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Guidance on using the SIRG measures template and meeting OMB's requirement

Background – what is the OMB requirement?

The Federal Office of Management and Budget (OMB) is continuing its efforts to have Federal agency grant programs demonstrate results, and align grant programs with agencies' strategic goals. OMB also wants to ensure that the results obtained from State grants are reported in a consistent, meaningful way across all of the states.

To address this issue, OMB is requiring EPA to develop a standardized template that all States will use to develop and submit their State grant agreements. This new template is to include clear linkages to EPA's Strategic Plan and long-term and annual goals, as well as consistent requirements for regular performance reporting.

How does the OMB requirement apply to the SIRG program?

The SIRG program was one of many grants selected to be included in this requirement for the FY07 budget year. To meet this requirement, EPA's radon program has developed a set of four measures which have been included in the EPA's overall template. These measures include:

- The number of homes mitigated each year
- The number of homes built with radon resistant new construction (RRNC)
- The number of schools mitigated or built with radon resistant new construction
- States report the performance measures they use that have clear linkages to those of EPA (homes mitigated, new radon resistant homes, schools mitigated or built radon resistant). For example, many states will be able to report on the number of tests conducted to detect high levels of radon in homes.

EPA's radon program has also developed its own measures template to provide more detail and assistance to help State radon programs meet the OMB requirement. The radon program template is designed to provide specific examples of the types of measures and activities which states can report to meet the OMB requirement.

How were the measures determined, and what do they mean?

EPA's 2012 goal for OMB's Program Assessment Rating Tool (PART) and for the 2008-2011 Strategic plan is to prevent 1250 future premature lung cancer deaths. The three primary measures chosen for inclusion in EPA's template: homes mitigated, homes built with RRNC, and schools mitigated or built with RRNC all directly contribute to EPA's long term strategic goal for the radon program – preventing radon induced lung cancer deaths.

The fourth measure is designed to allow states the flexibility to report outcomes from all of the types of activities they conduct through the SIRG program. Since states are allowed flexibility under the SIRG program, a large number of states will report a

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measure/ measures under this category. Any measure used should directly support one of the other three measures. The state should be able to succinctly describe how its measure supports one or more of the other three EPA measures. (For example, testing homes and/or schools is a necessary step to determine if mitigation is needed.)

EPA's radon template includes a visual graphic of the hierarchy of measures which states may use to meet the OMB requirement. At the top of the hierarchy is EPA's long term strategic goal of preventing future cancer deaths. Next down are the first three measures outlined above - actions which will directly lead to reduced exposure to radon, and therefore to the prevention of future cancer deaths. The third level down includes intermediate outcome measures which directly support one or more of the three primary measures. The lowest level on the hierarchy represents general support mechanisms, such as building coalitions and partnerships, and implementing radon awareness activities – all of which can provide a foundation for increasing radon action. EPA encourages states to report on measures as far up the hierarchy as makes sense for their particular programs.

How should a state select the measures it will use?

The measures a state uses should accurately reflect all of the work the state is doing through its SIRG grant. When filling out the template checklist, states should check all areas in which it is working, and to the extent possible identify at least one measure under each work area. If a state has not identified a measure for a particular work area, the state should indicate that no measure has been identified, and work with their regional EPA office to identify a measure in a timeframe agreeable to the State and EPA.

All states should have at least one measure. Smaller programs may have only one measure, while states with larger, more robust programs, will need more than one measure to capture their full range of work.

The template is written to cover the wide range of State radon programs. EPA recognizes that there is significant variability in the type of work that states conduct, and therefore this variability will be reflected in the measures used to report progress. Reasons for this variability include, but are not limited to:

- The level of the radon risk in the state
- The size of the SIRG grant
- Whether the state conducts a voluntary program or regulates the activities of service providers
- Political or other characteristics of the state

The template should not be interpreted as a directive from EPA to refocus the work of the state program to each of the priority areas. For example, a few states focus efforts on testing and mitigation of schools. The inclusion of schools in the template is intended to allow the states doing that work to capture it. EPA is not asking other states to increase their focus on schools at this time.

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What is the relationship of the measures template to the annual workplan?

The radon measures template is not intended to replace the annual workplan the state submits to EPA. The measures template should instead supplement the workplan. The template is intended to help regions and states clarify and highlight the outcomes that are required in the workplan, and should help provide a consistent reporting system so that EPA is collecting the same types of information from each state.

When should a state fill out the template checklist?

States should submit the completed the template checklist with its submission of its annual workplan.*

How and when should progress be reported?

As part of their regular reporting of progress to EPA, states should provide a short written description of their results. This report should include numerical tables and charts where feasible to make the information easy to read, qualitative results, and a short narrative describing how the work of the state leads to these results, and should be submitted in conjunction with the states annual end of year reports. EPA estimates that this section should be 2-3 pages in length.

While the primary requirement from OMB will be for annual reporting on the template, to the extent possible, States should also include measures and results reporting consistent with the template in quarterly reporting. This will assist EPA and the States in keeping track of progress, and in answering periodic questions from OMB.

How many resources/ how much should a state spend on measuring SIRG program results and meeting the template requirements?

States should work closely with their Regional Offices to determine the appropriate levels of spending on measurement. In many cases, states already collect significant data, and may only need to report what they are collecting in the template format. In addition, states with smaller SIRG grants should not be spending as much money on measurement as larger programs. States should first determine if they can use existing resources and spending to meet the requirement, and/or add relatively small additional spending. If this is not possible, this discussion should be part of the workplan negotiation with the region.

What should be collected by the states, and what data should EPA collect?

EPA headquarters is working on improving measures at the national level, and will continue to work with the states to determine/ refine the appropriate roles for EPA and the states. There will clearly be cases where EPA headquarters will collect data and help to determine results at the state level. For example, EPA may be able to work with some

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of the larger testing companies to obtain and analyze data more efficiently than individual states.

In addition, some of the states may already collect certain data, while other states may have more difficulty collecting that data. For example, many states with larger programs have a working relationship with testing laboratories and already collect information on tests conducted. In these cases, states will be able to report this information to EPA with little additional burden. Other states with small programs and limited resources would find collecting this data difficult, and as stated above, this data may be collected more effectively by EPA.

How should states report on direct SIRG results, historical results, and total progress on the radon issue in the state?

To the extent possible, EPA would like to encourage states to focus on two levels of results - 1) those achieved directly by the actions of the state radon program using current SIRG funding and any match provided by the state, and 2) the overall level of radon activity and action in the State.

EPA will work with the states to ensure that proper context is given to all results reported to OMB, including the history of the program in the state and past results. EPA encourages states to include this context in brief form in the results narrative it submits with its annual reporting. EPA will continue to have an open dialogue with states on how to share proper baseline and context information with OMB.

When does this requirement take effect?

This requirement will take effect for all grants using FY07 funding from EPA (***federal funds appropriated to EPA on October 1, 2006, or later***). However, EPA recommends that states begin using the template earlier if feasible. This will allow for EPA and States to work together to make adjustments in the process as needed.

* If a state is using the template earlier than the effective date of the requirement, the template checklist may be submitted to EPA separately from the workplan.