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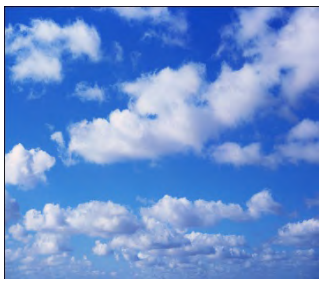


Formative Evaluation of the OSWER Community Engagement Initiative

Final Report

October 28, 2013

ACKNOWLEDGEMENTS

The *Formative Evaluation of the OSWER Community Engagement Initiative* was developed for the U.S. Environmental Protection Agency's Office of Policy under Contract EP-W-10-002 between EPA and Industrial Economics, Inc. (IEc) of Cambridge, MA. The evaluation team was comprised of the Office of Policy's Evaluation Support Division (ESD), the Office of Solid Waste and Emergency Response (OSWER), and IEc. Angela Helman, Peter Courtright, and Josh Wolff represented IEc. IEc proposed the evaluation methodology, collected and analyzed data, summarized findings, and developed this evaluation report under the oversight of ESD and with guidance from the entire evaluation project team.

Michelle Mandolia, the Work Assignment Manager, provided oversight on behalf of ESD. Ellen Manges and Jackie Harwood from OSWER provided overall guidance and direction. Special thanks go to the many interviewees from EPA, state environmental agencies, and community groups, who provided critical information that informed the evaluation.

This report was developed under the Program Evaluation Competition, sponsored by EPA's Office of Policy. To access copies of this or other EPA program evaluations, please go to ESD's Web site at http://www.epa.gov/evaluate

TABLE OF CONTENTS

APPENDICES:

ACRONYM LIST

CEI: Community Engagement Initiative

CAG: Community Advisory Group

CARE: Community Action for a Renewed Environment

CPRC: Conflict Prevention and Resolution Center

CIP: Community Involvement Plan

ESD: Evaluation Support Division

HQ: Headquarters

ID: Information Dissemination

IEc: Industrial Economics, Incorporated

NEPA: National Environmental Policy Act

NCP: National Contingency Plan

OEJ: Office of Environmental Justice

OSWER: Office of Solid Waste and Emergency Response

OW: Office of Water

PRP: Potentially Responsible Party

RCRA CA: Resource Conservation and Recovery Act Corrective Action

RP: Responsible Party

TA: Technical Assistance

TAB: Technical Assistance for Brownfields

TAG: Technical Assistance Grants

TASC: Technical Assistance Services for Communities

TBA: Targeted Brownfields Assessment

UST: Underground Storage Tank

EXECUTIVE SUMMARY

In December 2009, EPA's Office of Solid Waste and Emergency Response (OSWER) announced the Community Engagement Initiative (CEI) to enhance OSWER HQ and Regional offices' engagement with local communities and other stakeholders, and to help stakeholders meaningfully participate in decision-making processes related to the cleanup and reuse of contaminated sites. The CEI is comprised of 16 actions that affect many aspects of OSWER's work. This evaluation focuses on Action 7 and Action 13A, which address improving technical assistance (TA) and information dissemination (ID), respectively.[1] The CEI defines technical assistance (TA) as the provision of services, resources, and training focused on increasing community understanding of the relevant science, regulations and policy related to environmental issues.[2] Information dissemination (ID) refers to communication from EPA or state agencies to communities regarding environmental issues; CEI focuses on delivering the right information, in the right place, at the right time into existing guidance, training, and Agency outreach efforts.[3] Furthermore, this evaluation focuses on Superfund, RCRA Corrective Action (CA), and Brownfields programs within OSWER.

CEI includes a commitment to evaluate the effectiveness of OSWER program community engagement activities. OSWER envisions highly effective community engagement becoming a standard business practice across all of its programs, and furthermore wants to share lessons on successful community engagement throughout the Agency. As such, OSWER requested a formative evaluation for the CEI program. OSWER's goals for the evaluation were to establish a baseline of current community satisfaction with EPA's TA and ID practices, and to consider the feasibility of potential measures for tracking TA and ID moving forward.

EVALUATION QUESTIONS

The evaluation questions that we used to guide this evaluation are as follows:

1. What are the requirements and drivers for community involvement within the Superfund, RCRA Corrective Action, and Brownfields programs?
2. What is the baseline of current OSWER technical assistance and information dissemination activities, with respect to:
    a. Frequency of practice and program-to program variability?
    b. Proportion of communities that receive formal assistance through TAG, TASC, or other formal program?[4]

[1] ID is also sometimes referred to as Delivery of Information, or DoI.

[2] EPA CEI, Action 7- Evaluate and Improve EPA Technical Assistance Processes, Work Group Report on Recommendations, available at: http://www.epa.gov/oswer/engagementinitiative/7_action_recommendation_report.pdf

[3] EPA CEI, Action 13A- Delivery of Information, Summary of Draft Work Group Report, available at: http://www.epa.gov/oswer/engagementinitiative/13a_action_summary_report.pdf

[4] Formal technical assistance refers to TA that is delivered under the auspices of a TA program such as TAG, TASC, and TAG; information TA refers to TA delivered outside of a program.

c. Selection criteria and on-the-ground process for accessing TAG and TASC (for Superfund and RCRA CA only)?

d. Community assistance that is provided outside of formal programs (including helping to set up CAGs and providing ad-hoc assistance)?

e. Areas of unmet TA or ID need?

3. How can Superfund community involvement plans (CIPs) be used to improve technical assistance and delivery of info?

   a. Does every site have a CIP?

   b. What information is available on the implementation of CIPs?

   c. Are CIPs revised over time?

   d. Do CIPs, as they are currently used, ensure effective technical assistance and information delivery throughout the life of the project? Why or why not?

4. What is the baseline of customer satisfaction with OSWER technical assistance and information dissemination activities?

5. What measures can be used to assess the effectiveness and tangible outcomes of OSWER technical assistance and information dissemination activities across the lifecycle of site planning, remediation, and reuse?

6. How can these measures be used to improve OSWER technical assistance and information dissemination activities?

METHODOLOGY

The methodology for this evaluation combines a thematic analysis of qualitative data gathered from interviews with a review and synthesis of existing documentation. The complete methodology is included in Appendix A; it was completed in July of 2012. Important methodological updates that occurred after finalizing the evaluation methodology are discussed in Chapter 2.

IEc reviewed existing documentation and data to inform our responses to evaluation questions, as discussed in the methodology. We reviewed the following data sources:

- Documentation of community engagement requirements;
- Site inventory data for cleanup programs;
- Performance measurement resources (for Questions 5 and 6); and
- Existing satisfaction interviews.

IEc conducted 46 interviews with EPA HQ and regional contacts from Superfund, Brownfields, RCRA CA, as well as state RCRA CA contacts in Arkansas, California, Illinois, Missouri, New York, and South Carolina. IEc also conducted satisfaction interviews with contacts from community groups that had received technical assistance through the Superfund TAG program, and analyzed these data in conjunction with previous satisfaction interviews of service recipients conducted for the TASC contract. IEc conducted a thematic analysis of interview data, and synthesized interview data with

information gleaned from the document review as applicable, to develop evaluation findings.

STRENGTHS AND WEAKNESSES OF METHODOLOGY

The methodology employed has a number of strengths, including coverage of all three programs: Superfund, RCRA CA, and Brownfields. Notably, the methodology employed for this evaluation was sufficient for addressing most of the research questions, including all of Questions 1, 3, 5, and 6; and most of Question 2. Within Question 2 in particular, because IEc was able interview one contact for each of the three programs, in every region, we are able to accurately characterize the baseline of EPA's technical assistance and information dissemination activities. However, because we only interviewed six states that implement RCRA CA, and only had information on a few additional states from existing documentation, we cannot be sure if our findings on frequency of practice, and community assistance provided outside of formal programs, are representative of state RCRA CA programs overall.

For Question 4--establishing a baseline of satisfaction with technical assistance and information dissemination among communities--a key strength of the evaluation was the ability to combine analysis of new satisfaction interviews with existing interviews. We also achieved geographic diversity in our interviews. However, the methodology for Question 4 was limited by resources available to conduct interviews, and difficulties in identifying community contacts to interview, particularly within the RCRA CA program. Subsequently, a key limitation of our approach is that results for Question 4 on satisfaction with technical assistance and information dissemination cannot be extrapolated to all communities served by OSWER programs. Ideally, IEc would have conducted surveys or interviews using a statistically valid sample of those served for each OSWER program, to develop a true baseline of satisfaction with technical assistance and information dissemination criteria.[5] However, this approach would have required extensive resources to develop contact data (in particular for RCRA CA communities), and to develop and administer the survey or requisite number of interviews. In addition, programs expressed reservations about broadly surveying community groups affiliated with their programs, citing information burden.

Finally, the method by which IEc selected interviewees has inherent strengths and weaknesses. For the TASC contract, IEc was able to analyze all applicable data collected for Superfund to-date, which is a methodological strength. In addition, we were able to randomly select Superfund TAG grantees to interview. In contrast, as discussed above, IEc had to rely on TAB grantees to identify Brownfields community groups to interview, and we had to rely on RCRA CA regional and state interviewees to identify RCRA CA community groups to interview. Relying on these parties to identify interviewees can be a source of bias, although we have no evidence or suspicions that contacts cherry picked community contacts to participate in this evaluation.

[5] In addition to surveying a statistically valid sample of those served, it would also be methodologically preferable to survey multiple stakeholders associated with each site. One individual interviewee may not represent the perspective of all local stakeholders.

SUMMARY OF FINDINGS

High-level findings from the evaluation include the following:

- The EPA Superfund and Brownfields programs appear to have robust systems in place for delivering technical assistance and information to communities, including clear mandates and guidance, formal programs and mechanisms for delivering technical assistance, and adequate levels of EPA staffing and resources.
- RCRA CA appears to be meeting its mandate of providing information dissemination to community groups as required. However, in comparison to the Superfund and Brownfields programs, RCRA CA lacks many inputs helpful in ensuring the delivery of technical assistance to communities, including a lack of: regulatory mandates; adequate resources and staffing at EPA and state agencies; and up-to-date, program-specific guidance. Unmet community needs appear to be higher within the RCRA CA program than other programs, and satisfaction with technical assistance provided by states to communities under RCRA CA was rated lower on average by interviewees than for the other two programs.
- Compared to the other programs, it is more difficult to characterize the needs of RCRA CA communities nationally, and to track progress in meeting those needs, because the program is largely delegated to states, and EPA currently lacks mechanisms for collecting community engagement data from states. Thus, if EPA were to conduct regular tracking of measures of unmet needs and customer satisfaction, the Agency would need to work with states to implement a data collection system. In contrast, existing data collection systems employed by Superfund and Brownfields could potentially be augmented to track suggested measures.

Findings Summary by Evaluation Question

1. *What are the requirements and drivers for community involvement within the Superfund, RCRA Corrective Action, and Brownfields programs?*

Community involvement requirements are documented in the National Contingency Plan for Superfund and Brownfields.[6] All Superfund sites must have a Community Involvement Plan (CIP), and CIPs must be in place before remediation commences. The Brownfields Program is required to provide community involvement opportunities for sites that receive cleanup grants from EPA, as opposed to assessment grants, where community involvement is not required. RCRA CA's community involvement requirements are codified in a public participation manual for the program dating back to 1996. RCRA CA is only required to provide public notice during key phases of the corrective action process; TA is not required. Beyond requirements, additional drivers of

[6] NCP [40 CFR 300.430(2)(ii)]: states the following intent regarding community involvement: "(A) Ensure the public appropriate opportunities for involvement in a wide variety of site-related decisions, including site analysis and characterization, alternatives analysis, and selection of remedy; and (B) Determine, based on community interviews, appropriate activities to ensure such public involvement."

community involvement across the three programs include community demand and environmental justice concerns.

2. *What is the baseline of current OSWER technical assistance and information dissemination activities, with respect to:*

    a. *Frequency of practice and program-to program variability?* Superfund has the most extensive formal TA and ID practices of the three OSWER programs. CIPs are developed for each site and EPA has dedicated personnel in each region to assist Superfund communities. Superfund communities have access to both TAG and TASC. The Brownfields program requires its cleanup grantees, which are typically state and local governments, to provide TA, and the Brownfields program also administers the TAB program. RCRA CA complies with ID requirements, but TA is not required, and as such, TA is provided on a case-by-case basis based on perceived need and community interest. Because resource limitations precluded interviews with more than six states, it is important to understand that this evaluation cannot provide comprehensive information on RCRA CA community involvement at the state level.

    b. Proportion of communities that receive formal assistance through TAG, TASC, or other formal program?

Use of formal TA is summarized in Exhibit ES-1 below.

ES-1. Use of Formal Technical Assistance Programs

PROGRAM	FORMAL USE OF TA
Superfund	• Site count = 13,662 (1652 NPL site + 12,010 non-NPL sites) • 350 TAGs awarded to and 56 TASC projects used at Superfund sites
RCRA CA	• Site Count = 3747 • Formal TA is rarely used at RCRA CA sites • Only seven RCRA CA sites have used TASC assistance
Brownfields	• No official program site count because all communities eligible • 833 Brownfields communities have received TAB assistance since 2008

    c. Selection criteria and on-the-ground process for accessing TAG and TASC (for Superfund and RCRA CA only)?

    As a grant program, the TAG program has formal selection criteria covering: the types of groups that are eligible to receive TAG funds; group administrative and management experience; group past performance with federal grants; and group legal incorporation requirements. In cases where multiple parties from the same community compete for TAG funds, EPA uses secondary criteria to make a selection; these include community representativeness, communication planning, and the potential for measurable environmental results.

Community groups do not apply for TASC directly; they receive access to the TASC contract services based on recommendations from regional staff to EPA HQ. HQ and regional interviewees within the Superfund and RCRA CA programs stated that there are no formal selection criteria for OSWER programs to access TASC. However, communities that are selected for TASC funds typically share one or more of the following conditions:

- A lack of other sources of funding for community TA needs;
- A high level of community interest in the cleanup process;
- Environmental justice concerns;
- Short-term technical assistance needs; and/or
- Superfund communities that are not interested in forming a TAG group.

d. *Community assistance that is provided outside of formal programs (including helping to set up CAGs and providing ad-hoc assistance)?*

The Superfund program routinely provides TA outside of formal programs, in addition to providing extensive support within formal programs. Within the Brownfields program, communities with EPA cleanup grants receive assistance through the grantee (typically a local government entity). Nearly all TA provided to RCRA CA communities is conducted outside of formal programs. Regions and states administering RCRA CA make decisions about where to offer TA based on community requests and staff assessment of need.

e. *Areas of unmet TA or ID need?*

Most interviewees identified some unmet TA and/or ID needs. However, as shown in Exhibit ES-2 below, interviewees noted a somewhat higher incidence of unmet needs among RCRA CA communities than among Superfund or Brownfields communities.

Exhibit ES-2. Unmet ID and TA needs

	NOTED ANY UNMET TA NEEDS	NOTED ANY UNMET ID NEEDS
RCRA CA	HQ, 8 Regions	7 Regions
Superfund	HQ, 6 Regions	7 Regions
Brownfields	HQ, 4 Regions	5 Regions

Moreover, RCRA CA HQ and eight of 10 regional contacts indicated that resource limitations are a barrier to providing TA under RCRA CA; in contrast, only four Brownfields contacts and two Superfund contacted indicated that lack of resources is an impediment to delivering TA.

3. *How can Superfund community involvement plans (CIPs) be used to improve technical assistance and delivery of info?*

a. *Does every site have a CIP?* According to all Superfund interviewees, every Superfund site has a CIP.

b. *What information is available on the implementation of CIPs?* According to all Superfund regional interviewees, CIPS are tracked and maintained by regional staff. CIP updates are variable. From the perspective of tenured EPA staff, CIPs are most valuable at the beginning of the Superfund process. From the perspective of community members and new EPA staff, CIPs and updates have value throughout the cleanup process. Interviewees noted that CIPs may be improved by more frequent, targeted revisions and by making them more readable by community members.

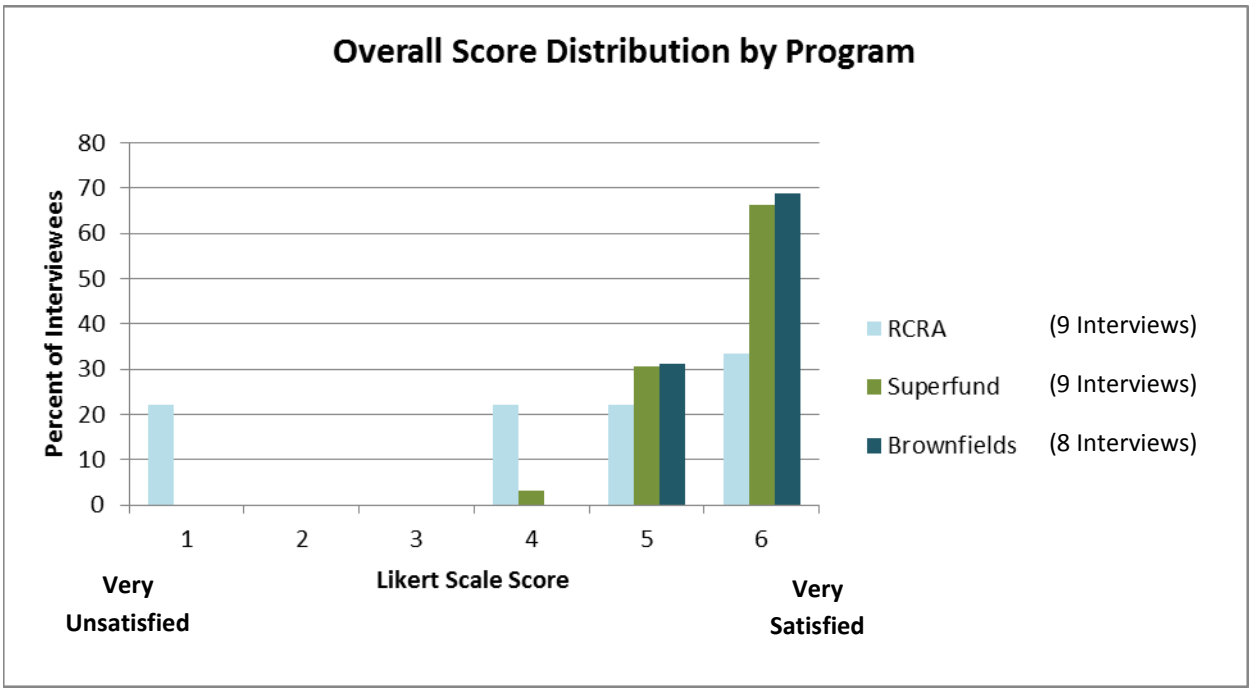
c. *Are CIPs revised over time?* According to Superfund interviewees, CIPs are revised over time but revisions sometimes lag project milestones.

d. *Do CIPs, as they are currently used, ensure effective technical assistance and information delivery throughout the life of the project? Why or why not?* Six of 10 regional interviewees said that CIPs are *not* an important tool for ongoing technical assistance and information delivery. The general sentiment among Superfund regional interviewees is that CIPs are helpful to organize community engagement at the beginning of the Superfund process, but are not used by EPA staff as a resource over time. EPA tends to set aside the document after the start of the project, instead relying on ad-hoc communication with community members.

   Because CIP updates often lag behind project changes, they may not ensure effective technical assistance and information delivery throughout the life of the project given lagging updates. However, as discussed under Evaluation Question 4 findings, satisfaction with technical assistance and information dissemination is high among Superfund community contacts participating in this evaluation that have received a TAG, and across the Superfund community contacts that have used the TASC contract.

e. *What is the baseline of customer satisfaction with OSWER technical assistance and information dissemination activities?* Community contacts rated their overall satisfaction with assistance services provided a scale of one to six; with a score of one being very dissatisfied to a score of 6 being very satisfied. As shown in Exhibit ES-3 below, interviewees noted consistently high satisfaction overall scores for Superfund and Brownfields programs, while scores for RCRA CA were more mixed. However, regarding RCRA CA, it should be noted that at the lower end, only two interviews rated their overall satisfaction as a "1" with assistance provided by RCRA CA states; the majority of RCRA CA sites provided favorable overall ratings for assistance received. Satisfaction rates are very similar between recipients of TAG grants and users of the TASC contract. Common suggestions from community contacts for improving TA included making outreach materials more accessible by using visual aids and plainer language; and reaching out to community members often or more actively.

Exhibit ES-3. Customer Satisfaction Score Summary



4. *What measures can be used to assess the effectiveness and tangible outcomes of OSWER technical assistance and information dissemination activities across the lifecycle of site planning, remediation, and reuse?*
5. *How can these measures be used to improve OSWER technical assistance and information dissemination activities?*

   IEc developed a potential menu of output, short-term outcome, and long-term outcome measures for tracking the progress of community engagement in OSWER programs. We focused output measures on tracking unmet needs, and outcome measures on gauging community satisfaction. IEc also considered other types of measures, but honed in on the measures presented in Exhibit ES-4 after considering feasibility factors including:

   - The ability to define objective measure(s);
   - The need to develop and implement new information collection infrastructure;
   - Feedback from interviewees on potential measures; and
   - IEc's professional judgment regarding the likelihood of the measure being accepted and successfully implemented by the OSWER programs.

   It is important to note that IEc does not suggest that EPA consider or adopt *all* of the measures in Exhibit ES-4.

Exhibit ES-4. IEc Recommendations for a Menu of Potential Measures

OUTPUT MEASURES

- Proportion of Superfund communities that applied for TAG assistance, but have not received assistance
- Proportion of Brownfields communities that requested TAB or other form of K6 assistance, but have not received assistance
- Proportion of Superfund and RCRA CA communities that were recommended by a region for TASC assistance, but have not received assistance
- Proportion of RCRA CA communities that have asked a state or region for any form of assistance, but have not receive assistance
- Number/Percent of RCRA CA communities that have received TA
- Number/Percent EPA Regions that have offered TA/ID training in the past year

SHORT-TERM OUTCOME MEASURES

- The number/proportion of community members filing complaints related to the provision of TA with Superfund/Brownfields/RCRA CA regional staff annually.

LONG-TERM OUTCOME MEASURES

- Proportion of TAG/TASC/TAB communities that have received a community satisfaction survey that are "satisfied" with the information provided by EPA throughout the cleanup process *(tracked individually for each program).*
- Proportion of TAGs/TASC/TAB/RCRA CA communities that have received a community satisfaction survey that are "satisfied" with the assistance provided by their technical advisor (each of the four measures tracked individually).

CHAPTER 1 | INTRODUCTION AND EVALUATION SCOPING

In December 2009, EPA's Office of Solid Waste and Emergency Response (OSWER) announced the Community Engagement Initiative (CEI) to enhance OSWER HQ and Regional offices' engagement with local communities and other stakeholders, and to help stakeholders meaningfully participate in decision-making processes related to the cleanup and reuse of contaminated sites. CEI includes a commitment to evaluate the effectiveness of OSWER program community engagement activities. OSWER envisions highly effective community engagement becoming a standard business practice across all of its programs, and furthermore wants to share lessons on successful community engagement throughout the Agency. As such, OSWER requested a formative evaluation for the CEI program. A formative evaluation is a prospective evaluation designed to help newer programs establish baseline conditions, and establish measures to track program implementation and progress over time.

The CEI is comprised of 16 actions that affect many aspects of OSWER's work. Exhibit 1-1 summarizes these actions.[7] This evaluation focuses on Action 7 and Action 13A (highlighted in Exhibit 1-1), which address improving technical assistance (TA) and information dissemination (ID), respectively. The CEI defines technical assistance (TA) as the provision of services, resources, and training focused on increasing community understanding of the relevant science, regulations and policy related to environmental issues.[8] Information dissemination (ID) refers to communication from EPA or state agencies to communities regarding environmental issues; CEI focuses on delivering the right information, in the right place, at the right time into existing guidance, training, and Agency outreach efforts.[9] Unlike some other CEI Actions that are program-specific, Actions 7 and 13A are cross-program actions that can help communities participate in OSWER processes more effectively. OSWER's goals for the evaluation were to establish a baseline of current satisfaction with EPA's TA and ID practices, and to consider the feasibility of potential measures for tracking TA and ID moving forward.

EPA contracted with Industrial Economics (IEc) to conduct the evaluation under the oversight of the Agency's Evaluation Support Division (ESD). ESD, IEc, and representatives from OSWER comprised the evaluation team. IEc prepared this evaluation report, and the terms "we" and "our" in this report refer to the authors at IEc.

EVALUATION SCOPING

IEc conducted a scoping task to inform this project. First, we reviewed publicly-available information for each OSWER cleanup program (Superfund, Brownfields, RCRA Corrective

[7] See OWSER's website about the Community Engagement Initiative at http://www.epa.gov/oswer/engagementinitiative/, last visited July 30, 2013.

[8] EPA CEI, Action 7- Evaluate and Improve EPA Technical Assistance Processes, Work Group Report on Recommendations, available at: http://www.epa.gov/oswer/engagementinitiative/7_action_recommendation_report.pdf

[9] EPA CEI, Action 13A- Delivery of Information, Summary of Draft Work Group Report, available at: http://www.epa.gov/oswer/engagementinitiative/13a_action_summary_report.pdf

Action, and the Underground Storage Tank Program) to identify the formal and informal processes through which the programs conduct TA and ID. This consisted of reviewing program websites, guidance, regulations, and grant RFPs for program policies on TA or ID. Then we conducted interviews with contacts at EPA HQ for each program to sharpen our understanding of the framework through which these programs conduct TA and ID, as well as to determine additional TA and ID policies that we did not see in our review of publicly-available information. We also used these initial calls to determine the most effective research methods to answer our evaluation questions.

Exhibit 1-1. Community Engagement Initiative (CEI) Actions

Action 1	Decision-Making Processes and Guidance
Action 2	Underground Storage Tank (UST) Programs
Action 3	Best Community Engagement Practices for RCRA
Action 4	OSWER Regulation and Guidance Development
Action 5	Community Engagement Policies and Activities related to Enforcement
Action 6	CERCLA Enforcement Involving Federal Facilities
Action 7	**EPA Technical Assistance Processes**
Action 8	Community Action for a Renewed Environment (CARE) Program
Action 9	Brownfields Area-Wide Planning Pilot Program
Action 10	Public Health Information on OSWER Projects
Action 11	Risk Communication Processes and Comprehensive Education Program
Action 12	Sampling and Testing Results
Action 13	**Delivery of Information:** **13A: At-Risk and Remote Communities** 13B: Superfund Repositories
Action 14	Community Engagement Training Program
Action 15	Measures of Effectiveness and Annual Report
Action 16	Environmental Workforce Development and Job Training Program

Another aspect of our scoping work was to determine how concurrent efforts within EPA relate to aspects of the evaluation. With many CEI initiatives in progress, the evaluation team was concerned about overlap between this evaluation and other efforts, particularly within RCRA Corrective Action (RCRA CA). Thus, we spoke to programs about the status of ongoing CEI initiatives and scoped this evaluation accordingly. The results of our scoping task are as follows:

Exclusion of the Underground Storage Tank (UST) Program

IEc recommended excluding the UST program from the evaluation based on scoping research. State UST programs do not conduct much TA; most UST sites are not complicated or technically challenging enough to require it. In rare instances of a highly contaminated tank site with community exposure, states assess the need for public participation on a case-by-case basis. UST is aware of only one state that has funding for conducting TA. Similarly, state UST programs typically do not conduct ID activities, except in rare cases of community exposures.

In cases of public exposures, states must notify affected communities, as reflected in EPA UST regulations. However, even in this case, the regulations do not require much interaction; they are summarized below (emphases are IEc's):

- (a) The public should be notified of every confirmed release that requires a corrective action plan.
- (b) "The implementing agency must ensure that site release information and decisions concerning the corrective action plan are made available to the public for inspection upon request."
- (d) "Before approving a corrective action plan, the implementing agency *may* hold a public meeting to consider comments on the proposed corrective action plan *if there is sufficient public interest,* or for any other reason."[10]

It should be noted that EPA does not have funding for conducting TA at UST sites, nor does the Agency provide guidance on the topic. One exception is Indian country, where in some cases, EPA Regional staff communicate information regarding the UST program to the tribal governments, who are then responsible for informing their communities and the affected public.

Thus, the evaluation team agreed not to include UST in this evaluation; EPA HQ UST contacts concurred with this decision. Factors in this decision included:

- General consensus that UST sites are low-risk and low priority;
- Lack of TA and ID activity at UST sites (except in cases of release);
- EPA's weak regulatory and policy framework regarding TA and ID at UST sites (TA is not required; and only limited ID is required); and
- Limited evaluation resources.

However, it should be noted that because the UST program was omitted from the evaluation, no judgment has been made about the about the effectiveness of the program's community engagement activities.

Superfund, Brownfields, and RCRA Corrective Action Programs Have Different Structures that Affect Data Availability and Collection

Superfund works directly with communities affected by Superfund sites, has ultimate authority over the site remediation process, and retains control over community engagement as part of that process. Superfund offers a grant program directly to affected communities, the Technical Assistance Grant (TAG), and Superfund site managers can also take advantage of the Technical Assistance Services for Communities (TASC) Contract administered by OSWER (use of TAG and TASC is discussed in detail in Chapter 3). Superfund sites are required to have a community involvement plan for each site. As such, EPA Regional staff have direct contact with community organizations involved in Superfund cleanup activities. This structure differs significantly from the other OSWER programs.

[10] 40 CFR Ch. 1 (7-1-05 Edition) § 280.67 Public Participation provisions from Subpart F—Release Response and Corrective Action for UST Systems Containing Petroleum or Hazardous Substances (http://www.epa.gov/swerust1/fedlaws/280_f.pdf)

The Brownfields program provides grants to local governments and non-profit organizations to cleanup and reuse sites, and community engagement is required as part of cleanup grants. So, recipients of EPA brownfields grants provide technical assistance to community groups; EPA does not provide or administer this assistance. In addition, the EPA Brownfields program administers the Brownfields Training, Research, and Technical Assistance K6 Grant program, which among other things, provides funding to academic and research organizations to work with community organizations on public participation issues. The Technical Assistance for Brownfields (TAB) program is the main component of the K6 grant program focused intently on TA and ID. Under TAB, EPA provides grant support to four regional organizations, which in turn provide technical assistance to Brownfields communities.

The RCRA Corrective Action (CA) program is delegated to 43 states. In delegated states, at most RCRA CA sites, states take the lead on cleanup, including community engagement (although EPA regions sometimes provide TA at sites in delegated states). The RCRA CA program has official guidance on public participation, but it has not been updated since 1996.[11] EPA does not track state-led RCRA CA community engagement activities, and does not have direct contacts with community organizations involved in site cleanup activities, except for the minority of sites where EPA is implementing the cleanup, or in the few cases where a RCRA CA community has been provided with assistance through the TASC contract. Thus, it was important for IEc to interview state RCRA CA coordinators for this evaluation.

Survey Work was Impractical

Both the Superfund and Brownfields contacts expressed reservations about surveying community groups affiliated with their program, but were more amenable to interviews. In addition, Superfund has already done a significant amount of work on satisfaction for TASC, using a well-constructed interview guide that asks participants to rate specific aspects of TA and ID. Upon reviewing the satisfaction questionnaire used by Superfund for TASC, and talking with Superfund's TASC contractor, Skeo, IEc concluded that asking specific and customized questions (e.g., about specific workshops, materials, and communications) is the best strategy for ensuring that participants provide feedback on the TA and ID *process*, as opposed to cleanup or redevelopment outcomes, which EPA typically cannot control. However, one cannot ask customized questions via a survey. Thus, IEc recommended conducting interviews for Superfund TAG, Brownfields, and RCRA CA using the same tool as Skeo, which provided us with consistent information to compare across programs.

EVALUATION QUESTIONS

The evaluation questions that we used to guide this evaluation are as follows:

1. What are the requirements and drivers for community involvement within the Superfund, RCRA Corrective Action, and Brownfields programs?

[11] *RCRA Public Participation Manual*, 1996 Edition, available at: http://www.epa.gov/osw/hazard/tsd/permit/pubpart/manual.htm

2. What is the baseline of current OSWER technical assistance and information dissemination activities, with respect to:
    a. Frequency of practice and program-to program variability?
    b. Proportion of communities that receive formal assistance through TAG, TASC, or other formal program?
    c. Selection criteria and on-the-ground process for accessing TAG and TASC (for Superfund and RCRA CA only)?
    d. Community assistance that is provided outside of formal programs (including helping to set up CAGs and providing ad-hoc assistance)?
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3. How can Superfund community involvement plans (CIPs) be used to improve technical assistance and delivery of info?
    a. Does every site have a CIP?
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    c. Are CIPs revised over time?
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4. What is the baseline of customer satisfaction with OSWER technical assistance and information dissemination activities?
5. What measures can be used to assess the effectiveness and tangible outcomes of OSWER technical assistance and information dissemination activities across the lifecycle of site planning, remediation, and reuse?
6. How can these measures be used to improve OSWER technical assistance and information dissemination activities?

LOGIC MODELS

To illustrate the various components of community engagement in OSWER, and specifically the ID and TA tasks within the CEI, EPA and IEc developed three logic models (i.e., graphical representations of the relationships between program inputs, outputs, and intended changes in knowledge/attitude, behavior, and condition). The first logic model (Exhibit 1), illustrates the design of the community engagement process within OSWER. It does not represent how community engagement necessarily works at all sites; instead, the model represents the process through which community engagement is designed to function. The next two logic models (Exhibits 2 and 3), outline the design of CEI Actions 7 (TA) and 13A (ID), which are the foci of this evaluation. These two logic models illustrate the conceptual design of how these Actions will be implemented to achieve their expected results. All three models are needed to understand the community involvement process and how Actions 7 and 13A are intended to improve the process.

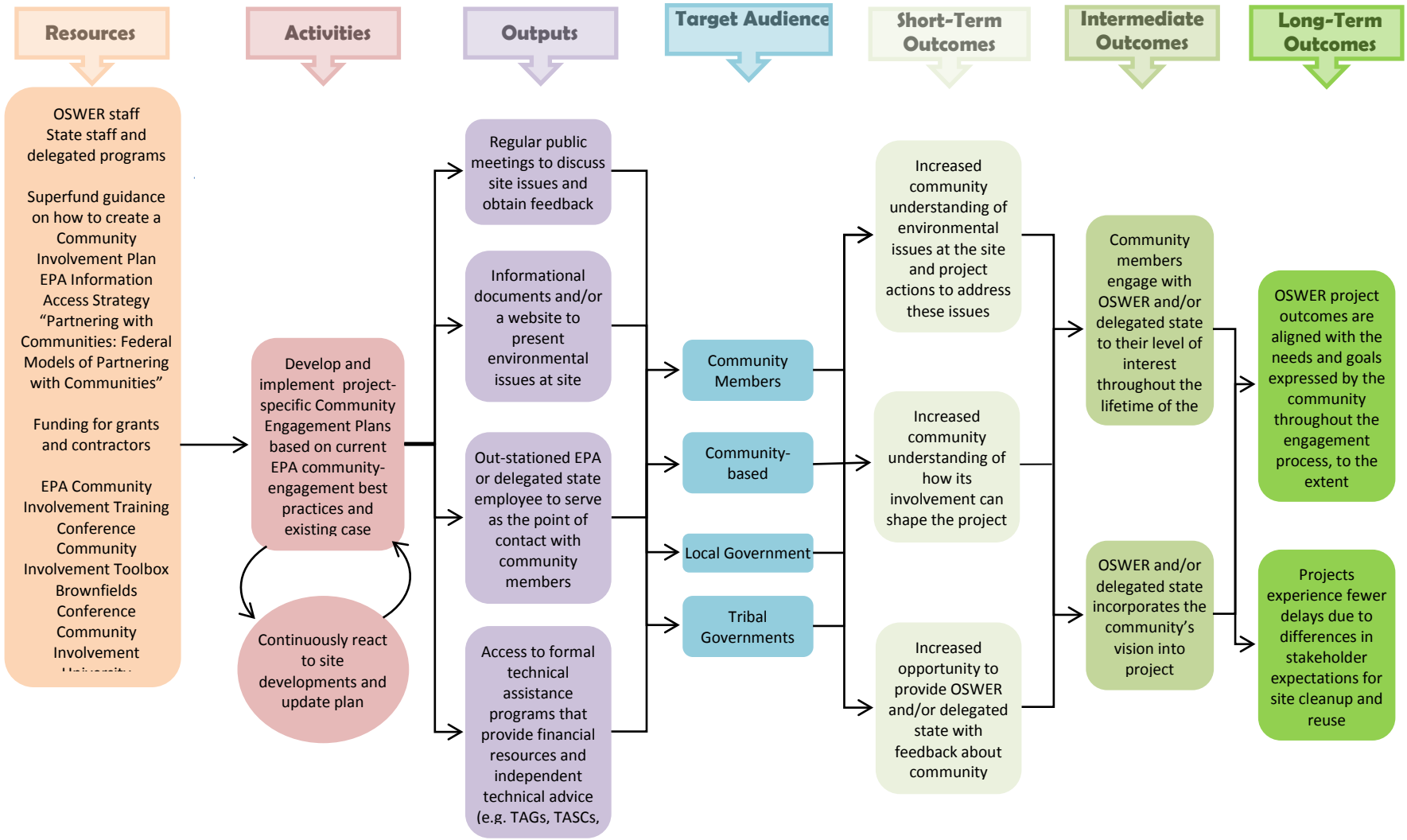
The key components of the models include:

- **Resources** — staff, contractor support, partners, and funds dedicated to the program.
- **Activities** — the specific procedures or processes used to achieve program goals. OSWER's community engagement activities consist of developing site-specific Community Engagement Plans and continually updating the plans as community needs change. For the CEI Actions 7 and 13A, activities focus on examining current ID and TA practices for opportunities for expansion and revision.
- **Outputs** — the immediate products that result from activities, which are often used to measure short-term progress. OSWER's community engagement outputs consist of holding public meetings, generating documents for public consumption, and providing technical assistance to communities. Example outputs of the CEI Actions are community-centric training modules, brochures, and expansion of existing formal technical assistance programs.
- **Target Audiences** — groups and individuals targeted by community engagement activities and outputs. For example, OSWER's community engagement audiences include community members, community-based organizations, and both local and tribal governments. In addition to these groups, some activities and outputs of CEI Actions 7 and 13A target EPA staff and delegated state programs.
- **Short-Term Outcomes** — changes in knowledge, awareness, attitudes, understanding, and skills resulting from program outputs that are causally linked to community engagement. For example, CEI Action 7 is designed to increase stakeholders' awareness of EPA's technical assistance programs.
- **Intermediate Outcomes** — changes in behavior resulting from changes in knowledge and attitude. For example, CEI Action 7 is designed to increase stakeholders' use of EPA's technical assistance programs.
- **Long-Term Outcomes —** the overarching goals of the program, which in the case of the CEI Actions 7 and 13A is to ensure the community has a more informed voice in decisions at contaminated sites within their community.

Finally, the logic model makes note of external factors that are beyond the direct control of EPA's community engagement program, but may influence program outcomes. For example, external factors for Action 13A may include available resources and lack of community organization.

Exhibit 1-2. LOGIC MODEL FOR COMMUNITY ENGAGEMENT IN OSWER

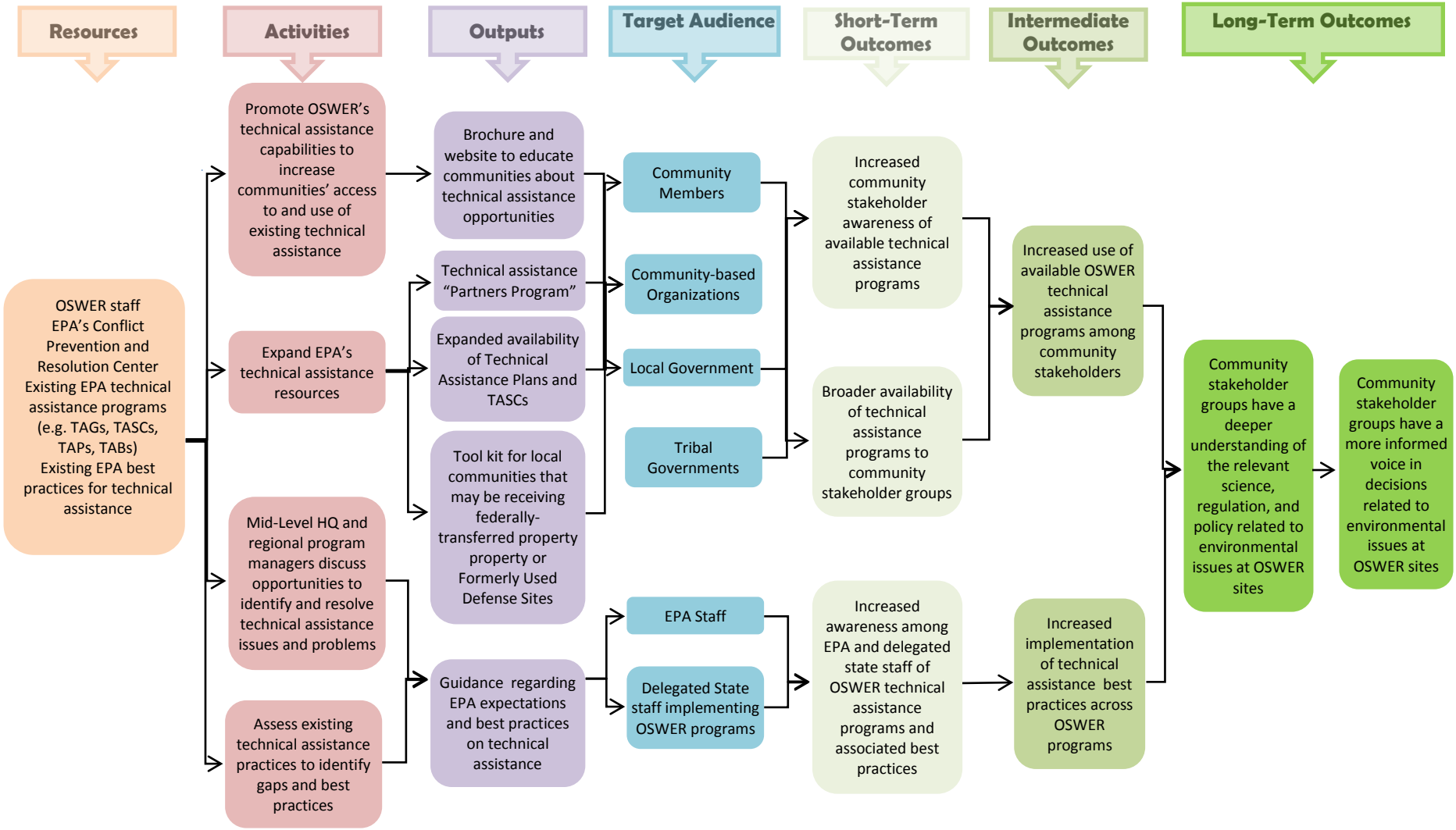
Goal: To facilitate community members' participation in government decisions on land cleanup, land reuse, and emergency response.



External Factors: Budget constraints, limited existing community-engagement best practices, limited flexibility to incorporate community desires

Exhibit 1-3. LOGIC MODEL FOR CEI ACTION 7: EVALUATE AND IMPROVE EPA TECHNICAL ASSISTANCE PROCESSES

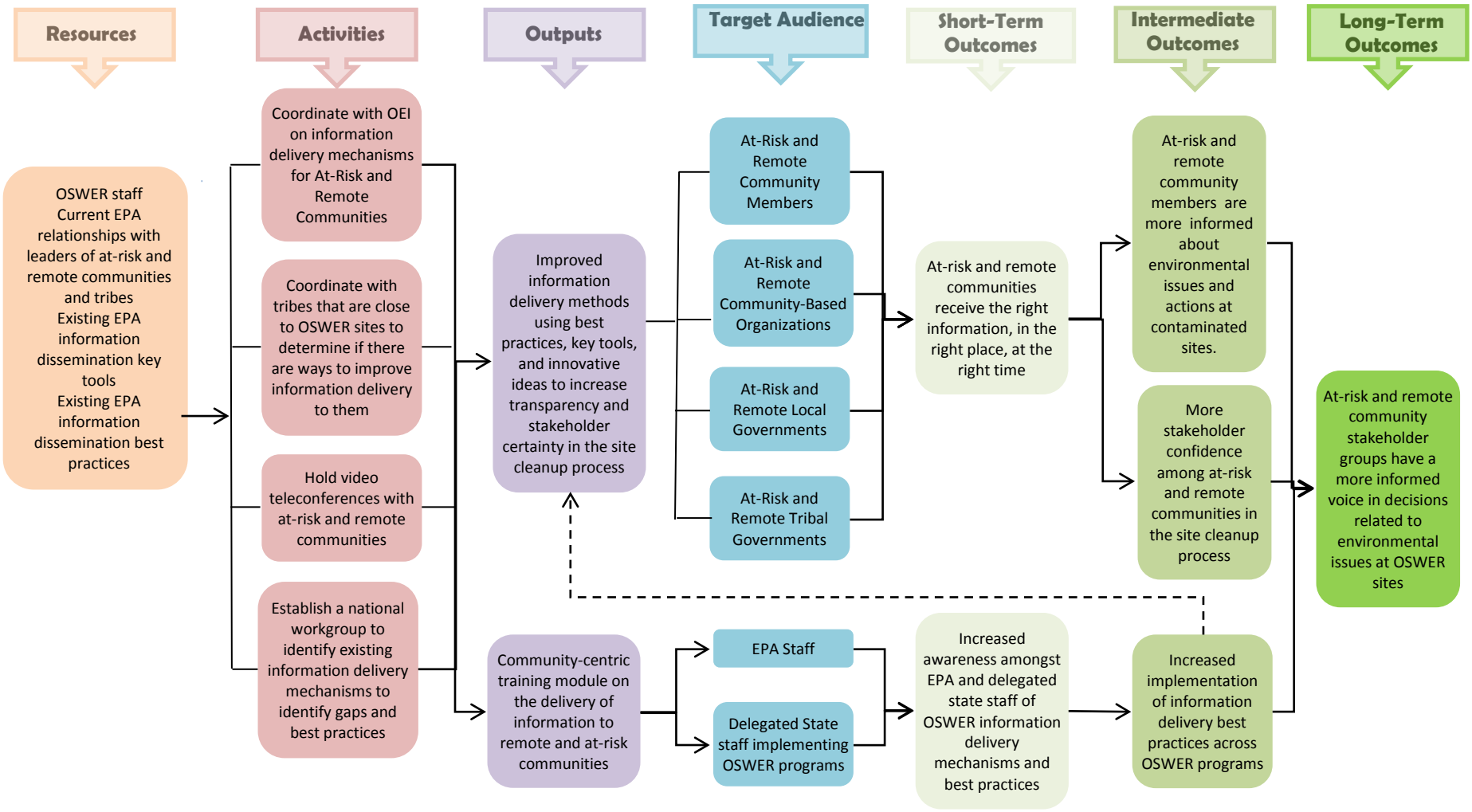
Goal: To improve and broaden the availability of technical assistance to communities so that community members can better understand site issues, and participate in an informed way during the decision-making process.



External Factors: Limited resources, some communities may not be a good candidate for technical assistance because of: (1) a lack of organizational structure, (2) a lack of agreement among community stakeholders, and/or (3) assistance saturation within community.

Exhibit 1-4. LOGIC MODEL FOR CEI ACTION 13A: EVALUATE AND IMPROVE DELIVERY OF INFORMATION - AT-RISK AND REMOTE COMMUNITIES

Goal: To develop options for improvement in how information is delivered to a-risk and remote communities and to enhance community members' knowledge and ability to meaningfully participate in decision-making processes.



External Factors: Available resources (especially for travel, in-person meetings at affected communities, and translation), lack of community organization.

CHAPTER 2 | METHODOLOGY

The methodology for this evaluation combines a thematic analysis of qualitative data gathered from interviews with a review and synthesis of existing documentation. The complete methodology is included in Appendix A; it was completed in July of 2012. Important methodological updates that occurred after finalizing the evaluation methodology are discussed in this Chapter.

REVIEW OF EXISTING DATA

IEc reviewed existing documentation and data to inform our responses to evaluation questions, as discussed in the methodology. We reviewed the following data sources:

- Documentation of community engagement requirements;
- Site inventory data for cleanup programs;
- Performance measurement resources (for Questions 5 and 6); and
- Existing community satisfaction interviews (as discussed above).

Use of these documents and data is discussed in more detail in the context of Findings in Chapter 3.

INTERVIEWS

IEc conducted 46 interviews with EPA HQ and regional contacts from Superfund, Brownfields, RCRA CA, as well as state RCRA CA contacts in Arkansas, California, Illinois, Missouri, New York, and South Carolina. Exhibit 2-1 below summarizes these interviews. EPA HQ contacts helped us to identify EPA regional contacts; and regional RCRA CA contacts helped to identify state contacts.

Exhibit 2-1. Interviews with EPA and State Contacts

INTERVIEWS	COUNT	DESCRIPTION
EPA HQ	7	Interviewed HQ staff: Superfund (2), Brownfields (2), and RCRA CA (3)
EPA Regions	30	Interviewed Superfund, Brownfields, and RCRA CA HQ staff in all 10 regions (1 interview for each region)
RCRA CA State	6	Interviewed staff from 6 delegated states
Other	3	Interviewed CPRC contact, TASC contractor, Brownfields K6 grantee
TOTAL	**46**	

IEc also conducted satisfaction interviews with contacts from community groups that had received technical assistance. As discussed in the methodology, we conducted these interviews using the format developed and implemented by another contractor for use

in measuring customer satisfaction under the TASC contract. A summary of satisfaction interviews is included in Exhibit 2-2 below.

Exhibit 2-2. Satisfaction Interview Summary

INTERVIEWS	COUNT	DESCRIPTION
Superfund TASC	22	(Another contractor previously conducted interviews in 22 communities)
Superfund TAG	9	Interviewed TAG recipients in 8 communities
RCRA CA	7	Interviewed recipients of state technical assistance in 7 communities. No contacts from recipients of EPA-led RCRA CA sites were available for interview.
Brownfields TAB and K6	8	Interviewed 7 recipients of technical assistance under TAB in 7 communities and 1 recipient of K6 assistance in 1 community
TOTAL	**46**	

IEc identified satisfaction interviewees in various ways. The Superfund program maintains a list of TAG recipients; we randomly selected one primary and one backup TAG recipient to contact in each region. We subsequently conducted nine TAG interviews (a TAG interviewee could not be reached in one region). The Brownfields program does not maintain a list of communities that have received assistance under TAB, and the intensiveness of TAB assistance varies by community group. Hence, we asked all four TAB grantees and the one K6 grantee that does community engagement work to identify community contacts for satisfaction interviews. Specifically, we asked the TAB grantees to identify contacts from community groups that received a substantial degree of assistance. Because the TAB grantees are regional, this approach provided geographical diversity. For RCRA CA, we asked EPA regional and state contacts interviewed to help identify community contacts, as there is no single list of RCRA CA communities that have received technical assistance at either the EPA or state level.

We analyzed results from IEc's satisfaction interviews in conjunction with existing Superfund TASC satisfaction interviews. We were able to analyze 22 existing TASC interviews in addition to the satisfaction interviews that IEc conducted.[12] A notable difference in IEc interviews and previously conducted satisfaction interviews is that some of the previous interviews contained scores from multiple community contacts, while all of IEc's scores are from a single contact for each site.

[12] Of the 56 Superfund communities that have accessed TASC, only 22 had satisfaction interviews that could be used. The main reason is that community satisfaction interviews are conducted towards the end of the cleanup process, and many of the 56 sites have cleanup ongoing. Also, some of the satisfaction interviews previously conducted were joint interviews with an EPA representative and a community contact, but the contractor provided only the EPA representative scoring for some of these interviews. We excluded these communities from our analysis.

Thematic Analysis of Interview Data

IEc conducted a thematic analysis of interviews. We developed interview guides (see Methodology document in Appendix A of this report) to guide each interview. We developed a thematic analysis workbook in MS Excel that contained one worksheet for each evaluation question. We cross-walked each interview question with applicable evaluation question(s) and recorded this coding within the spreadsheet for each evaluation question. Then, we recorded interviewee responses to each interview questions in the applicable spreadsheets. All responses to the same interview question were recorded on the same row. Once we entered all interview data, we reviewed responses to each interview question one by one, and identified key themes for each interview questions. For many interview questions, we counted the number of times interviewees provided the same response. We summarized an overall response to each interview question in the spreadsheet, noting areas of consensus and conflict, and noting if there were clear schisms between different types of interviewees. We then summarized responses for the interview questions associated with the same evaluation question, and brought in information gleaned from the document review as applicable, to develop findings for our evaluation questions.

STRENGTHS AND WEAKNESSES OF METHODOLOGY

The methodology employed has a number of strengths, including coverage of all three programs: Superfund, RCRA CA, and Brownfields. Notably, the methodology employed for this evaluation was sufficient for addressing most of the research questions, including all of Questions 1, 3, 5, and 6; and most of Question 2. Within Question 2 in particular, because IEc was able interview one contact for each of the three programs, in every region, we are able to accurately characterize the baseline of EPA's technical assistance and information dissemination activities. However, because we only interviewed six states that implement RCRA CA, and only had information on a few additional states from existing documentation, we cannot be sure if our findings on frequency of practice, and community assistance provided outside of formal programs, are representative of state RCRA CA programs overall.

For Question 4--establishing a baseline of satisfaction with technical assistance and information dissemination among communities--a key strength of the evaluation was the ability to combine analysis of new satisfaction interviews with existing interviews. We also achieved geographic diversity in our interviews. However, the methodology for Question 4 was limited by resources available to conduct interviews, and difficulties in identifying community contacts to interview, particularly within the RCRA CA program. Subsequently, a key limitation of our approach is that results for Question 4 on satisfaction with technical assistance and information dissemination cannot be extrapolated to all communities served by OSWER programs. Ideally, IEc would have conducted surveys or interviews using a statistically valid sample of those served for each OSWER program, to develop a true baseline of satisfaction with technical assistance and information dissemination criteria.[13] However, this approach would have

[13] In addition to surveying a statistically valid sample of those served, it would also be methodologically preferable to survey multiple stakeholders associated with each site. One individual interviewee may not represent the perspective of all local stakeholders.

required extensive resources to develop contact data (in particular for RCRA CA communities), and to develop and administer the survey or requisite number of interviews. In addition, programs expressed reservations about broadly surveying community groups affiliated with their programs, citing information burden.

Finally, the method by which IEc selected interviewees has inherent strengths and weaknesses. For the TASC contract, IEc was able to analyze all applicable data collected for Superfund to-date, which is a methodological strength. In addition, we were able to randomly select Superfund TAG grantees to interview. In contrast, as discussed above, IEc had to rely on TAB grantees to identify Brownfields community groups to interview, and we had to rely on RCRA CA regional and state interviewees to identify RCRA CA community groups to interview. Relying on these parties to identify interviewees can be a source of bias, although we have no evidence or suspicions that contacts cherry picked community contacts to participate in this evaluation.

CHAPTER 3 | FINDINGS

This section presents evaluation findings by evaluation question. High-level findings from the evaluation include the following:

- The EPA Superfund and Brownfields programs appear to have robust systems in place for delivering technical assistance and information to communities, including clear mandates and guidance, formal programs and mechanisms for delivering technical assistance, and adequate levels of EPA staffing and resources.
- RCRA CA appears to be meeting its mandate of providing information dissemination to community groups as required. However, in comparison to the Superfund and Brownfields programs, RCRA CA lacks many inputs helpful in ensuring the delivery of technical assistance to communities, including a lack of: regulatory mandates; adequate resources and staffing at EPA and state agencies; and up-to-date, program-specific guidance. Unmet community needs appear to be higher within the RCRA CA program than other programs, and satisfaction with technical assistance provided by states to communities under RCRA CA was rated lower on average by interviewees than for the other two programs.
- Compared to the other programs, it is more difficult to characterize the needs of RCRA CA communities nationally, and to track progress in meeting those needs, because the program is largely delegated to states, and EPA currently lacks mechanisms for collecting community engagement data from states. Thus, if EPA were to conduct regular tracking of measures of unmet needs and customer satisfaction, the Agency would need to work with states to implement a data collection system. In contrast, existing data collection systems employed by Superfund and Brownfields could potentially be augmented to track suggested measures.

QUESTION 1: WHAT ARE THE REQUIREMENTS AND DRIVERS FOR COMMUNITY INVOLVEMENT (CI) WITHIN THE SUPERFUND, RCRA CORRECTIVE ACTION (CA), AND BROWNFIELDS PROGRAMS?

Summary of Methods to Address Question 1

- Review of documents to identify requirements
- Interviews with staff at OSWER HQ and regions to explore knowledge of requirements and collect information on additional CI drivers

Findings on Requirements

Each Superfund site must develop a community involvement plan (CIP) and update it as necessary. The National Contingency Plan (NCP) requires developing a CIP "based on community interviews and other relevant information, specifying the community

relations activities that the lead agency expects to undertake during the remedial response." The NCP specifies that the CIP must be in place before remedial investigation field activities start "to the extent practicable." [14] Requirements for TA and ID under Superfund match the perception of requirements from Superfund staff; Superfund HQ contacts and all 10 Superfund regional contacts interviewed indicated that CIPs are required.

Requirements for Brownfields found in the National Contingency Plan dictate that, for cleanup grants only, EPA must develop community relations plans and make cleanup plans publicly available. In addition, according to Brownfields HQ interviewees, National Environmental Policy Act (NEPA) requirements applicable to brownfields include holding public meetings, answering comments, and making grant proposals publicly available. Part of the scoring for Brownfields grant applications includes evaluation criteria for community engagement. Brownfields HQ correctly indicated that technical assistance and information dissemination are required for cleanup grants. In addition, eight out of 10 Brownfields regional interviewees indicated that this activity is required.

Under RCRA CA, a facility owner/operator is required to provide public notice during key phases of the CA process, as documented in the 1996 RCRA Public Participation Manual. Technical assistance is not required. However, seven of 10 RCRA CA regional contacts, and four out of six RCRA CA state contacts, indicated that the program is required to provide both technical assistance and information dissemination to affected communities.

Findings on Additional Drivers

In addition to requirements discussed above, several interviewees noted additional drivers of community involvement:

- Six interviewees cited community demand as a driver.
- Six interviewees cited environmental justice, including helping disadvantaged and tribal areas.
- Two interviewees cited EPA initiatives and priorities, such as the Targeted Brownfields Assessment (TBA) program and region-specific priorities.
- Two regional contacts cited benefits to EPA of providing technical assistance and information dissemination as an additional driver. Specifically, one regional contact indicated that long-term stewardship at cleanup sites requires pro-active community and civic involvement. Another region said: "If the region postpones adequate community engagement, it will receive complaint letters and will establish a lack of trust" that can inhibit cleanup and redevelopment.

[14] I *Community Involvement Plans*, p. 7, available at: http://www.epa.gov/superfund/community/pdfs/toolkit/ciplans.pdf. NCP [40 CFR 300.430(2)(ii)] states the following intent regarding community involvement: "(A) Ensure the public appropriate opportunities for involvement in a wide variety of site-related decisions, including site analysis and characterization, alternatives analysis, and selection of remedy; and (B) Determine, based on community interviews, appropriate activities to ensure such public involvement."

QUESTION 2: WHAT IS THE BASELINE OF CURRENT OSWER TECHNICAL ASSISTANCE AND INFORMATION DISSEMINATION ACTIVITIES WITH RESPECT TO:

a. Frequency of practice and program-to program variability?

b. Proportion of communities that receive formal assistance through TAG, TASC, or TAB?

c. Selection criteria and on-the-ground process for accessing TAG and TASC (for Superfund and RCRA CA only)?

d. Community assistance that is provided outside of formal programs (including helping to set up CAGs and providing ad-hoc assistance)?

e. Areas of unmet TA or ID need?

Summary of Methods to Address Question 2

- Interviews with HQ and regional OSWER staff in all three cleanup programs
- Interviews with six delegated RCRA CA states
- Interviews with TAB grantees
- Review of data and documents provided by OSWER
- Review of publicly available information

Findings on Frequency of Practice and Program-to-Program Variability

OSWER administers three formal programs to provide TA to communities affected by contaminated sites: TAG, TASC, and TAB. As shown in Exhibit 3-1 below, Superfund communities are eligible for TAG, and Brownfields communities can access TAB, and all OSWER communities are eligible for TASC.[15]

Superfund

The Superfund program has the most extensive formal TA and ID practices of the OSWER programs. Most notably, the Superfund awards TAG grants to community-based organizations at eligible Superfund sites. Groups awarded TAGs up to $50,000 can contract with independent technical advisors to interpret and explain technical information to the community. 350 TAGs have been awarded since their inception in 1988. Superfund communities are also eligible for TASC assistance, with 56 Superfund communities receiving TASC assistance since the program's inception in 2008.

[15] Although all OSWER communities are eligible for TASC, IEc notes confusion within EPA about whether RCRA CA sites in particular are eligible for TASC funding if there is no link to Superfund. RCRA CA staff members in EPA regions are confused about this issue. For example, according to one interviewee, one region submitted several RCRA CA sites to EPA HQ for TASC funding, but all were declined because they had no link to Superfund. The disconnect may be that the RCRA CA program needs to contribute funds to TASC in order to use the contract, which may be a limitation precluding wider use by RCRA CA sites.

Exhibit 3-1. Eligiblity and Basic Setup of OSWER TA Programs

PROGRAM	ELIGIBILITY	BASIC SETUP
TAG (Since 1988)	Superfund	Community groups apply for grant from EPA. Community groups hire their own advisor to provide technical assistance.
TASC (Since 2008)	All OSWER programs	OSWER maintains a contract with a firm that provides CI to community groups. Community groups access the contract by contacting their region or the region recommends communities to HQ directly.
TAB (Since 2008)	Brownfields	OBLR maintains a long-term grant with four organizations that provide CI to community groups. Community groups access the contract by contacting the TAB grantee for their region.

Furthermore, the Superfund program employs 80 Community Involvement Coordinators (CICs), with between two and 10 CICs in each region. CICs provide a liaison between project managers and the community, and provide opportunities for two-way communication throughout the life of a project. Every Superfund site is also required to produce a CIP at the beginning of the Superfund process to identify how to best engage the community throughout the cleanup. CIPs are discussed in more detail under Question 3.

In contrast to Superfund, which administers technical assistance directly to community groups, assistance to community groups is delegated under the RCRA CA and Brownfields programs as discussed below.

Brownfields

Brownfields community groups can receive technical assistance from the TAB grantee assigned to their region. EPA has awarded TAB grants to the New Jersey Institute of Technology for Regions 1, 2, and 3; Enterprise Corporation of the Delta, Inc. for Regions 4 and 6; Kansas State University for Regions 5 and 7; and the Center for Creative Land Recycling for Regions 8, 9, and 10. 833 Brownfields communities have received assistance through TAB, with assistance lasting anywhere from a five minute phone call to a multiple-year relationship. The TAB grantees assist communities with: community outreach and mediation; grant writing; environmental planning; training; regulatory facilitation; identifying funding sources; technical presentations; summarizing stakeholder comments and concerns; technical reports; and site inventories.

However, most technical assistance in Brownfields is not provided through TAB, but by the recipients of Brownfields grants, which are typically local governments. As discussed under Question 1, Brownfields cleanup grantees are required to provide technical assistance. Moreover, OBLR awards points for community engagement plans as part of evaluating most types of grant applications, including Assessment Grants, Cleanup Grants, Multi-Purpose Pilot Grants, and Revolving Loan Funds Grants. Once the grants are awarded, EPA does not directly track community engagement activities by Brownfields grantees, but community engagement is part of grant reporting.

RCRA CA

RCRA CA has standard guidelines for engaging the community in its 1996 *Guide to Public Participation.* However, requirements for TA or ID under the RCRA CA program are limited. Under RCRA CA, EPA or the delegated state agency is required by statute to issue a public notice in the newspaper and hold a period of public comment when key project milestones are reached, such as the proposed remedy and final remedy decision. All regional and state staff interviewed indicated that they comply with these ID requirements.

RCRA CA sites are eligible for TASC assistance. Seven RCRA CA sites have received TASC assistance since 2008. Most TA and ID activities within RCRA CA are conducted by RCRA CA regional and/or state staff on a site-by-site basis based on perceived need. Every region and state interviewed holds public meetings, but only at select sites with high levels of community interest. It should be noted that the number of RCRA CA community groups receiving TA is not tracked centrally for either EPA or state sites.

Some states have developed TA approaches for select RCRA CA sites. For example, Mississippi's RCRA CA program has an EJ coordinator who provides training to staff to identify EJ communities within the RCRA CA universe, conduct face-to-face community meetings, and use an electronic notification system for RCRA CA communities within the state. South Carolina's RCRA CA program staff report that they meet with RCRA CA facility staff early in the process to encourage them to engage with the community; South Carolina staff noted that facilities can be persuaded that community engagement will help to build trust.

Findings on Proportion of Communities that Receive Formal Assistance through TAG, TASC, or TAB

Superfund

Superfund communities are eligible for formal technical assistance through both TAG and TASC. Of the total universe of 13,662 Superfund sites (1652 NPL sites and 12,010 non-NPL sites), 350 TAGs have been awarded. Thus, approximately 2.6 percent of Superfund sites have had a TAG group. As shown in Exhibit 3-2 below, 56 Superfund communities had received TASC assistance since 2008, or just 0.4 percent of all Superfund sites. It should be noted that the TAG program has been available since 1988, whereas the TASC contract became available much latter, in 2008.

RCRA CA

Formal TA is rarely used at RCRA CA sites. Seven RCRA CA communities have received TASC assistance since 2008. The RCRA CA universe contains 3,747 sites, so just a tiny fraction of RCRA CA communities have received TASC assistance. The breakdown of the authority types of these 3,747 sites is shown below in Exhibit 3-3.

Exhibit 3-2. TASC Assistance by Program

PROGRAM	TASC COMMUNITY COUNT (CURRENT AS OF JANUARY 2013)
Superfund	56
NPL	*37*
Non-NPL	*14*
Federal Facility	*5*
OEJ	29
RCRA CA	7
CARE	6
Historically Black Colleges and Universities	6
OW	1
TOTAL	**105**

Exhibit 3-3. Authority Type of RCRA CA Sites

RCRA CA FACILITY AUTHORITY	RCRA CA SITE INVENTORY (FROM RCRA INFO MAY 2013)
Total facilities in need of corrective action	3747
Under EPA authority only	1485
Under state authority only	1174
Under EPA authority and under state authority at different times	808
Under state authority, and under joint EPA/state authority, at different times	37
Under joint EPA/state authorities only	31
Under EPA authority, state authority, and joint authorities at different times	13
Sites for which authority information is not available in RCRA Info	*186*
Uncategorized	13

Brownfields

833 communities have received TAB assistance from one of the four TAB grantees since 2008. However, there is no official list of brownfields in the U.S., since most U.S. communities have brownfields sites, and EPA considers all communities to be eligible for Brownfields grant assistance. Thus, it is not possible to determine the proportion of communities with brownfields that have received TAB assistance.

Findings on the Selection Criteria and on-the-Ground process for Accessing TAG and TASC

TAG

Communities typically learn about the availability of TAGs through site Remedial Project Managers (RPMs) and CICs at public meetings and/or through e-mail and standard mail distributions. EPA also distributes fact sheets regarding TAG and has information about TAG on the EPA website.

Once a community group applies for a TAG, EPA conducts an Eligibility and Organizational Capability Review to determine whether the applicant meets all the basic requirements of administering a TAG. These requirements include:

- The applicant must contain groups of individuals that may be affected by a release or threatened release at a Superfund site;
- The applicant cannot be a Potentially Responsible Party (PRP), academic institution, or political subdivision; and
- The applicant must have the organizational capability to administer the TAG.

Our interviews with Superfund regional staff indicated that TAGs are almost always awarded to groups that meet these eligibility requirements. Resource constraints are rare; only one region reported cutting TAG funds to due resource constraints. Two regions stated that some communities do not apply for TAG because the paperwork required to administer the EPA grant is too burdensome.

In some instances, more than one group applies for a TAG at a single site. This situation occurs at less than 10 percent of the sites according to HQ. In these instances, EPA conducts a Programmatic Criteria Evaluation to decide between applicants. This review consists of determining the extent to which the TAG group: represents the community; plans to use a technical advisor throughout the response; plans to communicate with the broader community; and identifies potential environmental results that can be measured.

TASC

Community groups do not apply to TASC directly; they receive access to the TASC contract based on recommendations from regional staff to EPA HQ. Once EPA notifies a community that it has been selected for TASC, the community writes an informal letter or e-mail to their EPA region stating they are interested in funding. Since communities do not apply for TASC directly, we heard from six RCRA CA regions that they do not inform any community members about TASC services. However, all 10 Superfund

regions and four RCRA stated that communities may hear about TASC through project managers, CICs, the EPA website, and/or fact sheets.

HQ and regional interviewees within the Superfund and RCRA CA programs stated that there are no formal selection criteria for OSWER programs to access TASC. However, communities that are selected for TASC funds typically share one or more of the following conditions:

- A lack of other sources of funding for community TA needs;
- A high level of community interest in the cleanup process;
- Environmental justice concerns;
- Short-term technical assistance needs; and/or
- Superfund communities that are not interested in forming a TAG group.

Based on interviewee opinions, there appears to be adequate TASC funding for Superfund sites, but not for RCRA CA sites. Superfund HQ and eight of ten regions interviewed stated that there is no lack of TASC funds to support the number of communities recommended to receive funding. The two Superfund regions that reported a lack of TASC funds pointed to examples of certain communities that did not receive as much funding as the region had requested. In contrast, four RCRA CA regions and HQ stated that RCRA CA sites were unable to get TASC funds for sites unless they had a link to Superfund, and as noted above, only seven RCRA CA sites have accessed TASC.

Findings on Community Assistance Provided Outside of Formal Programs

Superfund

All ten Superfund regions interviewed stated that technical assistance to communities is provided outside of formal programs. The most common response among regions (eight out of 10 interviewed) was that RPMs and CICs are available to provide community members with ongoing technical assistance as needs arise. In addition, four regions mentioned holding special public meetings with communities as needed.

Brownfields

As discussed above, the majority of TA and ID to communities in the Brownfields program is provided outside of TAB by cleanup grant recipients. For Brownfields cleanup grants, the grantee must undertake the following steps to ensure the community is informed and involved in the cleanup process:

- Designate a community relations spokesperson.
- Prepare a draft Community Relations Plan and submit to EPA to review prior to the 'Analysis of Brownfield Cleanup Alternatives' is complete.
    - The Community Relations Plan must outline steps to "provide reasonable notice of proposed cleanup, opportunity for involvement,

response to comments, and administrative records that are available to the public."

- Establish an information repository and maintain an administrative record for the site.[16]

RCRA CA

As discussed previously, only seven RCRA CA sites have received TASC assistance, which is the only formal TA program available to RCRA CA communities. Thus, nearly all TA provided to RCRA CA communities has been outside of formal programs. EPA regions and delegated states that administer RCRA CA make decisions on where to offer targeted TA based on community requests and staff assessments of need.

The most common form of technical assistance reported is holding special or regular public meetings, which was mentioned by nearly all states and regions interviewed. In addition, all six states interviewed and four regions mentioned that they post site information online for high profile sites. Other forms of technical assistance provided by RCRA CA staff include workshops, programs for EJ communities, and encouraging PRPs to engage the community. As noted above, one delegated state reports that encouraging facilities to engage the community early in the RCRA CA process will help build trust and facilitate community engagement throughout the lifetime of the project. Other methods of distributing information to RCRA CA communities mentioned by interviewees include newsletters, surveys, fact sheets, and social media.

Findings on Unmet TA or ID Needs

Most interviewees were able to identify some unmet TA and/or ID needs. However, as shown in Exhibit 3-4 below, when asked to characterize unmet needs in their region, RCRA CA interviewees noted a somewhat higher incidence of unmet needs among RCRA CA communities than among Superfund or Brownfields communities.

Exhibit 3-4. Unmet ID and TA needs

	NOTED UNMET TA NEEDS	NOTED UNMET ID NEEDS
RCRA CA	HQ, 8 Regions	7 Regions
Superfund	HQ, 6 Regions	7 Regions
Brownfields	HQ, 4 Regions	5 Regions

Superfund

Four regions reported that there are no identifiable unmet TA needs within Superfund. The most common cause of perceived TA gaps identified by Superfund regions are a lack of resources and staff (two of 10 regions) and that TAGs are too labor intensive to administer (two of 10 regions). Other issues with TA noted by Superfund regions include that more regions should be pursuing Technical Assistance Plans, which require PRPs to provide TA; and that communities are pressuring HQ directly, instead of their own

[16] These steps are documented in the *EPA Brownfields Cleanup Grant Checklist: Major Programmatic Tasks*. However, Brownfields contacts did speak to the extent of implementation during interviews for this evaluation.

regions, to access TA. Notably, Superfund HQ contacts did not mention any resource limitations affecting TA and ID within the program.

Three Superfund regions reported there are no identifiable gaps in Superfund's approach to ID. The most common issues identified with regard to Superfund's approach to ID are that tailored outreach activities and electronic records work better than traditional public notices (two regions and HQ); only vocal communities receive adequate attention (two regions); and there are too few resources for ID (two regions). Individual regions also stated that EPA falls short of delivering high quality information to English-as-a-Second-Language (ESL) communities and immigrant communities, and that CIPs should include references to TA options available to communities.

Brownfields

Most Brownfields interviewees suggested that there are no gaps in Brownfields' approach to TA (six regions) and ID (five regions and HQ). Four Brownfields regions and HQ indicated that any perceived gaps in TA are the result of resource limitations. Three regions stated that Brownfields' approach to ID falls short of reaching rural communities and/or communities that have not won grants. One region reported that the staff members that manage the cooperative agreements lack knowledge, while another stated that it is too difficult to post pertinent information for communities to EPA's website.

RCRA CA

RCRA CA interviewees noted a lack of resources to conduct TA and ID as a cause of perceived gaps more frequently than either of the other two cleanup programs. Eight of 10 RCRA CA regions and HQ contacts stated that a lack of resources is the cause of unmet TA needs in the program, while six of 10 regions reported resource limitations as a gap in RCRA CA's approach to ID.

Other areas of concern identified by RCRA CA interviewees included a lack of staff training in community engagement, and that traditional forums such as public meetings are not as effective as going to community-sponsored events, like fairs and celebrations.

QUESTION 3: HOW CAN SUPERFUND COMMUNITY INVOLVEMENT PLANS (CIPS) BE USED TO IMPROVE TECHNICAL ASSISTANCE AND DELIVERY OF INFO?

This question had a number of sub-questions:

- Does every site have a CIP?
- What information is available on the implementation of CIPs?
- Are CIPs revised over time?
- Do CIPs, as they are currently used, ensure effective technical assistance and information delivery throughout the life of the project? Why or why not?

Summary of Methods to Address Question 3

- Interviews with 10 Superfund regional staff

Findings on CIP Implementation

As noted above under Question 1, all Superfund sites have a CIP. According to all Superfund regional interviewees, CIPS are tracked and maintained by regional staff. CIP updates are variable. From the perspective of tenured EPA staff, CIPs are most valuable at the beginning of the Superfund process. From the perspective of community members and new EPA staff, CIPs and updates have value throughout the cleanup process. CIPs may be improved by more frequent, targeted revisions and by making them more readable by community members. CIP implementation is a broad topic that encompasses the other two sub-questions; thus, more information on implementation is in the sections below.

Finding on CIP Revisions

EPA's official CIP guidance says that documents should be updated as needed:

> *"The NCP requires that the CIP be reviewed prior to the initiation of the remedial design to determine whether it should be revised to describe further public involvement activities. Yet, there is no standard rule about when to update or completely revise the CIP. Because the CIP should be a living document that is referred to regularly, it makes sense that information will be continuously added or updated."*[17]

However, there appears to be confusion about the CIP guidance and the recommended revision schedule among Superfund regional contacts. Only two interviewees referred to the guidance when asked about CIP revision frequency, and they both mistakely indicated that the guidance contained a specific time frame for CIP revisions. One region said updates are prescribed every two years by the guidance, while another said every five years.

The reality is that average revision frequencies for CIPs vary widely from site to site; interviewees indicated that revisions occur once per year for some sites to once every five to seven years for others. Major impetuses for revision include community demand and project milestones. Five interviewees said revisions occur "as needed." Of these five interviewees, three interviewees cited significant milestones or phase changes of the cleanup process as impetuses for CIP revisions. Five interviewees said that revisions occur too infrequently; three of these contacts indicated that revisions only occur in response to community demand.

Findings on CIPs as a Tool to Ensure Effective Technical Assitance and Information Dissemination

Six of 10 interviewees said that CIPs are *not* an important tool for ongoing technical assistance and information delivery. The general sentiment among Superfund regional interviewees is that CIPs are helpful to organize community engagement at the beginning of the Superfund process, but are not used by EPA staff as a resource over time. EPA tends to set aside the document after the start of the project, instead relying on ad-hoc communication with community members.

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[17] *Community Involvement Plans*, p. 7, available at: http://www.epa.gov/superfund/community/pdfs/toolkit/ciplans.pdf

CIP updates often lag behind project changes. Thus, CIPs may not ensure effective technical assistance and information delivery throughout the life of the project given lagging updates. However, as discussed under Evaluation Question 4 findings, satisfaction with technical assistance and information dissemination is high among Superfund community contacts participating in this evaluation that have received a TAG, and across the Superfund community contacts that have used the TASC contract.

CIPS appear to be important for other reasons, including gathering community contact information; providing an ongoing reference tool for community members; and serving as training materials for new Superfund staff.

Superfund regional contacts provided several suggestions for improving CIPs. Many interviewees suggested format changes including:

- Two interviewees suggested that CIPs be shortened, or that updates be placed into an addendum.
- Two interviewees suggested making CIPs easier to read, perhaps by using fact sheet summaries.
- One interviewee noted that CIPs have not kept up with changing communication methods and social media; the format of the CIPs as stand-alone documents could be reconsidered with social media in mind.

Two interviewees recommended more regular updates. However, one interviewee cautioned against "obsessive" updates, pointing out that only certain parts of CIPs need updating over time.

QUESTION 4: WHAT IS THE BASELINE OF CUSTOMER SATISFACTION WITH OSWER TECHNICAL ASSISTANCE AND INFORMATION DISSEMINATION ACTIVITIES?

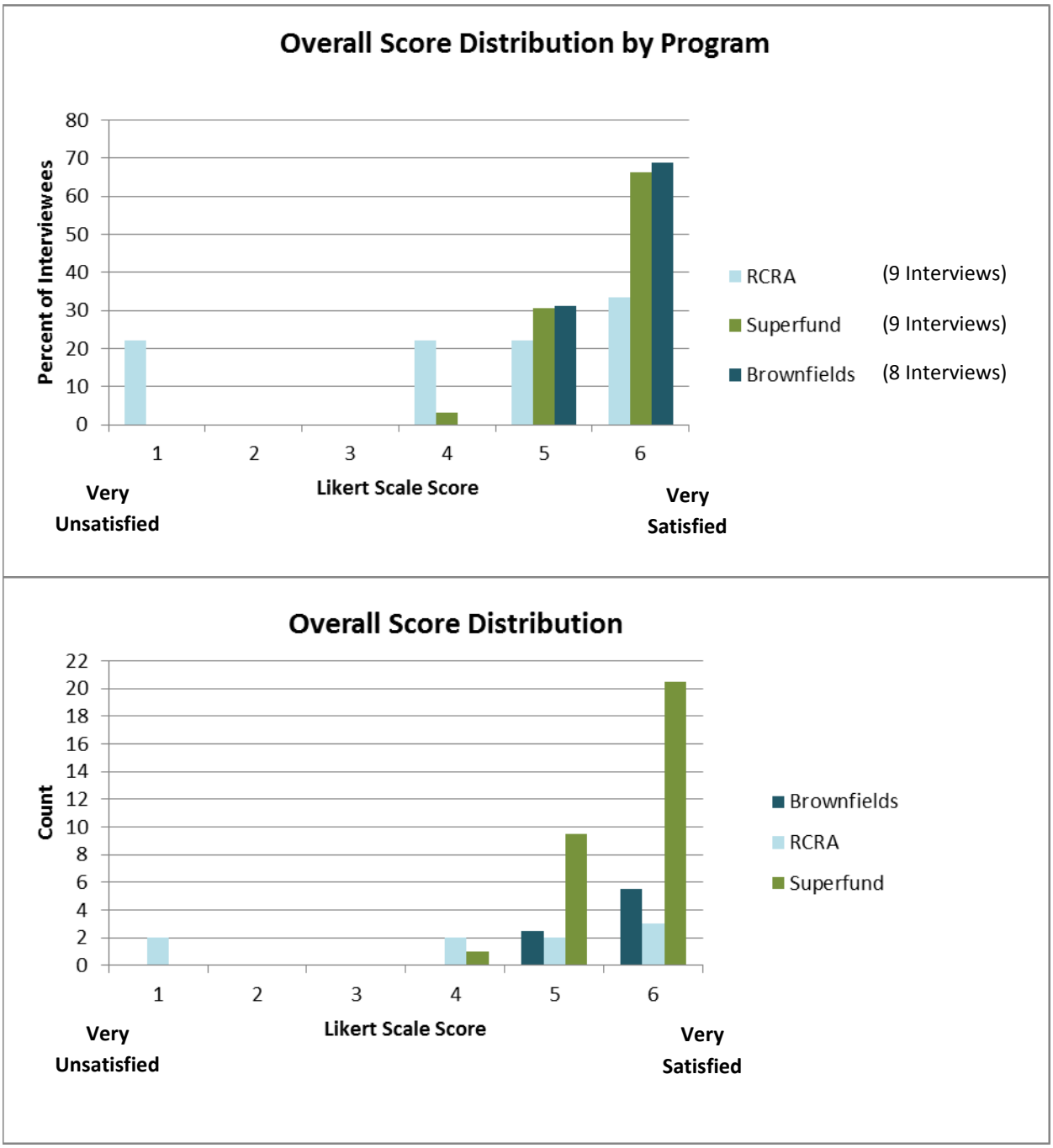
Summary of Methods to Address Question 4

- Satisfaction interviews with community contacts (see summary table Exhibit 2-2 in the Methods chapter).

Findings on Interviewee Satisfaction

Interviewees rated their overall satisfaction with assistance services provided on a scale of one to six; with a score of one being very dissatisfied to a score of 6 being very satisfied (see satisfaction interview guide in the methodology in Appendix A). As shown in Exhibit 3-5 below, interviewees noted consistently high satisfaction overall scores for Superfund and Brownfields programs, while scores for RCRA CA were more mixed. However, regarding RCRA CA, it should be noted that at the lower end, only two interviews rated their overall satisfaction as a "1" with assistance provided by RCRA CA states (see bottom graph in Exhibit 3-5); the majority of RCRA CA sites provided favorable overall ratings for assistance received.

Exhibit 3-5. Satisfaction Score Summary



Illustrative interviewee elaborations on overall satisfaction scores are provided in Exhibit 3-6 below.

Exhibit 3-6. Satisfaction Ratings Explanations from Interviewees

Summary of Score "6" Elaborations	• Excellent service that goes above and beyond requirements • High level of expertise • Excellent record of interfacing with the community often and in plain language • Affords community a high degree of influence over events at the site • Has helped community secure grants • Displays ability to work effectively with all parties: community, state, Responsible Party (RP), EPA
Summary of Score "5" Elaborations	• Generally high quality service • Good communication; solid expertise conveyed in plain language • Should reach out to community more often • Would be rated 6, but community hasn't worked long enough with them
Summary of Score "4" Elaborations	• Outreach is passive; delegated RCRA CA only provides information to citizens that ask for it • RCRA CA does not help citizens tackle short term issues (e.g., declining home equity), instead focusing on the decades-long cleanup
Summary of Score "1" Elaborations	• Too much control is put in the hands of the RP • EPA (RCRA CA staff) is not straightforward about administrative issues, and claim to have inadequate manpower to tackle problems • Delegated RCRA CA state agency doesn't listen to relevant parties: not the other state agencies, not the community, and not EPA

IEc compared overall satisfaction ratings for TAG and TASC among Superfund community contacts and found remarkably similar overall levels of satisfaction with these two mechanisms for providing assistance, as shown in Exhibit 3-7 below.

Findings on Interviewee Suggestions For Improving Services

Community contact suggestions common to all three programs include making outreach materials more accessible by using visual aids and plainer language, and reaching out to community members more often and/or more actively. Additional suggestions include: bolstering technical expertise of advisors, improving EPA's website, and assisting with EPA grant processes.

Exhibit 3-7. Comparison of Overall Satisfaction Scores for TAG and TASC

STATISTIC	TAG	TASC
Median	6	5.7
Mean	5.8	5.5
Minimum	5	4
Maximum	6	6

Superfund

Most Superfund community interviewees stated that technical advisors did not need to make improvements. The small number of suggestions provided by interviewees on improving technical assistance by providers include: using more visual aids during presentations; developing a more local presence; and bolstering expertise on wildlife impact issues. All of these suggestions were mentioned by only one individual. Interviewees had more suggestions for EPA to improve on community outreach:

- Reach out to communities more often (3 respondents).
- Create a more transparent decision-making process (2 respondents).
- Acquire more contamination science expertise for residents to access (1 respondent).
- Avoid giving residents unrealistic expectations (1 respondent).

Brownfields

Two Brownfields interviewees said their advisors did not need any improvement. Other interviewees provided suggestions on how how Brownfields technical advisors could improve their services:

- Engage the community more deeply. Use them as a resource to discover site histories (2 respondents).
- Assist with grant applications (2 respondents).
- Draft higher quality reports and visuals (1 respondent).

Brownfields community contacts also had suggestions for EPA on improving community outreach:

- Improve Brownfields website search-ability and update schedule (2 respondents).
- Simplify the grant process (2 respondents).
- Increase project officers' level of technical expertise (1 respondent).
- Distribute more success stories and metrics (1 respondent).

RCRA CA

Three RCRA CA community interviews had no suggestions for technical advisor improvements; others provided the following input:

- Communicate in plainer language (3 interviewees).
- Distribute outreach more promptly, frequently, or actively (3 interviewees).
- Spend more time listening to community needs, including shorter term issues like declining property values (1 interviewee).

Most RCRA CA satisfaction interviewees had no experience working with EPA, and did not offer suggestions for EPA regarding community outreach.

QUESTION 5: WHAT MEASURES CAN BE USED TO ASSESS THE EFFECTIVENESS AND TANGIBLE OUTCOMES OF OSWER TECHNICAL ASSISTANCE AND INFORMATION DISSEMINATION ACTIVITIES ACROSS THE LIFECYCLE OF SITE PLANNING, REMEDIATION, AND REUSE?

QUESTION 6: HOW CAN THESE MEASURES BE USED TO IMPROVE OSWER TECHNICAL ASSISTANCE AND INFORMATION DISSEMINATION ACTIVITIES?

Summary of Methods to Address Questions 5 and 6:

- Reviewed CEI logic models and related program materials.
- Reviewed *Guidelines for Measuring the Performance of EPA Partnership Programs*, developed by the National Center for Environmental Innovation, dated June 2006.
- Reviewed the Partnerships for Environmental Public Health *Evaluation Metrics* Manual, dated October 18, 2010.
- Reviewed the types of measures currently used by OSWER programs and other EPA community-based programs related to community involvement.
- Conducted interviews with Superfund, Brownfields, and RCRA CA HQ and regional staff; included interview questions on potential measures.
- Considered feasibility factors for metrics implementation.

Interview Findings of Relevance for Developing Measures

IEc asked HQ and regional program staff from each program what constitutes successful TA and/or ID, as a starting point to thinking about meaures. The most frequent response was that successful engagement consists of tailoring materials to meet community needs and/or to ensure the community is satisfied with the information provided; 12 of 30 regional interviews (four from each program) provided this response. Other respones were far less frequent. Three Superfund interviewees equated unbiased TA with successful TA. IEc's interpretation of this response, based on other feedback provided by

Superfund interviewees on TAG, is that some regional saff are concerned that technical advisors hired under TAG are biased towards providing information that their clients (community groups) want to hear, rather than providing unbiased information. Three Brownfields interviewees indicated that successfull TA is tied to successful project outcomes.

IEc also asked HQ and regional contacts about current metrics used to track community engagement for each program. We learned that in some regions, Superfund staff track output metrics, but not outcome metrics. Examples of output metrics tracked by some Superfund rgions include : funding spent, number of public notices, number of meetings, number of TASCs, number of CAGs, number of TAGs, number of people on mailing lists, number of meeting attendees, amount of media coverage, requests received for TA. Only two RCRA CA regions reported tracking output metrics: one regional tracks the number of sites that they have designated as high profile sites, but does not store these data post-remediation. The other region tracks the engagement tools that are used and how often they are used. According to our interviewees, the Brownfields program does not track community involvement metrics, but some interviewees referred IEc to site-level success stories generated by HQ, some of which have information on communit involvement. Finally, as noted previously in this report, EPA's TASC contractor Skeo tracks customer satisfaction at sites that have used the TASC contract.

Finally, IEc asked interviewees "What other metrics might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?" Responses are as follows:

- Most Brownfields interviewees (seven of 10 Regions and HQ) do not believe any new metrics should be created. The other three Brownfields regions suggested closely tracking specific resources used at individual sites.
- Measuring customer satisfaction was the most common response from RCRA CA and Superfund interviewees. Four Superfund regions suggested satisfaction surveys for TAGs, similar to those conducted by Skeo for TASC. Four RCRA CA regions also suggested satisfaction interviews.
- Four regional interviewees (1 from Superfund, 2 brom Brownfields, and 1 from RCRA CA) said that one metric to gage the success of TA/ID is to count the frequency of complaints filed by community groups.
- One Superfund regional contact and one RCRA CA regional contact suggested measuring community member learning from assistance received.
- One Superfund regional contact suggested an efficiency metric by comparing resources spent to satisfaction rates. Similarly, one Brownfields regional contact suggested comparing resources spent to project outcomes.

Approach to Developing Menu of Potential Measures

IEc considered the following types of measures for inclusion in a menu of potential measures for OSWER to use to track progress on TA and ID moving forward:

Output measures:

- Measures of unmet demand for CI services
- Conventional output measures for CI work: numbers of meetings, engagements, et cetera (variations on measures currently used by some Superfund regions)
- Output measures for ID, such as frequency of community notices
- Measures of EPA training

Outcome measures:

- Measures of community satisfaction
- Measures of EPA use of best practices

We developed this universe of potential types of measures based on:

- Close review of the CEI logic models and theory of change
- Existing community involvement measures used by OSWER programs
- Review of the types of measures currently used by OSWER programs and other EPA community-based programs related to community involvement
- References in applicable metrics manuals and literature reviewed

We then narrowed down the types of measures to include in a menu based on:

- Feasibility factors including:
    - The ability to define objective measure(s)
    - The need to develop and implement new information collection infrastructure
- Feedback from interviewees on potential measures (discussed above)
- IEc's professional judgment regarding the likelihood of the measure being accepted and successfully implemented by the OSWER programs

Menu of Potential Measures

IEc developed menus of potential measures for outputs, short-term outcomes, and long-term outcomes discussed below. It is important to note that these are menus from which to select measures; we do not recommend adopting all of these measures.

Output Measures

The output menu is presented in Exhibit 3-8 below.

Exhibit 3-8. IEc Recommendations for a Menu of Potential Output Measures

1. Proportion of Superfund communities that applied for TAG assistance, but have not received assistance
2. Proportion of Brownfields communities that requested TAB or other form of K6 assistance, but have not received assistance
3. Proportion of Superfund and RCRA CA communities that were recommended by a region for TASC assistance, but have not received assistance
4. Proportion of RCRA CA communities that have asked a state or region for any form of assistance, but have not received assistance
5. Number/Percent of RCRA CA communities that have received TA
6. Number/Percent EPA Regions that have offered TA/ID training in the past year

IEc's rationale for these output measures is as follows:

The first four measures address unmet needs. Several regions identified assigning resources where they are needed as successful aspect of TA. Brownfields and RCRA CA interview contacts also frequently identified a lack of funding as an impediment to TA. Thus, the proportion of communities that have either applied for, or been identified by regional staff, as needing technical assistance will give EPA management an idea of how much additional resources are needed and where they are needed . Note that IEc did not frame the measures as "proportion of communities that are known to have unmet needs" because "unmet needs" is not measurable language. We included a specific measure on RCRA CA communities receiving TA (#5) because this is where the gap seems greatest. Thus, it would be reasonable for EPA to focus additional output measures on RCRA CA in particular. Finally, some interviewees indicated that more training would be helpful in delivering quality TA, which led to the development of #6 on frequency of training.

IEc does not suggest any output measures for information dissemination. Based on our interview data , it appears that required ID, such as CIPs and public notices for RCRA CA are already widely implemented. Since ID should be tailored to community needs, there is no single measure that can be universally applied to all sites because sites do not apply for ID in and of itself.

Many regional contacts across the three OSWER programs advised against any additional tracking of conventional output measures such as number of meetings, number of attendees, number of public notices, et cetera. These metrics are already tracked by Superfund in some regions, but contacts indicate they cannot be used to improve TA and/or ID activities. We agree with this conclusion, and do not recommend additional tracking of these types of "bean counting" measures.

Short-term Outcomes

Based on the criteria stated above, IEc has not identified many options for a short-term outcomes measure for the CEI. The one measure that we recommend EPA consider is presented below in Exhibit 3-9.

Exhibit 3-9.IEc Recommendation for Potential Short-Term Outcome Measures

1. The number/proportion of community members filing complaints related to the provision of TA with Superfund/Brownfields/RCRA CA regional staff annually.

Several regional interviewees indicated that tracking trends in complaints is a viable approach to measuring program success, and some regional staff currently track complaints informally. If EPA works to continually improve the overall quality and availability of TA, complaints should decrease over time. However, tracking complaints may pose challenges. For example, EPA would have to develop guidance to define the boundaries of a community member complaint about TA (in contrast to complaints about other remediation or redevelopment issues), and regions would need to be very careful about coding complaints. EPA may also need to develop or augment a data collection system to track this measure, in particular for RCRA CA, which has the complication of state delegation in most states, and does not have an existing data collection infrastructure for tracking assistance provide to communities. A limitation of this measure is that it would not account for those who are dissatisfied but do not file a complaint.

Theoretically, EPA's utilization of best practices would be a superior short-term measure of success of the CEI program compared to tracking complaints. However, we cannot recommend tracking the use of best practices because: best practices would need to be rigorously analyzed and defined prior to tracking, and EPA has learned from experience that this first step can be quite difficult; tracking of best practices is not in place for any of the three OSWER programs; and the data collection approach required to build and administer a system for tracking use of best practices would be more complex than for other measures.

Long-term Outcomes

The long-term outcome menu is presented in Exhibit 3-9 below.

Exhibit 3-10.IEc Recommendations for a Menu of Potential Long-Term Outcome Measures

1. Proportion of TAG/TASC/TAB communities that have received a community satisfaction survey that are "satisfied" with the information provided by EPA throughout the cleanup process *(tracked individually for each program).*
2. Proportion of TAGs/TASC/TAB/RCRA CA communities that have received a community satisfaction survey that are "satisfied" with the assistance provided by their technical advisor *(tracked individually for each program).*

Throughout the interview process, IEc heard consistent support for satisfaction surveying, and we think it is the best approach for understanding the long-term success of TA provided under the CEI. EPA could adopt both of these measures, or could choose to adopt only the second measure that focuses on satisfaction with TA provided (as opposed to information provided by EPA). We would recommend that each community that receives formal technical assistance be provided with a satisfaction survey. With the exception of RCRA CA, we do not recommend surveing individuals from communities that received only informal assistance, as it will be difficult to identify an appropriate individual(s) to be surveyed (this was a key problem for IEc in conducting this evaluation, as discussed previously).

Skeo Solutions has already developed a community satisfaction format for TASC which asks communities to rank various components of technical assistance, which IEc used for conducting satisfaction surveys with TAG recipients. We would suggest revising Skeo's format slightly moving forward to ensure every number on the scale has an associated value. Currently, the 1 to 6 scale implemented by Skeo only defines 1 as "not at all satisfied" and 6 as "very satisfied." Using this scale, we would interpret a score of 4 or more to be "satisfied" but it would be preferable to define each rating for the community member taking the survey.

Furthermore, we suggest that Skeo discontinue its practice of interviewing community contacts and EPA contacts about satisfaction within the same interview; community contacts should be interviewed separately from EPA contacts, and have their scores tracked seperately. However, we encourage more use of Skeo's practice of interviewing multiple contacts for each community, as this provides a diversity of viewpoints.

EPA could also include questions to probe on community member learning within community satisfaction surveys. However, we do not think that measuring community member learning is a substitute for measuring satisfaction. Moreover, while community contacts can easily and accurately report their level of satisfaction, self-reported data on learning may suffer from biases, and it is not feasible in this context to admister surveys that objectively probe knowledge gained by community members through the TA process.

Finally, as noted above, EPA would need to develop new data infrastructure to track assistance provided to RCRA CA communities, and work with states to implement a reporting system. Again, this is because the vast majority of assistance given to RCRA CA communities is not provided under the auspices of a formal program, and TA is typically administered by state agencies not EPA.

APPENDIX A: INTERVIEW GUIDES

IEc proposes to conduct interviews with the following individuals as the main source of new data collection for the evaluation:

1. Superfund HQ contacts and contractor Skeo (2-3 interviews)
2. Superfund Regional contacts (10 interviews)
3. RCRA CA HQ contacts (2 interviews)
4. RCRA CA Regional contacts (10interviews)
5. RCRA CA state contacts (6 interviews)
6. Brownfields HQ contacts (2 interviews)
7. Brownfields Regional contacts (10 interviews)
8. TAB Grantees (4 interviews)
9. CPRC (1 interview)
10. Community satisfaction interviews
    a. Superfund (10 interviews with TAG grant recipients)
    b. RCRA CA (12-15 interviews, including 2-3 sites where the EPA Region conducted community engagement instead of the state)
    c. Brownfields TAB and K6 grants (the majority of interviews will be conducted with communities that have received assistance through TAB program; we will also interview any community that has received TA through K6, but our current understanding is that there may be only one or two applicable K6 grants)

IEc will conduct all interviews by phone. We will make initial contact through an introductory email to explain the evaluation, provide the relevant interview guide, and suggest dates and times for an interview.

The initial email should also address confidentiality issues. We suggest sharing all names of interviewees with EPA, but not publishing names and positions in the final report. More importantly, we suggest reporting results in aggregate; for example, the final report may say that "X# of six EPA Regional RCRA CA interviewees identified instances where community TA needs went unmet." We suggest not attributing statements to individual interviewees without prior consent. This confidentiality approach will increase the likelihood of interviewee candor.

IEc developed a series of interview guides to ensure consistency in conducting interviews; these guides appear starting on the following page. Within the context of those guides, we may depart from the written script during interviews as appropriate to obtain additional detail or clarification, or follow up on a topic raised by the interviewee. The interview guides in this appendix indicate the evaluation question(s) addressed by each interview question; we will delete this text in the version of the guides provided to interviewees.

IEc will commence analysis of information collected during interviews once interviews are complete. IEc may code interview responses and/or conduct a thematic analysis of interview responses. Our analysis will focus on identifying trends, such as areas of consensus or sharp disagreement between interviewees. We will look for such trends both within and between interviewee categories, with a particular view to differences between EPA staff and individuals outside the agency. We will also highlight any areas in which interviewee responses diverged significantly from our expectations. Where there are significant points of disagreement between interviewees, or between our expectations and the overall results, we will note potential contributing factors.

We will conduct a quantitative analysis of responses to the community satisfaction interviews, and will provide, for example, average community satisfaction scores, as well as scores broken down by EPA cleanup program, TA program (e.g., TAG, TASC, TAB), and TA service (e.g. facilitation, written materials). We will conduct this analysis using both IE's community satisfaction interviews as well as data from interviews previously conducted by Skeo.

INTERVIEW GUIDE: SUPERFUND HQ CONTACTS AND CONTRACTOR (SKEO)

Background Questions

1. Can you briefly summarize your position within the Superfund program?
2. Can you briefly summarize your activities and responsibilities related to technical assistance and information dissemination at Superfund sites?

Questions on TASC

3. What are the communication methods through which communities typically hear about TASC?

    a. Some examples of communication methods may be Internet sites or e-mail.

    Addresses Evaluation Question(s): 2a

4. What are the communication methods through which you communicate TASC availability and guidelines to Regions?

    Addresses Evaluation Question(s): 2a

5. What are the key factors that determine whether the EPA Region will use the TASC contract at a specific site?

    a. For example, does the level of contamination of the site or the demographics of the community factor into the decision on whether TASC funds are used? If so, how so?

    Addresses Evaluation Question(s): 2a

6. Does EPA maintain existing documentation on selection criteria for TASC funds?

    a. If so, could you provide us with documentation on this issue?

    b. Are communities asked to "apply" for TASC?

    Addresses Evaluation Question(s): 2c

7. Are there more communities that meet the criteria for receiving TASC assistance than funds available?

    a. If so, how are award decisions made between qualifying groups?

    b. If so, do you track the universe of sites that meet the criteria for receiving TASC that have not received it?

    Addresses Evaluation Question(s): 2c

8. (For Skeo only) As of January of 2012, you had indicated that the TASC contract had been used at 27 Superfund sites. Does this number need to be updated?

   Addresses Evaluation Question(s): 4

9. (For Skeo only) As of January of 2012, Skeo completed 50 evaluations of TASC; have you completed more?

   a. If yes, please share the additional evaluations with us.

   Addresses Evaluation Question(s): 4

Questions on TAGs

10. What are the communication methods through which communities typically hear about TAGs?

    a. Some examples of communication methods may be internet sites or e-mail.

    Addresses Evaluation Question(s): 2a

11. What are the key factors that determine whether communities receive TAGs?

    a. For example, does the size of the community group or the demographics of the community factor into the decision on whether certain community groups are awarded TAGs? If so, how so?

    Addresses Evaluation Question(s): 2a

12. Does EPA maintain existing documentation on selection criteria for TAG funds, including scoring sheets for RFPs?

    a. If so, could you provide us with documentation on this issue?

    Addresses Evaluation Question(s): 2c

13. Are there more communities that meet the criteria for receiving TAGs than funds available?

    a. If so, how are award decisions made between qualifying groups?

    Addresses Evaluation Question(s): 2c

14. Are there sites where two or more community groups compete for only one TAG?

    a. If so, how often does this occur?

    b. If so, how are award decisions made between groups?

Addresses Evaluation Question(s): 2c

15. Do TAG recipients share information with other community groups and stakeholders?
    a. Does EPA encourage them to share information? If yes, how?

Addresses Evaluation Question(s): 2a

16. Have you seen tensions arise between TAG grantees and other community groups and stakeholders?
    a. If yes, can you give an example of the type of issues that arise?

Addresses Evaluation Question(s): 2a

17. Do you maintain information on the types of TA that have been provided to each grantee?
    a. If so, can you provide this information to us?

Addresses Evaluation Question(s): 4

18. We plan on conducting community satisfaction surveys with 10 TAG recipients; are there any communities that you recommend in particular?
    a. If yes, why?

Addresses Evaluation Question(s): 4

Other Questions

19. Have you identified any gaps in EPA's technical assistance coverage at Superfund sites?

    a. If so, please identify these gaps.

Addresses Evaluation Question(s): 2e

20. Have you identified any gaps in EPA's information dissemination coverage at Superfund sites?

    a. If so, please identify these gaps.

Addresses Evaluation Question(s): 2e

21. Please describe the types of in-kind community assistance that EPA provides at Superfund sites, outside of formal programs such as TAGs and TASC?

    a. How does EPA HQ define and promote in-kind TA to Regions?

i. Is guidance available on providing in-kind TA?

ii. Do you make a distinction between project-related community engagement efforts and in-kind TA provided during a project?

Addresses Evaluation Question(s): 2d

22. Does EPA HQ track how each Region conducts TA? For example, do you track:

    a. The number of Community Involvement Coordinators?

    b. The number of CIPs?

    c. The use of project contractors?

    d. The general approach that each Region uses to conduct TA?

Addresses Evaluation Question(s): 2a

23. One of the goals of the evaluation is to develop measures for EPA to use moving forward to assess the success of OSWER's TA and ID practices. In your opinion, what constitutes successful TA and/or ID?

    a. Do you currently track any metrics that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

    b. Are there any metrics that you are not currently tracking that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

Addresses Evaluation Question(s): 5 and 6

24. Do you have any other thoughts that you would like to share with us to inform our project?

INTERVIEW GUIDE: SUPERFUND REGIONAL CONTACTS

Background Questions

1. Can you briefly summarize your position within the Superfund program?
2. Can you briefly summarize your activities and responsibilities related to technical assistance and information dissemination at Superfund sites?

Questions on CIPs

3. Are CIPs developed for each Superfund site in your Region?
    a. If not, explain why CIPs are not developed for each site.

    Addresses Evaluation Question(s): 2a, 3

4. How frequently are CIPs revised within your Region to meet the changing needs of the community?

    Addresses Evaluation Question(s): 2a, 3

5. Are the information dissemination practices identified in the CIP always carried out when deciding what information to share with the community and what communication method through which to share it?
    a. If not, please elaborate on why these practices are not always followed.

    Addresses Evaluation Question(s): 2a

6. How do you rate CIPs as a tool to ensure effective technical assistance and information delivery throughout the lifetime of the project?
    a. If not, what improvements could be made to the process?

    Addresses Evaluation Question(s): 3

Questions on TASC

7. What are the communication methods through which communities typically hear about TASC?
    a. Some examples of communication methods may be internet sites or e-mail.

    Addresses Evaluation Question(s): 2a

8. What are the key factors that determine whether the EPA Region will use the TASC contract at a specific site?

a. For example, does the level of contamination of the site or the demographics of the community factor into the decision on whether TASC funds are used? If so, how so?

Addresses Evaluation Question(s): 2a

9. Does EPA maintain existing documentation on selection criteria for TASC funds?

    a. If so, could you provide us with documentation on this issue?

Addresses Evaluation Question(s): 2c

10. Are there more communities that meet the criteria for receiving TASC assistance than funds available?

    a. If so, how are award decisions made between qualifying groups?

    b. Are communities ever asked to "apply" for TASC?

Addresses Evaluation Question(s): 2c

Questions on TAGs

11. What are the communication methods through which communities typically hear about TAGs?

    a. Some examples of communication methods may be internet sites or e-mail.

Addresses Evaluation Question(s): 2a

12. What are the key factors that determine whether communities receive TAGs?

    a. For example, does the size of the community group or the demographics of the community factor into the decision on whether certain community groups are awarded TAGs? If so, how so?

Addresses Evaluation Question(s): 2a

13. Does EPA maintain existing documentation on selection criteria for TAG funds, including scoring sheets for RFPs?

    a. If so, could you provide us with documentation on this issue?

Addresses Evaluation Question(s): 2c

14. Are there more communities that meet the criteria for receiving TAGs than funds available?

    a. If so, how are award decisions made between qualifying groups?

Addresses Evaluation Question(s): 2c

15. Do TAG recipients share information with other community groups and stakeholders?
    a. Does EPA encourage them to share information? If yes, how?

Addresses Evaluation Question(s): 2a

16. Have you seen tensions arise between TAG grantees and other community groups and stakeholders?
    a. If yes, can you give an example of the type of issues that arise?

Addresses Evaluation Question(s): 2a

17. (Ask only if HQ has not provided the information) Do you maintain information on the types of TA that have been provided to each grantee?
    a. If yes, can you provide this information to us?

Addresses Evaluation Question(s): 4

Other Questions

18. Have you identified any gaps in EPA's technical assistance coverage at Superfund sites in your Region?
    a. If so, please identify these gaps.

Addresses Evaluation Question(s): 2e

19. Have you identified any gaps in EPA's information dissemination coverage at Superfund sites in your Region?
    a. If so, please identify these gaps.

Addresses Evaluation Question(s): 2e

20. Do you provide any in-kind community assistance at Superfund sites, outside of formal programs in your Region?
    a. If so, please elaborate on the types of in-kind assistance you provide.

Addresses Evaluation Question(s): 2d

21. One of the goals of the evaluation is to develop measures for EPA to use moving forward to assess the success of OSWER's TA and ID practices. In your opinion, what constitutes successful TA and/or ID?

a. Do you currently track any metrics that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

b. Are there any metrics that you are not currently tracking that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

Addresses Evaluation Question(s): 5 and 6

22. To what extent does your Region use the EPA Conflict Resolution and Prevention Center? Please elaborate.

Addresses Evaluation Question(s): 2a

23. Do you have any other thoughts that you would like to share with us to inform our project?

INTERVIEW GUIDE: RCRA CORRECTIVE ACTION HQ CONTACTS

Introductory Questions

1. Can you briefly summarize your position within RCRA Corrective Action (CA)?
2. Can you briefly summarize your activities and responsibilities related to technical assistance and information dissemination at RCRA CA sites?
3. Is EPA required to provide ID and TA to communities?
    a. If so, what are the requirements?
    b. Are there additional drivers to provide ID and TA outside of formal requirements?
        i. If so, what are these drivers?

Addresses Evaluation Question(s): 1

Questions on TASC

4. What are the communication methods through which RCRA CA communities typically hear about TASC?
    a. Some examples of communication methods may be internet sites or e-mail.

Addresses Evaluation Question(s): 2a

5. What are the key factors that determine whether the EPA Region will use the TASC contract at a specific RCRA CA site?
    a. For example, does the level of contamination of the site or the demographics of the community factor into the decision on whether TASC funds are used? If so, how so?

Addresses Evaluation Question(s): 2a

6. Does EPA maintain existing documentation on selection criteria for TASC funds?
    a. If so, could you provide us with documentation on this issue?
    b. Are communities ever asked to "apply" for TASC?

Addresses Evaluation Question(s): 2c

7. Only five RCRA CA sites have received TASC assistance. Are there more communities that meet the criteria for receiving TASC assistance than funds available?

a. If so, how are award decisions made between qualifying groups?

Addresses Evaluation Question(s): 2c

General Questions

8. How does EPA track community involvement activities within RCRA CA, if at all?

    a. Does EPA track community involvement for sites where EPA leads these activities (in non-delegated states, and/or in states where the Region and state have a work sharing relationship for certain sites)?

    b. Please provide any documentation you have that tracks community-involvement activities within RCRA.

    Addresses Evaluation Question(s): 1

9. Do you provide any in-kind community assistance at RCRA CA sites, outside of formal programs?

    a. If so, please elaborate on the types of in-kind assistance you provide.

    Addresses Evaluation Question(s): 2d

10. Have you identified any gaps in EPA's technical assistance coverage at RCRA CA sites?

    a. If so, please identify these gaps.

    Addresses Evaluation Question(s): 2e

11. How does HQ communicate and/or promote community engagement with the Regions?

    Addresses Evaluation Question(s): 2a

12. How does EPA conduct community engagement at EPA-lead sites?

    a. Is there guidance from HQ to the Regions?

13. Have you identified any gaps in EPA's information dissemination coverage at RCRA CA sites?

    a. If so, please identify these gaps.

    Addresses Evaluation Question(s): 2e

14. Which EPA Regions and states do you recommend that we talk with as part of this evaluation? We plan on talking with 4-6 Regions and six states. As we noted in our email to you, we would like to talk to talk with an EPA staff member in Region 4, but we would like your opinion on which Regions and delegated states

would provide us with the most information on ID and TA practices, as well as TASC usage. The only states we do not want to speak with are CT, MS, SC, and MA, because the RCRA Compendium provided information on programs in these states.

15. One of the goals of the evaluation is to develop measures for EPA to use moving forward to assess the success of OSWER's TA and ID practices. In your opinion, what constitutes successful TA and/or ID?

    a. Do you currently track any metrics that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

    b. Are there any metrics that you are not currently tracking that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

    Addresses Evaluation Question(s): 5 and 6

16. Do you have any other thoughts that you would like to share with us to inform our project?

INTERVIEW GUIDE: RCRA CORRECTIVE ACTION REGIONAL CONTACTS

Introductory Questions

1. Can you briefly summarize your position within RCRA Corrective Action?
2. Can you briefly summarize your activities and responsibilities related to technical assistance and information dissemination at RCRA CA sites?
3. Is EPA required to provide ID and TA to communities?
    a. If so, what are the requirements?
    b. Are there additional drivers to provide ID and TA outside of formal requirements?
        i. If so, what are these drivers?

Addresses Evaluation Question(s): 1

Questions on Standard Community Involvement Practices at EPA-Led Sites

The following questions pertain only to EPA-led sites; does your Region lead cleanup at any RCRA CA sites? (If not, skip section)

4. Does the Region provide public notice at RCRA CA sites?
    a. If not, what are the key factors in determining whether a public notice is issued?

    Addresses Evaluation Question(s): 2a

5. Does the Region provide an opportunity for public comment at RCRA CA sites?
    a. If not, what are the key factors in determining whether there is an opportunity for public comment?

    Addresses Evaluation Question(s): 2a

6. Does the Region hold public meetings to address the community's concerns at RCRA CA sites?
    a. If not, does the Region hold public meetings to address the community's concerns at RCRA CA sites?
        i. If so, please provide examples of sites for which your Region held public meetings and,
        ii. Provide the key factors in deciding whether to hold public meetings.

Addresses Evaluation Question(s): 2a

7. Does EPA take the lead on community engagement at state-lead sites?

    a. If so, how is the lead for community engagement decided?

8. Are there other community involvement practices that your Region uses when directly implementing corrective action, specifically involving information dissemination or technical assistance?

    a. If so, please elaborate on:

        iii. The extent to which these practices implemented.

        iv. Examples of how community engagement plays out at your sites.

        v. The key factors in deciding whether to implement these practices at specific sites.

Addresses Evaluation Question(s): 2a

Questions on TASC

9. What are the communication methods through which communities typically hear about TASC?

    a. Some examples of communication methods may be internet sites or e-mail.

Addresses Evaluation Question(s): 2a

10. What are the key factors that determine whether the EPA Region will use the TASC contract at a specific RCRA CA site?

    b. For example, does the level of contamination of the site or the demographics of the community factor into the decision on whether TASC funds are used? If so, how so?

Addresses Evaluation Question(s): 2a

11. Does EPA maintain existing documentation on selection criteria for TASC funds?

    c. If so, could you provide us with documentation on this issue?

Addresses Evaluation Question(s): 2c

12. Are there more communities that meet the criteria for receiving TASC assistance than funds available?

    a. If so, how are award decisions made between qualifying groups?

b. Are communities ever asked to "apply" for TASC?

Addresses Evaluation Question(s): 2c

General Questions

13. Does the Region track community engagement activities at state-led sites?

    d. If yes, what information is available on frequency of engagement, types of engagement, etc.? Can you share it with us?

14. Do you provide any in-kind community assistance, or assistance outside of formal grant programs, at RCRA CA sites that are led by the states?

    e. If so, please elaborate on the types of in-kind assistance you provide.

Addresses Evaluation Question(s): 2d

15. We plan on conducting interviews with 6 delegated states; are there any states that you recommend in particular? (The only states we do not want to speak with are CT, MS, SC, and MA because of research already available on programs in those states).
    a. If yes, why?

Addresses Evaluation Question(s): 4

16. We plan on conducting community satisfaction surveys with 9-12 communities in delegated states and 2-3 in non-delegated states. We will be using the same format that Superfund's contractor, Skeo Solutions, has been using for years to assess communities' satisfaction with TASC assistance. This format consists of asking communities their level of satisfaction with the technical assistance they've received on a scale of 1 to 6, with 6 meaning very satisfied and 6 meaning very unsatisfied. Are there any communities that you recommend in particular?
    a. If yes, why?

Addresses Evaluation Question(s): 4

17. Have you identified any gaps in EPA's technical assistance coverage at RCRA CA sites in your Region?

    a. If so, please identify these gaps.

Addresses Evaluation Question(s): 2e

18. Have you identified any gaps in EPA's information dissemination coverage at RCRA CA sites in your Region?

    b. If so, please identify these gaps.

Addresses Evaluation Question(s): 2e

19. One of the goals of the evaluation is to develop measures for EPA to use moving forward to assess the success of OSWER's TA and ID practices. In your opinion, what constitutes successful TA and/or ID?

    a. Do you currently track any metrics that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

    b. Are there any metrics that you are not currently tracking that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

Addresses Evaluation Question(s): 5 and 6

20. Does your Region use the EPA Conflict Resolution and Prevention Center? Why or why not?

Addresses Evaluation Question(s): 2a

21. Do you have any other thoughts that you would like to share with us to inform our project?

INTERVIEW GUIDE: RCRA CORRECTIVE ACTION STATE CONTACTS

Introductory Questions

1. Can you briefly summarize your position as it relates to RCRA Corrective Action within your state?

2. Can you briefly summarize your activities and responsibilities related to public involvement at RCRA CA sites?

3. Is EPA required to provide ID and TA to communities?

    a. If so, what are the requirements?

    b. Are there additional drivers to provide ID and TA outside of formal requirements?

        i. If so, what are these drivers?

Addresses Evaluation Question(s): 1

Questions on Standard Community Involvement Practices at State-Lead Sites

4. Does the state provide public notice at every RCRA CA site?

    a. If not, what are the key factors in determining whether a public notice is issued?

Addresses Evaluation Question(s): 2a

5. Does the state provide an opportunity for public comment at every RCRA CA site?

    a. If not, what are the key factors in determining whether there is an opportunity for public comment?

Addresses Evaluation Question(s): 2a

6. Does the state hold public meetings to address the community's concerns at every RCRA CA site?

    a. If not, does the state hold public meetings to address the community's concerns at any RCRA CA sites?

        i. If so, please provide examples of sites for which your state held public meetings and,

        ii. Provide the key factors in deciding whether to hold public meetings.

Addresses Evaluation Question(s): 2a

7. Does the state have any formal TA or ID programs for communities?

    a. If so, please elaborate on each formal TA or ID program.

    Addresses Evaluation Question(s): 2a

8. Do you work with EPA to conduct community engagement at state-lead sites?
    Addresses Evaluation Question(s): 2a

9. Do you provide any in-kind community assistance, or assistance outside of formal grant programs, at RCRA CA sites, outside of formal programs in your state?

    a. If so, please elaborate on the types of in-kind assistance you provide.

    Addresses Evaluation Question(s): 2d

10. Are there other community involvement practices that your state takes when directly implementing corrective action, specifically involving information dissemination or technical assistance?

    a. If so, please provide:

        i. To what extent are these practices implemented.

        ii. If they are not universally implemented, examples of sites at which they were implemented, and

        iii. The key factors in deciding whether to implement these practices at specific sites.

    Addresses Evaluation Question(s): 2a

11. We plan on conducting community satisfaction surveys several communities. We will be using the same format that Superfund's contractor, Skeo Solutions, has been using for years to assess communities' satisfaction with TASC assistance. This format consists of asking communities their level of satisfaction with the technical assistance they've received on a scale of 1 to 6, with 6 meaning very satisfied and 6 meaning very unsatisfied. Are there any communities in your state that you recommend in particular?
    a. If yes, why?

    Addresses Evaluation Question(s): 4

12. Do you have any other thoughts that you would like to share with us to inform our project?

INTERVIEW GUIDE: BROWNFIELDS HQ CONTACTS

Introductory Questions

1. Can you briefly summarize your position within Brownfields?
2. Can you briefly summarize your activities and responsibilities related to public involvement at Brownfields sites?
3. Is EPA required to provide ID and TA to communities?
    a. If so, what are the requirements?
    b. Are there additional drivers to provide ID and TA outside of formal requirements?
        i. If so, what are these drivers?

    Addresses Evaluation Question(s): 1
4. Does Brownfields directly provide any in-kind community assistance at Brownfields sites, outside of grantee-led activities?
    a. If so, please elaborate on the types of in-kind assistance you provide.

    Addresses Evaluation Question(s): 2d
5. We understand that OBLR uses scoring criteria for community involvement within grant RFPs. How does EPA know that community involvement activities identified in grant applications are carried out?
    a. Are community involvement activities covered in regular grant reporting?
        i. If yes, could you share data available?
    b. If a community does not carry out involvement activities specified, does EPA take any action?

    Addresses Evaluation Question(s): 1
6. Outside of grant reporting, has EPA collected any qualitative information from grantees about community involvement that you can share with us?

    Addresses Evaluation Question(s): 2a
7. Have you identified any gaps in EPA's technical assistance coverage at Brownfields sites?
    a. If so, please identify these gaps.

Addresses Evaluation Question(s): 2e

8. Have you identified any gaps in EPA's information dissemination coverage at Brownfields sites?

    a. If so, please identify these gaps.

Addresses Evaluation Question(s): 2e

9. One of the goals of the evaluation is to develop measures for EPA to use moving forward to assess the success of OSWER's TA and ID practices. In your opinion, what constitutes successful TA and/or ID?

    a. Do you currently track any metrics that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

    b. Are there any metrics that you are not currently tracking that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

Addresses Evaluation Question(s): 5 and 6

10. Do you have any other thoughts that you would like to share with us to inform our project?

INTERVIEW GUIDE: BROWNFIELDS REGIONAL CONTACTS

Introductory Questions

1. Can you briefly summarize your position within Brownfields?
2. Can you briefly summarize your activities and responsibilities related to public involvement at Brownfields sites?
3. Is EPA required to provide ID and TA to communities?
    a. If so, what are the requirements?
    b. Are there additional drivers to provide ID and TA outside of formal requirements?
        i. If so, what are these drivers?

    Addresses Evaluation Question(s): 1
4. Does Brownfields directly provide any in-kind community assistance, or assistance outside of formal grant programs, at Brownfields sites?
    a. If so, please elaborate on the types of in-kind assistance you provide.

    Addresses Evaluation Question(s): 2d
5. We understand that OBLR uses scoring criteria for community involvement within grant RFPs. How does EPA know that community involvement activities identified in grant applications are carried out?
    a. Are community involvement activities covered in regular grant reporting?
        i. If yes, could you share data available?
    b. If a community does not carry out involvement activities specified, does EPA take any action?

    Addresses Evaluation Question(s): 1
6. Outside of grant reporting, has EPA collected any qualitative information from grantees about community involvement that you can share with us?

    Addresses Evaluation Question(s): 2a
7. What are the methods of referral that you typically employ to communicate the availability of TAB to communities in your Region?
    a. For each method, how often do you typically refer a community to the TAB grantee using this method of referral?

    Addresses Evaluation Question(s): 2a, 2b

8. Have you identified any gaps in EPA's technical assistance coverage at Brownfields sites?

    a. If so, please identify these gaps.

    Addresses Evaluation Question(s): 2e

9. Have you identified any gaps in EPA's information dissemination coverage at Brownfields sites?

    a. If so, please identify these gaps.

    Addresses Evaluation Question(s): 2e

10. One of the goals of the evaluation is to develop measures for EPA to use moving forward to assess the success of OSWER's TA and ID practices. In your opinion, what constitutes successful TA and/or ID?

    a. Do you currently track any metrics that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

    b. Are there any metrics that you are not currently tracking that might help assess the extent to which the TA and/or ID efforts conducted by EPA are successful?

    Addresses Evaluation Question(s): 5 and 6

11. Do you have any other thoughts that you would like to share with us to inform our project?

INTERVIEW GUIDE: TAB GRANTEES

Note: We may further customize this guide based on research on specific TAB grantees.

1. How many communities has your organization provided technical assistance (TA) to since it was awarded the TAB grant?

   Addresses Evaluation Question(s): 2a and 2b

2. What kinds of TA does your organization typically provide?

   a. For example, for help obtaining a grant, or help with technical matters in relation to a Brownfields site, etc.

   Addresses Evaluation Question(s): 2a and 2b

3. How long does the assistance typically last?

   Addresses Evaluation Question(s): 2a and 2b

4. What are the criteria that you use to select which communities receive TA and which do not?

   a. When resources are not available to provide assistance to all communities seeking it, how do you determine which groups to assist?

   Addresses Evaluation Question(s): 2c

5. Through which communication methods do you promote the availability of your services to communities?

   Addresses Evaluation Question(s): 2a

6. IEc is planning on talking with up to 10 communities served by TAB grantees to administer a community satisfaction survey. We will be using the same format that Superfund's contractor, Skeo Solutions, has been using for years to assess communities' satisfaction with TASC assistance. This format consists of asking communities their level of satisfaction with the technical assistance they've received on a scale of 1 to 6, with 6 meaning very satisfied and 6 meaning very unsatisfied. Are there particular communities that you have conducted extensive TA with?

   a. If so, please provide:

      i. The names of these communities

      ii. A point of contact and contact information for each

      iii. A brief description of the assistance provided

   Addresses Evaluation Question(s): 4

INTERVIEW GUIDE: CONFLICT RESOLUTION PREVENTION CENTER (CRPC)

1. How many sites have you provided assistance to?

    a. What types of sites do you typically provide assistance to?

    Addresses Evaluation Question(s): 2a

2. What types of assistance do you typically provide to regions that contact you?

    Addresses Evaluation Question(s): 2a

3. What communication methods do you use to promote your services to the Regions?

    Addresses Evaluation Question(s): 2a

4. Do you ever turn down requests due to resource limitations?

    Addresses Evaluation Question(s): 2c

5. What are your criteria for providing services at a site?

    Addresses Evaluation Question(s): 2c

6. Do you have materials that track the number of sites that have contacted the CRPC?

    a. If so, do these materials include the date range in which you provided assistance to each site?

    b. If so, do these materials outline the type of assistance provided to each site?

    c. Please provide available documentation.

    Addresses Evaluation Question(s): 2a

7. In your opinion, what constitutes successful conflict resolution?

    a. Do you currently track any metrics that might help assess the extent to which the conflict efforts conducted by the CRPC are successful?

    b. Are there any metrics that you are not currently tracking that might help assess the extent to which the conflict resolution efforts conducted by the CRPC are successful?

    Addresses Evaluation Question(s): 5 and 6

INTERVIEW GUIDE: GENERAL COMMUNITY SATISFACTION TEMPLATE

IEc adapted this general template from the existing Skeo community satisfaction interview guides used for specific TASC sites.

1. Using a scale of 1 to 6, please rate how satisfied you are with the quality of assistance provided by [name of individual technical advisor or technical advisory group]'s facilitation efforts for the [name of meeting], where "1" means you are "very dissatisfied" and "6" means you are "very satisfied." Please elaborate on your level of satisfaction.

2. Using a scale of 1 to 6, please rate how satisfied you are with the quality of the presentations given by [name of individual technical advisor or technical advisory group] as part of the [name of meeting]. "1" means "not at all satisfied" and "6" means "very satisfied." Please elaborate on your level of satisfaction.

3. Using a scale of 1 to 6, please indicate how satisfied you are with [name of individual technical advisor or technical advisory group]'s efforts to identify potential issues of community concern in the [formal decision-making document, such as a consent decree]. "1" means "not at all satisfied" and "6" means "very satisfied." Please elaborate on your level of satisfaction.

4. Using a scale of 1 to 6 where "1" means you are "very dissatisfied" and "6" means you are "very satisfied," please indicate how satisfied you are with the quality of [name of document or other resource] prepared by [name of TAG technical advisor or technical advisory group]. Please elaborate on your level of satisfaction.

5. Using a scale of 1 to 6, please rate how satisfied you are with the overall quality of assistance provided by [name of technical advisor or technical advisory group] to support [community name]. "1" means you are "very dissatisfied" and "6" means you are "very satisfied." Please elaborate on your level of satisfaction.

6. How, if at all, could [name of technical advisor or technical advisory group] have improved the quality of services it provided in support of the [name(s) of project/document/meeting]. Please elaborate on your level of satisfaction.

7. Have you identified any areas in which EPA's technical assistance or information dissemination is lacking?

EXAMPLE INTERVIEW GUIDE: SITE-SPECIFIC COMMUNITY SATISFACTION TEMPLATE FOR BROWNFIELDS TAB COMMUNITY

Site Information

Name: Oak Grove Neighborhood
Location: Kansas City, Kansas
Assisted Organization: Oak Grove Neighborhood Association (Clintel Betts)
Assisting Organization: Kansas State University (KSU) (Wendy Griswold)
Start Date: January 2001
Project Narrative: http://www.engg.ksu.edu/CHSR/outreach/tab/sites/oakgrove.html

1. Using a scale of 1 to 6, please rate how satisfied you are with the quality of assistance provided by Wendy Griswold's facilitation efforts for the landfill reuse workshop, where "1" means you are "very dissatisfied" and "6" means you are "very satisfied." Please elaborate on your level of satisfaction.

2. Using a scale of 1 to 6, please rate how satisfied you are with the quality of the presentations given by Wendy Griswold as part of the landfill reuse workshop. "1" means "not at all satisfied" and "6" means "very satisfied." Please elaborate on your level of satisfaction.

3. Using a scale of 1 to 6 where "1" means you are "very dissatisfied" and "6" means you are "very satisfied," please indicate how satisfied you are with the quality of the regional park development poster prepared by Wendy Griswold. Please elaborate on your level of satisfaction.

4. Using a scale of 1 to 6, please rate how satisfied you are with the overall quality of assistance provided by Wendy Griswold to support Oak Grove neighborhood. "1" means you are "very dissatisfied" and "6" means you are "very satisfied." Please elaborate on your level of satisfaction.

5. How, if at all, could Wendy Griswold have improved the quality of services she provided in support of the Oak Grove landfill reuse project. Please elaborate on your level of satisfaction.

6. Have you identified any areas in which EPA's technical assistance or information dissemination is lacking?

APPENDIX B: INTERVIEW SUMMARY COUNT

Superfund

- Superfund HQ: 2
- Superfund Regional: 10
- Satisfaction Interviews with TAG Recipients: 9

RCRA CA

- RCRA CA HQ: 3
- RCRA CA Regional: 10
- Delegated States: 6
- Satisfaction Interviews: 9

Brownfields

- Brownfields HQ: 2
- Brownfields Regional: 10
- TAB and other K6 Grantees: 8
- Satisfaction Interviews with TAB and other K6 Community Contacts: 8

Other Interviews

- Skeo Solutions: 1
- CPRC: 1