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**1999 ECOS-EPA NEPPS Workshop
Breaking Down Barriers for Environmental Results
November 30 - December 2, 1999
Baltimore, Maryland**

**Workshop Report
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Report of the

1999 ECOS-EPA NEPPS Workshop
“Breaking Down Barriers for Environmental Results”
November 30 - December 2, 1999
Baltimore, Maryland

I. Executive Summary

A. Overall meeting summary

The U.S. Environmental Protection Agency (EPA) and the Environmental Council of the States (ECOS) co-sponsored a workshop on November 30 - December 2, 1999, for State and EPA personnel who are responsible for implementing the National Environmental Performance Partnership System (NEPPS). **Approximately 160 representatives** from 26 States, nine EPA Regional offices and EPA Headquarters attended the meeting. The workshop was designed primarily for high- to mid-level staff responsible for coordinating NEPPS implementation and policies in the States, EPA Regions and Headquarters.

The workshop’s primary goal was identifying the three top issues needing resolution to make NEPPS a success, and discussing and developing action plans to resolve those issues. The workshop’s secondary goals were providing a national forum to discuss other issues and providing basic training and information on NEPPS implementation. Workshop organizers believed a successful outcome was likely to have two components:

1. achievable recommendations for action to address two or three of the most pressing issues over the next year; and
2. a plan for defining a longer term agenda and addressing “bigger picture” issues that cannot be addressed over the next year.

The workshop’s first morning included presentations and discussions designed to set the stage for the rest of the workshop. Following the opening session, participants spent a half day each on three key issue areas: culture change, information management, and joint planning. During the evenings, volunteers consolidated many ideas into a shorter list of recommendations within each issue area. On the final morning, in plenary session, participants reviewed and discussed the shorter lists. Following the workshop, the recommendations were to be refined and integrated into a single, comprehensive set of recommendations for action.

During opening remarks, Diane Thompson, EPA Associate Administrator in the Office of Congressional and Intergovernmental Relations (OCIR), challenged participants to create a road map for NEPPS for the next year, including “things we need to focus on, agenda items for us as agency leaders in our efforts to make NEPPS more effective and constructive.” Robert Varney, commissioner of the New Hampshire Department of Environmental Services and past-president of ECOS, said NEPPS requires a culture change that will encounter resistance, requiring us to continuously improve our approach over time. NEPPS, he said, “is extremely important. It can’t be overemphasized. It allows thoughtful allocation of resources and setting direction into the next century.”

Bill Crews, NEPPS Team Leader in OCIR, said the outcomes of the workshop would be taken to ECOS at its Spring meeting in Philadelphia and to EPA's NEPPS Senior Management Team and Reinvention Action Council. The ECOS-EPA team in charge of the NEPPS Joint System Evaluation also would review the workshop results, he said.

DeWitt John of the National Academy of Public Administration (the Academy) moderated a panel of outside experts who had studied the implementation of NEPPS. The U.S. General Accounting Office recommended that EPA and the States focus on six key issues: reducing oversight, improving core performance measures, alleviating staff resistance, allowing greater grant flexibility, improving public participation, and improving Headquarters-Regional-State communication. The Office of Inspector General recommended: 1) systematically assessing state requirements; 2) developing better performance measures; 3) developing NEPPS guidance; and 4) assigning a specific office with responsibility to improve NEPPS. The Tellus Institute recommended that EPA and States: 1) stop overlaying NEPPS on the conventional program management system; 2) recommit to NEPPS as a single system for federal oversight; and 3) resolve conflicts and make the performance partnership agreement a ruling document that maximizes integration across programs. The Environmental Law Institute recommended: 1) Congress should authorize NEPPS concepts of flexibility and workload shifting; 2) EPA and States should invest in data collection, consolidation and streamlining; 3) planners should engage program managers in identifying priority work and deferring non-priority work. A Georgetown University researcher recommended four ways to improve performance measurement systems: regional cooperation, stakeholder involvement, an academic consultant, or legislative pressure.

B. Results and next steps

During the meeting, participants produced the following recommendations for the three main issue areas:

1. Culture Change

Communication

1. EPA should to sponsor NEPPS meetings for the Regional and national program managers to reinforce the importance of NEPPS and share information among States. (Short and Long Term)
2. EPA should better reflect/promote NEPPS on the EPA Web Page. (Short term)
3. EPA should to include NEPPS in the EPA Annual Performance Report. (Short term)
4. EPA, States, and ECOS should send a recommitment memo from Administrator, National Program Managers, Regional Administrators, and the Commissioners (States) with ECOS. (Short term)
5. EPA and ECOS need to develop a communication strategy and outreach plan. (Long term)

Accountability

6. EPA and ECOS need to identify a new group of NEPPS champions within the States, EPA Headquarters, and Regions. (Short term)
7. EPA and ECOS need to define differential oversight. (Long Term)
8. EPA and States need to define roles responsibilities of States, EPA, and National Program Managers. (Long Term)

9. ECOS should prepare a NEPPS recommitment document for discussion /strategies on the State/EPA relationship at its Spring meeting. (Short Term)
10. EPA should include NEPPS in EPA management reviews and EPA and States need to include NEPPS in employee performance standards at all levels. (Long Term)

Measurement

11. EPA and States need to commit more to performance-based outcomes and ensure accountability for those outcomes.(Long Term)
12. EPA and ECOS need to better define reporting requirements -- of what and to whom.(Long Term)
13. EPA needs to implement more outcome-based audits by EPA, not audits of activities. (Long Term)

Integration

14. EPA needs to recognize importance of NEPPS and integrate it into their Strategic Plan. (Short Term)
15. EPA and State program managers need to spend more time up front evaluating performance outcomes vs. negotiating output activities. (Long Term)
16. EPA needs to align the Government Performance and Results Act (GPRA), core performance measures (CPMs), national databases, and measures identified by the Center for Environmental Information and Statistics (CEIS) (one set of measures). (Long Term)
17. EPA and States need to align and integrate all program and operating agreements with NEPPS.(Long Term)

Information Sharing

18. EPA and ECOS need to compile a Best Management Practices Manual that provides “helpful hints for success” and includes suggestions or successful programs. (Short Term -- and continued)

2. Information Management

1. Endorse efforts to develop a Best Management Practices manual for performance measurement systems; include benchmarking of lessons learned in previous efforts from States and industry. (The workgroup's knowledge transfer team was to meet in Baltimore on Dec. 3 to move forward on this initiative.) (Short term)
2. Assess current alignment of various national performance measures and recommend next steps for pursuing alignment. The group's long-term goal is one set of measures. (Short term)
3. Inventory existing work at the State, federal and local levels to address the question of what information users (environmental managers, general public, academics, etc.) want to know. (Short term)

3. Joint Planning

1. Recommit EPA and State leadership. (Short term)
2. Write "letters of interest" from Headquarters to Regional administrators, Regional administrators to States, States to Regional administrators. (Short term)
3. Establish definitions and boundaries for joint planning and flexibility, and undertake pilots. (Short term)

4. Inter-personnel Act assignments (IPAs) from EPA to States – leverage federal resources to do more in-State work. (Near short term)
5. Increased face-to-face meetings. (Near short term)
6. EPA Annual Performance Report (APR) should specifically acknowledge and value different approaches to environmental protection (specifically NEPPS). (Near short term)
7. Sharing of experiences – clearinghouse. (Short term)
8. Work commitments from EPA to States to do work that contributes to environmental progress in the State, not just oversight of the State programs. (Short term)
9. Align CPMs, GPRA, databases, CEIS 10 questions, Associated Reporting Requirements (ARRs). (Short term)
10. Timing: National Program Manager (NPM) guidance early. (Short term)
11. Continued flexibility re forward funding. (Short term)
12. Early State/Regional involvement in guidance and priority development. (Short term)
13. Re-examine GPRA (now being done). (Short term)
14. Find out what Regions require [both] workplans and PPAs and why. (Near short term)
15. Revisit delegation agreements. (Near short term)
16. Reduce initiatives and align with NEPPS. (Short term)

Following the workshop, the workshop steering committee condensed the final recommendations into a set of tables, as shown on pages 41-45. These recommendations were to be reviewed by EPA's NEPPS Senior Management Team and Reinvention Action Council, as well as ECOS' Strategic Planning Committee. An ECOS-EPA committee working on a joint assessment of NEPPS also was to review the results.

II. Introduction

A. Background and Purpose of Meeting

The U.S. Environmental Protection Agency (EPA) and the Environmental Council of the States (ECOS) co-sponsored a workshop on November 30 - December 2, 1999, for State and EPA personnel who are responsible for implementing the National Environmental Performance Partnership System (NEPPS). Maryland Department of the Environment and U.S. EPA Region 3 hosted the workshop at the Sheraton Inner Harbor Hotel in Baltimore, Md. Approximately **160 representatives** from 26 States, nine EPA Regional offices and EPA Headquarters attended the meeting. The workshop was designed primarily for high- to mid-level staff responsible for coordinating NEPPS implementation and policies in the States, EPA Regions and Headquarters. It was meant to build on a similar November 1997 NEPPS workshop in Providence, R.I., and recent efforts to improve and expand State-EPA partnerships throughout the country.

Workshop planners acknowledged that, since NEPPS was launched in May 1995, States and EPA have made considerable progress in forming partnerships to achieve better environmental protection. As with any new system, we have encountered various challenges and barriers to success along the way. Those barriers and challenges had been researched and documented by EPA's Inspector General, the General Accounting Office and the National Academy of Public Administration. Therefore, representatives from those organizations were invited to present their findings to the workshop participants.

The workshop's primary goal was identifying the three top issues needing resolution to make NEPPS a success, and discussing and developing action plans to resolve those issues. Interested State and EPA staff helped identify the top issues during a pre-workshop survey. The workshop's secondary goals were providing a national forum to discuss other issues and providing basic training and information States and EPA staff need to succeed at NEPPS.

B. The Process

In order to develop recommendations for improving NEPPS, the agenda began with a broad set of issues and recognized that participants would have diverse perspectives on these issues. During the workshop, sessions were sequenced and structured to narrow the focus to a short list of priority issues and, hopefully, to reach agreement regarding how to address these issues.

Workshop organizers believed a successful outcome was likely to have two components:

1. achievable recommendations for action to address two or three of the most pressing issues over the next year; and
2. a plan for defining a longer term agenda and addressing "bigger picture" issues that cannot be addressed over the next year.

The workshop also was designed to build upon previous NEPPS-related meetings, discussions and studies. Participants were asked to review policy statements and memoranda that have described NEPPS since its creation in May 1995. The workshop planning committee considered results of the 1997 workshop in Rhode Island, as well as a May 1999 EPA NEPPS meeting in Denver, Colorado.

The workshop's first morning included presentations and discussions designed to set the stage for the rest of the workshop. Following the opening session, participants spent a half day each on three key issue areas: culture change, information management, and joint planning. During the evenings, volunteers consolidated many ideas into a shorter list of recommendations within each issue area. On the final morning, in plenary session, the results of these efforts were presented and discussed. Following the workshop, the recommendations were to be refined and integrated into a single, comprehensive set of recommendations for action.

C. Opening Remarks

Diane Thompson, EPA Associate Administrator for Congressional and Intergovernmental Relations (OCIR), told participants she hoped the workshop would produce tangible and productive outcomes that would build on the progress States and EPA had made in the past 20-25 years in protecting the environment. It is challenging to create truly effective day-to-day partnerships and to move the focus from outputs to outcomes, she noted. She challenged participants to create a road map for NEPPS for the next year, "things we need to focus on, agenda items for us as agency leaders in our efforts to make NEPPS more effective and constructive."

Robert Varney, commissioner of the New Hampshire Department of Environmental Services and past-president of ECOS, described how NEPPS had enabled his agency to devote resources to important priorities, such as mercury reduction and discouraging sprawl. NEPPS allows States to achieve the goals of EPA and Congress, while providing flexibility to tailor to their individual needs, he said. NEPPS requires a culture change that will encounter resistance, requiring us to continuously

improve our approach over time, he said. He also acknowledged the difficulty of getting stakeholders involved, but noted how important it is to get them engaged in how public dollars should be spent. NEPPS, he said, “is extremely important. It can’t be overemphasized. It allows thoughtful allocation of resources and setting direction into the next century.”

Bill Crews, NEPPS Team Leader in OCIR, described the process for participants. The outcomes of the workshop, he said, would be taken to ECOS at its Spring meeting in Philadelphia and to EPA’s Senior Management Team and Reinvention Action Council. The ECOS-EPA team in charge of the NEPPS Joint System Evaluation also would review the workshop results, he said.

D. NEPPS Vision - Facilitated Discussion

Madeline Snow of the Massachusetts Department of Environmental Protection led a facilitated discussion among the participants, asking them to provide a list of words describing their experience with NEPPS to date. Those words were: frustrating, time-consuming, challenging, rewarding, complicated, humorous, stimulating, lonely, beneficial, learning, confusing, exciting, improving and variety (good and bad). Participants agreed they would like NEPPS to be less frustrating, time-consuming, complicated, and lonely. Asked to list other words that they would like to have experienced, participants said: flexible, useful, empowering, worthwhile, strategic, open, visionary, results, streamlined, successful, collaborative, environmental results, supported, established, innovative and integrated.

Ms. Snow reminded participants of the overarching principles in the 1994 Joint Policy Statement on State/EPA Relations, which called for:

1. Clear Goals and Expectations
2. Clear Roles and Responsibilities
3. Open and Honest Communication
4. Shared Responsibility and Accountability for Success
5. Mutual Respect, Trust and Continuous Improvement
6. Mutual Commitment and Pollution Prevention

She also reminded participants of the original principles behind NEPPS, as outlined in the May 1995 agreement:

1. Continuous environmental improvements are desirable and achievable throughout the country.
2. A core level of environmental protection must be maintained for all citizens.
3. National environmental progress should be reported using indicators that are reflective of environmental conditions, trends and results.
4. Joint USEPA/State planning should be based on environmental goals that are adaptable to local conditions while respecting the need for a “level playing field” across the country.
5. USEPA/State activity plans and commitments should allocate federal and State resources to the highest priority problems across all media, and should seek pollution prevention approaches before management, treatment, disposal and cleanup.
6. The new approach to the USEPA/State relationship should facilitate and encourage public understanding of environmental conditions and government activities.
7. A differential approach to oversight should provide an incentive for State programs to perform well, rewarding strong State programs and freeing up federal resources to address problems where State programs need assistance.

NEPPS recognized that States and EPA had to change their approach in order to ensure better environmental results, Ms. Snow said.

Ms. Snow asked participants to answer two questions:

- 1) What are you worried about regarding the NEPPS system?
- 2) What don't you want to happen to NEPPS?

Their responses then were divided into categories that matched the workshop's three issue areas:

How NEPPS Should Change the Status Quo (Culture Change)

- Backsliding into old ways of doing business (management systems demanding detailed accountability, Government Performance and Results Act (GPRA) driving the process, top-down EPA-directed)
- Stagnating where it is
- An irrelevant, voluntary system
- (NEPPS would) go away
- Strategic planners will be left with it and the rest of the agency would go its own way
- Deteriorating State-federal relationship
- Stand-alone monolith
- Lack of congressional and State legislative support
- Politics/corporate change at EPA
- Not an understanding by rank and file of what NEPPS is all about
- Management not bought in (State and federal)
- Slide into either/or thinking (GPRA vs. NEPPS; beans vs. outcomes)
- Management waiting it out, wanting to go back to old system (bureaucratic inertia)

Using Environmental Information for Decision-making

- GPRA seen as an opposing force vs. something that could work in partnership
- Focus on beans rather than environmental results
- Never able to measure success or environmental improvement
- Seen as a failure if no improvements in a short time
- Lack of accountability
- Tool for flexibility rather than improved environmental results

Joint EPA/State Planning

- Resource allocations and funding
- Limited amount of funding in the Performance Partnership Grant (PPG) process
- "Creep" of earmarked dollars
- Lack of attention to base programs
- New goals over system

Ms. Snow noted that some don't want NEPPS to survive because it takes away their money or power. In other areas, she said, there is good-hearted backsliding because people are concerned about their important issues. She emphasized the need to recommit to NEPPS at the State and federal levels. NEPPS is growing and makes sense, she said. It is efficient and has the potential to bear "wonderful fruit." States and EPA need to get NEPPS firmly established and institutionalize it to protect it from outside attacks, she concluded.

E. Review of NEPPS Studies

DeWitt John of the National Academy of Public Administration (the Academy) moderated a panel of outside experts who had studied the implementation of NEPPS within States and EPA. The Academy is working on a \$2 million study that will offer recommendations for the next EPA Administrator and Congress. EPA-State relations under NEPPS will be an important part of that study, Mr. John said.

1. General Accounting Office Review of NEPPS

Peter Guerrero of the U.S. General Accounting Office (GAO) said this is a revolutionary time in environmental protection, and performance partnerships are central to that revolution. A 1988 GAO management review of EPA concluded that the agency was too prescriptive and not flexible or results-oriented enough. GAO recommended then that EPA and States work together to develop a new framework for improving results and efficiency, he said.

For its most recent review of NEPPS, which was released in June 1999, GAO wanted to review the status of NEPPS agreements and grants, progress in performance measurement, the extent to which oversight had changed, and benefits to date, Guerrero said. GAO found that participation had grown from six pilot States in 1995 to 45 States in 1998, although it found a variation in depth of participation. GAO also documented the following challenges in developing the NEPPS system:

Challenges in Developing Results-Oriented Measures

- No baseline data
- Difficulty in quantifying results
- Difficulty in establishing causal relationships
- Resources are needed for high-quality performance measurement
- Easier to define costs (short-term) than benefits (long-term)
- Change in economy (industrial vs. service, impacts of sprawl, housing, vehicle miles traveled)

GAO also documented some success in developing FY2000 core performance measures, Guerrero noted, showing that developing measures requires continuous improvement over time.

Challenges of Reforming Oversight: Guerrero noted that initial expectations among States for reforming oversight were “extremely high.” The amount of oversight reduction directly attributable to NEPPS is difficult to determine, he said. Federal laws in some instances reduce the opportunities to reduce oversight because mistrust is built into the system. There is some lack of assurance that environmental protection won’t suffer if EPA relaxes oversight of States. GAO also documented some resistance to change at the lower levels, and difficulties communicating through EPA’s multi-level organizational structure. Guerrero said EPA needs to address its culture directly, and that the agency’s structure creates difficulty in communicating a consistent message.

Benefits of NEPPS: GAO found NEPPS creates greater buy-in for innovation and more flexibility in funding. It allows States and EPA to divide the workload and opens the process to public participation.

NEPPS is at a crossroads, he said. The benefits should be greater and improvements are needed. GAO is concerned about the resource investment required by participating States and absence of reduced oversight. It recommended that EPA and the States begin a joint evaluation process to seek agreement on six key issues:

- 1) developing a set of flexible guidelines for implementing NEPPS and reducing oversight;
- 2) identifying what additional work is needed to improve the FY2000 core performance measures;
- 3) alleviating the resistance among some State and EPA staff through training and other strategies;
- 4) allowing greater use by States of flexibility envisioned under the Performance Partnership Grant (PPG) system;
- 5) determining how to improve public participation in the NEPPS process; and
- 6) improving communication among Headquarters, Regions and States during NEPPS-related negotiations.

2. Inspector General Review of NEPPS

Jeff Hart, Denver Audit Manager for the Office of Inspector General in Region 8, described the OIG's management assistance reviews of NEPPS in 8 of 10 EPA Regions and audits of PPGs in Regions 4, 6 and 8. Significant findings included:

- Improved communication of goals, priorities and responsibilities between States and EPA Regions. Regional staff are recognizing State priorities for the first time.
- Flexibility has been impeded by a lack of resources. Regions also lack guidance on how to address core program requirements and still have money left over to address State priorities.
- The transition to outcome measures has been difficult, due to absence of baseline data, lack of guidance and examples, and little trust between Regions and States
- The NEPPS/PPG system is not fully supported by management and staff, which has led to unfulfilled expectations. A lack of guidance and training have led to disagreements on implementation.

Based on its review, the Inspector General made the following recommendations:

- 1) Conduct a systematic assessment of what states have been required to do and whether they contribute to environmental results. Reduce the layering of activity requirements on top of outcome measures.
- 2) Develop better performance measures that achieve accountability and focus on results. The New England environmental goals and indicators partnership could be used as a model to help States develop good performance measurement systems.
- 3) Develop NEPPS guidance.
- 4) Assign a specific office with clear responsibility, authority, staff and resources to improve NEPPS.

3. Tellus Institute Review of NEPPS

Jeanne Herb, formerly with the New Jersey Department of Environmental Protection, described the Tellus Institute's study of several NEPPS agreements. The study, conducted under contract to the Academy, found that NEPPS had:

1. Contributed to improving State-federal relationships by better defining roles and responsibilities, creating a more productive working relationship at the highest levels, identifying some work-sharing opportunities, and identifying some mutual priorities. Tellus found NEPPS had not led to joint priority-setting or improved the State-EPA enforcement relationship, however.
2. Led to administrative savings through consolidation of grants and planning systems.

3. Led to some limited reprogramming of funds.
4. Led to some flexibility that enabled programs to initiate programmatic innovations.
5. Failed to create differential oversight, thus giving States no particular carrot for entering NEPPS. Core performance measures are a positive step but have increased the burden on States for information gathering and reporting.
6. Led to more integrated planning.

Herb noted that, due to the lack of specific guidance or prescription from EPA as well as a host of factors at individual States and Regions, Tellus researchers found a wide variety of “NEPPS experiences” in the States they studied.

Tellus also identified four circumstances under which NEPPS delivers its maximum value to participants:

1. When the performance partnership agreements (PPA and PPG) become the ruling documents in an agency and function as an operational tool on the shop floor. In States where NEPPS is more a planning document than operational tool, its value is lessened.
2. When the PPA integrates all program commitments
3. When grants are consolidated
4. When there is a high level of commitment, vision and aggressive push for NEPPS at the State and Regional level.

Existing obstacles to NEPPS include the single-medium culture at both EPA and the States and program-by-program management of PPGs, multiple ruling documents such as delegation agreements and memoranda of understanding (MOUs), the uncertain scope for flexibility and federal oversight, barriers to measuring and managing for performance, and conflicting visions of enforcement’s role.

Tellus offered three recommendations for improving NEPPS:

1. NEPPS cannot continue to be overlaid on the conventional program management system. If it does, NEPPS will become marginal.
2. EPA should recommit to the original vision of NEPPS as a single system for federal oversight. Culture change will take time, but it must be promoted.
3. EPA should incorporate lessons learned through external NEPPS reviews, reaching a common understanding on federal oversight, resolving the GPRA-NEPPS conflict, bringing every State fully into NEPPS, and setting minimum standards and practices that make the PPA a ruling document and maximize integration across programs.

4. Environmental Law Institute Review of NEPPS

Lee Paddock, a former attorney in the Minnesota State Attorney General’s office, outlined the findings of an Environmental Law Institute (ELI) study conducted under contract with the Academy. ELI identified two critical issues for NEPPS’ success: 1) a clash of management cultures at EPA and States and 2) making NEPPS relevant to the program managers.

Paddock said EPA has mixed management metaphors by layering the NEPPS performance-management program over its traditional activities-based management system. NEPPS, or something like it, is critical to meeting today’s environmental challenges, but has had limited success, he said. Factors that have facilitated success in the States include a tradition of strategic

planning, strong and consistent leadership, cross-media organization and an existing emphasis on performance management. ELI offered the following recommendations:

1. **Culture Change:** Congress should authorize NEPPS and its concepts of flexibility and workload shifting. EPA and the States need senior-level champions for NEPPS, but it must also be relevant to program managers. Managers must better integrate performance measurement with program management.
2. **Information Management:** More, not less, data will be needed by the public and performance-based management systems. Still, EPA and States should review what data is important and what's not, finding ways to consolidate and streamline reporting systems. There should be more time and funding for high-priority information needs. State of the Environment Reports are a good vehicle for providing information to the public on environmental conditions.
3. **Planning:** NEPPS must engage program managers in identifying priority work and deferring non-priority work. The role of core programs must be part of the planning and priority-setting process. Constructive program auditing could strengthen planning efforts. Self assessments are a good planning tool but not a good accountability tool. Enforcement programs could support joint planning by using management tools to identify areas of concern. PPGs should be more tied to federal-State planning.

5. Georgetown University Review of Performance Measurement Systems

William Gormley, a professor at Georgetown University, described a study of State performance measurement systems conducted under contract to the Academy. Gormley studied performance measurement in Oregon, New Hampshire, Florida and Virginia. He found a number of technical, political and administrative challenges to developing good environmental performance measurement systems. Among those challenges were the following:

- Outputs are easier to measure than outcomes
- Impacts of environmental programs are extremely difficult to measure
- A lack of legislative understanding of performance measurement
- Many senior managers see performance measurement as a threat
- Managers prefer to be accountable for indicators they can control.
- Managers favor homegrown measures over national measures, which creates problems for national core performance measures.

Gormley found several methods or factors that facilitate the use of performance measures. These include Florida's focus/watch designation system that puts managers on notice when measures detect a problem, Oregon's link between performance measures and budget testimony, New Hampshire's problem-solving culture and bipartisan spirit, Virginia's gubernatorial interest, and publication of core performance measures.

Gormley also offered four recommendations for improving environmental performance measures:

- 1) Regional cooperation, such as that between EPA Region 1 and New England States;
- 2) Stakeholder involvement, such as that achieved through the Oregon Progress Board;
- 3) Hiring an academic consultant, as Florida did; and
- 4) Creating legislative pressure, as Virginia experienced.

6. Discussion

During discussion of the external studies, the following questions and issues were raised by workshop participants:

Q: Are CPMs a hindrance to performance measures?

Gormley: There are weaknesses in the current CPMs, but they are an excellent first step. EPA and States need to shift emphasis to outcomes, using State experiences to develop better outcomes in the future.

Q: What has reduced oversight looked like under NEPPS?

Herb: EPA practices de facto differential oversight, which was inherent in the system before NEPPS was created. State expectations have not been fulfilled, however. EPA needs to revisit the issue and try to establish reduced oversight as an incentive to join the system. EPA and States need to agree on differential oversight. It has to be a component for the future.

Steven Elstein, GAO: States envisioned a threshold under differential oversight at which they would achieve “oversight nirvana.” Such a system was viewed as creating winners and losers, and a potential report card on State performance. States are not at their best when competing with each other politically. Still, we did find some relatively modest reductions in oversight, including reduced reporting requirements and less paperwork under NEPPS.

Paddock: Differential oversight occurs all the time in the States. The question is whether it can be regularized in a way that makes a difference. Need to focus on program measurement, program evaluation and joint planning. Build into the system how much attention is required.

Q: How do we develop criteria for judging performance? What criteria make a difference?

Guerrero: GAO has a concern about micro-managing States. Incentives and resources are critical to making the system work. GPRA needs to be put into synch with NEPPS and CPMS.

Q: It takes resources to develop a high-quality performance measurement system. How do we develop the resources?

Elstein: Florida may be an example. Instead of tracking enforcement cases and actions, they track rates of compliance on a random basis. They can make statements about compliance rates for a sector.

Herb: You need institutional acceptance to move in that direction. You need understanding between the State and Region.

Comment: I don't think we need more guidance. When a Regional Administrator sends out a very strong message to staff and States that we want to have this relationship, you don't need a lot of guidance. When are base programs going to be evaluated with the same level of scrutiny as NEPPS?

Hart: Regional Administrator leadership creates as many problems as it solves. It can be interpreted, without guidance, as “get a PPA and PPG at any cost.” It can lead to negotiated agreements that are inadequate for accountability.

Paddock: Core programs are a critical issue. There is a limited universe of money and an increasing number of things to do. Can core programs get into a discussion of priorities and decide what's critical and what's not? What happens at Congress and the appropriations committee? That discussion is not happening.

Herb: Guidance need not be prescriptive. When EPA says “no” it doesn't necessarily mean “no.” We found that in all States. There should be some guidance for EPA and States to know how far you can push. In most Regions, there is not a push from the Regional Administrator. Regions sit and wait for the State to come to them.

Comment: It's important for measures to show causation and change over time. Should we tie availability of PPGs for a State's commitment to do “X” in a PPA? There should be a more

conscious link between the PPA and PPG. The disjunction of the two makes it harder to link money to planning.

Guerrero: “This particular area, in my opinion, is so central to the success of environmental protection in the future. What Congress and State legislators get interested in, sometimes isn’t really what merits attention. The real promise of this process is that if it’s used properly, it’s not going to be the tail wagging the dog, it should be ‘the dog.’ This should be the process and umbrella that provides the framework for mutually agreed upon areas that need attention. You can say to your legislators and to Congress, these are the areas that merit attention. That’s the real promise of NEPPS over time.”

Panelists were asked one final question: What one thing do you think can be done in the next year to move the process ahead?

Hart: “Establish clear and specific measures of performance for the success of NEPPS and PPGs.”

Herb: “Publish best practices for States.”

Paddock: “Find a way to make NEPPS relevant to program managers for priority-setting.”

Gormley: “Develop good surrogates for authentic impact measures.”

F. Luncheon Keynote Remarks by Virginia Wetherell

Virginia Wetherell of Image API, Inc., and former commissioner of the Florida Department of Environmental Protection, delivered the luncheon keynote speech on how Florida shifted to a performance-based management system that allowed flexibility in resource allocation and greater partnership with EPA.

“For years, we operated on gut feelings and tradition,” Wetherell said. Enforcement activities were down because Florida inspectors were not finding the same problems, but the public perceived that DEP was not serious about enforcing the law, she said.

Under Wetherell’s leadership, Florida developed a four-tiered measurement system that is reported to the public in the Secretary’s Quarterly Performance Report. The system includes a good-watch-focus designation that focuses the secretary’s attention on programs whose measures show a cause for concern. Initially, staff viewed the system as a punitive attack on their performance. Now that it has been institutionalized and remains in place under new Secretary David Struhs, staff are seeing the value and intent of the system, she said.

Florida is now using the system to negotiate a joint compliance and enforcement plan with EPA Region 4. The plan is meant to identify priorities, activities and performance measures, and to replace the single-media workplans.

As advice to others seeking to learn from Florida’s approach, Ms. Wetherell identified several pitfalls and potholes that could have been avoided during Florida’s development of the performance measurement system. They included:

- Make sure program managers are rewarded for good performance, and for improving performance after a problem has been identified.
- Document the agency's plans for improvement and educate the press on how the agency is working to solve identified problems.
- Have good data to justify any shift to new or different compliance tools.
- Give yourself enough time to develop a measurement system. It took Florida four years to develop a usable system. The greatest cost is not in new hardware or software, but in the time needed to set up systems to share existing data.
- Develop measures that actually show some change over time.
- Issue reports no more or less frequently than quarterly. A three-month time frame allows you to reward staff and reinforce behavior quickly, while also allowing you to track seasonal variations in data.
- Tailor your system for your own State.
- Start small. This is a dynamic process that will continue to change over time.

III. Issue 1: How Should NEPPS Change the Status Quo?

A. Panel Discussion

Christophe Tulou of Christophe Tulou & Associates moderated a panel discussion on changing the State-EPA culture to one of partnership. Tulou said culture represents the aspirations, experiences, fears and concerns of each individual in a community. He posed a series of questions for the participants: "What's wrong with the existing culture? Is it getting us where we want to go? Is there evidence that some change in culture is needed? Is it necessary in order to accomplish the goals and aspirations of NEPPS? What needs to change and how? Are we advocating change for NEPPS' sake or for environmental results? For our benefit or for EPA and the States?"

Roger Kanerva of Illinois EPA said his State was placing special emphasis on "partnership realization" in its FY2000 PPA. Illinois and EPA Region 5 had agreed to try some flexibility pilots to push thinking outside traditional barriers and to promote change. The pilots involve: 1) integrating quality management plan requirements with NEPPS; 2) reducing Regional review of proposed Title V permits; 3) integrating the Lake Michigan lakewide area management plan with total maximum daily load requirements; 4) delegating some of the State's stormwater permitting authority to counties; 5) reducing inspections of RCRA large quantity generators by 24 percent and shifting resources to more RCRA-C compliance assurance and assistance; and 6) performing Illinois EPA self-audits of RCRA enforcement files instead of federal reviews.

Leslie McGeorge of New Jersey Department of Environmental Protection described how her State was working to link program workplans to NEPPS through better indicators, improved data collection and assessment, and a new implementation and accountability system. Among the challenges they face is a recognition that change requires a long journey, and the new systems are still considered additional work that is not part of running the base program. There's a need to better use indicators and align planning systems with the budget process. There's also a question whether the system will sustain itself after a change in administration, she said. She also issued a challenge to EPA to be more consistent in Headquarters' implementation of NEPPS principles for flexibility, outcome-based management and burden reduction. She called on EPA to improve its goal-based orientation and engage in more work-sharing with the States. EPA also needs to

enhance cooperation across federal agencies, she said. "Overall, NEPPS has led to positive changes. The principles are sound. The only limitations are in the implementation," McGeorge said.

Todd Biewen of the Minnesota Pollution Control Agency described how MPCA had reorganized into a multi-media and geographically based agency. The agency wants to be data-driven, continually assessing the state of the environment and the desires of stakeholders, he said. Neither performance measurement nor performance management will happen by accident; cultural and behavioral changes are needed to make it happen agency-wide. Biewen offered four changes that should accompany NEPPS implementation: improved measurement, better information management, better planning and a focus on environmental results. There are many cultural and behavioral barriers to change. To overcome these barriers, Biewen recommended the following action steps: 1) general training for supervisors, managers and executives on why performance measurement and management is valuable; 2) specific training for program staff focused on their programs, what objectives they are working toward, and how they will measure progress; 3) evaluate yourself often, at least quarterly, and make people accountable for data collection and analysis; 4) issue public reports to boards and the governor; and 5) engage decision-makers in deciding what the data is telling you and what should be done.

Kerry Clough of EPA Region 8 offered six examples of how NEPPS has led to real culture change in EPA. They included: 1) States and tribes can participate in PPAs and PPGs to whatever degree they choose; 2) States have gained some flexibility in directing funds to high priority projects; 3) EPA has done some joint priority-setting with State environment and agriculture departments; 4) Regions have reorganized and staffed themselves around the concepts of partnership and NEPPS; 5) EPA is building partnerships with local governments in Utah that wouldn't have been possible without the PPG; and 6) the PPG regulations were developed with input of EPA Headquarters, Regions, several States and some tribes. He acknowledged that oversight has not been reduced much and that joint evaluations at the end of the year are not thorough enough. He also said EPA could have done a better job of explaining what was wrong with the old system, and that GPRA stopped some of the progress toward partnership while its requirements were being sorted out. Clough suggested the following steps to improve progress under NEPPS: 1) Stop real-time oversight unless EPA finds a problem in a State; 2) EPA Headquarters should think before it creates new initiatives because it prevents Regions from building partnerships; and 3) quit fretting. "NEPPS is working pretty well. Keep it focused and flexible. Don't make it mandatory," he said.

Denise Decker of the U.S. Department of Agriculture described how USDA's Natural Resource Conservation Service had changed its culture in the early 1990s. She noted that change is temporary change until it is institutionalized in the normal organizational structure and becomes part of the accountability system. She recommended the use of goals and benchmarks, facilitated teams and customer and employee feedback to track change. It's important to help employees be part of the change, empowering them to think outside their traditional boxes, she said.

Lisa Lund, EPA Deputy Associate Administrator for Policy, Economics and Innovations, noted a striking change in dialogue since the State Capacity Task Force first began debating State and EPA roles in environmental protection. She also said it's important to understand some important elements of EPA's internal culture. EPA employees are devoted to the agency's mission. They care about the environment and want to improve it. Sometimes, they equate "flexibility" with "rollback." EPA didn't do a great job explaining to its own staff what was meant by flexibility for States or industry. Second, EPA has lots of subcultures, including Regional differences and

differences between Headquarters and Regions and even within Headquarters. There are few opportunities to take a cross-agency look at an issue. Third, EPA is made of scientists, engineers, lawyers and some generalists who come from different academic disciplines and don't understand each other. Fourth, EPA tends to move slowly due to its fear of doing something wrong. Fifth, EPA is risk averse. Staff are not empowered to make decisions that may pose risks. Sixth, EPA's stovepipe structure makes it hard to get a bigger picture that spans the individual work units within the agency. She described several culture change successes documented under Project XL. These successes include more flexible regulations, facility-wide or consolidated permits, streamlined reporting and better understanding of stakeholder needs. She also said it's important to define success and identify short-term successes that can build enthusiasm for longer-term goals. "Change isn't bad when you put the idea forward," she said. "It's when it's forced on you that you have to defend against it. Change is easier to understand when it's seen as beneficial. We need to define what the change will look like and why it's a good thing."

During discussion, the following questions and issues were raised:

Q: Is there a central group in EPA coordinating performance measurement, management and reporting or is EPA relying on a group of people who have other jobs? How do you keep a central group connected to programs? How do you police a program-based group and ensure you get the truth?

Lund: You need a team with strong leadership.

Comment: The civil service foundation within EPA creates no incentive to change. It is a source of resistance.

Lund: That's not the problem, in and of itself. The problem is longevity within programs, people not moving around and not required to perform.

Decker: People change and participate because they're committed to the change, not because they feel threatened.

Tulou summarized the discussion by identifying the following problems:

- Change can be very slow.
- NEPPS and performance management are seen as additional work, layered on top of what has been important in years past.
- Nobody has explained adequately why the culture has to change. Why NEPPS?
- Subcultures within large and complex agencies mean few people can see the entire picture. That makes it hard to convince people of the wisdom of change.

Tulou also proposed the following possible solutions:

- Just try it. It's OK to try something different and take a risk.
- Use quarterly performance reports to show accountability associated with results.
- Endorse change as a reality. Be prepared to deal with change under any circumstances.
- Empower people to be involved in change.
- We all share a basic interest in helping the environment. Build on that common interest and create incentives for endorsing a culture change.

After the plenary discussion, participants were divided into four facilitated breakout groups. The breakout sessions provided an opportunity for smaller groups to identify the highest priority challenges or barriers to culture change, and strategies for addressing them. During the breakout sessions, participants were asked to answer the following questions:

- Which 2-3 specific challenges/barriers in this issue area are the most critical to address?
- What specific steps should be taken to address each, either over the next year or as part of a longer-term agenda? (Actions might include learning from and building on successful activities to date.)
- Who wants to be involved, who will be the champion, who will report back?

B. Breakout Sessions – Issues and Solutions Identified

The following issues and potential solutions were reported back to the plenary session from the breakout groups:

Group I

Barbara D'Angelo of Region 3 reported that this group identified two major challenges: 1) organizational issues and 2) lack of clarity on oversight. Organizational issues, such as EPA's single-media structure and GPRA infrastructure, are a significant challenge. There is no buy-in for NEPPS implementation and a lack of momentum.

Organizational Issues

Possible short-term actions:

- Look at what we can change and begin doing it (look at our span of control).
- Turn NEPPS principles into an active, formal EPA policy.
- Ensure consistent application of GPRA across Regions.
- Create a better connection between PPAs and PPGs.
- Document best practices.
- Identify a "stable of champions" for NEPPS, not just in Headquarters but Regions and States, as well.
- State champions should promote NEPPS within States, develop a communications strategy.
- Link NEPPS to environmental work.

Possible long-term actions:

- Create a NEPPS advocacy office at EPA Headquarters.
- Create incentives for employees to follow NEPPS principles.
- Develop new GPRA goals from the bottom up.
- Rewrite EPA policy and guidance to reflect a NEPPS paradigm.
- Improve communication.

Oversight Clarity

Possible short-term actions:

- Guidance for next year on oversight.

Possible long-term actions:

- Consistent approach to oversight across Regions.

Group II

Leslie McGeorge reported that this group looked at traditional EPA and State roles (top-down, activities focus, media-specific, grant-driven) and decided that a key to culture change would be developing a joint planning process that considers State and national priorities together. The process would include joint, outcome-based reviews and States involved in setting national goals.

The group identified the following impediments to that goal:

- PPAs are not specific enough to be meaningful and valuable to staff and managers.
- National program managers need to move away from the stove-pipe approach and focus on outcomes.
- NEPPS is competing with ancillary agreements such as memoranda of agreement and delegation agreements. Those agreements need to be “NEPPSized” or folded into one planning process.
- There is no mandate to do NEPPS or outcome-based management.
- Staff don’t understand NEPPS. We need additional training, outreach and practices.
- Management sends inconsistent messages. States and EPA need to recommit to NEPPS, perhaps with some amendments and fine-tuning to add clear benefits that have accrued.
- We need messages and strategies to promote NEPPS during any change in EPA administrator.
- Need to better define roles and responsibilities.

Group III

Bernard Penner of Maryland reported that this group identified four barriers:

- 1) Unclear ownership of the process.
- 2) Failure to communicate the need for change.
- 3) Lack of leadership.
- 4) Lack of communication, motivation and education on how system will lead to a better environment.

This group proposed the following actions and solutions:

- Leader States should demonstrate the way to accountability, letting other States and Regions learn from their example.
- Reconcile the disconnect between traditional beans and new performance measures by trying some pilots to use data in better ways.
- EPA and States need to come up with concrete rewards for participating in NEPPS.
- Send a clear directive from top management showing a commitment to NEPPS. Formalize a communication path from leadership to keep NEPPS moving forward.
- Link innovation to employee performance appraisals.
- EPA and States need to implement an “environmental management system” to build the infrastructure for performance-based management and make it work.

Group IV

Bob Zimmerman of Delaware reported that this group had identified the following barriers and problems:

- A lack of clarity of what we are accountable for (process or performance) and to whom (public or EPA).
- The need for better measures of environmental and program progress. Missing linkages between measures we’re using and problems we’re trying to address.
- Lack of recognition that NEPPS exists and lack of knowledge of why it’s needed.
- Lack of champions.
- Lack of model for differential oversight.

Possible solutions:

- Clarify the meaning of accountability and develop measures for it. (Process vs. performance; program audits, Headquarters visit States to understand field level)

- Focus on leadership and communication. Recommit to NEPPS and integrate it into agencies.

Facilitator John Lingelbach recruited a small group of volunteers to work after hours and develop a manageable short-term action plan and long-term list of issues that need to be addressed. This so-called “evening workgroup” was assigned to review the results of the breakout group discussions and report back during the final plenary session.

IV. Issue 2: Using Environmental Information for Decision-Making

A. Panel Discussion

Moderator Gerard Bulanowski of Region 8 emphasized that environmental information is the cornerstone of performance-based management. He pointed out that the GAO audit found an absence of baseline data was a problem in managing for environmental results. Researchers under contract to the National Academy of Public Administration noted that more, not less, data is needed. EPA and States need to focus on what information is critical, streamline reporting and find funding to improve information systems. To change to a performance-based culture, we must have more and better data, he said.

Chris Simmers of New Hampshire emphasized the importance of identifying what program managers want and need to know. The New England Goals and Indicators Project is a good model for identifying useful sets of measures, designing measurement systems and forming a positive State-EPA relationship, he said. New Hampshire believes in starting at the local level with measures that mean something to local decision-makers. We should think of measures as a “nested set” and not a hierarchy, he said. “You don’t always have to be at the top of the hierarchy to get started,” Simmers said. New Hampshire also is creating a quarterly reporting system through which senior leaders can look at progress, identify priorities and problems, and allocate resources. “Good measures plus ongoing tracking plus regular reporting plus demonstrated use equals measures nirvana,” Simmers said.

Carol Andress of the Environmental Defense Fund urged participants to share information with the public and empower them to participate in environmental protection. She offered five principles that EPA and States should keep in mind when developing information-based systems:

- 1) More is Better: more information to more players, using the Internet. Don’t limit access to data just because the data has limits. A spotlight on the data yields improvements.
- 2) Tangible Measures of the State of the Environment: Avoid acronyms. Don’t provide information in terms of regulations, NEPPS or programs. Talk in terms the public is interested in: Is the water safe? Is the air clean? Is it getting better or worse?
- 3) Integrate, Integrate, Integrate: Bring disparate pieces together into a holistic framework with patterns people can see and understand.
- 4) Give Us the Limits: Environmentalists recognize there are limits to the science. Tell us what they are.
- 5) Involve the Public in Plans: We need a richer involvement in the planning process. Don’t avoid involving the public because you think they won’t understand.

James Conrad of the Chemical Manufacturers Association urged participants to focus on measures of what’s happening in the environment. “Shift money to toxics research to see what people are

actually exposed to, rather than assuming. Be rigorous about the key things we need to measure and build from there,” he said. He referenced the rewrite of EPA’s strategic plan by House majority staff, focusing on ambient outcomes. Data may need to come from sources outside EPA, such as the Centers for Disease Control, U.S. Fish & Wildlife Service, State pesticide data, etc. At some point, EPA needs to make statements about the nation’s environment and what States need to do to meet EPA goals, he said. He also noted that the enthusiasm of the regulated community for environmental measures will collapse if they are expected to pay for ambient data collection. “Point sources are not the main source of pollution,” he said. “Ambient monitoring needs to be done by government or other neutral parties.” He also urged participants to reduce and simplify the number of performance measures, and to have measures that satisfy all planning processes.

Mary McCaffery of EPA’s One Stop Program emphasized the importance of making information understandable, accessible and timely. States and EPA are data trading partners in a new environmental information economy, she said. They need to develop consensus on a common language, ways to use the World Wide Web and ways to transact data. The One Stop Program is helping 30 States integrate data around facilities and sites so it can be used for decision-making and public access. The next stage is linking data to performance management systems that identify trends and track progress across data sources. She urged participants to relate to the people doing IT planning in their organizations.

Mark Badalamente of EPA’s new Office of Environmental Information emphasized integrating environmental information, building partnerships with States and getting information to the public. The new office seeks to bring together technical and policy experts so EPA can support better environmental decision-making, including reporting on environmental results. He described the office’s structure and its heightened focus on data and information quality. Its goals are to promote environmental data quality, reduce the burden of collecting and reporting, advance the integration of information systems, coordinate how data is collected and submitted and improve public access to information. The office plans to partner with States and tribes to build on data standards, business practices and other work already underway.

During discussion, the following issues and questions were raised:

Q: What is the information office doing to get the Office of Enforcement and Compliance Assurance (OECA) to play?

Badalamente: OECA is represented on the Quality and Information Council. The office has worked to establish a strong partnership with OECA.

Q: Where is the responsibility to pull together and integrate information from core performance measures?

Badalamente: OEI will be the lead, with involvement from OECA and the Office of the Chief Financial Officer.

Q: Who’s going to open the national databases and clean them out?

McCaffery: Data needs will constantly change. Know what your data needs are in your State and bring ideas for simplifying through the NEPPS process.

Following the question-and-answer period, participants were again divided into four breakout sessions to address the same questions as the previous day:

- Which 2-3 specific challenges/barriers in this issue area are the most critical to address?

- What specific steps should be taken to address each, either over the next year or as part of a longer-term agenda? (Actions might include learning from and building on successful activities to date.)
- Who wants to be involved, who will be the champion, who will report back?

Breakout groups also considered a Florida proposal to support the development of State-based measurement systems through EPA's One Stop program. Using a \$50,000 grant from the One Stop program, Florida planned to hold two environmental performance measurement and management meetings. The meetings would be designed to develop a best management practice guide on performance measurement and management, and to build a network of experts to help States and EPA implement outcome-based measurement and management systems. The One Stop program and the ECOS/EPA Technical Transfer committee would share coordination of the work.

B. Breakout Sessions – Issues and Solutions Identified

Group I

Jennifer Yocum of Oregon reported that this group identified the following challenges: 1) the lag time between cause and effect in the environment; 2) changing needs, definition of data and lack of a baseline; 3) lack of integration and ability to relate data to performance measures; 4) fear of GPRA dominance; 5) limits on resources for data activities; 6) data ownership issues and 7) impacts on results that are outside government's control.

The group also identified the following opportunities: 1) more efficient data collection will eliminate redundancies; 2) opportunity to "clean the closet" of unneeded data; 3) integration across media; 4) better information and more information-based decision-making; 5) new delivery technologies; 6) performance-based budgeting; and 7) the ability to build public understanding and support for what we do.

The group identified the following short-term actions:

- Decide on Strategic Approach: Do we focus on good measures with weak data or settle for bad measures with complete data? Does data drive the measures or vice versa?
- Sort out leadership with respect to various accountability systems: Who's responsible at national and State levels? Where is the forum to discuss issues?
- Inventory and evaluate current data in each organization.
- Compile best management practices or examples of what agencies are already doing.
- Get States more involved in the GPRA planning cycle.
- Commit to using geographic information systems (GIS) to pull data together and tell a story.
- Use One Stop as a vehicle to promote GIS

The group also identified the following long-term actions:

- Work toward a seamless set of NEPPS and GPRA measures (identify the disconnects and complements in the data; sort out what's necessary and what's not necessary)
- Develop a map to good measurement and data (discipline, resources and joint message on part of EPA and the States to support this direction)

Group II

Paul Schmiechen of Minnesota reported that this group identified the following barriers and challenges: 1) Goals: need for starting point related to goals; 2) Collection: guaranteeing data quality; 3) Use: managers frequently don't use data they've got now; and 4) Dissemination: making it available to the public.

The group offered the following solutions:

- EPA and States should develop a collaborative learning model/guidebook on measures, as described in the Florida proposal.
- Work with experts to find data and measures that support the existing goal structure.
- The Office of Environmental Information should integrate data and measures to support real needs and goals.
- Make sure key data elements are in alignment.
- Seek public input to get a better sense of what information the public would find useful.
- Better understand NEPPS needs for data and information and how those needs fit into the overall information system.
- EPA should encourage use of innovative indicators by States in PPAs, possibly in lieu of core performance measures.
- Apply existing EPA data gap analysis to the 10 goals.

Group III

Keith Hinman of Ross & Associates reported that this group identified the following problems: 1) Multiple information needs and audiences means one size does not fit all; 2) linkage needed between activities, outcomes and the bigger picture; 3) data collected that is not used; 4) need for alignment among multiple data collection processes.

The group offered the following solutions:

- Examine how industry, the public and other agencies measure performance and use lessons learned.
- Determine how CPMs will be used (National state of environment report? Measure of State performance?)
- Use State/Regional NEPPS process to identify information priorities linked to management priorities
- Support best practices dissemination (Florida proposal)
- Develop a straw proposal to measure compliance assistance effectiveness (near-term)
- Analyze alignment among data collection processes (CPMs, associated reporting requirements, GPRA, national databases, CEIS' 10 questions, etc.)

Group IV

Kevin Pearson of Arkansas and Len Pardee of Region 6 reported that this group identified the following barriers: 1) lack of national leadership among States and EPA; 2) failure to keep up with internal and external customer needs; 3) environmental progress is hard to measure; and 4) data accessibility and quality.

The group identified the following possible solutions:

- Develop a consistent vision that includes data partners, data managers and stakeholders. Clarify roles and expectations.
- Develop good performance measures.
- Conduct an overall needs assessment of customers and NEPPS practitioners.
- Inventory data hardware and software to ensure consistency and compatibility.

- Invest in communication and knowledge transfer.
- Create a data user feedback loop.

During discussion, Darryl Boudreau of Florida elaborated on his proposal to create an information collaborative between States and EPA. He said the proposal would merge some existing work of the Green Mountain Institute with EPA's One Stop Program to build an information database highlighting leaders in performance measurement and management. The proposal would create a road map that would allow States to avoid some problems in setting up performance-based measurement systems, and to be prepared for unavoidable obstacles. The project might include a guidebook on performance measurement and management and a general meeting for interested States. The goal would be to shift from traditional activity-based management to outcome-based performance management.

Lingelbach recruited a second "evening workgroup" to work after hours and develop a manageable short-term action plan for information management and long-term list of issues that need to be addressed. They were assigned to report back during the final plenary session on their recommendations.

V. Issue 3: Joint State/EPA Planning

A. Panel Discussion

Katrina Kipp of EPA New England (Region 1) described a vision of joint planning that included identifying environmental problems, setting priorities, allocating State and EPA resources, deciding on joint or separate approaches, and working together to achieve goals. Joint planning requires targeting limited resources, working together and allowing flexibility in administering base programs. It also requires trust and working collaboratively. While EPA New England has had some success with its States, it still has a long way to go, she said. While States are planning more strategically and looking across media, EPA has been less successful in setting joint priorities with States. A key part of allocating resources and setting priorities is committing EPA resources to help, she said, citing an example of how the Region is supporting Rhode Island's goals and objectives.

Tom Hansen of EPA Region 4 said the Florida PPA process had been a success based on several factors: 1) Florida Secretary Virginia Wetherell and Regional Administrator John Hankinson had a vision, and the fortitude to back up the vision with resources; 2) project leaders Darryl Boudreau and Tom Hansen work outside the media programs and can influence progress by thinking outside the box; 3) great support for risk-taking and innovation; 4) using information gathered to make decisions about resources; 5) positive shifts in how we conduct business; and 6) greater trust and respect through working together and consultation. A recent challenge, however, has been the addition of new leadership in Florida and questions on the process's future direction.

Boudreau said the only limitations at this point are traditional program expectations. "Culture change is critical," he said. "There has to be a strong, clear signal from all directions." Florida began by developing a measurement system. Now, the State is working to change the management culture through four environmental problem-solving projects involving the State, EPA and stakeholders. Florida also is developing a joint compliance and enforcement plan with Region 4 to identify Florida's priorities and the best approach to address each of them.

Jon Sandoval of Idaho emphasized the need to move from crisis management and knee-jerk reactions to a joint planning system with predictability, certainty and accountability. Both Idaho and EPA have an environmental vision based on the values and interests of the citizens of the State, he said. Their goals should provide guidance to agencies, industry and others who deal with environmental issues in Idaho. Idaho envisions a process that includes 1-year program plans, 5-year PPAs and agency-wide strategic plan, and a long-term, 25-year environmental management vision. Idaho is also moving to monthly reporting of performance measures based on program elements and per-unit costs for agency activities.

Barbara D'Angelo of Region 3 described the high expectations surrounding the first PPA between Delaware and Region 3. Unfortunately, she said, they got hung up on the administrative trivia of the PPG and were unable to get back to their original vision of a collaborative joint-planning relationship. "We need to learn how to work together. We're accustomed to working in media stove pipes with very little communication," she said. Region 3 hopes to develop mutual priorities with the States based on environmental needs.

Gerry Levy, deputy director of EPA New England's enforcement office, described several elements of effective joint enforcement planning: 1) the quality of the State-EPA relationship, which requires an up-front investment in honest dialogue and time; 2) recognizing that effective planning is iterative and you should learn as you go; 3) effective communication happens early and often and at both senior management and working levels; 4) clear expectations, including streamlined guidance and a goal of no surprises; and 5) mutual accountability, including a compliance strategy attached to the PPA and an end-of-year report.

Helen Waldorf of Massachusetts offered three keys to improving EPA/State planning: 1) recognize we are allies, not adversaries; 2) simplify, simplify, simplify; and 3) consensus (a.k.a. everybody can't have everything). Allies, she said, share information and do not always agree. Because they share information about planned activities, allies can work out differences and avoid confusion and conflict. To illustrate the need to simplify, Ms. Waldorf showed examples of how Massachusetts and EPA New England had reduced the State's PPA compliance strategy from 39 lines and 12 columns of information in FY 1998 to 14 lines of data in FY 2000. Consensus, she said, involves a problem-solving attitude and a recognition that "I get some, you get some, and nobody gets everything."

During discussion, the following issues and questions were raised:

Q: In order to enhance the relationship with a Region, do you need more resources for a performance management system?

Boudreau: Florida created an office to coordinate strategic planning. It had no Region 4 financial support.

Kipp: EPA New England directed its State units to put EPA resources on the table during PPA negotiations.

Hansen: Joint planning a high priority. Senior managers meet individually with all the States.

Q: Why do some States still do traditional workplans and a PPA and an MOA? Doesn't this run counter to the overall approach?

Hansen: Region 4 is flexible as to what equals a PPA. It depends on each State's decision.

Boudreau: The PPA will become the lone agreement, but not until we're ready with measures and a process.

Q: Does Florida make no program commitments at all in its PPA? What are the commitments in the plan?

Boudreau: The PPA is not for the sake of the activities. We evaluate performance based on the outcomes achieved.

Hansen: Commitments are negotiated based on environmental problems. For example, we agreed to cut back inspections of NPDES majors by 20 percent to put a greater focus on minors.

Comment: You should consider cost accounting, to create a direct relationship between the planning process and the budgeting process.

Katrina Kipp identified the following common themes that lead to better joint planning: 1) good relationships and trust; 2) collaboration; 3) communication; and 4) flexibility to focus on State-specific and local problems.

B. Breakout Sessions – Issues and Solutions Identified

Group I

Jennifer Yocum of Oregon reported the following challenges identified by this group: 1) Why do joint planning? What are the benefits? 2) Shifts during planning, new priorities after signing and frequent new initiatives; 3) EPA and States have fundamentally different perspectives; 4) Little common understanding of what a joint process is: EPA as senior partner, failure to learn from the past, and lack of follow-through during the year; 5) Lack of flexibility in shifting funds; and 6) Inadequate State involvement in Regional and national planning.

The group offered the following solutions:

- 1) Reconcile calendars and guidance issuance.
- 2) Reduce the number of governing agreements (i.e., MOUs, MOAs, etc.).
- 3) Develop a NEPPS best practices clearinghouse of information on flexibility, success stories, multi-media funding or work-sharing.
- 4) Create a NEPPS advocate for appeals of EPA decisions.
- 5) Designate multi-media money.
- 6) Look at work-sharing through inter-personnel agreements and other approaches.
- 7) Create peer or joint-auditing processes.
- 8) Set priorities based on outcomes, not activities.
- 9) Provide early input for States to feed their priorities into national priorities.

Group II

Steve Burkett of Region 8 reported the following barriers identified by this group: 1) overcoming the status quo; 2) planning seen as detracting from “real work;” 3) conflicts between Headquarters and MOA process; 4) inconsistent messages on NEPPS flexibility; 5) EPA’s media-based implementation of GPRA doesn’t encourage joint planning with States; 6) too many initiatives; 7) the media-specific structure challenges or conflicts with a multi-media emphasis; and 8) lack of meaningful Regional participation in development of national guidances.

This group identified the following possible solutions:

Long Term:

- Change GPRA structure to reflect sensitivity to NEPPS.
- Multi-year planning (2-3 year cycle) would encourage investment in the planning effort.

Mid Term:

- Change the MOA structure and process to be more sensitive to NEPPS.
- Place a limitation on initiatives; re-examine the process and criteria for initiatives.

Short Term:

- More Regional and State participation in national guidance development.
- More formal senior-level communication between States and Regional offices.
- Visible EPA senior management support for flexibility and other NEPPS planning.

Group III

Brian Ianni of New Jersey reported that this group identified the following barriers: 1) limited participation by Regions in national program priority-setting; 2) limited flexibility on how to divert from national priorities; depends on who you interact with; 3) many ruling documents that drive us forward (i.e., PPA, delegation agreements, sidebar agreements); 4) the culture, personalities and relationships between Headquarters, Regions and States.

This group identified the following possible solutions:

- Short-term integrated planning pilots (such as Illinois flexibility pilots).
- Revisit delegation agreements and MOAs.
- Work within NPM guidance to encourage Regional planning innovations.
- Improve communication between GPRA and NEPPS staff.
- Improve trust and communication between States and Regions through face-to-face meetings.

Group IV

Jacqueline Rose of EPA's Office of Regional Operations reported that this group identified the following challenges: 1) different responsibilities, objectives, structure and scale of planning and problem-solving processes at EPA, State and congressional levels; 2) leadership is inconsistent in its messages, implementation, priorities and policies; 3) timing; 4) attitudes of all players lack flexibility, openness, trust and consensus approach.

This group identified the following possible solutions:

- Develop an attitude of trust and foster consensus skills, such as give-and-take in priority setting and joint partnerships.
- Adjust timing in planning cycles.
- Address problem areas of conflicting objectives: create a mechanism to deal with them and develop the ability to discuss, make distinctions and resolve.
- Identify differences requiring mediation or reconciliation.
- Reconcile problems.

Lingelbach recruited a third group of volunteers to work after hours and develop a manageable short-term action plan for joint planning and long-term list of issues that need to be addressed. They were asked to report back to the workshop during the final plenary session.

VI. Concurrent Mini-Workshops

On the workshop's third day, participants split up into four informal "mini workshops" on the following topics: Performance Partnership Grants, public participation, burden reduction and GPRA/CPMs. These sessions were designed to share successes, provide information and transfer knowledge and techniques for NEPPS implementation.

A. Burden Reduction

Adolph Everett of Region 2 reported that the burden reduction session discussed the tie between data collection and data use and reviewed key points of the Peter Robertson memo on the cost-value approach to reducing burden. Arkansas, Region 6 and Washington provided examples of burden reduction projects. The group also discussed the use of the WISER web site as a resource for information-sharing on burden reduction. Everett cited a need to publicize burden reduction successes to the agency as a whole.

B. PPGs

Scott McMoran of EPA provided an update on the Part 35 regulations that govern Performance Partnership Grants. Scott said the comment period on the proposed rule had closed in September 1999. EPA received very few comments on the State subpart of the rule. The agency was targeting resolving all comments and publishing the rule in late spring to early summer.

The second part of the session included a panel discussion by State staff from Nebraska and Louisiana and EPA staff from Regions 4 and 7. The panel described their experiences with negotiating and administering the Performance Partnership Grants and what they considered to be the benefits of the funding mechanism, problems encountered in using them, and how they resolved these problems. The general thread coming through discussion was that, oftentimes, barriers to effectively using the performance partnership funding mechanism are self-created.

C. Public Participation

Staff from the Maryland departments of environment and natural resources convened a mini-workshop on public participation in the NEPPS process. During the workshop, participants developed an inventory of resources, including model processes, innovative ideas, tools that states and regions could use, and contact persons that could serve as points of reference for information. Maryland and EPA Region III staff described Maryland's recent NEPPS public participation efforts regarding public review of Maryland's 1997 and 1999 *Environmental Indicators Status Reports*.

Representatives from approximately 10 states participated in a round-table discussion of the following:

- current State NEPPS public participation efforts,
- barriers to successful public participation efforts,
- opportunities for public participation in the NEPPS process, and
- innovative approaches to engaging the public in discussions of a State's environmental goals and priorities (effecting a cultural change).

Participants identified the following barriers to successful NEPPS outreach:

- lack of public interest in NEPPS and NEPPS process,
- difficulty in attracting public to participate in non-controversial environmental discussions or meetings,
- confidence in the input and "representativeness" of the participants, and

- engaging participants in the topic of your choosing versus their issue du jour.

Participants identified the following successful NEPPS outreach tools and public participation mechanisms:

- public meetings,
- environmental fairs,
- annual public surveys on key issues and behaviors,
- presentations to major stakeholders and key organizations (e.g., Municipal Leagues, League of Women Voters, Civic Associations),
- briefings for key legislators and other elected officials,
- community-based presentations on issues that concern them,
- issue-related outreach (e.g., TMDL briefings around the state),
- finding local level champions,
- personal contacts with key community, business, and academic leaders,
- evening forums,
- using loaned-EPA executives (i.e., IGPs), and
- recruiting retired professionals to solicit input and convey information.

D. GPRA and CPMs

The mini-workshop on GPRA and NEPPS focused on the relationship between Core Performance Measures (CPMs) and Annual Performance Measures (APMs), and on ways that the EPA strategic planning process might conflict with NEPPS. Participants agreed that EPA should provide information that demonstrates, for each NPM, how CPMs and APMs essentially are not in conflict because they share common data elements. Participants also discussed the possibility that a true source of conflict between NEPPS and GPRA is the setting of "targets" for goals and measures rather than the goals and measures themselves. At the conclusion of the mini-workshop, OCIR committed to explore, with assistance from State and Regional participants, how the Agency's strategic planning process could be modified to accommodate State and Regional input.

VII. Concluding Plenary Session

Lingelbach opened the final plenary session by describing the process that would follow the workshop:

- The planning committee would develop an action plan based on the reports from the evening workgroups.
- This draft plan would be distributed to participants within a couple of weeks and circulated within ECOS and EPA leadership.
- The goal of the final plenary session is not to develop final agreement or consensus, but to offer comments to assist the planning committee.
- Some recommendations are already proceeding or can proceed without further review.
- Others will need senior-level attention and debate in the weeks to come.

A. Reports from Issue Workgroups

1. Using Environmental Information for Decision-Making

The environmental information issue workgroup included Chris Simmers of New Hampshire, Stephen Nelson of Massachusetts, Jennifer Yocum of Oregon, Len Pardee of Region 6, Eric Burman of OSWER and Jim Bazemore and Keith Hinman of Ross & Associates. It offered three short-term recommendations to be addressed in the next 6-12 months, and asked that long-term recommendations arising out of breakout sessions also be recorded in the meeting summary.

Short-Term Recommendations	Suggested responsibility
1. Endorse efforts to develop a Best Management Practices manual for performance measurement systems; include benchmarking of lessons learned in previous efforts from States and industry. (The workgroup's knowledge transfer team was to meet in Baltimore on Dec. 3 to move forward on this initiative.)	ECOS/EPA Information Management Workgroup (but only one owner please).
2. Assess current alignment of national performance measures (CPMs/GPRA/NPMS/10 data gap questions identified by CEIS, etc.) and recommend next steps for pursuing alignment. The group's long-term goal is one set of measures.	EPA Information Office in conjunction with ECOS (but only one owner please).
3. Inventory existing work at the State, federal and local levels to address the question of what information users (environmental managers, general public, academics, etc.) want to know.	EPA Information Office in conjunction with ECOS (but only one owner please).

During discussion led by Chris Simmers, workgroup members addressed or considered the following issues:

Q: What does "endorse" mean in recommendation #1?

A: EPA and ECOS would provide adequate funding for the initiative, and create a central coordinating function (one owner) to oversee it.

Q: Could recommendation #3 be seen as the first phase of recommendation #1, thus linking them together?

A: Yes

Comment: Under recommendation #2, existing ECOS committees and national program managers could pilot a slice of the measures alignment assessment, i.e. review all air or water measures as a single-media pilot project to see what we learn. This might be something ECOS could consider at its spring meeting in Philadelphia.

Comment: The Information Office may not be the best EPA lead office for the measures alignment assessment. OCIR could be the lead if all CPMs are considered, or national program offices for single-media pilots.

Comment: The inventory described in recommendation #3 might look at state of environment reports in the States (such as Indiana and Illinois) to see how they were received, what people are saying about them, and what we can learn from those experiences.

2. Joint Planning

The joint planning issue workgroup included Bryan Ianni of New Jersey, Mike Hadrick of EPA's Air office, Katrina Kipp of Region 1, Bob Goetzl of Region 1, Madeline Snow of Massachusetts, and Delleane McKenzie of EPA OCFO. They identified barriers and challenges in four areas (Leadership, Attitude/Culture, Differences and Documents/Processes/Initiatives), along with short-term actions to address each. *Action steps that should be taken in the near short term are marked by an [x].*

A. Leadership	
<p>Barriers/Challenges:</p> <ul style="list-style-type: none"> • "Joint Planning" can mean many things; • inconsistent messages and priorities; • lack of clear roles, priorities, guidance, etc. at EPA Headquarters, Regions and States; • lack of education, outreach and training 	<p>Short-term Actions:</p> <ol style="list-style-type: none"> 1. Recommit EPA and State leadership 2. Write "letters of interest" from Headquarters to Regional administrators, Regional administrators to States, States to Regional administrators 3. Establish definitions and boundaries for joint planning and flexibility, and undertake pilots
B. Attitude/Culture	
<p>Barriers/Challenges:</p> <ul style="list-style-type: none"> • Trust, • building relationships, • communication, • lack of recognition and value of different approaches, • planning not valued, • unwillingness to let go of old ways of doing business (e.g. workplans) 	<p>Short-term actions:</p> <ol style="list-style-type: none"> 4. [x] Inter-Personnel Agreements (IPAs) from EPA to States – leverage federal resources to do more in-State work 5. [x] Increased face-to-face meetings 6. [x] EPA Annual Performance Report (APR) should specifically acknowledge and value different approaches to environmental protection (specifically NEPPS) 7. Sharing of experiences – clearinghouse 8. Work commitments from EPA to States to do work that contributes to environmental progress in the State, not just oversight of the State programs

C. Differences	
<p>Barriers/Challenges: Differences in:</p> <ul style="list-style-type: none"> • approaches (multi-media, watershed, etc) • funding cycles/years • guidance cycles/what to agree to and when • Headquarters mandates & priorities, Regional priorities, State priorities • GPRA, NEPPS, etc. • definition of flexibility • comfort and willingness 	<p>Short-term actions</p> <ol style="list-style-type: none"> 9. Align CPMs, GPRA, databases, CEIS 10 questions, ARRs 10. Timing: NPM guidance early 11. Continued flexibility re forward funding 12. Early State/Regional involvement in guidance and priority development 13. Re-examine GPRA (now being done)
D. Documents/Processes/Initiatives	
<p>Barriers/Challenges:</p> <ul style="list-style-type: none"> • Unwillingness to let go of workplans, MOAs, side agreements, delegation agreements (EPA and States). • Too many initiatives 	<p>Short-term actions:</p> <ol style="list-style-type: none"> 14. [x] Find out what Regions require [both] workplans and PPAs and why 15. [x] Revisit delegation agreements 16. Reduce initiatives and align with NEPPS

During discussion led by Bryan Ianni, the following questions and comments were raised:

Comment: EPA guidance and annual priorities are based on the budget, which is developed two years ahead of time. States and Regions should have earlier involvement when the budget is developed in order to impact the annual priorities.

Q: What are the "letters of interest?"

A: 1997 was the last time EPA and States recommitted to NEPPS. The letters would communicate flexibility in meeting multiple priorities at each level of government. They would originate in a letter from Administrator Browner that would be signed by all national program managers, Regional administrators, and State commissioners, and passed on through EPA and State organizations. Over time, the 1997 commitment has lost its punch. The new commitment would re-emphasize the system in general and speak to the value of joint planning to allow for multiple priorities.

Comment: The workgroup saw the MOA/workplan recommendation as a short-term action item that would help reach the long-term goal of making the PPA the ruling document in the State-EPA relationship. These other State-EPA documents should be re-examined to fit them into the NEPPS system.

Comment: Delegation agreements are a really touchy issue and we can't just toss them out. We can "revisit" (i.e., read and see what they say).

Response: Agreed. We can't throw them out or ignore. We can look at what the delegation document tries to get to and focus on, and bring it into the 21st century. Look at the level of detail, recognizing there are many constraints in regulation or statute that require some detail.

It's worthwhile to focus on the extent to which coordination with NEPPS adds value to the State-EPA relationship.

Comment: It's important to make the whole NEPPS process relevant to program managers at the State and federal level and encourage buy-in. Two thoughts: 1) as you look at each action step for NEPPS, ask "How does this increase ownership or buy-in by line managers and program offices?" 2) In the recommitment letter, at the State and federal level, ask each program office: "What level of flexibility they have within core programs to set priorities, and also, what's essential?" This should stimulate thinking in the programs about flexibility.

Comment: Try to encourage engagement in planning by States, locals and tribes in a multi-year time frame. Corrections in annual time frames tend to be marginal. Working in a multi-year perspective deflates the need for animosity and attention at the annual level.

Response: Agreed.

Q: Is the recommendation for face-to-face meetings a return to the old ways of oversight?

A: Face-to-face is necessary to eliminate barriers of the office, explain priorities and challenges and where we should be going.

Comment: Face-to-face meetings within Regional offices is also important to spread the message of NEPPS. For example, Regional State-local liaisons are not necessarily involved in NEPPS. Need to do a better job of coordinating within Regional offices.

Response: True not just in Regions or Headquarters. Engaging program managers is a challenge at State level, too.

Q: Several years ago there was an ECOS-EPA effort to identify barriers to NEPPS. Chuck Kent led this project. It could provide useful background information. What has happened with that?

A: We should find out.

Q: Elaborate on GPRA/CPMs recommendation. Are you suggesting re-examining the GPRA goal structure? Need more specific action. Who? What's going to happen? Why is this a short-term item?

A: We're not sure. It needs to be looked at. The current strategic plan revision is not making significant changes. Tweaking is not where we need to go. We need strategies to overcome inertia. The administrator may listen to States and Regional administrators. Perhaps a joint statement or a statement from ECOS on EPA's GPRA structure and the need for revision to make it NEPPS friendly, to encourage joint planning, to get national program managers working toward a NEPPS-based system.

Comment: Perhaps OCFO and OCIR should look at how NEPPS is affected by GPRA and how it's working.

Q: Why did you recommend finding out who still does both a PPA and a workplan?

A: Several States still do workplans with a NEPPS "cover sheet." We need a better understanding of why that's occurring. The PPA sets goals and objectives. The workplan identifies activities for grants. The original idea was to move away from workplans toward results-based PPAs, We need a better understanding of why you continue to do both.

Comment: This demonstrates a conflict between NEPPS and grant requirements. We need some guidance that tells how to make the PPA satisfy both needs, and distribute it more widely. There are certain elements a PPA has to have in it in order to meet the requirements. Do a survey and look at how you resolve the tension between grant regulations and PPA documents.

Comment: We have a PPA that defines the roles of the State and EPA. It may have more weight than a PPA with more volume. Don't dismiss the notion out of hand. There's a lot of value to it.

Response: We just want a better understanding.

Response: The question is consistency. No one implied that a State shouldn't decide. Find out if Regions are requiring it, and why.

Comment: You have to have a document that requires work, whatever you call it.

Comment: In States with combined environmental agencies (pollution control and natural resources), the non-EPA portions don't have a conflict with their federal counterparts. Look at other federal agencies in relations with States and how they do it differently.

Facilitator's Comment: Lingelbach said two issues seem to come out of this discussion: 1) commitment and 2) coordination. Could possibly flesh out some recommendations and suggestions under those headings.

3. Culture Change

The purpose of the culture change session was:

- To identify changes that should accompany NEPPS implementation.
- To identify successes and cultural barriers to partnerships and performance-based management.
- To begin developing action steps that will remove barriers to change.

The culture change issue workgroup included Barbara D'Angelo of EPA Region 3, Cathy Wagenfer of Maryland, Darryl Boudreau of Florida, Rich Traub of Region 5, Madeline Snow of Massachusetts, Will Bowman of EPA OCIR, Bruce Slater of Utah, and Leslie McGeorge of New Jersey. They developed a set of definitions, barriers to change, and both short-term and long-term solutions, as shown below:

Definitions

Organization Culture – The collective behavior and practices (visible) of the members of the organization emanating from the values and principles (invisible) held individually and shared by the organization.

Organization Culture Change – The collective change in behavior of members of the organization.

Why a Change in Culture? NEPPS envisions an “improved holistic environmental management system” that requires different behavior, different roles and responsibilities, and different accountability for States and EPA. In order to ensure the successful implementation of NEPPS, we need to identify the barriers to change.

Identified Barriers to Change

In order to overcome the barriers to change, EPA and States need to strengthen their leadership, reconfirm their commitment to the principles of NEPPS, and ensure its sustainability by institutionalizing the system. To accomplish this, the Cultural Change champions will develop a recommitment document to be signed by State Commissioners and EPA leadership (including National Program Managers), which contains the following components:

- a policy statement that calls for a single planning system that merges the current delegation process with the planning process identified under the NEPPS system; and
- a strategy for implementing the recommendations contained in the following tables.

Recommendations

Topic/solutions	Time Frames	Responsibility
Communication		
1. EPA should to sponsor NEPPS meetings for the Regional and national program managers to reinforce the importance of NEPPS and share information among States.	Short and Long Term	EPA
2. EPA should better reflect/promote NEPPS on the EPA Web Page.	Short term	EPA
3. EPA should to include NEPPS in the EPA Annual Performance Report.	Short term	EPA
4. EPA, States, and ECOS should send a recommitment memo from Administrator, National Program Managers, Regional Administrators, and the Commissioners (States) with ECOS.	Short term	EPA/ECOS/States
5. EPA and ECOS need to develop a communication strategy and outreach plan.	Long term	EPA/ECOS
Accountability		
6. EPA and ECOS need to identify a new group of NEPPS champions within the States, EPA HQ, and Regions.	Short term	EPA/ECOS
7. EPA and ECOS need to define differential oversight.	Long Term	EPA/ECOS

Topic/solutions	Time Frames	Responsibility
8. EPA and States need to define roles responsibilities of States, EPA, and National Program Managers.	Long Term	EPA/ECOS
9. ECOS should prepare a NEPPS recommitment document for discussion /strategies on the State/EPA relationship at its Spring meeting.	Short Term	ECOS
10. EPA should include NEPPS in EPA management reviews and EPA and States need to include NEPPS in employee performance standards at all levels.	Long Term	EPA/States
Measurement		
11. EPA and States need to commit more to performance-based outcomes, and ensure accountability for those outcomes.	Long Term	EPA/States
12. EPA and ECOS need to better define reporting requirements -- of what and to whom.	Long Term	EPA/ECOS
13. EPA needs to implement more outcome-based audits by EPA, not audits of activities.	Long Term	EPA
Integration		
14. EPA needs to recognize importance of NEPPS and integrate it into their Strategic Plan.	Short Term	EPA
15. EPA and State program managers need to spend more time up front evaluating performance outcomes vs. negotiating output activities.	Long Term	EPA/States
16. EPA needs to align GPRA, CPMs, National databases, and CEIS (one set of measures).	Long Term	EPA
17. EPA and States need to align and integrate all program and operating agreements with NEPPS.	Long Term	EPA/States
Information Sharing		
18. EPA and ECOS need to compile a Best Management Practices Manual that provides “helpful hints for success” and includes suggestions or successful programs. Example: <ul style="list-style-type: none"> • Existing incentives and rewards program • cultural change tips 	Short Term (and continued)	EPA/ECOS

During discussion moderated by Barbara D’Angelo, the following issues were raised:

Comment: Culture is the root of the issue. Look at agendas of meetings coming up (Regional/national and planning meetings). We should start plotting how to get on the agenda of those meetings.

Comment: If you need to update delegation agreements, OK. But delegation agreements are not just planning documents. They allow States to operate the program. Be careful how we talk about it and what we plan to do with them.

Response: Agree, but we should get them out and look at them.

Response: Look at and update, OK. But they provide the requirements for a State having the program. It becomes very tricky.

Q: Individual accountability is important to include. NEPPS hinges on the behavior of the individual in Regions, States and Headquarters. Why is this a long-term issue?

A: Can't change performance standards in 6-9 months. Takes time. (Took three years for Maryland to write performance standards that link to goals.) Also, States vary in their personnel requirements and systems.

Comment: We should start right now.

Response: The Administrator should tell the Regional Administrators, who tell the division directors, and so on.

Comment: Accountability starts with people attending the workshop. Need to start practicing what we preach. There are a lot of recommendations. We need to follow up, track how well we're doing. In a year or six months, report back on how well we are doing on following through.

Response: We have to add people, dates, responsibility and accountability. We can't do what we've done before (ignore recommendations).

Comment: We need to recognize when NEPPS was created it assumed two means of State-EPA engagement: 1) the historical categorical grants and workplans and 2) NEPPS. It was a State choice. We now have more and more States wanting to engage in NEPPS. EPA should organize itself around a NEPPS way of engagement. States should come to agreement that NEPPS is the standard way, not an option.

Response: The recommitment document should say one system. It can range from full implementation of NEPPS to an option to ask EPA to assign priorities. It should be one system, not program managers setting NEPPS aside and continuing on their way, yet recognizing that everyone's not there yet.

Response: If the thinking has evolved, maybe we should acknowledge it. Maybe two separate things isn't manageable.

Response: Is NEPPS mandatory or is it OK to do the old way?

Response: We need national recognition it's OK to do NEPPS.

Response: We need culture change to help EPA relate to States. Whether they do PPAs, PPGs or both. We need a set of principles that should be able to be applied, regardless.

Comment: We are recommitting to NEPPS. We don't want a NEPPS and a non-NEPPS world. Think of NEPPS as a framework, mindset and religion. Recommitment to better State-EPA relations. Move that to ECOS agenda. NEPPS is one way of doing that.

Comment: Even States that don't use NEPPS say they benefit from it. A growing number of States say they are past NEPPS. The EPA component of their agency has shrunk. They are spending their money on their issues and it's not worth fooling with it. For larger States, NEPPS is not as important.

Comment: The recommitment should be to performance-based, outcome-based environmental management, not necessarily NEPPS.

Comment: The recommitment should be to better EPA-State relations, culture change.

Comment: One of the issues on culture and integration that's missing is an effort to communicate and train internally. This was shallow in the early years and absent now. Training should emphasize that environmental outcomes matter, both to EPA and States. A NEPPS-like process can make a difference. Environmental outcomes should matter to you, that's why its important to pay attention to the system.

Comment: One of the barriers to joint planning is identified as "differences." Yet NEPPS is trying to create differences/flexibility. You can't have both. Need to reduce the angst about the differences.

Response: It's not so much the differences, but recognizing that States and programs have diversity in approach. The philosophy of NEPPS doesn't follow traditional roles and responsibilities and approaches. That's how they're different.

Q: The reaffirmation letter. Who does it come from and who does it go to?

A: From everyone to everyone. More people need to sign it and recommit; more EPA and State leaders.

Response: The letter should say we recommit to work and play well together. Not recommitting to "use the Massachusetts model."

B. Overall Discussion

Lingelbach summarized the discussion, suggesting three categories the planning committee might use to organize the recommendations:

- 1. (Re)commitment:** to the fundamental principles, not NEPPS necessarily. To more effective relationships between levels of government, more performance-based management and a measures-based approach. This would include letters, documents, training and more communication.
- 2. Coordination and Integration:** improving lack of consistency and systems that don't work well together, such as GPRA/NEPPS, grants/workplans. Need to make these systems more complementary and less at odds with each other. This may be less urgent and more long-term.
- 3. Performance Measures:** improving, refining and figuring out how to use performance measures.

Comment: Three areas are useful. We should assess the extent to which our recommendations are responsive to GAO, Academy researchers and IG recommendations.

Comment (Lee Paddock): A lot of the action items are directly responsive to research reports.

C. Closing Statements

In closing remarks on behalf of ECOS, Steve Brown noted the need for more teaching about how NEPPS fits into the environmental management system. ECOS members will discuss issues raised during the workshop at ECOS' spring meeting in Philadelphia. ECOS will distribute results of the workshop prior to the spring meeting, and work on the recommendations in Philadelphia. Among short-term recommendations, Brown offered the following:

- We can't give the NEPPS message often enough to people, not only at the commissioner and State worker level, but also at EPA and within EPA. We've done most of the salesmanship among our members, and left the marketing within State agencies to commissioners themselves. It may be time to develop a marketing plan, both for external and internal audiences.
- We need advocates for NEPPS because the original advocates have left or are leaving State government (Kathy Prosser of Indiana, Mary Gade of Illinois, Tom Looby of Colorado). That role may pass to the three ECOS members on the NEPPS Joint Evaluation Team: Lang Marsh of Oregon (ECOS Strategic Planning Committee chairman), Harold Reheis of Georgia (a past-president) and Bob Varney of New Hampshire (current past-president of ECOS).

In closing remarks on behalf of EPA, Diane Thompson offered OCIR's commitment to strengthen the management team within OCIR to more completely and fully represent NEPPS concerns within EPA's leadership councils and among assistant administrators, Regional administrators, their deputies, program managers and other working groups. She acknowledged a need to integrate NEPPS more effectively into EPA's operations. Second, she committed to work with her colleagues in EPA leadership to develop an accountability system to make NEPPS work, and to hold each person individually accountable. She noted there is a relationship between GPRA, NEPPS and strategic planning, and she committed EPA to having serious discussions of how to make them work better together.

On the workshop's specific recommendations and outcomes, she guaranteed that OCIR would take them and "very forcefully" represent them in agency councils, beginning with an RA/Deputy Regional Administrator meeting the following week in Washington. "It's important to identify what we do in the next year, and how to maintain focus, energy and enthusiasm during this time," she said. She emphasized that the workshop participants are the people who can strengthen institutional tools and capabilities. EPA needs to ensure it is giving its staff the necessary tools (such as negotiation skills) and structures (such as GPRA timetables) to improve State-EPA relations.

She offered OCIR's commitment to bring issues back to EPA, to renew the agency's commitment, energy and focus and ask EPA leadership to make decisions and address issues to better support Regions and States. Specific items on the agenda include:

- Moving from the macro, theoretical recommendations to specific action steps that are concrete and recognizable.
- Working internally and with ECOS to address issues raised during the workshop.
- Looking at obstacles and barriers that were identified previously, and to determine what was done.

- Communicating with participants in three to four months (possibly at ECOS spring meeting) on what EPA has done with the workshop recommendations

She said the EPA-State relationship is changing, and we need to keep changing to keep pace with those changes. NEPPS helps us address the challenge of managing change. “It is not an option. We have to make this work in ways that are respectful of new relationships and accomplish the mission we jointly share of protecting the environment and human health.”

VIII. Next Steps

Following the workshop, the workshop steering committee condensed the final recommendations into a set of tables, as shown below and on the following pages. These recommendations were to be reviewed by EPA's senior leadership team and Reinvention Action Council, as well as ECOS' Strategic Planning Committee. An ECOS-EPA committee working on a joint assessment of NEPPS also was to review the results.

BALTIMORE ACTION CATEGORY	ACTION RECOMMENDATION	WHO	WHEN	Priority (H/M/L)	STATUS
Recommitment: to the fundamental principles, not NEPPS necessarily. To more effective relationships between levels of government , more performance-based management and measures-based approach. This would include letters, documents, training and more communication.					
Communication	Sponsor Regional and national NEPPS meetings	EPA			
Communication	Reflect/promote NEPPS on the Web pages	EPA ECOS	ASAP	H	
Communication	Include NEPPS in the EPA Annual Report(s)	EPA			
Communication Leadership	Exchange recommitment letters among primary NEPPS participants	EPA STATES ECOS	ASAP	H	
Communication	Develop a communications strategy and outreach plan	EPA ECOS		M	
Accountability	Identify a new group of NEPPS champions	EPA ECOS		H	
Accountability	Raise NEPPS recommitment at ECOS Spring Meeting	ECOS4/00	On Spring agenda		
Measurement	Commit to more performance based outcomes and ensure accountability for them	EPA STATES			
Attitude/Culture	Increase face-to-face meetings	EPA ECOS STATES		H	
Attitude/Culture	The EPA Annual Performance Report should specifically acknowledge NEPPS	EPA			
BALTIMORE ACTION CATEGORY	ACTION RECOMMENDATION	WHO	WHEN	Priority (H/M/L)	STATUS

Coordination and Integration: improving lack of consistency and systems that don't work well together, such as GPRA/NEPPS, grants /workplans. Need to make these systems more complementary and less at odds with each other. This may be less urgent and more long-term.					
Accountability	Define "differential oversight"	EPA ECOS		L	
Accountability	Define the roles and responsibilities of States, EPA, and NPMs	EPA ECOS		L	
Integration	Integrate NEPPS into Agency strategic plan	EPA			
Integration Differences	Align GPRA, CPMs, National databases, CEIS 10 measures, ARR	EPA			
Integration	Align and integrate program and operating agreements	EPA STATES			
Measurement	Assess current alignment of national performance measures (CPMs/GPRA/NPMS/CEIS 10, etc.)	EPA ECOS		H	
Accountability	Inventory existing work at the State, federal, and local levels (copies of current NEPPS agreements)	EPA ECOS		H	
Leadership	Establish definitions and boundaries for joint planning and flexibility	EPA STATES			
Attitude/Culture	Create IPAs from EPA to States	EPA STATES			
Attitude/Culture	Leverage federal resources to do more State work	EPA			
Differences	Issue NPM guidance earlier	EPA			
Differences	Be involved earlier in guidance development	REGION STATES			

BALTIMORE ACTION CATEGORY	ACTION RECOMMENDATION	WHO	WHEN	Priority (H/M/L)	STATUS
Documents/Processes/Initiatives	Find out which Regions require BOTH workplans and PPAs	EPA	ASAP	H	
Documents/Processes/Initiatives	Revisit delegation agreements	EPA			
Documents/Processes/Initiatives	Reduce initiatives and align with NEPPS	EPA			
Differences	Continue flexibility with forward funding	EPA			
Accountability	Include NEPPS in EPA management reviews	EPA			
Performance Measures: improving, refining and figuring out how to use performance measures.					
Measurement	Include NEPPS in individual performance standards	EPA STATES			
Measurement	Define reporting requirements better	EPA ECOS		M	
Measurement	Implement more outcome based audits	EPA			
Integration	Spend more time evaluating performance outcomes	EPA STATES			
Attitude/Culture	Shift work focus from oversight toward environmental improvement	EPA			
Information sharing	Compile a/o endorse <i>Best Management Practices</i> manual for performance management systems	EPA/ ECOS Info Mgmt WG		M	WG met on 12/3/99

IX. Appendix

- A. Acknowledgements
- B. List of Attendees
- C. Agenda
- D. Summary of Evaluations
- E. Ross & Associates Summary of NEPPS Studies

A. Acknowledgements

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C. Agenda

1999 ECOS-EPA NEPPS Workshop
Breaking Down Barriers for Better Environmental Results
Nov. 30 - Dec. 2, 1999
Sheraton Inner Harbor Hotel
Baltimore, MD

FINAL AGENDA

DAY 1 - NOVEMBER 30, 1999

- 7:00 Continental breakfast**
Chesapeake Gallery
- 7:15 Registration desk open**
Chesapeake Gallery
- Opening Plenary Session - Chesapeake 2*
- 8:15 Welcome & Review of NEPPS Progress**
 Diane Thompson, EPA
 Robert Varney, New Hampshire DES
- 8:30 Purpose of Meeting/Format**
 Bill Crews, EPA NEPPS Team Leader
- 8:45 NEPPS Vision - Facilitated Discussion**

 Madeline Snow, Massachusetts DEP
- Purpose: To achieve greater understanding of NEPPS goals among States, regions, and EPA headquarters. Examine the original 1995 components of NEPPS. Are they still relevant? Identify the spectrum of goals, ideas and concerns under NEPPS. What is the future of NEPPS?*
- 10:30 Break**
- 10:45 Review of NEPPS Studies**

 DeWitt John, National Academy of Public Administration (moderator)
 Peter Guerrero, U.S. General Accounting Office
 Jeff Hart, Office of Inspector General, EPA Region 8
 Jeanne Herb, Tellus Institute
 Lee Paddock, Environmental Law Institute
 William Gormley, Georgetown University
- Purpose: To summarize recommendations of external NEPPS reviews by GAO, EPA's*

Inspector General and NAPA-affiliated researchers. Where have we succeeded and fallen short? Where do we need to focus our efforts to improve the NEPPS system?

- 12:00 Luncheon -- Chesapeake 1**
 Keynote Speaker:
 Virginia Wetherell, Image API, Inc.,
 Former commissioner, Florida
 Department of Environmental Protection

Plenary Session - Chesapeake 2
1:30

Issue 1: How Should NEPPS Change the Status Quo?

- Christophe Tulou, Christophe Tulou & Associates (moderator)
 Roger Kanerva, Illinois EPA
 Leslie McGeorge, New Jersey DEP
 Todd Biewen, Minnesota PCA
 Kerry Clough, EPA Region 8
 Denise Decker, USDA

Purpose: To identify changes that should accompany NEPPS implementation. To identify successes and cultural barriers to partnerships and performance-based management. To begin developing action steps that will remove barriers to change.

- ▶ Why did NEPPS envision the need for culture change?
- ▶ Why was the existing culture in States and regions not getting us where we need to go?
- ▶ How do you make effective culture changes throughout an agency? Examine tools,

organizational change and other methods of ensuring successful culture change.

- ▶ Examine implementation differences between and among States, regions and EPA headquarters.

2:30 Break

2:45 Breakout Discussions

- ▶ What do we need most to remove barriers to change?
- ▶ Identify possible action steps and performance measures

Plenary Session - Chesapeake 2

4:15 Report Back to Plenary

- ▶ Reports from breakouts
- ▶ Select possible top action steps & performance measures
- ▶ Identify issue leader (s)
- ▶ Identify volunteers to refine action steps and draft timeline by end of meeting

5:30 Wrap Up/Schedule for Day 2

Steve Brown, *ECOS*

5:35 Adjourn

5:45 Reception (cash bar)

Chesapeake Gallery

DAY 2- DECEMBER 1, 1999

7:00 Continental Breakfast

Chesapeake Gallery

Plenary Session - Chesapeake 2

8:00 Welcome/Review of Day One

Steve Brown, *ECOS*

8:15 Issue 2: Using Environmental Information for Decision-Making

Gerard Bulanowski, *EPA Region 8*, and Darryl Boudreau, *Florida DEP (moderators)*
Chris Simmers, *NH DES*
Carol Andrus, *Environmental Defense Fund*

James Conrad, *Chemical Manufacturers Assn.*
Mary McCaffery, *EPA One Stop Program*
Al Pesachowitz, *EPA Information Office*

Purpose: To discuss the role of performance measurement in the NEPPS system. To examine both the systems used to manage environmental information and how we use that information. To identify barriers to performance measurement and develop action steps needed to improve our ability to use environmental information in decision-making.

- ▶ What is the role of performance measurement in the NEPPS?
- ▶ How do we evaluate performance?
- ▶ What is the role of outside stakeholders in developing and using performance measurement systems?
- ▶ How do you use past performance to inform management decision-making?
- ▶ How can we make the system more efficient and less burdensome?
- ▶ What is the appropriate level (i.e. federal, state, local) for the development of environmental performance measurement systems?

9:15 Break

9:30 Breakout Discussions

- ▶ What do we need most to improve environmental information used for decision-making?
- ▶ Identify possible action steps and performance measures

11:00 Report Back to Plenary

- ▶ Reports from breakouts
- ▶ Select possible top action steps & performance measures
- ▶ Identify issue leader(s)
- ▶ Identify volunteers to refine action steps and draft timeline by end of meeting

12:00 Lunch on your own

Plenary Session - Chesapeake 2

1:30 Issue 3: Joint State/EPA Planning

Purpose: To identify ways to integrate State/EPA planning processes and implement our programs within a system based on the NEPPS philosophy. To identify barriers and successes in federal-State, multi-media planning. To begin developing action steps to improve joint planning.

Katrina Kipp, *EPA New England (moderator)*
 Darryl Boudreau, *Florida DEP*
 John Sandoval, *Idaho DEQ*
 Dave Small, *Delaware DNREC*
 Gerry Levy, *EPA New England (Region 1)*
 Helen Waldorf, *Massachusetts DEP*

- ▶ How do we jointly establish environmental priorities and allocate resources (e.g., flexibility in setting State vs. federal priorities, enforcement targeting, work-sharing, resource allocation)?
- ▶ Examine management structures that may impede progress toward joint planning.
- ▶ How do we integrate NEPPS with other planning processes and operating agreements?
- ▶ Examine differences among regions and States.

2:30 Break

2:45 Breakouts

- ▶ What do we need most to improve joint planning under NEPPS?
- ▶ Identify possible action steps and performance measures

Plenary Session - Chesapeake 2

4:15 Report Back to Plenary

- ▶ Reports from breakouts
- ▶ Select possible top action steps & performance measures
- ▶ Identify issue leader(s)
- ▶ Identify volunteers to refine action steps and draft timeline by end of meeting

5:30 Summary of Day/Adjourn

Bill Crews, *EPA*

DAY 3- DECEMBER 2, 1999

7:00 Cont. Breakfast *Chesapeake Gallery*

8:00 Concurrent Mini-Workshops

Purpose: How-to sessions, success-sharing and information briefings

Performance Partnership Grants

What's new in Part 35 regulations? How have States implemented and used multi-media PPGs? Timeliness of awards; grant revisions; process for receiving additional program dollars that become available toward end of year. *Potomac*

Public Participation

Showcase of successful State public participation processes. *Chesapeake 2*

Burden Reduction

ECOS and EPA efforts to encourage, support and share information on burden reduction. Regional and State examples. *Chesapeake 3*

Government Performance and Results Act (GPRA) and Core Performance Measures (CPMs)

How do we integrate CPMs and GPRA reporting requirements? How are Regions implementing CPMs within the PPAs? *Harbor 2*

9:30 Break

Final Plenary Session - Chesapeake 2

9:45 Action Plan Development

- ▶ Reports from Issue Leaders on suggested action steps and timelines
- ▶ Possible prioritizing of top actions
- ▶ Next steps and timeline

12:20 Closing Remarks

12:30 Adjourn

D. Summary of Workshop Evaluations

1. Did this workshop meet your expectations?

WHY

- "Yes" (x6)
- Yes - - It was good to see the commitment by EPA (from the large number of staff they sent. It was obvious the EPA is not at the same level of understanding that the states are, but I could see improvement over the 3 days.
- Yes - - Good discussion of what needs to be done.
- Yes - - It went well. We came up with some good action items.
- Yes - smaller group, one-on-one discussions.
- Yes - - I had specific expectations re: info management and, while follow-up will determine real success, expectations for this workshop were met.
- It is good to review where we've been and look to where we should go. So yes, it met my expectations.
- Yes - - notably different/more positive than the one in Providence.
- It will if ECOS/EPA follow through on workgroup recommendations.
- Yes - - learned about NEPPS.
- Yes - - I am new to the NEPPS arena and benefited from HQ's, regional, and state perspectives of the NEPPS process.
- Yes - - the workshop agenda was relevant to issues I'm struggling with in my region
- Yes - - excellent forum for someone who has less than one year of experience. Also valuable for "experienced" folks too.
- Yes - - always useful to talk to other states. I don't know everything.
- Yes - - varied issues and concerns about EPA's activities very useful.
- [Yes] because I needed to hear what other regions and states are going through.
- Yes - - it was better than some previous meetings I've attended. New speakers, including some from outside EPA and state

agencies were a good idea. Also, the focus on short term action items is a good approach.

- Expectations met
- Exceeded - - great enthusiasm and support for NEPPS! A good, practical cooperative spirit prevailed

WHY NOT

- No - - large groups have declining value for me.
- Close, but not quite.
- Not as efficient as it could be - too much repetition of what problems exist.
- Too much emphasis, too much time given to endless embellishment of problems. Too little time and attention given to a) problem solving, b) relationship building. [also cited in breakouts]
- Somewhat - - states were not as knowledgeable or engaged. EPA may have overwhelmed, at least in numbers.
- Too early to tell. In the past nothing has come of the action items. If the short-term solutions are implemented, then I would say my expectations were met. Also, the short-term solutions were not specific enough - How? Who?
- No - - it's the same thing discussed in the past and lack of some state participation from Western States.
- No - - much of it seemed to be a regurgitation of Providence. Let's get "real life".
- More EPA involvement than I expected. More sharing in small groups would have been helpful.

Were the Breakout Sessions Useful?

Yes

- Yes (x 6)
- Generally useful. I think they strayed a bit too much away from an emphasis on NEPPS specific ideas.
- Yes - fine. If breakouts are intended to solve problems - it would be helpful if the plenary panels focused on the problems rather than general presentations of what they are doing.
- Mostly
- I thought the breakouts were good.
- I think they [breakouts] should have been included in the workshop so everyone could benefit and not have to chose which one to attend. Topics were good and could have benefited from more than 1.5 hours.
- Yes, but in some cases they were redundant.
- Breakouts were useful. The only drawback was that it often seemed like the "right" people weren't present. Should be more program people engaged in this.
- Not only useful, essential.
- Breakout groups were very useful
- Yes, it helped to have smaller groups discussing barriers.
- Most were useful.
- Sessions were good.

No

- Breakout sessions - way too much time spent on problem definition - beating a dead horse.
- Too much emphasis, too much time given to endless embellishment of problems. Too little time and attention given to a) problem solving b) relationship building. (also cited in expectations).
- Did not focus on the change. The output of the combined workgroup was good.
- In the future it would help to have a different system for assigning individuals to the different breakout rooms to get a better mix of state and EPA participants.
- Too heavily EPA based, and I'm from EPA. More state involvement needed.
- The sessions were dominated by EPA people expressing frustration at their own internal process and/or regional/HQ issues. It's almost like EPA should have had their own NEPPS meeting before this one.
- Too much time spent on barriers/problems discussion
- Individually, the results from the breakout sessions didn't seem useful, but the sub-team did a great job of pulling together a good set of recommendations
- One or two were not.

Were Facilitators Effective?

Yes

- Yes (x3)
- Great job, could have done a little more prep to make sure facilitators delivered a consistent message and good intro.
- Partially.
- OK
- Overall the facilitators worked very well.
- One yes; one no.
- The facilitators did a good job
- Facilitators good.
- Bringing John L. in was key - action oriented. Aggressive but fair pace.
- Yes, use professional facilitators more.
- Facilitator did a good job trying to keep on track.
- Some of the facilitators were better than others. The gentleman from Ross Associates did a great job.
- Facilitators were effective.
- Okay. First facilitator didn't motivate people. Let EPA people talk too much - needed more state involvement.
- Most facilitators did a good job.
- Facilitators helped. Jim Bazemore did a good job.

- Facilitators not familiar enough with issues.
- Not all facilitators and recorders were effective.
- Some facilitators/recorders weren't as objective as they should have been. A difficult task.
- Could use better facilitation.
- Difficult for facilitator to keep large group on task. Need to work on this.
- Some facilitators had their own agendas. They did not encourage everyone to participate; allowed one or two to dominate.

No

Do You Support the Action Plan Items?

For the most part

- Yes (x 2)
- Yes, most of them are based upon improving communication. I believe this is key.
- Yes, and realistically I think re-commitment is the most important and doable short-term (1 year) objective. This can be a very important legacy to this administration.
- Yes. Need to be sure not to lose long-term actions.
- Good recommendations. Need follow up, follow up, follow up.
- Yes, as long as planning committee narrows action items to shorter list that can actually be accomplished.
- Yes - If they are carried out.
- Yes, there are specific doable items that will improve the NEPPS process.
- A more consistent format would have been better. Issue #2 was most effective in that it was succinct and it identified something to follow up.
- Yes, especially the culture change ones.
- Yes! We have a good start on long & short term fixes. Multi-media coordination at regional level. Why are EPA Regions management different, lack of consistency, headquarters.
- The action plan items are a good start. The planning group needs to look carefully at who is appropriate to address each one.
- Yes, consensus based and put forth by thoughtful, engaged staff. If this group can't figure things out, who can? Many, many years of experience.
- Culture recommendations especially hit home.
- Yes - participants did good job of finding problems and proposing solutions.
- Yes - support.
- Yes, there were no issues omitted

- Information - goal 2 especially good - Goal 1 very worthwhile Goal 3 - good
- Yes, to the extent follow up occurs to the action items.
- Yes, hold a commitment NEPPS meeting of EPA senior management to kick off implementation of next steps (pre-sold and pre-arranged) such as negotiation training for regional staff, IPAs, performance standards, etc.

But there were some doubts

- It was not clear that several times over the course of the three days and in the breakout sessions the push for an EPA advocate is needed. EPA should put the NEPPS/PPG on the same level as the NPM's. Without an advocacy office NEPPS is at risk not to be institutionalized.
- Many of the short-term actions are too broad. I generally support the action plans, especially engaging senior EPA leadership at both the HQ and Regional levels.
- I do not fully support it because it relies too much on our (EPA & State) management to lead. Without their putting their foot down on the staff that are recalcitrant, there is too much room for sabotage.
- Not all of them - It is extremely naïve to talk about revisiting delegation agreements and GPRA without program office involvement. Spend time tackling what you can fix about the federal/state relationship rather than taking on virtually impossible projects - at least in the short-term.
- I disagree with one set of measures, if it is mandatory. "ONE SIZE DOES NOT FIT ALL". Focus on maximum FLEXIBILITY.

Suggestions for Future Workshops

Logistics

- So many brought up same issues, why not do e-mail survey of problems beforehand, then concentrate on solutions, actions.
- More problem solving; more doings, showing, sharing of things that worked; more relationship building and possible joint activity that unites the group, i.e., there was a conference given in Annapolis a year or two ago that featured a spellbinding talk by a former U.S. poet laureate, Robert (?), who is now a leader in an elementary education/environmental project called a River of Words (I think). Also, the Annapolis setting was more conducive to relationship, team building.
- Perhaps a site farther from HQ would improve the state/EPA ratio.
- All action plans need to be disseminated to all participants at conference. This will assist EPA Regions and states.
- Have them (workshops) on a regular basis on or around the same time of year, so I don't have to get on my knees and beg for money to attend this.
- More mini-workshops and allow time for you to attend at least two.
- The first day was way too long. The luncheon was nice, but with an 8:00am start and a 5:30pm end time and no significant breaks, it was too much time for one day.
- Nice location.
- Less evening work; stop earlier and let me work so they have time for evening activities. I believe you would have more participants.
- More time to mingle, personal relationships are very important to this effort.
- Split breakout sessions in two - first one identifies the challenges, second one proposes and schedules the solutions.
- Ensure that summary information from workshops is provided to all participants.
- In final workshop proceedings, please include full participant contact information - full address at most - full e-mail at least.

Substance

- Focus on areas where the biggest gains can be made rather than the biggest perceived problems. As an example, get Congress to understand outcome measures and develop one program to measure progress.
- Have specific goals for each breakout session.
- At future meetings focus on issues to be addressed and expected results as much as possible.
- Include poster session of successes from states.
- It would be interesting to see a national chart by State with info on where they are with PPAs, PPGs, and other NEPPS activities.
- Let's get beyond the same old gripes and issues.
- Stop complaining about reporting burdens and sit down at the table and figure out what is and isn't needed.
- What are people really doing? What is working "practically"? What isn't?
- I'm not a planner. This seems to be a "planners" conference. This reminded me of the comparative risk conferences of the early '90's.
- Many of the things discussed may already have solutions out there that these people aren't aware of.

■ Participation

- Smaller groups (more focused discussions)
- Can EPA HQs limit the number of attendees? HQs has a tendency to dominate the conversations.
- Need more high level people (Administrator, AA, DAA, etc.) to show Regions/States the "commitment" to NEPPS at that level.
- Figure out a way to get more program (as opposed to planners) staff and management engaged in the meeting.
- Need quarterly regional NEPPS meetings.
- Being from a state, I find value and get inspiration hearing from states that are experimenting and succeeding in their performance measures and performance management efforts. In future meetings I would like to see states given the opportunity to share. These could be sprinkled over the two days and should be more like 20 minutes rather than 10 minutes.

- Greater representation of EPA program staff and the state staffs who are actually charged with negotiating and implementing NEPPS.
- Breakout sessions to discuss issues/recommendation between individual EPA Regions and their corresponding states. This might enhance implementation of action plans.
- A greater OECA presence was needed.
- If enforcement is an issue, get OECA to the table.
- May be helpful to have more senior level people participate
- Encourage equal participation with states and EPA

Other Comments or Suggestions

- Overall, well planned, well organized, well run, focussed, action-oriented. Informal conversations very useful, Need to have fun when you are meeting for 2-3 days.
- Good job. Very valuable.
- Well done and organized. Let's do it! NEPPSize!
- ECOS needs to approach EPA on "a lot of these issues deal with lack of EPA leadership and management".
- Report to the group on some of the commitments that were made in the '97 affirmation of the NEPPS agreement. For example, the '97 memo said a joint group was formed to look at the burden reduction. What was the output from that group? Also, make sure everyone has read the NEPPS policy statement. Based on some of the comments, it was apparent to me that a lot of people were not familiar with the fundamentals outlined in the joint policy statement .
- I appreciate all the good work of the meeting planners.
- Perhaps involve Congressional staff so they can see the problems generated by their single media approach to EPA legislation and the problems generated by the proliferation of earmarked funds.
- Keep up the great work.
- NEPPS IS NOT JUST MEASUREMENT. I think the question that needs to be asked is, "Why did half the states believe this conference was not of enough value to participate?"
- Too many talking heads.
- Maybe offer NEPPS refresher for those not familiar.
- Great job, Bill, broken arm and all!!!

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How Well is NEPPS Working?

**A Summary Comparison of
Several Recent NEPPS Evaluations**

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Introduction

This paper summarizes and compares a number of recently conducted evaluations of the National Environmental Performance Partnership System (NEPPS).¹ It is intended for use by State and EPA officials and other interested parties who are considering next steps to improve the NEPPS process. In particular, attendees at the 1999 ECOS-EPA NEPPS Workshop, and senior EPA and ECOS officials charged with joint evaluation of the NEPPS process, may find this a helpful primer. This brief synopsis aims to highlight key findings of, as well as the consistencies and differences among, the reports. The process of distillation by its nature tends to simplify and eliminate details. Readers with an interest in understanding the issues raised here will benefit from reading the detailed problem analyses and recommendations contained in the original reports.

The remaining text organizes the evaluations' conclusions into a set of general findings, and findings in five specific categories: joint strategic planning/priority setting, administrative flexibility/burden reduction, programmatic flexibility, performance measurement, and public participation. Attached to this memo are two tables that provide a more detailed comparison and summary of each report's findings. Table 1, the NEPPS Evaluations Summary Matrix, provides an easy way to scan each report's conclusions on how well NEPPS has achieved its objectives and potential in the five categories named above. Table 2, Selected Findings and Examples, organizes key findings and examples from each report into Positive Outcomes and Reasons for Success, Examples of NEPPS Successes, Barriers and Reasons for Lack of Success, and Recommendations. These more detailed findings and examples are also organized according to the five categories described above.

General Findings

The evaluations are generally quite consistent in the benefits and successes they attribute to NEPPS implementation, as well as in the problems, and underlying causes of those problems, they identify. Recommendations for improving the NEPPS process, however, vary widely. The majority of those interviewed for these reports supported the philosophy and objectives of NEPPS. All the reports found that participants in the NEPPS process believed that it had been beneficial and had improved the state-EPA relationship. In particular, the evaluations identified improved communications between EPA and the states, as well as greater senior management attention to program priorities and issues, as frequently cited NEPPS benefits. However, most evaluation participants also believed that progress to date falls substantially short of the overall promise and potential of NEPPS to improve the State/EPA partnership and enhance the achievement of environmental results. The NEPPS process resulted in the most successful outcomes in those states and EPA Regions that were committed to developing performance-based management system, and that benefitted from the active support and involvement of the agency's top leadership.

Joint Strategic Planning and Priority Setting

The evaluations indicate that while the NEPPS process has facilitated a move towards a partnership between EPA and states through improved communication and joint planning, a more rigorous and robust

¹ The reports that were reviewed include: seven Office of Inspector General (OIG) Management Assistance Reviews (MARS) for the States of Alaska, Colorado, Connecticut, Delaware, Georgia, Indiana, and Texas; two OIG Regional Audits of Regions 4 and 8; a systemic review of the NEPPS system by the United States General Accounting Office (GAO); and meeting summaries from the Denver and the Providence NEPPS Training Sessions. The National Academy of Public Administration (NAPA) is also reviewing the NEPPS process; no public review drafts were available to include in this summary document.

joint strategic planning and priority setting process is needed for the success of NEPPS. Joint strategic planning and priority setting are critical to the NEPPS process in that they foster understanding between EPA and states and lead the relationship from one based on a historical EPA oversight role to one based on partnership, focused on results. The evaluations suggest that a stronger joint planning process will enable federal and state agencies to tackle related issues of accountability, program flexibility, and differential oversight more effectively .

The reports cited the following current barriers to joint strategic planning efforts:

- Disagreement both within EPA (particularly between Regions and Headquarters), as well as between States and EPA, about the role EPA should play in enforcement and compliance, the level of necessary oversight, the type of data states should report to maintain accountability, and the amount of work sharing that should occur;
- Lack of clear EPA guidance about how to implement joint strategic planning; and
- EPA's size and complexity inhibiting internal communication.

Some successful examples of joint planning and priority-setting were identified. For example, the Region 8 OIG Audit highlighted the joint process used by the Utah Department of Environmental Quality, a state regional health agency, and EPA Region 8 to develop solutions to some of the region's environmental problems.

Selected recommendations for improving the planning process include:

- Develop a more rigorous joint strategic planning/priority setting process through EPA guidance;
- Strengthen the state self-assessment process to provide more state accountability; and
- States and EPA each develop agreed-upon, well defined priorities before entering the joint strategic planning process to improve negotiations and to ensure full buy-in and cooperation (e.g., without full agreement among EPA managers about program oversight of NEPPS states, emphasis on accountability concerns constrains opportunities for differential oversight and burden reduction).

Administrative Flexibility/Burden Reduction

The evaluations indicate that NEPPS participants' experience with administrative flexibility and burden reduction were mixed. Most NEPPS participants experienced some administrative flexibility and savings; however, certain states actually noted increased burden. The evaluations identified two primary impediments to flexibility and burden reduction:

- EPA accountability concerns lead to identical or increased state reporting requirements, as EPA program managers are inclined to retain existing measures of state activity until results-based systems prove to be an effective alternative (this impediment is closely tied to joint strategic planning/priority setting and agreement on internal priorities); and
- State financial management systems built for administering grants along media program lines constrain the resource flexibility that over-arching NEPPS grants can offer.

Utilizing results-based performance measures is more difficult than tracking traditional activity measures and will in many cases tend to increase the cost of data collection and reporting. Therefore, NEPPS participants moving towards a performance-based measurement system may, in at least some instances, need to increase investments in data collection and reporting, which may be contrary to many states' expectations of reduced reporting.

Selected recommendations for enhancing flexibility and reducing burden include the following²:

- Creating state financial management systems that can flexibly administer non-categorical grants; and
- Supporting “differential oversight,” thereby reducing state reporting burden and other administrative costs, through strengthening the joint strategic planning/priority setting processes.

Programmatic Flexibility

NEPPS participants indicated that significant institutional barriers have impeded the utilization of programmatic flexibility potentially available through Performance Partnership Grants (PPGs). The evaluations identified the following barriers to programmatic flexibility:

- Individual media programs’ program-specific focus results in resistance to funding multi-media projects that do not directly benefit a specific program;
- EPA program-by-program organization and operations management constrain funds transfer across media program lines (e.g., national program offices set rules on media-specific program money use, which in turn limits state-level media program fund transfers); and
- State and federal legislative/regulatory requirements often earmark money (and require tracking) according to specific programs.

The evaluations did identify instances where NEPPS participants successfully utilized programmatic flexibility. For example, Minnesota, partly as a result of a cross-media agency re-organization, was able to take effective advantage of the flexibility offered with their PPG. North Carolina and Utah also implemented cross-media program fund transfers.

Some evaluators suggested very specific ways to improve programmatic flexibility within the current institutional framework. However, the evaluations suggest that, to realize the promise of NEPPS flexibility, EPA and states will need to find ways to address systemic, institutional barriers such as media-specific program management.

Selected recommendations to improve flexibility include:

- EPA should improve guidance on the development and implementation of the PPA/PPGs that clarifies the circumstances under which cross-program funding transfers may occur; and
- EPA and states should create incentives for individual media programs to participate in multi-media initiatives

Performance Measurement

NEPPS places a strong emphasis on environmental performance measurement as a key component of developing a more results-based management system. Accordingly, the evaluations paid substantial attention to performance measurement. The evaluations reflect a consensus that substantial progress has

² The 4/15/99 *Addendum to 1997 Joint Statement on Measuring Progress under NEPPS: Clarifying the Use and Applicability of Core Performance Measures*, signed jointly by ECOS and EPA leadership, affirms the joint commitment to reducing unnecessary state reporting, and establishes a policy framework that uses the value of information, balanced with its cost, as criteria for determining what information is (or is not) necessary. The *Addendum*, and an April 7 memorandum from Peter Robertson entitled “State Partnership on Burden Reduction,” set in motion a process whereby EPA and States are encouraged to discuss potential information collection/reporting changes that would result in higher value/lower cost information.

been made in measuring program performance and environmental outcomes. The FY2000 Core Performance Measures agreed upon by EPA and ECOS are regarded as a substantial improvement over prior versions, with fewer total measures and a greater percentage of outcomes. Despite progress, measures that truly link program efforts to environmental outcomes remain far too few, and most NEPPS participants believe that performance measurement still has a long way to go before it truly supports outcome-based management. While state and federal managers generally support the concept of performance measurement, there are many varied ideas about how to implement it. Some states, such as Florida and Minnesota, have gone beyond the national CPMs and developed their own state-specific measures.

The reports identify a number of reasons why performance measures have not yet fulfilled their potential.

- Confusion exists about whether reporting of CPMs by states is required, and about the uses and applications of CPMs (are they to measure individual states' performance, compare states using common benchmarks, or 'paint a national picture?').³
- Measurement of programmatic effectiveness and environmental results is inherently more challenging than tracking program activities, and requires a long-term commitment to be successful. Challenges to developing effective performance measures include the following.
 - Quality data necessary for connecting program performance to environmental conditions are lacking. Certain evaluations suggested that it may take years of data collection to support environmental trends measures.
 - Isolating environmental agency impacts on environmental quality from other significant drivers such as environmental activity, life style changes, environmental attitudes, and climate variability has proven difficult.
 - State capacity to support the resource-intensive process of developing measures tying agency actions to environmental outcomes is constrained.

Selected recommendations for improving performance measurement include:

- Continue developing performance measures that tie program activities to environmental conditions, while revising expectations for their development and utilization to acknowledge that it is a large, expensive, and time consuming endeavor;
- Revise expectations and investment plans to recognize the inherent complexity and the long term data needs of performance measurement; and
- Clarify state CPM reporting requirements to minimize future confusion.

Public Participation

Most of the evaluations spent little time addressing the issue of public participation in the NEPPS process. Some reports noted the absence of public participation and suggested that involving the public would greatly improve NEPPS outcomes, through both additional input and greater knowledge and buy-in. Several reports suggested that EPA and the states make future public participation in NEPPS a higher priority.

³ The 4/15/99 *Addendum* (cited above) attempts to address these questions. The *Addendum* may have been too recent to be well known to those interviewed in the course of many of the studies reviewed here.

NEPPS Evaluations Summary Matrix

Report	Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
MAR Connecticut	Experienced administrative savings due to flexibility; data reporting increased	Difficulty in shifting funds across programs; marginal flexibility achieved	Most CPMs incorporated, but not measuring environmental results; progress made on environmental indicators	Communication & coordination improved	PPA increased pace of outreach activities
MAR Alaska	Increased flexibility to move resources within water programs	Increased flexibility for State over what is to be accomplished, but program performance suffered, according to EPA	CPMs not incorporated into PPA/PPG; no data available for some CPMs	Communication between State & Region enhanced due to priority setting; priority setting took place too late & EPA program officials were left out	public participation did not increase
MAR Texas	State experienced reporting reductions & savings preparing the PPG, but EPA did not experience any savings	Burden increased in order to learn how to manage programs differently	Did not incorporate all CPMs in PPA; not measuring environmental results	Improved negotiations	
MAR Indiana	Financial management system increases administrative burden and decreases flexibility	Difficulty in shifting funds across programs, but some multi-media initiatives were funded	CPMs incorporated, but not measuring environmental results	Communication between Region and State improved; internal communication needs improvement	
MAR Delaware	Burden increased by placing administrative and technical requirements on top of existing ones	Did not achieve flexibility	No mention of CPMs or measurement of results	Relationship strong, communication positive	

Note: The meeting summaries from the Providence and Denver NEPPS meetings are not included in this comparison chart because those meetings reflected a range of opinions and ideas, and did not result in summary findings in the key topic areas described here.

NEPPS Evaluations Summary Matrix

Report	Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
MAR Georgia	Realized administrative efficiencies, but no reduction in reporting to Region; new consolidated grant administration procedures instituted	~ Did not need to move funds, but feels that the flexibility exists	CPMs incorporated, but not measuring results. Groundwater program developed performance measures	Process improved relationship by emphasizing partnership	Minimal past public involvement in PPA/PPG process, but taking steps to involve public more
MAR Colorado	No savings	Difficulty shifting funds within & across programs, but had some success funding cross-cutting initiatives	CPMs incorporated, but not measuring results	Partnership strengthened	Public participation increased
GAO	Majority of states achieved modest reporting reductions; improved workload sharing & oversight reduction, and some states had increased reporting &/or oversight	Limited ability to shift resources across programs, but some multi-media projects funded	Progress with 2000 CPMs—fewer measures, more outcome-based.	Improved EPA/State communication / relations; states more involved in joint enforcement planning & priority-setting; some instances of decreased oversight	~ Limited public participation so far, with few exceptions.
Region 4 IG Audit	Some states had reduced administrative burden while others had increased burden	~ States did not fully utilize flexibility for multi-media planning or prioritization of work	Delays in negotiating CPMs with states; not all states are including CPMs	Lack of communication between Region 4 and states led to confusion	
Region 8 IG Audit	States realized varying degrees of administrative savings; Tribes realized large savings; in general, reporting increased under PPGs	~ Flexibility not fully achieved due to barriers to shift funds	~ Confusion about CPMs; CPMs not clearly identified in workplans	Relationship strengthened due to more joint partnership; in some instances the relationship between EPA & states was strained by NEPPS	

Legend (ratings inferred from evaluators' comments):

± modest improvement; some success
little or no progress

± some success; some failure
| mixed and failed

A Summary Comparison of Several Recent NEPPS Evaluations — DRAFT: November 16, 1999

More Specific Summary Results

Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
Positive Outcomes and Reasons for Success				
<p>–reduced reporting burden (MAR-TX, GAO)</p> <p>–reduced paperwork to apply for & receive federal support (MARs CT, GA)</p> <p>–2 year grant cycle (MAR-CT)</p> <p>–flexibility in staffing (MAR-CT, GAO)</p> <p>–reduced on-site reviews/ programmatic oversight (GAO)</p> <p>–reduced number of grants (MAR-CT, Reg 8)</p> <p>–condensed individual work plans (MAR-DE, GAO)</p> <p>–workload sharing (GAO)</p>	<p>–money could be transferred across programs through PPG (GAO)</p> <p>–high priority cross-cutting initiatives were able to be funded (MAR-CO)</p>	<p>–states/ programs that made progress already had performance based management system (GAO)</p>	<p>–high management support & involvement (MARs CT, GA, CO)</p> <p>–central point of contact to coordinate, negotiate and manage PPA (MAR-CT)</p> <p>– provided opportunity to jointly discuss priorities, thereby increasing communication (MARs CT, AL, TX, IN, DE, GA, CO, Reg 8, GAO)</p>	
Examples of NEPPS Successes				
<p>Connecticut MAR</p> <p>Texas MAR</p> <p>Georgia (MAR, Reg 4)</p> <p>Maine, Florida, Georgia,</p> <p>Minnesota (GAO)</p> <p>Tribes (Reg 8)</p>	<p>Florida Quality Assessment Management Plan (GAO)</p> <p>Minnesota (reorganized agency to eliminate media-specific structure) (GAO)</p> <p>North Carolina (implemented multi-media inspection project) (GAO)</p> <p>Colorado was able to fund pollution prevention and community-based environmental protection initiatives (MAR-CO)</p>	<p>–Groundwater program in Georgia has developed new performance measures that may serve as a model (MAR-GA)</p> <p>–Minnesota has reorganized their agency to a multi-media structure and has made great progress in measuring performance (GAO)</p>	<p>–Utah has a strong history of strategic planning and used NEPPS to bring Reg 8 and the regional health agency together to develop solutions to the region's environmental problems (Reg 8)</p>	<p>– the PPA process increased public participation in Colorado and Connecticut (MARs CO & CT)</p>

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More Specific Summary Results

Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
	<p>Delaware (funded the Whole Basin Initiative, a multi-media project) (MAR-DE)</p>			
Barriers/Reasons for Lack of Success				
<p>–state financial management systems are separated by media; built for administering categorical grants (MARs IN, DE, & CO)</p> <p>–administrative & technical requirements superimposed on existing processes (MARs DE & GA, Reg 8)</p> <p>–State legislative requirements for tracking funding by program (MAR-CO, GAO, Reg 4, Reg 8)</p> <p>–EPA statutory/regulatory reporting requirements (GAO)</p> <p>–EPA's reluctance to reduce oversight w/o measurable assurances that goals are met (GAO)</p> <p>–Challenge of EPA communicating through a complex organization (GAO)</p>	<p>–difficulty shifting funds across programs, strong institutional barriers i.e. legal reporting requirements, strong constituencies, media-specific accounting/ information systems (MARs CT & CO, Reg 8, Reg 4, Denver, GAO)</p> <p>–lack of process to identify priorities & invest or disinvest (Reg 8)</p>	<p>–lack of or no data (MARs AL, IN, & CO, GAO, Reg 8, Denver)</p> <p>–hard to develop measures when there are different effects on the envt. and results aren't immediate (MARs IN & CO, GAO)</p> <p>–lack of resources to build infrastructure for obtaining quality data (MAR-CT, GAO)</p> <p>–states do not want new requirements (MAR-IN, MAR-DE, Providence)</p> <p>–conflict between measuring performance under NEPPS and outputs under GPRA; EPA still asking for outputs (GAO, Reg 8, Denver)</p> <p>–conflict over how much states can deviate from CPMs and if they have to include in PPA (GAO, MAR-TX)</p> <p>–Regional staff disagreed over issue of CPMs being enough to ensure accountability (Reg 8)</p> <p>–no agreement on who analyzes data for CPMs (Denver)</p>	<p>–internal communication within both States & EPA needs improvement (MAR-IN, Providence, MAR-AL)</p> <p>–Regional staff disagree on how the program should be run–this results in the same or increased oversight (Reg 8, Providence)</p> <p>–not enough HQ support for NEPPS (Denver)</p> <p>–lack of NEPPS leadership & guidance from EPA (Denver, Providence)</p> <p>–overall confusion about NEPPS (Reg 8, Denver)</p> <p>–lack of resources–time, people, \$ (Denver)</p> <p>–conflicting priorities and agendas within EPA, within states and between EPA & states (Denver, Providence)</p>	
Recommendations				
<p>–States should select & implement a comprehensive financial management system in order to be equipped to handle cross-program</p>	<p>–EPA should develop written guidance on development and implementation of PPA/PPGs (MARs DE, IN & CO, Reg 8,</p>	<p>–work on developing performance measures that are better indicators of environmental results (MARs AL, TX, IN, DE, CO, GA & CT, GAO, Reg 8, Denver)</p>	<p>–Region & State should jointly set priorities before State proposes budget (MAR-AL, Denver)</p>	<p>–determine how effective public participation in NEPPS can be ensured (GAO, MARs GA & AL)</p>

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More Specific Summary Results

Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
<p>funding (MARs IN & DE)</p> <p>--Region & State should discuss oversight approaches and should include enforcement staff (MAR-CO, GAO, Denver)</p> <p>--EPA should evaluate current reporting w/ GPRA requirements (Denver)</p> <p>--decide what is required in annual year reports and joint process evaluation (Reg 8, MAR-GA)</p> <p>-- implement 2 year grant cycle (MARs CT & GA)</p> <p>--State & Region should work together and establish a time frame to identify & eliminate duplicate reporting (MAR-CT, Reg 4)</p> <p>--increase emphasis on adopting federal-state workload sharing (Providence)</p> <p>--establish a self-assessment process that will provide accountability and more informed differential oversight (Providence)</p>	<p>Denver)</p> <p>--EPA & State should develop an organizational structure that supports multi-media and/ or geographic-based approach to environmental protection (MAR-DE)</p> <p>--EPA & State should facilitate priority setting, allow disinvesting in lesser ones and shifting of resources (MARs CT& CO, GAO, Reg 4)</p>	<p>--identify short term goals that would allow results to be seen early (MAR-IN)</p> <p>--clarify reporting requirements: define what needs to be reported on for CPMs (MAR-GA)</p> <p>--states & EPA should agree on whether CPMs are sufficient alone for accountability (Reg 8)</p> <p>--assign resp. to a specific office or person for monitoring progress in getting CPMs in PPGs & maintains communication (Reg 4)</p> <p>--need to better understand connection between GPRA & CPMs (Providence & Denver)</p> <p>--establish roles-- determine whose responsibility it is to "roll up" data/analysis for CPM/GPRA (Denver)</p> <p>--Region 5 should consider reforming Indicators Steering Committee (MAR-IN)</p> <p>--consider including performance measures as part of employee evaluation & reward system (Reg 8)</p>	<p>--Region should keep State senior management & staff informed of NEPPS concept & its benefits (MARs IN & CO, GAO, Reg 4)</p> <p>--Region & State should ensure necessary people are trained in the process (to support cultural change) (MARs IN & CO, Providence)</p> <p>--roles and responsibilities and partnership need to be defined (MAR-GA, Reg 8)</p> <p>--Region & State should continue to work together on different issues such as CPMs, enforcement, annual evaluations, & work sharing (MARs CT & CO)</p> <p>--senior managers should be more involved in cross-media discussions (MAR-DE, Denver)</p> <p>--Region & State should consider cross program teams to negotiate PPA/PPG (MAR-GA, Denver)</p> <p>--require regional staff to attend and participate in all PPG related meetings (Reg 8)</p> <p>--encourage state reps to include state legislative staff in a joint priority setting session (Denver)</p> <p>--bring enforcement & compliance into NEPPS agreements (Providence)</p>	

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