

US EPA ARCHIVE DOCUMENT

# VEEP Integration Project

## DEQ Program Manager Survey Results

Richmond, Virginia  
January 28, 2008

*This document is confidential and is intended solely for the use and  
information of the client to whom it is addressed.*

## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Program Manager Survey Analysis
- ▶ In-depth Survey Analysis

## Executive Summary:

### ► Methodology:

- Surveyed 108 program managers representing DEQ's central office, regions, and across functional areas
- Objectives: Do staff understand VEEP? Do they see a role in VEEP? Are they able to support VEEP?

### ► Response:

- 81% (87/108) Response Rate
- 47% of respondents reside in Permits & Compliance
- 39% of respondents were central office program managers; 61% of respondents were regional program managers

### ► Analysis: The survey showed DEQ program managers need more information on VEEP, its benefits and where to go when they have questions

- 58% of respondents believe they have a moderate level of understanding of VEEP
- 88% of respondents believe VEEP is important, 86% believe the program has a positive impact on the environment; however 61% of respondents said they do not have enough information
- Although 40% of respondents do not actively promote VEEP, 73% of respondents believe they can do more to promote the program

### ► Key Improvements Identified through the survey:

- Publish clear, quantifiable benefits of VEEP participation for program managers
- Communicate more about VEEP and include information in DEQ training sessions
- Develop more reference materials and support program managers via existing tools (e.g., intranet)

## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Program Manager Survey Analysis
- ▶ In-depth Survey Analysis

# 108 DEQ program managers were surveyed to baseline organizational understanding and support for the VEEP program

## Survey Methodology

### Survey Team

Survey Lead: Sharon Baxter

Consulted: Eileen McGovern, Oversight Committee, Booz Allen Hamilton

#### Primary Objectives:

- ▶ Establish a baseline of the extent to which DEQ management:
  - Understand VEEP
  - Understand their role in supporting VEEP
  - Understand how they can use VEEP to meet agency goals
- ▶ Identify ways to improve VEEP support and implementation

#### Design Survey Instrument

- ▶ Identify survey objectives
- ▶ Define survey approach
- ▶ Develop survey protocol
- ▶ Review and revise survey protocol
- ▶ Identify survey participants
- ▶ Post survey to online tool

#### Deploy Survey

- ▶ Pilot survey with Oversight Committee test group
- ▶ Review and revise survey protocol
- ▶ Deploy survey to full sample population

#### Analyze & Report Results

- ▶ Collect survey results
- ▶ Analyze data for statistical significance and general trends
- ▶ Evaluate results and draw conclusions
- ▶ Develop survey report
- ▶ Deliver results

#### Survey Administration:

- ▶ The online survey was deployed from December 4-14 2007
- ▶ The survey consisted of 24 questions
- ▶ Survey Monkey was used to collect results
- ▶ The oversight committee served as a pilot test group
- ▶ 87 of 108 eligible DEQ managers responded to the survey; finance and personnel divisions were excluded

## Table of Contents

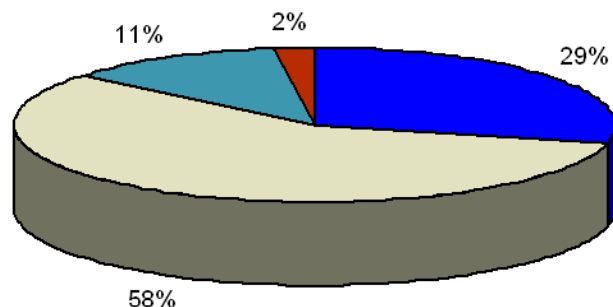
- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis
- ▶ In-depth Survey Analysis

## Program managers who responded to the baseline survey had a moderate understanding of VEEP; however their detailed knowledge is limited

### ► Levels of Understanding:

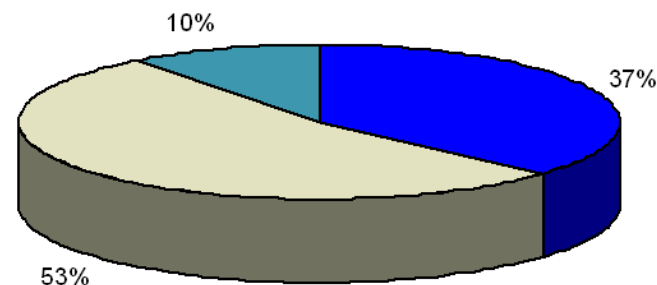
- ~87% of respondents believe they have a beginner or mid-level knowledge of VEEP, only 10 (11%) respondents believe they have an advanced knowledge
- ~62% of respondents acknowledged that they understand the criteria for participation in VEEP, ~38% did not
- A notable amount of responding program managers (~37%) falsely believe that VEEP participants are able to reduce their compliance requirements

**Question 2: My understanding of the Virginia Environmental Excellence Program (VEEP): (Rate from beginner to advanced)**



■ Beginner ■ Mid-Level ■ Advanced ■ I Don't Know

**Question 6: After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements**



■ Responded with Agreement ■ Responded with Disagreement ■ Did not know

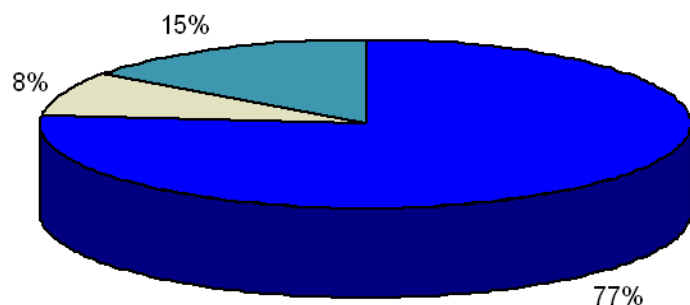


## A majority of respondents are very supportive of VEEP and personally think that it makes a difference...

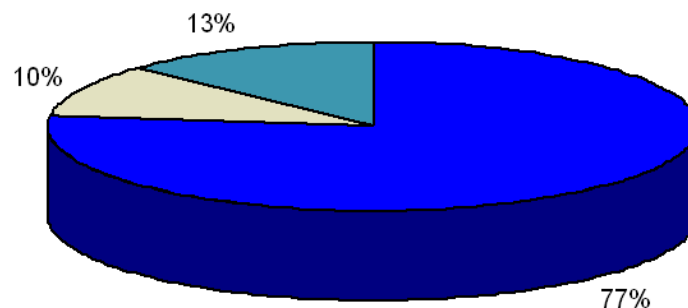
### ► Levels of VEEP Support:

- With their current levels of understanding, many respondents (77%) believe VEEP positively impacts the environment
- ~77% of respondents personally felt VEEP was important to them indicating a very strong support base for the program

**Question 9: I believe that VEEP is having a positive impact on the environment**



**Question 10: Improving participation in VEEP is important to me**



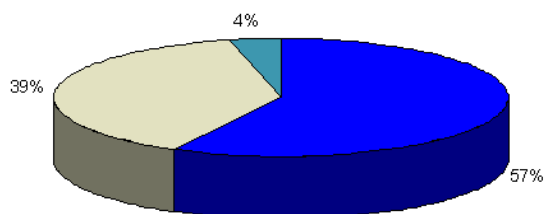
■ Responded with Agreement ■ Responded with Disagreement ■ Did not know

**...however, many program managers do not feel comfortable explaining the program or actively encouraging participation and want to do more**

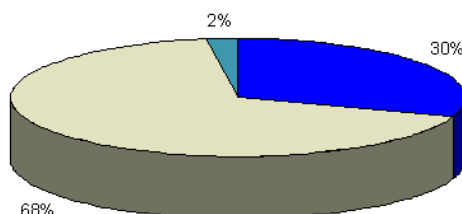
► Levels of Participation:

- Respondents showed hesitation in promoting the program. A contributing factor is a dominant feeling of not being sufficiently aware and capable of discussing program rewards and incentives
- Encouragingly, ~70% of respondents feel that they can do more to promote VEEP

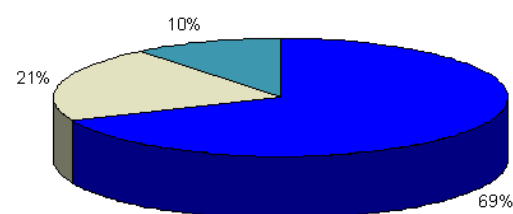
**Question 15: I actively encourage eligible facilities to participate in VEEP**



**Question 16: I feel comfortable explaining the incentives and rewards available for VEEP participants**



**Question 18: I feel there is more I could do to promote VEEP to potential participants**



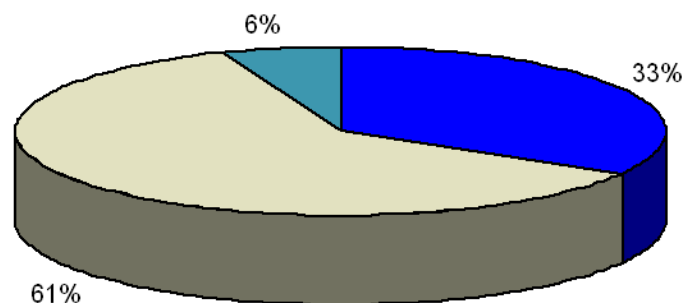
■ Responded with Agreement ■ Responded with Disagreement ■ Did not know

## In order to aid program managers promote VEEP it would be beneficial to give them access to increased amounts of VEEP information

### ▶ Helping Program Managers Succeed:

- By supplying information via preferred channels such as the DEQ intranet, training and points of contact, program managers will feel better equipped to discuss the program with potential participants
- Information should focus on VEEP rewards and incentives due to the large percentage of program managers that responded that they were unfamiliar with this aspect of the program

### Question 20: I have the information and materials I need to promote VEEP to potential participants



### ▶ Preferences for receiving information about VEEP include:

- DEQ Intranet
- Training
- A point of contact within DEQ

## Recommendations fall into 3 main categories:

- ▶ Publish clear, quantifiable benefits of VEEP participation for program managers
  - *“Increase the incentives to the greatest extent possible in ways that a company can measure.”*
  - *“Greater incentives to reduce some of the inspections required”*
- ▶ Communicate more about VEEP and include information in DEQ training sessions
  - *“information on the effectiveness of the program”*
  - *“how to market VEEP”*
  - *“VEEP policy information”*
  - Brown bag lunches, online training, 8-hour training, LMS class...
- ▶ Develop more reference materials and support program managers via existing tools (e.g., intranet)
  - *“Case studies with results from participants, from the perspective of the regulated community”*
  - Package of information, brochures, searchable database, more information on Internet.

### Recommendations need to address the misperceptions of program managers

- *“There is the impression that facilities who are not good to the environment get into VEEP regularly”*
- *“It’s being used primarily for marketing rather than environmental purposes.”*
- *“There is no real benefit to the businesses, more paperwork, gives them false hope that we will give them special treatment when in reality we have no authority to give them special treatment.”*
- VEEP gives *“us more things to negotiate with businesses which makes our work more complicated and less productive.”*

## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis

- ▶ In-depth Survey Analysis

- Overview
- Demographics
- Understanding
- Support
- Participation
- Information Needs
- Open-ended Questions

## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis
- ▶ In-depth Survey Analysis
  - Overview
  - Demographics
  - Understanding
  - Support
  - Participation
  - Information Needs
  - Open-ended Questions

# Demographic questions identify participant experience, influence in the organization, and potential impact on the VEEP program

## Demographic Questions

- 1. How many years have you worked for DEQ?**
  - 1 year or less
  - 2-5 years
  - 5-10 years
  - 11-20 years
  - 21+ years
- 2. Where is your primary work location**
  - Central Office
  - South Central Regional Office
  - Southwest Regional Office
  - West Central Regional Office
  - Tidewater Regional Office
  - Piedmont Regional Office
  - Valley Regional Office
  - Northern Regional Office
- 3. What is your role in the organization?**
  - Information Management
  - Enforcement
  - Environmental Enhancement
  - Senior Management
  - Regulatory/Policy Development
  - Permits and Compliance
  - Modeling
  - Environmental Monitoring
  - Other
- 4. Number of months in your current position**
  - More than 24
  - 18-24
  - 12-17
  - 6-11
  - Less than 6

# Survey questions measured understanding, support, participation, and information needs for VEEP

## Question Categories

<b>Understanding</b> (Scale: Q1-2: expert, advanced, mid-level, beginner, I don't know; Q3: (Y/N); Q4-7: Don't know/not applicable, Strongly Agree, Agree, Slightly Agree, Slightly Disagree, Disagree, Strongly Disagree)		<b>Participation</b> (Scale: Q14-19: Don't know/not applicable, Strongly Agree, Agree, Slightly Agree, Slightly Disagree, Disagree, Strongly Disagree)	
1	My understanding of Environmental Management Systems (EMS) is	14	Promoting participation in VEEP is part of my job at DEQ
2	My understanding of the Virginia Environmental Excellence Program (VEEP)	15	I actively encourage eligible facilities to participate in VEEP
3	An organization with an Environmental Management System (EMS): <ul style="list-style-type: none"> <li>• Must have an environmental policy</li> <li>• Must have at least one permit</li> <li>• Must be consistent with ISO14001</li> <li>• Must be in compliance with all applicable regulations</li> <li>• Must have measurable objectives</li> <li>• Must be consistently improving its performance</li> </ul>	16	I feel comfortable explaining the incentives and rewards available for VEEP participants
4	I have a good understanding of the criteria for participation in VEEP	17	I feel comfortable promoting VEEP to potential participants
5	I have a good understanding of the incentives and rewards available for VEEP participants	18	I feel there is more I could do to promote VEEP to potential participants
6	After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements	19	VEEP can help me meet my program goals
7	The different levels of participation in VEEP reflect increasing stringency of criteria		
8	For a facility to move from the E2 to E3 level in VEEP, it must show which of the following: <ul style="list-style-type: none"> <li>• It's compliance record has improved</li> <li>• It has an EMS in place and functioning</li> <li>• It has had an independent third party audit of its EMS</li> <li>• All of the above</li> </ul>		
<b>Support</b> (Scale: Q9-13: Don't know/not applicable, Strongly Agree, Agree, Slightly Agree, Slightly Disagree, Disagree, Strongly Disagree)		<b>Information Needs</b> (Scale: Q20: Don't know/not applicable, Strongly Agree, Agree, Slightly Agree, Slightly Disagree, Disagree, Strongly Disagree)	
9	I believe that VEEP is having a positive impact on the environment	20	I have the information and materials I need to promote VEEP to potential participants
10	Improving participation in VEEP is important to me	21	I would like to receive information about VEEP through the following (please rank top 3): <ul style="list-style-type: none"> <li>• external website</li> <li>• DEQ intranet</li> <li>• CEDS</li> <li>• A point of contact within DEQ</li> <li>• training</li> <li>• paper/poster/brochure</li> </ul>
11	The current VEEP incentives are sufficient to motivate businesses to participate in the program		
12	Increasing the number of VEEP participants will create more work for me and my staff		
13	I have significant influence over whether or not a facility is admitted into the VEEP program		



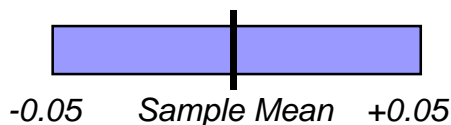
# We applied statistical analysis to confirm validity of results and identify confidence levels

## Sample size requirements are driven by:

- ▶ *Variance of variable of interest*
  - A measure of the dispersion of the variable. Variables with large variances require larger samples
- ▶ *Confidence level*
  - How certain you wish to be that the sample mean falls within a specified range of the population mean. The more certainty required, the larger sample required
- ▶ *Confidence interval*
  - The range in which you want to be X% sure that your population mean is included. The smaller the desired range, the larger the required sample

## Sample Survey Analysis Impact

The variance and number of valid responses received for each question in this survey allowed mean estimation with a 95% confidence level with a possible error of less than 0.05 for each question in this survey



**Thus, we will be 95% confident that the sample mean is within 0.05 of the true population score**

## Additional Considerations

- ▶ *Potential Response Bias*
  - Those who responded to the survey may have different feelings from those who did not. People with strong feelings are typically more likely to respond to surveys
- ▶ *Mitigation Strategy*
  - Additional attempts may be made to survey non-respondents. However, the already received suggests clear trends in overall response

## Example

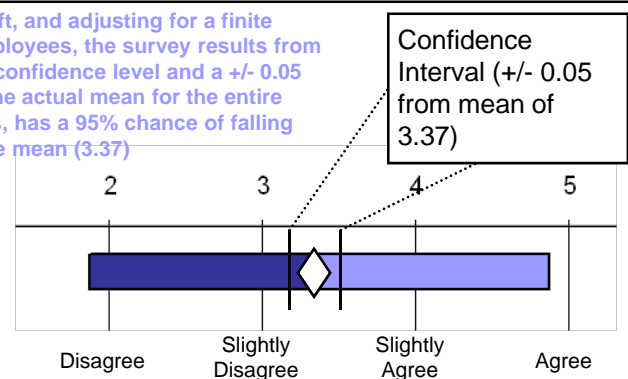
### Question

1. I have a good understanding of the reward and recognition programs that exist within my organization.

$$n = \left[ \frac{z_{\alpha/2} \sigma}{E} \right]^2$$

Responses	120
Sample Mean	3.37
Sample St.. Dev	1.5

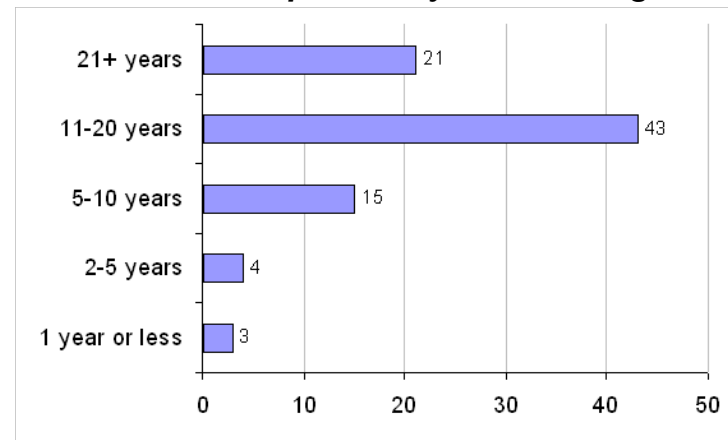
Using the formula to the left, and adjusting for a finite population of only 197 employees, the survey results from 120 responses has a 95% confidence level and a +/- 0.05 confidence interval. i.e., the actual mean for the entire population, 197 employees, has a 95% chance of falling between 0.05 of the sample mean (3.37)



## 81% of eligible managers responded to the VEEP survey; respondents represent a wide array of roles, regions and experience at DEQ

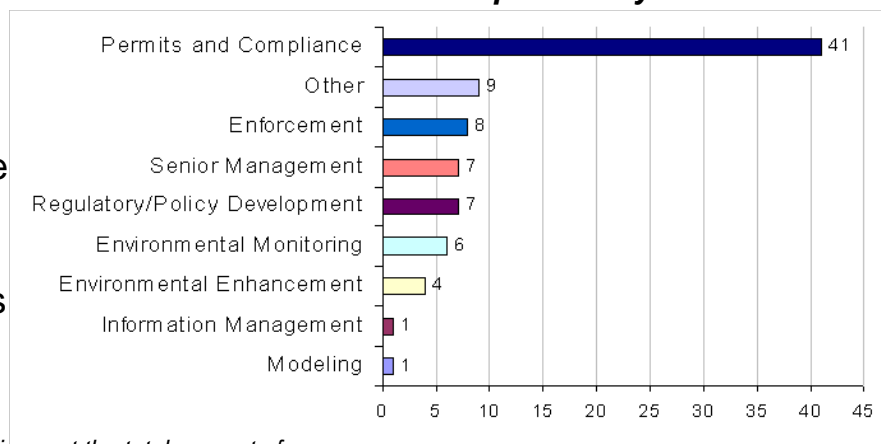
- ▶ 81% (87/108) of eligible managers responded to the VEEP survey
- ▶ 74% (64/87) of respondents have been with DEQ for 11+ years
- ▶ 69% (60/87) of respondents have worked in their current position for 24+ months

**Breakdown of Responses by Years w/ Organization**



- ▶ 47% (41/87) of respondents work with Permits and Compliance
- ▶ 39% (33/84\*) of respondents are located in the central office; 61% (51/84\*) of respondents are located in regional offices
- ▶ Responses are comprehensive offering a cross section of DEQ roles and responsibilities

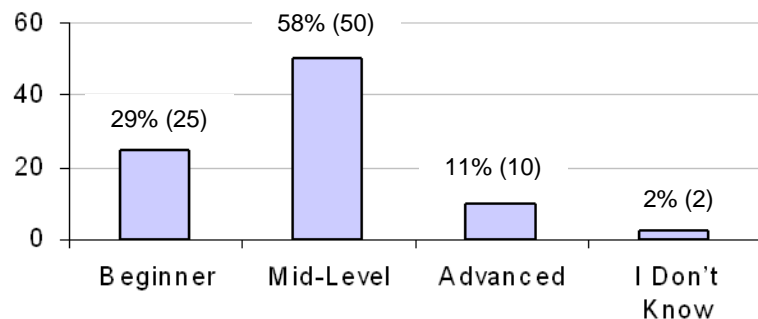
**Breakdown of Responses by Role**



\* Denominators used in survey results are the number of respondents to the question, not the total amount of responses

## 8 of 24 questions gauged managers on their knowledge of Environmental Management Systems and VEEP requirements

My understanding of the Virginia Environmental Excellence Program (VEEP): *(Rate from Beginner to Advanced)*



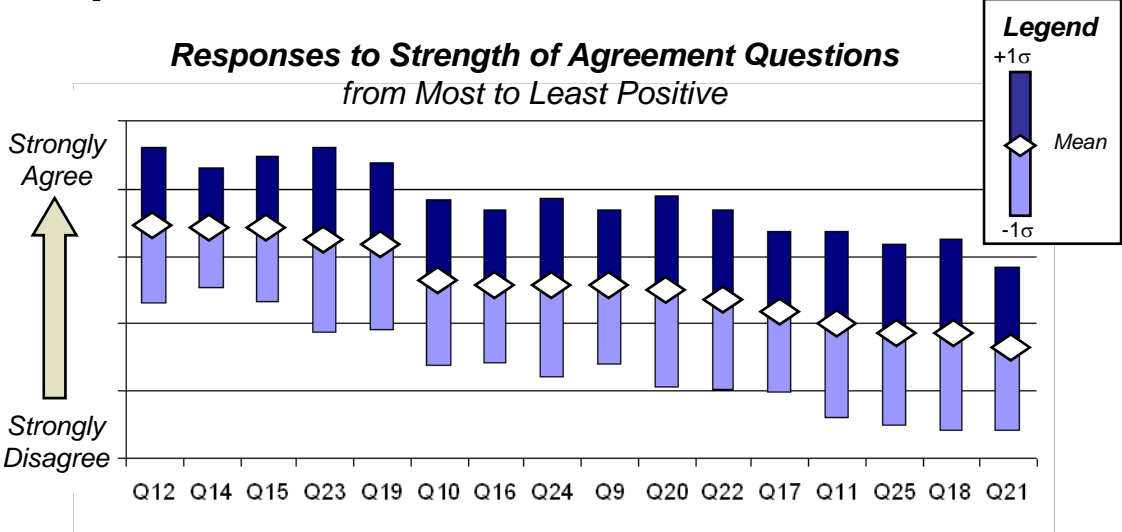
### Key Observations

- ▶ ~67% of respondents demonstrated a basic understanding of VEEP and E2-E4 levels
- ▶ ~37% of respondents falsely believe that VEEP participants are able to reduce their compliance requirements
- ▶ ~40% of respondents demonstrated a moderate level of understanding when answering Q3

### Question Guide

Q1	My understanding of the Environmental Management Systems (EMS) is: <i>(Rate from Beginner to Advanced)</i>	Q5	I have a good understanding of the incentives and rewards available for VEEP participants <i>(Rate from Strongly Disagree to Strongly Agree)</i>
Q2	My understanding of the Virginia Environmental Excellence Program (VEEP): <i>(Rate from Beginner to Advanced)</i>	Q6	After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements <i>(Rate from Strongly Disagree to Strongly Agree)</i>
Q3	<i>(Yes/No/Not Sure)</i> 3a: An organization with an EMS must have an environmental policy 3b: An organization with an EMS must have at least one permit 3c: An organization with an EMS must be consistent with ISO 14001 3d: An organization with an EMS must be in compliance with all applicable regulations 3e: An organization with an EMS must have measurable objectives 3f: An organization with an EMS must be consistently improving its performance	Q7	The compliance criteria for participation in VEEP is different at each level <i>(Rate from Strongly Disagree to Strongly Agree)</i>
Q4	I have a good understanding of the criteria for participation in VEEP <i>(Rate from Strongly Disagree to Strongly Agree)</i>	Q8	For a facility to move from the E2 to E3 level in VEEP, it must show which of the following: -It's compliance record has improved -It has an EMS in place and functioning (Right Answer) -It has had an independent third party audit of its EMS -All of the above

# 16 of 24 questions gauged managers on their knowledge of VEEP using a six point scale



## Key Observations

- ▶ ~60% of respondents indicated that they actively encourage facilities to participate in VEEP
- ▶ ~60% of respondents believe that VEEP's incentives are sufficient to motivate businesses to participate in the program, ~40% do not
- ▶ ~67% of respondents are not comfortable explaining VEEP rewards and incentives

Question Guide			
Q12	The compliance criteria for participation in VEEP is different at each level	Q9	I have a good understanding of the criteria for participation in VEEP
Q14	I believe that VEEP is having a positive impact on the environment	Q20	I actively encourage eligible facilities to participate in VEEP
Q15	Improving participation in VEEP is important to me	Q22	I feel comfortable promoting VEEP to potential participants
Q23	I feel there is more I could do to promote VEEP to potential participants	Q17	Increasing the number of VEEP participants will create more work for me and my staff
Q19	Promoting participation in VEEP is part of my job at DEQ	Q11	After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements
Q10	I have a good understanding of the incentives and rewards available for VEEP participants	Q25	I have the information and materials I need to promote VEEP to potential participants
Q16	The current VEEP incentives are sufficient to motivate businesses to participate in the program	Q18	I have significant influence over whether or not a facility is admitted into the VEEP program
Q24	VEEP can help me meet my program goals	Q21	I feel comfortable explaining the incentives and rewards available for VEEP participants

# Open-ended comments reinforce a need for additional training, promotion and information in order to improve support and participation in VEEP

## Q22: What training or information could you or your staff use to help better promote the VEEP?

- ▶ Information – at many levels, including basic, detailed, and more targeted to apply to specific customers/situations
- ▶ Training
- ▶ Printed materials to promote VEEP
- ▶ Regular communication/updates on VEEP
- ▶ Case Studies
- ▶ Technology

### Sample Comments

- “Updated information on the effectiveness of the program would be helpful”
- “Real examples of VEEP benefits”
- “What it is, who it applies to, how it works, and benefits for the regulated community and environment”
- “Brochures we can send out on request”
- “Program overview with emphasis on the media that individuals are associated with”
- “Brown bag lunches on this and other programs, e.g. “Program of the Quarter”
- “Searchable database with existing site information including addresses”

## Q23: What reasons do you think businesses have for not participating in VEEP?

- ▶ Resources/Cost too high
- ▶ Lack of awareness
- ▶ Unclear benefits
- ▶ Fear of increasing DEQ scrutiny/attention
- ▶ Non compliance issues

### Sample Comments

- “Perceived cost v. benefit”
- “Fear of additional paperwork/work in general”
- “Too much work for too few incentives”
- “Unclear what is in it for them”
- “Reduced reporting requirements and limited liability may not be strong enough incentives”
- “Afraid it is another way for regulators to know more about their business”
- “It puts them on our radar screen”

## Q24: How would you improve the VEEP (include any specific ideas)?

- ▶ Provide better/clearer incentives
- ▶ Increase marketing/promotion of VEEP
- ▶ Provide more staff support and training
- ▶ Produce printed materials
- ▶ Better customer support and training
- ▶ Improve program requirements
- ▶ Support with technology

### Sample Comments

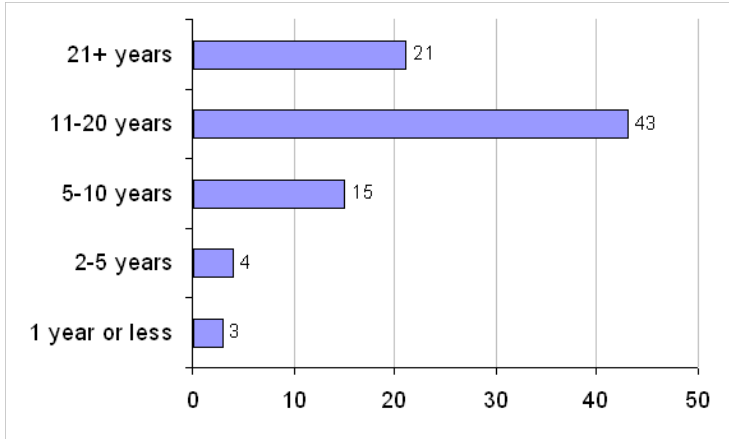
- “Staff and business community training”
- “Easy to read and understand literature for internal and external use”
- “Come up with tangible incentives for companies to participate”
- “Make it more meaningful with bigger fanfare”
- “Promote incentives”
- “Target materials by sector or program to help explain and sell the program better”
- “There is the impression that facilities who are not good to the environment get into VEEP regularly”
- “Provide web-based permitting”

## Table of Contents

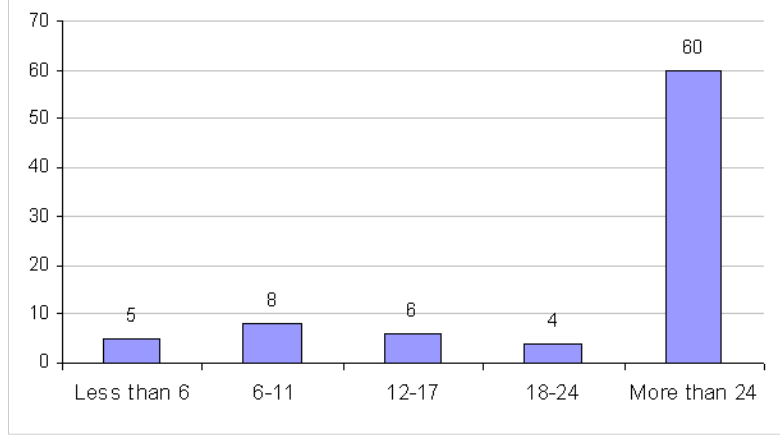
- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis
- ▶ In-depth Survey Analysis
  - Overview
  - Demographics
  - Understanding
  - Support
  - Participation
  - Information Needs
  - Open-ended Questions

# The survey received an 81% response rate, demographics indicate responses were received from a variety of roles, regions and experience

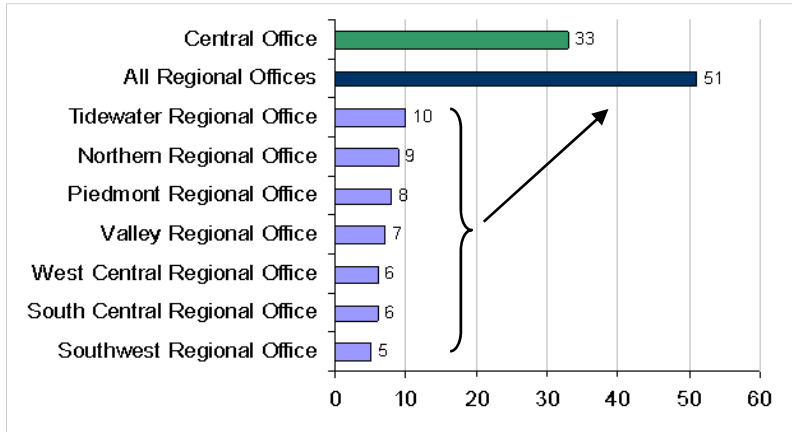
*Breakdown of Responses by Years w/ Organization*



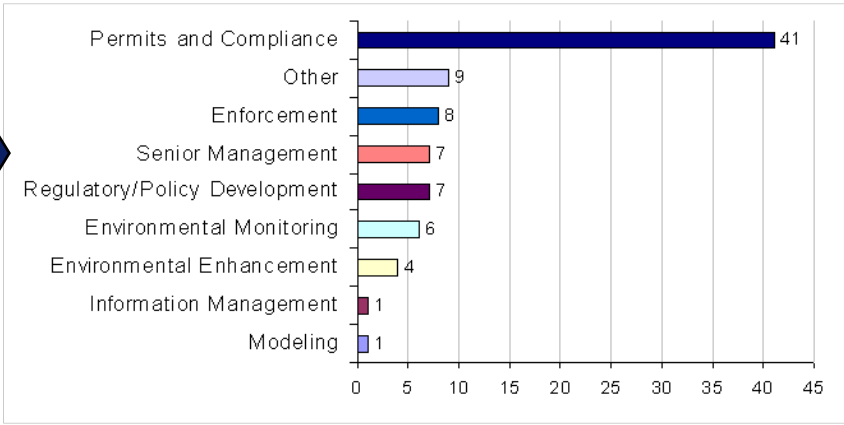
*Breakdown of Responses by Months in Current Position*



*Breakdown of Responses by Office*



*Breakdown of Responses by Role*



## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis
- ▶ In-depth Survey Analysis
  - Overview
  - Demographics
  - Understanding
  - Support
  - Participation
  - Information Needs
  - Open-ended Questions

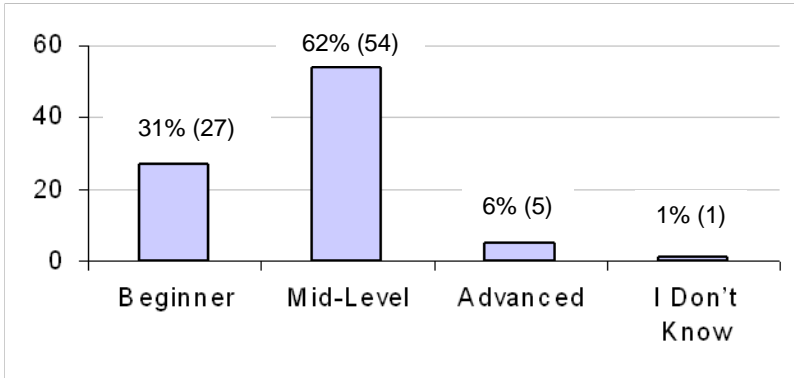


# Results show a moderate to low understanding of VEEP among DEQ managers

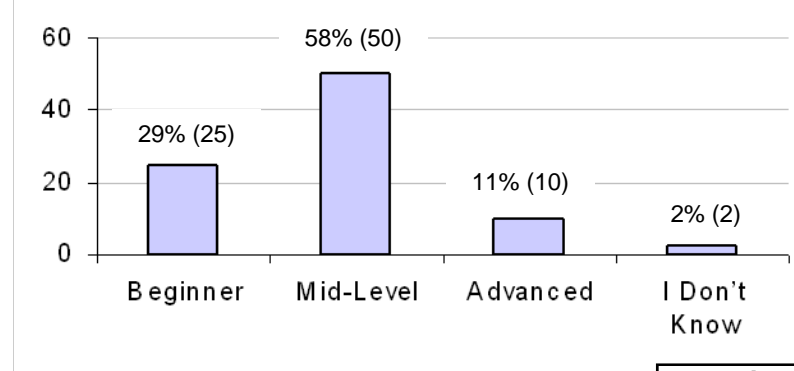
## Key Observations

- DEQ has few managers with an advanced understanding of Environmental Management Systems (EMS) and the Virginia Environmental Excellence Program. Many managers ranked themselves as *beginner* or *mid-level*
- ~37% of respondents falsely believe that VEEP participants are able to reduce their compliance requirements

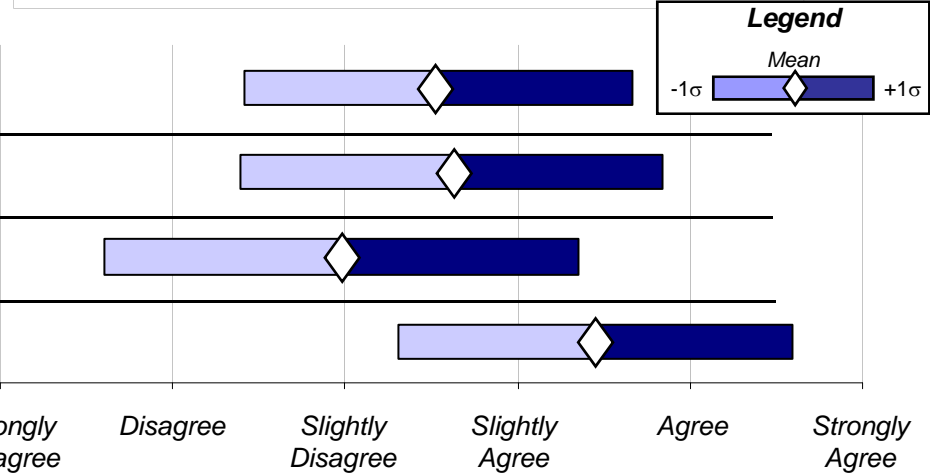
1 My understanding of the Environmental Management Systems (EMS) is: (Rate from Beginner to Advanced)



2 My understanding of the Virginia Environmental Excellence Program (VEEP): (Rate from Beginner to Advanced)



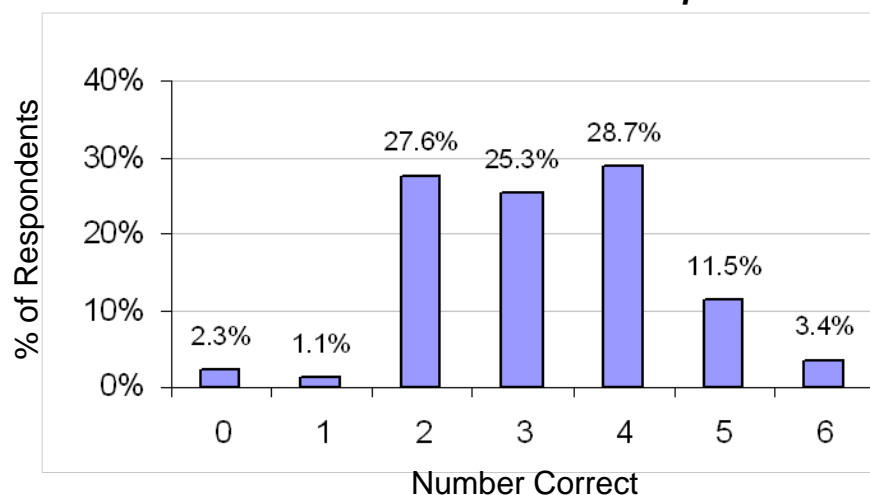
4	I have a good understanding of the criteria for participation in VEEP (Rate from Strongly Disagree to Strongly Agree)
5	I have a good understanding of the incentives and rewards available for VEEP participants (Rate from Strongly Disagree to Strongly Agree)
6	After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements (Rate from Strongly Disagree to Strongly Agree)
7	The compliance criteria for participation in VEEP is different at each level (Rate from Strongly Disagree to Strongly Agree)



## The survey tested knowledge of Environmental Management Systems; results support a low to moderate level of understanding among respondents

		Yes	No	Don't Know
3a	An organization with an EMS must have an environmental policy <i>(Yes/No/Not Sure)</i>	79	4	4
3b	An organization with an EMS must have at least one permit <i>(Yes/No/Not Sure)</i>	11	60	16
3c	An organization with an EMS must be consistent with ISO 14001 <i>(Yes/No/Not Sure)</i>	36	26	25
3d	An organization with an EMS must be in compliance with all applicable regulations <i>(Yes/No/Not Sure)</i>	50	30	6
3e	An organization with an EMS must have measurable objectives <i>(Yes/No/Not Sure)</i>	80	0	3
3f	An organization with an EMS must be consistently improving its performance <i>(Yes/No/Not Sure)</i>	67	5	15

**Breakdown of Number of Correct Responses**



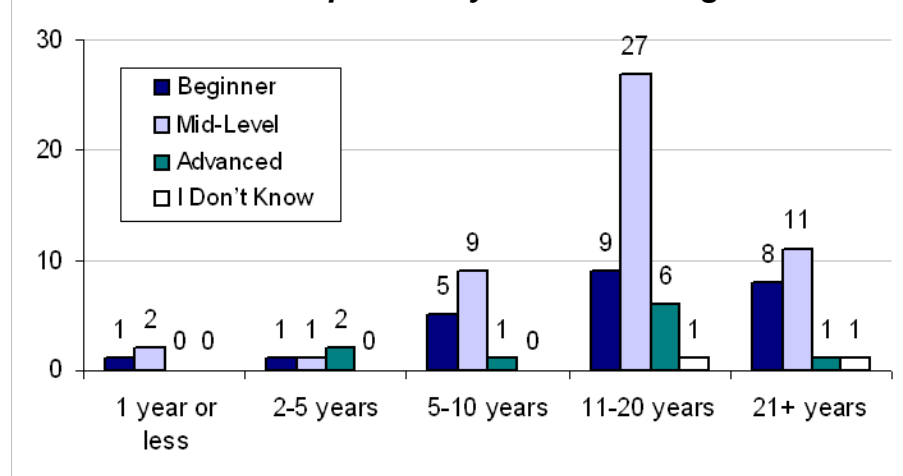
### Key Observations

- Less than 10% of respondents answered 6 of 6 questions correctly exhibiting a clear understanding EMS
- ~40% of respondents answered 4 or 5 of 6 questions correctly demonstrating a moderate level of understanding
- ~53% of respondents answered 2 or 3 of 6 questions correctly demonstrating a low level of understanding

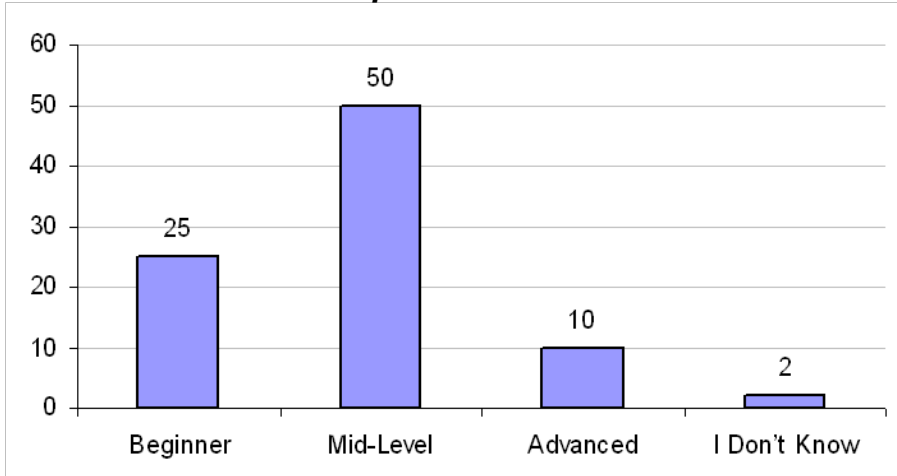
# Respondents indicated that they have a moderate understanding of EMS

Question 1: My understanding of EMS is:

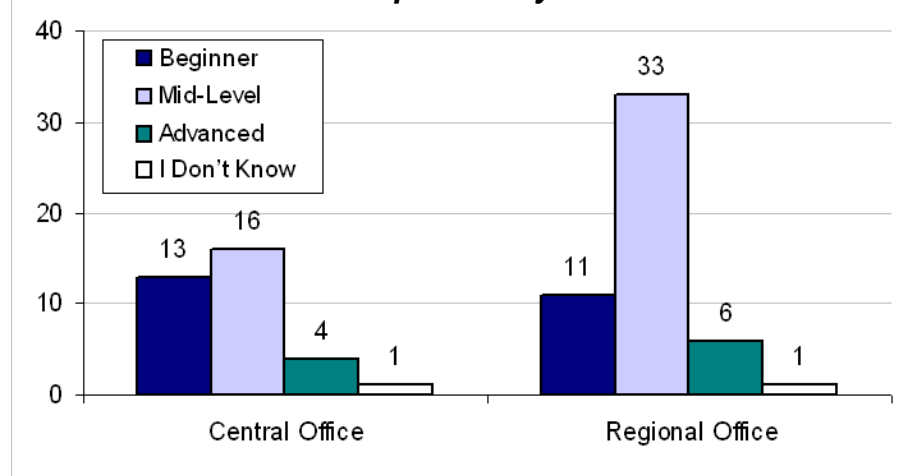
Breakdown of Responses by Years with Organization



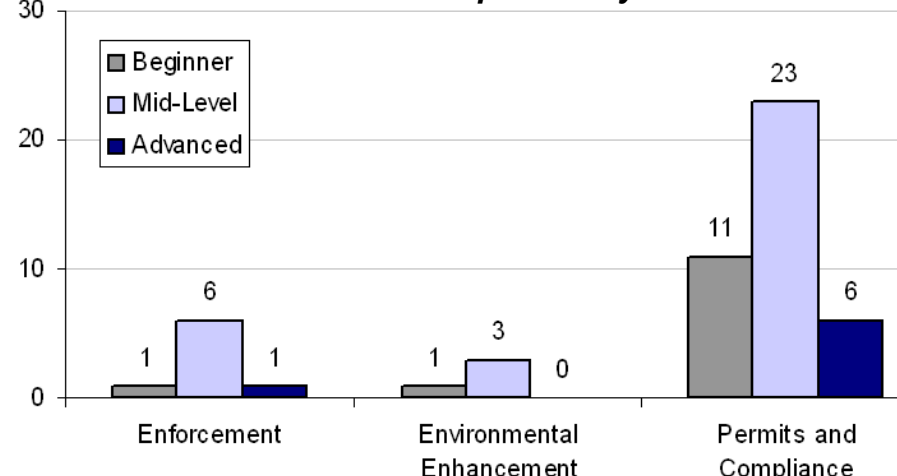
Responses Overall



Breakdown of Responses by Office Location



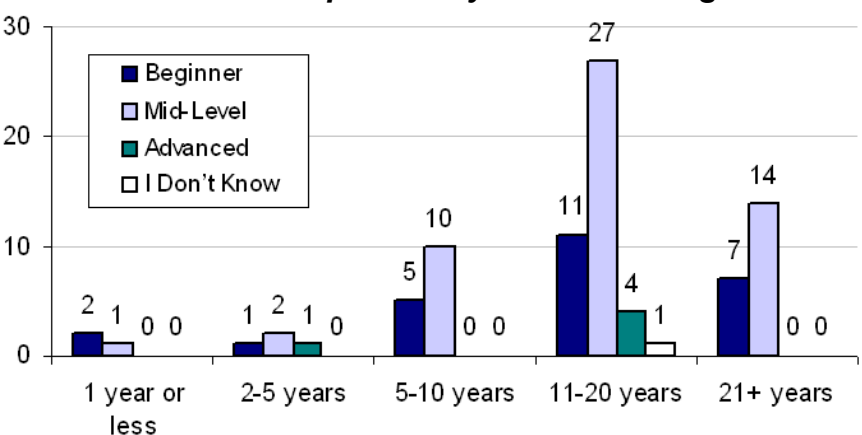
Breakdown of Responses by Work Area



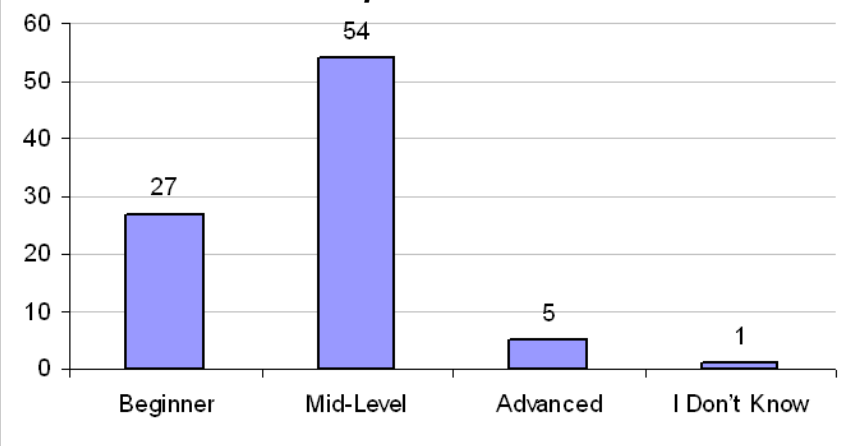
# Respondents feel as though they have a moderate understanding of VEEP, analysis indicates that this is consistent across all groups

## Question 2: My understanding of VEEP is:

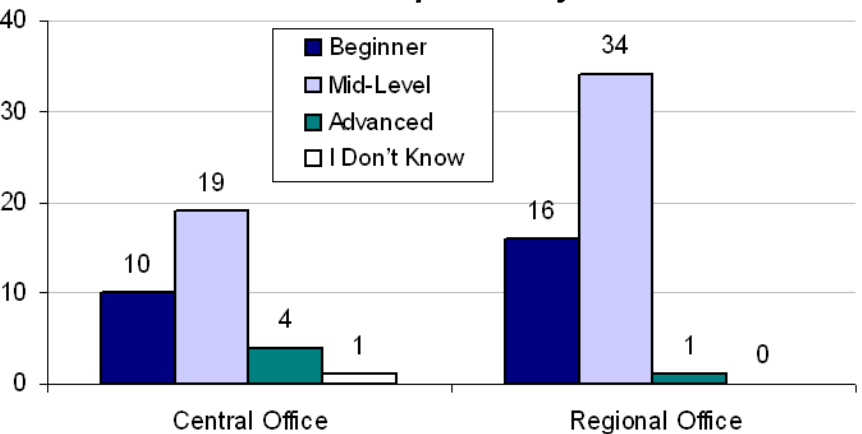
Breakdown of Responses by Years with Organization



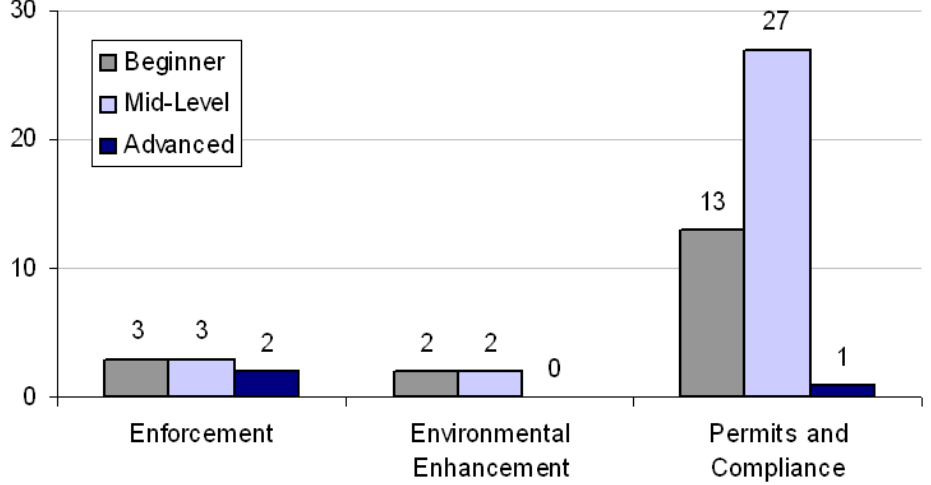
Responses Overall



Breakdown of Responses by Office Location



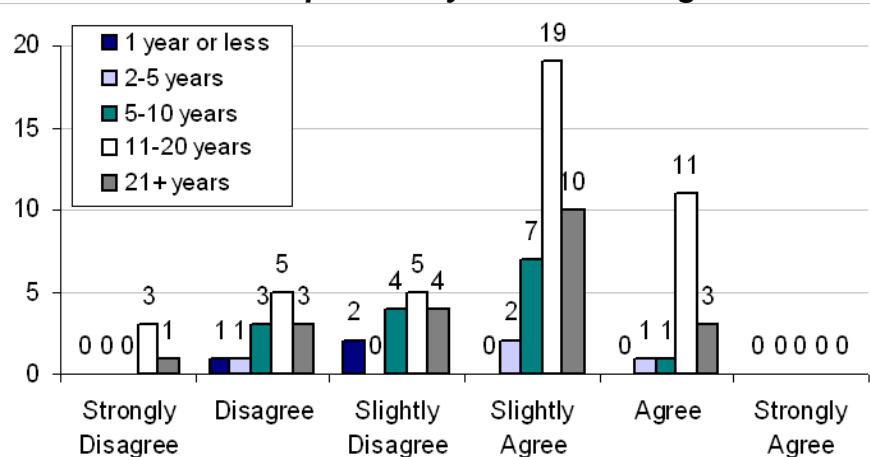
Breakdown of Responses by Work Area



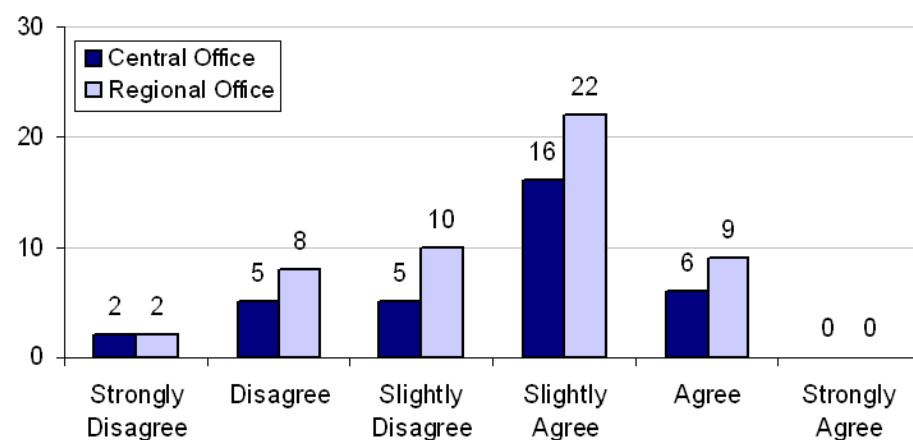
~62% of respondents acknowledged that they understand the criteria for participation in VEEP, ~38% did not

**Question 4: I have a good understanding of the criteria for participation in VEEP**

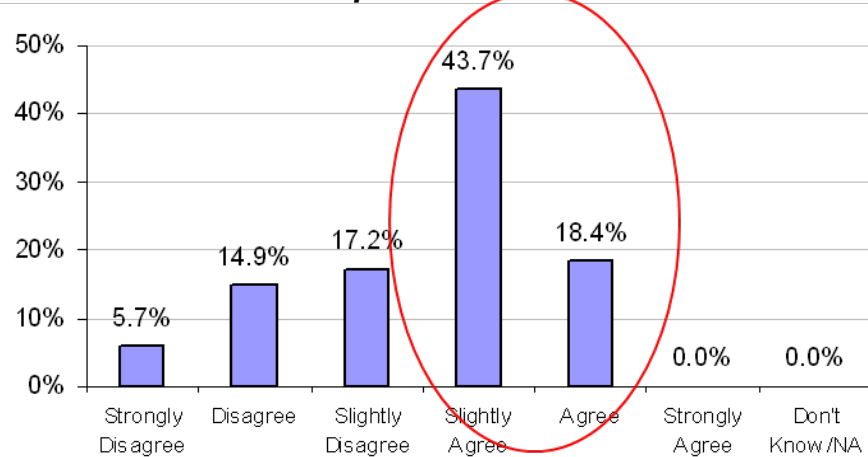
**Breakdown of Responses by Years with Organization**



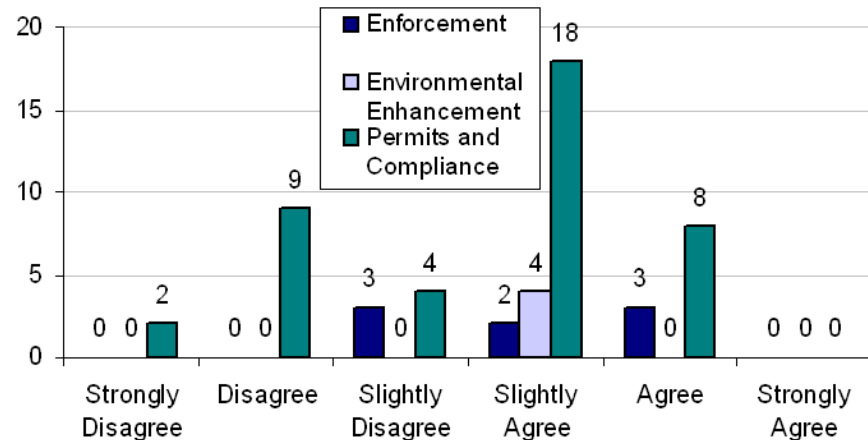
**Breakdown of Responses by Office Location**



**Responses Overall**



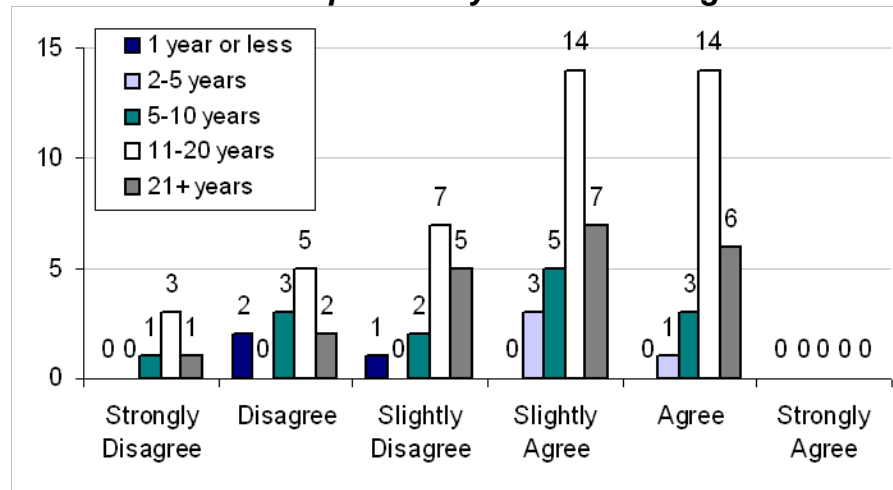
**Breakdown of Responses by Work Area**



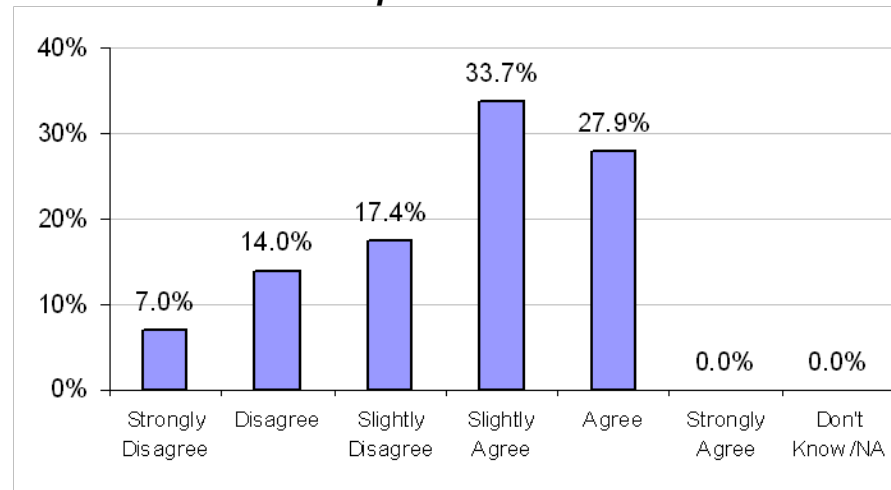
# ~62% of respondents feel as though they understand VEEP's incentive program

Question 5: I have a good understanding of the incentives and rewards available for VEEP participants:

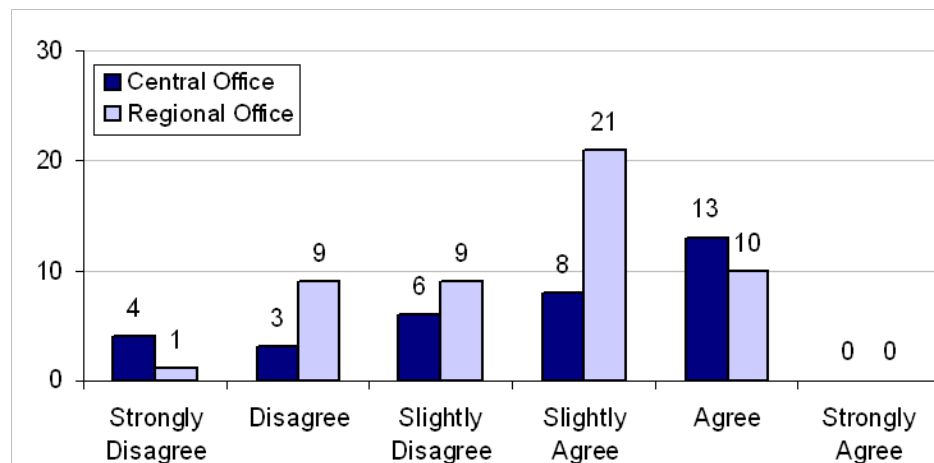
**Breakdown of Responses by Years with Organization**



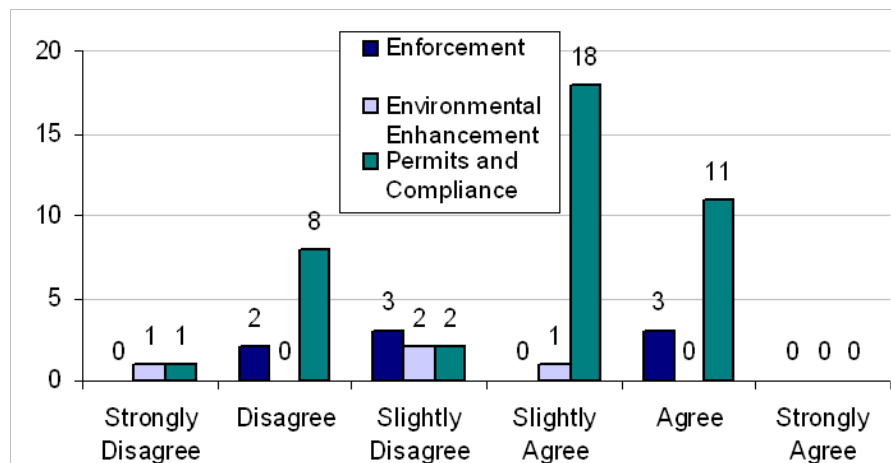
**Responses Overall**



**Breakdown of Responses by Office Location**



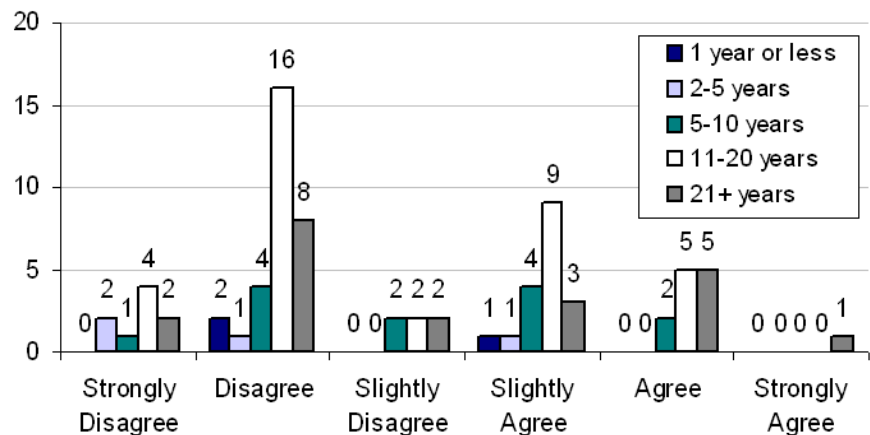
**Breakdown of Responses by Work Area**



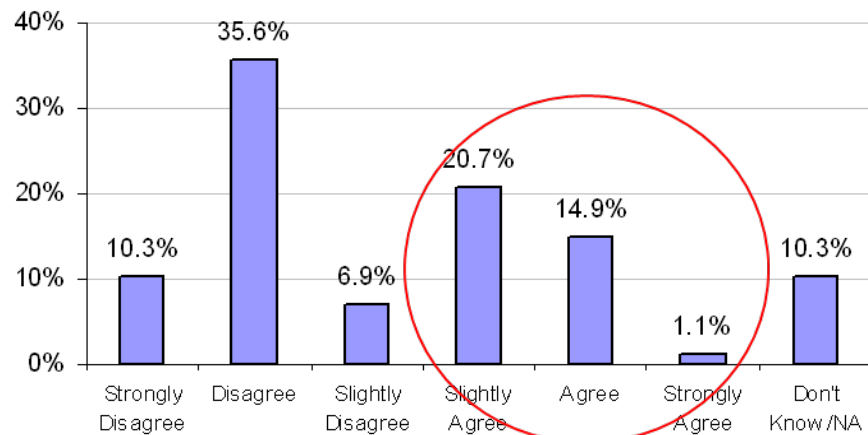
# ~37% of respondents falsely believe that VEEP participants are able to reduce their compliance requirements

Question 6: After a participant is admitted into VEEP, it is our policy to reduce their compliance requirements

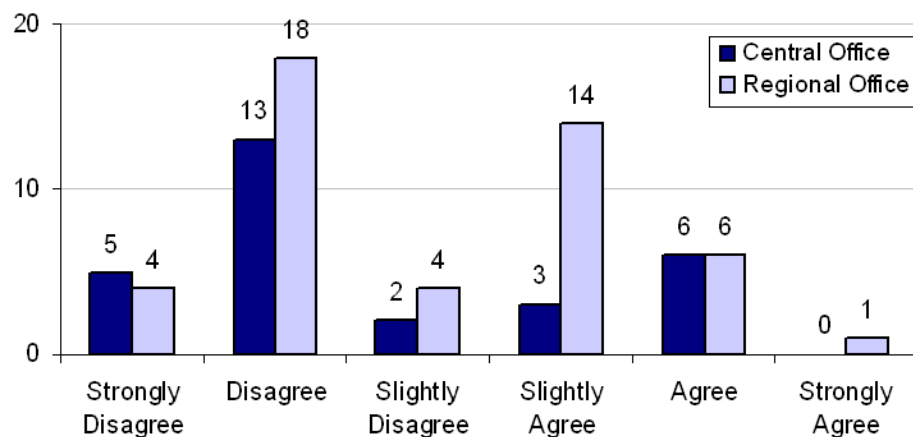
**Breakdown of Responses by Years with Organization**



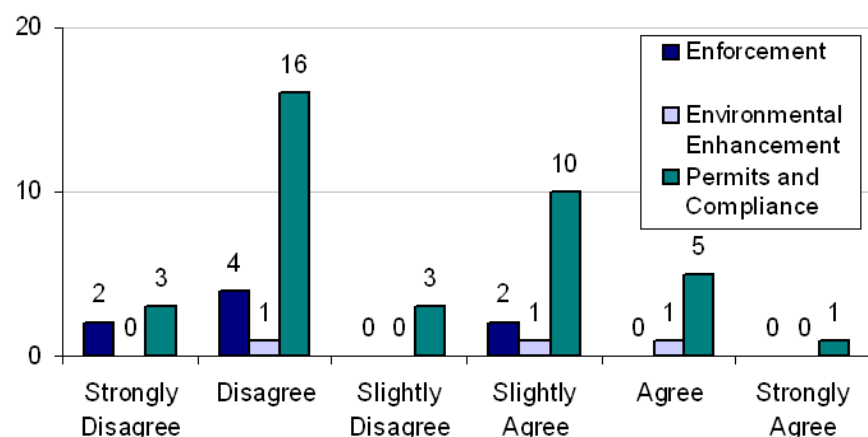
**Responses Overall**



**Breakdown of Responses by Office Location**



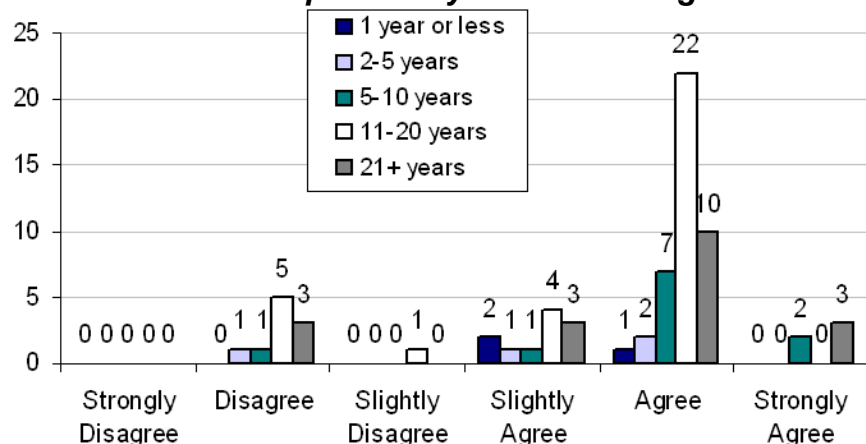
**Breakdown of Responses by Work Area**



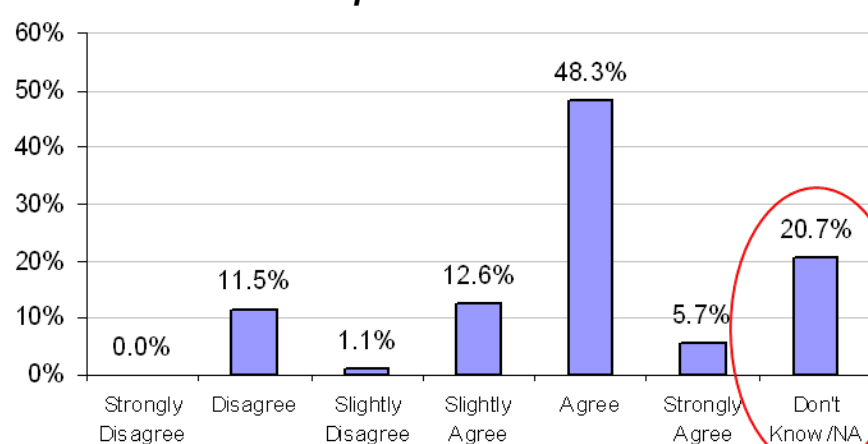
~67% of respondents demonstrated a basic understanding of VEEP and E2-E4 levels, notably 20% of respondents did not know

Question 7: The compliance criteria for participation in VEEP is different at each level

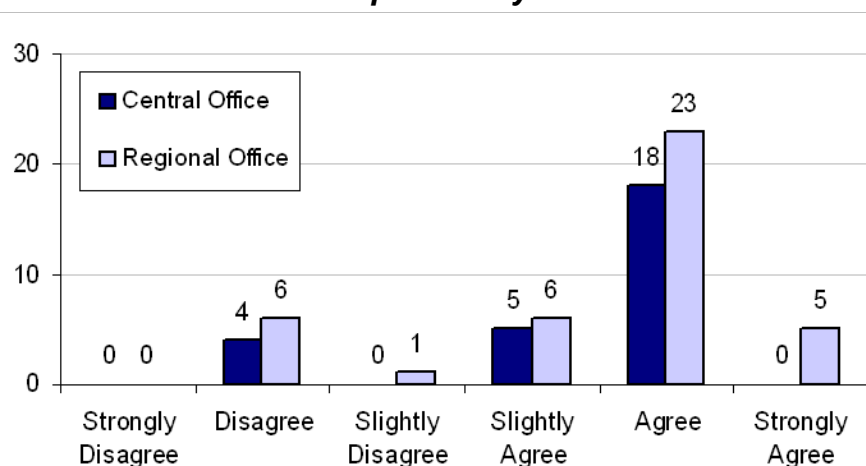
Breakdown of Responses by Years with Organization



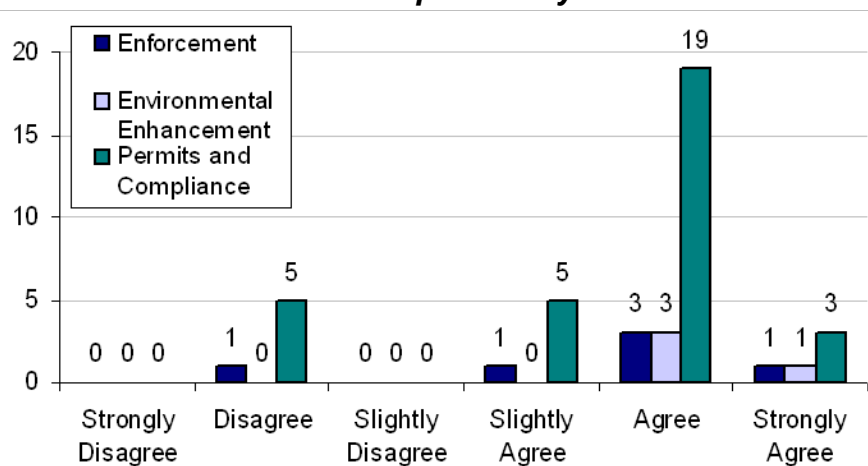
Responses Overall



Breakdown of Responses by Office Location



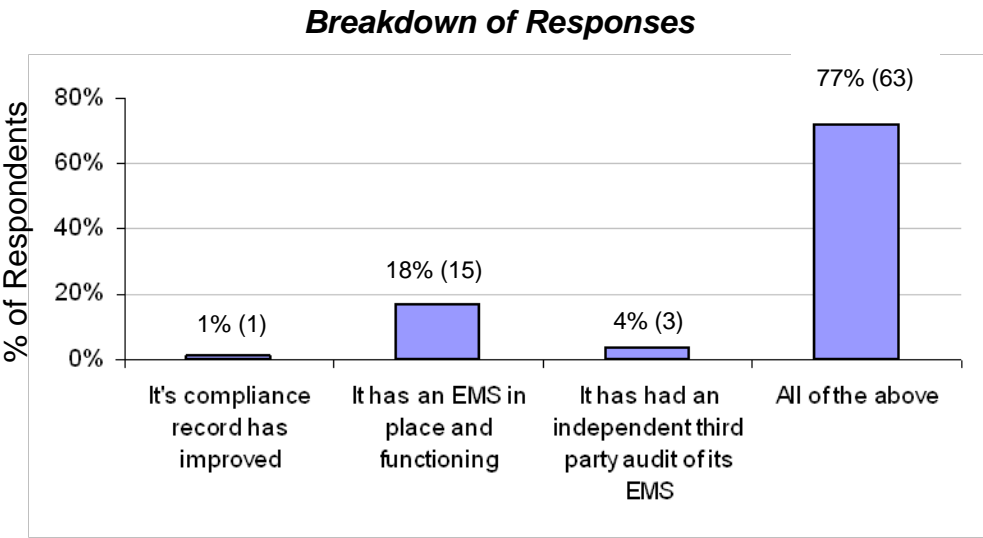
Breakdown of Responses by Work Area





# The survey assessed respondents knowledge of VEEP; ~18% of respondents correctly identified what is needed in order to move from E2 to E3

		Correct	Incorrect
8	For a facility to move from the E2 to E3 level in VEEP, it must show which of the following: <ul style="list-style-type: none"> <li>It's compliance record has improved</li> <li>It has an EMS in place and functioning (Right Answer)</li> <li>It has had an independent third party audit of its EMS</li> <li>All of the above</li> </ul>	15	67



**Key Observations**

- 18% of respondents answered correctly
- 82% of respondents answered incorrectly indicating a low level of VEEP awareness among a majority of respondents

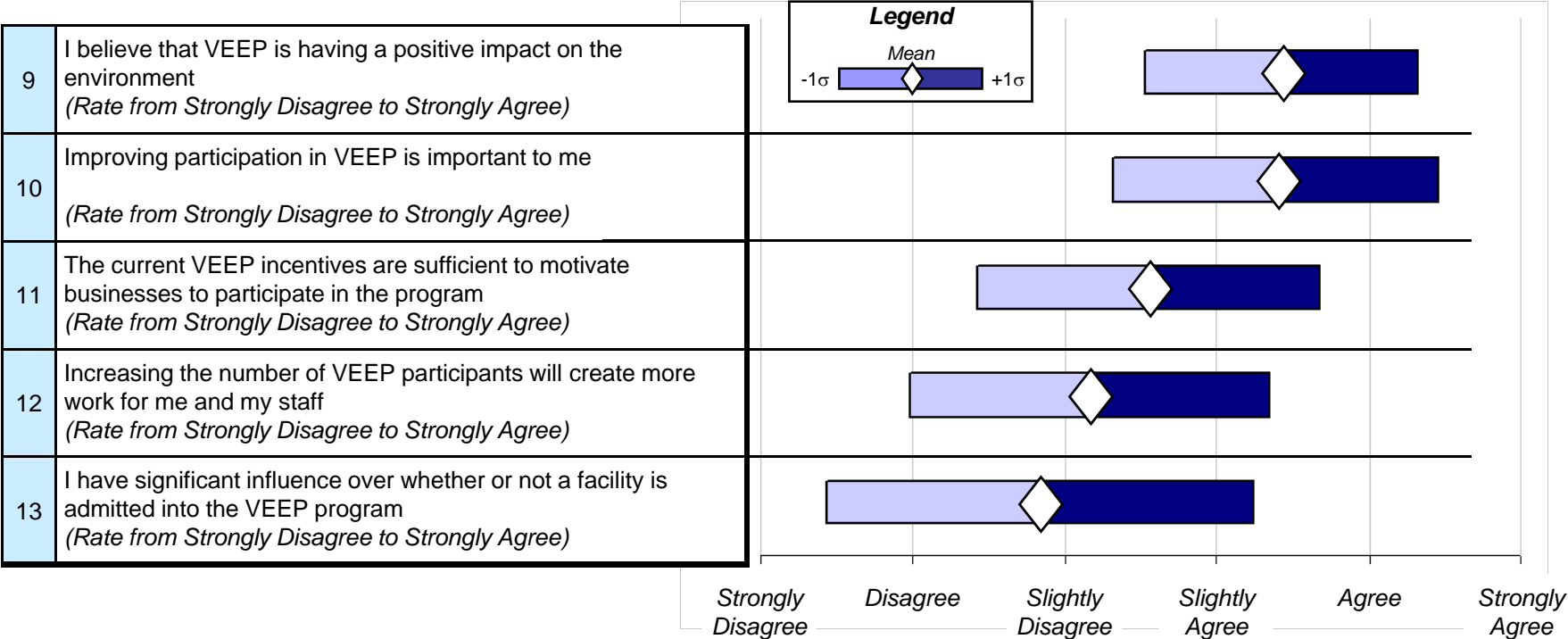
## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis
- ▶ In-depth Survey Analysis
  - Overview
  - Demographics
  - Understanding
  - Support
  - Participation
  - Information Needs
  - Open-ended Questions

# Respondents believe VEEP participation is important and has a positive impact on the environment

## Key Observations

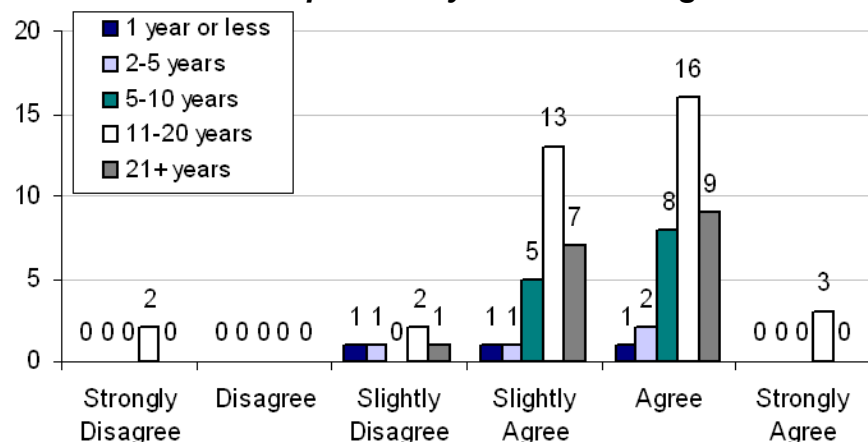
- ~86% of respondents believe VEEP has a positive impact on the environment
- ~88% of respondents identify VEEP participation as important
- A notable amount (40%) of responses indicate that managers feel as though rewards and incentives are not sufficient



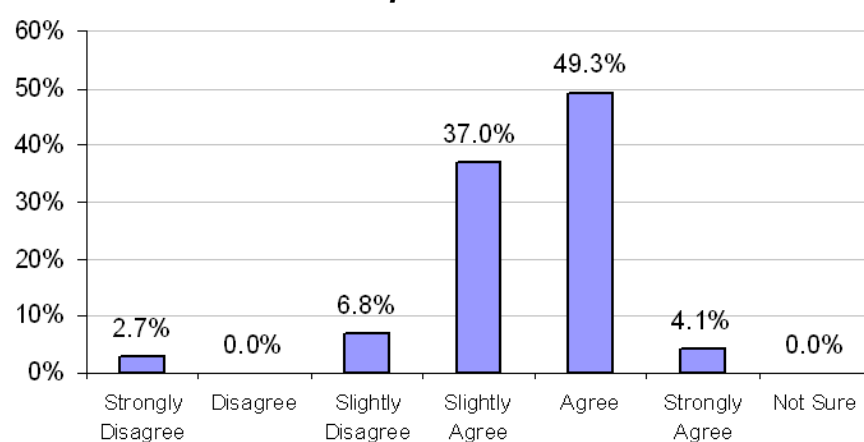
# ~86% of respondents believe VEEP has a positive impact on the environment

## Question 9: I believe that VEEP is having a positive impact on the environment

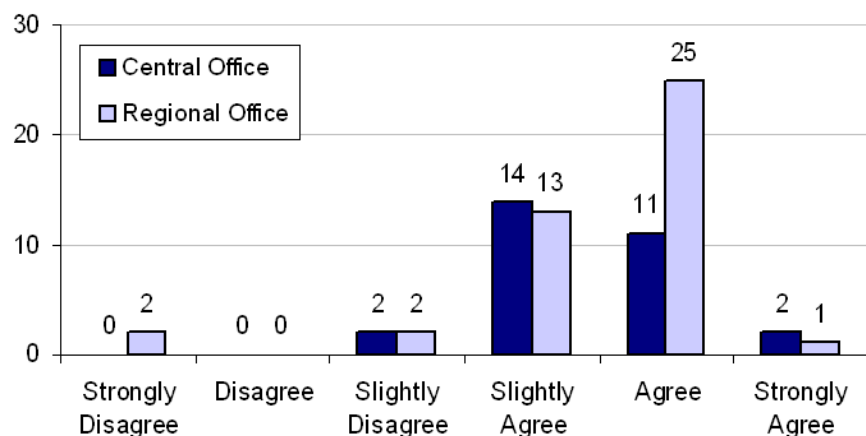
**Breakdown of Responses by Years with Organization**



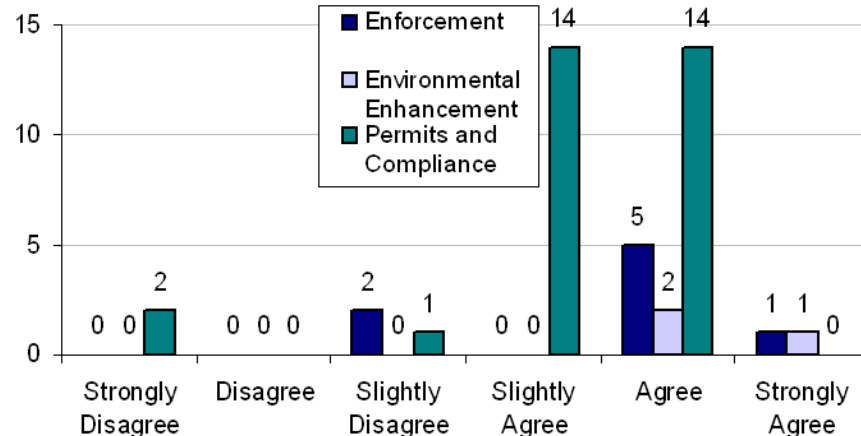
**Responses Overall**



**Breakdown of Responses by Office Location**



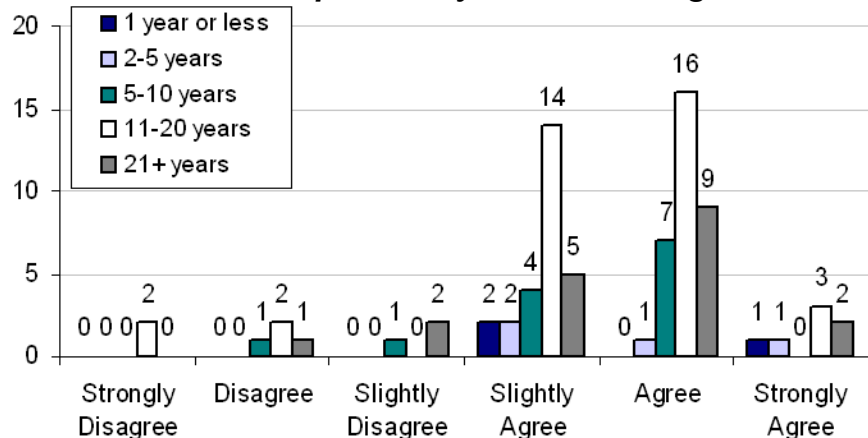
**Breakdown of Responses by Work Area**



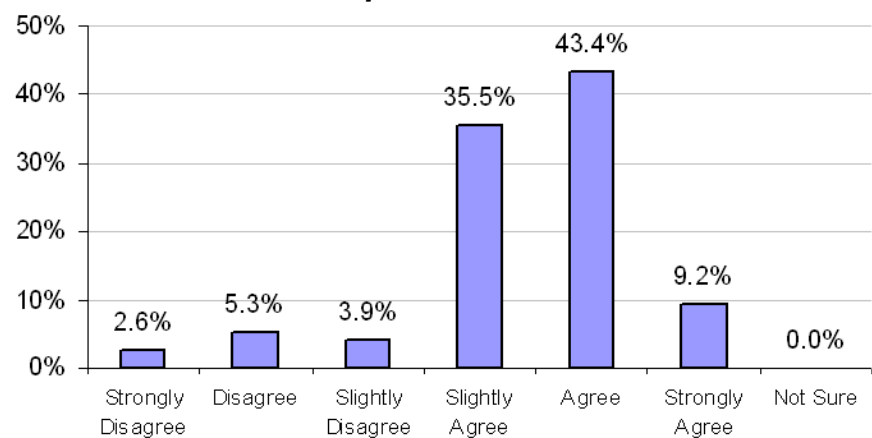
# ~88% of respondents identify VEEP participation as important

## Question 10: Improving participation in VEEP is important to me

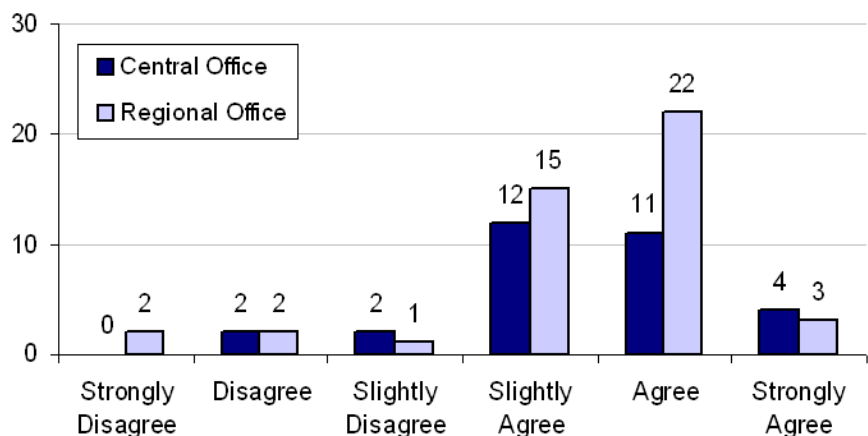
**Breakdown of Responses by Years with Organization**



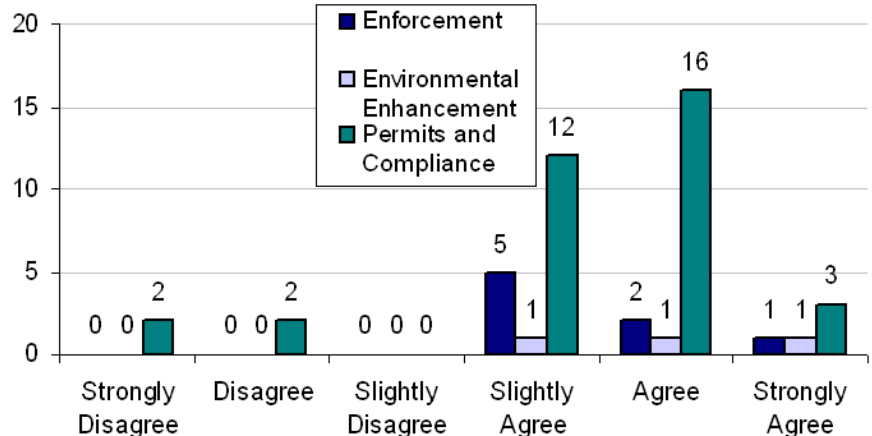
**Responses Overall**



**Breakdown of Responses by Office Location**



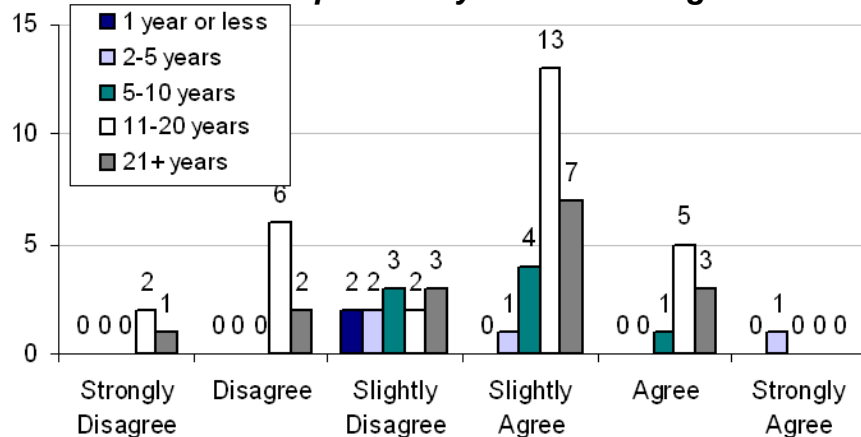
**Breakdown of Responses by Work Area**



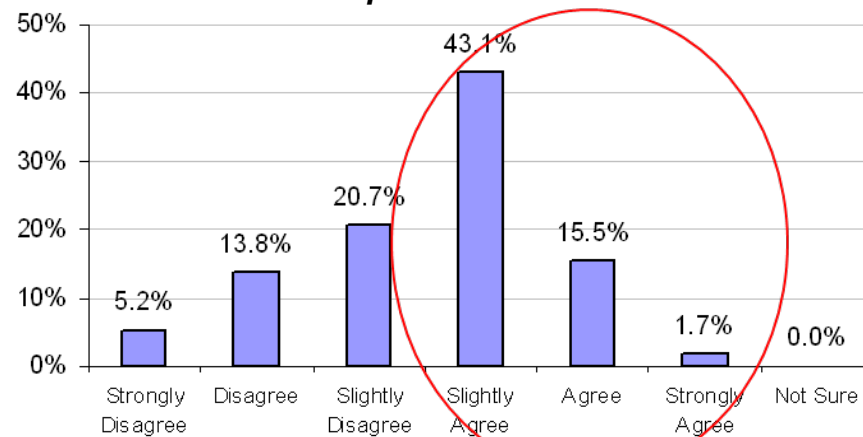
~60% of respondents believe that VEEP's incentives are sufficient to motivate businesses to participate in the program, ~40% do not

**Question 11: The current VEEP incentives are sufficient to motivate businesses to participate in the program**

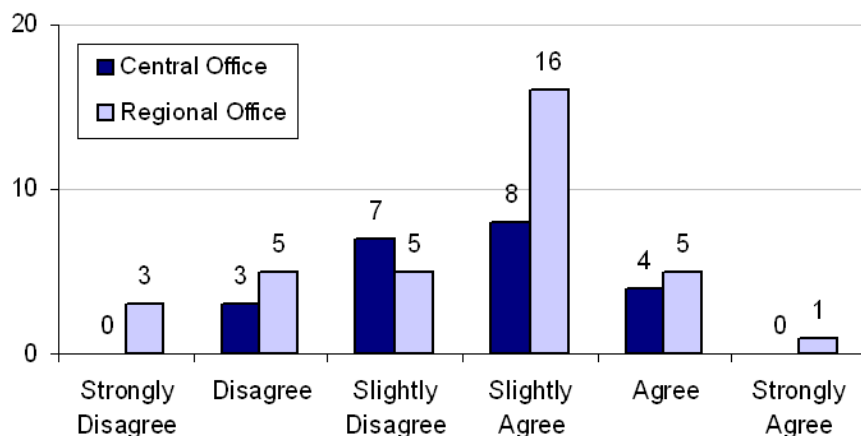
**Breakdown of Responses by Years with Organization**



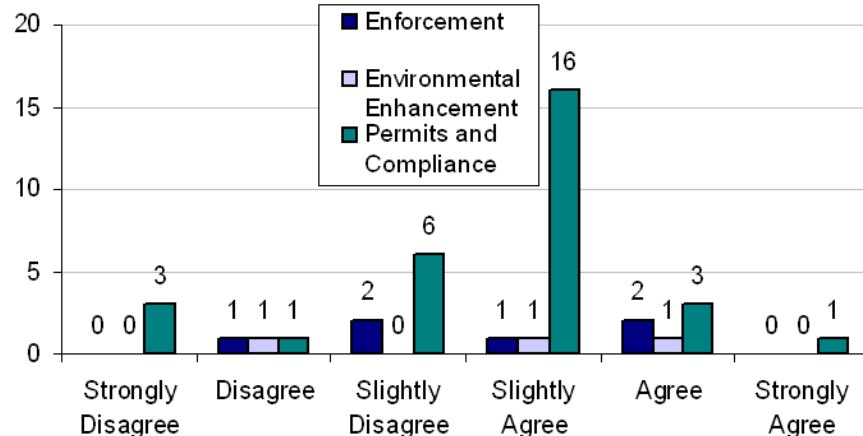
**Responses Overall**



**Breakdown of Responses by Office Location**



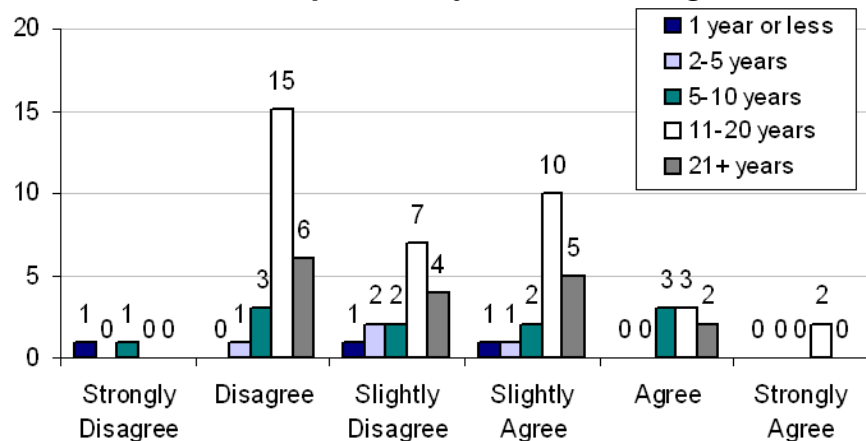
**Breakdown of Responses by Work Area**



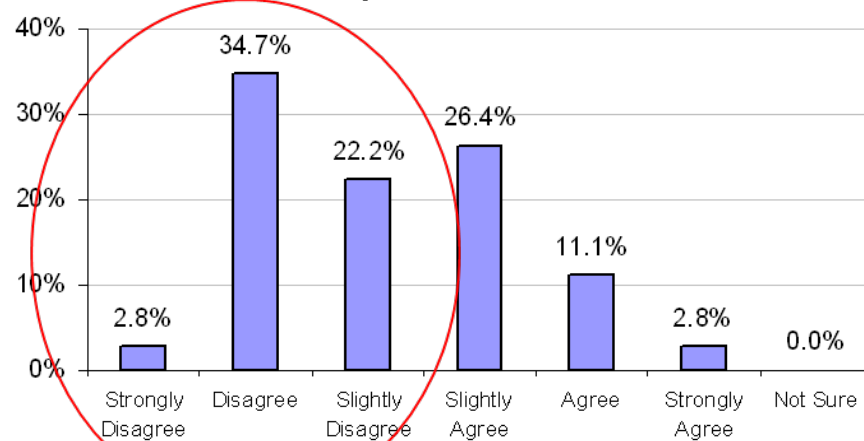
~60% of respondents believe that more VEEP participants will not lead to an increase in workloads

**Question 12: Increasing the number of VEEP participants will create more work for me and my staff**

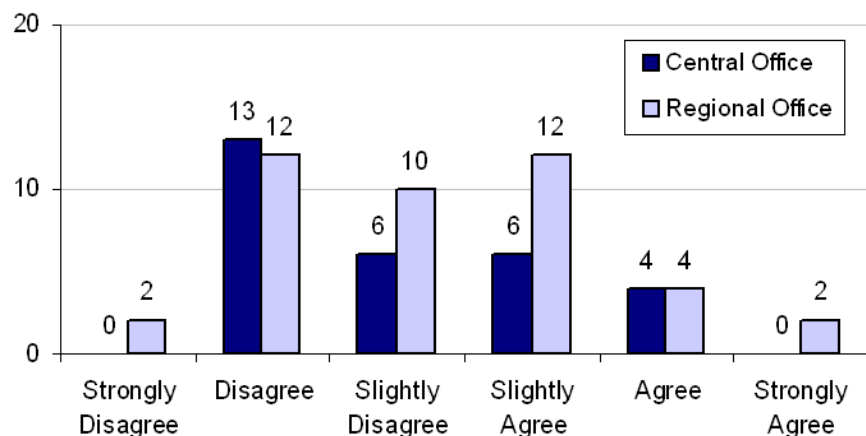
**Breakdown of Responses by Years with Organization**



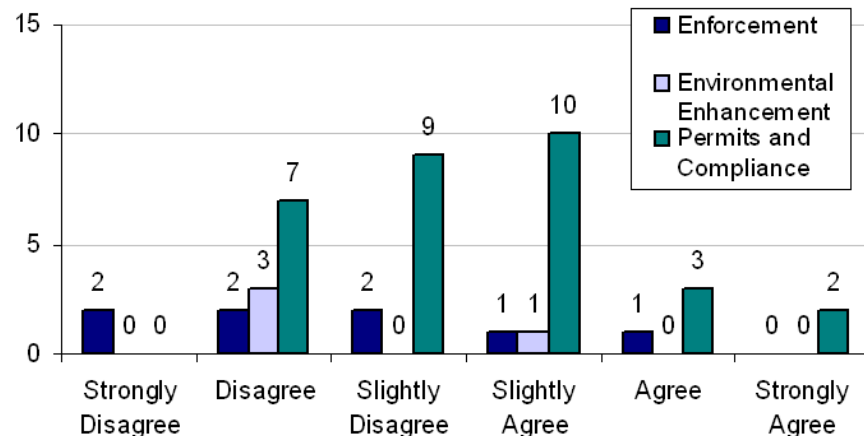
**Responses Overall**



**Breakdown of Responses by Office Location**



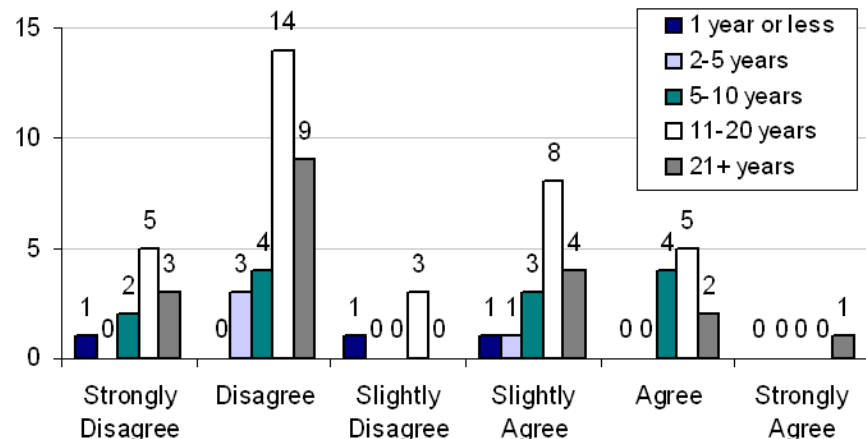
**Breakdown of Responses by Work Area**



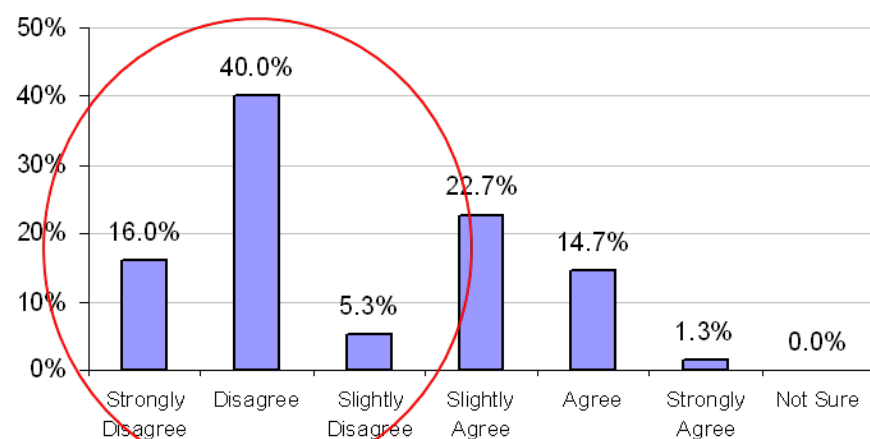
~61% do not believe they have influence over admission into the VEEP program, this is consistent among central and regional managers

Question 13: I have significant influence over whether or not a facility is admitted into the VEEP program

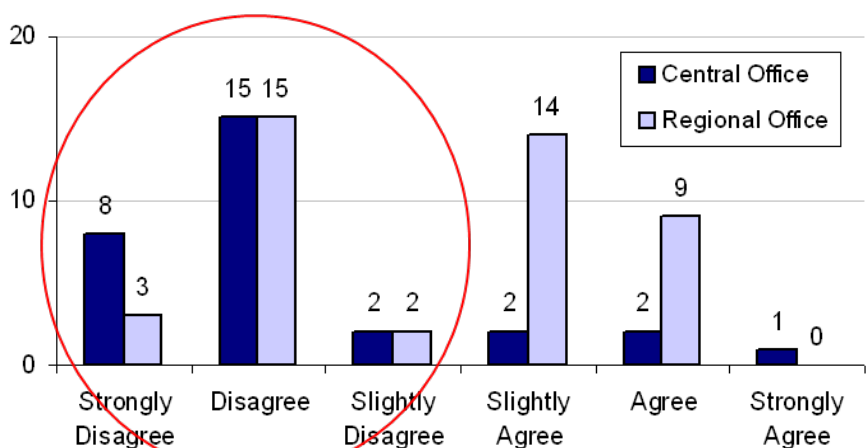
Breakdown of Responses by Years with Organization



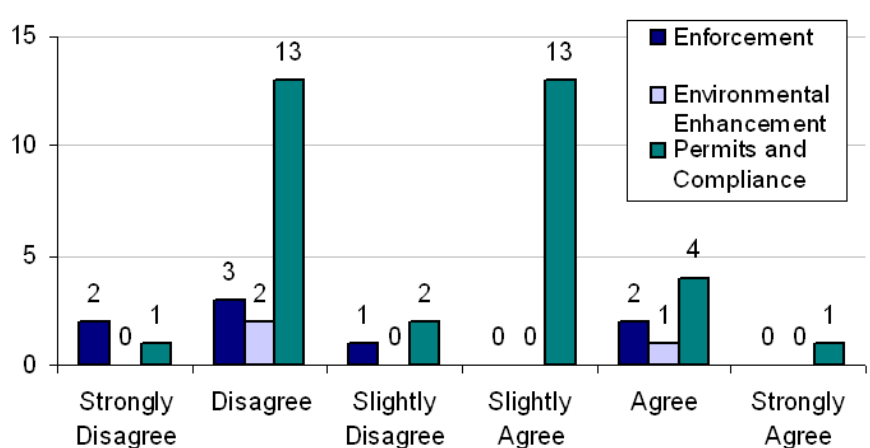
Responses Overall



Breakdown of Responses by Office Location



Breakdown of Responses by Work Area





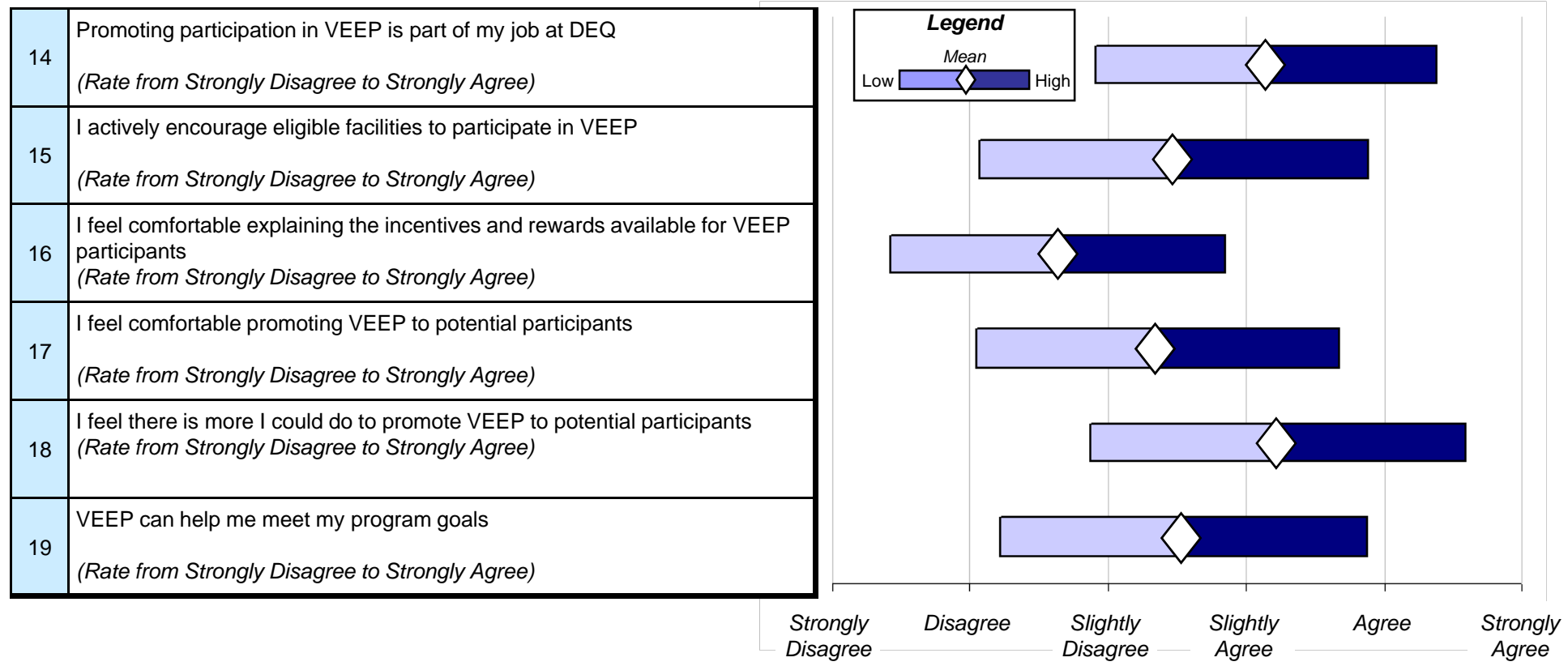
## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis
- ▶ In-depth Survey Analysis
  - Overview
  - Demographics
  - Understanding
  - Support
  - Participation
  - Information Needs
  - Open-ended Questions

# A majority of respondents understand that promoting VEEP is a part of their job yet 73% feel there is more they could do to promote VEEP

## Key Observations

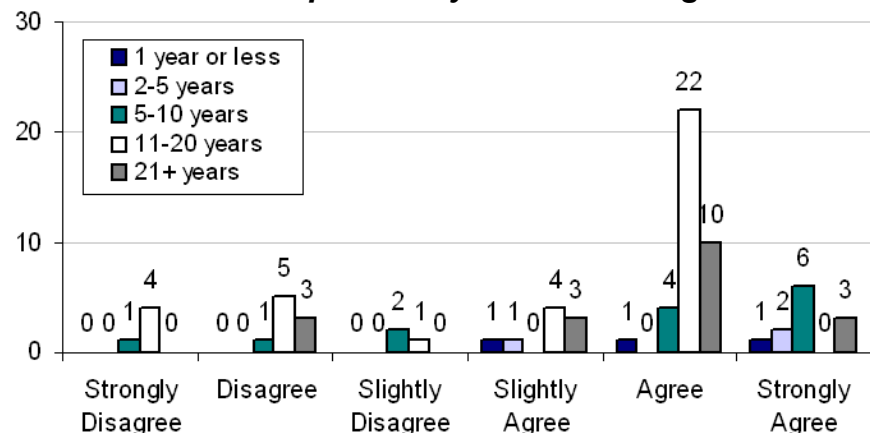
- Managers moderately understand customer rewards and incentives; however ~24% of respondents are not sure how VEEP helps them meet program goals
- 83% of respondents understand that promoting VEEP is a part of their job; however ~40% of respondents indicated that they do not actively promote the program
- A majority (~67%) of respondents are not comfortable speaking about rewards and incentives associated with VEEP



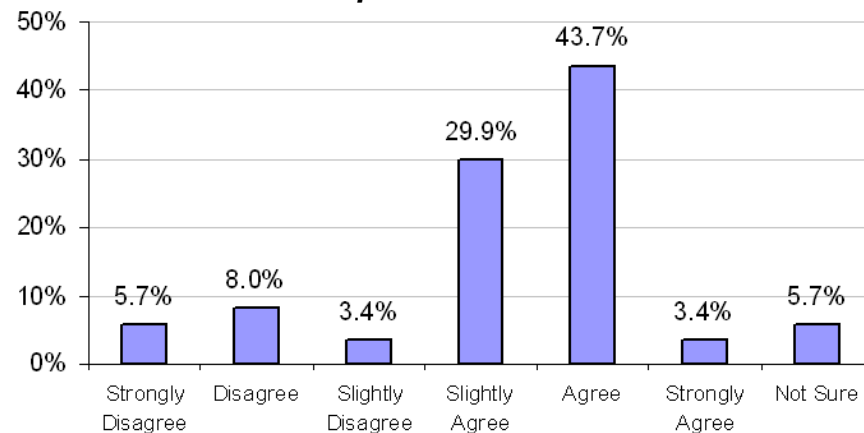
# ~83% of respondents recognize that promoting participation in VEEP is a part of their job at DEQ

## Question 14: Promoting participation in VEEP is part of my job at DEQ

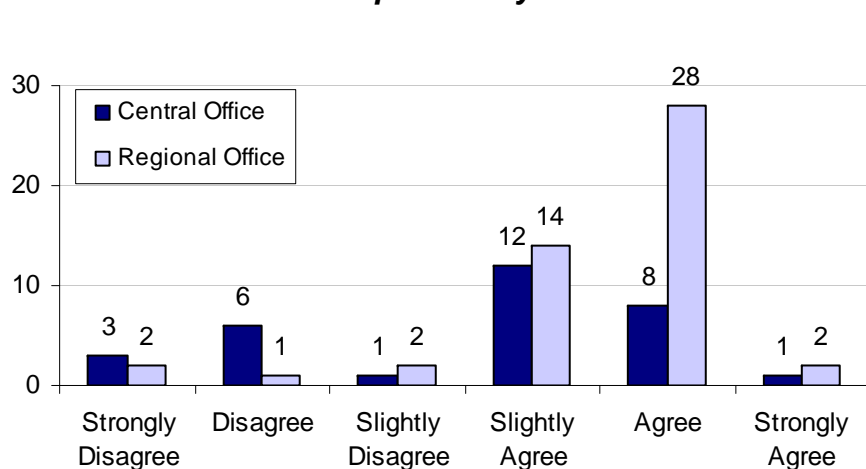
**Breakdown of Responses by Years with Organization**



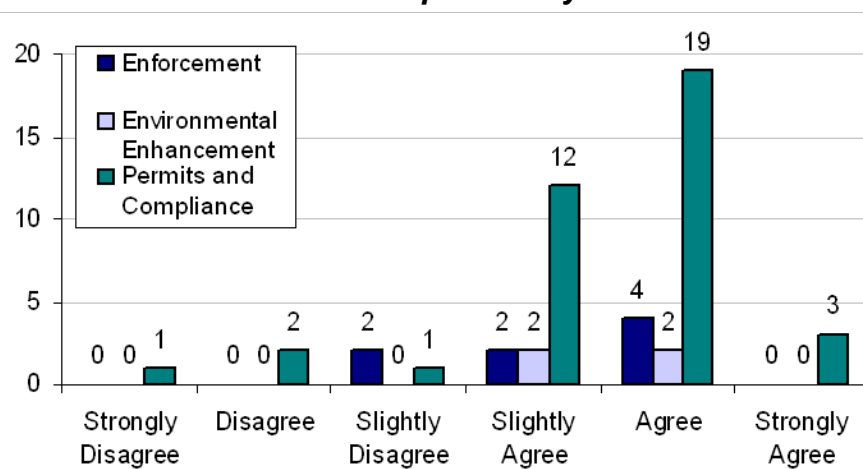
**Responses Overall**



**Breakdown of Responses by Office Location**



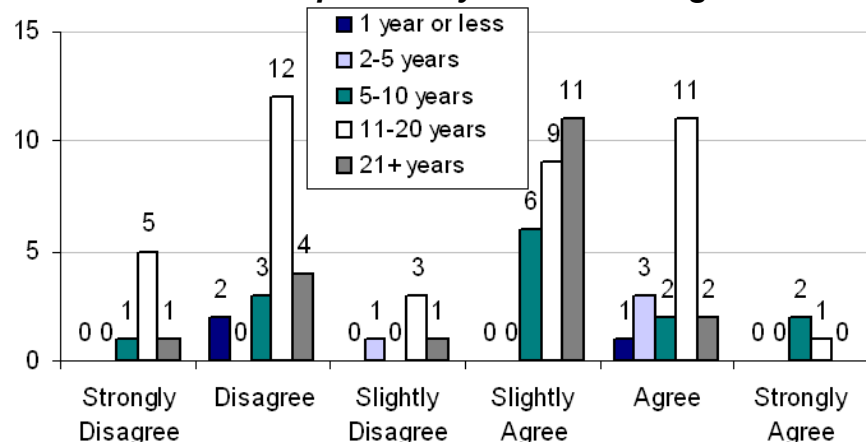
**Breakdown of Responses by Work Area**



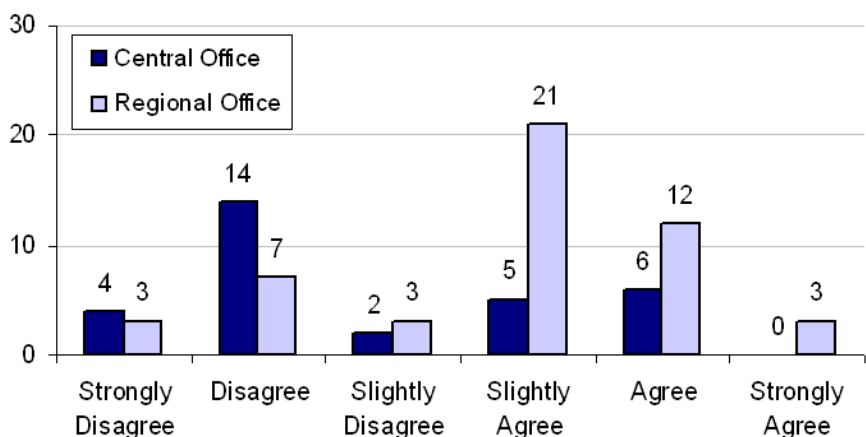
~60% of respondents indicated that they actively encourage facilities to participate in VEEP

Question 15: I actively encourage eligible facilities to participate in VEEP

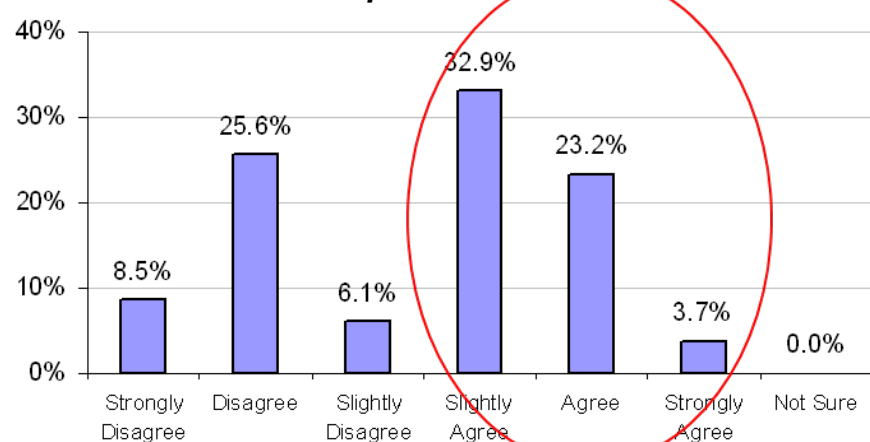
Breakdown of Responses by Years with Organization



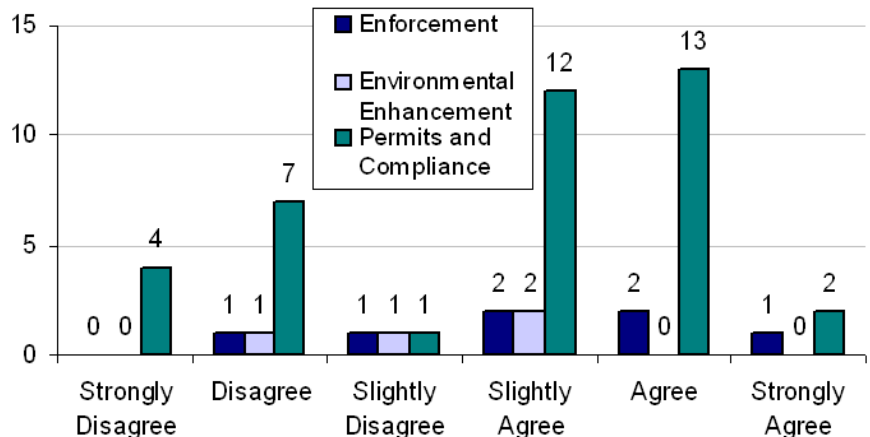
Breakdown of Responses by Office Location



Responses Overall



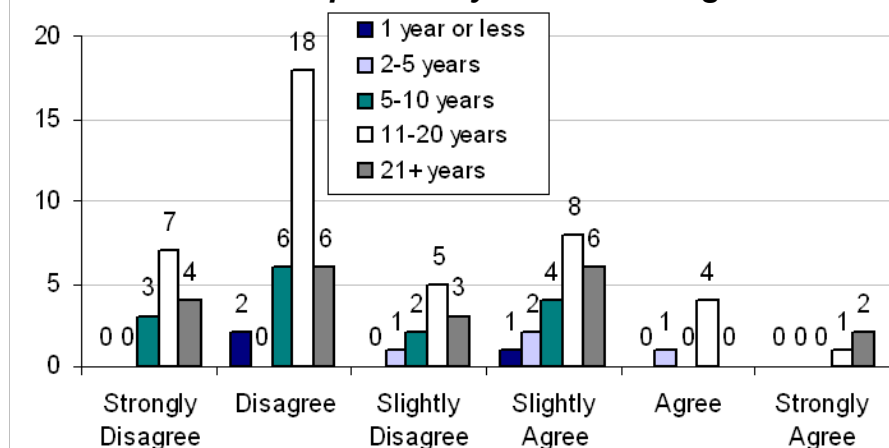
Breakdown of Responses by Work Area



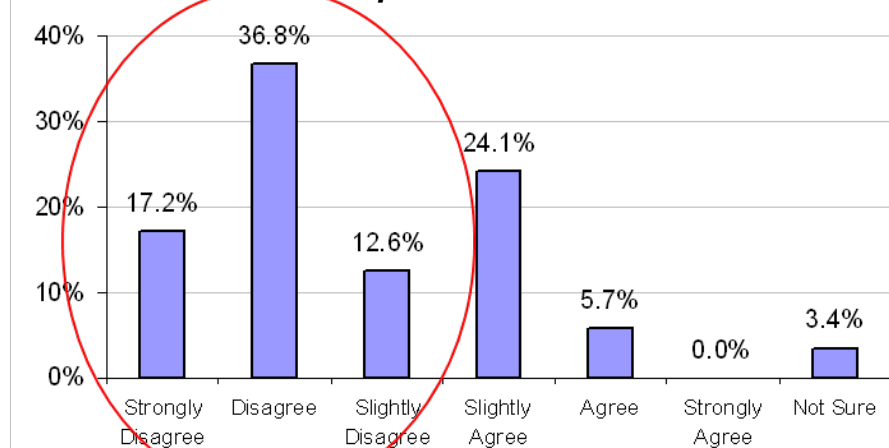
~67% of respondents are not comfortable explaining VEEP rewards and incentives, ~24% feel slightly comfortable

Question 16: I feel comfortable explaining the incentives and rewards available for VEEP participants

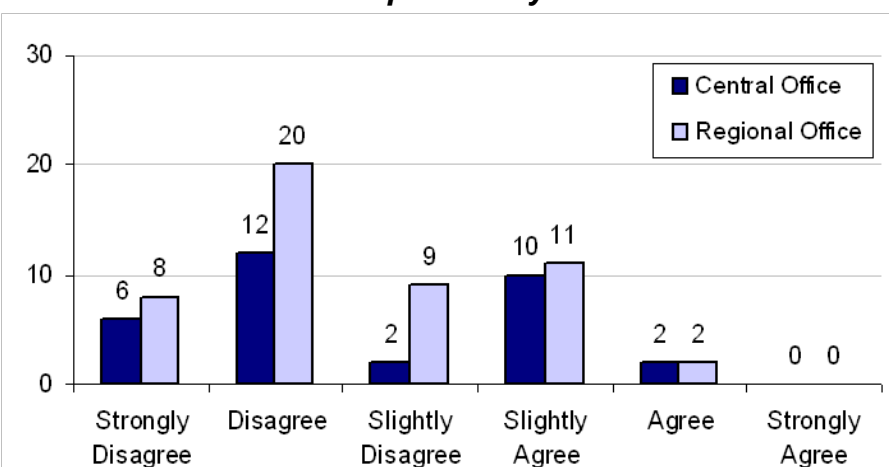
Breakdown of Responses by Years with Organization



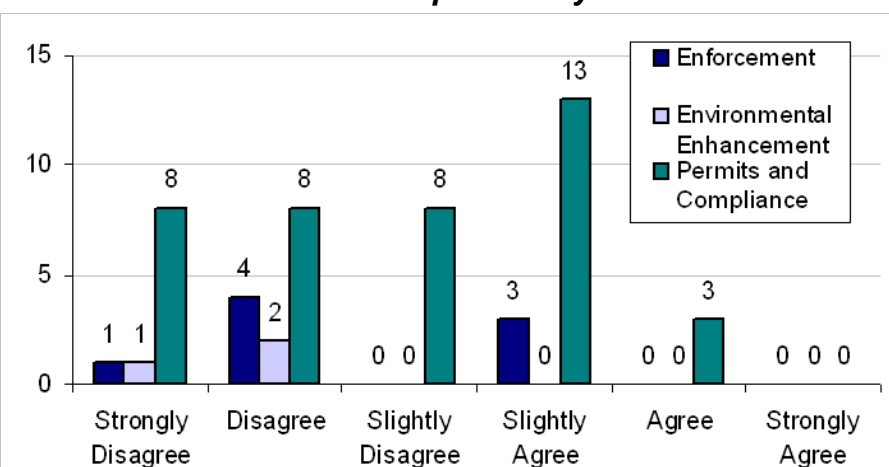
Responses Overall



Breakdown of Responses by Office Location



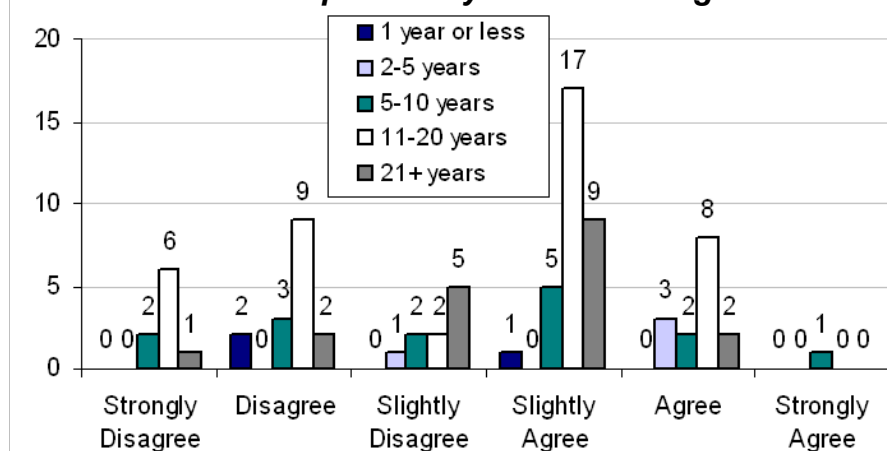
Breakdown of Responses by Work Area



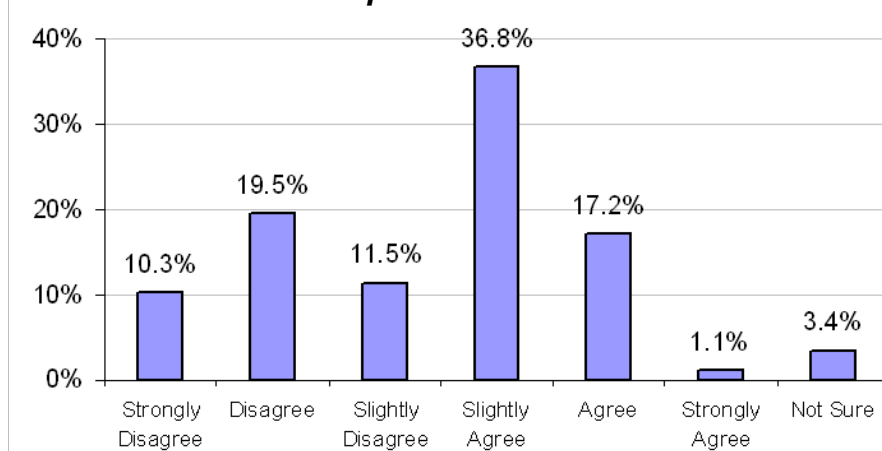
# ~55% of respondents feel comfortable promoting the VEEP program to potential customers

## Question 17: I feel comfortable promoting VEEP to potential participants

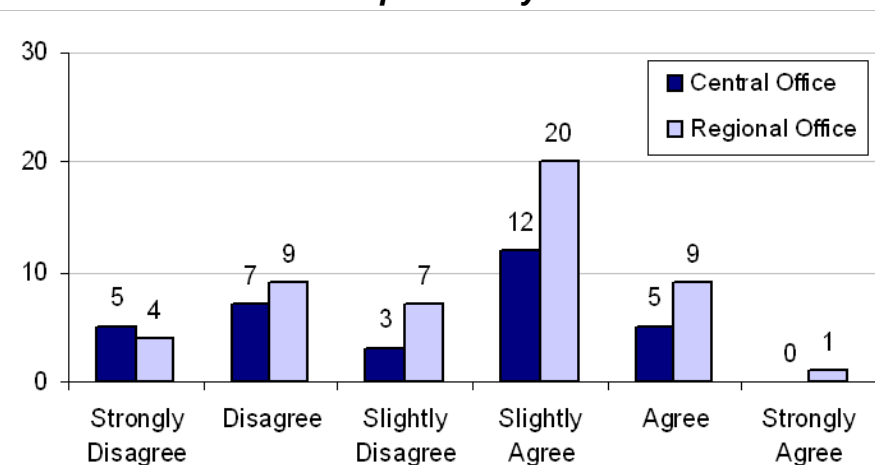
**Breakdown of Responses by Years with Organization**



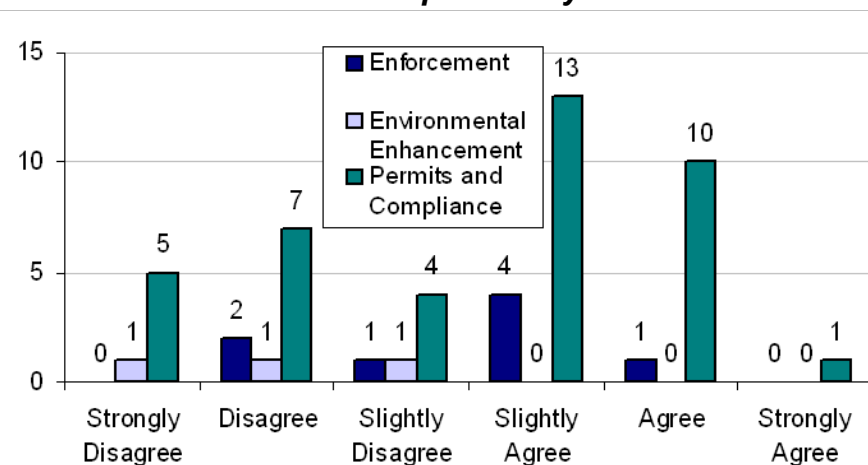
**Responses Overall**



**Breakdown of Responses by Office Location**



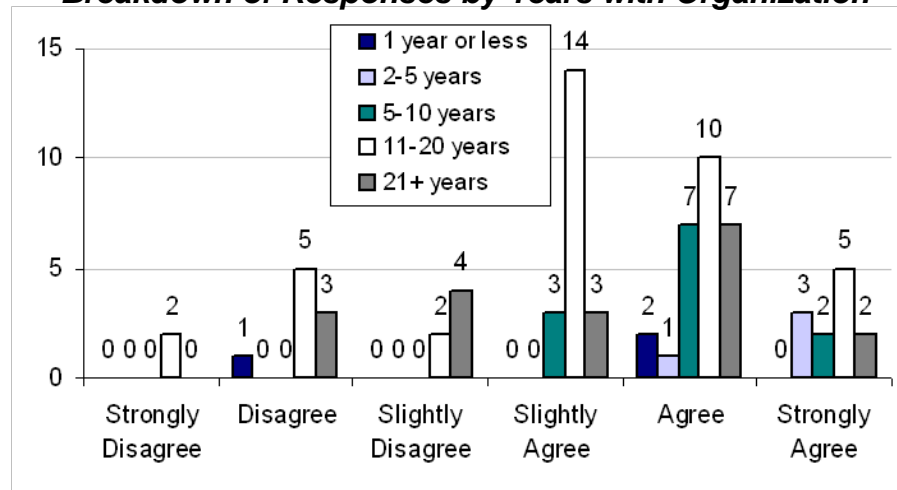
**Breakdown of Responses by Work Area**



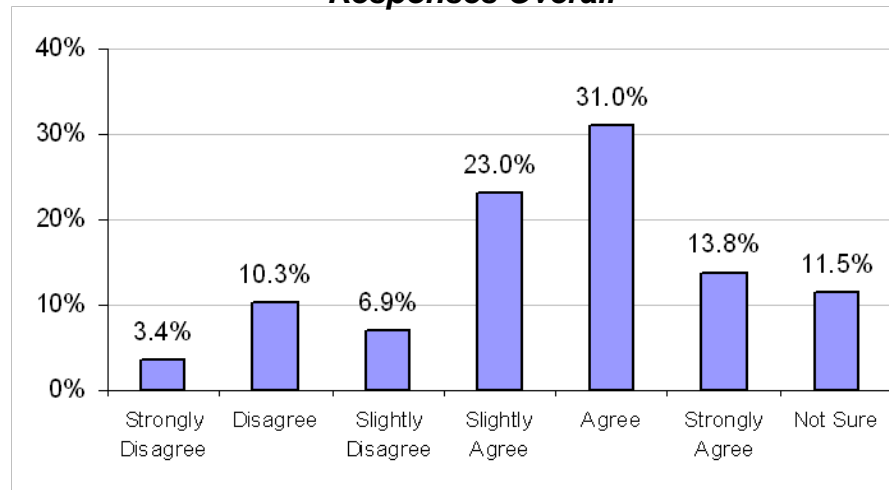
# ~73% of respondents believe they could do more to promote VEEP among potential participants

Question 18: I feel there is more I could do to promote VEEP to potential participants

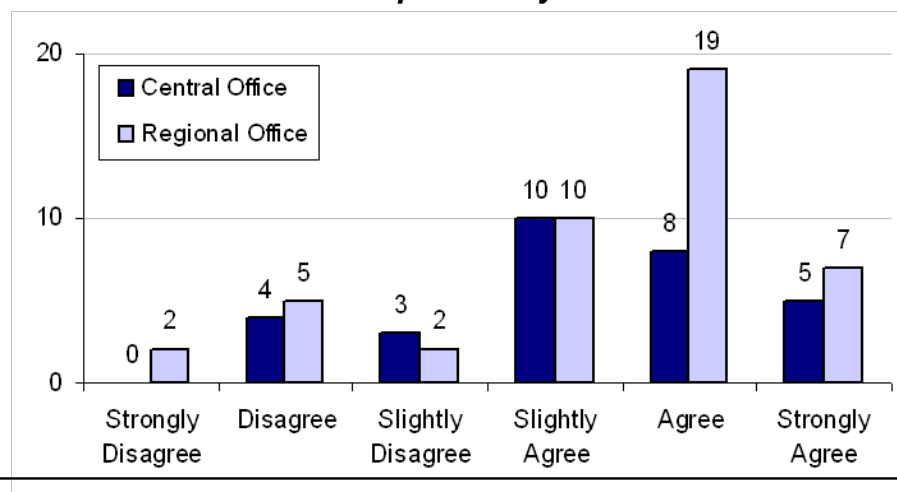
**Breakdown of Responses by Years with Organization**



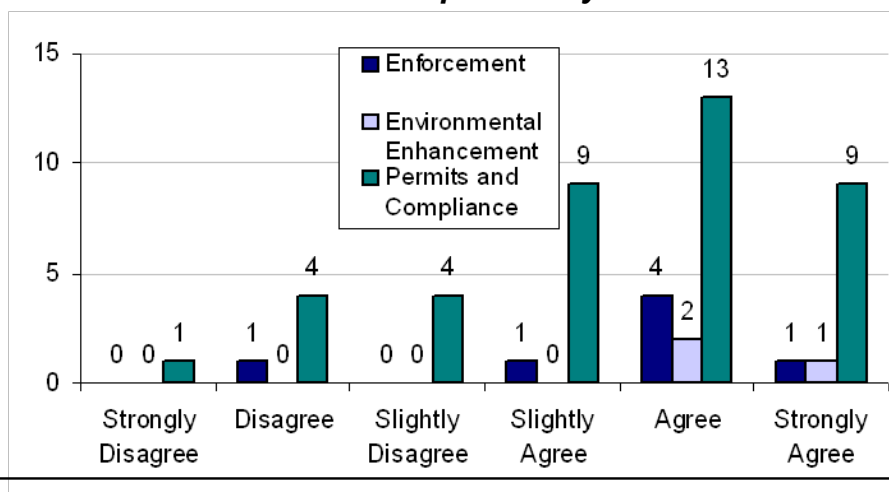
**Responses Overall**



**Breakdown of Responses by Office Location**



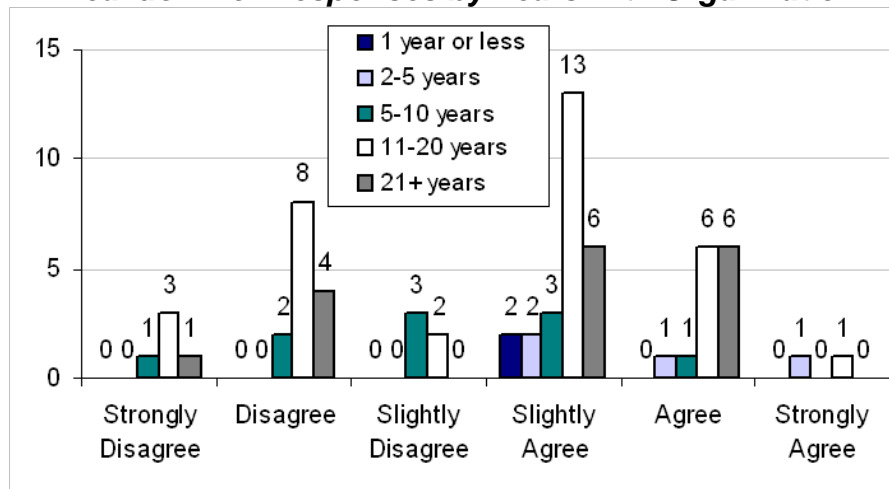
**Breakdown of Responses by Work Area**



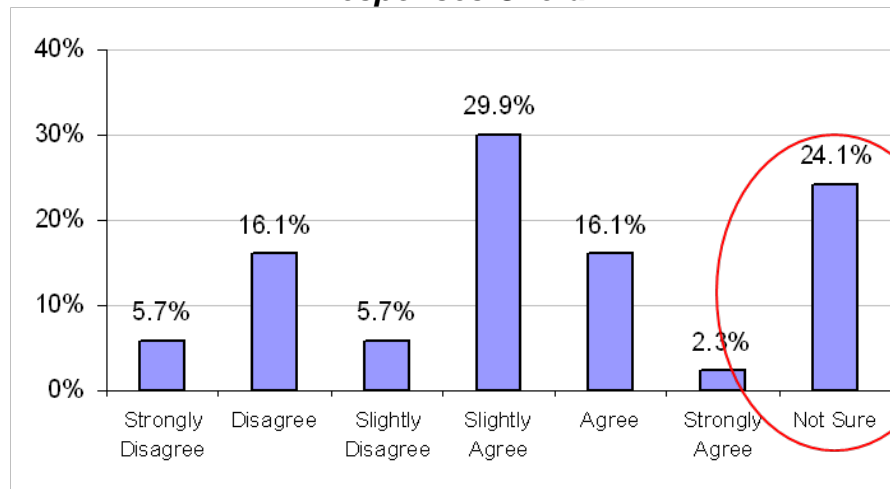
~48% of respondents believe VEEP can help them meet program goals, notably ~24% are not sure

Question 19: VEEP can help me meet my program goals

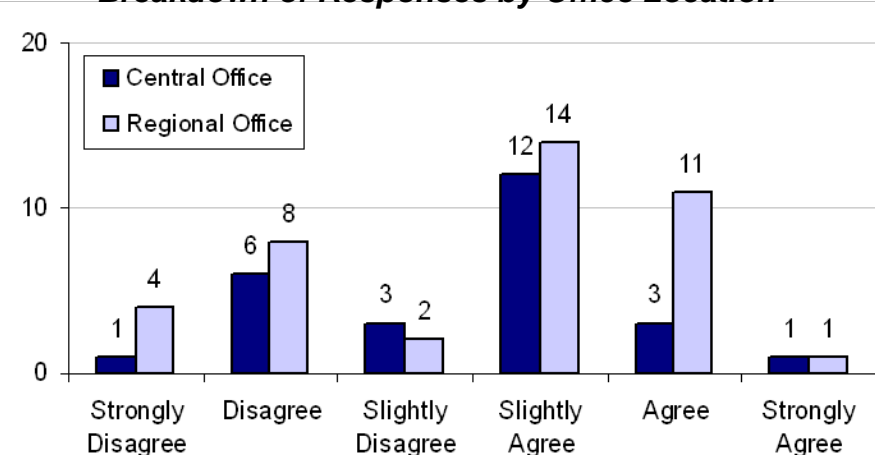
Breakdown of Responses by Years with Organization



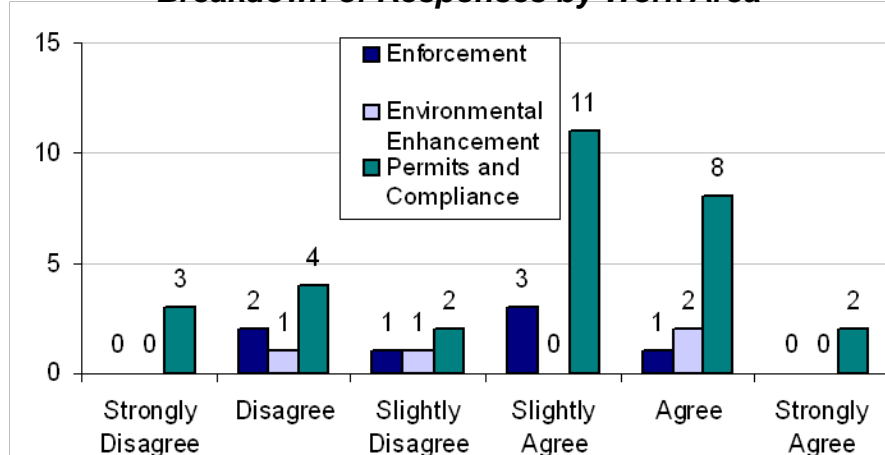
Responses Overall



Breakdown of Responses by Office Location



Breakdown of Responses by Work Area

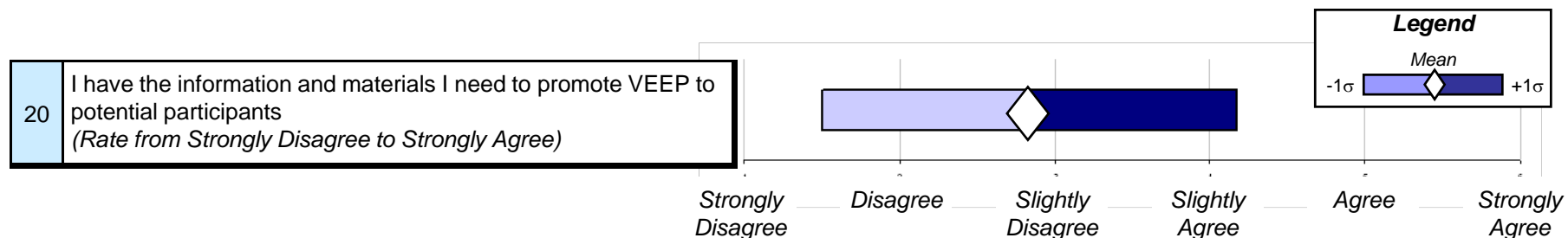




## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis
- ▶ In-depth Survey Analysis
  - Overview
  - Demographics
  - Understanding
  - Support
  - Participation
  - Information Needs
  - Open-ended Questions

## A majority of managers do not believe they have the information and materials needed to support and promote VEEP



21 I would like to receive information about VEEP through the following:  
(Rank top three from the following)

- ▶ External Website
- ▶ DEQ Intranet
- ▶ CEDS
- ▶ A Point of Contact within DEQ
- ▶ Training
- ▶ Paper/Poster Brochure

Channel	Times 1st	Times 2nd	Times 3rd	Times 4+
External Website	15	17	16	39
DEQ Intranet	35	19	13	20
CEDS	2	3	6	76
A Point of Contact within DEQ	11	22	16	38
Training	28	19	14	26
Paper/Poster/Brochure	12	5	18	52

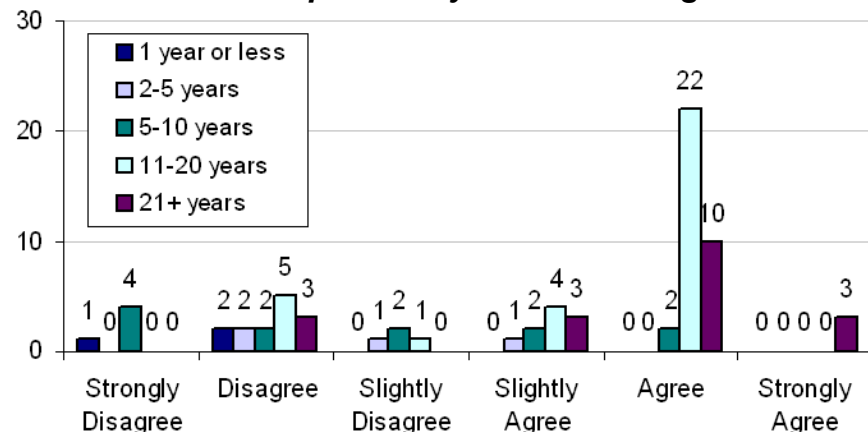
### Key Observations

- A majority of respondents (~61%) stated that they do not have the information or materials necessary in order to support and promote VEEP
- Favored communications channels include the DEQ intranet, training sessions and points of contact/subject matter experts within DEQ

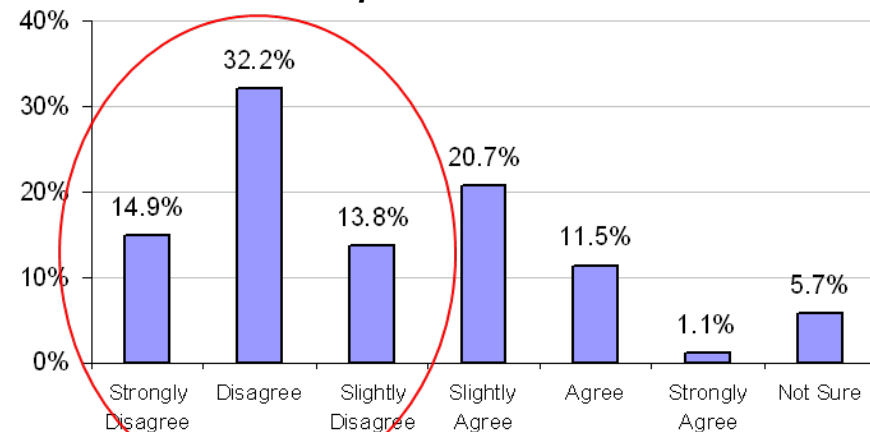
~61% of respondents indicated that they do not have the information and materials necessary to promote VEEP among potential participants

Question 20: I have the information and materials I need to promote VEEP to potential participants

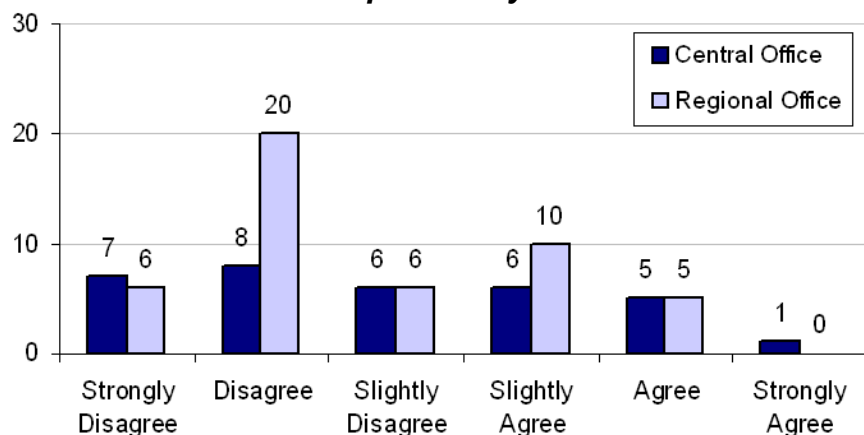
**Breakdown of Responses by Years with Organization**



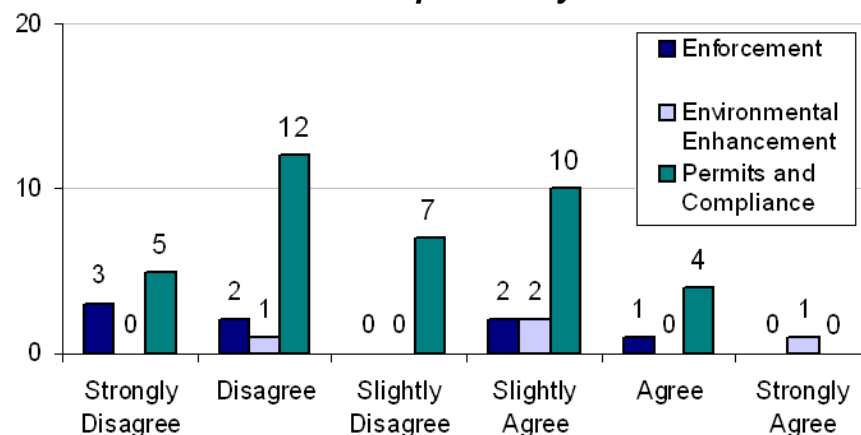
**Responses Overall**



**Breakdown of Responses by Office Location**



**Breakdown of Responses by Work Area**



## Table of Contents

- ▶ Executive Summary
- ▶ Methodology
- ▶ DEQ Manager Survey Analysis
- ▶ In-depth Survey Analysis
  - Overview
  - Demographics
  - Understanding
  - Support
  - Participation
  - Information Needs
  - Open-ended Questions

# Open-ended comments reinforce a need for additional training, promotion and information in order to improve support and participation in VEEP

## **Q22: What training or information could you or your staff use to help better promote the VEEP?**

- ▶ Information – at many levels, including basic, detailed, and more targeted to apply to specific customers/situations
- ▶ Training
- ▶ Printed materials to promote VEEP
- ▶ Regular communication/updates on VEEP
- ▶ Case Studies
- ▶ Technology

### **Sample Comments**

- “Updated information on the effectiveness of the program would be helpful”
- “Real examples of VEEP benefits”
- “What it is, who it applies to, how it works, and benefits for the regulated community and environment”
- “Brochures we can send out on request”
- “Program overview with emphasis on the media that individuals are associated with”
- “Brown bag lunches on this and other programs, e.g. “Program of the Quarter”
- “Searchable database with existing site information including addresses”

## **Q23: What reasons do you think businesses have for not participating in VEEP?**

- ▶ Resources/Cost too high
- ▶ Lack of awareness
- ▶ Unclear benefits
- ▶ Fear of increasing DEQ scrutiny/attention
- ▶ Non compliance issues

### **Sample Comments**

- “Perceived cost v. benefit”
- “Fear of additional paperwork/work in general”
- “Too much work for too few incentives”
- “Unclear what is in it for them”
- “Reduced reporting requirements and limited liability may not be strong enough incentives”
- “Afraid it is another way for regulators to know more about their business”
- “It puts them on our radar screen”

## **Q24: How would you improve the VEEP (include any specific ideas)?**

- ▶ Provide better/clearer incentives
- ▶ Increase marketing/promotion of VEEP
- ▶ Provide more staff support and training
- ▶ Produce printed materials
- ▶ Better customer support and training
- ▶ Improve program requirements
- ▶ Support with technology

### **Sample Comments**

- “Staff and business community training”
- “Easy to read and understand literature for internal and external use”
- “Come up with tangible incentives for companies to participate”
- “Make it more meaningful with bigger fanfare”
- “Promote incentives”
- “Target materials by sector or program to help explain and sell the program better”
- “There is the impression that facilities who are not good to the environment get into VEEP regularly”
- “Provide web-based permitting”

## Question 22: Managers requested training, case studies, technology and printed materials to better understand and promote VEEP

### Question 22: What training or information could you or your staff use to help better promote the VEEP?

#### **Printed Materials**

- ▶ Brochure
- ▶ refresher on the various categories of VEEP participants, how to participate, where companies or DEQ employees can go for more info
- ▶ all program elements mentioned in the survey; where to get additional info to pass on
- ▶ Package of information.
- ▶ Although it pleases me when I see an announcement about a company receiving recognition for their efforts along these lines, I don't know who they became involved or what hoops they had to go through to achieve the recognition. A flyer or e-summary e-mail about the program would be helpful. If a DEQ "Get the fact" sheet exists - or something in that type of format - would be helpful to staff like me or to the public.
- ▶ Goals of the program, criteria for participation, incentives
- ▶ Periodic Update on the program with changes noted and an updated list of participating facilities.
- ▶ process information. How the VEEP application is processes and the incentives for entering VEEP.
- ▶ I think general knowledge of the program among my staff needs to increase.
- ▶ Benefits of VEEP as it relates to reduced compliance options that are approvable by EPA as well as DEQ.

#### **Segmented/Targeted Materials**

- ▶ Identification of specific, uniform application processing and permitting incentives that are both authorized by regulation and acceptable to EPA Region III.
- ▶ Criteria for application to the VEEP. Specific rewards for participating in VEEP by media and VEEP level.
- ▶ How it would apply to Land developers and builders.
- ▶ Impact of the program on my media and program area.
- ▶ Sector/program specific information for distribution

#### **Technology**

- ▶ Searchable database with existing site information including addresses

#### **Case Studies**

- ▶ Case studies with results from participants, from the perspective of the regulated community.
- ▶ Examples of good and bad applications

#### **Regular Updates/Communication**

- ▶ Periodic, brief update on the requirements and benefits.
- ▶ Program updates and periodic training to address staff turnover. Handout/electronic distribution materials.
- ▶ Better communication from CO VEEP. Proactive approach not just a once a year request to fill out a survey.
- ▶ Updated information on the effectiveness of the program
- ▶ More information and real examples of good VEEP benefits
- ▶ What it is, who it is applicable to, how it works, what benefits for the regulated community and the environment.
- ▶ Brochures we could send out upon request.
- ▶ A program over view with an emphasis on the media that the individuals are associated with.
- ▶ /brochure and overview of training. When I was over inspections it was easier to promote in letters, visits, etc. That could be done with the Prep program during incident response. I also wonder if it could not be encouraged regionally or at least local through pertinent groups.

#### **Basic Information**

- ▶ Better understanding of VEEP roles and responsibilities.
- ▶ Updates on program requirements, policy changes
- ▶ agency guidance for including information in correspondence with permittees / citizens.
- ▶ A P2 staff person could attend a program staff meeting
- ▶ Eligibility, incentives, approval process
- ▶ Better understand what promises are made to facilities we are inspecting.
- ▶ Basic info to specific info, some would be a repeat but a refresher never hurts. Acceptance criteria for all levels, performance incentives....
- ▶ Application requirements, benefits to participation.
- ▶ Basics. What it is & what I can do.

#### **Training**

- ▶ Regular training and updates to make sure all staff have received it. Have a can training available to refer to
- ▶ 8-hour VEEP training session to become an expert in the criteria and importance of the program to DEQ.
- ▶ More routine training - perhaps hearing similar information in different formats/sessions will help staff keep VEEP in the forefront of their minds.
- ▶ How to 'market' VEEP; DEQ VEEP policy information; VEEP applicant / participant compliance expectations and program participation incentives.
- ▶ VEEP training on the different levels
- ▶ Short online course or Power Point presentation.
- ▶ Classroom, On-line, Video conference, and brochures
- ▶ Need information on compliance alternatives, specifically how affect regulatory obligations
- ▶ Training class offered through LMS would be beneficial
- ▶ Need training on what it is, how functions and benefits
- ▶ Training that explains advantages of program to agency as well as regulated community. Inspectors, direct contacts with the source, know very little about VEEP.
- ▶ Acknowledge staff have normal duties
- ▶ Require staff to attend training sessions to introduce other DEQ programs; the sessions should treat staff more as concerned citizens than staff. Why? Because are likely to be more receptive to what they hear and see if they know how it affects them as people.
- ▶ half-day training, info summaries
- ▶ Brown bag lunches to to hear about this and other programs, e.g. "Program of the Quarter" or "month"
- ▶ Some substantive training on who is eligible, what they need to do, how to write a EMS plan, how to promote the program and what the program can actually do to help us with the already heavy workload we have in our jobs.

#### **Negative Feedback**

- ▶ None, leave us alone and let us do our jobs. How does participating in VEEP help us be more productive? All it does is give us more things to negotiate with businesses which makes our work more complicated and less productive.

# Questions 23: Managers requested well defined incentives, improved staff/customer support, increased promotion and integrity of the program

## Question 23: How would you improve the VEEP (include any specific ideas)?

### **Better/Clearer Incentives**

- ▶ increase the incentives to the greatest extent possible in ways that a company can measure
- ▶ We need to come up with tangible incentives for companies to participate
- ▶ Make it more meaningful with bigger fanfare.
- ▶ Promote incentives.
- ▶ The incentives available now that I know of seem to be sufficient, although I don't think the regulated community sees them as "high value".
- ▶ I work in tanks and on spills. I know this is not the arena that VEEP was designed for but I think we should explore ways to mold VEEP into these programs. The operators are typically small business and so they are not likely to care about VEEP. We need a program that speaks to them because they are by far spilling more oil than industry is as a group. Take a look at all the programs on the basis of the type of source. Set up different VEEP programs that can appeal to small businesses. They probably want incentives like not having to be inspected as frequently, but are not going to see the EMS as something they want to take the time to create. Thanks for the opportunity to comment. D. Meanwhile
- ▶ More incentives to join
- ▶ I believe the hardest part is the incentives...I understand the difficulties but it would be helpful
- ▶ More advertisement to raise the awareness of the regulated community, more incentives for the regulated community to participate.
- ▶ Greater incentives to reduce some of the inspections required
- ▶ Clarify incentives and benefits for participants.
- ▶ Better quantification of benefits

### **Technology**

- ▶ Provide web based permitting

### **More Promotion/Marketing**

- ▶ More outreach with regulated community.
- ▶ Target outreach to industry leaders/management.
- ▶ Outreach, especially in enforcement.
- ▶ Make recommendations to applicants as appropriate
- ▶ A professionally prepared brochure to hand out to prospective facility staff would be helpful.
- ▶ Land development is having a large impact on the environment in the state and VEEP does not seem to be involved in promoting Low Impact Development.
- ▶ Get rid of the incentives and increase the good press (most of the good actors don't want the regulatory reductions, but poor performers always do).

### **Staff Support/Training/Materials**

- ▶ Internal and external training. Easy to read and understand literature for internal and external use.
- ▶ Need more knowledge.
- ▶ Tailor sector/program initiatives for technical staff to distribute (i.e., what does a VEEP look like for a dry cleaner, a gas station,...)
- ▶ us tangible reasons to believe and tell companies about it.
- ▶ We need an agency VEEP champion who pushed the program on a weekly basis.
- ▶ For VEEP staff to work more closely for regions in defining who is a candidate, what a facility needs to do, and what benefits they can be afforded them.
- ▶ The inspection programs are the most likely to interact with the VEEP program. Might be a good idea to improve interaction with the inspection programs, provide a checklist for their consumption (not required) and attend a few inspections with them if VEEP facilities.
- ▶ Get more buy-in from EPA R-III not just EPA Headquarters because there opinions differ.
- ▶ More CO involvement. They need to spearhead the program.
- ▶ Work through local programs (county and city level) to promote VEEP and also share information on good or bad facilities
- ▶ More staff

### **Better Customer Support/Training**

- ▶ Have DEQ staff visit one or more participating facilities to see 1st hand what has been done to get them into VEEP.
- ▶ Clarify resource and logistical issues if a VEEP facility were to request specific staff prepare permits for facilities outside of a given Regional jurisdiction. See also 22, above.
- ▶ I think we need to have further training on the benefits to the environment and to an individual company (examples we can use as role models)
- ▶ Staff and business community training

### **Tougher Requirements/Program Integrity**

- ▶ Make it legitimately tougher to get in. There is the impression that facilities who are not good to the environment get into VEEP regularly. It seems a program of environmental excellence in name only.
- ▶ Don't allow facilities with current and regular compliance deficiencies into the program.
- ▶ Need to look at the EPA IG's audit of its own VEEP program so see what they found.
- ▶ centralize/objectify evaluation of VEEP participants compliance with program requirements, publish results to all regional/central office divisions with facility oversight functions
- ▶ by following agency guidance for including information in correspondence with permittees / citizens.

### **Negative Comments**

- ▶ Have VEEP personnel stop treating regional personal as inferiors to used in meeting their goals (the whole program is a one-way pyramid scheme where everyone works toward the glorification of a few senior Central office staff & their managers).
- ▶ Stop making it mandatory that all staff support and participate in it. Stop giving it more importance than other aspects of our jobs
- ▶ Don't shove it down our throats or provide vague details and happy talk.



# Questions 24: Managers speculate that customers shy away from VEEP due to cost, limited awareness, unclear benefits, and a fear of increased attention/scrutiny

## Question 24: What reasons do you think businesses have for not participating in VEEP?

### Awareness

- ▶ Not aware of program.
- ▶ Most likely because they don't know about it or don't know enough about it.
- ▶ don't know, don't understand
- ▶ We have not done our job selling it to them.
- ▶ perhaps do not know about the program at all or sufficiently to understand the benefits
- ▶ Lack of exposure/knowledge
- ▶ Lack of understanding; No incentives recognized.
- ▶ Do not know about it
- ▶ lack of knowledge and training about the program
- ▶ Unaware of existence of program and benefits.
- ▶ Since I work at DEQ and don't know that much about it, maybe they don't know about it either.
- ▶ They don't know (enough) about the program
- ▶ unfamiliar/unsure of Program,
- ▶ Unsure of how to participate. Unsure what it is
- ▶ Lack of knowledge of the program.
- ▶ Not aware of the program.

### Increased DEQ Scrutiny

- ▶ It puts them on our radar screen. In a universe where there are 9000 HW notifies stepping up and telling the department that you are doing things right gets you noticed
- ▶ Fear of the unknown
- ▶ Do not want the government in their business. Scrutiny, exposure.
- ▶ afraid its another way for regulators to know more about their business, unwilling/unable to dedicate staff to work on Program, takes away from bottom line - profits.
- ▶ Ability to modify permits and regulatory requirements is not as great as perceived.
- ▶ fear of increased regulatory intrusion into company operations, paperwork

### Cost/Resources

- ▶ There may be financial disadvantages that are not counteracted by decreasing regulatory compliance costs
- ▶ Probably no real benefits
- ▶ Probably perceived cost vs. Benefit
- ▶ initial costs. Distrust.
- ▶ IS14001 is a lot of work and VA DEQ's program comes off as too much paper work without benefit; .
- ▶ More time and energy. If they are not required and we cant show a large gain for them there is no reason to participate.
- ▶ Expense.
- ▶ Not cost efficient to them
- ▶ cost
- ▶ Money - cost of participation based on reward. For smaller businesses, the cost to develop the EMS can be prohibitive.
- ▶ Insufficient rewards.
- ▶ Not sure it is worth effort and cost for them to participate.
- ▶ expense,
- ▶ Initial effort and outlay required
- ▶ The value of the incentives do not justify the corporate expense and
- ▶ Too much work for too few incentives.
- ▶ Cost to benefit
- ▶ More complexity in operations and more paperwork.
- ▶ Extra work, extra cost, limited benefits.
- ▶ Do not want more paperwork, etc., whether perceived or actual.
- ▶ I speculate that either a lack of commitment or expertise, and costs to get outside help
- ▶ Lack of time and staff, emphasis on product output
- ▶ Increased work, Lack of time due to other business priorities,
- ▶ People are busy Difficult to justify the time spent to determine if it is applicable and advantageous to them to participate. Business as usual generally prevails.

### Non-Compliance

- ▶ Non-compliance -- they may have an ongoing compliance issue they do not want brought out into the light of day.
- ▶ business may fear that they will not be able to show continued improvement because they are already doing everything possible to minimize waste generation, recycle, etc

### Unclear Benefits

- ▶ Unclear what is in it for them.
- ▶ Benefits are not clear enough and may feel like DEQ will inspect facility
- ▶ Unclear incentives.
- ▶ and lack of incentives.
- ▶ some do not think there is any real benefit
- ▶ Do not know contacts and dealing with Central Office staff is a pain, too much enviro-speak mumbo-jumbo, complex EMS requirements and agency expectation, little benefit in many environmental programs where USEPA mandate minimum requirement and frequencies, and most know that the public does not care and it will not improve the bottom line.
- ▶ It's being used primarily for marketing rather than environmental purposes. Incentives that are both measurable and of clear benefit remain murky. Being able to request permits be processed as a priority is NOT an incentive, because most new permits are more, not less, restrictive than the previous versions due to regulatory changes. It may be more pragmatic for VEEP facilities to request their permits be delayed and processed LAST, rather than first.
- ▶ There is no real benefit to the businesses, more paperwork, gives them false hope that we will give them special treatment when in reality we have no authority to give them special treatment.
- ▶ Reduced reporting requirements and limited liability may not be strong enough incentives, but
- ▶ They have heard from other E2 and E3 facilities that there are false incentives which DEQ offers.

### Positives

- ▶ Name recognition, incentives the program offers. They have to take advantage of the incentives however.
- ▶ IMAGE
- ▶ Recognition/care for environment.