U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

Operating efficiently and effectively
Partnering with states and other stakeholders

Management Controls Needed to Verify and Report Border 2020 Program Accomplishments

Report No. 20-P-0083 **February 18, 2020**

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Abbreviations

EPA	U.S. Environmental Protection Agency
NADB	North American Development Bank
OIG	Office of Inspector General
OITA	Office of International and Tribal Affairs

Cover Photo: Tijuana River National Estuarine Research Reserve. (EPA OIG photo)

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U.S. Environmental Protection Agency
Office of Inspector General

20-P-0083
February 18, 2020

At a Glance

Why We Did This Project

The U.S. Environmental Protection Agency Office of Inspector General conducted this audit to determine whether the Border 2020: U.S.-Mexico Environmental Program (Border 2020 Program) management controls are sufficient to verify that program activities are completed, are linked to the accomplishment of program objectives, and demonstrate progress toward achieving the program's environmental and public health goals and objectives.

The Border 2020 Program is an eight-year binational effort between the United States and Mexico designed to "protect the environment and public health in the U.S.-Mexico Border region." The Border 2020 Program aims to improve environmental conditions in underserved communities and sensitive populations by fulfilling its five goals and associated objectives. The program's objectives and goals are implemented by the environmental authorities of the United States and Mexico.

This report addresses the following:

- *Operating efficiently and effectively.*
- *Partnering with states and other stakeholders.*

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List of OIG reports.

Management Controls Needed to Verify and Report Border 2020 Program Accomplishments

What We Found

Border 2020 Program successes in improving environmental conditions and public health cannot be fully known or documented without stronger management controls.

The EPA's implementation of the Border 2020 Program management controls is not sufficient to verify that the EPA Border 2020 Program activities are completed, are linked to the accomplishment of program objectives, and demonstrate progress toward achieving the program's environmental and public health goals and objectives. Although a varied set of documents has been developed to share the contributions of individual projects to Border 2020 Program goals and objectives, we found that essential documentation on Border 2020 Program activities was frequently unreliable.

According to the EPA, Border 2020 Program reports should provide information on the status and trends of environmental quality in the U.S.-Mexico border region using the EPA-determined output-based indicators. However, we found that the most recent indicator report was developed in 2016 and was only published as an interim report. The Border 2020 Program is not planning to create any additional reports on environmental quality at the border because it lacks sufficient resources.

The EPA's Strategic Plan and the Border 2020 Program Communications Strategy emphasize sharing information about Border 2020 Program-funded products, such as reports, studies, videos, and other tools, or environmental outcomes with its external stakeholders and the public. Sharing these products help track the program's actions and accomplishments. We found that the EPA has not shared many of these products and results from program-funded projects; thus, the status of the Border 2020 Program's activities is neither transparent nor accessible.

Without sufficient management controls for the Border 2020 Program, the EPA cannot verify whether the program is achieving its intended purpose to protect the human health and environment as it relates to the U.S.-Mexico border.

Recommendations and Planned Agency Corrective Actions

We recommend that the EPA establish and implement management controls to (1) increase the reliability of action plans by standardizing the format and to determine how and when Policy Forums action plans will be developed; (2) develop performance measures; (3) share subgrantee fact sheets; and (4) provide stakeholder and public access to funded products such as studies, reports, and videos. The Agency agreed with our recommendations and provided acceptable corrective actions.

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

THE INSPECTOR GENERAL

February 18, 2020

MEMORANDUM

SUBJECT: Management Controls Needed to Verify and Report Border 2020 Program Accomplishments
Report No. 20-P-0083

FROM: Sean W. O'Donnell

TO: W.C. McIntosh, Assistant Administrator
Office of International and Tribal Affairs

This is our report on the subject audit conducted by the Office of Inspector General of the U.S. Environmental Protection Agency. The project number for this audit is OA&E-FY19-0245. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position.

The Office of International and Tribal Affairs is responsible for the findings outlined in this report.

In accordance with EPA Manual 2750, your office provided acceptable corrective actions and milestone dates in response to OIG recommendations. All recommendations are resolved and no final response to this report is required. However, if you submit a response, it will be posted on the OIG's website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public. If your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epa.gov/oig.

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Purpose

The Office of Inspector General conducted this audit to determine whether the U.S. Environmental Protection Agency's management controls for the Border 2020: U.S.-Mexico Environmental Program (Border 2020 Program) are sufficient to verify that program activities are completed, are linked to the accomplishment of program objectives, and demonstrate progress toward achieving the program's environmental and public health goals and objectives.

Background

The Border 2020 Program is an eight-year binational plan executed on August 8, 2012, between the United States and Mexico to "protect the environment and public health in the U.S.-Mexico Border region." The Border 2020 Program aims to improve environmental conditions in underserved communities and sensitive populations by fulfilling five goals and associated objectives. The Border 2020 Program also "aims to provide stakeholders timely access to environmental data and promote training and capacity building that focuses on environmental and programmatic sustainability within border communities." In 1983, the United States and Mexico signed the La Paz Agreement to facilitate cooperation in addressing environmental problems along the U.S.-Mexico border. Implementation of the La Paz Agreement and its priorities has largely been carried out through the Border 2020 Program and its three prior iterations.[1]

Cacti in Tijuana Estuary, a Border 2020 project site. (EPA OIG photo)

Border 2020 Program Goals and Objectives

The Border 2020 Program has a specific set of goals and objectives to protect the environment and public health in the U.S.-Mexico border region.[2] They are:

1. Reduce air pollution.
2. Improve access to clean and safe water.

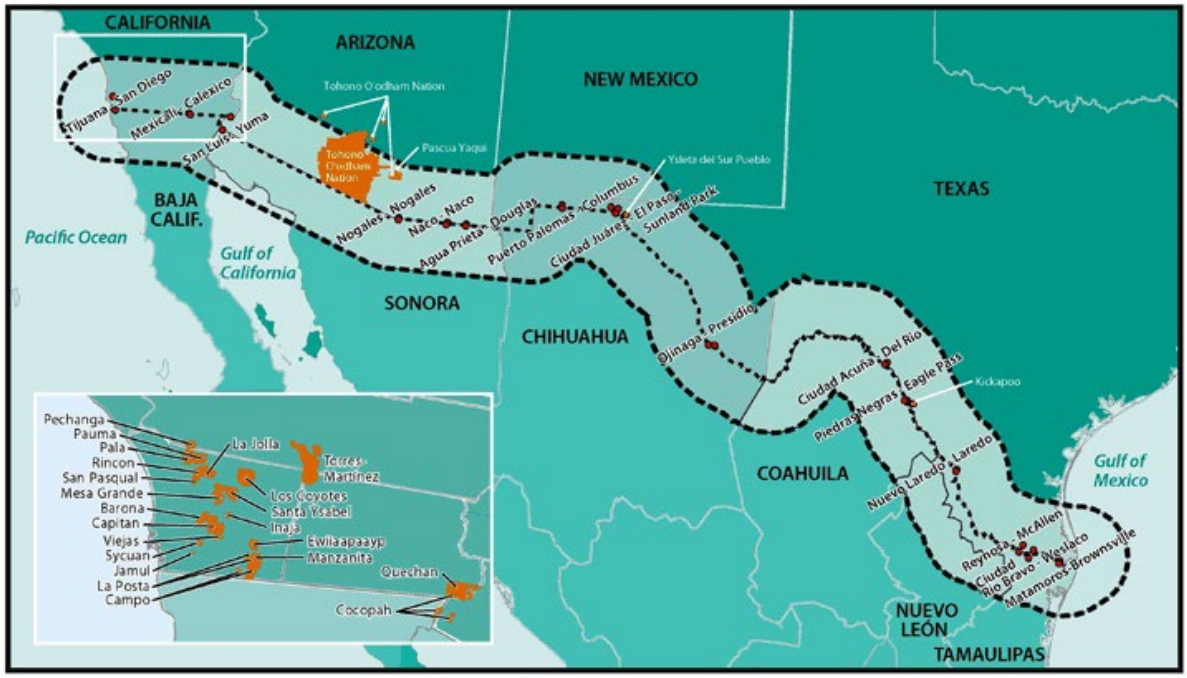
[1] The first binational program was the Integrated Border Environmental Plan for the U.S.-Mexico border area established between the environmental authorities of the United States and Mexico. The next iteration of the program was the Border XXI program, a five-year bilateral effort by the EPA and the Mexican Environment, Natural Resources Fisheries Secretariat, and the Mexican Social Development Secretariat. The Border 2012 Program was established in 2003 through negotiations and participation of the ten border states, 26 U.S. tribal nations, the EPA, the Mexican Secretariat of Environment and Natural Resources, the U.S. Department of Health and Human Services, and the Mexican Secretariat for Health. The Border 2012 Program was designed as a ten-year program and emphasized a regional bottom-up approach, which incorporated local decision-making, priority setting, and project implementation as the basis for addressing environmental issues in the border region.

[2] Each Border 2020 Program goal has four to five objectives. See the EPA Border 2020 Program website for a complete list.

3. Promote materials management and waste management, and clean sites.
4. Enhance joint preparedness for environmental response.
5. Enhance compliance assurance and environmental stewardship.

These goals and objectives were developed based on input from stakeholders and program partners, as well as existing environmental challenges that remain along the border. Figure 1 depicts the U.S.-Mexico border region, which extends approximately 2,000 miles from the Gulf of Mexico to the Pacific Ocean and includes over 60 miles on each side of the border, impacting four states in the United States and six states in Mexico.

Figure 1: Map of U.S.-Mexico Border Region



Source: The EPA.

Border 2020 Program Roles and Responsibilities

Numerous national, regional, and local stakeholders contribute to the design, planning, and implementation of the Border 2020 Program. As depicted in Figure 2, the United States and Mexico are represented by the Office of International and Tribal Affairs and the Mexican Secretariat of Environment and Natural Resources, respectively.[3] OITA is further supported by EPA Regions 6 and 9. The Border 2020 Program within the EPA also maintains specific staff in two EPA border offices located within Regions 6 and 9 in El Paso, Texas, and

[3] OITA is responsible for the budget of the Border 2020 Program and grant funding. According to the EPA, in fiscal year 2019, $504,000 out of the $2,696,000 that was budgeted for the Border 2020 Program went toward Border 2020 project grants.

San Diego, California, respectively.[4] The border offices are responsible for outreach in the community, and they are the technical leads for each of the Border 2020 Program goals. Each country is represented on workgroups, task forces, and five Policy Forums that address specialized policy issues.

Figure 2: Border 2020 Program roles and responsibilities

Source: The EPA OIG.

North American Development Bank

The Border 2020 Program initiates projects primarily by issuing grants. The grants that are funded by OITA are conducted through a single grantee that then provides the money to individual projects, which are referred to as subgrantees.

[4] In fiscal year 2019, the border office in Region 6 had 4.9 full-time equivalents (including one border office director) and the Region 9 border office had 3.7 full-time equivalents (including one border office director) who worked with their Mexican counterparts in regional workgroups. For Region 6, the workgroups included the Texas-New Mexico-Chihuahua workgroup and the Texas-Tamaulipas-Nuevo Leon-Coahuila workgroup. For Region 9, the workgroups included the Arizona-Sonora workgroup and the California-Baja California workgroup.

The North American Development Bank is the sole EPA grantee for the Border 2020 Program. To facilitate the relationship, the EPA has cooperative agreements with the NADB to manage funds and facilitate projects associated with the Border 2020 Program.[5] The NADB maintains all the subgrantee records, which include, but are not limited to, fact sheets, work plans, quality assurance project plans, and technical assistance agreements associated with the projects. The NADB uses a file sharing service to give the EPA access to all the subgrantee records.

Border 2020 Program Project Process

After the cooperative agreements between the EPA and the NADB are complete, the project planning process begins for the Border 2020 Program. The regions, the NADB, and border offices lead the effort to develop gap analyses to determine where the Border 2020 Program objectives are not being met and where more projects are needed. As depicted in Figure 3, the gap analyses are used to support the development of the requests for proposal for Border 2020 Program projects. The regions, border offices, and the NADB work together to develop requests for proposal that meet Border 2020 Program project needs. According to the EPA, the NADB, with consensus from EPA staff, selects the Border 2020 Program subgrantee projects.

Figure 3: Border 2020 Program planning process

Source: The EPA OIG.

Work plans are developed for each project once they are selected, as a part of the NADB's oversight. The work plans outline the activities, priorities, and criteria that will be completed and used during the duration of the project. The NADB,

[5] Cooperative agreements are documents that outline the project title and description, project period and budget, and administrative and programmatic conditions. The NADB is responsible for dispersing the funds and oversight of the subgrantee. The EPA participates in the selection of subgrantees; however, the NADB has the final decision on which projects receive funding based on the criteria set forth by the Border 2020 Program.

the EPA, and the subgrantee must agree on the work plan. The work plans are completed in the beginning of the grant cycle, and they are used by the Border 2020 Program staff and the NADB throughout the project life cycle to determine whether the projects are on track. The projects are also added to the regional action plans, which are overall Border 2020 Program planning and tracking documents developed by the regions, border offices, and regional workgroups with input from the Policy Forums.

Action Plans

Border 2020 Program action plans serve as management controls to outline priorities and implementation strategies to accomplish the various goals and objectives based on available resources, emerging issues, and regional and community priorities.[6] The action plans are designed to align with Border 2020 Program goals and objectives and summarize the accomplishments of the previous two years. According to the Border 2020 Program, action plans should provide concrete activities, time frames, outputs, and outcomes that support and measure progress towards achieving the program's goals and objectives.

Action plans are developed by the border offices, Region 6, Region 9, and the Policy Forums in conjunction with the regional workgroups. These action plans are shared on the EPA's Border 2020 Program website, and serve as a resource to evaluate program effectiveness and identify priority projects and efforts.

Border 2020 Program Communication Strategy

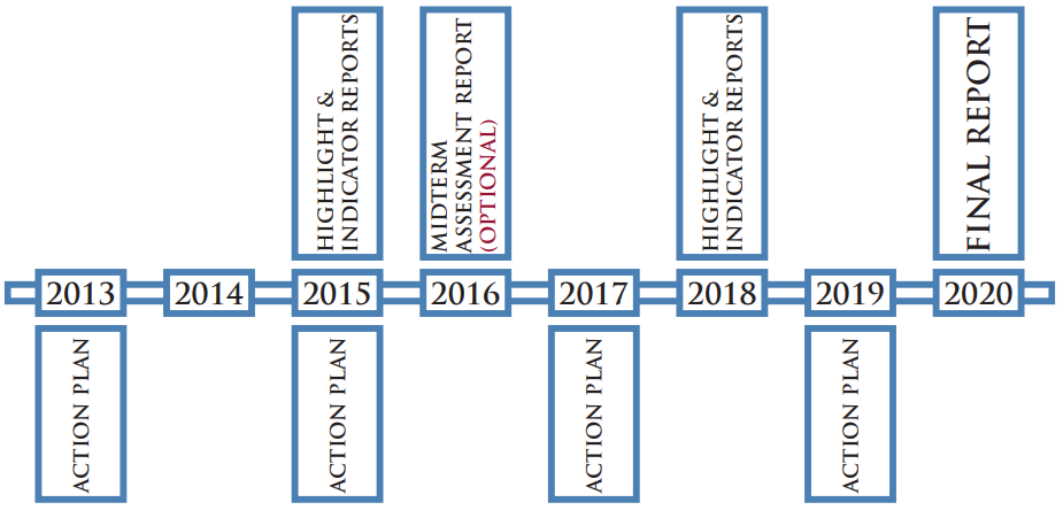
The Border 2020 Program implemented the *Communication Strategy for Border 2020,* dated February 2013, to inform stakeholders and the public of its activities that serve the border region. The strategy states:

> Effective communication is critical to the success of the U.S. - Mexico Environmental Program: Border 2020, a program in which border stakeholders, and federal, state and local governments collaborate to identify and discuss environmental and public health protection in the border region. Therefore, through this Communication Strategy Border 2020 will emphasize the importance of communication so that border stakeholders are well informed, engaged, and committed to Border program activities.

[6] Written processes, policies, and procedures—which are collectively called *internal management controls*—are how federal agencies demonstrate that they implement laws and regulations consistently and effectively. OMB Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, requires federal agencies to develop internal control systems, document the internal control processes of the organization, and engage in ongoing monitoring and evaluations to identify internal control issues. All federal agencies and offices are expected, under the requirements of the circular, to create written policies and procedures to demonstrate that their programs are implemented consistently, effectively, and efficiently.

The EPA's website for the Border 2020 Program contains several types of publications that provide information on progress toward goals and detail specific project accomplishments. Highlights Reports, newsletters, and indicator reports are all mechanisms that are used to share information with stakeholders. The Border 2020 Program developed the following timeline (Figure 4) to depict when each item is scheduled to be shared with the public.

Figure 4: Border 2020 Program accountability and reporting*



Source: Border 2020 Program.

*Newsletters are not included but are required twice a year, according to the Border 2020 Program Communication Strategy.

Scope and Methodology

We performed our work from July to December 2019. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

This audit assesses whether the performance of the Border 2020 Program management controls is sufficient to verify that program activities are completed, are linked to the accomplishment of program objectives, and demonstrate progress toward achieving the program's environmental and public health goals and objectives. We conducted meetings with program staff, regional staff, the NADB, and select subgrantees.

In addition to applicable Border 2020 Program policies and procedures, we reviewed:

- Relevant EPA policies and procedures.
- The Fiscal Year 2018-2021 Strategic Plan.
- Region 6 and Region 9 action plans from 2013 through 2018.
- NADB project work plans and fact sheets from 2013 through 2017.
- 2013 Policy Forums action plans.
- Border 2020 Program Summary.
- Border 2020 Program Communication Strategy.
- Region 6 and Region 9 gap analyses.
- Highlights Reports from 2016 through 2018.
- 2016 Interim Indicator Report.
- Regional newsletters from 2013 through 2018.
- Program budget and full-time equivalent analysis from 2013 through the present.

In addition, we obtained and analyzed grant records, including internal work plans and final fact sheets, for a judgmental sample of 29 Border 2020 Program projects that were completed between 2013 to 2019. We conducted two site visits—one each in Region 6 and Region 9—where we visited completed Border 2020 Program projects. We also attended the San Diego–Tijuana Air Quality Task Force meeting in September 2019.

Prior Report

OIG Report No. 08-P-0245, *Border 2012 Program Needs to Improve Program Management to Ensure Results*, was issued on September 3, 2008. The OIG examined the impact of the Border 2012 Program's management and organization on its ability to meet the program's mission. The report found that the Border 2012 Program lacked a systematic roadmap that defined the relationships between resources, activities, and intended outcomes, and that performance measures focused on outputs rather than outcomes. The OIG recommended that the Agency develop a strategic plan, issue guidance to better support program results, improve performance measures, and develop criteria for determining what constitutes successful completion of program goals. The Agency concurred with all recommendations, and all corrective actions have been completed.

Responsible Office

OITA is responsible for the issues discussed in this report.

Results

The EPA's implementation of Border 2020 Program management controls is not sufficient to verify that the program's activities are completed, are linked to the accomplishment of program objectives, and demonstrate progress toward achieving the program's environmental and public health goals and objectives. Although a varied set of documents has been developed to share the contributions of individual projects to Border 2020 Program goals and objectives, we found that essential documentation on the program's activities was frequently unreliable. Moreover, we found that, contrary to the EPA's Strategic Plan and the Border 2020 Program Communication Strategy, the EPA has not shared many Border 2020 Program funded products externally, such as studies and reports, that would help its stakeholders and the public track the program's actions and accomplishments. Thus, the status of Border 2020 Program activities is neither fully transparent nor accessible to the public.

Action Plan Information Is Unreliable

According to the EPA, the Border 2020 Program action plans are designed to describe and document program accomplishments and indicate progress toward goals and objectives. The Border 2020 Program requires action plans for the four regional workgroups identified in Table 1 below, plus action plans for the Policy Forums, which address multiregional environmental issues such as water and air pollution. However, we found that action plans are not consistently developed. Specifically, when we reviewed actions plans from 2013 through 2018, we found that action plans frequently differed in format, had incomplete information, and did not provide updated information.

Table 1: Regional action plan inconsistencies

Action plans	Failure to identify goals, objectives, or subobjectives	Missing grant information	Action plan not finalized	Unclear project status
Texas-Coahuila-Tamaulipas- Nueva Laredo (Region 6)	X	X	X	X
Texas-New Mexico-Chihuahua (Region 6)	X	X		X
Sonora- Arizona (Region 9)		X		X[a]
California- Baja California (Region 9)		X		X[a]
Policy Forums[b]	X	X	X	X

Source: EPA OIG analysis of Border 2020 Program action plans.

[a] Region 9 has developed an action plan summary document that provides the status (initial, moderate, significant, and completed) of 2017–2018 Region 9 action plan projects. This was an internal document specific to Region 9 that is not shared externally. Region 6 and the Policy Forums did not have a similar summary document.

[b] Summary of results from the available Policy Forums action plans.

We found multiple inconsistencies between action plans, such as a failure to identify goals, objectives, and subobjectives; unclear project status; and missing grant funding information. Action plans that do not detail the related objective or subobjective make it difficult to determine the linkage between project accomplishments and the Border 2020 Program progress. Additionally, omitting goal language or objective language without further details on why leads to confusion regarding what the Border 2020 Program is doing from year to year. When asked, Border 2020 Program staff stated that goals may have been left out because there were no projects under that goal for a particular year.

We also found that Border 2020 Program project status was reported differently between action plans. For Region 9, project status information was listed in a separate status column within the 2017–2018 action plan called "progress" using four categories: "initial progress," "moderate progress," "significant progress," or "deliverable achieved." In Region 6, project status information was included under a column called "status" using the categories "complete," "ongoing," and "new." However, we found that Region 6 often used an additional category called "open" and other nonstatus specific language such as "budget management." In both cases, no definition of the terms used was provided, and the actual status was unclear. Additionally, we found instances when the action plan included relevant information on project status, but it was mixed with information regarding next steps, making it difficult to determine the actual progress of these projects. The lack of clear and concrete language that is used consistently across action plans makes these documents unreliable for tracking progress toward Border 2020 Program goals.

Furthermore, according to the Border 2020 Program Communication Strategy, all action plans, including the Policy Forums action plans, should be updated every two years. However, we found that Policy Forums action plans have never been updated—the 2013 draft is the only version available. Moreover, as of the issuance of this report, all the 2013 Policy Forums action plans available on the EPA's Border 2020 Program website are still drafts. Therefore, no recent accomplishment data, funding amounts, or status information are provided. When asked, Border 2020 Program staff stated that they had intended for the Policy Forums items to be included in the regional action plans. Based on our audit, it was unclear whether any items in the regional action plans were former Policy Forums action plan items.

Environmental Indicators Are No Longer Tracked

The Border 2020 Program indicator reports provide information on the status and trends of environmental quality in the U.S.-Mexico border region. However, we found that the most recent indicator report was developed in 2016 and was published as an interim report. As a result, available Border 2020 Program indicator data are limited to the time frame of the 2016 Interim Indicator Report. We also found that no further data or reports related to Border 2020 Program

indicators have been developed by the Border 2020 Program after the 2016 Interim Indicator Report was published.

Per the Border 2020 Program, a second indicator report was to be published in 2018. During interviews with OITA staff, the OIG was informed that the Border 2020 Program was not planning to create any additional indicator reports as a means of tracking progress toward Border 2020 Program goals and objectives because the program shifted from using outcomes (results and accomplishments) to outputs (activities and services). OITA staff also stated that they no longer had the resources to develop an additional indicator report. Without an additional means to track established Border 2020 Program environmental indicators, the program remains unable to determine whether it is accomplishing its stated goals and objectives.

Border 2020 Program Lacks Transparency

The EPA's 2018–2022 Strategic Plan states that one objective of the Agency is to "increase transparency and public participation." In addition, the Border 2020 Program Communication Strategy details how internal and external communication should be executed. During our audit, the OIG found that the Border 2020 Program can be more transparent in sharing its results with the public and has not effectively implemented its communication strategy. Specifically, we found that the program has not shared many Border 2020 Program products, such as reports, studies, videos, and other tools, and other outcomes from program-funded projects. Also, available external documents provided limited information on program progress toward goals and project accomplishments.

Border 2020 Program Products Not Shared with the Public

The EPA does not always share many of the Border 2020 Program accomplishments documented in internal work plans and final project fact sheets through its website and publications. Sharing more information about each project and their results could help the public track progress towards these goals and objectives.

Our analysis of a sample of subgrantee internal work plans and final fact sheets (for projects completed from 2013 through 2019) maintained by the NADB found many examples of outputs, environmental results, and other products (studies, mobile applications, etc.) that listed accomplishments. These products were not readily accessible or available from the EPA's website. For example, our analysis of 29 internal Border 2020 Program work plans identified at least ten products, such as reports, studies, and videos, or environmental outcomes impacting the public that were not easily identifiable or published in an EPA Border 2020 Program report, action plan, or other publication.

The EPA's most recent cooperative agreements with the NADB—dated September 19, 2018, with Region 9 and dated August 22, 2019, with Region 6—require the NADB to provide project performance reports with information including (1) a comparison of actual accomplishments to the outputs/outcomes established in the assistance agreement work plans for the project period and (2) environmental results (when available) achieved by the subgrantee. In addition, the Border 2020 Program Communication Strategy states that one of the objectives is to communicate Border 2020 Program progress to an external audience that includes federal and state organizations not directly involved with the Border 2020 Program, potential stakeholders, academia, the private sector, and the general public.

Border 2020 Program staff said that the project fact sheets developed by the NADB and other internal documents were too dense with project-specific information to share with the public. Staff members also said that they would have to obtain permission from the NADB to use the project fact sheets or publicize project accomplishments. However, according to the NADB, every product provided by subgrantees, including final reports and fact sheets, can be distributed to the public.

Although the EPA's Border 2020 Program website highlights many different projects, it does not provide a clear cumulative way for the public to identify the universe of funded projects, the project results, or how each of these projects contribute to the Border 2020 Program goals and objectives.[7] In addition, the public must shuffle through a host of varying documents, such as Highlights Reports, newsletters, action plans, and the interim indicator report, to try and determine Border 2020 Program achievements when work plans and fact sheets provide this information altogether (Table 2).

[7] For example, EPA Region 6 developed a Geographic Information System Project Map, available on the EPA's Border 2020 website, to showcase subgrantee projects funded by the Border 2020 Program, including a short description, project information, and status.

Table 2: Project information available through Border 2020 Program publications

Desired element	EPA action plans	EPA Highlights Reports	EPA Regions 6 and 9 newsletters	EPA 2016 Interim Indicator Report	NADB work plans	NADB fact sheets
Goal/objective	Varies	Yes	Yes	Yes	Yes	Yes
Grant amount	Varies	Varies	Varies	No	Yes	Yes
Project description	Yes	Select Only	Select Only	Select Only	Yes	Yes
Project status	Varies	Varies	Varies	Varies	Yes	Yes
Population served	No	Varies	Varies	Varies	Yes	Yes
Outputs	Varies	Select Only	Select Only	Select Only	Yes	Yes
Outcomes	--	Select Only	Select Only	By Goal Only	Yes	Yes
Accessible to the public	Yes	Yes	Yes	Yes	No	No

Source: EPA OIG analysis of Border 2020 Program documents.

By supplementing publications currently available on the Border 2020 Program website with basic information already found in subgrantee work plans and project fact sheets, the EPA could better communicate the program's progress, success, and activities. Without this information, the program is less transparent and stakeholders do not know what the EPA has funded and for what purpose.

Conclusions

The OIG recognizes that the Border 2020 Program is a unique binational program. The EPA works in conjunction with the Mexican Secretariat of Environment and Natural Resources to implement the Border 2020 Program goals and objectives across the U.S.-Mexico border. Although it is a binational program, the EPA is responsible for a significant portion of the effort, and, therefore, has the responsibility to ensure that the program is meeting its established goals and objectives. We found that the EPA is missing management controls that would support its ability to demonstrate progress toward achieving the program's environmental and public health goals and objectives. We also found that the Border 2020 Program also faces challenges regarding transparency. To mitigate these challenges, we concluded that the EPA needs to develop better management controls, meaningful measures, and consistent communication to increase the Agency's ability to manage this program.

Recommendations

To develop management controls to verify that the Border 2020 Program activities are completed, are linked to the accomplishment of program objectives, and demonstrate progress toward achieving the program's environmental and

public health goals and objectives, we recommend that the Assistant Administrator for International and Tribal Affairs:

1. Establish and implement management controls to increase reliability of the Border 2020: U.S.-Mexico Environmental Program action plans by standardizing the action plan format to include key data, such as the relevant goal, objective, subobjective, requests for proposal, grant amount, and project status.

2. Establish and implement management controls to determine how and when Policy Forums action plans will be developed.

3. Develop performance measures to track progress toward Border 2020: U.S.-Mexico Environmental Program goals and objectives.

4. Establish and implement management controls to increase transparency of the Border 2020: U.S.-Mexico Environmental Program by sharing the North American Development Bank subgrantee fact sheets on the EPA's Border 2020 Program website.

5. Establish and implement management controls to increase transparency of the Border 2020: U.S.-Mexico Environmental Program by providing stakeholder and public access, as appropriate, to the program's funded products such as studies, reports, and videos on the EPA's Border 2020 Program website.

Agency Response and OIG Assessment

The Agency agreed with our recommendations and provided planned corrective actions, milestone dates, and comments in response to our draft report. Overall, the Agency stated in its response that the OIG failed to recognize the complex dynamics of the Border 2020 Program as a binational program. The Agency also stated that the OIG failed to recognize the limitations set by grant policies and regulations that govern the work conducted with the grantee and subgrantees. The OIG held a meeting with the Agency and provided feedback on its planned corrective actions. Following the meeting, the Agency provided revised planned corrective actions for the OIG's consideration. As the Border 2020 Program ends in 2021, all the Agency's corrective actions relate to changes that will be made in the next iteration of the program—Border 2025. All recommendations are resolved with corrective actions pending.

The Agency also provided comments on the draft report, and we revised the report as we deemed appropriate. The Agency's comments are in Appendix A.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS

Rec. No.	Page No.	Subject	Status[1]	Action Official	Planned Completion Date	Potential Monetary Benefits (in $000s)
1	13	Establish and implement management controls to increase reliability of the Border 2020: U.S.-Mexico Environmental Program action plans by standardizing the action plan format to include key data, such as the relevant goal, objective, subobjective, requests for proposal, grant amount, and project status.	R	Assistant Administrator for the Office of International and Tribal Affairs	12/31/20	
2	13	Establish and implement management controls to determine how and when Policy Forums action plans will be developed.	R	Assistant Administrator for the Office of International and Tribal Affairs	12/31/20	
3	13	Develop performance measures to track progress toward Border 2020: U.S.-Mexico Environmental Program goals and objectives.	R	Assistant Administrator for the Office of International and Tribal Affairs	10/1/20	
4	13	Establish and implement management controls to increase transparency of the Border 2020: U.S.-Mexico Environmental Program by sharing the North American Development Bank subgrantee fact sheets on the EPA's Border 2020 Program website.	R	Assistant Administrator for the Office of International and Tribal Affairs	12/31/20	
5	13	Establish and implement management controls to increase transparency of the Border 2020: U.S.-Mexico Environmental Program by providing stakeholder and public access, as appropriate, to the program's funded products such as studies, reports, and videos on the EPA's Border 2020 Program website.	R	Assistant Administrator for the Office of International and Tribal Affairs	12/31/20	

[1] C = Corrective action completed.
R = Recommendation resolved with corrective action pending.
U = Recommendation unresolved with resolution efforts in progress.

Agency Comments to Draft Report

UNITED STATES ENVIRONMENTAL PROTECTION AGENC Y
WASHINGTON, D.C. 20460

JAN 14 2020

Office of
International and
Tribal Affairs

MEMORANDUM

SUBJECT: Response to Draft Evaluation Report: Management Controls Needed to Verify and Report Border 2020 Program Accomplishments - Project No. 19-0245

FROM: W.C. McIntosh,

Assistant Administrator

TO: Jeffrey Harris, Director
Program Evaluation, Special Studies

We are providing a written response to the findings and recommendations on the above- mentioned report. The response raises concerns regarding the findings in the draft report but indicates acceptance of each proposed recommendation. The response also indicates planned completion dates for all recommendations.

If you or your staff have any questions regarding this response, please contact me at (202) 564-6600 or Lisa Almodovar at (202) 564-640 I or almodovar.lisa@epa.gov.

Enclosure

Cc: Ken McQueen, RA Region 6
Mike Stoker, RA Region 9

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Comments Prepared by the Office of International and Tribal Affairs (OITA) in coordination w/ EPA Regions 6 and 9

Evaluation Report: Management Controls Needed to Verify and Report Border 2020 Program Accomplishments

January 14, 2020

General Comments

The OIG Report fails to recognize the complex dynamics within which the Border 2020 Program operation. The draft report and recommendations reflect an unrealistic expectation or incomplete understanding of the complex binational framework and relationships that must be worked through to accomplish measurable results along the U.S.-Mexico Border.

These unacknowledged relationships significantly impact strategic planning, reporting, and accountability in a way that the OIG report fails to recognize.

The OIG Report fails to recognize the limitations set by grants policies and regulations that govern the work we do with the grantee and the grantee with its sub grantees. The OIG findings state that essential documentation on Border 2020 activities is not shared, frequently unreliable, or missing.

All reports highlighted to be produced under the Border 2020 framework are on the website and accessible to the public. Based on the Border 2020 Framework the essential documents are Highlight Reports, Midterm Report (optional), Biennial Action Plans and Indicators. Except for the 2018 indicators report, all the other essential documents are on the webpage for the public to view. Other documents such as factsheets, press releases, meeting announcements as outlined in the communication strategy (https://www.epa.gov/sites/production/files/documents/comm-strategy-b20201.pdf) posted to the website are periodically reviewed by the Border 2020 Web staff and documents determined to be duplicative or outdated may be archived.

Any studies and reports from the grantee and sub-grantees are governed by grants policies and regulations.

However, as subgrantees Principal Investigators are required to present during a Task Force meeting by including the project within the Task Force agenda. Furthermore, during the RWG (Biennial) meeting a summary report of the number of projects per Goal and geographic area (State) is prepared and presented.

OIG RESPONSE: One mission of the OIG is to promote the efficiency and effectiveness of the EPA programs. Although the Border 2020 Program is a binational partnership, our audit and recommendations focus only on the role and work of the EPA. Specifically, our report recommendations aim to improve transparency and availability of basic information about Border 2020 Program projects and their results, specifically that the EPA provides this information to both program stakeholders and the general public.

Our report acknowledges that the EPA produces many reports highlighting the work and results of this program. However, the OIG audit found that the EPA does not always share through its website and publications many of the other Border 2020 Program accomplishments

documented internally. Further, the general public is not able to easily identify the universe of funded projects, their results, or how each of these projects contribute toward the Border 2020 Program goals and objectives. Supplementing what is already available on the Border 2020 Program website with basic information and results documented in subgrantee work plans and project fact sheets could help the EPA better communicate the program's progress, success, and activities.

Specific Comments

P. AT A GLANCE What we Found – 2nd paragraph 2nd sentence

'The Border 2020 Program is not planning to create any additional reports on environmental quality at the border because they lack sufficient resources".

Although we are not publishing a final indicator report the program will be creating and publishing a final highlight report to close out the Border Program and to highlight the remaining funded projects.

OIG RESPONSE: The OIG was informed during interviews with OITA staff that indicator reports would no longer be produced due to a lack of resources. Our statement was specific to indicator reports. According to the Border 2020 Program framework, Highlights Reports have a different purpose and are not the same as indicator reports.

P. AT A GLANCE What we Found. – 3rd paragraph 1st sentence

"Moreover, we found that contrary to EPA's Strategic Plan and the Border 2020 Communication Strategy, the EPA has not shared many Border 2020 products externally such as studies and reports that would help its stakeholders track the program's actions and accomplishments."

It is our impression from the OIG report draft that OIG's staff term of "Border 2020 products'' encompass more than reports/documents as defined by our framework. All reports highlighted to be produced under the Border 2020 framework are on the website. Any studies and reports from the grantee and sub-grantees are governed by grants policies and are not property of EPA.

OIG RESPONSE: Our report refers to products developed as a result of Border 2020 Program subgrantee projects (studies, mobile applications, or environmental outcomes). We modified this language in the final report. As noted above, our analysis of the EPA's grant policies and procedures provided by Regions 6 and 9 did not identify any specific policies or regulations that precludes the EPA from sharing additional information about Border 2020 Program projects and the results produced by subgrantees with the general public on its website or through its publications. Moreover, in email correspondence with the OIG, staff from the NADB stated that the EPA can distribute every product provided by subgrantees, including final reports and fact sheets, to the public.

P.AT A GLANCE What we Found. - 3rd paragraph 2nd sentence

"Thus, the status of Border 2020 activities is neither transparent and nor accessible to the public. "

All reports highlighted to be produced under the Border 2020 framework are on the website and accessible to the public. Based on the Border 2020 Framework: the essential documents are Highlight Reports, Midterm Report (optional), Biennial Action Plans and Indicators. Except for the 2018 indicators report, all the other essential documents are on the webpage for the public to view. Other documents such as factsheets, press releases, meeting announcements as outlined in the communication strategy (https://www.epa.gov/sites/production/files/documents/comm-strategy-b2020_1.pdf) posted to the website are periodically reviewed by the Border 2020 Web staff and documents determined to be duplicative or outdated may be archived.

Any studies and reports from the grantee and sub-grantees are governed by grants policies and regulations.

However, as subgrantees Principal Investigators are required to present during a Task Force meeting by including the project within the Task Force agenda. Furthermore, during the RWG (Biennial) meeting a summary report of the number of projects per Goal and geographic area (State) is prepared and presented.

OIG RESPONSE: Our audit found that the general public is not able to easily identify the universe of funded projects, their results, or how each of these projects contribute toward the Border 2020 Program goals and objectives. Although the EPA's website and publications produced under the framework are accessible, the public must sort through action plans and different documents (Highlights Reports, newsletters, interim indicator reports, etc.) to identify basic information about Border 2020 Program projects and achievements.

The Border 2020 Program Communication Strategy states that one of its objectives is to communicate Border 2020 Program progress to an external audience not directly involved with the Border 2020 Program—the general public, potential stakeholders, academia, and the private sector. Supplementing available information with basic information from internal documents could help the EPA could better communicate the program's progress, success, and activities to the public.

Report-

P.01 Background, Last sentence

"The program has had three iterations since its inception in 1992."

If by inception you mean the signing of the La Paz Agreement, then it should be 1983 not 1992.

OIG RESPONSE: The OIG has modified the sentence in the final report.

P. 01 footnote

The IBEP was the first "program" not "agreement".

OIG RESPONSE: The OIG has modified the sentence in the final report.

P.02 1st paragraph, 2nd sentence

62.14 Miles

OIG RESPONSE: The report indicates "over 60 miles," which is accurate.

P.04 2nd paragraph, 2nd sentence Border 2020 Project Process

The regions, NADB and border offices lead the effort to develop gap analyses.

OIG RESPONSE: This information is already stated within the report. No further change is needed.

P.04 2nd paragraph, 5th sentence Border 2020 Project Process

The NADB, with consensus with EPA staff, selects the Border 2020 sub-grantee projects and then oversees the sub-grantee/projects, in accordance with NADB's Technical Assistance Contract.

OIG RESPONSE: The OIG has modified the sentence in the final report.

P.05 1st paragraph, 2nd sentence 2020 Project Process (cont)

The work plans are completed at the beginning of the grant cycle and they are used by the Border 2020 staff and NADB frequently throughout the project life cycle to determine if the projects are on track. For example, R6 holds bimonthly face to face meetings at the El Paso Border Office.

OIG RESPONSE: The OIG has modified the sentence in the final report. The example above was not included in the final report.

P.07 last paragraph, 2nd sentence Results

Based on the Border 2020 Framework: the essential documents are Highlight Reports, Midterm Report (optional), Biennial Action Plans and Indicators, which are all public documents on the Border 2020 Webpage. In addition, at each Regional Workgroup or Taskforce Meeting, which meets at a minimum annually, key and ongoing activities within each reg ion are reported, including, sub-grantee reporting on detailed progress of their projects. EPA has internal mechanisms to track progress and completion of the subgrantee projects, as well as the gap analyses to measure completed Program Goals and objectives.

EPA Regions follow Grant and Subgrantee Guidance and Policies with regard to sub-grantee products. NADB is responsible for the completion of the sub-grantee projects and reports. EPA ensures that a summary of these projects is included in the Highlights Report. EPA Reg ion 6 developed a GIS Project Map, available on B2020 website, to showcase each of the subgrantee projects funded since the beginning of the Border 2020 Program, including a short description and key relevant project information and status (https://www.epa.gov/border2020/projects - funded-under-border-2020-program-along-borders-epa-region-6-states-tx-nm).

OIG RESPONSE: The last sentence of the paragraph states that the "EPA has not shared many Border 2020 Program funded products externally." The OIG recognizes that there are funded products that the Border 2020 Program has shared with the public, in particular, through the Region 6 Geographic Information System map.

P.08 2nd paragraph, 5th sentence - Action Plan Information is Unreliable "Specifically, when we reviewed action plans for 2013-2018, we found that action plans frequently differed in format, had incomplete information and did not provide updated information."

For clarification: The two R6 action plans are similar and meet what is defined in the Border 2020 Framework page 40. Items may vary related to geographic areas and are at the discretion of the RWG Chair's direction.

OIG RESPONSE: As stated in the report, we found inconsistencies between action plans including ones within the same region. Additionally, during the course of the audit, we were not informed, nor did we find any indication, that action plans are at the discretion of the Regional Work Group chair.

P.08 last paragraph, 2nd sentence - Action Plan Information is Unreliable

"These included a failure to identify goals, objectives and sub-objectives, unclear project status and missing grant funding information."

For clarification: R6 Action plans omitted sub-objectives in those areas which they are not applicable to (i.e. Goal 1 there are no air sheds in the 4-state region), or where there were no funded projects during the two-year period. Also, funding information is only provided for EPA/NADB Border funded projects. For partner-funded projects, the information is le ft blank. This will be clarified in future action plans.

OIG RESPONSE: The OIG agrees with the EPA's proposal to clarify omitted information in future action plans.

P.08 last paragraph, 3rd sentence -Action Plan Information is Unreliable

"Additionally, omitting goal language or objective language without further details on why leads to confusion regarding what the Border 2020 Program is doing from year to year".

As stated in the previous comment, R6 Action plans only list Goals and Objectives that have a Border funded project associated. Additional information will be added to future action plans to clarify this practice and emphasize that Goals and Objectives language within the Action Plans are not re-written; what it is updated are measures or projects for the duration of the 2-Year Action Plans.

OIG RESPONSE: The OIG agrees with the EPA's proposal to clarify omitted information in future action plans.

P.09 2nd paragraph, Border 2020 Program Lacks Transparency

“EPA' s 2018- 2022 Strategic Plan states that one objective of the program is to " increase transparency and public participation." In addition, the Border 2020 Communication Strategy detailed how internal and external communication should be executed. During our review, the OIG found that the Border 2020 Program is not transparent in sharing its results and has not effectively implemented its communication strategy. Specifically, we found that the program does not provide access to Border 2020 products (such as reports, studies, videos, and other tools) and other outcomes from funded projects. Also, available external documents provided limit ed information on program progress toward goals and project accomplishments."

All reports highlighted to be produced under the Border 2020 framework are on the website and accessible to the public. Based on the Border 2020 Framework: the essential documents are Highlight Reports, Midterm Report (optional), Biennial Action Plans and Indicators. Except for the 2018 indicators report, all the other essential documents are on the webpage for the public to view. Other documents such as factsheets, press releases, meeting announcements as outlined in the communication strategy (https://www.epa.gov/sites/production/files/documents/comm- strategy-b2020 1.pdf) posted to the website are periodically reviewed by the Border 2020 Web staff and documents determined to be duplicative or outdated may be archived.

Any studies and reports from the grantee and sub-grantees are governed by grants policies and regulations.

However, as subgrantees Principal Investigators are required to present during a Task Force meeting by including the project within the Task Force agenda. Furthermore, during the RWG (Biennial) meeting a summary report of the number of projects per Goal and geographic area (State) is prepared and presented.

OIG RESPONSE: The OIG modified the language in the final report. As stated previously, our audit found that the EPA does not provide the public with easy access to Border 2020 Program products (such as reports, studies, videos, and other tools) and other outcomes from funded projects. Although the EPA’s website and publications produced under the framework are accessible, the public must sort through action plans and different documents (Highlights Reports, newsletters, interim indicator reports, etc.) to identify basic information about Border 2020 Program projects and achievements. As a result, the public and program stakeholders cannot be aware of the full range of Border 2020 Program projects and accomplishments.

Sharing more information about each project and their results (from already available internal documents) could help the public track progress towards these goals and objectives.

P.10 4th paragraph, Border 2020 Products not shared with the public

" Our review of a sample of sub-grantee internal work plans and final fact sheets (2013-2019) maintained by the NADB found many examples of outputs, environmental results and other products (e.g. studies, mobile applications, etc.) that listed accomplishments but were not readily accessible or available from the EPA' s website. For example, our review of29 internal Border 2020 work plans identified at least 10 products (reports, studies, videos and other tools) or environmental outcomes

impacting the public that were not easily identifiable or published in the EPA Border 2020 report, action plan or other publication."

We proceed accordingly, pursuant to the NADB and EPA Cooperative Agreement Grant Contract and do summarize each individual sub-grantee project funded or that will be funded, which is the commitment that is out lined by EPA in the Framework Document. EPA adheres to the EPA Grant and Subgrantee Policies and Guidances, therefore, in accordance with EPA-NADB Cooperative Agreement, NADB is owner of these individual tools/final reports, etc. and it is up to them to determine if and how to distribute the information submitted by subgrantees.

As previously stated, based on the Border 2020 Framework: the essential documents are Highlight Reports, Midterm Report (optional), Biennial Action Plans and Indicators. Except for the 2018 indicators report, all the other essential documents are on the webpage for the public to view. Other documents such as factsheets, press releases, meeting announcements as outlined in the communication strategy (https://www.epa.gov/sites/production/files/documents/comm- strategy-b2020 1.pdf) posted to the website are periodically reviewed by the Border 2020 Web staff and documents determined to be duplicative or outdated may be archived.

OIG RESPONSE: Our review found that the EPA does not always share through its website and publications many of the Border 2020 Program accomplishments documented in internal work plans and final project fact sheets. As a result, the public cannot be aware of the full range of Border 2020 Program projects and accomplishments. Sharing more information about each project and their results could help the public track progress towards these goals and objectives. In email correspondence with the OIG, staff from the NADB stated that the EPA can distribute every product provided by subgrantees (final reports, fact sheets, etc.) to the public.

P. 11 First paragraph, last sentence - Border 2020 Products 1101 shared with the public " However, according to NADB, every product provided by sub-grantee (final reports), fact sheets, etc.) can be distributed to the public".

Note that distribution is limited pursuant to EPA' s and NADB's Collaborative Agreement language with final distribution of these products made by consensus among EPA and NADB' s Project Officers. As per NADB and their Subgrantee' s contract, information is distributed to the public when the sub-grantee' s Principal Investigator presents it during the Task Force public meeting.

OITA provides the results of completed projects through summaries within the Highlights/Accomplishments Report. These reports are available on the Border 2020 website.

OIG RESPONSE: Please see response above.

P. 11 last paragraph of page on Border 2020 Products not shared with the public

EPA R6 did publish a GIS project tracking tool that highlights geographically basic information of projects funded under the EPA - NADB Collaborative Agreement. This GIS map include projects funded under RFPs from FY 2013 to present.

OIG RESPONSE: The OIG modified the final report to include a footnote regarding the Region 6 Geographic Information System work.

P. 12, 1st Paragraph, 6th line - to end paragraph of Conclusion

"The EPA is missing management controls that would support its ability to demonstrate progress toward achieving the program's environmental and public health goals and objectives."

We suggest the word "externally" be added to this sentence. Since we do have internal resource mechanisms in place such as the R6' s Metric Goal of completed projects, added to R6 and R9's GAP Analyses, action plans, and R6' s GIS mapping of B2020 NADB's funded projects which show progress.

OIG RESPONSE: Our audit found the need for improvements to internal and external elements. Therefore, adding the word “externally” would be contrary to our findings and conclusions.

Corrective Action and Milestones Table

Revised (January 22, 2020)

OIG Comment: The EPA originally provided proposed corrective actions and milestone dates for OIG consideration on January 14, 2020. Following a January 21, 2020, meeting between the OIG and the Agency, the EPA provided the revised planned corrective actions presented below. We reviewed the revised corrective actions and consider these recommendations resolved with corrective actions pending.			
#	**OIG RECOMMENDATIONS**	**AGENCY PLANNED CORRECTIVE ACTION**	**MILESTONE**
1	Establish and Implement management controls to increase reliability of Border 2020 Program action plans by standardizing the action plan format to include key data such as the relevant goal, objective, subobjective, requests for proposal, grant amount and project status.	OITA agrees and recognize the advantage toward Action Plans Format standardization to establish and implement management controls that increase reliability of the Border program's action plans. OITA, in coordination with NPMs and Regional Border Offices, will develop a standard format for the Border 2025 Action Plans that should include key data such as; the goal, objective, subobjective, requests for proposal, grant amounts and project status to the extent that the key data conforms with the new program. Note: The developed action plans will allow for flexibility within RWG's and Task Forces in the spirit of fomenting the border program bottom up work as each region may have differences.	Complete by end of 1st quarter FY '21
2	Establish and implement management controls to determine how and when Policy Fora action plans will be developed.	OITA agrees that there should be establish and implementable management controls that help determine how and when policy fora action plans will be developed. OITA will establish and implement management controls for the Border 2025 program policy fora action plans, if identified and negotiated. Policy Fora Action/Activities are being considered in the Accountability of the Border 2025 framework and will be reflected or include in the regional action plans, if required. Note: Border 2020 Policy Fora did not require action plans. All activities of the Border 2020 Program where implemented at the regional level.	Complete by end of 1st quarter FY '21

3	Develop performance measures to track progress toward Border 2020 Program goals and objectives.	OITA agrees that the program should have performance measures to track progress toward the Border Program goals and objectives. OITA will develop Border 2025 program performance measures in consultations with NPM's and Regional Border Offices and in line with the Agency LEAN effort.	Complete by beginning of 1st quarter FY '21
4	Establish and implement management controls to increase transparency of the Border 2020 Program by sharing North American Development Bank sub-grantee fact sheets on EPA's Border 2020 Program website.	OITA agrees that sharing of NADB's sub-grantees fact sheets will increase programs transparency. OITA, in coordination with the Regional Border Offices, the NADB and the EPA Grants Office will establish and implement management controls; as allowed by the grants terms and conditions, and grant policies and regulations, to increase sharing of sub-grantee project such as fact sheets on the NADB's website. EPA will provide a link on the future Border 2025 website to those materials on NADB's website as NADB is the grantee.	Complete by end of 1st quarter FY '21
5	Establish and implement management controls to increase transparency of the Border 2020 Program by providing stakeholder and public access, as appropriate, to border 2020 funded products such as studies, reports and videos on EPA's border 2020 website	OITA agrees that sharing of Border Program funded products such as studies, reports and videos will increase programs transparency. OITA, in coordination with the NPM's and Regional Border Offices will establish and implement management controls to increase transparency of the Border Program by providing stakeholder and public access, as appropriate, to Border Program funded products such as studies, reports and videos on EPA's Border 2025 website Note: If any of the products such as studies, reports and videos, are from a sub-grantee or the NADB, EPA will then provide a link on the future Border 2025 website to those materials on NADB's website.	Complete by end of 1st quarter FY '21

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