Comment on Draft Evaluation Report
            Diverse Partnership Programs May Expand EPA's Environmental Influence
            Assignment Number: 2006-0093

From: Jay Benforado, Director National Center for Environmental Innovation

To: Jeffrey Harris, Director for Program Evaluation, Cross-Media Issues

We appreciate the opportunity to comment on the Draft report- *EPA's Partnership Programs May Expand Its Influence*. Overall we feel that the content of the report provides a good understanding of the Agency's Partnership Programs, and we look forward to using the information to help us in our efforts to coordinate the Agency's Partnership Programs.

Comments on Next Steps

At a broad level, we endorse further evaluation as outlined in "next steps," but would appreciate your consideration of the following:

1. **EPA Partnership Program Strategic Management/Coordination Work Completed and Under Way.** As you assess the existing capacity for conducting performance measurement (or the extent to which programs actually measure performance), the analysis should also look at the work that is under way to enhance that capacity over time. This includes the recently released *Guidelines for Measuring the Performance of EPA Partnership Programs* which can be found on the EPA intranet at www.intranet.epa.gov/partners, and the training courses, *Fundamentals of EPA Partnership Program Design Training* and *Social Marketing Training* that have been well received. It is important to recognize that the snapshot at a particular moment may not be an accurate picture of the longer term situation.

   > See OIG Comments in Appendix E, Note 1

2. **The important indirect impacts of EPA Partnership Programs.** The report focuses heavily on measures of performance, and the cost of implementation. We think both of these are important to evaluate. However, it is critical to recognize that the effects of partnership programs are complex and sometimes indirect.   It is therefore important

   > See OIG Comments in Appendix E, Note 2

not to look too narrowly at easily quantifiable benefits, or at benefits that are the immediate result of program participation.   To use just one example, the Performance Track program reports "results" based on what its members report in terms of reduced pollution or resource use. The long run value of the program to EPA, however, may lie in less tangible benefits. For example, by highlighting and publicizing the achievements of leaders, the program may influence the behavior of laggards (who can no longer claim that they are doing everything possible when pressed by communities or stockholders). Furthermore, by joining Performance Track the firm is making a public commitment that would be more difficult to back away from in later years than would be the case in the absence of the program. Lastly, many experts believe that capacity-building is an essential pre-requisite for companies and other organizations to move "beyond compliance". Performance Track plays a major role in organizational capacity building. It is highly important to recognize that the mechanisms by which programs have their effect vary greatly; again, this makes it important to fully appreciate the complexity of assessing the "results" of those programs.

General Concerns with Draft Report

The inclusion of the grant-based National Non-point Source Management Program skews data and analysis. Of all the programs you analyze in your evaluation, this is the only one to our knowledge that is primarily a grants-based program. By grants-based we mean that most of the work and resources of the program is devoted to managing grants to other organizations. We believe that grants based programs should not be included in this analysis because:

> See OIG Comments in Appendix E, Note 3

a. While the program may involve "partnerships" it does not qualify as one of the "EPA Partnership Programs" as defined by the IAC Partnership Programs Workgroup. The definition used by this IAC Workgroup did not want to include programs for which EPA does not have ultimate authority over (EPA supports but does not fully control or have oversight over programs run by grantee organizations. Therefore they should not be allowed to claim they are "EPA Partnership Programs"). For this reason we do not plan to include it in our EPA Partnership Program Accomplishments Report.

b. Because it is primarily a grants-based program, it represents an inherently different policy approach than all the other EPA Partnership Programs surveyed in the evaluation.

c. If this program must be included, we strongly recommend for the sake of consistency and ensuring the integrity of your analysis, that all grants-based programs involving partnerships be included. This would mean adding dozens if not hundreds of other EPA grant-based programs that involve partnerships.

d. To include only this grants-based program in your evaluation skews the otherwise highly valuable budget analysis in your report substantially, since this program is nearly an order of magnitude larger than most EPA Partnership Programs. Please

> See OIG Comments in Appendix E, Note 4

see the attached list of grants-based stewardship programs that may need to be included to ensure consistency if the National Non-point Source Management Program is included in this report.

We believe the financial incentives used by EPA Partnership Programs need to be mentioned in the report. While we believe grants programs should be excluded from this report, we believe many of the most successful EPA Partnership Programs have found creative and powerful ways to leverage financial incentives and relationships. We are concerned this major incentive used by these programs was not conveyed in the report. The terms "savings," "financial" or "monetary" do not even appear in the report. Had the survey been written a bit differently (e.g., with a focus on the term "incentive" to the target audience instead of the term "benefit"), your research may have found:

a. Many EPA Partnership Programs have successfully leveraged the incentive of cost savings (AgStar, Combined Heat and Power, Energy Star Product Labeling, Energy Star Homes, GreenScapes, Labs 21, SmartWay Transport, WasteWise and many others).

> See OIG Comments in Appendix E, Note 5

b. Some programs achieved substantial environmental results by convincing the federal government and other major buyers to "spec" certain products or services, yielding a significant financial incentive (Energy Star Office Equipment family of programs, many EPA Partnership Programs linked to the USGBC LEED green building standards set by many local and regional governments).

c. Some EPA Partnership Programs are leveraging financial value of selling a waste product as an input to another company (Methane to Markets, WasteWise).

d. At least one EPA Partnership Programs is leveraging the financial incentive Wall Street investors and analysts have on the firms they select and recommend firms that own and operate "high performance buildings" that demonstrably yield higher worker productivity (Energy Star Buildings/Commercial and Industrial).

e. Some EPA Partnership Programs are leveraging the incentive by shareholders and company executives have to avoid financial risk (Climate Leaders, Hospitals for a Healthy Environment).

f. At least one EPA Partnership Program is leveraging the financial influence that major manufacturers have on their supplier networks (Green Suppliers Network).

Line Edits
Some specific comments on the text are provided below:

1. **Title Page:** The title language is a little confusing the way it currently reads it is not clear whose influence is being expanded.

> See OIG Comments in Appendix E, Note 6

2. **At a Glance, First Sentence:** "Partnership Programs **may** expand EPA's…." should be changed to "Partnership Programs **have** expand EPA's…". There is evidence that these programs have allowed us to

> See OIG Comments in Appendix E, Note 7

make environmental improvements in areas where we do not have statutory authority or where a regulation would be impractical.

3. **At a Glance, Middle of the Second Paragraph:** "Partnership Programs build on the Agency's traditional regulatory efforts, but are not intended as alternatives to regulatory services." We suggest changing this sentence to read "Partnership Programs….efforts, but are not intended as substitutes for regulations."

See OIG Comments in Appendix E, Note 8

4. **Page 2**: It is unclear from the definition listed how grant programs fit into the scope of this evaluation. The Partnership Programs Team does not include grants programs in our analysis.

See OIG Comments in Appendix E, Note 9

5. **Page 3**: Radon is listed as the oldest partnership program, this is a program that we have not historically included in our analysis, we question whether it truly belongs on this list.

See OIG Comments in Appendix E, Note 10

6. **Page 4**: We would also suggest adding the fact that the ten largest programs account for the majority of Agency investment in Partnership Programs. Our data shows 7 programs account for two-thirds of the spending on national partnership programs.

See OIG Comments in Appendix E, Note 11

7. **Page 6, Second Sentence**: There appears to be some language confusion, "Program Managers said (assert?) their programs…". Should this not read "Program Managers said their programs…"

See OIG Comments in Appendix E, Note 12

Thank you for considering these comments and we look forward to an on-going collaboration.

Comments from the Office of Solid Waste and Emergency Response

October 20, 2006

MEMORANDUM

SUBJECT: OSWER Response to OIG Draft Evaluation Report "Divers Partnership Programs
May Expand EPA's Environmental Influence"

FROM: Susan Parker Bodine
Assistant Administrator

TO: Bill A. Roderick
Acting Inspector General
Office of Inspector General

Thank you for the opportunity to comment on the subject draft evaluation report. We offer the following comment: On page 7, you mention niche issues, "including diverting electronic waste from landfills". Please note, that the focus of Plug-in to eCycling is to conserve resources, not divert wastes.

| See OIG Comments in Appendix E, Note 13 |

If you have any questions, please contact Thea McManus at (703) 308-8738.

OIG's Comments on Agency's Response

1. As we continue to evaluate EPA's partnership programs, we will review all appropriate Agency guidance and policy documents.

2. We agree that there are many possible outcomes that EPA can achieve through implementing partnership programs. While some of those outcomes may be indirect, we believe that it is important to assess and evaluate quantifiable partnership program outcomes as they are able to be identified.

3. As noted in the Scope and Methodology section on Page 2,

   "EPA's definition of partnership programs has continued to evolve during our review. For the purpose of this evaluation, we define a partnership program as 'A program currently operated by a Headquarters program office that is national in scope, and that works to encourage participants to voluntarily engage in environmentally beneficial activities.' In consultation with the OIG, each EPA program office provided us with a list of partnership programs that met our criteria."

   The Office of Water's partnership program list included the National Non-Point Source Program, so it was included in our census population.

4. In their comments, OPEI expressed concern that including the National Non-Point Source Program "skews the otherwise highly valuable budget analysis in your report substantially, since this program is nearly an order of magnitude larger than most EPA Partnership Programs." However, if we were to remove the program from our financial analysis, there would still 36 programs with budgets of $1 million or less, two programs that still report no budget at all, and the median program budget with this program removed would be $485,000, a difference of only $7,500.

5. Because the scope of our survey did not include collaboration - in particular financial collaboration - with external partners, we did not collect the necessary information to discuss such incentives in this report. However, we agree that this is an important partnership program issue, and we plan to address it in future work.

6. We have changed the title of the report to, "Partnership Programs May Expand EPA's Influence."

7. Because we did not independently verify the survey responses for accuracy (including program outcomes), we cannot validate the results that each program claimed in their survey responses.

8.   We have made this change to the At a Glance section.

9.   As noted in Comment 3, each program office compiled their list of partnership programs. While we recognize that OPEI considers the Non-Point Source Program to be a grant program, it was included in the Office of Water's partnership program list based on our criteria and was therefore included in our census population.

10.   As noted in Comment 3, each program office compiled their list of partnership programs. The Office of Air and Radiation's partnership program list included the Radon program, so it was included in our census population.

11.   We agree that a small number of programs receive the majority of partnership program spending. However, the results of our survey do not support this specific assertion.

12.   We have made this change to Chapter 2.

13.   We have changed this sentence to read as follows: "These programs address a range of niche environmental issues, including diverting electronic waste from landfills, or helping magnesium manufacturers reduce greenhouse gas emissions." This is based on the program's verified response to the survey question, "What environmental problem does the program address?" as follows:

      - Resource Conservation and Land Preservation.
      - ***Divert waste from landfills, including heavy metals***. Reduce potential for releases and exposures to hazardous substances.
      - Use resources more efficiently through increased reuse and refurbishing of reusable products. Increase recovery of materials and reuse of them in new products.

      We recognize that the program may address several environmental problems, and determined that this particular portion of the response was a niche issue.

Distribution

Office of the Administrator
Assistant Administrator, Office of Air and Radiation
Assistant Administrator, Office of Administration and Resources Management
Associate Administrator, Office of Policy, Economics and Innovation
Assistant Administrator, Office of Office of Prevention, Pesticides, and Toxic Substances
Assistant Administrator, Office of Research and Development
Assistant Administrator, Office of Solid Waste and Emergency Response
Assistant Administrator, Office of Water
Audit Follow-up Coordinator, Office of Air and Radiation
Audit Follow-up Coordinator, Office of Administration and Resources Management
Audit Follow-up Coordinator, Office of Prevention, Pesticides, and Toxic Substances
Audit Follow-up Coordinator, Office of Research and Development
Audit Follow-up Coordinator, Office of Solid Waste and Emergency Response
Audit Follow-up Coordinator, Office of Water
Agency Follow-up Official (the CFO)
Agency Follow-up Coordinator
Associate Administrator for Congressional and Intergovernmental Relations
Associate Administrator for Public Affairs
Office of General Counsel
Acting Inspector General