

# FRAMEWORK FOR DEVELOPING AND USING PERFORMANCE INDICATORS FOR ENVIRONMENTAL COMPLIANCE AND ENFORCEMENT PROGRAMS

## I. Identifying Better Indicators

- 1) Establish/refine program goals and objectives
  1. National program
  2. Specific initiative
- 2) Develop definitions for types of measures
- 3) Conduct meetings with external stakeholders and internal staff to solicit:
  1. Potential performance measures
  2. Criteria for evaluating potential measures
  3. Principles to guide the overall effort to develop and use indicators

## II. Designing and Implementing Better Indicators

- 4) Select final measures using the criteria
- 5) Establish internal work teams to:
  1. define measures in more detail
  2. review relevant data in existing systems
  3. develop new information collection and reporting processes as needed
  4. establish a schedule for implementing and testing indicators
- 6) Conduct pilot projects to test indicators and correct problems
- 7) Use outside consultants as needed to resolve technical and methodological issues
- 8) Execute the implementation in phases

## III. Using Better Performance Indicators

- 9) Report to external audiences
  1. annual performance reports to legislative bodies, central budget authorities, public
- 10) Understand and improve performance
  1. monthly reports to program managers about progress on key outcomes
  2. quarterly discussions with regional and district managers
  3. in-depth performance analyses of selected programs
- 11) Evaluate use of individual measures and identify measurement gaps

### Measures Definitions

- *Output* - quantitative or qualitative measures of activities, work products, or actions
- *Intermediate Outcome* - changes in knowledge, behavior, or conditions that result from program activities. Changes associated with, or needed to achieve the end outcome.
- *End Outcome* - The ultimate outcome of program activities as compared to the intended purposes

of the activities

## **Criteria for Evaluating Performance Indicators**

- *Relevant* - to agency goals, objectives, and priorities; and the needs of external stakeholders
- *Transparent* - promotes understanding of program performance
- *Credible* - based on data that is complete and accurate
- *Functional* - encourages constructive behavior
- *Feasible* - value to the program outweighs cost of implementation and maintenance
- *Comprehensive* - covers important operational aspects of program performance

## **Performance Indicator Development Principles**

- Consult a broad array of stakeholders and address their needs
- Combination of outputs and outcomes need to be measured
- Indicators should be linked to goals and objectives
- Recognize outcomes are influenced by external factors
- Indicators should help evaluate progress in addressing environmental problems
- Indicators should be used to both report results to the public and manage programs

## **EPA Performance Measures**

- Pounds of pollutants reduced by enforcement actions
- Pounds of soil treated or removed, gallons of groundwater treated
- Number of companies/facilities self-disclosing violations under EPA policies
- Number of entities seeking assistance from EPA centers
- Percentage of enforcement cases requiring improvements in facility management of pollution
- Statistically valid compliance rates

## **Monthly Management Reports**

- Administrative Penalty Order Report
- Civil Referrals Report
- Judicial Conclusions Report
- Administrative and Judicial Penalty Report
- Administrative and Judicial Injunctive Relief Report
- Percentage of Settlements with SEPs
- Direct Environmental Benefits Report
- Outcomes and Settlements with Injunctive Relief

## **Regional Office Reports**

- Include data and trend information on regional:
  - Inspections
  - Enforcement Activity
  - Outcomes achieved
- Regional performance is compared to: other regions, national averages, and historical performance
- Performance issues identified for management attention