



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL



Protecting America's Waters

EPA Needs to Demonstrate Public Health Benefits of Drinking Water State Revolving Fund Projects

Report No. 15-P-0032

December 5, 2014



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Abbreviations

DWSRF	Drinking Water State Revolving Fund
EPA	U.S. Environmental Protection Agency
GPRA	Government Performance and Results Act of 1993
OIG	Office of Inspector General
PBR	Project and Benefits Reporting
PWSS	Public Water System Supervision
SDWA	Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System

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At a Glance

Why We Did This Review

We conducted this review to determine how the U.S. Environmental Protection Agency (EPA) and states demonstrate that completed Drinking Water State Revolving Fund (DWSRF) projects met project and program goals and contributed to improved drinking water quality and public health.

The 1996 Safe Drinking Water Act Amendments, in part, authorize the EPA to provide funding for capitalization grants to states to further public health objectives and promote efficient use of funds. The states use these funds to support low interest loans and other types of assistance to public water systems. The EPA conducts annual reviews encompassing certain aspects of the states' programs.

This report addresses the following EPA goals or cross-agency strategies:

- *Protecting America's waters.*
- *Protecting human health and the environment by enforcing laws and assuring compliance.*

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The full report is at: www.epa.gov/oig/reports/2014/20141205-15-P-0032.pdf

EPA Needs to Demonstrate Public Health Benefits of Drinking Water State Revolving Fund Projects

What We Found

The EPA does not obtain all required DWSRF project data from states, despite capitalization grants that require states to input key project information into EPA databases. The EPA also does not always use annual reviews of state DWSRF programs to assess project outcomes. Without this information the EPA cannot determine whether completed DWSRF projects contributed to improved drinking water quality and public health. In addition, the GPRA Modernization Act of 2010 (GPRA refers to the Government Performance and Results Act of 1993) requires all federal agencies to have long-term goals that are supported by interim performance indicators. The EPA requires states to systematically provide information that can be used to assess project results. However, not all states report complete, required information in every instance. Our analysis shows that systems that received DWSRF funding regain compliance, indicating public health improvements. However, incomplete reporting affects the overall value of our analysis of the DWSRF program. These incomplete data hamper the EPA's ability to evaluate program effectiveness and public health outcomes.

The EPA needs to enforce grant requirements for collecting DWSRF project information to demonstrate the public health results of the \$11.37 billion it has invested in drinking water infrastructure since 2009.

As a result, the EPA is unable to demonstrate the public health results of its large DWSRF agency expenditure, which represents about 10 percent of the agency's annual budget. Further, the EPA cannot demonstrate the overall success of DWSRF projects. The EPA is also missing an opportunity to capture potential best practices of state programs and projects.

Recommendations and Agency Corrective Actions

We recommend that the Assistant Administrator for Water enforce grant requirements that states input all necessary data in the project-level tracking database and review data completeness as part of the EPA's annual review of state performance. We also recommend that the EPA enhance coordination between DWSRF and Public Water System Supervision programs and periodically evaluate program results.

The agency agreed with our recommendations and provided corrective actions with milestone dates. The recommendations are resolved with corrective actions pending.



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

THE INSPECTOR GENERAL

December 5, 2014

MEMORANDUM

SUBJECT: EPA Needs to Demonstrate Public Health Benefits of
Drinking Water State Revolving Fund Projects
Report No. 15-P-0032

FROM: Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is placed to the right of the "FROM:" line.

TO: Ken Kopocis, Deputy Assistant Administrator
Office of Water

This is our report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The office responsible for implementing the recommendations included in this report is the Office of Water's Office of Ground Water and Drinking Water, Drinking Water Protection Division.

Action Required

The report recommendations are resolved with corrective actions pending. Therefore, the agency is not required to provide a final response to this report. However, if you choose to provide a final response, we will post your response on the OIG's public website, along with our memorandum commenting on your response. You should provide your response as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended.

We will post this report to our website at <http://www.epa.gov/oig>.

Table of Contents

Purpose	1
Background	1
Responsible Office	3
Scope and Methodology	3
Results of Review	4
<i>EPA Oversight of States Does Not Include Reviews of Long-Term Public Health Outcomes and Interim Indicators for DWSRF Projects</i>	4
<i>EPA and States Identified Ways to Demonstrate Public Health Benefits</i>	5
<i>Analysis Shows Systems Regained Compliance Which Indicates Public Health Improvements, But EPA Needs to Enhance Data Quality, Collection and Integration</i>	6
Conclusion	8
Recommendations	8
Agency Comments and OIG Evaluation	9
Status of Recommendations and Potential Monetary Benefits	10

Appendices

A Agency Response	11
B Distribution	14

Purpose

We conducted this review to determine how the U.S. Environmental Protection Agency (EPA) and states demonstrate that completed Drinking Water State Revolving Fund (DWSRF) projects met project and program goals and contributed to improved drinking water and public health.

Background

The 1996 Safe Drinking Water Act (SDWA) Amendments, in part, authorize the EPA to provide funding for capitalization grants to states. SDWA subsection 1452 (b)(3)(A)(i-iii) establishes priorities for the use of funds. The states use these funds to support low interest loans and other types of assistance to public water systems (e.g., construction of new or improvements to existing water treatment plants and other infrastructure). The SDWA requires the states, to the extent practicable, to prioritize their projects that: (1) address the most serious risk to human health, (2) are necessary to ensure compliance with the requirements of the SDWA, and (3) assist systems most in need according to state affordability criteria. The EPA conducts annual reviews encompassing certain aspects of the states' programs. According to the DWSRF Operations Manual, regions annually review and approve state Intended Use Plans/Project Priority Lists and evaluate state DWSRF program activity over the previous year. Specifically, the regions are required to evaluate the DWSRF programs' finances and operations, and check their compliance with relevant statutes, regulations and grant conditions. The regions also assess the states' progress and performance in achieving the goals and objectives identified in the states' Intended Use Plans and reported through the state's annual reports.

The EPA DWSRF capitalization grant agreements direct states to inform the EPA about project-level data on a quarterly basis. The EPA grant conditions require that each state DWSRF program provide public health protection results and progress in achieving program outputs and outcomes. Further, the GPRA Modernization Act of 2010 (GPRA refers to the 1993 Government Performance and Results Act) requires all federal agencies to have long-term goals that are supported by interim performance indicators. The EPA assesses drinking water quality through two national measures: (1) percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection, and, (2) percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection. According to the Office of Water, the EPA DWSRF program supports these national goals by demonstrating through Public Water System Supervision (PWSS) compliance monitoring that these systems are achieving drinking water standards captured by the EPA's Safe Drinking Water Information System (SDWIS).

The DWSRF program has comprised roughly 10 percent of the EPA's overall budget appropriation in recent years. According to the agency, the EPA started requiring states to report project-level information into a Project and Benefits Reporting (PBR) system in 2009. The EPA aggregates this information into the National Information Management System for reporting purposes. According to the DWSRF Operations Manual, state DWSRF programs must conduct final inspections to ensure that funded projects were used for eligible purposes and completed in accordance with original plan specifications. These programs manage project-level information through the PBR based on EPA grant reporting requirements.

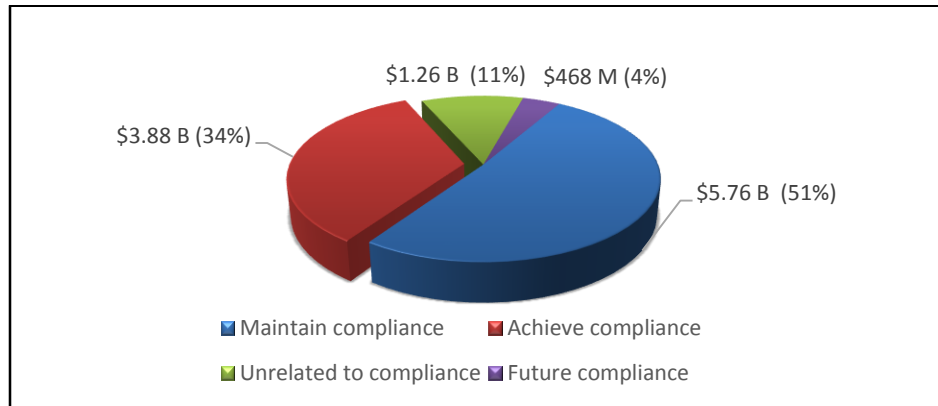
The PBR and National Information Management System databases identify four types of projects:

- Compliant systems receiving funds to maintain compliance.
- Noncompliant systems receiving funds to return to compliance.
- Compliant systems receiving funds for issues unrelated to compliance.
- Compliant systems receiving funds to meet future requirements.

From 2009 through 2013, 4,706 systems received \$11.37 billion in funding from state revolving funds. Using the EPA's four-part categorization scheme, this encompassed:

- 2,544 compliant systems receiving \$5.76 billion (51 percent of the total) to maintain compliance.
- 1,173 noncompliant systems receiving \$3.88 billion (34 percent of the total) to achieve compliance (higher risk).
- 856 compliant systems receiving \$1.26 billion (11 percent of the total) for issues unrelated to noncompliance.
- 133 compliant systems receiving \$468 million (4 percent of the total) to assist in obtaining future compliance.

Chart 1: \$11.37 billion spent on DWSRF projects ¹



Source: The EPA's PBR System.

Responsible Office

The EPA's Office of Groundwater and Drinking Water (OGWDW) is responsible for implementing the SDWA. This office's Drinking Water Protection Division oversees the implementation of the act by developing and helping implement national drinking water standards, overseeing and assisting funding of state drinking water programs and source water protection programs, helping small drinking water systems, protecting underground sources of drinking water, and providing information about drinking water quality to the public. The effort to improve public health protection for persons served by small drinking water systems (which account for more than 97 percent of public water systems in the United States) by strengthening the technical, managerial and financial capacity of those systems is an Agency Priority Goal for OGWDW.

Scope and Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We conducted our audit from November 2013 through August 2014.

To answer our objective, we identified relevant laws and guidance used by the DWSRF program. We interviewed and surveyed EPA headquarters and regional staff, and analyzed national data on DWSRF projects and compliance. We also selected a sample of DWSRF projects to assess compliance data after the projects were completed and interviewed selected state DWSRF staff in Region 3

¹ The portion of projects selected for our sample came from water systems that received 'Assistance to Achieve Compliance.' This portion is in red in the chart.

(Pennsylvania), Region 5 (Illinois) and Region 8 (Colorado and Wyoming) about specific projects in our sample.

Results of Review

The EPA does not obtain all required DWSRF project data from states. The EPA also does not always use annual reviews of state DWSRF programs to assess project outcomes. Without this information the EPA cannot determine whether completed DWSRF projects contributed to improved drinking water quality and public health.

The SDWA gives the EPA the authority to make capitalization grants to state programs to further public health objectives and promote efficient use of funds. To support these objectives, the EPA capitalization grants require states to input key project information into the PBR and the National Information Management System databases. In addition, the GPRA Modernization Act of 2010 requires all federal agencies to have long-term goals that are supported by interim performance indicators. The EPA requires states to systematically provide information that can be used to assess project results. However, not all states report complete, required information in every instance. Our analysis shows that after systems received DWSRF funding, they regained compliance which indicates public health improvements, however, incomplete reporting affects value of the analysis for the DWSRF program. These incomplete data hamper the EPA's ability to evaluate program effectiveness and public health outcomes.

As a result, the EPA is unable to demonstrate the public health results of this large agency expenditure. Further, the EPA cannot, in some cases, illustrate the overall success or challenges of specific DWSRF projects. The EPA is also missing an opportunity to capture and disseminate potential best practices of state programs and projects.

EPA Oversight of States Does Not Include Reviews of Long-Term Public Health Outcomes and Interim Indicators for DWSRF Projects

The EPA does not measure the results obtained from the projects funded by the DWSRF. The EPA does not use interim indicators, such as successful project completion nor long term outcome measures such as compliance information tracked in SDWIS. As a result, the DWSRF program is unable to demonstrate the public health results of these projects and in some cases, illustrate the overall success of the DWSRF program.

There is an opportunity to discuss and capture project outcomes during annual state/regional DWSRF program reviews and also at project completion. However, the EPA does not always take advantage of these opportunities. The DWSRF Program Operations Manual requires that each state DWSRF program submit an annual report to its EPA regional office detailing the state's performance and its

compliance with DWSRF regulations including capitalization grant requirements. The EPA grant conditions require that each state DWSRF program demonstrate progress in achieving outputs and outcomes. However, we found that EPA DWSRF regional staff do not always focus on project outcomes during annual reviews. Staff from one of the EPA regions shared that, during the annual review, there is limited consideration of public health benefits. These EPA regional staff explained that this may be due to the fact that health benefits are strongly considered up front. The EPA's annual review checklist directs regional staff to focus on grant and programmatic compliance issues along with financial and managerial compliance. According to headquarters staff, project outcomes may be discussed during the annual review, if appropriate. However this is not routine.

The EPA and states holding discussions about the public health benefits of projects during the annual review would be an important first step in measuring long term outcomes for the program. These discussions would enhance the EPA regions and states' ability to meet the requirements contained in the Operations Manual and grant conditions.

In addition to annual reviews, the EPA requires that state DWSRF programs conduct final inspections at project completion to determine whether funded projects were used for eligible purposes and completed in accordance with original plan specifications. However, the EPA does not have a corresponding requirement that the states enter the results of these inspections (or similar project completion information) into the PBR. This is a missed opportunity to capture individual project results for future analysis and program improvement. This information source could serve as a positive interim indicator for overall program success.

Further, according to the Office of Water, descriptions of DWSRF-financed projects could be more specific to include the compliance objective(s) to be addressed by the funding. This improvement in reporting would establish a clear connection between the funds and the public health outcomes that could be tested by examining the compliance monitoring results after the completion of the project's construction.

EPA and States Identified Ways to Demonstrate Public Health Benefits

We asked EPA headquarters and regional DWSRF staff to identify ways in which information might be collected to track whether projects contributed to improved drinking water quality and public health. Headquarters DWSRF staff suggested that we compare project level information in the PBR to compliance data in the Safe Drinking Water Information System (SDWIS). Nine of the 10 regions we surveyed suggested ways that data could be analyzed to track whether projects contributed to improved public health and water quality using data already available in the SDWIS and the PBR. Specifically,

- Four regions proposed combining information from the SDWIS and the PBR.
- Three regions proposed using the SDWIS database.
 - Two of these regions proposed assessing whether there are changes in water system compliance status.
 - One region proposed having the ability to generate summaries of DWSRF funding by water system.
- One region proposed that the PBR could be more user-friendly allowing for more data querying and reporting.
- One region proposed that tracking public health benefits of DWSRF projects should be discussed with key representatives who would be potentially impacted.

Staff from one state supported the idea of having a way to collect the environmental benefits of DWSRF projects. They further commented that involvement from their public water system departments would also be necessary, as those departments have more information.

Analysis Shows Systems Regained Compliance Which Indicates Public Health Improvements, But EPA Needs to Enhance Data Quality, Collection and Integration

We sampled the EPA data and public drinking water system information for the “Assist Non-Compliant Systems to Achieve Compliance” category for before and after project completion from 2009 through 2013. We chose this category because we expected that there would be a noticeable difference in system compliance before and after the DWSRF projects ended. Our results indicated that a large majority of projects and overall expenditures appear to have achieved positive results as measured by returning to compliance. However, these are not concrete conclusions because missing data in our sample, such as compliance period begin and end dates, may affect actual results. Given the limitations, we found:

- 347 of 370 systems (93.8 percent) had no reported violations after the project completion.
- 23 of 370 systems (6.2 percent) had reported violations after project completion.
 - 18 of those 23 systems had only reporting or monitoring violations where the system failed to file a monitoring report for a regulated contaminant (4.9 percent).
 - Five of those 23 systems had contaminant-related violations after project completion (1.4 percent).

These results show positive indications that the DWSRF project investments are beneficial, as the majority are achieving and maintaining compliance. Despite these positive indications, the EPA’s incomplete data hampers tracking of public

health outcomes. The following analysis showed several limitations that prevent a full evaluation of results, including:

- Required data fields in the PBR were incomplete. For example, out of our sample of 370 projects in the category of ‘assisting non-compliant systems to achieve compliance’, 172 (46 percent) were missing one or more data elements. Specifically, 29 projects did not have project start dates listed, and 36 projects were missing or did not have complete Public Water System identification numbers (unique identification numbers used for all public water systems).
- Compliance dates were missing in the SDWIS database. Records for 77 projects indicated noncompliance without a beginning date, and 169 projects indicated noncompliance, but did not have a date for returning to compliance. Of the 23 projects that had violations post-DWSRF funding, 14 had violations with no indication that they had returned to compliance (some violations may be ongoing and not yet reported).²

These data quality limitations show that states are not always compliant with EPA grant requirements. The EPA requires, per the capitalization grant agreements, that states enter project level data about proposed public health benefits, project begin and end dates, and system identification into the PBR. Our data review shows that states are not inputting all of this information. These data limitations prevented us from comprehensively evaluating DWSRF projects and hamper the EPA’s ability to evaluate overall DWSRF program effectiveness. As a result, the EPA is impeded in its ability to determine the extent to which expected results are achieved.

Additionally, we found that the EPA PWSS and DWSRF programs have not coordinated their respective databases to link compliance monitoring data to DWSRF project investment data. The EPA DWSRF headquarters program staff expressed that they would like to retrospectively review DWSRF projects, but due to oversight and management responsibilities, have not been able to do so. An Office of Water official stated that their office has compared DWSRF and PWSS data on a case-specific basis in the past, but could do this routinely if DWSRF and PWSS program datasets were linked.

By linking information in these systems, the agency then could assess compliance monitoring results after the completion of the project’s construction. Drawing the link between specific DWSRF investments in public water systems and their impact on particular communities is needed. The public needs to know how this large agency investment benefited the drinking water supply.

² The systems with missing data are counted in more than one missing value category.

According to Office of Water staff, the EPA is currently planning to consolidate DWSRF tracking systems to allow project level data to be aggregated to provide state and national financial reports. The EPA, while consolidating data systems, could use this as an opportunity to improve data collection and require certain data fields to incorporate tracking project public health results. The EPA would be able to determine the completed DWSRF projects that could potentially demonstrate public health outcomes.

Conclusion

After DWSRF projects are completed, nearly all water systems appear to be in compliance with health-based drinking water standards. While this is encouraging, currently the agency is unable to determine that completed DWSRF projects contribute to improved public health because of incomplete data and lack of data integration in the PBR and SDWIS databases.

The complexities of drinking water infrastructure improvements make it difficult for the EPA to confidently attribute completed DWSRF projects to improvement in public health. However, the EPA could track interim indicators, long-term public health impacts, and improve data quality, collection and integration for selected types of DWSRF-funded projects. The public needs to be informed of the extent to which this large agency investment benefits the drinking water supply.

The fact that the EPA is currently upgrading the SDWIS database and proposing to consolidate DWSRF tracking systems provides the agency a cost-effective opportunity to modify data systems to allow it to assess the feasibility of tracking project results. The EPA should take advantage of this opportunity to provide further assurance that state programs are meeting SDWA requirements. By doing so, the EPA could support states in identifying how DWSRF investments contributed to improved public health.

Recommendations

We recommend that the Assistant Administrator for Water:

1. Enforce the grant requirement for states to input all necessary data in the PBR database (e.g., project completion, project results, project start/end dates, compliance period begin/end dates, and public water system identification numbers).
2. Review state-level data entry to ensure data completeness in the PBR database as part of the EPA's annual review of state performance.
3. Implement the most cost-effective method to capture public health benefits by using information gathered in state annual reviews and enhancing coordination with compliance monitoring programs at the federal and state levels.

4. Periodically evaluate program results to ensure that program goals are being achieved at water systems receiving DWSRF financial assistance, and record successes, best practices and challenges to be shared among EPA regions and the states to focus and enhance program performance.

Agency Comments and OIG Evaluation

The Office of Water agreed with all recommendations and provided projected completion dates. Therefore, the recommendations are resolved with corrective actions pending. We also received technical comments from the Office of Water, which are incorporated into the report as appropriate. In its response, the Office of Water said that the data we reviewed for this report revealed a high indication of public health protection from DWSRF funds. While the results of our sample show positive indications, the EPA's incomplete data hampers tracking of public health outcomes. In addition, the EPA needs to systematically demonstrate how project results contribute to public health.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	8	Enforce the grant requirement for states to input all necessary data in the PBR database (e.g., project completion, project results, project start/end dates, compliance period begin/end dates, and public water system identification numbers).	O	Assistant Administrator for Water	4/30/15		
2	8	Review state-level data entry to ensure data completeness in the PBR database as part of the EPA's annual review of state performance.	O	Assistant Administrator for Water	12/31/14 ²		
3	8	Implement the most cost-effective method to capture public health benefits information by using information gathered in state annual reviews and enhancing coordination with compliance monitoring programs at the federal and state levels.	O	Assistant Administrator for Water	3/31/15		
4	9	Periodically evaluate program results to ensure that program goals are being achieved at water systems receiving DWSRF financial assistance and record successes, best practices and challenges to be shared among EPA regions and the states to focus and enhance program performance.	O	Assistant Administrator for Water	12/31/14		

- 1 O = Recommendation is open with agreed-to corrective actions pending.
 C = Recommendation is closed with all agreed-to actions completed.
 U = Recommendation is unresolved with resolution efforts in program.

- 2 While the Office of Water cited an earlier date in its response to the draft report, the Office of Water subsequently indicated it will not complete the action until December 31, 2014.

Agency Response

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report No. OPE-FY-0009, “EPA Needs to Demonstrate Public Health Benefits of Drinking Water State Revolving Fund Projects,” dated August 1, 2014

FROM: Kenneth J. Kopocis
Deputy Assistant Administrator

TO: Arthur A. Elkins, Jr.
Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. Following is a summary of the U.S. Environmental Protection Agency’s overall position, along with its position on each of the report recommendations. For the report recommendations, with which the EPA agrees, we have provided high-level intended corrective actions and estimated completion dates. We have also attached technical comments on the report for your consideration.

AGENCY’S OVERALL POSITION

The EPA’s Office of Water/Office of Ground Water and Drinking Water has worked to ensure public health benefits of the Drinking Water State Revolving Fund through integration with the Public Water System Supervision program. Both programs are driven to maximize the same internal measures established for the National Water Program in 1997:

- (1) The percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.
- (2) The percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection.

In 2006 the Director of the OW/OGWDW wrote a memorandum to Regional Water Division Directors indicating that coordination of the DWSRF and PWSS programs is essential to SDWA implementation and underscoring the importance of integrating these mutually-reinforcing programs. Available data examined for the subject draft report support that intended public health benefits are being achieved for consumers of water systems receiving DWSRF financial assistance. The Inspector General’s comparison of results of the DWSRF Project and Benefits Reporting System (PBR) and the Safe Drinking Water Information System (SDWIS) shows that 93.8 percent of water systems (347 of 370 systems) had no reported violations after DWSRF-

funded project completion. Additionally, of the 6.2 percent of systems with reported violations, only five systems (1.4 percent of the total) had violations due to the presence of contaminants. Notwithstanding this high indication of public health protection, the EPA agrees that more can be done to integrate the results of the two information systems. We are currently working on a pilot effort using FY 2013 data to complete a comparison of violations in SDWIS with project completion status in PBR (through electronic spreadsheet analysis) to integrate results without the expense of database modification.

AGENCY’S RESPONSE TO REPORT RECOMMENDATIONS

Agreements

No.	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion by FY
1	Enforce the grant requirement for states to input all necessary data in PBR (e.g., project completion, project results, project start/end dates, compliance period begin/end dates, and public water system identification numbers).	The OW/OGWDW agrees with the intent of this recommendation as a path to mutual data quality objectives, which we share with the IG. We take lack of reporting seriously and will work with Regions and states to ensure receipt in PBR of complete data for projects receiving DWSRF financial assistance as provided for in grant terms and conditions. To support complete data reporting, we will also be doing further analysis of data completeness in PBR.	The OW/OGWDW will provide Regions a report of completeness of required DWSRF project data beginning in April 2015 and quarterly thereafter. The Regions will be able to identify with states the actions needed for states to provide complete data for projects receiving DWSRF financial assistance and to oversee steps to accomplish complete reporting of required data. Where incomplete reporting of required data continues to be a problem, the OW/OGWDW will consult with the Region on taking appropriate corrective action.
2	Review state-level data entry to ensure data completeness in PBR as part of the EPA’s annual review of state performance.	The OW/OGWDW agrees with this recommendation and will provide guidance for the annual review process and checklist that includes checking on completeness of the states’ data reported in PBR for reviews in FY 2015.	September 2014.
3	Implement the most cost-effective method to capture public health benefit	The OW/OGWDW agrees with this recommendation and has initiated data integration of the	March 2015.

	information by using information required in state annual/biennial reports and enhancing coordination with compliance monitoring programs at the federal and state levels.	PBR and SDWIS data sets to identify completed projects receiving DWSRF financial assistance which were in violation after project completion. The OW/OGWDW will develop a regular report for use by Regions and states to document the public health results of the DWSRF financial assistance.	
4	Periodically evaluate program results to ensure that program goals are being achieved at water systems receiving DWSRF financial assistance and record successes, best practices and challenges to be shared among the EPA regions and the states to focus and enhance program performance.	The OW/OGWDW agrees with this recommendation. The OGWDW conducts an annual review of the program through the Regional offices' focused reviews of state program outputs for the prior year. OW/OGWDW will continue to evaluate program results and achievement of program goals as well as determine what actions are necessary to achieve results where needed. The reviews will also record successes, best practices and challenges to share among Regions and states.	December 2014 and annually thereafter.

CONTACT INFORMATION

If you have any questions regarding this response, please contact Charles Job, Chief of the Infrastructure Branch in the OW/OGWDW, at (202) 564-3941 or job.charles@epa.gov.

cc: Dan Engelberg
Carolyn Cooper
Marilyn Ramos

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