

A Report by a Panel of the
NATIONAL ACADEMY OF PUBLIC ADMINISTRATION
for the Environmental Protection Agency

Designing an Assessment Framework for Direct Implementation in Indian Country



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September 2024

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The views expressed in this report are those of the Panel. They do not necessarily reflect the views of the Academy as an institution.

Foreword

The Environmental Protection Agency (EPA) protects human health and the environment. In fulfilling this mission, EPA collaborates closely with state, local, Tribal, and territorial governments. EPA works with these governments to implement environmental statutes and directly implements any time the authority is not delegable or not delegated.

The EPA contracted with the National Academy of Public Administration (Academy) to develop an Indian Country Program Implementation Assessment Plan, which would help guide EPA in conducting efficient reviews of its direct implementation activities within the environmental programs it administers. This report by a Panel of Academy Fellows provides actionable recommendations that, when implemented as an integrated whole, will enable EPA to better safeguard the environment in Indian Country.

As a congressionally chartered, independent, non-partisan, and non-profit organization with over 1000 distinguished Fellows, the Academy has a unique ability to bring nationally recognized public administration experts together to help government agencies address challenges. I deeply appreciate the work of the five Academy Fellows who served on this Panel and commend the Study Team that contributed valuable insights and expertise throughout the project. We are grateful for the constructive engagement of many EPA staff who provided important observations and context to inform this report. Finally, this report has benefited substantially from the input offered by researchers and practitioners with expertise in intergovernmental partnerships and environmental protection.

I trust this report will encourage EPA leaders, as it commends many good practices already in place. It should also serve as an actionable guide to implementing necessary policy, procedural, and structural elements to further develop environmental justice for all and advance EPA's compelling mission.

Teresa W. Gerton

President and Chief Executive Officer
National Academy of Public Administration

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Acronyms and Abbreviations

AIEO	American Indian Environmental Office
CAA	Clean Air Act
The Center	Region 9/Office of International and Tribal Affairs Center of Excellence
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CWA	Clean Water Act
DI	Direct Implementation
EPA	Environmental Protection Agency
ERM	Enterprise Risk Management
ETEP	EPA-Tribal Environmental Plan
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FFDCA	Federal Food, Drug, and Cosmetic Act
FTE	Full-time equivalent
FY	Fiscal year
GAP	General Assistance Program
NPDES	National Pollutant Discharge Elimination System
NPM	National Program Manager
OAR	Office of Air and Radiation
OCSP	Office of Chemical Safety and Pollution Prevention
OCFO	Office of the Chief Financial Officer
OECA	Office of Enforcement and Compliance Assurance
OEJECR	Office of Environmental Justice and External Civil Rights
OGC	Office of General Counsel
OIG	Office of the Inspector General
OITA	Office of International and Tribal Affairs
OLEM	Office of Land and Emergency Management
OMS	Office of Mission Support
ORD	Office of Research and Development
OW	Office of Water
PPA	Pollution Prevention Act
RCRA	Resource Conservation and Recovery Act

SDWA	Safe Drinking Water Act
TAS	Treatment as a State
TSCA	Toxic Substances Control Act
WQS	Water Quality Standards

Executive Summary

EPA leads human and environmental health protection in the United States. In Indian country, this means directly implementing environmental programs in the absence of an EPA-approved Tribal program. DI is typically a small function within each of 38 EPA-defined programs. Those programs operate in nine Regions.

The agency's 2022-2026 Strategic Plan identifies improvement in Indian country as one of five long-term performance goals. To assist, the nationally focused EPA DI Center of Excellence was established. It aims to elevate best practices and establish new metrics, SOPs, and other tools to track progress, improvements, and successes to inform future improvement and priority setting. In the long term, the Center intends to develop a community of practice to facilitate collaborative engagement and continuous improvement across the agency's DI programs. These measures should enhance EPA's operational capacities in Indian country and its ability to provide equity in environmental protection across the country by ensuring DI in Indian Country is as robust as that provided under delegations to States and Territories.

EPA has started many initiatives that hold promise to improve its activities in Indian country. A Panel of National Academy of Public Administration Fellows has made recommendations in three areas based on their understanding of the agency's structure and background (described in Chapter Two) and additional observations (discussed in Chapter Three). They are to

- prioritize incorporating Tribes' perspectives in agency decision-making processes,
- make the Center permanent with adequate capacity to fulfill its mandates and
- expand the centralization, collection, analysis, and monitoring of data about environmental conditions, risks, and practices in Indian country.

These recommendations support the agency's ongoing efforts in specific areas to sustain these improvements and ensure the protection of human and environmental health in Indian country.

The Center is well-positioned to build on the baseline survey it implemented in 2024. An assessment framework presented in Chapter Four provides essential criteria to assess the status of an initial cohort of programs. It identifies recommended criteria that programs can consider as they develop their own continuous improvement programs. It also addresses system improvements that will require the cooperation and collaboration of other EPA offices. Finally, a communications and training plan proposes the next steps for the Center to share baseline survey findings with stakeholders and provide programs with tools to incorporate them into their work.

EPA has a strong starting point for improving DI in Indian country. With the recommendations, framework, and action (communications and training) plan, combined with the agency's commitment, there is good reason to believe DI improvements can be achieved.

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Chapter 1: Introduction

The Environmental Protection Agency (EPA) Office of International and Tribal Affairs (OITA), American Indian Environmental Office (AIEO) contracted with the Academy to develop an Indian Country Direct Implementation Assessment Plan to develop tools and a framework to help guide EPA to conduct efficient reviews of its environmental program Direct Implementation operations in Indian Country. Where EPA's authorities provide, and where tribes are eligible, willing, and able, and apply to EPA for such authority, EPA may approve tribes to assume regulatory and program management responsibilities in Indian country through the treatment as a state (TAS) process. However, as stated in EPA's [Direct Implementation of Federal Environmental Programs in Indian country policy](#), "until tribal governments are willing and able to assume full responsibility for delegable programs, EPA generally retains responsibility for managing federal environmental programs in Indian country. This responsibility of the EPA is known as Direct Implementation (DI)." The Academy developed an assessment plan based on a coordinated understanding of EPA's responsibilities established in federal statutes and regulations, which includes EPA's activities in Indian country, stakeholder and community engagement, and a communication and training plan to help EPA analyze and effect change to ensure protection of human health and the environment in Indian country.

The Academy appointed a five-member Panel of Fellows to oversee and guide this study. Panel members have experience and expertise in environmental regulations, EPA structure, programs, systems, program assessment, policy implementation, intergovernmental systems, Tribal community development, and the U.S. federal system. Their mix of backgrounds allowed them to consider many aspects of EPA's challenges and opportunities related to the DI function. More information on the Panel members and Study Team is provided in Appendix 1.

Methodology

Research and analysis used information collected through document review, interviews, and meetings. EPA documents included policies, studies, and program evaluations. A few articles and other documents were sourced from outside EPA. Interviews and meetings constituted a substantial source of information. All interviews were conducted on a not-for-attribution basis. Meetings with groups of EPA officials yielded vital background information on the history, status, challenges, and opportunities of DI in Indian Country. Many individuals contributed to this work; a list of individuals interviewed for this study appears in Appendix 2.

Report Organization

This report has three main components. First, the Panel developed three broad strategic recommendations for improving DI in the context of overall EPA operations. Second, a framework will allow EPA staff to assess how much DI is being carried out, whether it is being carried out consistently, where programs may need additional resources and capacity, and how programs use metrics to track, assess, and improve their work. Finally, a communications and training plan guides the Center's efforts to share information with EPA staff and show them how to use information in their work.

Chapter 2: Recommendations

This chapter presents the Panel's strategic recommendations for improving Direct Implementation (DI) in the context of overall EPA operations. These recommendations are separate and in addition to the EPA-proposed project to develop assessment criteria for EPA programs with DI responsibilities. Some recommendations call for EPA leaders to make policy decisions affecting the agency's activities in Indian country, including investment in capacity. The Panel based recommendations on their understanding of the agency's structure and background and additional observations discussed in greater detail throughout the chapter.

Recommendation 1: Prioritize Incorporating Tribes' Perspectives in Agency Decision Making Processes

EPA should address the tension between Tribal governments' priorities and EPA requirements and authorities, when they exist, by ensuring consideration of Tribal government priorities in agency decision-making and priority-setting. A Tribe's EPA-Tribal Environmental Plan (ETEP) process may be able to identify and create alignment of EPA responsibilities and Tribal priorities.

Recommendation 1.1: Balance statutory mandates, Tribes' priorities, and positive environmental outcomes in decision making

Ensuring that statutory obligations are met can seem at odds with supporting Tribal autonomy and positive environmental outcomes, especially when Tribal priorities do not align precisely with EPA's statutory mandates. Achieving balance can be further complicated by the diversity of Tribes' needs, priorities, current and historical relationships with the federal government, and lack of clarity about EPA's DI statutory mandates. Agency leaders could promote balance within programs through communication and policy. The newly created EPA Direct Implementation Center of Excellence (the Center) can also elevate examples of programs that simultaneously support Tribal priorities, meet requirements, and advance positive environmental outcomes.

Recommendation 1.2: Coordinate engagement with Indian country communities

DI programs and Tribal assistance programs should initiate or increase coordination when possible. Coordination across Regional functions should consider each Tribe's unique needs and perspectives.

EPA programs operate independently from each other and other agency activities in Indian country in many cases. In addition to administering regulatory programs, the Regional offices conduct Tribal relations, provide grants, collaborate with Tribes to develop the EPA-Tribal Environmental Plan (ETEP), and provide technical assistance. Some Regions have been able to bridge programmatic and assistance functions, but others have not. DI and grant administration, including the development of ETEPs, are handled by separate offices.

Recommendation 2: Make the Center of Excellence Permanent with Additional Capacity to Fulfill Its Mandates

The Center of Excellence was established in 2023 by OITA and is currently located in the Lead Region 9. It is currently authorized and funded through September 2026. OITA and Region 9 established a broad mandate for the Center to assist EPA in developing a culture of continuous improvement for EPA’s DI performance into the future. Specifically, Center staff are to complete a national assessment of Indian country DI program performance and set up a long-term framework for DI performance measurement, transparency, accountability, and collaborative engagement. Engaging with the 38 distinct DI programs identified in the baseline survey is a key element of this work. Permanence would allow the Center to fulfill this vast mandate.

In less than a year of operation, the Center staff has engaged with Regional and National program leaders and staff to raise awareness of EPA DI activities in Indian country. The Center also implemented a baseline survey that collected information on the programmatic and resource needs, best practices, and the universe of DI activities in Indian country across eight environmental statutes, all EPA regions,

Continuous improvement is a management approach that relies on making incremental improvements on a regular basis. It involves setting targets, measuring progress towards attaining those targets, and taking steps to close gaps. EPA’s Office of Continuous Improvement is in the Office of the Chief Financial Officer.

and national programs. The Center will use this information to complete a performance assessment of DI programs and engage with programs to identify actions for continuous improvement. As the Center continues its data collection, analysis, program assessments, and direct engagement, a more nuanced understanding of steps needed to improve DI will emerge.

A permanent Center could also take on the system-level improvements required to coordinate and follow through with other headquarters offices. Decentralization means that coordination and the creation of new systems will require alignment among many functions and offices.

Finally, providing the level and duration of support programs need to develop a culture of continuous improvement will require more than a three-year window with a staff of four full-time equivalents (FTEs). It will also require creating tools for program staff and leaders across the Regional offices and headquarters to develop their own improvement plans based on the baseline survey findings.

Recommendation 2.1: Permanently provide for the Center to assess Direct Implementation agency-wide

The Center of Excellence should be made permanent to establish and maintain recurring DI assessment. Assessing DI is an important step toward improving EPA activities in Indian country. It is a crucial starting point to effect the system-level change needed to achieve the [Administrator’s commitment](#) to “ensure that the programs it administers inside Indian country achieve a similar degree of protection from environmental and health hazards as those it administers outside Indian country.”

Recommendation 2.2: Permanently provide for the Center to improve learning across Regions and Headquarters

Program staff in Regional offices have limited opportunities to coordinate with or learn from staff in other Regions and other programs. Program structures, requirements, and area conditions (such as geography, remoteness, climate, settlement density, natural features, and Tribal languages, culture, and history) vary greatly, but they also have some common characteristics. At a high level, they all operate within the same EPA legal framework. Every Region is responsible for aligning with EPA’s policy to work with Tribes on a government-to-government basis. They are bound by the “trust responsibility” to Tribes, which is a special fiduciary obligation to protect Tribal resources and uphold the rights of indigenous peoples to govern themselves on Tribal lands. Operationally, Regional program staff exercise discretion in navigating interactions with Tribal communities. The Center should explore and support opportunities for constructive standardization, cross-community learning, and coordination as part of this process.

Recommendation 2.3: Permanently provide for the Center to collect, index, and share effective tools, processes, standard operating procedures, and other implementation materials.

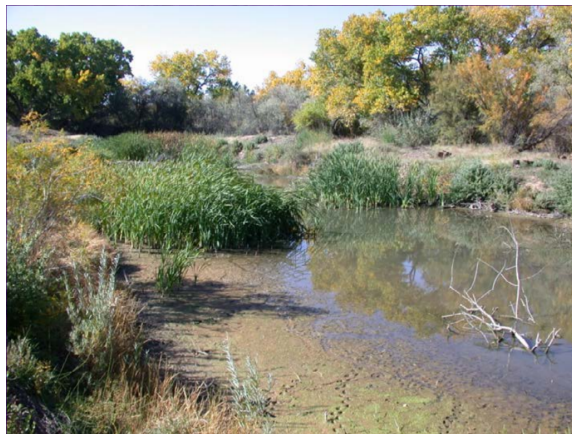
Sharing best practices was part of the Center’s original charge. The initial data collection asked programs to identify effective tools, processes, and procedures. To further enhance learning across regions and headquarters, the Center can tag and sort this information and develop search mechanisms that make this information more available and useful to Tribal leaders and members, other environmental programs, and the public while building the capacity to search for and share increasingly effective and cost-effective practices. Figure 1. gives a brief example.

Recommendation 2.4: Permanently provide for the Center to provide support to programs operating in Indian country

The Center is charged with potentially supporting many programs. In this context, a “program” implements an aspect of a statute. Examples include the NPDES Permits Program, the Water Quality Standards Program, and the Air Planning Program. Because environmental characteristics vary substantially across Regions, not all programs are present in all Regions. The Academy Panel believes that additional EPA staff will be needed to meaningfully engage with EPA programs to achieve Center goals by the end of FY 2026.

Figure 1. Tribal Initiatives Can Successfully Address Environmental Challenges

The Pueblo of Sandia (in EPA Region 6) successfully addressed severe contamination of the Rio Grande River by developing and implementing U.S. EPA-approved water quality standards. Awarded “treatment as state” status in 1990, the Pueblo gained control over local and regional water issues. Their efforts earned EPA’s “Partnership in Environmental Excellence Award” in 1997. The Pueblo people ensure the program’s future success by involving grade school students in water quality testing. This initiative demonstrates that Tribal efforts can effectively tackle environmental challenges and foster a new generation of environmental stewards.



Source: 1999. [Water Quality Standards | Pueblo of Sandia](#). [Photo Source](#)

Recommendation 2.5: Permanently provide for the Center to work within the agency to develop external systems adaptations and policies needed to support DI

The Center should work with the Office of Mission Support (OMS) and other offices to identify and pursue facility, environmental, and health data quality and management improvement opportunities. The Center is uniquely qualified to identify the key aspects of program operations to be supported by an integrated system and operations improvements made possible by enhanced access to information. Higher-quality data about environmental conditions in Indian country that is integrated into program management is vital to achieving improvement. This charge is closely related to a long-term performance goal in EPA’s 2022-2026 [strategic plan](#) to undertake “100 significant actions that will result in measurable improvements in Indian country.” Creating and linking data systems is both a technological and management challenge.

The Center should work to ensure DI administrative risks are identified and managed. Distinct from environmental and health risks, administrative risks relate to internal organizational strategy, program, reporting, technology, finances, and other operational functions. These risks may interfere with the agency’s ability to provide accountability, efficiency, responsiveness, and other good governance practices.

EPA’s approach to managing risk can inform DI risk management. One suggestion is using the Enterprise Risk Management (ERM) framework as a strategic approach that helps public sector organizations identify, assess, and manage risks and opportunities that could impact their objectives. It integrates risk management into all aspects of decision making and operations. By proactively addressing potential threats and leveraging opportunities, ERM enhances organizational resilience, improves resource allocation, and supports achieving strategic goals. This comprehensive approach ensures that risks are managed consistently across the

organization, fostering a culture of risk awareness and informed decision making. ERM focuses on the most significant risks an agency faces. The small scale of DI ensures that it will not rise to the top, but it is a function area worthy of attention. **Error! Reference source not found.**

Recommendation 3: Expand the Centralization, Collection, Analysis, and Monitoring of Data Pertaining to Environmental Conditions, Risks, and Practices in Indian Country

Centralized data systems do not fully capture DI activity or environmental conditions in Indian country. Some data are stored in multiple national-level systems, while others are collected at the Regional level.

The lack of ready access to centralized or comprehensive data and information on environmental and health conditions has negative consequences. EPA cannot report on the full array of DI activities or program performance. The agency cannot determine if its administration of non-delegated programs in Indian country is achieving a similar degree of protection from environmental and health hazards as in the rest of the United States. EPA's ability to provide agency-level accountability to Indian country communities is limited. Finally, decision making may be less than optimal because officials cannot fully consider measures of actual conditions, risk, or the effectiveness of activities.

Another challenge to collecting accurate and informative data relates to the shifting scope of Indian country. Defining the boundaries between states and Indian country can be difficult. State boundaries are fixed, but Indian country is a patchwork quilt of land within states that has changed over time due to allotment, land transfers, and the establishment of reservations.

Because DI data is dispersed across programs and Regional offices, stitching it together into a single system will be a large task. It will require an in-depth understanding of both the processes that create the data and the users who will access it. Adapting to changing data availability may need training or process realignment.

Recommendation 3.1: Designate an Indian country data lead

An individual or office should be "in charge" of data monitoring, including DI monitoring, with continuous observation and assessment of data to ensure its accuracy, quality, and alignment with environmental objectives, complemented by ongoing analyses that make the data useful for priority setting and improvement efforts. Increased real-time tracking will allow the identification of emerging problems. Monitored data should include data on human and environmental health (outcomes) and factors affecting those outcomes (such as changes in rain levels or economic activity with environmental impacts, such as warehouses) and on specific program functions, such as monitoring completeness and accuracy, permits issued, permitted allowance, compliance with permit conditions, enforcement actions taken, final resolutions, and costs associated with those activities (outputs). Information currently being gathered by the Center should inform data collection parameters.

Recommendation 3.2. Ensure the collection and compilation of output and outcome data on Tribal lands

National Program Managers may be the best situated to collect and compile comprehensive environmental and human health data. Regional offices should have much of the needed data, although the format, structure, scales, terminology, and time intervals may vary. Tribes may be able to collect and compile data, although there would be similar challenges.

Collected and compiled human and environmental health data should include outputs and outcomes. Outputs are the immediate, tangible results of regulatory actions. Examples include the number of inspections conducted, permits issued, or pollution control devices installed. Outputs are often quantifiable and should be directly linked to the activities performed. By contrast, outcomes measure environmental and public health impacts, such as air and water pollution reductions, enhanced public awareness, or public health benefits. Having output and outcome data allows officials to fully understand effectiveness and areas needing improvement. It also allows for better decision making and strategic planning, as officials can identify which activities lead to desired outcomes and adjust accordingly.

Recommendation 3.3. Make non-sensitive data readily accessible

Data and analysis should be shared with Tribes to help them identify priorities and plan how best to address them with EPA. The data lead should work with states, Tribes, and other agencies to access related data, providing insight into outcomes. Tribes could use data and analysis to raise awareness of environmental conditions in their areas. Data and analysis could also inform decision making related to the use of land and resources, community health and safety, economic opportunities, and cultural preservation.

Conclusion

EPA has prioritized enhancing performance in Indian country and has already implemented several measures to achieve this goal. The recommendations presented in this chapter support the agency's ongoing efforts in specific areas to sustain these improvements and ensure the protection of human and environmental health in Indian country.

Chapter 3: Assessment Framework

This chapter examines process indicators that will provide insights into the quality and efficiency of program implementation. Process assessment evaluates the methods and procedures used to achieve results, ensuring they are efficient and effective. By identifying process strengths and weaknesses, programs can make necessary adjustments to improve performance and increase the likelihood of achieving desired outcomes. This proactive approach helps pinpoint issues early, allowing for timely interventions and continuous improvement. Without understanding the process, outcome assessments may overlook critical factors influencing results, leading to incomplete or misleading conclusions.

Process assessment will also create insight into program activity levels. This aspect of process assessment is particularly important for DI because EPA does not have comprehensive, national-level information on program activities in Indian country. Creating this information is vital in EPA's efforts to improve DI. Assessment results will create a foundation for the Center and the agency to identify and compare activities across Regions, determine whether those activities align with statutory requirements, and assess whether adequate agency system supports are in place. It will also create a baseline understanding of the current state of data and information systems.¹ These systems are vital for the agency to identify and track outcomes by documenting current environmental and health conditions and recognizing changes over time. This data will allow EPA to determine the effectiveness of EPA's programs and activities and whether program processes are creating the desired environmental and health outcomes.

3.1 The Assessment Framework Creates Priorities within Categories

Assessment criteria fall into eight categories: authority, the universe, implementation procedures, data systems, metrics, resources, coordination, and continuous improvement. ("Universe" refers to EPA-regulated facilities, bodies of water, or other entities/activities that fall within EPA's regulatory authority.) These criteria correspond to data collected in the baseline survey and the Center's planning for future operations. Within each category, criteria are further divided by the following priorities:

¹ The Center of Excellence Direct Implementation Baseline Survey, described in Chapter 1, asked programs to identify needs for resources, including data and information systems. Responses will help agency officials prioritize improvements to close the gap.

ESSENTIAL

Denotes actionable items that programs should prioritize. The Center can use these criteria to characterize each program's operations and identify areas for improvement. Programs should be able to take steps to address any gaps, or they may need some level of Center assistance to address these criteria. For instance, programs should use, track, and make progress toward metrics covering all DI activities, use the findings to improve operations, and periodically revisit. To address any gaps, programs may benefit from connections to resources and a timeline for improvement.

RECOMMENDED

Denotes areas for improvement, referring to functions and capacities that would benefit program operations but are not critical. Programs may require Center assistance or coordination to improve on these criteria. Programs could consider these criteria when developing continuous improvement plans. For example, cross-referencing processes and procedures to guidance, internal policies, templates, checklists, and similar tools would simplify searches, save time, and help ensure staff access available tools.

**SYSTEM
IMPROVEMENT**

Denotes areas where improvement will require external systems adaptation or policy decisions. For example, many data system improvements will need assistance and coordination from OMS and other EPA offices. The Center would be well-situated to bridge any gaps in understanding between programs and other parts of the agency.

3.2 Eight Categories of Assessment Criteria Are Relevant to DI

Authority (Defined in Statutes and Regulations) and Guidance

These criteria address whether the program has identified statutory and established regulatory authority, maintained consistency between regions and headquarters, and ensured that policies and regulations provide adequate authority and flexibility for EPA to deliver the program requirements. This comprehensive assessment ensures that the program operates within legal boundaries, maintains uniformity in implementation, and has the necessary tools to function effectively and efficiently. Ultimately, these factors collectively impact the program's ability to achieve its goals, particularly in improving human health and environmental outcomes.

ESSENTIAL

1. The program has identified statutory/regulatory authority for DI.
2. Regions and HQ are consistent in carrying out those authorities.
3. Guidance and policies provide adequate scope, authority, and flexibility to operate effectively and efficiently and impact human health and environmental outcomes.

SYSTEM IMPROVEMENT

4. Statutes provide adequate scope and authority to operate effectively and efficiently and impact human health and environmental outcomes.
5. Regulations provide adequate scope and authority to operate effectively and efficiently and impact human health and environmental outcomes.

Universe

These criteria address whether processes covering all DI requirements exist and are fully implemented. Knowing the universe of conditions and regulated facilities is vital for comprehensive oversight and management. The program must also be able to track changes within this universe, such as identifying new facilities, to stay current and responsive to emerging needs. Tracking this universe in a national database ensures centralized, accessible, and consistent information. Finally, defining the universe in statute, regulation, or policy provides a clear legal framework, ensuring that all activities are grounded in authoritative guidance. Together, these criteria ensure the program's effectiveness, efficiency, and ability to impact human health and environmental outcomes positively.

ESSENTIAL

1. Processes covering all DI requirements exist.
2. All DI processes (covering all DI requirements) are fully carried out.
3. The universe of conditions and regulated facilities is known.
4. The program can track changes to the universe (for example, new facilities).
5. The universe is tracked in a national database.
6. The universe is defined in statute/regulation/policy.

Implementation Procedures

These criteria address whether guidance, internal policies, process descriptions, templates, checklists, and similar materials comprehensively describe all DI processes and implementation procedures. This includes defining the overall structure and flow of activities, setting standards for how activities should be carried out, and providing specific instructions for executing tasks.

These materials must be comprehensive, accessible, regularly reviewed, and implemented to ensure consistency and clarity.

Regular staff training on these materials is essential to maintain high standards and ensure everyone is updated with the latest procedures and policies. SOPs and internal procedures must be adequate to operate effectively and efficiently, ultimately having a positive impact on human health and environmental outcomes. These criteria ensure the program runs smoothly, adheres to best practices, and achieves its intended goals.

ESSENTIAL

1. Guidance, internal policy, process descriptions, templates, checklists, and similar materials describe all DI processes and implementation procedures, including:
 - processes that define the overall structure and flow of implementation activities,
 - standards (such as time, manner, and frequency) related to how all activities should be carried out,
 - procedures that provide specific instructions for executing activities.
2. Guidance, internal policies, process descriptions, templates, checklists, and similar materials are comprehensive, accessible, regularly reviewed, and implemented.
3. Staff receive regular training in guidance, internal policy, process descriptions, templates, checklists, and similar materials.
4. SOPs and internal procedures are adequate to operate effectively and efficiently and impact human health and environmental outcomes.

RECOMMENDED

5. Processes and procedures are cross-referenced to guidance, internal policies, templates, checklists, and similar tools.

SYSTEM IMPROVEMENT

6. Program requirements account for regional variation in Tribal legal, cultural, physical, and population characteristics.
7. Processes, standards, and procedures are nationally consistent for similarly situated Tribes, where “similarly situated” is a function of Tribal, physical, geographic, population, and other characteristics that determine the resources needed to conduct DI activities.
8. Implementation procedures for human health and environmental protection in Indian country are comparable to those provided under delegations to states and territories.
9. Outcomes are regularly evaluated to ensure the pursuit of consistency does not result in inequitable coverage.

Environmental and Health Data Systems

Programs' use of data systems may be constrained by availability; nonetheless, they can use their own methods to collect, update, and retrieve data. National and regional program offices should use the same data systems. If different systems are used, they should be easily combined or collated for display or download to ensure consistency and ease of data integration. Whatever system or systems they use, program staff need adequate access to retrieve data to support program functions effectively. A system should be in place to record and compile data consistently, enabling comparisons over time and across locations. Monitoring processes are essential to ensure data meets standards, and collected data should be publicly accessible to support transparency and program functions. Data systems must be robust enough to operate effectively and efficiently, positively impacting human health and environmental outcomes. Environmental and health data should capture the impact of DI activities, including baseline conditions, and be able to provide a national picture. Accuracy, location-specificity, comprehensiveness, retrievability, and analysis-readiness of data are all critical to support program functions adequately.

ESSENTIAL

1. National and Regional program offices use the same data systems. If not, they collect the same data in different systems that can be easily combined or collated for display or download.
2. Systems exist to collect and collate the universe of essential environmental and health data and information at the regional level.
3. Program staff can adequately access and retrieve program data, including data across multiple systems, to support program functions.

RECOMMENDED

4. Systems exist to collect and collate the universe of additional environmental and health data and information at the regional level.
5. A system exists to record and compile environmental and health data and information consistently enough to allow comparison over time and across places.
6. A process exists to monitor environmental and health data and information and check whether individual observations meet standards.
7. Collected environmental and health data and information--including data across multiple systems--are publicly accessible and adequate to support program functions.

SYSTEM IMPROVEMENT

8. Data systems are adequate to operate effectively and efficiently and impact human health and environmental outcomes.

9. Environmental and health data and information capture the impact of DI activity, including before- and after-baseline conditions.
10. Environmental and health data and information can be rolled up to provide a national picture.
11. Collected environmental and health data and information are accurate and adequate to support program functions.
12. Collected environmental and health data and information are location-specific and adequate to support program functions.
13. Collected environmental and health data and information are comprehensive and adequate to support program functions.
14. Collected environmental and health data and information are retrievable and adequate to support program functions.
15. Collected environmental and health data and information are analysis-ready and adequate to support program functions.

Metrics and Measures

Metrics should capture the level and quality of all essential DI activities, ensuring adherence to standards. Tracking these metrics nationally or regionally allows for comprehensive oversight, helps demonstrate the program's progress toward its goals, and provides insight into opportunities to implement improvements. This continuous feedback loop ensures that the program remains effective and efficient. National metrics tracking offers a unified view of performance, facilitating better decision making and resource allocation.

ESSENTIAL

1. The program has national or regional metrics.
2. National and regional metrics are SMART.
3. National or regional SMART metrics capture the level and quality of all essential DI activities (adherence to standards).
4. Metrics are tracked nationally or regionally.
5. Metrics show that the program is making progress toward its goals.
6. A process exists to review and analyze metrics and use the results to identify and enact improvements.

RECOMMENDED

7. Metrics are tracked nationally.

Human Resources/Staffing/Training

Human resources, staffing, and training are indicators of a program's capacity to carry out its mission. Enhancements to any of these resources would expand capacity, although needs are sure to vary across programs. The program should have strategies to address implementation gaps or resource constraints, ensuring continuous improvement.

ESSENTIAL

1. Training is adequate to operate effectively and efficiently and create positive human health and environmental outcomes.
2. FTEs are adequate to operate effectively and efficiently and impact human health and environmental outcomes.
3. The program has developed approaches to address program implementation gaps or resource constraints.

RECOMMENDED

4. Every office has FTE plans or a Human Resources assessment for their work.
5. The travel budget and administrative support are adequate to operate effectively and efficiently and impact human health and environmental outcomes.
6. Technology is adequate to operate effectively and efficiently and impact human health and environmental outcomes.
7. Contractual support is adequate to operate effectively and efficiently and impact human health and environmental outcomes.
8. Access to other resources adequate to operate effectively and efficiently and impact human health and environmental outcomes.

SYSTEM IMPROVEMENT

9. Program managers and resource allocators are aware of and take action on program gaps.

Communication and Coordination – Internal and External

Communication and coordination can also increase program capacity by providing needed information and eliminating duplicative steps, especially since EPA is not the only government agency that administers programs in Indian country. Coordination ensures that DI activities, reviews, decision making, and strategic planning are integrated and aligned across all levels and agencies. Effective communication protocols with Tribal governments and other entities, such as regulated pollution sources, non-governmental organizations, landowners, trustees, and educational institutions, are vital. These relationships ensure that DI activities are well-coordinated, transparent, and inclusive of all relevant stakeholders. Additionally, aligning DI

activities with ETEP/GAP cooperative agreements ensures that Tribes' priorities are reflected in the program's implementation. This comprehensive approach ensures that the program operates efficiently, addresses resource constraints, and positively impacts human health and environmental outcomes.

ESSENTIAL

1. Regional and National Program offices communicate and coordinate as needed with other federal agencies, states, localities, and Tribes regarding concurrence and soliciting comments.

RECOMMENDED

2. Regional and National Program offices communicate and coordinate as needed with other federal agencies, states, localities, and Tribes regarding DI activities, review, decision making, integrated strategic planning, announcements, and coordination, where appropriate.
3. Regions have relationships and communication protocols with Tribal governments regarding DI activities, review, decision making, integrated strategic planning, announcements, and coordination, where appropriate.
4. Regions have relationships and communication protocols with the following entities regarding DI activities, review, decision making, integrated strategic planning, and coordination, where appropriate:
 - regulated pollution sources,
 - non-governmental organizations,
 - Tribal members,
 - non-members,
 - landowners,
 - trustees,
 - Tribal colleges and universities, and
 - other organizations.
5. Regional and National Program offices communicate and coordinate as needed with each other regarding DI activities, review, decision making, integrated strategic planning, and (where appropriate) coordination.
6. DI activities are aligned with ETEP/GAP cooperative agreements, reflecting Tribes' priorities.

Continuous Improvement/Self-evaluation/Risk Management

Continuous improvement (CI) strategies emphasize both incremental and breakthrough advancements toward target outcomes. Programs develop their own CI plans, possibly working closely with the Center to identify and address gaps and ensure that plans are developed and implemented effectively. Risk management is another area where programs should develop their own plans and strategies, although some aspects of risk management are related to how programs fit together. Appropriate controls can ensure the program's stability and resilience.

Programs should establish and share best practices, contributing to a culture of continuous learning and improvement. Incorporating new tools and metrics into existing processes can enhance DI program capacity, making operations more efficient and effective. Communities of practice are vital for peer learning, sharing expertise, and providing examples of successful strategies. Promising practices related to Environmental Justice (EJ) implementation should be identified and integrated into the program. Tools to identify EJ concerns are crucial, and the program must act on the results of these tools to address any identified issues.

RECOMMENDED

1. Programs adopt continuous improvement strategies emphasizing incremental and breakthrough advancement toward target outcomes.
2. Working with the Center, programs identify and develop plans to address gaps.
3. Senior managers have identified, assessed, and developed appropriate controls to manage risks
4. Programs have best practices.
5. Programs contribute and access best practices.
6. DI program capacity is increased by incorporating new tools/metrics into existing processes.
7. Communities of practice allow for peer learning and sharing of expertise and examples.
8. The program has promising practices related to EJ implementation.
9. The program has one or more tools to identify EJ concerns.
10. The program has acted on EJ tool results.

3.3 Conclusion

The assessment framework presented in this chapter builds directly on the Center's Indian country DI baseline survey, conducted in 2024. The framework creates three priority levels. As a diagnostic tool, the framework will allow the Center and programs to identify where resources are most needed.

Chapter 4: Communications and Training Plan

4.1 Overview

The Center launched the Indian Country Direct Implementation Baseline Survey in March 2024. The survey asked respondents to provide information related to 30 questions. The results created baseline information needed for the Center to carry out its three charges: performance evaluation, continuous improvement, and managing data in a way that promotes reporting on DI nationally.

This communications and training plan can help the Center share baseline survey findings with stakeholders and provide programs with tools to incorporate them into their work. Several principles guided the development of this plan. First, information should be presented and calibrated based on understanding the audience's needs. By tailoring communication, Center staff can convey importance and suggest how the information can be used most effectively. The second principle is to avoid catching any officials by surprise, especially if the information is negative or needs context to interpret appropriately. When possible, staff and officials responsible for assessment findings should be able to prepare for that accounting. Third, communication and training should create opportunities for self-help, where possible. Program leaders and staff know best how to carry out their responsibilities and, with the appropriate tools, are best situated to make improvements. Fourth, interactions should emphasize that the purpose of assessment is to identify, plan for, and realize opportunities for improvement.

There are several ways to use survey analysis information to effect change. Programs may be able to make some changes themselves but may need to work with other EPA systems (such as data and performance measurement), higher-level leaders, or the Center to make improvements.

4.2 Stakeholders Have Varying Interests in DI Information

The Center should plan to communicate with multiple groups. The high-level message is the same—the Center is helping programs improve DI in an Indian country—but the emphasis and details vary. The extent of information shared should be tailored to each agency level and the sensitivity of the information being shared internally or publicly on the Center website.

Figure 2, below, lists the main stakeholders and the primary information they should receive.

Figure 2. Communication and Training Needs by Group

EPA Leadership Team, Tribal Program Managers, Regional Program Managers:	High-level findings Center milestones and progress
National Program Managers:	Program-specific findings Center milestone and progress
DI Program Leaders and Staff:	Program-specific findings Training on the use of self-administered tools Training on the development of continuous improvement plans
Key EPA Collaborators (OMS, OCFO, OCI) and Tribes:	Center milestone and progress

4.3 Center Staff Plan to Distribute Survey Findings by Program

Staff are shifting to dissemination activities as the Center finishes survey data collection and analysis. These activities are likely to proceed through the stages listed below. Although the stages are sequential, they are not discrete; as capacity allows, Center staff may be able to move forward on more than one activity at a time.

Summarize and Distribute Survey Findings

Create and disseminate one-page summaries of initial baseline survey results for each program.

Objectives:

- Demonstrate that survey submissions are being used and providing insights.
- Establish a starting point for follow-up work with programs.
- Provide programs with useful information to inform decision making.
- Lay the groundwork for the Kick-Off call.

Recommended Actions:

- Share program-specific one-pagers with respondents to check for factual discrepancies to ensure survey findings are presented accurately.
- Offer National Program Managers (NPMs) advance copies.
- Distill one-pagers into a PDF report that highlights the main summary findings. Deliver to stakeholders such as OITA, Regions, program offices, and EPA Administrators in preparation for the Phase 2 Kick-Off call.
- Use the transmittal to preview how the Center plans to engage with programs going forward and how this information fits into that engagement.

4.4 Several Programs Will Be Selected for an Initial Cohort to Receive Targeted Assistance

During FY 2025, Center staff expect to work closely with a small group of programs to develop a culture of continuous improvement. The Center will also develop and refine tools that multiple programs can use to self-assess and develop plans to close gaps. The steps below pertain only to cohort programs. The next section addresses ways to stay engaged with the other programs until they are selected for a subsequent cohort.

Conduct Phase 2 Kick-Off Calls

Launch outreach to programs selected for the first cohort of additional assistance.

Objectives:

- Set expectations for the Center’s engagement with each program and its plan for the coming year.
- Identify champions within each program or region.

Recommended Actions:

- Use Program Administrators’ preferred communication means for a kick-off call to announce Phase 2 of continuous improvement and program evaluations.
- Recruit program and region champions based on survey response quality and technical assistance priorities. Schedule one-on-one interviews or form a work group.
- In early FY 2025, participate in a national call with AAship (AA), Regional Administrators (RAs), and Deputy Regional Administrators (DRAs) to present survey findings and request their support for program engagement.

Identify and Collect Additional Information

Based on the assessment framework (Chapter Four of this document), identify and collect missing and additional information needed for program evaluations.

Objectives:

- Assemble information needed to complete program assessments.

Recommended Actions:

- Develop a checklist of all assessment standards, including those not collected in the baseline survey.
- Complete the checklist for each program.
- Send information needs to each program.
- Propose a meeting with one or more program officials to collect the missing and additional information but give them the option to submit the information in writing by a specific date.

Communicate Assessment Findings and Continuous Improvement Actions

Incorporating the additional information collected, complete and distribute program assessments, including continuous improvement actions identified through the evaluation process.

Objectives:

- Provide program evaluation findings to all relevant stakeholders in preparation for continuous improvement plan development.

Recommended Actions:

- Expand one-pagers to present full assessment results, including inconsistencies within programs.
- Offer National Program Managers advance copies
- Arrange with NPMs to present findings to higher-level officials.
- Craft language of program evaluation findings with DRAs and NPMs to communicate findings to program leaders and DI staff. Consider the sensitivity of the information being shared.
- Tailor relevant communication with alternative stakeholders outside of programs and leadership, such as OMS, OECA, OCI, Tribes, or agencies with whom EPA must achieve concurrence when necessary.

Assist Programs in Developing their Continuous Improvement Plans

Lead programs through the development of their continuous improvement plans.

Objectives:

- Help programs develop continuous improvement plans based on evaluation findings.

Recommended Actions:

- Identify individuals in each program to lead the plan development process.
- Provide or connect those individuals to training, as necessary.
- Facilitate problem-solving,
- Identify root causes of gaps and issues, and brainstorm actions to address them.
- Develop and share a template for action plan development and a process to collect action items.

Identify and Disseminate Best Practices

Compile best practices identified in the baseline survey, new program performance measures and metrics, and from implementation and oversight of numerous continuous improvement efforts.

Objectives:

- Expand the program staff capacity through knowledge sharing.

Recommended Actions:

- Work with programs and Regions to create training options that emphasize peer learning.
- Work with NPMs to develop an indexed and searchable repository of best practices that program staff can access and find materials promptly.
- Work with NPMs to build program capacity by establishing communities of practice that allow program staff to share best practices.

Integrate Tools and Strategies

Work with programs and Regions to integrate new tools and strategies into their processes, reinforcing the widespread benefits of continuous improvement.

Objectives:

- Develop a suite of tools that programs can use to adapt best practices for their own uses.

Recommended Actions:

- Incorporate DI themes into regional strategic plans, division operating plans, regional and national bowling chart metrics, and other reporting mechanisms so data and metrics are effectively and efficiently reported to NPMs, DRAs, and AAs to ensure data-driven decision making about DI in Indian country.
- Work with programs to integrate new tools and processes developed as a result of the Center's program evaluation and continuous improvement efforts into regular processes. Examples include:
 - policies,
 - SOPs,
 - templates, and
 - onboarding and training.

Recognize Success

Solidify improvements by recognizing and sharing success.

Objectives:

- Use extrinsic motivation to encourage participation.

Recommendation Action:

- Seek program input.
- Develop a plan to acknowledge and recognize successful efforts.

4.5 Center Staff Can Stay Engaged with Future Cohort Candidate Programs

While Center staff anticipate intensive contact and collaboration with cohort programs, they can remain in contact with other programs.

Objectives:

- Establish the Center's value as a resource and create confidence in the process.
- Raise awareness of DI program assessment and continuous improvement.
- Inspire self-administered program assessment and continuous improvement.

Recommended Actions:

- Communicate Center milestones and programs' successes through existing channels or a new means of communication, such as a periodic e-newsletter, town hall, or open house.
- Allow a limited number of non-cohort officials to attend training sessions.
- Provide access to tools and resources that programs can use without training.

4.6 Conclusion

The communications and training plan presented in this chapter provides a roadmap the Center can use to engage with programs during the next phase. The baseline survey created valuable information that the Center and program staff can use to assess activities and plan for improvement. Broad communication can reinforce the Center's value, while training can help programs incorporate new information into their operations.

Appendix 1. Panel of Academy Fellows and Study Team Biographies

Panel of Academy Fellows

Albert “Stan” Meiburg (Panel Chair): Stan Meiburg has had a distinguished career in environmental protection and sustainability. Since 2017, he has been the Director of Graduate Studies in Sustainability at Wake Forest University. Before this academic role, he was the Acting Deputy Administrator of the United States Environmental Protection Agency (EPA) from 2014 to 2017. Stan’s journey with EPA began much earlier. From 1996 to 2014, he was the Deputy Regional Administrator for Region 4. Before that, he held the same position in Region 6 from 1995 to 1996. His leadership in Region 6 also included his role as the Director of the Air, Pesticides, and Toxics Division from 1990 to 1995. In the late 1980s, Mr. Meiburg directed the Planning and Management Staff in the Office of Air Quality Planning and Standards, a position he held from 1985 to 1990. His earlier roles at EPA included serving as the Executive Assistant in the Office of the Deputy Administrator in 1984 and as a Program Analyst in the Program Evaluation Division from 1977 to 1984. Throughout his career, Mr. Meiburg has demonstrated a deep commitment to environmental protection and sustainability, making significant contributions to the field.

William “Bill” Leighty: Bill Leighty has had a remarkable career in public service and academia. Since 2017, he has been serving as the Senior Advisor to the Dean at the L. Douglas Wilder School of Government at Virginia Commonwealth University. In 2017, he played a crucial role in the passage of the Thomasina E. Jordan Indian Tribes of Virginia Federal Recognition Act. Before his current role, Mr. Leighty was a Professor of Practice at the School of Public and International Affairs at Virginia Tech from 2013 to 2017. He also directed the Government Performance Initiative at Virginia Commonwealth University from 2008 to 2013. From 2002 to 2007, Mr. Leighty served as the Chief of Staff to the Governor and Tribal Liaison in the Office of the Governor of the Commonwealth of Virginia. Before that, he was the Director of the Virginia Retirement System from 1995 to 2002 and the Department of Motor Vehicles Deputy Commissioner from 1991 to 1995. Mr. Leighty’s earlier roles include serving as the Deputy Secretary of Transportation in the Office of the Governor from 1986 to 1991, a Senior Economist and Analyst for the Senate Finance Committee from 1978 to 1980, and an Economist for the Department of Taxation from 1978 to 1980. Mr. Leighty has always demonstrated a strong commitment to public service and has significantly contributed to government performance and policy.

Michael Lipsky: Michael Lipsky has been involved in indigenous governance since 1998, when, as a Ford Foundation program officer, he helped start Honoring Nations, the Harvard University awards program dedicated to identifying and analyzing the best examples of Native American self-government. He continues to serve on the Honoring Nations board of governors, as well as on the advisory boards of the Native American Budget and Policy Institute, University of New Mexico; and the American Indian Governance and Policy Institute, University of Montana. From 2013 to 2018, Mr. Lipsky was a Distinguished Senior Fellow at Demos: A Network for Ideas and

Action, where he previously served as the Senior Program Director from 2003 to 2013. During this time, he also served as a Visiting Professor at the Public Policy Institute at Georgetown University from 2003 to 2008. Earlier in his career, Mr. Lipsky was a Senior Program Officer at The Ford Foundation from 1991 to 2003. His academic contributions include his award-winning book, *Street Level Bureaucracy* (1980, 2010), which continues to be a major influence in public administration studies world-wide.

Shelley Metzenbaum: Shelley Metzenbaum has dedicated her career to improving public management and performance. Since 2015, she has been the Principal of The BETTER Project, focusing on enhancing government effectiveness. Before this, she was the Founding President of The Volcker Alliance from 2013 to 2015, where she worked on strengthening public service. From 2009 to 2013, Ms. Metzenbaum was the Associate Director for Personnel & Performance at the United States Office of Management and Budget. Before that, she directed the Edward J. Collins Center for Public Management at the University of Massachusetts Boston McCormack School from 2008 to 2009. Her earlier roles include being the Executive Director of the Performance Measurement Project at the John F. Kennedy School of Government, Harvard University, from 1998 to 2001. She also served as the Associate Administrator for Regional Operations and State/Local Relations at the United States Environmental Protection Agency from 1993 to 1997. In the early 1990s, Ms. Metzenbaum was the Under Secretary at the Executive Office of Environmental Affairs for the Commonwealth of Massachusetts from 1990 to 1991. She also directed the Office of Capital Planning and Budgeting for the Commonwealth of Massachusetts from 1987 to 1990. Additionally, Ms. Metzenbaum has been involved with the Environmental Compliance Consortium. She has shared her expertise as a Visiting Professor and Senior Fellow at the School of Public Affairs, University of Maryland. Throughout her career, Ms. Metzenbaum's dedication to performance measurement and environmental affairs has greatly impacted the field of public service and management.

Alene Tchourumoff: Alene Tchourumoff has built an impressive public service and community development career. Since 2018, she has been serving as the Senior Vice President of the Center for Indian Country Development, Community Development, and Engagement Division at the Federal Reserve Bank of Minneapolis. Before this role, she was the Chair of the Metropolitan Council from 2017 to 2018. In 2016, Ms. Tchourumoff was appointed State Rail Director in the Office of Governor Mark Dayton. Before that, she worked as the Planning Director for Public Works in Hennepin County from 2013 to 2016. Her experience in consulting includes her role as Manager of Strategy and Operations at Deloitte Consulting from 2010 to 2012, and as Manager of the Transportation and Finance Practice at Infrastructure Management Group from 2007 to 2010. Ms. Tchourumoff's international experience includes her work as a Short-Term Consultant for Agricultural Development at the World Bank in China in 2006. She also served as a Program Officer and Project Manager for China Public Policy & HIV/AIDS Policy at the Harvard Kennedy School from 2002 to 2005. Earlier in her career, Ms. Tchourumoff was a Case Manager at the Asian American Civic Association from 2001 to 2002, an Equity Research Editor at China

International Capital Corporation from 2000 to 2001, and a Teaching Fellow with Princeton in Asia in Guangzhou from 1999 to 2000. Throughout her diverse career, Ms. Tchourumoff has demonstrated a strong commitment to public service, community development, and international policy.

Study Team

Nancy Y. Augustine, Ph.D., Project Director. Dr. Augustine joined the Academy in January 2019 and was named *Director of the Center for Intergovernmental Partnerships* in July 2021. Dr. Augustine has led studies for numerous federal agencies, including work for the Legislative Branch, the Department of Commerce Office of Inspector General, and the U.S. Merchant Marine Academy (DOT). She specializes in intergovernmental relations, public management, policy assessment, environmental and cultural resources protection, comprehensive and strategic planning, state and local fiscal issues, and planning for investments in facilities and infrastructure. In previous roles, she conducted research for the Department of Housing and Urban Development, the Department of Labor, the District of Columbia Auditor, and the Pew Charitable Trusts. Topics include affordable housing, housing finance policy, housing market trends, and state-level social support programs. She also worked in local government for ten years in long-range planning and policy development. Dr. Augustine has a Ph.D. in Public Policy and Public Administration from George Washington University and has taught at the Trachtenberg School (George Washington University) since 2006. She also has an M.A. in Economics from Georgetown University and a Master of Urban and Environmental Planning degree from the University of Virginia.

Jillian McGuffey, MPP, Research Analyst. Ms. McGuffey currently serves as a Research Analyst for the Strategic Initiatives Team. In this role, she conducts research for the Grand Challenges in Public Administration campaign, organizes and facilitates partnership events, and researches and produces studies required by Congressional statute or independently contracted with a public agency or private organization. Ms. McGuffey began working at the Academy in December 2020 after she completed an internship there, where she contributed to studies for the Office of Space Commerce and the National Park Service. Ms. McGuffey's focus areas include organizational management, agile management, housing policy, and social equity. Before working at the Academy, she interned at the United States Census Bureau's Criminal Justice Branch and USCIS's Emergency Management Division. Ms. McGuffey graduated from the University of Maryland with a Master of Public Policy degree after earning a Bachelor of Arts in Government and Politics and a Minor in Creative Writing.

Brad Riley, Ed.M, MPPA, Senior Research Associate. Mr. Riley is a Senior Research Associate with the Center for Intergovernmental Partnerships. He offers over 20 years of servant leadership in the public and nonprofit sectors, focusing on housing policy, social epidemiology, and advocacy for historically excluded populations. Brad is also known as Councilor Riley, serving as City Councilor At-Large for the City of Easthampton, Massachusetts. He serves as the Public Safety clerk and chairs the Appointment Committee, overseeing 200 citizen public administrators across 30 community boards and commissions. He also serves as a local government advisor to the

Governor of Massachusetts and is on the board of directors for the Massachusetts Municipal Association and Tapestry Health Systems. Brad graduated from the University of Illinois with a Master's in Education Policy and the University of Massachusetts with a Master's degree in Public Policy and Administration. He also has a Bachelor's degree in Workplace Diversity and Inclusion from the University of Massachusetts Amherst's University Without Walls and professional certifications in applied positive psychology, epidemiology, and diversity and equity.

Lizzie Alwan, MPPA, Senior Research Associate. Ms. Alwan has served on studies for numerous different federal agencies, including work for the United States Department of Agriculture Farm Production and Conservation Business Center. Ms. Alwan's focus areas include organizational transformation, change management, governance, and strategic planning. Ms. Alwan previously worked as an Academy intern on their second study with the United States Coast Guard Academy. Ms. Alwan earned a Master of Public Policy and Administration from the University of Massachusetts, Amherst.

Madison Bunger, Intern. Ms. Bunger is a rising junior at the University of Missouri-Columbia, majoring in Biology and Health Science Leadership and Policy. She interned with the Academy in the Summer 2024 semester.

Maddie Happ, Intern. Ms. Happ was a J.D. candidate at Wake Forest University School of Law. She provided legal research support in the Fall 2023 semester.

Kaitlyn Wilson, MPA, Intern. Ms. Wilson recently earned her Master's in Public Administration at the University of North Carolina Wilmington. She interned with the Academy during the Spring 2024 semester.

Appendix 2. List of Interviewees

Environmental Protection Agency

Headquarters

- **Jonathan Binder**, Tribal Program Manager, Office of Enforcement and Compliance Assurance
- **Pat Childers**, Tribal Program Manager, Office of Air and Radiation
- **Karen Gude**, National Tribal Program Coordinator, Office of Water
- **Elizabeth (Beth) Jackson**, Tribal Program Manager, Office of Information Management
- **Matthew (Matt) Kelly**, Program Lead for Facility Registry Service, Office of Information Management
- **Erika Wilson**, Tribal Consultation Advisor and Liaison, Office of Land and Emergency Management
- **Felicia Wright**, Deputy Director, American Indian Environmental Office

Tribal coordinators

- **Region 2**
- **Region 3**
- **Region 5**
- **Region 6**
- **Region 8**
- **Region 10**

Non-Agency Interviewees

Subject Matter Experts

- **Scott Cameron**, Vice Chairman Virginia State Water Control Board and former Acting Assistant Secretary for Policy, Management, and Budget, U.S. Department of Interior
- **Theresa (Teri) Gullo**, former Director of Budget Analysis, Congressional Budget Office
- **Felicia Marcus**, Strategic Advisor, Organizational Manager and Advisor, Environmental Consulting, Felicia Marcus & Co., Water Policy Group and William C. Landreth Fellow, Stanford University Water in the West Program, Stanford Woods Institute for the Environment

Appendix 3. Characteristics of Effective Performance Indicators

Performance indicators or measures are essential tools for assessing program effectiveness and efficiency. The Government Accountability Office (GAO) [describes performance measurement and measures](#) as:

“Performance measurement is the ongoing monitoring and reporting of program accomplishments, particularly progress toward pre-established goals. It is typically conducted by program or agency management.

“Performance measures may address the type or level of program activities conducted (process), the direct products and services delivered by a program (outputs), or the results of those products and services (outcomes).”

Performance measurement data describes program achievement, and program evaluation explains why those achievements were realized. Figures 3 and 4 describe indicators.

Figure 3. SMART Characteristics of Effective Performance Indicators



Simple: The definition should be clear and understandable to all stakeholders, including policy makers, program managers, and the public. To help ensure everyone interprets the data in the same way, straightforward language should be used and technical jargon avoided.



Measurable: It should be possible to collect data on the indicator consistently and reliably to allow for objective assessment and comparison over time.



Actionable: Indicators should inform decision making by highlighting areas where the program is performing well and where it needs improvement. Actionable indicators help guide resource allocation and program adjustments.



Relevant: The indicator should measure outcomes directly related to the program's goals and objectives and support the program's mission, while also relating specifically to the task at hand.



Timely: Data should be collected and reported frequently enough to allow for prompt decision making and adjustments in response to emerging issues or opportunities.

Figure 4. Additional Indicators



Realistic and attainable within the program's resources and timeframe: Setting achievable targets helps maintain motivation and credibility. Overly ambitious indicators may lead to frustration and disengagement.



Comparable over time and across different programs or regions: Standardized definitions and measurement methods help identify trends, best practices, and areas needing improvement.



Cost Effective: The benefits of having the information should outweigh the costs of collecting and analyzing it. Cost-effective indicators ensure that resources are used efficiently.



Sensitive: The indicator should be able to detect both improvements and declines in program performance. Sensitivity allows officials to calibrate responses appropriately.



Crowdsourced: Input from many sources should inform development. Involving stakeholders can provide valuable insights into what indicators are most meaningful and how they should be measured.



Ethically grounded: Data collection and reporting should be transparent and fair. Ethical indicators help maintain public trust and support for the program.