



**Office of Inspector General
REPORT OF REVIEW**

**NORTH DAKOTA BLOCK GRANT
DECREASED ADMINISTRATIVE COSTS
AND DISCLOSED POTENTIAL BARRIERS**

E1FMG6-08-0019-6400069

July 24, 1996

**Inspector General Division
Conducting the Audit:**

**Region 8 Program Offices
Involved:**

**Central Audit Division
Kansas City, Kansas**

**Office of Technical and
Management Services**

**Office of Pollution Prevention,
State and Tribal Assistance**



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July 24, 1996

MEMORANDUM

SUBJECT: North Dakota Demonstration Block Grant
Decreased Administrative Costs and Disclosed
Potential Barriers
Report No. E1FMG6-08-0019-6400069

FROM: Bennie S. Salem *Bennie Salem*
Acting Divisional Inspector General
for Audit

TO: Jack W. McGraw
Acting Regional Administrator
Region 8

Attached is our special review report entitled *North Dakota Demonstration Block Grant Decreased Administrative Costs and Disclosed Potential Barriers*. We found that the North Dakota demonstration block grant successfully demonstrated administrative efficiencies and illustrated barriers to increasing resource flexibility and improving environmental performance. The report contains recommendations on jointly developing and agreeing on State environmental priorities, encouraging States to shift resources towards those priorities, and educating States on the benefits of developing outcome-based performance measures and assisting States in developing these measures. We summarized comments to the draft report and included the complete Region 8 and North Dakota Department of Health responses as Appendices I and II, respectively. We hope that our review results will assist you in building a successful performance partnership grant (PPG) program.

ACTION REQUIRED

In accordance with EPA Order 2750, you, as the action official, are required to provide us a written response to this special review report within 90 days of the final audit report date. For corrective actions planned but not completed by the response date, reference to specific milestone dates will assist us in deciding whether to close this report.

This special review report contains findings that describe issues the Office of Inspector General (OIG) has identified and corrective actions OIG recommends. This report represents the

opinion of OIG, and the findings contained in this report do not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established EPA audit resolution procedures.

We have no objections to the release of this report to any member of the public. This report contains no confidential business or proprietary information that cannot be released to the public.

Should you or your staff have any questions regarding this report, please contact me at (913) 551-7831 or Jeff Hart, Audit Manager in our Denver office, at (303) 312-6872. Please refer to the report number on all related correspondence.

Attachment

EXECUTIVE SUMMARY

PURPOSE

Region 8 awarded the North Dakota Department of Health (North Dakota) a 3-year demonstration block grant (block grant) in 1995 as part of an initiative to increase State flexibility, improve intergovernmental partnerships, and streamline processes. In 1996, the Environmental Protection Agency (EPA) sought authority to award performance partnership grants (PPG), similar to block grants, that would provide States and Indian Tribes the opportunity to combine funds, reduce administrative burdens and costs, strengthen EPA partnerships with States and Indian Tribes, and focus on environmental results. EPA obtained authority to award PPGs on April 25, 1996. North Dakota's block grant experience provided an opportunity to learn how States could effectively implement PPGs.

The purpose of our audit was to identify lessons learned from the North Dakota block grant that would assist EPA in building a strong PPG program. Our specific objectives were to determine whether:

- the block grant accomplished its intended purpose;
- grant performance measures were based on measurable, time-specific outcomes; and
- the Region had established oversight procedures for the block grant and for PPGs that allowed States a relatively high degree of autonomy to manage their environmental programs while providing adequate assurance that Federal funds were used efficiently and effectively.

BACKGROUND

North Dakota's fiscal 1995 block grant combined funding for nine environmental programs into one overall grant and totalled over \$2 million (Federal share). In fiscal 1996, the North Dakota block grant totalled about \$1.6 million (Federal share) as of February 21, 1996, and combined 10 environmental programs--the same 9 programs included in the 1995 grant award plus the drinking water program. The block grant was to provide North Dakota flexibility in how it managed and implemented environmental protection programs. Under the block grant, EPA reprogrammed State program grant funds--shifted money between programs funded in the Abatement Control and Compliance appropriations account--for North Dakota. North Dakota remained responsible for existing statutory, regulatory, and court-ordered requirements.

RESULTS IN BRIEF

North Dakota's block grant successfully demonstrated administrative efficiencies and illustrated barriers to increasing resource flexibility. North Dakota accomplished administrative savings under the block grant and used a conservative approach to obtain Regional and State staff confidence in the block grant and the PPG concept. The North Dakota block grant disclosed Regional internal turf battles and statutory restrictions as barriers to moving resources to address priority environmental problems. In addition, North Dakota staff continued to use traditional activity-based performance measures due to a lack of EPA guidance. Further, North Dakota staff did not see any benefit to developing outcome-based performance measures. EPA's new PPG interim guidance incorporated many of the lessons learned from the North Dakota block grant and provided steps to overcome some of the barriers to increasing State flexibility.

PRINCIPAL FINDINGS

Grant Demonstrated Administrative Efficiencies

North Dakota's block grant successfully accomplished its purpose of demonstrating administrative efficiencies. North Dakota and the Region agreed to take a conservative approach with the block grant and focus on achieving administrative savings and a more streamlined grant process. North Dakota's conservative approach slowly increased State and Region 8 staff confidence in the block grant and the PPG concept. North Dakota experienced administrative savings under the block grant and a more streamlined grant process. EPA's December 1995 PPG interim guidance appropriately included administrative flexibility and savings as one option that States could implement using a PPG.

Grant Disclosed Barriers To Increasing Resource Flexibility and Improving Environmental Results

The North Dakota block grant disclosed several barriers to increasing resource flexibility and improving environmental results. Regional internal turf battles and statutory restrictions limited North Dakota's ability to shift resources to its highest priority environmental problems. North Dakota and Region 8 did not agree on environmental priorities and Regional program staff did not want to relinquish their program funds for other programs. Also, Regional program staff disapproved some elements of North Dakota's strategy to shift funds due to statutory restrictions. In addition, lack of EPA guidance and incentives caused North Dakota staff to continue using traditional activity-based performance measures that resulted in traditional resource allocations and environmental results. EPA's PPG interim guidance included guidelines that would help address some of the barriers that limited North Dakota's resource flexibility.

RECOMMENDATIONS

The North Dakota block grant demonstrated lessons that would help build a strong PPG program. The Acting Regional Administrator needs to educate States interested in PPGs on the benefits of taking a conservative approach to obtain staff buy-in and on the options available for implementing PPGs. The Acting Regional Administrator needs to require Regional and

State staff to jointly develop and agree on State environmental priorities, encourage States to shift resources towards those priorities, and assist States in identifying statutory restrictions and appropriate alternatives to address States' highest priorities. In addition, the Acting Regional Administrator needs to educate States on the benefits of developing outcome-based performance measures and assist States in developing these measures.

**AUDITEE COMMENTS
AND OIG EVALUATION**

Region 8 and North Dakota agreed with our findings and recommendations. Both the Region and the State offered comments to clarify some issues and the Region offered comments to modify some recommendations. We modified the report as appropriate. The Region stated that the report was thorough and clear and reflected the commitments required for successful PPG implementation.

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Chapter 1

INTRODUCTION

PURPOSE

The Environmental Protection Agency (EPA) has spent considerable effort exploring options that would provide States more flexibility in targeting their resources to better meet complex environmental problems. Region 8 awarded the North Dakota Department of Health (North Dakota) a 3-year demonstration block grant (block grant) in 1995 as part of an initiative to increase State flexibility, improve intergovernmental partnerships, and streamline processes. In 1996, EPA sought authority to award performance partnership grants (PPG), similar to block grants, that would provide States and Indian Tribes the opportunity to combine funds, reduce administrative burdens and costs, strengthen EPA partnerships with States and Indian Tribes, and focus on environmental results. EPA obtained authority to award PPGs on April 25, 1996. North Dakota's block grant experience provided an opportunity to learn how States could effectively implement PPGs.

The purpose of our audit was to identify lessons learned from the North Dakota block grant that would assist EPA in building a strong PPG program. Our specific objectives were to determine whether:

- the block grant accomplished its intended purpose;
- grant performance measures were based on measurable, time-specific outcomes; and
- the Region had established oversight procedures for the block grant and for PPGs that allowed States a relatively high degree of autonomy to manage their environmental programs while providing adequate assurance that Federal funds were used efficiently and effectively.

BACKGROUND

In response to the recommendations from the National Performance Review and the State Capacity Task Force, EPA started a Grants Flexibility Initiative in 1994 to develop demonstration grants to provide States flexibility in how they managed and implemented EPA programs. The Initiative's intent was to facilitate more coordinated and integrated pollution control and prevention activities at the State level and improve State environmental protection program performance. Under the Grant Flexibility Initiative, the demonstration grants were to test whether and how increased flexibility in States' program implementation could improve environmental performance.

Region 8 awarded North Dakota an EPA demonstration block grant on January 24, 1995. North Dakota's fiscal 1995 block grant combined funding for nine environmental programs into one overall grant and totalled over \$2 million (Federal share). The grant combined funding for air, radon, hazardous waste, water pollution control, groundwater, pollution prevention, underground storage tanks, underground injection control, and toxic substances compliance monitoring. In fiscal 1996, the North Dakota block grant totalled about \$1.6 million (Federal share) as of February 21, 1996, and combined 10 environmental programs--the same 9 programs included in the 1995 grant plus the drinking water program. North Dakota continued to develop workplans for the block grant on a program-specific basis and Region 8 program project officers were responsible for reviewing and ensuring that North Dakota developed an acceptable workplan.

Under the North Dakota block grant, EPA reprogrammed State program grant funds--shifted money between programs funded in the Abatement Control and Compliance appropriations account. North Dakota remained responsible for existing statutory, regulatory, and court-ordered requirements. The grant was expected to run 2-3 years and reprogrammings were needed for each year.

EPA conducted the demonstration grants under existing authority. However, this authority was somewhat limited and could not be expanded to cover the full range of State environmental protection needs. For example, EPA had to obtain Congressional approval to reprogram the specific

program funds into the block grants. In an attempt to further empower States and Indian Tribes to protect human health and the environment, EPA began to seek authority to award PPGs in fiscal 1996 to States and Federally recognized Indian Tribes. EPA continued with its demonstration grants in fiscal 1996 as it was continuing to develop a PPG program. The PPG concept supported EPA's common sense approach to working with its intergovernmental partners and focused more on what States and Indian Tribes accomplished and less on how they accomplished it.

A PPG would be a single grant made to a State or Indian Tribe from grant funds allocated and otherwise available for existing categorical grant programs. PPGs would be voluntary and provide States and Indian Tribes with the option to combine funds from two or more categorical grants into one or more PPGs. PPGs were expected to promote partnerships, increase flexibility with appropriate accountability, and improve environmental outcomes through common sense approaches. States and Indian Tribes could apply for these grants for any period after enactment of statutory authority for the PPG program. EPA obtained authorizing legislation to award PPGs for fiscal 1996 on April 25, 1996.

The PPG concept was one of several EPA initiatives developed during fiscal 1995 to further the Grants Flexibility Initiative and promote a better partnership between EPA and States. On May 17, 1995, State and EPA leaders signed a *Joint Commitment to Reform Oversight and Create a National Environmental Performance Partnership System* (NEPPS). The agreement's objective was to accelerate the transition to a new working relationship between EPA and States--one which reflected the advancement made in environmental protection over the preceding two decades by EPA and States. NEPPS and PPGs shared many of the same key goals.

Both NEPPS and PPGs were part of the new "Performance Partnerships" that were to be implemented throughout the Federal Government beginning in fiscal 1996 to better work with States in achieving shared goals. Performance partnerships were an opportunity for the Federal Government and States to exchange funding restrictions for a new, incentive-based focus on performance and outcomes. These

partnerships would consolidate funding sources and eliminate overlapping authorities, create incentives to reward desirable results, and reduce micro-management and wasteful paperwork. The partnership concept sought to empower communities to make their own decisions about how to address their needs, and to be held accountable for results.

SCOPE AND METHODOLOGY

We conducted our fieldwork from November 1995 to April 1996. We evaluated the North Dakota block grant to determine what lessons could be learned from the grant that could be applied to PPGs. We conducted our work in Region 8's Denver, Colorado program offices and the North Dakota Department of Health in Bismarck, North Dakota.

To determine whether the block grant accomplished its intended purpose, we reviewed fiscal 1995 and 1996 grant agreement documents and fiscal 1995 grant evaluation results, and interviewed Region 8 and North Dakota program staff. We evaluated fiscal 1994-1997 program workplans to determine whether grant performance measures were based on measurable, time-specific outcomes. We reviewed fiscal 1995 mid-year and end-of-year program reports and discussed workplan activities with Regional and North Dakota program staff to determine whether North Dakota accomplished its workplan goals.

To determine whether the Region established oversight procedures for the block grant and PPGs, we reviewed the Regional guidance used to develop the block grant and EPA's December 1995 PPG interim guidance. We reviewed the PPG interim guidance to determine whether it appropriately defined States' and Regions' roles and responsibilities under the PPG program. We interviewed North Dakota and Region 8 staff on the Region's oversight activities and discussed barriers or limitations that prevented North Dakota from increasing block grant benefits. Our purpose was to determine whether the Region's oversight provided States a relatively high degree of autonomy to manage their environmental programs while providing adequate assurance that Federal funds were used efficiently and effectively.

Throughout our review of Region 8's grant and project officer files and discussions with Regional and North Dakota program staff, we assessed whether lessons could be learned from the North Dakota-block grant. Specifically, we reviewed the Region's 1995 mid-year grant evaluations and interviewed program staff to determine whether program staff encountered problems with the block grant. We compared problems experienced during the block grant period with the proposed PPG concept to determine if these same problems might exist under the PPG program. We evaluated EPA's December 1995 PPG interim guidance to determine whether it adequately addressed problems and barriers encountered with the block grant. We also worked with Regional and North Dakota staff to identify how to overcome these barriers and develop an effective PPG program.

Our review was more limited in scope than an audit, and as such, did not necessarily encompass all generally accepted government auditing standards. Alternatively, we performed our review in accordance with provisions of the Office of Inspector General (OIG) Manual Chapter 150, *Reports of Review*. Other than the issues discussed below, no other significant issues came to our attention that warranted expanding our audit scope.

PRIOR AUDIT COVERAGE

Neither OIG nor the General Accounting Office (GAO) has issued a prior audit report specifically addressing the North Dakota block grant. However, GAO has issued many reports on block grants. For example, a September 1995 GAO report entitled, *BLOCK GRANTS: Issues in Designing Accountability Provisions*, summarized nearly 2 decades of reports, evaluations, testimony, and other GAO correspondence on accountability issues related to intergovernmental programs. The report stated that building accountability into block grants was an important, but difficult, task requiring trade-offs between Federal and State control over program finances, activities, and administration. Also, the report stated that the presence of too many requirements and conditions could inhibit States from realizing the kinds of efficiencies promised by the block grant mechanism. Overly prescriptive Federal requirements could limit States' abilities to integrate related

Federal and State programs in new and more efficient ways. A February 1995 GAO report entitled, *BLOCK GRANTS: Characteristics, Experience, and Lessons Learned*, reported that a principal lesson learned from the Federal Government's experience with earlier block grants was the need to focus on accountability. In addition, the report stated that State flexibility was reduced as funding constraints were added to block grants over time.

Chapter 2

GRANT DEMONSTRATED ADMINISTRATIVE EFFICIENCIES

North Dakota's block grant successfully accomplished its purpose of demonstrating administrative efficiencies. North Dakota's and EPA's initial expectations for the block grant were very high and included making significant changes and substantially increasing resource flexibility. However, EPA Headquarters and Regional staff had concerns regarding how much flexibility to provide North Dakota and how to ensure State accountability. As a result, North Dakota and the Region agreed to take a more conservative approach with the block grant and focus on achieving administrative savings and a more streamlined grant process. North Dakota's conservative approach slowly increased State and Region 8 staff confidence in the block grant and the PPG concept. North Dakota experienced administrative savings under the block grant and a more streamlined grant process. EPA's December 1995 PPG interim guidance appropriately included a PPG option focusing on streamlining and administrative efficiencies.

INITIAL EXPECTATIONS CHANGED TO FOCUS ON ADMINISTRATIVE EFFICIENCIES

EPA Headquarters and Region 8 had high expectations at the initial stages of the block grant. At a broad level, the North Dakota block grant was intended to enhance the effectiveness of EPA's working relations with State, local, and Tribal governments and improve the performance of environmental protection programs by increasing flexibility in how they were implemented. The Region expected the block grant to provide an opportunity to focus on program performance and environmental results and away from prescribing State activities and levels of effort. The Region had planned to develop environmental indicators and outcome-based performance measures for the block grant. However, North Dakota and Region 8 staff stated that concerns regarding the

block grant caused the State and the Region to focus on administrative efficiencies.

The block grant's original purpose was to demonstrate whether and how flexibility of block grants could help a State manage and implement more effective environmental protection programs. Specifically, the Region wanted the North Dakota block grant to demonstrate the efficacy of providing block grant funds for the purposes of gaining administrative efficiencies, improving environmental results and partnerships, and facilitating multi-media geographic, ecosystem, and pollution prevention approaches to environmental protection.

Regional and North Dakota staff were reluctant and apprehensive about the block grant, its effect on program activities, and the shifting of funds from one program to another. In an attempt to minimize staff concerns, North Dakota and Region 8 agreed that the block grant would move slowly and be more predictable. Further, North Dakota wanted to take a conservative approach to allow Regional and North Dakota staff the opportunity to become comfortable with changes in the grant process and buy-in to the block grant concept. As a result, North Dakota and the Region focused on streamlining the grant process and gaining administrative efficiencies. A North Dakota official stated that North Dakota was also working towards improving partnerships, and facilitating multi-media geographic, ecosystem, and pollution prevention approaches to environmental protection.

North Dakota's conservative approach to implementing the block grant increased State staff's confidence in the block grant and PPG concept. North Dakota staff stated that implementing the block grant slowly had given them the opportunity to build trust with Regional staff and alleviated their initial concerns. North Dakota staff stated that they felt comfortable with the block grant and would likely enter into a PPG. North Dakota staff also stated that taking the block grant slowly appeared to have increased Region 8 staff confidence with the block grant and North Dakota's ability to effectively implement a PPG.

**GRANT
ACCOMPLISHED
ADMINISTRATIVE
SAVINGS AND
STREAMLINED
THE GRANT PROCESS**

North Dakota experienced administrative savings under the block grant and a more streamlined grant process. The block grant assisted North Dakota and Regional staff in simplifying and streamlining the administrative paperwork involved in the grant process. Further, Regional and North Dakota staff demonstrated the importance of coordination when changing and streamlining the grant process. Although North Dakota staff could not quantify the cost savings, they believed that their expectations for the block grant had been met by the significant reduction in administrative paperwork and staff time spent on administrative activities.

North Dakota's block grant provided administrative savings by combining nine programs under one grant and reducing the amount of required paperwork. North Dakota staff prepared only one grant application rather than nine separate grant applications, and one financial status report rather than nine separate reports. North Dakota staff drew grant funds from one grant and kept track of one matching account rather than nine separate accounts. North Dakota staff charged one payroll account rather than splitting it among nine various grants. In addition, the staff charged common equipment expenses against one grant rather than dividing it among the various grants. The block grant also reduced Region 8's administrative activities. For example, Regional staff were required to review, process, and track only one grant award rather than nine separate awards.

Changing the grant process and effectively streamlining the new process to gain administrative cost savings required significant Regional and State coordination. Regional and North Dakota staff effectively coordinated block grant activities by establishing a central point of contact. Region 8 established a central project officer to be the primary point of contact for the North Dakota block grant. The central project officer coordinated programmatic and technical aspects of the block grant among various Region 8 and Headquarters staff. Additionally, North Dakota established a central State project officer who coordinated activities among State project managers and Regional staff. Both Regional and North Dakota staff stressed the importance of designating these individuals to coordinate the block grant's financial and programmatic activities.

Although North Dakota did not document cost savings associated with the block grant, it estimated an 80-90 percent savings in budget and grant application preparation and grant award accounting and tracking. In its fiscal 1995 end-of-year evaluation of the block grant, North Dakota reported it did not have actual documented cost savings available since it had never documented the costs associated with previous years' grant applications and workplans. As a result, North Dakota did not have prior year costs to compare savings experienced with the block grant. According to North Dakota staff, approximately the same amount of time was spent on workplan development as in past years. However, North Dakota staff expected that future workplan development would require less time since the State developed a two-year workplan for fiscal 1996 and 1997.

North Dakota's State Legislature contributed to North Dakota's success in realizing administrative savings. The North Dakota State Legislature did not require North Dakota to continue reporting Federal grant expenses and resources as it would under the nine separate program grants. The Legislature allowed North Dakota staff to report the same information to its legislature regarding the block grant as was reported to EPA.

**PPG GUIDANCE
INCORPORATED
LESSONS
LEARNED FROM THE
BLOCK GRANT**

The December 1995 PPG interim guidance incorporated many of the lessons learned from the North Dakota block grant. The interim guidance provided four implementation options for States with PPGs. One PPG option focused only on streamlining the grant process and achieving administrative efficiencies. In addition, the PPG interim guidance effectively defined EPA and State roles in the PPG program and the importance of coordination.

EPA's PPG interim guidance provided four options or levels for States to choose when implementing PPGs. One option, or Level 1, included implementing the grant similar to the way North Dakota implemented its block grant; i.e., focusing on streamlining the grant process and achieving administrative efficiencies. The second option, or Level II, provided for administrative and program flexibility. Level

III provided for administrative and program flexibility based on a Performance Partnership Agreement that replaced categorical workplans. Level IV provided for a PPG application under any of the three previous options and piloting NEPPS. Providing States with this type of flexibility--to determine the type of administrative and programmatic changes that were most appropriate--allowed States and Regional staff to develop confidence in the PPG process. Additionally, providing a variety of options allowed States that were not ready to implement the other options to take advantage of the administrative streamlining available through PPGs.

The North Dakota block grant demonstrated that States may not yet be convinced that the other PPG options provide any benefit at this time. For example, North Dakota staff explained that their current block grant could qualify as a Level I PPG or with a little more work a Level II PPG. However, they were uncertain what benefits a Level III or IV PPG would provide. State staff believed that the Level III or IV options would require a great deal more work for the same amount of grant funds and no guarantee of reduced oversight.

The PPG interim guidance effectively defined EPA and State roles in the PPG program and stressed the importance of coordination. The PPG interim guidance required Regional Administrators to designate a single point of contact to serve as the regional PPG project officer. As the North Dakota block grant demonstrated, the central project officer would be the primary point of contact for a State and would be responsible for coordinating all programmatic and technical aspects of the PPG. The PPG interim guidance also encouraged States to designate a single point of contact for PPGs to serve as the counterpart to the Region's central project officer.

CONCLUSION

The North Dakota block grant successfully achieved administrative efficiencies and a more streamlined grant process. North Dakota's conservative approach to implementing the block grant demonstrated the importance

of implementing PPGs slowly and establishing State and Regional confidence and buy-in to the process. Without State and Regional staff support and buy-in to the PPG program, States might not see any benefit to implementing this new grant program. The block grant assisted North Dakota and Regional staff in simplifying and streamlining the administrative paperwork involved in the grant process. Regional and North Dakota staff effectively coordinated block grant activities by establishing a central point of contact. In addition, North Dakota's State Legislature contributed to the State's success in achieving administrative savings because the Legislature allowed North Dakota staff to streamline the State's reporting requirements.

EPA's PPG interim guidance included activities that North Dakota successfully demonstrated with its block grant. The interim guidance offered several options for States to implement including North Dakota's successful approach to focus on streamlining the grant process and achieving administrative efficiencies. The interim guidance also emphasized the importance of designating Regional and State coordinators for the PPGs.

RECOMMENDATIONS

We recommend the Acting Regional Administrator:

1. Educate other States interested in PPGs on the benefits of taking a conservative approach to PPGs in order to obtain staff buy-in to the PPG program.
2. Assist States interested in PPGs in identifying whether their State legislature may inhibit opportunities to streamline their grant process.
3. Distribute the PPG interim guidance to all States and ensure that States interested in PPGs fully understand the available options for implementing PPGs.
4. Emphasize to Regional and State staff the importance of designating coordinators described in the PPG interim guidance.

**AUDITEE COMMENTS
AND OIG
EVALUATION**

Region 8 and North Dakota agreed with our findings and recommendations. Both the Region and the State offered comments to clarify some issues and the Region offered comments to modify the recommendations. We modified the report as appropriate.

Chapter 3

GRANT DISCLOSED BARRIERS TO INCREASING RESOURCE FLEXIBILITY AND IMPROVING ENVIRONMENTAL RESULTS

The North Dakota block grant disclosed several barriers to increasing resource flexibility and improving environmental results. The block grant's main purposes included giving North Dakota the resource flexibility to tailor resources and programs to specific needs, increasing the use of program performance measures that focused on outcomes, and improving environmental results. However, Regional internal turf battles and statutory restrictions limited North Dakota's ability to shift resources to its highest priority environmental problems. North Dakota and Region 8 did not agree on environmental priorities and Regional program staff did not want to relinquish their program funds for other programs. Also, Regional program staff disapproved some elements of North Dakota's strategy to shift funds due to statutory restrictions. In addition, lack of EPA guidance and incentives caused North Dakota staff to continue using traditional activity-based performance measures that resulted in traditional resource allocations and environmental results. EPA's PPG interim guidance included guidelines that would help address some of the barriers that limited North Dakota's resource flexibility.

TURF BATTLES RESTRICTED RESOURCE FLEXIBILITY

North Dakota and Region 8 did not agree on environmental priorities and allocation of resources to address those priorities. Individual Regional program staff viewed their programs as high priority and did not agree that resources should be shifted from their program to another program. Although Regional staff recognized the importance of providing North Dakota resource flexibility, when North Dakota proposed to shift funds among programs, program managers resisted and stated that their program priorities could not afford disinvestments. North Dakota's proposal for

disinvesting in some programs and media areas caused apprehension and concern among Regional program managers regarding losing their program funds.

North Dakota developed an investment and disinvestment strategy for its block grant based on North Dakota's assessment of its highest priorities. The strategy proposed shifting resources among programs to better address North Dakota's environmental priorities. North Dakota's investment and disinvestment strategy proposed shifting funds from its air and hazardous waste programs to its water programs. North Dakota identified groundwater and drinking water as its highest priority and proposed disinvesting in the indoor radon and hazardous waste management programs.

Regional staff did not agree with North Dakota's environmental priorities and strategy for shifting funds. The Region discouraged three of the four proposed disinvestments. For example, North Dakota proposed decreasing survey and monitoring work in its indoor radon program, enabling the transfer of approximately \$50,000 in funds to another program. The Region did not agree that a disinvestment in the indoor radon program was reasonable since the program was "one of the higher risk categories." The Region cited recent discussions between Regional and North Dakota program staff where they had tentatively agreed to increase activities in the radon program and incorporate these activities as increased investments in the State-EPA Agreement (SEA). The Region also disagreed with North Dakota's proposal to put all of its pollution prevention funds (approximately \$50,000) into groundwater and non-point source pollution programs. The Region stated that although this proposal may promote pollution prevention for groundwater and non-point sources, the proposal did not deal "holistically" with preventing pollution from hazardous waste, water point sources, or air sources.

North Dakota staff stated that they had difficulty reconciling State and EPA priorities. Many EPA Headquarters initiatives did not always correspond with a State's priorities and sometimes individual Regional personnel seemed to distrust the State's ability to set appropriate priorities,

according to a State staff person. He added that the Region and North Dakota should jointly establish and agree on priorities. North Dakota would be better able to focus on its priorities once it had the flexibility to shift funds.

Many EPA staff, including National and Regional program managers and project officers, expressed concern regarding shifting resources among programs. Regional staff were unsure of what to expect from shifting resources and the impact it would have on individual programs. A Region 8 program manager stated that Regional staff had difficulty accepting the concept of moving funds from one program to another. He stated that Regional staff may have intimidated North Dakota into not shifting resources and could possibly intimidate other States with PPGs.

A North Dakota staff person stated that the resistance from Regional staff and turf battles over funds early in the planning process had the potential of holding up the initial block grant award. North Dakota did not want disputes over its investment and disinvestment strategy to delay awarding the block grant. As a result, North Dakota did not dispute the Region's response to its proposal and did not shift funds. North Dakota representatives explained that their two main priorities were maintaining the State's program delegations--receiving sufficient funding to accomplish the required activities to maintain delegation--and having staff become comfortable with the new block grant concept. In addition, North Dakota did not want to jeopardize its good working relationship with the Region.

After the first year of the block grant, North Dakota believed that Regional and North Dakota staff were more comfortable with the block grant concept. A Senior Regional manager stated that the Region's reorganization (effective October 1995) may also help program staff overcome their turf battles and eliminate their reluctance to give up funds for another program. The Region's new organization was focused to promote multi-media problem solving and cross-program integration. However, the new organization still had some media units and Regional staff may still want to maintain maximum funds for their own program priorities rather than give up their funds for other programs. North Dakota staff

have not proposed a new investment and disinvestment strategy to shift funds in the second and third year of the block grant. North Dakota staff cited that by maintaining the same program resource allocations they minimized Regional staff resistance and expedited the whole grant process.

**STATUTORY
RESTRICTIONS
LIMITED
RESOURCE
FLEXIBILITY**

Region 8 staff appropriately disapproved some elements of North Dakota's investment and disinvestment strategy due to statutory restrictions. However, Regional staff did not assist North Dakota in identifying appropriate options to overcome these statutory restrictions. Several statutes restricted North Dakota from shifting funds from one program to another program. For example, the Region found that North Dakota's proposal to direct hazardous waste funds to its solid waste program was prohibited by statute. The use of statute-authorized Subtitle C funds for Subtitle D solid waste activities was specifically prohibited by statute. North Dakota had also proposed to reduce the frequency of water quality standards reviews from once every 3 years to once every 5 years. The Region cited that the Clean Water Act required that standards be reviewed every 3 years. Thus, North Dakota had to continue reviewing the standards every 3 years.

The North Dakota Department of Health's Chief of Environmental Health Section (Chief) stated that Region 8 should have helped his staff identify other appropriate options to overcome some of the statutory restrictions. For example, although the statutes prohibited North Dakota from using hazardous waste funds for solid waste, the Region did not offer any information on whether other media funds (e.g., air or water) could possibly be used for the solid waste program. He explained that this type of information would have helped provide North Dakota the flexibility to work on its highest environmental priorities. A State staff person added that the Region's assistance in identifying statutory restrictions and appropriate alternatives to overcome them should be made prior to the State developing an investment and disinvestment strategy that may not be feasible.

**LACK OF EPA
GUIDANCE AND
INCENTIVES
RESULTED IN
MINIMAL
CHANGES**

North Dakota and Region 8 staff used the traditional SEA process to define and measure environmental performance. North Dakota's performance results did not differ significantly from prior years' results. One of the block grant's purposes was to increase North Dakota's use of program performance measures that focused on outcomes to achieve improved environmental results. However, lack of EPA guidance and incentives influenced North Dakota staff to continue using activity-based performance measures, according to North Dakota staff. North Dakota allocated its resources the same as in prior years in order to meet its traditional activity-based performance measures. North Dakota met its workplan commitments and its performance did not change significantly from prior years.

**Traditional Activity-
Based Performance
Measures Were Used to
Evaluate
Performance**

North Dakota and Region 8 used the traditional SEA process, related workplans, and program evaluations to define and measure environmental program performance. North Dakota continued to use traditional activity-based measures for the block grant. North Dakota staff stated that they had difficulty developing environmental indicators and outcome-based performance measures because EPA had provided limited guidance and North Dakota staff did not see any benefit to new measures. Although North Dakota took steps to facilitate multi-media approaches to environmental protection, it did not attempt to develop new performance measures beyond the traditional activity-based measures.

Region 8 initially planned on trying to develop outcome-based performance measures for the block grant. In the Region's guidance for the North Dakota block grant, the Region emphasized that EPA and North Dakota project officers were to be pushed to develop outcome measures in workplans and deemphasize input measures. However, Region 8 project officers did not require North Dakota staff to change performance measures and North Dakota staff did not initiate any changes.

The Region and North Dakota used the SEA process to negotiate program activities and goals as they had in the past with categorical grants. The SEA defined the scope of environmental program responsibilities and commitments. The agreement coordinated and integrated the planning,

management, prioritization, implementation, evaluation, and funding of programs and program activities under various Federal program laws. The SEA included program-specific workplans that defined North Dakota's activities and milestones for each of its environmental programs including those in the block grant. The program activities were the same as they had been in prior years for individual categorical grants.

Regional oversight of North Dakota's environmental programs did not change under the block grant. Region 8 staff used traditional mid-year and end-of-year reviews to evaluate North Dakota's progress in meeting its workplan goals. The Region had reduced its level of oversight of North Dakota programs several years ago due to North Dakota's continued good performance in meeting program requirements.

North Dakota did not attempt to develop environmental indicators or outcome-based performance measures. A North Dakota program director stated that North Dakota chose to continue with its "bean-counting" measures because the staff would have had a difficult time developing new environmental indicators. The Chief stated that North Dakota staff (and other States) would have difficulty developing environmental indicators and outcome-based performance measures because EPA had no guidance on developing measures. A North Dakota program director explained that he had no problem with identifying the number of inspections and permits needed for his programs (traditional activity-based measures). He believed that these types of measures were easier to develop and provided more flexibility than would new environmental indicators.

North Dakota staff stated they would have difficulty developing and implementing environmental indicators because they were not easily measurable or definable and required a lot more work to develop without any additional funding. It appeared that any kind of environmental indicator would be generic and something that would be based on several years of work (e.g., reducing air pollution by 10 percent by a certain future date), according to a State program director. The Chief stated that North Dakota would

be required to do the same activities it always had for each program and that it appeared these activities would still provide a basis for whether environmental problems were being managed. Another North Dakota staff person added that these types of new initiatives required a lot more work, did not really change what North Dakota was required to do, and North Dakota did not receive any additional funds to implement new initiatives.

North Dakota was moving forward with trying to implement multi-media activities under the block grant, according to the Chief. He explained that they had started working on how activities could take a multi-media approach and cited as an example the work they had recently done on a watershed approach. He stated that implementing this approach was possible because the block grant allowed State staff from various programs to work together on a project without categorized grant limitations. To further its attempts to evaluate where multi-media activities could be developed, North Dakota prepared a 2-year SEA for fiscal 1996 and 1997. The SEA included multi-media priorities which, according to a North Dakota staff person, were more in line with EPA's policy to move away from specific media-based measures. For example, the SEA stated that one of North Dakota's priorities that were incorporated into the workplans was to develop a comprehensive water management plan for the Red River Basin. However, the majority of the workplan activities were still media-specific with activity-based measures.

**Resource Allocation and
Workplan
Accomplishment
Remained the
Same Under the Grant**

North Dakota allocated resources similar to prior years and North Dakota's performance results were generally the same as they had been under categorical grants. North Dakota staff stated that the limited grant resources were only sufficient to implement the traditional SEA activities and did not provide excess funds to shift to other environmental problems. Region 8 staff found that North Dakota staff appropriately met the SEA program workplan commitments and that generally accomplishments were the same as in previous years.

North Dakota staff believed that they had few, if any, excess funds to address other priority environmental problems

beyond the SEA activities given the limited amount of grant funds they received. North Dakota did not want to jeopardize losing its program delegations by shifting funds to other environmental activities and leaving insufficient funds to implement all of the SEA activities. A Regional project officer stated that small States such as North Dakota did not receive a lot of Federal funding and probably had very little, if any, excess funding that the State did not need to meet program delegation requirements. North Dakota's continued use of the traditional activity-based performance measures limited staff's performance to these specific activities and to traditional allocation of resources.

The central Region 8 project officer received grant performance evaluation feedback at the mid-year point that workplan accomplishments were the "same" or "better" than previous years, in terms of number of outputs, quality of outputs, and timeliness of outputs. Regional project officers reported that program performance did not change significantly under the block grant. Regional program project officers indicated that their experience with the block grant was "business as usual" with little, if any, negative impact. They reported that the State's overall progress in fulfilling workplan commitments was acceptable. Also, Region 8's end-of-year reviews reported that North Dakota met its workplan commitments.

The Region's July 12, 1996, written evaluation of North Dakota's fiscal 1995 block grant included much of the same information as provided in this report. In addition, the evaluation stated that while North Dakota attributed multimedia and pollution prevention activities to the block grant, the Regional project officers did not attribute any increased level of program activities directly to the block grant.

**NEW GUIDANCE MAY
ELIMINATE
BARRIERS IF
IMPLEMENTED**

EPA's PPG interim guidance included guidelines that would help address some of the barriers that limited North Dakota's resource flexibility. The PPG interim guidance encouraged Regions and States to jointly develop and agree on priorities and provided a process to address disagreements on those priorities. In addition, the interim guidance emphasized that flexibility was one of the PPG program's main purposes.

However, in order to prevent States from being intimidated and acquiescing to the Region on environmental priorities and fund shifting, Regional staff needed to take a proactive approach to educate States on the PPG interim guidance and the options available to increase resource and programmatic flexibility.

The PPG interim guidance encouraged States and senior Regional staff to negotiate a list of each State's most significant environmental problems and related PPG goals. The North Dakota block grant demonstrated the importance of EPA and States negotiating environmental priorities and goals to ensure that both parties agreed on a State's most significant environmental problems. Jointly developing priorities could alleviate some of the turf battles among program staff and assist a State in developing its investment and disinvestment strategy. Further, senior Regional management needed to demonstrate its buy-in and acceptance of PPG funding flexibility and provide States with the maximum amount of flexibility possible. North Dakota recognized in its investment and disinvestment strategy that EPA's upper management needed to be involved in establishing ground rules for determining program funding shifts.

The PPG interim guidance briefly discussed that disagreements between a State and EPA regarding PPG program commitments, priorities, and/or related performance indicators were to be resolved at the lowest level possible; i.e., the project officer. After the project officer, a Dispute Decision Official designated by the Regional Administrator was the next level of appeal. North Dakota did not appeal any of the Region's decisions on its initial investment and disinvestment strategy.

Although the PPG interim guidance clearly stated that one of the purposes of the PPGs was to provide States with the flexibility to shift resources to their highest environmental priorities, it did not emphasize that Regional staff should take a proactive approach to encourage States to establish priorities and shift funds as appropriate. North Dakota did not contest the Region's response to its investment and disinvestment strategy. North Dakota determined that it was

more important to obtain the funds for program implementation than it was to try to dispute the Region's view on the State's priorities. As a result, North Dakota did not shift funds under the block grant and did not demonstrate whether shifting funds could improve environmental results.

CONCLUSION

Barriers prevented North Dakota from realizing resource flexibility and improving environmental results. Region 8 needs to actively work with States to identify options to overcome these barriers and to ensure that North Dakota and other States with PPGs are fully benefitting from increased resource flexibility. Regional and North Dakota staff did not jointly develop and agree on environmental priorities, evaluate where resources could be shifted to meet these priorities, and assist each other in identifying opportunities to move resources. Region 8 staff did not assist North Dakota in finding appropriate ways to overcome statutory or regulatory restrictions. The Region identified statutory restrictions to shifting funds but did not provide suggestions on other appropriate options to address environmental priorities. Further, Regional staff did not encourage or assist North Dakota staff in developing outcome-based performance measures. North Dakota staff continued using traditional activity-based performance measures that staff stated required them to use traditional resource allocations. Although North Dakota successfully accomplished its workplan commitments, it did not obtain any significant improvements in its environmental results in comparison to prior years.

The PPG interim guidance provided an effective resource for States interested in PPGs to build a strong PPG program that provided flexibility and accountability. The interim guidance emphasized the importance of jointly developing priorities, developing a dispute process, and providing States with the flexibility to shift resources to their highest environmental priorities. However, unless North Dakota and other States interested in PPGs are educated on the PPG interim guidance, provided incentives to implement the available options under PPGs, and encouraged to shift funds to address their environmental priorities, States might be

intimidated and acquiesce to EPA on environmental priorities and fund shifting.

RECOMMENDATIONS

We recommend the Acting Regional Administrator:

1. Require Region 8 and States' staff to jointly develop and agree on State environmental priorities and encourage States to shift resources, if needed, towards their highest priorities.
2. Require Region 8 and States' staff to document priorities and funding decisions in the SEA workplans or Performance Partnership Agreements.
3. Assist States in identifying statutory provisions that restrict resource flexibility prior to States submitting proposals to shift resources and provide States with other appropriate alternatives to address their highest priorities.
4. Educate and inform States about changes in statutory requirements and restrictions.
5. Obtain Regional staff buy-in early in the PPG program to ensure States have maximum flexibility to shift funds to address their highest priority environmental problems.
6. Educate States on the benefits and importance of developing environmental indicators and outcome-based performance measures.
7. Assist States in revising current performance measures by developing some standardized measures or guidance for developing environmental indicators.
8. Negotiate environmental indicators and outcome-based performance measures with each State.
9. Encourage States to assess the efficiency of their current program operations, and assist States in

streamlining and improving their operations to free up additional resources that could be shifted to address priority problems.

10. Educate Regional and State staff on, and encourage the use of, the dispute process available for disagreements between Regional and State staff regarding program commitments, priorities, and related performance measures.
11. Emphasize to Regional staff that they should take a proactive approach to helping States establish priorities and shift funds as appropriate.

**AUDITEE COMMENTS
AND OIG
EVALUATION**

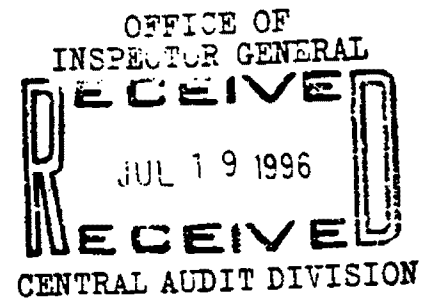
Region 8 and North Dakota agreed with our findings and recommendations. Both the Region and the State offered comments to clarify some issues and the Region offered comments to modify the recommendations. We modified the report as appropriate.



APPENDIX 1
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

JUL 15 1996



Ref: 8P2-SA

MEMORANDUM

SUBJECT: North Dakota Demonstration Block Grant
Changes to Draft Report No. E1FMF6-08-0019

FROM: Jack W. McGraw
Acting Regional Administrator
Region VIII

TO: Bennie S. Salem
Acting Divisional Inspector General
for Audit

Thank you for the opportunity to review the June 6, 1996 draft report: "North Dakota Block Grant Decreased Administrative Costs and Disclosed Potential Barriers." In response to your request for comments, several members of my staff met with Jeff Hart and Kim Victor earlier this week to discuss the report.

One of the primary discussion points was the list of recommendations on page 21 of the report. After our discussions, we agreed that the recommendations would read as follows:

1. Require Region VIII staff and States to jointly develop and agree on State environmental priorities and encourage States to shift resources, if needed, towards their highest priorities.
2. Require Region VIII staff and States to document the jointly developed priorities and fund shifting decisions in the SEA workplans or Performance Partnership Agreements.
3. Assist States in identifying statutory provisions that restrict resource flexibility prior to States submitting proposals to shift resources and provide States with other alternatives to addressing States' priorities.
4. Educate and inform States about changes in statutory requirements and restrictions.
5. Obtain Regional staff buy-in early in the PPG program to ensure States have maximum flexibility to shift funds to address their highest priority environmental problems.



6. Educate States on the benefits and importance of developing environmental indicators and outcome-based performance measures.
7. Assist States in revising current performance measures by developing some standardized measures or guidance for developing environmental indicators.
8. Negotiate environmental indicators and outcome-based performance measures with each State.
9. Encourage States to assess the efficiency of their current program operations, and assist States in streamlining and improving their operations to free up additional resources that could be shifted to address priority problems.
10. Educate Regional and State staff on, and encourage the use of, the dispute process available for disagreements between Regional and State staff regarding program commitments, priorities, and related performance measures.
11. Emphasize to Regional staff that they should take a proactive approach to helping States establish priorities and shift funds as appropriate.

We appreciate the thoroughness of the Inspector General's Draft Report. It reflects very well on the OIG's positive role in helping make the performance partnership agreement a success. The report reflects a clear understanding of Performance Partnership grants (PPGs), their purpose, and the State and EPA commitments required for successful implementation of PPGs. We look forward to a continued dialogue on these recommendations.

If you have any questions regarding the North Dakota Block Grant audit, please contact Jack Bowles at 303/312-6315 or Sara Summers at 303/312-6318.

cc: Fritz Schwindt (N.D.)
Shelly Metzenbaum
Kerry Clough
Jack Bowles
Jeff Hart
Sara Summers



NORTH DAKOTA
DEPARTMENT OF HEALTH

APPENDIX II
Page 1 of 1

ENVIRONMENTAL HEALTH SECTION

July 1, 1996

1200 Missouri Avenue
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Bismarck, North Dakota 58506-5520
Fax #701-328-5200

Mr. Bennie S. Salem
Acting Divisional Inspector General
Office of Inspector General, EPA
999 18th Street, Suite 500
Denver, CO 80202

Dear Mr. Salem:

Thank you for the opportunity to review the Draft North Dakota Demonstration Block Grant Report No. E1FMF6-08-0019-XXXXXXX. We compliment and thank Kim Victor and Stacy Schaefer on the professional review they conducted in Bismarck and on the report.

We concur with the Report's findings and recommendations as outlined in the Executive Summary and on pages 21-22. We have only a few comments as to the report, as follows:

1. Our Department should be referred to as the North Dakota Department of Health on page 1, page 1 in Chapter 1 and on page 24.
2. We suggest deleting the (following) last sentence in the first paragraph, page 7: "As a result, North Dakota and the Region decided to narrow the block grant's purpose to streamlining the grant process and gaining administrative efficiencies." We are still implementing activities in accordance with the FY 95 and FY 96 block grant awards' purposes: "improving partnerships, facilitating multi-media geographic, ecosystem and pollution prevention approaches to environmental protection."
3. We have a suggested rewrite for page 9, last paragraph, as follows: The North Dakota block grant demonstrated that States may not yet be convinced that the other PPG options provide any benefit at this time. For example, North Dakota staff explained that their current grant could qualify as a Level I PPG (administrative flexibility) or with a little more work a Level II PPG (administrative and program flexibility). However, they are uncertain what benefits a Level III or IV PPG would provide. They believe that the Level III or IV options will require a great deal more work for the same amount of grant funds and no guarantee in reduced oversight.

We appreciate your assistance and feel that your findings and recommendations will be very important in the EPA/State PPG work. Thank you!

Sincerely,

Francis J. Schwindt, Chief
Environmental Health Section

Environmental Health Section
and Enforcement
701-328-5150

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701-328-5188

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Facilities
701-328-5211

Waste
Management
701-328-5166

Water
Quality
701-328-5210

ABBREVIATIONS

Block Grant	North Dakota Demonstration Block Grant
Chief	North Dakota Department of Health's Chief of Environmental Health Section
EPA	Environmental Protection Agency
GAO	General Accounting Office
NEPPS	National Environmental Performance Partnership System
North Dakota	North Dakota Department of Health
OIG	Office of Inspector General
PPG	Performance Partnership Grant
SEA	State-EPA Agreement

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