

EVALUATION AT EPA:

Determinants of the Environmental Protection Agency's Capacity to Supply Program Evaluation

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SUMMARY *Since the inception of the U.S. Environmental Protection Agency (EPA), considerable emphasis has been placed on the use of prospective policy analysis tools that aim to inform environmental decisions, including cost-benefit analysis and risk assessment. However, compared to the prevalence of ex ante analysis at the EPA to inform decisions, relatively little evaluation of these same environmental policies is conducted after implementation, to inform future policy development or to modify existing policies.*

This research considered processes and determinants that affect evaluation supply at the EPA. The research relied on archival documents, semi-structured interviews, and case studies of EPA's ambient air, hazardous waste, and performance partnership programs. Ten key factors were identified across the three case studies that constituted both barriers to and facilitators of evaluation. This research concludes that evaluation has much to offer EPA decision-makers, and efforts to improve evaluation capacity will present organizational learning opportunities that can further support the agency's evidence-building practices, specifically improving the application and use of program evaluation at EPA.

While considerable effort and resources are deployed by the Environmental Protection Agency (EPA) in analyzing the predicted effects of regulatory and policy decisions for environmental policy, EPA's use of program evaluation during and after regulatory implementation is limited. Utilizing case studies of three major EPA programs, archival documents, and interviews with EPA staff, state staff, and stakeholders, a detailed history of EPA's central evaluation capacity was developed and ten determinants of evaluation supply were identified as relevant for affecting EPA's evaluation capacity.

tral evaluation function suggests the importance of decentralized capacity in sustaining evaluation activities at EPA.

EVALUATION WITHIN EPA PROGRAMS

Evaluation capacity at EPA also occurs within individual programs, through a decentralized approach. This research examined three EPA programs' experiences developing evaluations, considering each program through an Evaluation Capacity Inventory. Across the three programs, the hazardous waste program completed numerous evaluations, while the ambient air quality and performance partnership programs completed relatively few evaluations. For the hazardous waste program, the evaluation culture was largely shaped by a political appointee in the 1990s, who recognized a shift in program direction was needed after the program's initial, major regulations were completed. Today, the program was observed to be capable of producing evaluation and using results. In contrast, the ambient air and performance partnership programs both exhibit gaps in the evaluation capacity inventory. For the ambient air quality program, challenges technically completing evaluations and in identifying likely users were identified, and even if produced, the results may not influence decisions based on existing statutory interpretations. The performance partnership program faced a different challenge, clearly articulating the goal of the program, which currently varies by state.

Based on the experiences of the three case studies described above, ten factors that affect EPA's capacity to supply program evaluations were identified. First, the **political environment** provides context about public attitudes and

CENTRALIZED EVALUATION AT EPA

EPA's central evaluation capacity experienced intermittent attention during the agency's 40 year history. From the 1970s to 1995, the evaluation office provided collaborative advice to agency programs. From 1995 to 2000, as EPA worked to implement the Government Performance and Results Act (GPRA) and due to cultural resistance, the central evaluation office was terminated. In 2000, a new evaluation office was established, designed to collaborate with program offices in producing evaluations. EPA developed a successful competition, through which numerous programs received additional funding and evaluation contracting support to develop program evaluations, many for the first time, and to receive support in utilizing the findings and recommendations for program improvement. In 2013, the evaluation office was largely de-prioritized by the agency with the majority of staff activities shifted toward business efficiency studies. The episodic nature of the cen-

Evaluation Capacity Inventories for EPA Programs

Inventory Criteria	Hazardous Waste	Ambient Air Quality	Performance Partnerships
<i>Evaluation Capacity Inventory:</i>			
Is the program significant enough to merit evaluation?	✓	✓	✓
Are the program goals clear?.....	✓	✓	×
Can the results of evaluation influence decisions about the program?.....	✓	?	✓
Are intended evaluation users and uses well-defined?...	✓	×	✓
Can an evaluation technically be completed?	✓	×	✓

perceptions, and interactions with other governmental institutions and the political process. Second, **program culture** reflects contextual characteristics of agency staff and bureaucratic structures. Third, **motivation**, or the impetus to conduct evaluations, addresses the encouragement to produce evaluation for learning or accountability purposes. Fourth, **leadership** reflects the role of managers and political appointees in encouraging, or discouraging, evaluation production. Importantly, leadership provides a critical aspect of demand for evaluation production, as well as some control over program resources and processes. Fifth, a **legal** factor relates to EPA's interpretation of statutory authority and dynamics that emerge from challenges to that interpretation. Sixth, **perceptions of the utility** of evaluation address how individuals and programs identify potential usefulness of the resource in meeting program needs. Seventh, the **program design** factor addresses program protocols, processes and structures that can help a program achieve desired goals. The final three factors include technical aspects of evaluation production: **resources**, **methods**, and **data**, each necessary to technically complete an evaluation.

The first two factors represent important context that must be addressed for capacity (or individual evaluations) to develop and be maintained at EPA. The next five factors identified represent a group of issues that affect the impetus for conducting evaluation in the first place. The final three factors represent the more traditionally emphasized aspects of evaluation capacity, the technical capability to produce evaluation; in this research these factors were not identified as critical initial aspects of developing and maintaining the capacity to produce evaluations. For EPA, the impetus factors could sometimes inhibit evaluation altogether, whereas the technical factors were solvable once a decision was made to proceed with evaluation. This observation suggests emphasis on the impetus for evaluation is a valuable starting point to build capacity at EPA.

A PATH FORWARD FOR EPA

Given the diverse factors that affect evaluation capacity, each EPA program must identify a strategic path that addresses stakeholder needs, legal dynamics, perceptions, and

unique program designs. Five opportunities are identified for EPA's path forward in building evaluation capacity:

#1: Utilize Centralized and Decentralized Capacity.

Multiple levels of evaluation experience can provide reinforcing expertise and culture to sustain capacity, persisting across political appointees and changes in agency priorities.

#2: Identify Gaps Using Capacity Inventories.

Recognizing not all EPA programs may be well-suited to evaluation, development of capacity inventories will help EPA staff prioritize efforts, and may also help identify where decentralized capacity can be most productively expanded.

#3: Incentivize Evaluation Within Existing Processes.

Internal EPA incentives for programs to pursue evaluation, such as an evaluation competition, were identified as strong facilitators of evaluation. Exploring additional opportunities to create internal incentives with managers and staff may be exceedingly productive, while avoiding evaluation mandates that employees view skeptically.

#4: Employ Participatory Evaluation to Align with Existing Collaborative Practices.

Given EPA's familiarity with involving stakeholders in providing feedback on prospective analyses and draft rules, a possible extension is to also solicit stakeholder feedback for evaluation through participatory designs to mitigate concerns about less than favorable findings, and to maximize usefulness. A participatory approach may also help address concerns that evaluation can serve multiple purposes, including both accountability and learning.

#5: Learn by Doing.

Learning about evaluation implementation takes time. Developing the appropriate strategies and capacity to evaluate today's policies and programs will only benefit the agency in doing so in the future and with appropriate encouragements from stakeholders and policy-makers. Thus, evaluation has much to offer EPA decision-makers, if given a chance.

REFERENCE

- Hart, N. 2016. Evaluation at EPA: Determinants of the Environmental Protection Agency's Capacity to Supply Program Evaluation. Dissertation. Washington, D.C.: George Washington University.

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