Agency Response to Draft Report and OIG Analysis

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

Office of Public Engagement and
Environmental Education

March 3, 2016

<u>**MEMORANDUM**</u>

SUBJECT: Agency Response to Draft Report: *EPA Cannot Assess Results and Benefits of Its Environmental Education Program* (Project No. OPE-FY15-0001)

FROM: Micah Ragland, Associate Administrator /s/
Office of Public Engagement and Environmental Education

TO: Carolyn Copper, Assistant Inspector General for Program Evaluation
Office of the Inspector General

1. INTRODUCTION

EPA appreciates the opportunity to review the Office of the Inspector General (OIG) report entitled *EPA Cannot Assess Results and Benefits of its Environmental Education Program* (Project No. OPE-FY-0001) dated January 15, 2016. This document details EPA's response to each of the major findings, recommendations, and conclusions stated in the document.

EPA believes that the draft report as a whole does not provide evidence to support many of the findings and conclusions. The draft report indicates a fundamental lack of understanding on the part of OIG about OEE's mission and mandate, how performance is measured, the purpose, function and authority of the National Environmental Education Advisory Council (NEEAC), and environmental education in general.

Although we agree there are some areas for improvement, as discussed in this memo, EPA strongly disagrees with OIG's assertion that "OEE is significantly impaired in its ability to provide evidence of program results and benefits; manage the program to achieve results and benefits; or spot fraud, waste and abuse." Throughout the OIG investigation and summarized within this response, we have provided sufficient information to refute this finding and other findings and conclusions. The over-the-top rhetoric in the title and At-a-Glance section goes well beyond what is substantiated in the report and warrant redress by the OIG. EPA respectfully requests that OIG retitle the document and remove or revise these unsupported statements in the At-a-Glance section and where they appear elsewhere in the document.

The report also indicates a disregard for and/or lack of understanding about many of the justifications and data (both quantitative and qualitative) OEE has provided to OIG since November 2014 (particularly related to program performance and internal controls). There are also significant inaccuracies and mischaracterizations about the program and its results that require detailed clarification (provided herein and in previous submissions to and/or discussions with OIG).

Despite many noted factual errors, mischaracterizations, and faulty assumptions in OIG's findings and conclusions, EPA concurs (with explanation) with the majority of OIG's recommendations.

EPA believes that the environmental education program provides vital support for the mission of the Agency to protect human health and the environment in 3 ways:

1. Helping the public understand the purpose and need for rules and regulations and better understand the regulations themselves so that they can become active participants in EPA's regulatory development process;
2. Providing the public with the education and information they need to become stewards of our environment and providing an effective avenue for public engagement on the Agency's mission; and
3. Supporting EPA's 5 Strategic Goals with local community to national-level programming.

OEE implements impactful programs in accordance with the requirements of the National Environmental Education Act (the Act). These programs provide funding, direction, and leadership to the EE field supporting communities, educators, and students nationwide. EPA is confident that the continued positive performance of EE program components is indicative of OEE's overall success in advancing environmental literacy and stewardship.

Overview of EPA positions:

1. The significant errors of fact and faulty assumptions on the part of OIG regarding the role and authority of the NEEAC and the impact of/Agency response to its report(s) render the associated findings unsound.
2. The federal and Agency policy standards of practice, performance, and reporting for which OIG is holding the Office of Environmental Education (OEE) accountable differ from those for which the Agency holds the office accountable.
3. Regarding the Environmental Education program's ability to provide evidence of results, the report does not provide evidence that the Agency is not confident in OEE's ability to properly manage the environmental education program, including grant funding. OEE complies with all applicable Agency rules for monitoring of grant funding, performance monitoring, and reporting. By continually assessing the individual components of OEE's programming, such as grants, OEE demonstrates the success of the sum of its individual parts.

4. Environmental Education programmatic work has consistently been structured through strategic frameworks with goals, objectives and performance measures that link directly to the Agency's strategic goals.
5. The report does not provide the basis for asserting that OEE is at high risk for fraud, waste, and abuse of public funds. Sufficient program management and oversight controls needed for program accountability and budget justification are already in place.

Organization of this response:

OIG's report covers a range of overlapping topics and findings. OEE has organized this response by overarching theme. Within discussions of these themes are specific comments on the draft report.

- discussion and findings directly related to the OEE advisory committee;
- discussion and findings related to programmatic performance reporting and assessment, and strategic planning;
- discussion and findings related to research initiatives;
- overall conclusions; and
- specific responses to each OIG recommendation.

2. DISCUSSION AND FINDINGS RELATED TO THE NATIONAL ENVIRONMENTAL EDUCATION ADVISORY COUNCIL

2.1 *Regarding the 2005 Report of the National Environmental Education Advisory Council, OIG asserts that:*

- *OEE developed the framework and tools to measure the environmental education program, but did not execute or update those tools to assess comprehensive program results;*

- *OEE implemented research initiatives to improve environmental literacy and stewardship, but did not assess the effectiveness of these initiatives toward achieving OEE program performance goals; and*

- *OEE funded programs to improve educators' ability to teaching environmental concepts, but did not assess the effectiveness of the program toward achieving OEE performance goals.*

OEE Response Overview:

The NEEAC is a Federal Advisory Committee Act (FACA) committee. According to its charter,[i] the NEEAC is tasked with developing a biennial report to Congress and the EPA Administrator assessing environmental education in the United States and providing advice and recommendations on other environmental education issues, including matters relating to activities, functions, and polices of EPA under the National Environmental Education Act (the

Act).[ii] The purpose of the NEEAC is not to perform program audits of OEE or other EPA offices. The Agency is not obligated to accept, decline or otherwise act on FACA recommendations. The Agency is obligated only to receive and acknowledge the Council's recommendations.

In its 2005 Report, the NEEAC chose to assess the field and provide a series of best practices for EE organizations to consider.[iii] This report did not focus specifically on OEE's programs. Rather, this report provided best practices to be adapted as appropriate to any organization within the field of EE.

The 2005 NEEAC Report and other NEEAC reports do not represent audits of OEE, nor do the recommendations therein establish binding requirements specific to the Agency. Therefore, it is inappropriate to hold the Agency accountable to the report for specific programmatic actions. As a member of the EE field of practice, OEE has consistently looked to these best practices identified by the NEEAC to provide guidance for strategic planning and to achieve OEE's goals. Overall, OEE has demonstrated a strong commitment to implementing the best practices identified in the 2005 NEEAC Report. Equating the recommendations (best practices) in the report to requirements for specific OEE and Agency operations indicates a lack of understanding about the role of the NEEAC and its reports; an assumption of OEE's risk for fraud, waste and abuse based on a comparison of specific Agency operations to these general best practices is therefore also inappropriate.

Following is a discussion of OEE's activities to successfully implement the three best practices specifically questioned by OIG, as well as several related corrections to the report.

2.1.1 *Regarding the assertion that OEE developed the framework and tools to measure the EE program, but did not execute or update those tools to assess comprehensive program results:*

As noted above, the NEEAC recommendations in the 2005 NEEAC Report pertain to the field of EE, not specifically to OEE's programs. OEE's framework and tools for measuring the EE program at EPA are detailed within OEE's strategic plans. This plan was informed by the best practices for the field of EE, as discussed within the 2005 NEEAC Report.

OEE has assessed program results for each OEE program on an ongoing basis and reports these results to the Administrator. A detailed discussion on the evaluation of OEE's programmatic performance and processes for reporting to the Administrator is discussed in Section 3 of this report.

Evaluation of any potential need to update those measures will continue as part of the current OEE strategic planning process. Further details on the strategic planning process for OEE are discussed in detail in Section 3 of this report.

2.1.2 *Regarding the OIG assertion that OEE implemented research initiatives to improve environmental literacy and stewardship, but did not assess the effectiveness of these initiatives toward achieving OEE program performance goals:*

OEE's research initiatives directly support the goals of improving stewardship and student achievement within the 2006-2011 Strategic Plan. Since 2005, OEE's research initiatives have provided support for the establishment of fundamental data to begin broad scale evaluation of environmental literacy rates within the United States and to investigate the connection between environmental education and its impact on environmental quality. Furthermore, the successful completion of this research is indicative of OEE's success in responding to the best practice outlined in the 2005 NEEAC Report towards achieving OEE's goals. The findings of the research, including citations for the published results of the studies (which were provided to and discussed with the OIG) are reiterated in detail in Section 4 of this report.

2.1.3   *Regarding the OIG statement that OEE funded programs to improve educators' ability to teaching environmental concepts, but did not assess the effectiveness of the program toward achieving OEE performance goals*:

OEE's program to improve educators' ability to teach environmental concepts is conducted through cooperative agreement and grant programs. During each competition, the Request for Proposals issued for new projects (in accordance with Office of Grants and Debarment (OGD) requirements and best practices) requires that the objectives, outputs and outcomes of the funded project support the goals of OEE and the Agency.

Successful implementation of OEE's grant programs and performance by grantees (as monitored according to the requirements set forth by OGD) has consistently indicated progress towards achieving OEE's goals of improving environmental literacy and stewardship. OEE abides by OGD requirements for evaluation of performance for grantees, as detailed in Section 3 of this report.

2.1.4   *Clarifications to the report*

> *2.1.4.1 Clarifications to page 9 of the OIG report*

On page 9 of the OIG report, OIG states:

> "In 2005, NEEAC made recommendations for improvement as required by [the Act]. However, it was not until 9 years later (July 2014) that the EP sent a memo to the NEEAC expressing support for the recommendations. Although the Federal Advisory Committee Act does not require council recommendations to be acted upon, U.S. Accountability Office (sic) internal control standards require that the findings of audits and other reviews be promptly resolved."

Regarding OIG's assertion about OEE's lack of a timely response, OEE did not take 9 years after the report was submitted to the EPA Administrator to acknowledge the 2005 NEEAC Report. This is factually inaccurate. EPA acknowledged receipt of the 2005 report shortly after it was submitted and sent follow-up correspondence in 2006. This information was provided to and discussed with the OIG.[iv] What OEE did provide in 2014, at the request of the current NEEAC, was an account of the OEE activities and initiatives that support the 2005 recommendations. That documentation was also previously provided to and discussed with the OIG. OEE also notes

that the NEEAC recently completed its 2015 Report to Congress.[v] A copy of the letter sent by the Administrator to the NEEAC chair acknowledging receipt of the 2015 Report was provided to OIG.

As discussed previously in this response, the NEEAC is not an auditing body and the intent of the 2005 NEEAC Report was to assess the field of EE and to provide best practices for the professional field of environmental education, not to perform an audit, a compliance assurance or similar review of OEE operations.

Specifically, the 2005 NEEAC report states that "*the eight recommendations [are] made to enable the profession to set the standard for excellence, measure results, and celebrate successes"*…. The Council developed these recommendations *"to chart a course for the years ahead. Implementing [the] recommendations will position **the profession** to set standards of excellence, measure results and celebrate success."* In its report, OIG summarizes the intent of the report to review "*the extent and quality of environmental education."* The focus of the report is on improving EE field, not on auditing OEE operations. Therefore, the application of the U.S. Accountability Office (sic) internal control standards in this manner to this report is inappropriate.

OIG mischaracterizes the nature and stated purpose of the NEEAC report and of OEE's response. EPA respectfully requests that OIG remove or correct this discussion and associated findings, conclusions, and recommendations.

Notwithstanding, as reviewed earlier in this response, OEE believes that the best practices recommended by the NEEAC in the 2005 NEEAC Report are valuable to the EE field. Although OEE is not required to do so, we have taken many steps to support those recommendations through its strategic planning and programming.

> *2.1.4.2 Clarifications to page 2 of the OIG report*

On page 2 of the OIG report, OIG states:

> "The National Environmental Education Act of 1990 established the NEEAC, whose 11 members are appointed for 3-year terms and receive compensation when engaged . . ."

This statement is incorrect. NEEAC members are appointed for 1, 2, or 3 years. Per the FACA Handbook section on membership term limits, "Although FACA does not limit membership terms, EPA's policy is that, unless otherwise prescribed by statute, members should be appointed for no longer than a total of 6 years (typically in 2- or 3-year terms) to provide fresh perspectives on the committee. Reappointment of members is not required or guaranteed."[vi]

2.2 **_OIG also finds that OEE did not always fully empanel the [NEEAC] as the Act requires. OIG asserts that this resulted in a lapse during which the [NEEAC] provided_**

no advice to the Administrator or congressionally required reports on the extent and quality of environmental education in the nation.

OEE Response Overview:

Since 1992, the 2010-2011 timeframe was the only time when the NEEAC was not fully empaneled. As was discussed in writing and with OIG directly, significant budget constraints hampered OEE's ability to support NEEAC operations. Members continued to be appointed to the committee when appropriate candidates were identified and designated slots were available.

2.2.1   Challenges to convening the NEEAC during 2010-2011

OEE provided written explanation and also directly discussed with OIG how and why the specific funding structure of the Act and certain funding levels create obstacles to certain program tasks.

As Special Government Employees, the NEEAC members are required to be paid. OEE's funding is strictly apportioned by law. OEE does not receive specific funding for Section 9 of the Act which outlines the duties and responsibilities of the NEEAC. Rather, Council member salaries and support for NEEAC operations are supported by the same funds that support OEE operations per Section 4 of the Act.

This section of the Act provides for 25% of OEE's appropriated budget to be used for payroll for Headquarter and Regional staff, the President's Environmental Youth Award (PEYA) Program, required and optional staff training, contract support, staff travel, and NEEAC salaries and operations, among other things.

Because the program was supporting a greater number of FTEs in 2010 and 2011, this portion of the budget did not provide sufficient funding for NEEAC support. Financial data previously provided to and discussed with the OIG corroborate this. The NEEAC was fully re-empaneled in 2012 when the budget allowed for support of NEEAC salaries and operations. It has continued to be empaneled since that time.

2.2.2   Challenges to consistent production of a biennial NEEAC report

The NEEAC has faced significant challenges to producing a report every two years, unrelated to the aforementioned budgetary constraints. As discussed below, the complex nature of environmental education combined with the turnover of membership, the prescriptive nature of the NEEAC membership, and the lengthy FACA process, present challenges to preparing a report every two years.

The Act requires a report to Congress that assesses the field of environmental education at the national level every 2 years. Environmental education is a complex, multi-faceted discipline, much of which occurs outside of the national school system. As OEE has discussed at length with OIG, conducting a comprehensive assessment of the EE field at a national level is much more difficult than, for example, conducting an assessment of a subject such as mathematics

education in the country. Most assessment of that nature happens within the formal school system and is therefore able to be assessed by looking at the results of standardized tests. Gaining an expert understanding of the field and the current status of its components take significant time. This presents a challenge to the NEEAC in light of the frequent turnover of members, a lengthy FACA process under which the council must operate, and an every two year report deadline.

Over the course of the NEEAC's existence, members have had variable length terms. In some cases, changes in eligibility (for example, due to a job change) have resulted in turnover during the process of attempting to write each report. Due to the prescriptive nature of the Act, requiring that members of the Council represent specific sectors,[vii] as well as the multistep process for hiring, filling each seat can take a significant period of time. This turnover has made it difficult for the NEEAC as a whole to regularly conduct a national assessment of the field.

In addition, although OEE provides the financial and administrative support for organizing meetings, because the NEEAC is an independent consulting body, OEE informs the NEEAC members of their responsibilities and encourages the members to adhere to the predetermined schedule for developing reports. Per FACA guidance, OEE cannot dictate the methodology the NEEAC must use to apply their independent judgement to assess the field and cannot otherwise interfere with the Council's work.

2.3   *Impact of the NEEAC reports*

Despite the challenges facing the NEEAC over recent years, the NEEAC continues to operate as an important advisory body and a valuable source of information to the field of EE through its reports. The recommendations in the NEEAC reports contribute to a larger body of knowledge for the EE field and they are not time-limited. The best practices within NEEAC reports continue to be useful beyond a 2-year timeframe, as EE organizations (including OEE) look to the NEEAC as one of many resources to inform and enhance the field of EE.

Based on the evidence that OEE previously provided to and discussed with the OIG, and provides here in response to the report findings, we do not believe that a lapse of 2 years for the NEEAC was, or is, in any way detrimental to the operation and management of the office or efforts to strengthen, professionalize, and diversify the field of environmental education.

OIG Response to Part 2 of Agency Comments - Discussion and Findings Related to the National Environmental Education Advisory Council.

- *Addressing NEEAC Recommendations:* OEE is not required to implement NEEAC recommendations. The OIG report states: "Although the Federal Advisory Committee Act does not require council recommendations to be acted upon, GAO internal control standards require that the findings of audits and other reviews be promptly resolved. As such, the EPA should promptly review and resolve NEEAC recommendations and communicate that to the council." Resolution does not mean that the EPA must implement the recommendations, but it should have a documented resolution for recommendations. We modified the report and Recommendation 1e to require OEE to resolve NEEAC recommendations.

- ***Recommendations to the Administrator:*** OEE states that the best practices recommended by the NEEAC in the 2005 NEEAC report are valuable to the environmental education field. OEE also states they are not required to do so, but have taken many steps to support those recommendations through its strategic planning and programming. The NEEAC recommendations are intended to improve the entire environmental education field; however, we believe the EPA is key to either initiating or providing leadership for NEEAC recommendations.

- ***Evidence of Improved Environmental Literacy and Stewardship:*** OEE states completion of research initiatives are indicators of success. The completion of initiatives indicates that funds were spent. To judge success, the EPA needs to capture performance data as outlined in the act and program office strategic plan. As the OIG report states, OEE cannot demonstrate to what extent the investment in such initiatives has improved environmental literacy and stewardship.

- ***Analyzing Grant Performance Data***: OEE monitored educators' ability to teach environmental concepts through adherence to Office of Grants and Debarment requirements. OEE may have satisfied the Office of Grants and Debarment, but has not captured the performance information described in its strategic plan. The implementation of the grant does not mean that the grant program was a success. OEE should capture and analyze performance data identified in the strategic plan, and that plan should align with the agency plan.

- ***Terms of NEEAC Members:*** OEE said the OIG incorrectly stated the term of the NEEAC members. However, the terms are from the act and codified in P.L. 101-619 §(9)(b)(4), and state that each member of the Advisory Council shall hold office for a term of 3 years.

- ***Convening the NEEAC:*** OEE stated that the NEEAC was not fully empaneled only from 2010 to 2011 due to a lack of resources. Although members may be identified, they cannot carry out their duty if they are not convened. We made changes to the report to show that the NEEAC was not convened after 2005 until 2012. OEE states there was only a lapse of 2 years for the NEEAC, and that the NEEAC recommendations are good for 2 or more years. To be more accurate, the NEEAC meeting minutes from December 2012 recorded that the then Deputy Associate Administrator for External Affairs and Environmental Education said the last time the NEEAC was seated was 2005, a 7-year gap, and the OEE said that no one was hired or paid during that period. A NEEAC report had not been produced for 10 years (2005–2015). Additionally during that time, the NEEAC did not report on the state of environmental education.

3.   DISCUSSION AND FINDINGS RELATED TO PROGRAMMATIC PERFORMANCE REPORTING, ASSESSMENT AND STRATEGIC PLANNING

3.1   *Programmatic performance reporting and assessment of individual OEE programs*

In its report, OIG asserts that OEE did not obtain program performance data and report results and that OEE did not assess its program performance as defined in EPA, OMB, and the U.S. Government Accountability Office guidance, due to lack of internal controls.

OIG also asserts that OEE lacks performance reporting requirements for grantees that are connected to strategic measures.

OEE Response Overview:

OEE maintains that we have continuously collected and assessed performance data for the EE grants and the teacher training cooperative agreement program according to the requirements and best practices of OGD.

OEE maintains that the office adheres to required policies and has extensive internal controls in place. In response to the guidance cited in the OIG report, OEE does not believe it is subject to many of the reporting requirements relating to national program management, the *Government Performance and Results Act (GPRA) Modernization Act (GPRAMA)*, and strategic planning. The many requirements and standards of practice to which OEE adheres differ from those cited by OIG as discussed below. However, OEE recognizes the intent of each policy and implements many of their best management practices.

OEE firmly believes that there is a direct correlation between the performance reporting requirements for projects funded under EE grant programs, OEE's strategic goals and educational priorities, and the Administrator's strategic goals and priorities.

3.1.1   *Obtaining data and assessing program performance data*

OIG asserts that OEE did not obtain and assess program performance data and report results.

It is incorrect to say that OEE does not obtain and assess program performance data. OEE has monitoring provisions in place for each component of its programming.

As part of its investigation, OIG asked OEE:

> "How does the OEE measure performance? Please provide your program office metrics and outcomes for the 5 goals and objectives as outlined in the strategic plan since the current (2006) went into effect."

OEE's in-depth response identified all of our performance metrics and outcomes for the goals and objectives in the 2006-2011 strategic plan.[viii]

OEE also specifically discussed at length with OIG how we have collected and assessed data for each grant and each cooperative agreement awarded, according to the requirements and best practices set forth by OGD.[ix] These requirements include quarterly, annual and final reports from grantees, budget analysis, cost justification reviews, and baseline and advanced monitoring, including site visits. For his or her assigned grants, each Project Officer is responsible for reviewing all of the work plans and reports, tracking performance measures, assessing if the grant was successful in meeting its goals, objectives and performance measures, and sharing this information with the OGD and OEE management as requested.

OEE acknowledges that while we have collected and assessed data for specific programs, we have not aggregated those data and reported comprehensive results in a formal manner. As discussed in Section 3.2, there are significant challenges associated with conducting this type of

comprehensive assessment given the extraordinary range and scope of activities and the complexities of combining disparate data into a coherent whole. OEE has, however, compiled grant data in an internal grants database, and we post summary statistics on our website for each grant cycle.[x]

3.1.2 *Adherence to Agency and other policies regarding performance assessment and reporting*

OIG asserts that OEE did not assess its program performance as defined in EPA, OMB and the U.S. Government Accountability Office guidance.

This finding, that OEE did not report performance data as defined by the federal laws and Agency policies noted in the report, is misleading. With the exception of the Paperwork Reduction Act, these policies do not apply to OEE.

3.1.2.1 Grant monitoring and reporting

As discussed in Section 3.1.1, we comply with OGD requirements for reporting performance results on grant and cooperative agreement programs. Project Officers (POs) on grant management and programmatic progress through reporting required by OGD via IGMS. The individuals in OEE and the Regional EE Coordinators acting as Project Officers (POs) have been trained and certified by EPA's Office of Acquisition and Resource Management, and maintain their status according to OARM's requirements. OEE previously requested that the OIG identify specific areas of non-compliance with grant results reporting under OGD, and OIG has provided no specific evidence of non-compliance on the part of OEE.

In the report, OIG raises the question of the role of National Program Manager (NPM). It should be noted that per OGD ([http://www.epa.gov/planandbudget/national-program-manager-guidances)](http://www.epa.gov/planandbudget/national-program-manager-guidances), OEE is not identified as a "program office" with an NPM. As such, OIG's assertion that OEE is not meeting the federal and Agency NPM reporting requirements is inaccurate.

3.1.2.2 Government Performance and Results Act (GPRA) Modernization Act (GPRAMA)

GPRAMA is focused on strategic plans and performance measures at the Agency level. Staff from the Office of the Chief Financial Officer (OCFO) stated to OEE in an email that "neither GPRA nor GPRAMA require specific programs to develop performance measures." However, although there is no requirement for OEE to have a strategic plan and associated performance measures, the office has utilized strategic frameworks and performance measures since shortly after its establishment to prioritize and guide work and in support of Agency-level obligations.

As discussed above in Section 3.1.1, OEE provided an in-depth written response to OIG identifying all of the performance metrics and outcomes for the goals and objectives in the 2006-2011 strategic plan.

3.1.2.3 Environmental results under EPA assistance agreements: EPA Policy 5700.7.A1

It is EPA policy, to the maximum extent practicable, to:
  (1) link proposed assistance agreements to the Agency's Strategic Plan;
  (2) ensure that outputs and outcomes are appropriately addressed in assistance agreement competitive funding announcements, work plans and performance reports; and
  (3) review the results from completed assistance agreement projects and report on how they advance the Agency's mission of protecting human health and the environment.[xi]

Every RFP issued by OEE requires that proposed grant activities be linked with the Agency's strategic plan. Every applicant must develop, implement, and report on the outputs and outcomes in their work plans and performance reports.

At the start of each grant or cooperative agreement, the Project Officer or EE Grants Manager assesses how the proposed project will advance the Agency's mission and enters that information into the Integrated Grants Management System (IGMS). At the conclusion of each grant or cooperative agreement, the Project Officer reviews the results of these projects as reported in the grantee's final report and files the reports with OGD through IGMS.

3.1.3   *Additional internal program controls*

The IG asserts OEE "lack[s] internal program assessment controls" citing the Standards for Internal Control in the Federal Government (http://www.gao.gov/assets/670/665712.pdf) as a basis.

OEE disagrees with this finding. In addition to those cited above, OEE has other internal program assessment controls in place to report on programmatic and managerial operations.

Through the multi-year Program Review Strategy and letter of assurance, the Associate Administrator for the Office of Public Engagement and Environmental Education (OPEEE) reports to Agency senior management on internal controls for programmatic and management operations as required by the Federal Managers Financial Integrity Act (FMFIA). OEE provided the most recent and previous FMFIA submissions to OIG as supporting documentation. These submissions consistently certify the effectiveness and efficiency of operations in OEE and compliance by OEE with applicable laws and regulations.

The most recent FMFIA submissions (for 2015) stated that "…OPEEE complies with the Federal Managers Financial Integrity Act requirements, and the internal controls within OPEEE are adequate to reasonably ensure the protection of the programs, operations, functions and resources…against fraud, waste, abuse, and mismanagement." Previous reports supported this conclusion as well. The current Program Review Strategy for FY 2016-2018 indicates OEE is at low risk for waste, fraud and abuse for all control objectives.

As an additional layer of internal management control, OPEEE is led by a senior executive, whose performance is reviewed at mid-year and end-of-year and assessed in areas that are inclusive of financial responsibility, risk, and accountability.

Furthermore, OPEEE has an annual planning meeting (as do all AO offices) with the Chief of Staff and the Deputy Chief of Staff for the AO during which the current year's budget priorities and activities and the prior year's programmatic accomplishments and challenges are reviewed and discussed.

Additionally, working in conjunction with the Regional Offices, OEE has developed several Standard Operating Procedures (SOP) for the office, including one for the grants and awards programs (developed in mid-2014 and provided to the OIG in January 2015). These SOPs outline the design, implementation, and administration of OEE programs and help ensure consistency with respect to a number of program functions and processes.

Finally, individuals acting as Contract Officer Representatives are trained and certified according to requirements from OARM.

All of these internal controls help ensure timeliness, cost-effective and efficient program implementation, compliance with applicable laws and regulations.

3.1.4   _Connection of grantee performance reporting requirements to strategic measures_

OIG asserts that OEE lacks performance reporting requirements for grantees that are connected to strategic measures.

OEE maintains that performance reporting requirements, connected through each RFP and subsequent work plan to Agency and OEE strategic measures, are well defined in both the RFP and in the Terms and Conditions of each award.

As discussed below, OEE firmly believes that there is a direct correlation between the outputs and outcomes of projects funded under EE grant programs, OEE's strategic goals and educational priorities, and the Administrator's strategic goals and priorities.

Each RFP posted since the beginning of the EE Grants Program outlines the programmatic performance reporting requirements for the grantees, including outputs and outcomes. With each award agreement, the grantee is provided a set of Terms and Conditions that states that every grantee must report on how those priorities and goals are being met. The Terms and Conditions also include the detailed financial and other administrative monitoring requirements established by OGD. The RFP is reviewed and edited by both OGD and EPA's Office of General Counsel (OGC) prior to publication to assure OEE is using all required language.

The following is the Performance Reporting Requirement within the FY 2014 RFP for the EE Grants Program:

> "During the evaluation process for proposals, EPA will determine if each work plan contains well-defined outputs and outcomes, adequately describes the applicant's plan and approach for tracking and measuring progress, and clearly explains how the applicant will achieve the expected outputs and outcomes. Proposed outputs and short-term outcomes must be completed and be reported to EPA within the project period. Progress should at least begin on medium-term or

long-term outcomes during the project period. For more detailed information on expected outputs and outcomes from environmental education grants, please see Appendix D."

Additional language from Appendix D of the RFP:

"Grant proposals must clearly define measurable quantitative or qualitative outputs that can be reported during the funding period. After the project is implemented, grant recipients are required to submit to EPA status reports about their progress in achieving educational and environmental outputs and outcomes according to the terms and conditions outlined in the award."

3.1.4.1 *Linking Outputs and Outcomes From Grant Projects to Strategic Measures*

EE Grant RFPs specifically require all applicants to demonstrate how their proposed projects will address at least one of OEE's educational priorities, at least one of the Administrator's environmental priorities, and at least one of the Agency's strategic goals. Each RFP is reviewed by OGD and OGC to insure that appropriate language is included.

An application would be deemed ineligible if it did not adequately demonstrate a connection between the outputs and outcomes of the proposed activity, and the priorities and goals of OEE and the Agency as discussed above. As discussed in earlier in Section 3, a grantee's progress towards achieving these outputs and outcomes must be reported to the Project Officer through regular reporting during and upon completion of the project period. EE's strategic goals and educational priorities, as well as the Administrator's priorities and Agency goals, are outlined in the chart below.

OEE Goals
The goals outlined in OEE's 2006-2011 strategic plan are:
> Goal 1: Promote the use of EE in schools and communities to improve academic achievement and stewardship
> Goal 2: Increase the capacity of states to develop and deliver comprehensive statewide EE programs
> Goal 3: Promote research and evaluation that assess the effectiveness of EE in improving environmental quality and student achievement
> Goal 4: Improve the quality, access and coordination of EE information, resources and programs
> Goal 5: Promote and encourage environmental careers

OEE Educational Priorities
As stated in all EE Grant RFPs, applicants must address at least one of the following OEE Educational Priorities in their proposals:
> 1) EE Capacity Building
> 2) Education Advancement
> 3) Community Projects
> 4) Human Health and the Environment
> 5) EE Teaching Skills
> 6) Career Development

Agency Strategic Goals
As stated in all EE Grants Program RFPs, applicants must address at least one of the following Agency Strategic Goals (from EPA's current strategic plan) in their proposals:
> Goal 1: Addressing Climate Change and Improving Air Quality
> Goal 2: Protecting America's Waters
> Goal 3: Cleaning Up Communities and Advancing Sustainable Development
> Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution
> Goal 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance

Administrator Priorities /Themes
As stated in all EE Grant RFPs, applicants must address at least one of the following Administrator Environmental Priorities/ Themes in their proposals:
> 1) Addressing climate change and improving air quality
> 2) Taking action on toxics and chemical safety
> 3) Making a visible difference in communities across the country
> 4) Protecting water: a precious, limited resource
> 5) Launching a new era of state, tribal and local partnership.

Those priorities and goals listed in the RFPs are all linked to OEE's strategic goals as follows:

OEE Goal	OEE and Agency Strategic Measures Addressed by OEE Goal
OEE Goal 1	OEE Educational Priorities 1-5, the Administrator's Environmental Priority 3, and the Agency's Strategic Goals 3 and 4.
OEE Goal 2	OEE Educational Priorities 1 and 2, the Administrator's Environmental Priorities 3 and 5, and the Agency's Strategic Goal 3.
OEE Goal 3	OEE Educational Priorities 1, 2 and 5, all the Administrator's Environmental Priorities, and the Agency's Strategic Goals 1, 2, 3 and 4.
OEE Goal 4	OEE Educational Priority 1-5, all the Administrator's Environmental Priorities, and all the Agency's Strategic Goals.
OEE Goal 5	OEE Education Priority 6, the Administrator's Environmental Priority 3, and the Agency's Strategic Goals 1, 2, 3 and 4.

To further demonstrate and track the connection between EE grant projects and OEE and Agency Strategic measures, OEE requires that applicants develop a logic model as part of their application. The logic model is a tool to correlate their outputs and outcomes with education and environmental priorities and goals. Below is the example of the Logic Model from the FY 2014 EE Grants Program RFP.

Sample Logic Model of PROJECT PERFORMANCE MEASURES (examples of outputs and outcomes for various types of model EE projects)			
OUTPUTS		OUTCOMES	
Short-term	Short-term	Medium-term	Long-term
Recruitment of teachers, students, or other target audience	Increased access to environmental education resources and programs	Changes in awareness about issues and decisions that affect the environment	Establishment of sustainable environmental education programs
Training Workshops/Clinics Courses	Students and teachers learn skills	Students and community leaders make decisions to improve their environment	Improved environmental literacy and environmental change for the better

Field Trips	Increased environmental knowledge	Specific actions are taken to improve the environment	Increased stewardship leads to civic responsibility for environmental protection, habitat preservation, and prevention of environmentally induced human health problems.
Educational Materials	Increased motivation to become stewards and protect habitat and the environment	Environmental stewardship is underway	
Videos, CDs, DVDs, web sites			
Conferences and presentation of results	Educators are motivated to train others	Assessment of actions to improve the environment; Measuring success	
	Assessment of learning; measuring success		

In conclusion, OIG's assertion that OEE lacks performance reporting requirements for grantees that are connected to strategic measures is unfounded. As OEE has shown, performance reporting requirements for grantees are well-defined and clearly outlined in each RFP as well as in the Terms and Conditions of each award. In addition, the outputs and outcomes that each grantee is required to track and report are directly correlated with OEE's strategic goals and performance measures, and Agency priorities and goals.

3.2   *Comprehensive Program Analysis of EPA's EE Programs*

OIG asserts that no comprehensive program-level analysis has been done by OEE and the ultimate impact of funds on OEE's program performance and goals therefore cannot be determined.

OEE Response Overview:

OEE disagrees with this finding. OIG's finding that OEE has not aggregated data across the program is correct. However, it is incorrect to say that the ultimate impact of funds on OEE's program performance and goals cannot be determined due to an absence of a formal comprehensive program analysis. Each program element has been extensively monitored, with data collected and analyzed as discussed throughout this report. The strong monitoring activities, controls, and individual program reporting requirements that are in place provide sufficient evidence to infer that OEE is progressing towards our goals.

At a micro-level, OEE believes that success for each of its program elements indicates success and impact for OEE in advancing environmental literacy and environmental improvement as outlined in our strategic goals. Our grants have benefited the organizations and the communities in which the projects operate, which is by law what grants must do. A grant that involves any sort of clean-up is improving the environment for a community, locally or on a larger scale, while helping to achieve an Agency strategic goal. Similarly, a grant that involves students

planning and implementing a community service project, such as an energy audit, is improving the environment in a quantifiable way. None of the 3645 EE grants have failed to produce results. That represents success and impact for each grant as well as for the grants program as a whole.

The teacher training program has provided professional development opportunities to thousands of formal and non-formal educators and has provided standards of excellence and improved access to information, resources and research. The program increases the capacity of teachers to provide environmental education programming to students and adults, which can lead to increases in environmental literacy for all. Each teacher we have reached impacts their 'students' by increasing their environmental knowledge. Collectively these increases in environmental knowledge and literacy represent the impact and success of the teacher training program. This teacher training program is small compared to other national-level EE teacher training programs such as Project Learning Tree or Project WILD, but shows a strong multiplier effect that is tracked each year for each initiative. The development of standards of excellence through this program have changed the face of EE from materials development to pre-service teacher training.

At the macro-level, OEE has always implemented the major programs required by the Act (the EE Grants and Teacher Training Programs) and to the extent practicable, the other programs when funding is available, in a timely manner and with adherence to federal and agency laws, regulations and policies. All staff members have knowledge, experience, expertise and certifications appropriate to their responsibilities. OEE adheres to all applicable reporting requirements and adheres to the fund allocation formula prescribed by the Act.

Overall, OEE believes that we implement and manage impactful programs. OEE impacts the field of environmental education, environmental literacy and environmental protection through support for organizations that provide EE to many different audiences using EE methodologies and practices appropriate for each unique activity, project or community. Every year we get requests for funding that far exceed our ability to provide support. In the future, OEE will consider publishing an accomplishment report to aggregate and highlight the impact the program has made.

3.2.1   *Paperwork Reduction Act limits on collecting standardized information*

Regarding the OIG discussion of the impact of the Paperwork Reduction Act, OEE's ability to collect certain types of data relevant to this type of assessment is limited without additional documentation (OMB permission).
The Paperwork Reduction Act (PRA) was enacted to minimize the paperwork burden for individuals; small businesses; educational and nonprofit institutions; Federal contractors; State, local and tribal governments; and other persons resulting from the collection of information by or for the federal government.[xii] The PRA generally provides that every federal agency must obtain approval from the Office of Management and Budget (OMB) before using identical questions to collect information from 10 or more persons.

The difference between what the Office of Environmental Information has stated to OIG and the guidance OEE has received from OGC and OGD is at best ambiguous and at worst contradictory. On page 8 of its report, the OIG indicates, "The Office of Environmental Information further stated that the EPA has OMB permission to collect the data on grants it needs without violating the Paperwork Reduction Act." OEE's understanding of the PRA, as informed by OGC, is that we are not permitted to dictate how grantees measure their programs or to ask more specific evaluative questions without having an Information Collection Request (ICR) in place. Our understanding is that without an ICR, we are prohibited from requiring grantees to complete a standard form or prescribing how or what to measure. The information cited by OIG on page 8 regarding the National Estuary Program provides useful context. However, because (according to OIG) the National Estuary Program implements cooperative agreements, it is not clear whether this example is applicable to OEE's situation. Clarification should be sought about whether the distinction, if any, between ICR requirements for cooperative agreements and grants is relevant. As OEE weighs the feasibility, discussed within Section 3.1.1.2, to conduct a long-term, large scale synthesis of data on grant program performance, we will continue to seek to clarify the applicability of the PRA.

On behalf of OEE, OGC is reaching out to OEI to inquire about ICR's for other similar grant programs with interests in comprehensive evaluation.

3.2.2   *Challenges with a comprehensive assessment of the impact of educational projects on environmental literacy*

The standard for research on how education impacts people's lives is to implement longitudinal research studies that follow a defined audience using a specific methodology to impart learning over a stated time period. This type of research is a multi-year undertaking and is extremely complex and costly to conduct. OEE has not been in a position to commit to this type of long-term resource commitment given the funding uncertainties from year to year.

As noted above, in order to perform a longitudinal synthesis of the impact of the grant program on environmental literacy, OEE would need to request more detailed and standardized information from grantees than what is currently collected. If OEE were able to collect more detailed data across the grant program, significant challenges would still remain with respect to aggregating and synthesizing the data. The EE grant program allows for a range of environmental and educational priorities and activities, targeting different audiences, and reflecting different environmental education (EE) methodologies and practices. OEE has attempted in the past to normalize data and analyze results across the widely varied range and scope of grant activities. The diversity among project goals, audiences, and methodologies continues to make it very difficult to aggregate and synthesize the results in a meaningful way.

Despite these challenges and the fact that OEE has not been in a position to commit resources over the long term, the office is working with other EE leaders to address the issue of synthesizing diverse EE data in such a way as to be able to draw conclusions about EE program impacts overall. OEE also is continuing to strive for improved ways to convey the impact of its EE programs. Very recently, OEE initiated a small pilot project to look at how data from the grants might be aggregated to allow inferences to be made about the impact of its grant activities

on specific targeted audiences. OEE has also entered into an Interagency Agreement (IAG) with the Fish and Wildlife Service (FWS), the North American Association for Environmental Education (NAAEE) and Stanford University on a research project (*Anecdotes to Evidence: Highlighting the Value and Impact of EE*) to demonstrate the impact and value of EE by substantiating anecdotes from across the field with empirical evidence in such areas as student achievement, conservation and environmental quality, and connecting people to nature.

3.3   *Strategic Planning*

OIG asserts that OEE did not implement its strategic plan program performance measures that the current performance measures are outdated, and that OEE lacks an updated strategic plan.

OEE Response Overview:

OEE conducted all the strategic plan program performance measures for the previous strategic plan, as identified in written and verbal responses to OIG.

As previously stated, OEE provided a detailed response document to this IG question:

> *How does the OEE measure performance? Please provide your program office metrics and outcomes for the 5 goals and objectives as outlined in the strategic plan since the current (2006) went into effect.*

This response indicates the performance measures for each goal and objective outlined in the 2006-2011 strategic plan.

As discussed in detail below, OEE has initiated the process for developing a new strategic plan with updated goals, objectives, and performance measures that will be reviewed by our expert stakeholders.

As discussed in Section 3.1.2.2, OEE is not required to create and implement a strategic plan. OEE does so to help direct the program's limited funding to support environmental education at the national, state, tribal, and local levels.

OEE is currently in the process of updating its strategic plan to extend to 2021. As OEE discussed with OIG, the goals in the previous strategic plan are still valid, even though the report's end date was 2011. Some of the objectives and related outputs, outcomes and performance measures, however, have changed since 2011. This includes a new grantee to operate the teacher training program beginning in 2012 and the termination of the National Network for Environmental Management Studies (NNEMS) Fellowship program in 2013, due to lack of Agency funding.

A formal review and update to the strategic plan could not be implemented until OEE had a permanent Deputy Director in place following several temporary managers in the position. The current Deputy Director was made permanent in the spring of fall2015. In addition, because the NEEAC was close to completing its next report, it would have been shortsighted for OEE to

initiate a new strategic planning process in absence of pending NEEAC recommendations. In the fall of 2015, OEE initiated the process for developing a new strategic plan with updated goals, objectives and performance measures that will include input not only from experts in the EE field both within and outside the federal government, but also from the Office of Management and Budget. The formation of the updated strategic plan will be informed by assessment of OEE performance under the previous plan and assessment of the appropriateness of continuing to include earlier objectives and performance measures.

We expect the new, vetted plan to be completed in 2017 and to apply to the 2017-2021 period. OEE will review and update the plan when warranted. For example, a significant change in the Agency's strategic goals might warrant a review of the strategic plan.

OIG Response to Part 3 of Agency Comments - Discussion and Findings Related to Programmatic Performance Reporting Assessment and Strategic Planning

- ***Applicability of Federal and Agency Requirements:*** OEE states it is not subject to federal and agency requirements listed in the report. The applicability of these policies are documented in the OIG report. We disagree with OEE's assertion.

- ***Aggregation of Data and Results:*** OEE states that it has not aggregated data and reported comprehensive results given the extraordinary range and scope of activities and complexities of combining disparate data into a coherent whole. Absent such analysis and corresponding reporting, the program office cannot offer assurance that the public funds they spent contributed to program goals and objectives.

- ***Grants and Debarment Data:*** OEE states that it assessed grant performance data to satisfy some Office of Grants and Debarment requirements. However, OEE also stated this effort did not aggregate data and report comprehensive results for the overall program.

- ***Compliance with EPA Grant Policy:*** OEE states that it complies with EPA grant policy by tying outputs and results to the agency strategic plan. However, OEE states that it has not aggregated and reported on the comprehensive program results.

- ***Internal Controls:*** OEE states it has internal controls. However, we found those controls are not sufficient to assess the effectiveness of the program.

- ***Inferred Success Through Funding:*** OEE states that although it has not aggregated data and reported on comprehensive results, program success can be inferred based upon its funding of various activities. We disagree that expenditure of funds is an adequate proxy for program effectiveness.

- **Program Office Responsibility:** OEE states that it is not identified as a "program office" with a National Program Manager and, as such, OIG's assertion that OEE is not meeting the federal and agency National Program Manager reporting requirements is inaccurate. However, in the report, EPA Order 5700.7A1 states program offices and National Program Managers must ensure competitive funding announcements, work plans, funding recommendations and performance reports contribute to the agency's programmatic goals and objectives. Assistance agreements should demonstrate achievement of environmental results and/or public health protection and their results should be reviewed and reported. Therefore, we believe the order applies to OEE.

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4. OEE INVESTMENT IN RESEARCH INITIATIVES

OIG asserts that OEE cannot demonstrate to what extent the investment in such [research] initiatives has improved environmental literacy and stewardship.

OEE Response Overview:

As discussed briefly in Section 2, OEE's investment in research is based on a best practice recommended by the NEEAC. OEE's research initiatives since 2005 provided support for the establishment of fundamental data needed to begin broad scale evaluation of environmental literacy within the United States and to investigate the connection between a specific environmental education methodology and its impact on environmental quality. Since 2005, OEE's research initiatives have provided support for the establishment of fundamental data to begin broad scale evaluation of environmental literacy rates within the United States and to investigate the connection between environmental education and its impact on environmental quality.

Increased environmental literacy and environmental quality–two essential components of environmental education–can be enhanced by promoting research and evaluation that address the effectiveness of environmental education in progressing towards these ends. As OEE discussed with OIG, the research needs of the field of environmental education relate to the need to develop a more comprehensive and cohesive understanding about how and where environmental education could be improved to increase environmental literacy. OEE has addressed this need by collaborating with partners to develop a National Environmental Education Research Agenda. In collaboration with EE researchers, providers, practitioners and policy makers, this Agenda was created to initiate, collect and assess empirical research to identify the strengths and weaknesses in the field, thereby allowing the field to evolve and improve as new information, practice, methodologies and technology are introduced. The Agenda is one of the outputs of OEE Goal 3: Promote research and evaluation that assess the effectiveness of EE in improving environmental quality and student achievement. The findings and results of the 2 research projects discussed below are tied directly to the National EE Research Agenda.

These studies indicate that environmental education is improving environmental literacy and is helping to improve the environment. They provide baseline data for other work and/or evidence of a causal relationship. They evidence a connection between education and local environmental outcomes. They also promote understanding, improve practice and track improvements in environmental literacy and environmental stewardship.

4.1   *The National Environmental Literacy Assessment Project*

This project was initiated through a cooperative agreement with the National Oceanic and Atmospheric Administration (NOAA) and implemented by the Center for Instruction, Staff Development and Evaluation (CISDE) at Southern Illinois University. The research provides baseline data on the environmental literacy rates of middle school students around the country.[xiii] It gives the field a 'starting point' for additional research. Without baseline data we would not be able to tell if, and by how much, environmental education programming increased, decreased or

had no notable effect on environmental literacy rates. The initial phase of this research study showed that middle school students who received dedicated environmental education programming in school had higher rates of environmental literacy than those students who had not had dedicated environmental literacy programming. OEE funded the initial phase of the project, and NOAA funded the subsequent phases (2-4). The final phase of this project has not received funding due to resource constraints in both agencies.

4.2 *Quantifying the Relationship between Place-based Learning and Environmental Quality*

This research study, one of a small number of such studies done globally, was designed to find and quantify the link between environmental education programming and improved air quality at the local community level.[xiv] The research suggests that certain types of air quality education programs can have measurable impacts on either actual air quality or factors that are likely to improve air quality.

> **OIG Response to Part 4 of Agency Comments - OEE Investment in Research Initiatives**
>
> - OEE states that prior initiatives will establish a baseline for other work and/or evidence of a causal relationship. We acknowledge that OEE is taking steps to assess the effectiveness of its initiatives.

5. REPORT CONCLUSIONS
In its report, OIG concludes that:

1. OEE is significantly impaired it its ability to provide evidence of results and instill confidence that it has the capacity to properly manage the environmental education program and the program's significant grant funds;
2. OEE did not execute its strategic plan or NEEAC recommendations that would have enabled an evaluation of program results and performance; and
3. Improved program management and oversight controls are needed for program accountability and budget justification and to reduce and manage the current risk of fraud, waste and abuse.

EPA Response Overview:

EPA respectfully disagrees with the above conclusions. We believe that the report as a whole does not provide evidence to support many of the findings and conclusions. The report indicates an apparent lack of understanding on the part of OIG about OEE's mission and mandate, how performance is measured, and the purpose, function, and authority of the NEEAC. Throughout the OIG investigation and summarized within this response, EPA believes this response (and responses previously submitted to OIG) provides sufficient information and credible evidence to refute many of the report findings and conclusions. EPA is confident that the continued positive performance of EE program components is indicative of OEE's overall success in advancing environmental literacy and stewardship.

While there are some areas for improvement, EPA finds no basis for OIG's assertion that the program is at high risk for waste, fraud, and abuse due to a lack of controls and performance reporting. This assertion goes well beyond what is substantiated in the report. Office reviews indicate that EPA senior management continues to be confident in OEE's ability to properly manage the environmental education program. EPA respectfully requests that OIG remove these arguments from its report.

In response to OIG's specific conclusions, EPA has demonstrated within this report that OEE collects and assesses performance data for EE grant programs and reports to the pertinent offices, as required. OIG has not provided evidence that OEE is not performing according to the standards and requirements set by the Agency, including OGD. OEE has also demonstrated that it continues to evaluate performance based on measures in the strategic plan and has implemented NEEAC recommendations, though not required to do either. The strong monitoring activities, controls, and individual program component reporting requirements that are in place provide sufficient evidence to infer that OEE is progressing towards its goals, and that those goals strongly correlate with those of the Agency.

Since its creation in 1992, OEE has implemented grant programs that have received positive acknowledgement from OGD and OGC as being cost effective and efficient competition programs for the Agency; provided funding, direction and leadership to teacher training programs that have significantly impacted the field of EE; and implemented other programs in the Act when funding has been available. OEE has done this with a small number of full time employees including no more than 1 full time employee in each regional office, a relatively flat funding level, and under the constraints of a highly-prescriptive piece of legislation. EPA believes that it has provided the OIG with more than sufficient evidence that the EE program is a careful steward of public funds for environmental education.

Additionally, EPA believes that the environmental education program provides vital support for the mission of the Agency to protect human health and the environment in 3 ways:

1. Helping the public understand the purpose and need for rules and regulations and better understand the regulations themselves so that they can become active participants in EPA's regulatory development process;
2. Providing the public with the education and information they need to become stewards of our environment and providing an effective avenue for public engagement on the Agency's mission; and
3. Supporting EPA's 5 Strategic Goals with local community to national-level programming.

The establishment in late 2014 of the Office of Public Engagement and Environmental Education within the Office of the Administrator and the hiring of a permanent Deputy Director in OEE has elevated the organization and provided leadership stability and direction. This commitment to and elevation of the EE program are evidence of the Agency's confidence in the impact of environmental education and its contribution to EPA's mission.

In summary, EPA's Environmental Education program provide the public with the knowledge and tools they need to become active participants in the EPA's decision-making process and active stewards who take responsibility for their actions.

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OIG Response to Part 5 of Agency Comments - Report Conclusions

- OEE disagrees with the report conclusions and states it is helping the public understand the purpose and needs for rules and regulations, providing the public with education and information they need to become stewards of the environment, and supporting the EPA's five strategic goals with local community to national level programming. Nonetheless, OEE has not assessed the effectiveness of the program, and cannot show whether it has met the performance measures identified in its 2006 strategic plan.

- OEE asserts that the OIG holds the OEE accountable to different performance standards than the agency. The standards, program practices, EPA requirements or OMB initiatives are all public and accessible practices that support effectiveness and efficiency in government programs. Managing to achieve effective and efficient programs is endorsed by the EPA's cross-agency strategy to be a high-performing organization.

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6. REPORT RECOMMENDATIONS

Despite many noted factual discrepancies, overstatements, inaccuracies in OIG's findings and conclusions, EPA concurs (with explanation) with the majority of OIG's recommendations. Each recommendation is discussed below.

OIG recommends that the Associate Administrator for Public Engagement and Environmental Education:

1. Develop internal controls to ensure that:

   a. OEE obtains data linked to program performance objectives and goals.

   EPA concurs with explanation.

   OEE believes that it already obtains performance data as discussed earlier in this report and that data are linked to current program objectives and goals. As the next strategic plan is developed, OEE will continue to ensure that OEE's goals, objectives and activities with their associated outputs and outcomes, correlate with EPA's goals and priorities. OEE will continue to assure that performance data on progress towards these measures are obtained.

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OIG Response to Agency Comments to Recommendation 1a

Recommendation 1a is resolved. In April 2016, the EPA clarified its response and concurred. OEE will address this issue with the completion of the strategic plan in May 2017.

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b. OEE analyzes that performance data as part of routine program performance evaluation.

EPA concurs with explanation.

As discussed in detail above, EE projects are evaluated and reported as part of OEE's current internal reporting mechanisms to the Administrator. OEE will continue to assess the potential for more comprehensive analysis, as evidenced by the new pilot project to look at how data from the grants might be aggregated.

> **OIG Response to Agency Comments to Recommendation 1b**
>
> Recommendation 1b is resolved. In April 2016, the EPA clarified its response and concurred. OEE is conducting a new pilot project to look at how grant data can be aggregated and evaluated. The expected completion date is May 2017.

c. OEE annually, at a minimum, reports program performance progress on strategic plan goals and measures to the Administrator.

EPA concurs with explanation.

As discussed in Section 3, OEE already reports to the Administrator through multiple channels. OEE believes that we are complying with Agency policy for reporting performance results for the office.

> **OIG Response to Agency Comments to Recommendation 1c**
>
> Recommendation 1c is resolved and closed. In April 2016, the EPA clarified its response and concurred. OEE had an annual planning meeting with the Chief of Staff and the Deputy Chief of Staff for the Administrator, during which, in the context of the strategic plan and the Administrator's themes and priorities, the current year's budget priorities and activities, and the prior year's accomplishments and challenges, were discussed. This action was completed in March 2016.

d. NEEAC is continuously and fully staffed as required by the National Environmental Education Act of 1990.

EPA concurs with explanation.

OEE will continue to fully empanel the NEEAC as long as it has the resources available to do so.

> **OIG Response to Agency Comments to Recommendation 1d**
>
> Recommendation 1d is unresolved. OEE has funded the NEEAC in fiscal years 2015 and 2016; however, it would not be funded if the funding level is reduced to an unspecified threshold. That would cause the OEE to be willfully noncompliant with the act. In 2005, the NEEAC recommended that the EPA update the act to reflect 21st century issues, which include funding. However, the NEEAC recommendation is unresolved.

e. OEE promptly reviews and acknowledges NEEAC recommendations.

Recommendation 1e - OEE ensures that the NEEAC recommendations are promptly resolved and executes agreed-upon actions in a timely manner

EPA concurs with explanation.

As discussed in Section 2, OEE has always acknowledged and reviewed NEEAC recommendation in a timely manner. OEE will continue to do so again upon future reports.

Recommendation 1f. OEE ensures that the NEEAC recommendations are promptly resolved and executes agreed-upon actions in a timely manner

EPA disagrees and respectfully requests that OIG edit or delete this recommendation. Reason:

As discussed in Section 2, the NEEAC is an advisory council and as such, does not conduct audits or issue required actions for OEE or the Agency. OEE disagrees with OIG's characterization of the NEEAC recommendations as 'corrective actions."

However, as discussed, OEE believes that the recommendations for best practices made in the 2005 report are valuable to the EE field and has already taken steps to support these recommendations through its programming where appropriate. OEE will continue to use these best practices for guidance in its strategic planning.

OIG Response to Agency Comments to Recommendation 1e

Recommendation 1e was modified after discussion with the agency. The modified recommendation combines the former Recommendations 1e and 1f, and states "OEE ensures that the NEEAC recommendations are promptly resolved and executes agreed-upon actions in a timely manner." Because of the disagreement, we consider Recommendation 1e to be unresolved.

f.   NEEAC prepares and submits its biennial report to Congress as required by the National Environmental Education Act of 1990.

EPA concurs with explanation.

As discussed in Section 2, OEE cannot interfere with the work of a FACA committee towards its goal. However, OEE will make every effort to inform the Council of its responsibility and encourage the NEEAC to prepare and submit a report to Congress every 2 years. Resources permitting, OEE will continue to provide the necessary administrative support for the NEEAC to write and publish their report.

> **OIG Response to Agency Comments to Recommendation 1f**
>
> Recommendation 1f is resolved and closed. This action was completed in January 2016.

2. Implement procedures to periodically review and update the OEE strategic plan to ensure that performance objectives are relevant and actionable and deadlines met.

   EPA concurs with explanation.

   OEE is currently developing its strategic plan and associated measures per the timeline below. The plan will be reviewed and revised as warranted.

Timeline	
June 2015	Project Start: draft goals
July 2015	Reach out to strategic partners to discuss the 'process" for development
August 2015-May 2016	Prepare 1st draft and circulate to strategic partners and stakeholders
October – January 2017	Prepare additional drafts as needed and circulate to strategic partners and stakeholders
May 2017	Publish Final Strategic Plan

   > **OIG Response to Agency Comments to Recommendation 2**
   >
   > Recommendation 2 is resolved. In April 2016, the EPA clarified its response and concurred. OEE will address this issue with the completion of the strategic plan in May 2017.

3. Implement language in grant agreements that requires the recipient to report performance measures linked to OEE strategic program performance measures.

   > **OIG Response to Agency Comments to Recommendation 3**
   >
   > Recommendation 3 is resolved. In April 2016, the EPA clarified its response and concurred. OEE initiated a pilot project to look at the feasibility of aggregating and evaluating data from grant projects. The expected completion date is May 2017.

[i] National Environmental Education Advisory Council Charter. http://www.epa.gov/faca/national-environmental-education-advisory-council-charter-november-7-20

[ii] National Environmental Education Act. http://www.epa.gov/education/national-environmental-education-act

[iii] NEEAC. (March 2005) Setting the Standard, Measuring Results, Celebrating Successes: A Report to Congress on the Status of Environmental Education in the United States. http://www.epa.gov/sites/production/files/documents/reporttocongress2005_2.pdf

[iv] Documentation is available upon request.

[v] NEEAC. (2015) 2015 Report to the U.S. Environmental Protection Agency Administrator. http://www.epa.gov/education/national-environmental-education-advisory-council-2015-report-administrator-0

[vi] U.S. EPA (March 2012) Federal Advisory Committee Handbook http://intranet.epa.gov/faca/faca/guidance/2012_03_epa_faca_handbook.pdf

[vii] According to the Act, members of the Council must represent specific sectors:
- college and university (2 members);
- primary and secondary education (2 members);
- state departments of education and environment (1 member each);
- non-profit organizations (2 members);
- business and industry (2 members); and
- senior Americans (1 member).

[viii] Response provided December 19, 2014.

[ix] Information on the requirements and recommendations from OGD regarding grants management (including reporting and monitoring) can be accessed by contacting OGD or visiting their internal EPA website at http://intranet.epa.gov/ogd/.

[x] Summary statistics for the EE Grants Program are available on EPA's webpages for the EE Grants Program. https://www.epa.gov/education/environmental-education-ee-grants

[xi] EPA Order 5700.7A1. www.epa.gov/sites/production/files/2015-03/documents/epa_order_5700_7a1.pdf

[xii] U.S. EPA. Summary of the Paperwork Reduction Act. www.epa.gov/laws-regulations/summary-paperwork-reduction-act

[xiii] McBeth, William, Volk, Trudi L. (2009).The National Environmental Literacy Project: A Baseline Study of Middle Grade Students in the United States. *Journal of Environmental Education*, v41 n1 p55-67 2010

[xiv] Duffin, M., Murphy, M., & Johnson, B. (2008). *Quantifying a relationship between place-based learning and environmental quality: Final report*. Woodstock, VT: NPS Conservation Study Institute in cooperation with the Environmental Protection Agency and Shelburne Farms