State Review Framework

Lessons From Round One and Moving Forward With Round Two

NACAA Meeting June 11, 2008

What did we learn from Round 1?

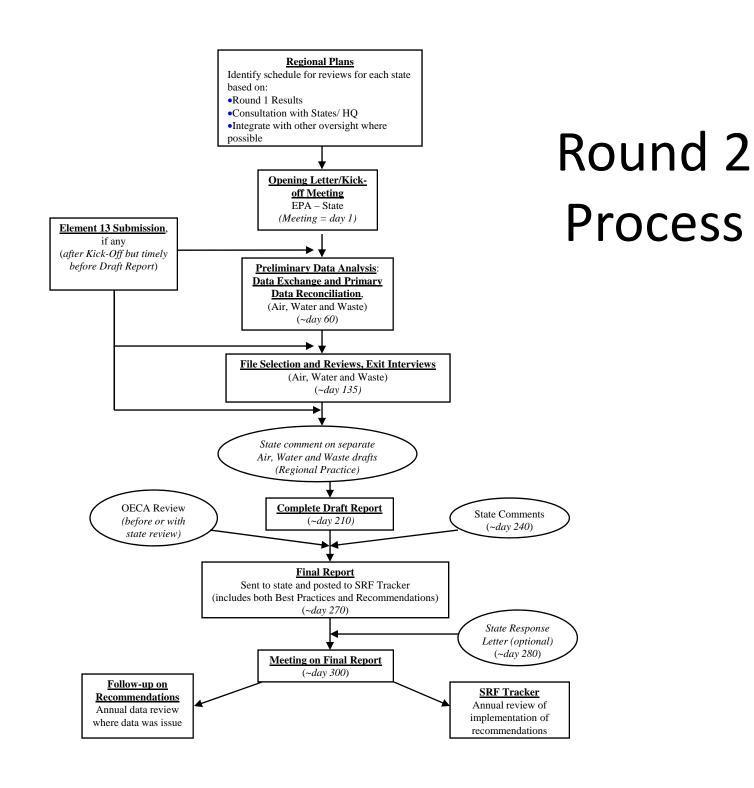
- Use round 1 as a baseline for future reviews
- Focus on recommendation implementation
- Improve consistency
- Standardize analysis and reports
- Increase communication and training

What did we learn from Round 1?

- Communicate expectations around national policies
- Four common issues:
 - Data entry and reporting
 - SNC/HPV identification
 - Timely enforcement
 - Penalties

What did we learn from Round 1?

- Include Best Practices
- Align with other oversight where possible
- Do not use differential oversight to rank or grade states
- 3 year cycle is not enough



Changes From Round 1

- Elements
- Data Metrics
- Process and reports
- Local Agency Guidance
 - Local agencies considered in SRF reports either separately or as contributor to state performance
 - Relationship to EPA and size of regulated universe are factors in decision
 - Encourages consultation
 - Decisions documented in report

Training

- Training at meetings of the state media associations (NACAA 3 hour training tomorrow)
- General training for each region at the regional office
 - States within each region are invited to participate
- Senior management training and discussion at RA/DRA/OECA AA and State Commissioner level
- Focused training on specific parts of the SRF process where consistency is important
 - Training on the Preliminary Data Analysis is in early October

Training

- Focused training will also be provided for:
 - The File Review process;
 - Report writing and generation; and
 - Use of the SRF Tracker.
- Webinars will be made available to states that can not attend training
- Webinars will also be available throughout the 4 year cycle.
- Refreshers will be available on-line through NETI

Consistency: Where is it Important?

Process:

- General process should include similar key steps but every step does not need to be identical
- Collaborative process
- Use of national policy/guidance as standards
- Use of data and file review metrics
- File selection methodology
- Generation of report that follows formats
- State review of and input into draft reports
- Identification of findings and recommendations
- Track and manage implementation of recommendations
- Minimum qualifications of reviewers

Consistency: Where is it Important?

Across Media:

- Assume consistency across media, but take program differences into consideration
- Key steps in general process should be similar across media
- Decisions and judgments based on consistent criteria

Consistency: Where is it Important?

Reporting:

- Consistent format/common sections
 - General introductory information
 - Status of recommendations from round 1
 - Data Metrics pull/documentation of data discrepancies
 - Preliminary data analysis
 - File selection
 - File reviews, including file review metrics
 - Findings
 - Areas of concern and significant recommendations
 - Executive Summary
- Must be able to determine performance from report

Integration of CMS Evaluations and SRF Reviews

- These reviews will now be integrated into one
- Additional information in the introductory section:
 - Organizational structure
 - Relationship to local agencies/regional offices
 - How covered in the review
 - Resources
 - Training
- Additional data metrics; information covered in file reviews

Implementation of Round 2

- Regional Plans:
 - Schedule for conducting reviews across the 4-year cycle
 - Due to OECA by June 30
 - States should be consulted in their development
- Kick-off letter initiating the first review
- Data pull for each media for first state completed and sent to the state for review to ensure accuracy
- PDA training in early October for regions
- All state reviews completed by the end of FY2012