

**“How To” Guide for Compliance Assistance Reporting**  
**within the**  
**Compliance Assistance Module of the Integrated Compliance Information System (ICIS)**

Working Draft – 9/13/10 – Working Draft

This ‘How To’ guide was developed by a working group consisting of regional compliance assistance coordinators (CAC) and headquarters OECA/CASPD compliance assistance staff. It is based on various national policy memos and guidance dating back to the initial CA ICIS guide in 2005. For a complete list of policy memos, refer to

<http://intranet.epa.gov/oeca/oc/caspd/cacoordinators/reporting/index.html> and the ICIS Policy on Demand (IPOD) via Lotus Notes.

IPOD can be opened by using the following instructions:

1. Open Lotus Notes
2. From the Lotus Notes toolbar select File --> Open --> Lotus Notes Application
3. In the Open Application pop-up box that appears, scroll down the "Look in:" scroll bar and select DCAPPS3/DC/USEPA/US
4. Double click on the "oeca" folder to open the folder
5. Double click on the "IPODp2" application to open the application

**A list of Compliance Assistance Coordinators (CACs) is located at [http://www.epa.gov/compliance/contact/cac\\_regional.html](http://www.epa.gov/compliance/contact/cac_regional.html) and at the end of this Guide.**

**Throughout this document compliance assistance is referred to as “CA.”**

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## Data Certification Periods Mid-Year & End-of-Year

During mid-year and end-of-year, Regional management (e.g. Regional and Deputy Regional Administrators) certify that: all compliance assistance (CA) activities for their region are entered into ICIS and that all data, including measurement, is accurate and entered correctly. Mid-year certification takes place in April and end-of-year certification takes place in October. Refer to the Measurement Section in this “How To” Guide for Government Performance Results Act (GPRA) measurement requirements at certification periods.

During mid-year and end-of-year certification, regional management is specifically certifying that:

- 1) The mid or end-of-year enforcement/compliance data being submitted is complete and accurate both as entered into the national databases of record and the end-of-year workbook;
- 2) The Region, Office, or Division agrees with Office of Compliance’s final data pull numbers, except where it has populated an alternative (substitute) number that the Region, Office or Division certifies is correct; and
- 3) All data has been compiled in accordance with current OECA guidance.

## Common Definitions

(Note, the following are not in alphabetical order. They are listed in order of logical flow.)

**COMPLIANCE ASSISTANCE (CA):** from the *2005 Guidance Addendum for Reporting Compliance Assistance in the Integrated Compliance Information System* – March 2005.

“To be categorized as CA activity, at least one objective must be related to achieving or advancing regulatory compliance. CA includes activities, tools, or technical assistance which provided clear and consistent information for: 1) helping the regulated community understand and meet its obligations pursuant to environmental regulations; or 2) helping assistance providers aid the regulated community in complying with environmental regulations. CA may also help the regulated community find cost-

effective ways to comply with regulations and/or go ‘beyond compliance’ through the use of pollution prevention, environmental management practices and innovative technologies, thus improving their environmental performance. Thus, activities undertaken in ‘voluntary’ environmental programs such as ‘Green Buildings,’ which have no regulatory basis, are generally not considered compliance assistance. However, there may be instances when the activity also includes information on regulatory compliance and can be counted as compliance assistance. For example, developing a brochure to promote ‘green building’ practices (e.g. roof top gardens, use of solar or thermal heating systems, etc.) into new construction would not be CA. On the other hand, if the brochure also includes information on ways to control storm water runoff during construction that will meet or exceed regulatory requirements, then it can be counted as CA.”

**REGULATORY HOOK:** Compliance assistance requires explicitly stated EPA federal regulatory reference. The definition of CA states that “at least one objective of the activity must be related to achieving or advancing regulatory compliance.” This means that to be considered CA, the activity needs to directly and explicitly educate the recipient about the requirements of a federal regulation and the actions that are required in order to comply. Furthermore, since we are the Environmental Protection Agency, we define CA federal hook as meaning an EPA federal regulation. If the CA activity focuses on the Endangered Species Act, for example, this law is administered by the Fish & Wildlife Service, not the EPA, and would not be considered a CA federal regulatory hook. If the CA activity focuses on local or state issues with no discussion of an EPA federal requirement, it would not be considered CA and would not be entered into the CA module of ICIS.

NOTE: When the region has delegation and oversight authority over the state this could be considered a federal regulatory hook. For example: the region provides CA to a landfill because the state lacks resources to do so. To be counted as CA, the activity must explicitly address the RCRA subtitle D.

**DIRECT COMPLIANCE ASSISTANCE:** Think of this as CA you provide directly to a person. They are sitting in the room with you or they are on the phone talking to you. You are directly providing CA. Whereas other forms of CA could be indirect, such as a mass mailing or tool development.

**ENTITIES REACHED:** This field refers to the number of people (i.e. regulated entities, environmental assistance providers, or members of the general public) that your CA activity reached. There are required “one-to-one” ratios for entities reached for the following CA activity types: RESPONSE TO INQUIRY, FACILITY VISIT, FACILITY REVISIT, and ON GOING FACILITY SPECIFIC WORK. See table below for how to count entities reached for each activity type.

**ACTIVITY QUANTITY:** This field refers to the number of same type of CA activities conducted in a given period of time. The given period of time is stated in the Start Date and Completion Date fields in the middle of the page. Refer to “Aggregation of Data” section.. Due to national measurement analysis, you are not allowed to enter more than one (1) Activity Quantity for the following CA activity types: FACILITY VISIT, FACILITY REVISIT, WORKSHOP/TRAINING, and ON GOING FACILITY SPECIFIC WORK. Refer to “Aggregation of Data” section below.

**ONE-TO-ONE RATIO:** For program management and consistency in aggregation of CA data, the Entities Reached and the Activity Quantity fields must be equal for the following CA activity types: RESPONSE TO INQUIRY, FACILITY VISIT, FACILITY REVISIT, and ON GOING FACILITY SPECIFIC WORK. The reasoning is these activity types are typically situations where you are helping one entity at a time. For example, where you visit a site for CA (not inspection) and meet with more than one facility person, the visit is outreach to one regulated entity, the facility. These visits are viewed as outreach to one location, one facility, regardless of how many facility people are along for the CA site visit.

**AGGREGATION OF DATA:** It is allowable to enter more than one Activity Quantity for the following CA activity types: RESPONSE TO INQUIRIES (\*), OUTREACH DISTRIBUTED - TARGETED, OUTREACH DISTRIBUTED - PUBLIC, TOOLS DEVELOPED, PRESENTATION/MEETING, TARGETED OUTREACH - WEB. Due to national measurement analysis, you are not allowed to enter more than one Activity Quantity for the following CA activity types: FACILITY VISIT (\*), FACILITY REVISIT (\*), WORKSHOP/TRAINING (\*), and ON GOING FACILITY SPECIFIC WORK (\*). See Aggregation of Data section on page 24.

(\*) Remember these are also ‘One-to-One’ ratios.

**ACTIVITY TYPES:** There are ten (10) CA activity categories, they are: RESPONSE TO INQUIRY, FACILITY VISIT, FACILITY REVISIT, ON GOING FACILITY SPECIFIC WORK, OUTREACH DISTRIBUTED - TARGETED, OUTREACH DISTRIBUTED - PUBLIC, TOOLS DEVELOPED, PRESENTATION/MEETING, WORKSHOP/TRAINING, and TARGETED OUTREACH - WEB. A description for each can be found in this “how to” guide at the beginning of its corresponding section.

**KEY REPORTING TIPS FOR EACH ACTIVITY TYPE:**

<b>Activity Type</b>	<b>1:1 Ratio Required?</b>	<b>One per Record Required? (No Aggregation)</b>	<b>Aggregation of Data Allowed?</b>	<b>Entities Reached Description</b>
Response to Inquiry	yes	no	yes	Entities reached are based on the number of inquiries. (E.g., regulated entities, or environmental assistance providers) <ul style="list-style-type: none"> <li>▪ Typically there will be one phone or email request; entities reached = 1</li> <li>▪ One phone call where there are five people listening in on the call: Entities Reached = 1, Activity Quantity = 1</li> <li>▪ It is not necessary to track the name of the entity making the inquiry.</li> </ul>
Facility Visit	yes	yes	no	Entities reached are based on the number of regulated facilities visited.
Facility Re-Visit	yes	yes	no	Same as Facility Visit.
On-Going Facility Specific Work	yes	yes	no	Entities reached are based on the number of regulated entities included in ongoing facility specific work. One record combines a number of activities (site visits, meetings, response to inquiries, etc.) at the same facility over a fiscal year. All activities conducted for one facility should be reported as: Entities Reached = 1, Activity Quantity = 1
Outreach Distributed – Targeted	no	no	yes	Regulated entities reached are based on the number of unique addresses to which the CA material is sent. Entities Reached = number of regulated entities receiving the mailing, Activity Quantity = number of different outreach materials.
Outreach Distributed - Public	no	no	yes	Same as Outreach Distributed –Targeted. The only difference is this category is for outreach to the general public.
Tools Developed	no	no	yes	Entities reached are not reported for tools developed.
Presentations/ Meetings	no	no	yes	Entities reached are based on the number of individual people in attendance, regulated entities or EAPs. Entities Reached = number of people present, Activity Quantity = number of presentations.
Workshop/Training	no	yes	no	Same as Presentations/Meetings
Targeted Outreach - Web	no	no	yes	Entities reached are based on the total number of web hits Entities Reached = number of downloads for all URLs, Activity Quantity = number of unique URLs that contain CA rich material.

**NON-OECA REPORTING:** CA activities can include program data outside the OECA reporting realm (e.g. pollution prevention programs with a regulatory hook reported to OPPTS, for example). It does not matter which HQ office your Regional program reports to, all CA activities must be entered into the CA module of ICIS. It is not viewed as double counting in any other Agency data reporting system or priority if you also report to an Office other than OECA because ICIS is the only database of record for EPA CA activities; they are not captured elsewhere. Using ICIS to record CA efforts will increase your program’s visibility and allow for a mechanism to track valuable efforts – including Federal Facility work, and, in some cases, National Priority work.

**OECA CORE PROGRAM:** This refers to those Office of Enforcement & Compliance Assurance (OECA) programs that are not national enforcement initiatives.

**MEDIA PROGRAM CORE PRIORITY:** These are regional core programs where the region is reporting to offices in HQ other than Office of Enforcement & Compliance Assurance (OECA). Select the appropriate Media Program Core Priority from the drop down menu.

**VOLUNTARY/PARNERSHIP PROGRAMS:** An activity (e.g. presentation, brochure, web site) promoting a voluntary action such as joining an EPA Partnership Program, implementing an environmental management system, adopting a pollution prevention practice or utilizing an innovative technology will be considered a compliance assistance activity only if the activity *explicitly* explains that performing this “voluntary” action will help a regulated entity either (1) comply with a federal regulation, statute, or executive order (e.g. waste minimization requirements under RCRA; alternative fuel requirements under EO 13423); (2) reduce their regulatory requirements (e.g. move from a small quantity generator to a conditionally exempt small quantity generator under RCRA); or (3) become unregulated (e.g. joining Federal Electronics Challenge eliminates computers from hazardous waste stream; dry cleaners who switch to wet cleaning are no longer subject to air toxics requirements).

**COMMON ACRONYMS (use with Initiatives)**

CAFO = Concentrated Animal Feeding Operation

CSO = Combined Sewer Overflow

LDAR = Leak Detection And Repair

MP = Mineral Processing

NSR/PSD = New Source Review/Prevention of Significant Deterioration

SSO = Sanitary Sewer Overflow

WW = Wet Weather

## Regional Priorities and OECA National Enforcement Initiatives

### REGIONAL PRIORITIES

Each year many of the regions select priorities based on important projects the senior management deems priority. Only your region's priorities will show on your ICIS screen.

### NATIONAL ENFORCEMENT INITIATIVES

Every three years the Office of Enforcement & Compliance Assurance (OECA) in coordination with the Strategy Implementation Teams (SIT) revisit complex pollution problems and agree on enforcement initiatives that also consider compliance assistance. For CA purposes, the term "enforcement initiative" can be misleading because the word "enforcement" seems to exclude assistance. However, assistance can and often should be an integral part of these initiatives.. If any CA activity is targeted to one or several of the enforcement initiatives, you can select those categories as appropriate.

### OECA NATIONAL INITIATIVES DROP-DOWN LIST IN ICIS:

In ICIS there is a drop down menu of current and past national enforcement initiatives. If your CA work is associated with an OECA National Initiative, click on the OECA National Priority drop-down list in ICIS. The national priority/initiative CA categories are listed first for each fiscal year and are identified with "CA ONLY," e.g., "2010 – (CA ONLY)." Choose the appropriate Initiative and be sure to choose the appropriate fiscal year. This "how to" guide will not attempt to list them here due to constant changes. Note that the current year Initiatives will appear at the top of the list with prior years listed below. If you'd like to learn more about the current initiatives go to: <http://www.epa.gov/compliance/data/planning/initiatives/index.html>.

NOTE: The entire CA activity does not need to focus on the selected Enforcement Initiative; rather, it could be a portion of your CA activity (e.g.. a workshop to municipalities with a 15 minute presentation on stormwater and 15 minutes on SSO).

**TRIBAL PRIORITY (aka INDIAN COUNTRY INITIATIVE):** All CA in Indian county should be connected with the Tribal Priority in ICIS through FY 2010 whether or not it is provided to a tribal entity. This includes activities affecting facilities that are located in Indian country whether or not they are owned by the tribe or a tribal member. The Tribal Priority should be selected when reporting this activity in ICIS.

<b><u>OECA National Priority, aka Initiative</u></b>	These are the National Initiatives selected by Office of Enforcement & Compliance Assurance (OECA) and implemented by the Strategy Implementation Teams (SIT).
<b><u>Regional Priority</u></b>	Each year many of the regions select priorities based on important projects the senior management deems priority. Only your region’s priorities will show on your ICIS screen.
<b><u>OECA Core Program</u></b>	OECA core program refers to those Office of Enforcement & Compliance Assurance (OECA) programs that are not national priorities.
<b><u>Media Program Core/Priority</u></b>	These are regional core programs where the region is reporting to offices in HQ other than Office of Enforcement & Compliance Assurance (OECA). Select the appropriate Media Program Core/Priority from the drop down.

**Naming Conventions**

There are no requirements to use naming conventions in the title of a CA activity record, but they are very useful to help you keep track of what work has been done. Activity record titles are listed in the CA Manager’s Report, so including regulatory program(s) addressed, facility name, type and location of training, and similar information in the title will make program reviews easier. For good program management, use a descriptive title. For example, “Air Toxics Autobody Rule Workshop – Boise, ID December 2009” tells the regulatory requirements covered, activity type, location, and date.

Note, a title cannot exceed 126 characters.



## Grants or Cooperative Agreements – CA Reporting

EPA can report compliance assistance activities conducted by grantees and recipients of cooperative agreements into ICIS in limited circumstances. Whether reporting of grantee work in ICIS is possible basically depends on the type of grant. EPA grant funds are available under two broad categories:

1. *Continuing Program Grants* are baseline grant programs awarded primarily to state, local and tribal governments. These grants are available under specific statutes (such as Clean Air Act Section 105, Clean Water Act Section 106, Resource Conservation and Recovery Act Section 3011) or under a combination of these programs in a Performance Partnership Grant. The purpose of these grants is to support ongoing state and tribal environmental programs, such as air, water, and waste.
2. *Project Grants or Cooperative Agreements* are available to a broader range of recipients for a wide spectrum of Agency priorities such as pollution prevention, watershed planning, environmental justice, and environmental education. Project grants change from year to year and can be managed by Regions or HQ.

Do not report in ICIS the compliance assistance work conducted by states or tribes under continuing program grants that include CA as a delegated responsibility. Instead, report in ICIS only the CA work conducted under project-specific grants. This distinction is made because ICIS is intended to only capture the activities where EPA has primary influence over CA implementation through either directly conducting the CA activity or directly funding the CA activity. A helpful distinction may be to report CA in ICIS if the costs of the CA activity could conceivably be itemized on the grant or cooperative agreement budget.

When reporting CA conducted under grants or cooperative agreements, be sure to select from the drop-down list in ICIS to indicate the party that conducted the CA activity through a grant or cooperative agreement.

ICIS field:

*If your activity is financed by EPA through a grant or cooperative agreement please identify the category that best describes the recipient.*

- *Academic/University*
- *Environmental Group*

- *Environmental Justice or Community Groups*
- *Federal Department/Agency*
- *Federally Recognized Indian Tribe*
- *Industry Trade Association*
- *Local Government*
- *Nonprofit Organization*
- *State/State Program*
- *Tribal Association/Organization*

ICR requirements under the Paperwork Reduction Act apply to grantees and partners under Cooperative Agreements if the EPA funds the information request or if the EPA requires that the grantee or partner entity conducts the information request as a condition of the grant or cooperative agreement. See the measures section for more information on ICR requirements.

## Planned Activities

The Planned Activities function can be used as a copy function. It allows fast data entry when you have many different activity types (or one type but many of them).

Planned Activities are ICIS record(s) entered at the beginning of the fiscal year (or throughout the year as needed) which represent CA activities that are anticipated for that given year. You may have several planned records in ICIS – one for each CA program or activity. Linking actual records (completed CA activities) to planned records is easy and saves time on data entry because the data (e.g. specific ICIS fields) in the planned record are automatically transferred to the actual record when linked. Valuable data entry time is saved by not having to enter numerous mandatory fields in each individual actual record. Also, creating this link eliminates the need to re-enter CA contact information. **Once a planned record is saved, ICIS will not allow you to edit/change it at a later date unless you save it with a date in the future (and change it before that future date) or current date (and make changes that same day).**

### **NAMING A PLANNED RECORD:**

The Planned Record itself is not used in any national reports or totals, but the linked actual records are. So when naming a planned

record, it's best to name it something you will remember later on and that makes sense to you. In most cases the linked actual record will have a different name and should follow the suggested naming conventions. For example:

**Planned Record:** Puerto Rico RCRA Healthcare Training

**Linked Actual Record:** Healthcare RCRA

#### **“SELECT ALL” OPTION:**

To ensure your planned record captures all activity types make sure to check the box “select all” under “Compliance Assistance Activity Type/Quantity”. The system will automatically select all types and place the number “1” in the “activity quantity” field. The “activity quantity” number can be changed if needed, but it's not necessary. This is simply a holding place to show that you plan to at least “1” of this type of activity. If you do not “select all” you will notice only those activity types selected are included in your choices for your linked record. This may pose a problem if, for example, later in the year you did a mass mailing and did not think about it in the original planned record. In this case, if you did not select OUTREACH DISTRIBUTED-TARGETED, then you will not be able to link this mass mailing effort. Using “select all” retains all options.

NOTE: If your regional management uses planned data to evaluate the expected work to be done in the coming fiscal year you should only enter those activity types you are actually planning to use or make sure your management understands why you did the “select all” option.

#### **LINKING ACTUAL & PLANNED RECORDS:**

At the far top right-hand corner of your planned record in ICIS notice a small toggle link titled +Add Actual Compliance Assistance. Click this link and ICIS will automatically transfer all information from the planned record into a new actual record. If you have more than one activity to enter under this one planned record, simply “save and continue” the first actual record when done, go back to the planned record, then hit the +Add Actual Compliance Assistance link again. This will bring you into a new actual record once more.

#### **TOGGLE SWITCH:**

You will notice after you have linked your first actual record to the planned record and save, there will be an easy way to go back and forth between planned and actual records by use of a toggle switch. Towards the bottom of the actual record is a section in ICIS called “Related Planned CA Record”. When currently in the actual record mode it will list a toggle switch to the planned. Conversely, when currently in the planned record mode it will list a toggle switch to the actual record(s). Clicking on these links will bring you back and forth and allow you to edit the actual record if needed.

#### **“NO PLANNING RECORD”:**

Have you ever noticed in search mode the phrase “No Planning Record” directly above a given record? This is simply because the

record directly below is not linked to a planned record.

**No Planning Record**

**176652 FY06 Wetland Meetings RM** (record not linked to a planned activity)

**EDITING LINKED RECORDS:**

There are a few fields in the linked record that should be changed to better fit the activity. Generally, when planned records are entered the information is very generic and the name of this record is one you made easy to remember. With completion of the actual activity, you have a better description of what went on and when the activity actually occurred. Although the information in the ICIS fields will be migrated from the planned to actual record, the following fields in the linked record (completed CA activity) should be edited to allow for clarity and accuracy:

- Compliance Assistance Activity Name (refer to the section titled “Naming Conventions”)
- Project Description
- Actual Completion Date

There will also be new fields in the linked record that will need to be considered (e.g. measurement questions).



**Measurement**

**Reporting CA Outcome Measures**

**If you don't measure it, it didn't happen!**

If you provide direct CA (i.e., where you are in direct contact with the entity reached) to a regulated entity or environmental assistance provider, then you are responsible for measuring the effectiveness of that activity and reporting outcome results in the CA module of ICIS. Some outcome measures are reported under the Government Reporting and Results Act (GPRA).

**DIRECT CA ACTIVITY TYPES:** Direct assistance includes - **workshop/training, presentation/meeting, facility visit, facility re-visit, on-going facility-specific work, and response to inquiries.**

There are three (3) primary outcome measures for the compliance assistance program, they are as follows:

1. Percentage of entities reporting an increased understanding
2. Percentage of entities reporting improved environmental management practices
3. Percentage of entities reporting reduced, treated, or eliminated pollution

Outcomes from number one above are reported internally within EPA. This increased understanding measure is summarized by OECA for all direct assistance, including National Enforcement Initiative work. Outcomes from numbers two and three above are both internally and externally reported under the **Government Performance Results Act (GPRA)** (i.e. OECA, Office of Management & Budget, Congress). All three of these measures are reported at mid-year and end-of-year certification periods.

Refer to the Collection Methods below on how to gather this data for reporting your results.

**MEASUREMENT DATA FIELDS IN ICIS:** As of FY2010, ICIS has new data fields to capture the measurement. The following are the current ICIS measurement data fields:

- A. Type of measurement conducted (drop-down list):
  - Compliance Database Check
  - Data/Report Submitted by Client
  - E-mail Survey
  - Mail Survey
  - On-site Revisit
  - On-site Visit
  - Phone Survey
  - Pre Survey/Post Survey
  - Workshop Survey
- B. Number of Respondents answering Increased Understanding Question
  - b. Of these respondents, number reporting an increase in Understanding
- C. Number of Respondents answering the Improved Environmental Management Practices Question
  - c. Of these respondents, number reporting a change in Environmental Management Practices

D. Number of Respondents answering the Reduction in Pollution Question

d. Of these respondents, number reporting a Reduction in Pollution

NOTE: there are two drop-down lists for selecting the facility actions you observed or were self-reported. Be sure to select the appropriate items from the correct list. See “Outcomes: Facility Actions Observed or Reported” topic below for more details.

E. Number of Respondents answering the Compliance Assistance Providers Question

e. Of these respondents, number reporting an increased ability to provide compliance assistance to their customers/clients

NOTE: The ‘E.e.’ set refers to the increased understanding of environmental assistance providers. Environmental assistance providers are defined as people who help others better understand the regulations. They can include federal employees, state employees, consultants, attorneys, industry trade groups, etc. These same people could also be considered a regulated entity if they are subject to a federal regulation and your activity is targeting them as such (e.g. federal facility underground storage tanks). The ‘E.e.’ option should be answered when your audience consists of environmental assistance providers.

Note: the numbers you enter in these data fields cannot exceed the number entered in the “entities reached” field.

**OUTCOMES: FACILITY ACTIONS OBSERVED OR SELF-REPORTED:** There are two drop-down lists in the measurement section of ICIS for reporting outcome data, improved Environmental Management Practices or Reduced Pollution. One is for reporting improvements you have observed; the other is for improvements that were reported to you. These outcomes are selected if indeed you have determined the entity has made changes as a result of your CA effort. It is very important to use the correct list—Observed or Self-Reported—when reporting facility actions. Again, keep in mind the limitations for collecting this data without an approved Information Collection Request (ICR, see below). Most often this outcome data is collected during a facility site visit or revisit through observations.

The following are the current twenty-two (22) selections in each of the two the ICIS drop-down lists. Note you can select more than one option by holding down the “Ctrl” KEY.

1. Applied for a permit
2. Conducted a self-audit
3. Contacted state or local regulatory agency or non-regulatory source for additional CA
4. Correct(ed) Monitoring Deficiencies
5. Corrected recordkeeping/reporting deficiencies
6. Developed a plan to meet requirements

7. Employees received continuing education credits or certification for completing training course(s)
8. Filed a notification or obtained a permit/certification (i.e., pursuant to NPDES general permit)
9. Identified pollution prevention opportunity
10. Implemented New or Improved Management Practices or Procedures
11. Implemented improvement in industrial process (i.e., reduced number of chemical baths, etc.)
12. Implemented material or waste recycling system (on- or off-site)
13. Implemented new waste treatment system
14. Improved Pollutant Identification (e.g., Monitoring)
15. Improved storage, transport, or handling of a waste (e.g., waste determination, labeling, etc.)
16. Installed new or repaired pollution control equipment
17. Instituted training or other communication on environmental requirements
18. Made chemical substitution(s) (less toxic alternatives)
19. Other
20. Provided report or other required data to EPA, state, or local regulator
21. Reduced Pollution (e.g., reduced, or eliminated emissions, spills or discharges)
22. Source reduction (e.g., reduced or eliminated use of new chemicals, materials, water, or energy)

NOTE: It is important to select the facility action that most closely describes what was observed or reported. A workgroup categorized these facility action selections to better identify those that are Direct (reduction of on-going releases), Preventative (prevention of future releases), and Work Practices to align their input to GPRA measures. These outcomes that you report in ICIS will feed into GPRA measures, so it is important to select the correct drop-down list and correct facility actions.

**EXAMPLE 1:** You conduct a CA site visit at an auto body repair shop to provide assistance on the new rule to control emissions from paint stripping and surface coating operations (NESHAP 6H). You observe that the paints used at this shop contain toxic metals, the stripping compounds contain methylene chloride (MeCl), and that they will need to comply with the new rule. You help the shop owner fill out the Initial Notification form and he gave you the completed form. You explained the 6H reporting requirements and showed him areas of the shop that need improvements. The owner was able to make an improvement while you are there: he noted they could use stripping compounds without MeCl for most of their operations. As you left, the shop owner thanked you for coming and told you he had learned a lot about the rule from your visit. The next day, he called you at the office and told you that he had held a staff meeting to discuss the 6H requirements, that they had developed a plan to reduce the use of MeCl by identifying the limited number of operations where MeCl was necessary, keeping MeCl compounds in a special labeled cabinet, and agreeing to use stripping compounds without MeCl for all other operations. He said he had also called his supplier to order filters that would capture at least

98% of paint overspray. He said the new filers had already arrived and been installed. He also asked you when he needed to submit his Annual Notification of Changes Report (answer: prior to March 1 of each calendar year).

Under “**What facility actions were Observed?**” drop-down menu, select:

3. Contacted state or local regulatory agency or non-regulatory source for additional CA (called you to ask date for filing Annual Notification of Changes Report)
8. Filed a notification or obtained a permit/certification (i.e., pursuant to NPDES general permit) (gave you completed Initial Notification form)
9. Identified pollution prevention opportunity (identified where could use stripping compounds without MeCl)

Under the “**What facility actions were Self-Reported?**” drop-down menu, select:

6. Developed a plan to meet requirements (plan to use MeCl only when necessary)
11. Implemented improvement in industrial process (i.e., reduced number of chemical baths, etc.) (now using MeCl only when necessary)
14. Improved Pollutant Identification (e.g., Monitoring) (keeping MeCl in special labeled cabinet)
16. Installed new or repaired pollution control equipment (installed new filters)
18. Made chemical substitution(s) (less toxic alternatives) (use compounds without MeCl whenever possible)

**OUTCOME INFORMATION COLLECTION:** Increased understanding typically is collected on the day of the CA activity. Improved environmental management practices and pollution reductions are typically collected at some point after the CA activity. For facility visits or revisits, this may be during the same visit if the facility takes the action immediately, or it may be observed during a subsequent visit. If you would like to apply for an ICR, see <http://intranet.epa.gov/icrintra/>.

There are several ways to collect outcome measurement. The following collection methods can be used without an Information Collection Request (ICR):

- **Pre & Post Test – Increased Understanding** – A series of questions that are specific to the regulatory aspect of the training; the same questions are asked to the audience before and after the event. The trick is to implement a system that allows you to know which pre and post test were answered by the same person since usually these are anonymous. Numbering the pre and post test can be helpful (e.g. A,A; B,B; C,C; 1,1; 2,2; 3,3, etc.)
- **Non-directive requests – Increased Understanding** – This is referring to feedback received from open-ended questions that are not designed to receive any specific response. (For example, the following question is considered a directed request for

information and cannot be used: “Did the instructor/s help you understand the class information?” The following question is considered a non-directive request for information and can be used: “Do you have any feedback regarding today’s workshop?”) Request for feedback can be made through, for example a “suggestion box” or blank cards left for attendees to fill out. Based on answers provided, you may be able to ascertain whether you helped the person increase their understanding of the EPA regulation. Increased understanding can occur during a response to inquiry (e.g. a phone call) through listening to their conversation and if they voluntarily state that they now understand the regulatory issue.

- **Observations** – Increased Understanding / Improved Management Practice / Reduced Pollution – depending on the situation, there may be monitoring conducted during a site visit (e.g. air monitoring at dry cleaners) or visual observation of management practices (e.g. labeled drums, repaired a leaky valve) improved during the site visit.
- **Data review** – Increased Understanding / Improved Management Practice / Reduced Pollution – Review in-house data such as permits, permit applications, TRI forms, NEPA reports, etc. before and after the CA activity to help you determine if an improvement occurred.

Also, an ICR is not needed for federal facility CA work and work conducted during a sanitary survey.

**INFORMATION COLLECTION REQUEST (ICR):** Under the Paperwork Reduction Act (PRA), EPA is not permitted to ask the same question of more than 9 non-Federal entities within the same year unless they have an approved Information Collection Request (ICR). In past years, OECA has received approval from the Office of Management & Budget (OMB) under the PRA to collect information for a specific set of questions through a generic CA Survey ICR. OMB will no longer approve a generic ICR but may approve narrower project-specific ICRs. Unless the region separately applies for an ICR and receives approval from OMB, you are not allowed to directly ask improvement questions to more than 9 non-federal entities in one given year, either at the time of the activity or during a follow-up survey. If you would like to apply for an ICR, see <http://intranet.epa.gov/icrintra/>.

Given the lack of ICR, it is important to understand the limitations for collecting outcome measures. Collecting outcome measures may require an approved ICR.

**Use of an outside entity’s survey results:** An outside entity could be a state, tribe, or local government, non-profit organization, etc., that has partnered with you on the CA event (e.g. workshop). As long as the outside entity has their own survey, their own questions, and they elect to share the survey results they have collected on their own, we can argue that **EPA** has not conducted or sponsored a collection of information from more than 9 non-federal entities by means of identical questions in a way that would trigger the Paperwork Reduction Act (PRA). But if we ask them to include a specific question, we would then be considered the sponsor of the

collection of information arising from that question, and thus the PRA would apply.

Always remember to contact your regional Compliance Assistance Coordinator (CAC) in the event you need assistance or have questions on measurement (a list of CACs is provided at end of this document).

**MEASUREMENT COLLECTED IN NEXT FISCAL YEAR:** If possible, any measurement should be collected in the same fiscal year that the activity takes place. However, if your activity takes place close to the end of the current fiscal year, follow up measurement may need to be collected in the next fiscal year. To accurately capture this follow up measurement, the following procedures should be followed:

- Open up the last fiscal year's ICIS record that corresponds to the measurement collected;
- Change the **end date** of this record to reflect the current fiscal year date in which the follow up measurement was collected;
- Enter the follow up measurement as appropriate;
- Save record.

By changing the **end date** you will see that the record appears in the current fiscal year's ICIS CA Manager's report (the fiscal year that the end date corresponds to). It will also remain in the original fiscal year's report. In essence the activity will be an "ongoing" activity and will appear in two fiscal year reports.

**RECORDING RESPONSE FROM A MAILED SURVEY:** A mailed survey must be approved by OMB through an ICR. OMB can review individual project/regional ICRs upon request. This process can be resource intensive and lengthy. If you would like to apply for an ICR, see <http://intranet.epa.gov/icrintra/>.

If you have a survey approved under an ICR, the following is the process for entering the survey results into ICIS:

A response means the survey question was answered with either yes or no. In some cases, mailed surveys are either ignored or contain limited or at times no actual measurement data. If absolutely no one returned the survey, then place a zero in both "number of respondents answering" and "number reporting a change" (Example 1 below). When only a few surveys are completed and returned and no respondents report an improvement, place the number of surveys returned in "number of respondents answering" and a zero in "number reporting a change" (Example 2 below). If only a few surveys are completed and returned and some respondents report an improvement, place the number of surveys returned in "number of respondents answering" and number of surveys that reported a change in "number reporting a change" (Example 3 below).

Two points to remember: 1) ICIS does not have a field for the total number of surveys distributed; and 2) to get credit for your survey effort you need to enter at least a zero (0) in the ICIS data fields.

**EXAMPLE 1:** If 30 surveys were mailed and zero were returned.

A. Number of respondents answering increased understanding question: 0

a. Of these respondents, number reporting an increased understanding: 0

B. Number of respondents answering the improved environmental management practices question: 0

b. Of these respondents, number reporting a change in environmental management practices: 0

C. Number of respondents answering the reduction in pollution question: 0

c. Of these respondents, number reporting a reduction in pollution: 0

**EXAMPLE 2:** If 30 surveys were mailed and 3 were completed and returned but all three respondents answered “no” to all three questions (e.g. the returned survey contained no measurement results).

A. Number of respondents answering increased understanding question: 3

a. Of these respondents, number reporting an increased understanding: 0

B. Number of respondents answering the improved environmental management practices question: 3

b. Of these respondents, number reporting a change in environmental management practices: 0

C. Number of respondents answering the reduction in pollution question: 3

c. Of these respondents, number reporting a reduction in pollution: 0

**EXAMPLE 3:** If 30 surveys were mailed and 2 were completed and returned and both respondents reported an improvement.

A. Number of respondents answering increased understanding question: 2

a. Of these respondents, number reporting an increased understanding: 2

B. Number of respondents answering the improved environmental management practices question: 2

b. Of these respondents, number reporting a change in environmental management practices: 1

C. Number of respondents answering the reduction in pollution question: 2

c. Of these respondents, number reporting a reduction in pollution: 0

NOTE: Typically you should not see a reduction in pollution unless there has also been an improved environmental management practice by that respondent. Further, you should not see an improved environmental management practice unless that respondent has also increased her/his understanding. Logically you would not have reduced pollution or improved environmental management practice without an increased understanding.

**“Assistance Provided To”**

The “**assistance provided to**” field in ICIS lists three categories: Environmental Assistance Providers; Regulated Entity; and Unknown. **You must select the PRIMARY audience for your activity.** You can select as many in the one category as you like (e.g. Regulated Entity-Federal Facility; Regulated Entity-State Government, etc), but do not select from multiple categories. Selecting from multiple categories results in a validation error.

Audience Categories	Examples of Activities for this Audience
<p><u>Environmental Assistance Providers</u> are people who help others better understand the regulations. They can be federal employees, state employees, consultants, attorneys, Industry Trade groups, etc.</p>	<p>A workshop on construction storm water permit. Attended by mostly State inspectors, a few construction company representatives, and one concerned citizen. The majority in attendance are State inspectors as assistance providers.</p>
<p><u>Regulated Entities</u> are facilities or individuals that are required by law to comply with a regulation. They can be Federal Facilities, Tribal or State Agencies, Municipalities, industry sectors, small businesses, school superintendents, etc.</p>	<p>A Wetland Delineation training for developers attended by mostly developers, one representative from the Corp of Engineers, a few local residents, and a consulting firm. The majority in attendance are developers who are regulated so “regulated entities” should be selected.</p>
<p><u>Unknown</u> category can be the anonymous callers, general public, teachers, students, etc. Generally this category is for audiences who are not subject to regulations, and are not in the business to</p>	<p>A presentation in a grade school on drinking water. Attended by mostly school children, 2 teachers, and 1 superintendent. The majority in attendance are school children.</p>

help others better understand the regulations.

This category is not aggregated in the national standard report for national CA totals. As an EPA CA provider, you may want to consider whether it's beneficial to your program to keep track of "unknown" category.

**Aggregation of Data**  
**Number of CA activities that can be included in one record**

**FACILITY CA SITE VISIT / RE-VISITS , WORKSHOP / TRAININGS and ON-GOING FACILITY-SPECIFIC WORK**

- No aggregation of data allowed. One data record is required for each activity, regardless of whether they support core work or the OECA National Priorities/Enforcement Initiatives.

**FOR ALL OTHER CA ACTIVITIES:**

- Aggregation is allowed for all other activity types regardless of the quantity. Activity types include presentation/meeting; response to inquiry; outreach distributed targeted; outreach distributed public; targeted outreach-web; and tools developed.

**Activity Types: Overview**

Current activity types in the CA Module of ICIS are listed below. See the individual sections for a definition of the activity type.

- Response to Inquiry
- Facility Visit
- Facility Re-visit
- On-going Facility Specific Work

- Outreach Distributed – Targeted
- Outreach Distributed – Public
- Targeted Outreach – Web
- Tools Developed
- Presentation/Meeting
- Workshop/Training (including webinar)

**ONE-TO-ONE RATIO:** The following activity types must have a one-to-one ratio. That is, the activity quantity must equal the number of entities reached:

- Response to Inquiry
- Facility Visit
- Facility Re-visit
- On-going Facility Specific Work



## Response to Inquiry

Response to inquiry can be any response to any inquiry about compliance assistance (not enforcement), such as: phone calls, e-mail requests, or written letter. The response to the inquiry must meet the requirements set forth in the definition of CA (on page 4).

A response to inquiry is NOT a situation where the entity is forwarded to someone else for the answer (e.g. transfer to another EPA staff member, transfer to the State). If you forward an inquiry to another expert for a response, this is not considered your providing the CA, but that the other expert will need to record that inquiry as CA, if appropriate.

Use of a phone log is encouraged if you receive large volumes of inquiries. The phone log will help you keep track of the entity's name, type (regulated or provider), phone number and issue/answer. The phone log could have a yes/no category for increased understanding outcome measure. Remember that without an OMB approved ICR you can not directly ask the recipient if they've

increased understanding as a result of your assistance (refer to Measurement section of this guide). However, if by listening to their conversation you can observe that you are indeed helping them better understand the regulation, you can then report “increased understanding” outcome measure. Be sure to indicate on the phone log whether the caller is a member of the public or unknown, a regulated entity, or an environmental assistance provider. Since you cannot report one response to inquiry record for both environmental assistance providers and regulated entities, the phone log should be split along the type of entity and then reported in two separate ICIS records.

As a result of the inquiry you may be asked to mail out CA information (e.g. brochure, documents). In this case, a second ICIS record for Outreach Distributed Targeted is needed.

**ONE-TO-ONE RATIO:** Remember that responses to inquiries are one-to-one ratio for ICIS. If you receive one phone call where five people are on the other end on speaker phone, this would be considered one entity reached and one activity quantity.

Common Reporting Questions, Issues, Challenges	How to Report in ICIS
<p><u>EXAMPLE</u> Over the course of three months you’ve received 25 phone calls regarding the lead-based paint regulations from school superintendents. You’ve kept a phone log and in review of this phone log you see that you’ve recorded 20 people have increased their understanding of the regulations as a result of your discussions and observations.</p>	<p><u>RECORD:</u>  <b>Activity Type</b> = Response to Inquiry  <b>Activity Quantity</b> = 25  <b>Number of Entities Reached</b> = 25  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Total number of respondents is 25: increased understanding is 20</p> <p>DATA ENTRY TIP: To make data entry easier, throughout the year you can simply update this one ICIS record as you receive more inquiries on this subject. You simply go back to the same record and update the <u>activity quantity</u>; <u>number of entities reached</u>; <u>start/end dates</u>; and <u>increased understanding measurement fields</u>. Another option is to enter one record for each quarter (e.g. Q1, Q2, Q3, and Q4). If you are managing more than one program, you may want to consider entering one response to inquiry record for each program (e.g. “FY09 Q1 Lead</p>

in Schools”).

NOTE: measurement is based on the criteria in Measurement section of this guide (i.e., pre/post tests, non-directive requests, observations, data reviews.)



## Facility Visit and Facility Re-visit

A facility visit and revisit involve an event in which you go to a facility for the sole purpose of providing CA to facility managers and/or workers. Each visit is reported in a separate record. In cases where you expect an on-going effort with one facility over the course of the year, you may want to consider entering the many site visits and related activities into one “On Going Facility Specific Work” ICIS record.

Remember, these events are not conducted as an inspection or as part of an enforcement case; the sole reason of the visit must be to provide CA. Any CA provided during an inspection should be entered into the Compliance Monitoring module of ICIS—not the CA module—and the CA questions in the Compliance Monitoring module should be answered.

**ONE-TO-ONE RATIO:** Remember that facility visits and re-visits are one-to-one ratio for ICIS. If you visit a site and help 4 facility people while at the visit, then this equates to one entity reached and one activity quantity.

NOTE: If a site visit is used as a training event, it should be counted as a workshop/training or presentation/meeting in ICIS. For example, auto body new rule training may happen on site at an actual auto body shop because this would be an excellent means to demonstrate best practices. Report this site visit as a workshop/training or presentation/meeting rather than a site visit.

Common Reporting Questions, Issues, Challenges	How to Report in ICIS
<p><u>EXAMPLE</u>            You conduct a facility visit at a dry cleaner site and meet with the owner and the owner’s daughter. Your purpose is to provide CA on the Clean Air Act and how to detect Perchloroethylene (PERC) leaks and what to do if a leak is found. During the visit you give the owner a calendar, which is a tool to help stay in compliance with the regulations on PERC. You observe the owner has an increased understanding because he has voluntarily indicated such.</p> <p>Five months later you return to the same site for a re-visit to see if the owner followed your recommendations and/or corrected any problems, and to make sure he continues to manage the facility safely and correctly in accordance to EPA environmental regulations. You find that they have been using the calendar correctly during this period because it is hanging on the wall and had data notes. You observe that they have reduced pollution as a result of their improved environmental management practice and they show you records indicating such.</p>	<p><u>RECORD 1</u>  <b>Activity Type</b> = Facility Visit  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = 1 (even though you met with 2 people, it was one facility)  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Total number of respondents is 1; increased understanding is 1</p> <p><u>RECORD 2</u>  <b>Activity Type</b> = Outreach Distributed Targeted  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = 1  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Not needed for outreach distributed</p> <p><u>RECORD 3 (five months later in same fiscal year)</u>  <b>Activity Type</b> = Facility Re-visit  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = 1  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Total number of respondents is 1; improved environmental management practice (e.g. record keeping; leak repair) and reduced pollution (e.g. reduced PERC emissions)</p> <p>NOTE: The environmental management practice and reduced pollution measures in the example above were recorded in a “re-visit” record because they were observed during the re-visit. Keep in mind this re-visit record is a result of a visit. The visit record is already recorded in ICIS with no follow up</p>

	<p>measurement.</p> <p>DATA ENTRY TIP: A description for the ICIS user could be added in the <u>facility visit</u> record telling the user the follow up measures are recorded in the corresponding re-visit record.</p> <p>NOTE: measurement is based on the criteria in Measurement section of this guide (i.e., pre/post tests, non-directive requests, observations, data reviews.)</p>
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### On-going Facility Specific Work

On-going facility specific work (OGFSW) is a CA activity that takes place over a length of time (e.g. several months or longer) with a single regulated entity and could include a combination of activity types such as site visits, meetings, tools developed, etc. Each OGFSW activity is reported in a separate record. OGFSW allows you to combine all the related phone calls, visits, and meetings with a particular facility into one record for a fiscal year without having to enter each individual activity.

**ONE TO ONE:** Remember that on-going facility-specific work is one-to-one ratio for ICIS. If you help one facility but during the course of the effort you are dealing with many different people, then it is considered one entity reached and one activity performed (activity quantity).

Common Reporting Questions, Issues, Challenges	How to Report in ICIS
<p><u>EXAMPLE</u>            You provide CA to Tribally-owned schools that will take the full fiscal year. The on-going work is to set up a program with 3 Tribes and to provide sampling of their drinking water throughout the school year so that they can identify and address any elevated</p>	<p><u>RECORDS:</u> (There will be three records, one for each tribe)  <b>Activity Type</b> = On-going Facility Specific Work  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = 1  <b>Assistance Provided To</b> = Regulated Entity</p>

<p>lead in their schools' drinking water. These site visits included a full range of compliance assistance to the Tribal leader while the water sampling was taking place. You also have many meetings throughout the year to discuss results and best management practices. And you develop fact sheets to help them better understand the drinking regulations.</p>	<p><b>Measurement</b> = Total number of respondents is 1; increased understanding is 1; * improved environmental management practices, * reduced pollution</p> <p>(*You may or may not have these measurement results depending on what you learned about the work.)</p> <p>NOTE: measurement is based on the criteria in Measurement section of this guide (i.e. pre/post tests, non-directive requests, observations, data reviews.</p>
<p><b>Outreach Distributed-Targeted and Outreach Distributed-Public</b></p>	
<p>The ‘outreach distributed’ category is meant to capture your efforts of mass mailings and other outreach that contain CA material. If you send outreach materials to one entity with the intent that they will distribute the materials, then entities reached is 1 until you get proof they sent the compliance assistance materials out. Once you have that proof (e.g. telephone confirmation), then you can go back to the original record and update ‘entities reached’ based on the number provided by that one distributing entity.</p>	
<p>Common Reporting Questions, Issues, Challenges</p>	<p>How to Report in ICIS</p>
<p><b>Examples of TARGETED outreach:</b></p> <ul style="list-style-type: none"> <li>• Mass mailings to a targeted audience (e.g., lead paint outreach to Realtors)</li> <li>• Toxic Release Inventory (TRI) outreach to facilities</li> <li>• Regional sector-specific web sites</li> <li>• Trade shows (typically sector-specific)</li> <li>• Articles in trade magazine</li> <li>• Response to a regulated entity/CA provider requesting</li> </ul>	<p><u>RECORD:</u>  <b>Activity Type</b> = Outreach Distributed Targeted  <b>Activity Quantity</b> = number of different outreach materials (for example if one brochure is mailed to 500 people, activity quantity = 1)  <b>Number of Entities Reached</b> = number of people who received the material or 1 if many were sent to one entity with the plan to redistribute at a later date (update when number is confirmed). In</p>

<p>information</p>	<p>example above, entities reached = 500.  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = None (not needed for outreach targeted).</p> <p>NOTE: Typically outcome measures are not collected for targeted outreach. However, there are situations where materials (e.g. reports, sample results, etc.) might be collected as a result of targeted outreach, such as for TRI reports submitted as a result of calling a select group of facilities or annual sludge reports as a result of bio-solid reminder letters to treatment plants. <b>BUT REMEMBER</b>, you can not assume that the received material was a direct result of your outreach, especially if the outreach was a mass mailing. The mass mailing reminding the sector of their regulatory responsibility may lead to results (e.g., submitted report), but there must be some program mechanism in place for you to identify those who submit <u>as a result</u> of your outreach effort, for example, hits to a unique URL provided in the outreach.</p> <p>NOTE: measurement is based on the criteria in Measurement section of this guide (i.e., pre/post tests, non-directive requests, observations, data reviews.)</p>
<p><b>Examples of PUBLIC outreach:</b></p> <ul style="list-style-type: none"> <li>• Mass mailings not targeted to a specific sector/audience or to an unregulated audience</li> <li>• Any outreach to the general public</li> <li>• Public Service Announcements (PSA)</li> <li>• Articles in general circulation newspapers</li> <li>• General regional web pages</li> <li>• Public Home Shows &amp; Garden Shows</li> <li>• Response to a general public requesting CA</li> </ul>	<p><u><b>RECORD:</b></u>  <b>Activity Type</b> = Outreach Distributed-Public  <b>Activity Quantity</b> = number of outreach materials  <b>Number of Entities Reached</b> = number of people who received the material or 1 if many were sent to one entity with the plan to redistribute at a later date (update when number is confirmed)  <b>Assistance Provided To</b> = Unknown  <b>Measurement</b> = None (not needed for outreach distributed)</p>

NOTE: Public outreach entities reached numbers are not included in the CA Managers Report.

## Outreach Targeted - Web

We recognize there are many tools posted on the web, but to estimate outreach distributed through the web to the regulated entity, we are focusing on tools that are rich in CA content and we assume that the general public normally does not download technical rich CA tools and that these CA tools are more likely being downloaded by regulated entities.

Keep in mind, development of any CA tool would continue to be counted as a separate record under “Tool Developed”, and once this tool is placed on the web, it would be counted through “Outreach Targeted Web” if it meets the five (5) criteria listed below.

### **Five (5) criteria for what counts as a CA tool for “Outreach Targeted -Web”:**

To be counted a CA tool distributed from the web this tool must meet the following criteria:

1. be designed for the regulated entity and especially include CA information, **and**
2. be content rich CA information (not just simple mention of a sector initiative). The viewer must explicitly know that they are receiving guidance on how to comply with a EPA regulation, **and**
3. have a URL ending in html, or htm, or pdf. Some URLs may lack these file extensions, and if so, this implies an “html” ending, **and**
4. have your Region code or the HQ Program Office code in the URL address. Regions/HQ Program Offices have respective TSSMS Identifiers included in the URL, for example, [http://www.epa.gov/r02earth/ahera/100\\_quest.pdf](http://www.epa.gov/r02earth/ahera/100_quest.pdf), **and**
5. avoid “alias” TSSMS Identifiers. Some regions have several TSSMS accounts for the same CA tool - different regional codes (“alias”). For example:
  - [http://www.epa.gov/r02earth/ahera/100\\_quest.pdf](http://www.epa.gov/r02earth/ahera/100_quest.pdf)
  - [http://www.epa.gov/region02/ahera/100\\_quest.pdf](http://www.epa.gov/region02/ahera/100_quest.pdf)
  - [http://www.epa.gov/Region2/ahera/100\\_quest.pdf](http://www.epa.gov/Region2/ahera/100_quest.pdf)
  - This exact same tool is located in three different places. The “alias” in this example are: **region02**, and **Region2**. The **r02earth** is the actual Maxamine TSSMS Identifier account for Region 2.

The following are Regional TSSMS Identifiers that should be used when identifying your URL CA tools in Step 1:

- R1 = “region01”
- R2 = “r02earth”
- R3 = epa.gov/reg3 or epa.gov/region03
- R4 = “region04”
- R5 = epa.gov/reg5 or epa.gov/region5
- R6 = “earth1r6”
- R7 = “rgytgrnj”
- R8 = “unix0008”
- R9 = “region09”
- R10 = “r10earth”, “R10”, or “yosemite.epa.gov/R10”
- OECA = “oecaerth”

For those Regions where a TSSMS is not listed here (R3, R5), or for those not certain, it is best to consult with the Maxamine report which lists the URL visits and downloads and identifies your regional code (TSSMS Identifier) being used by Maxamine.

**Example URL**

[http://www.epa.gov/r02earth/ahera/100\\_quest.pdf](http://www.epa.gov/r02earth/ahera/100_quest.pdf)

- file extension is **pdf**
- region code TSSMS Identifier is **r02earth**
- content rich CA material
- targeted to regulated entity, the school sector

**Just how are these CA tools being tracked and counted in ICIS?**

OECA/CASPD developed a *Web Based Compliance Assistance Activity Tracking and Reporting Guidance (March 26, 2010)* document to help outline the roles and responsibilities for the regional/HQ program staff and the headquarters contractor. The contractor will be collecting monthly web data from the National Computer Center by using the Agency’s web analysis software, Maxamine, that allows a single consistent data source from which we can record and track how many times per month a specific URL (i.e., CA tool) has been downloaded. To ensure your Region and HQ Program Office is capturing your CA web tools, the following four (4) basic steps must be done:

- ☆ Step 1: Regional and HQ Program Offices may submit a list of URLs (new, updated, revised URLs) to OECA/CASPD twice a year, by **November 30<sup>th</sup>** and again by **May 31<sup>st</sup>**. This list must meet the five (5) criteria identified above.
- ☆ Step 2: OECA/CASPD will supply the most current URL listing to the contractor on **December 15<sup>th</sup>** and **June 15<sup>th</sup>**.
- ☆ Step 3: The OECA/CASPD contractor will generate a summary URL Maxamine traffic report twice a year, on **March 30<sup>th</sup>** and **September 25<sup>th</sup>**. This URL Maxamine traffic report will show how much activity took place for your regional CA web tools (e.g. the URLs which you submitted in Step 1 and can be accessible via the intranet at <https://maxamine.epa.gov/oeca/CA/>).
- ☆ Step 4: Regional and HQ Program Offices are responsible for accessing your data from Step 3 and entering it into your ICIS database. It is entered as “Outreach Targeted-Web”.

#### **How to enter your URL hits into ICIS as “Outreach Targeted-Web”**

Once you receive your traffic report from Step 3 above, you are responsible for entering that data into ICIS. It is highly suggested that one program person enter the whole Region/HQ web data. This will eliminate any possible record duplication. The following are two different methods you can enter your data as an “Outreach Targeted-Web” record:

##### Method One:

Enter separate “Outreach Targeted-Web” records for each sector type. This requires a keen knowledge of each URL and which sector(s) they represent, then adding up those specific sector URL totals.

**Activity Name:** 2009 R2 Web Based Tracking – Schools (it’s important to have the word “web” in the title)

**Compliance Assistance Activity Type:** Outreach Targeted-Web

**Project Description:** Fiscal year 2009, 6 different school sector URLs targeted to the regulated community mostly focusing on AHERA regulations.

**Activity Quantity:** 6

**Entities Reached:** 9,215 (This is the number of hits from the Maxamine traffic report added up for all 6 School URLs)

**Statutes/Section:** Identify the most appropriate regulatory statute/sections. For AHERA it would be the Toxic Substances Control Act (TSCA).

**Sectors Addressed:** If you know the sector, select it (e.g., for schools, 611110). Otherwise, select the generic sector 339999.

**National Priority/Regional Priority/Core Program/Media Program:** If you know for a fact the specific URL is targeted to a National or Regional Priority, then select it. If not, then select the appropriate media program or core program.

**Have you planned/conducted measurement:** No

**Actual Start/Completion Dates:** The beginning and ending of the Fiscal Year or Quarter depending on how you added the numbers up for Entities Reached.

**Assistance to a small entity:** Yes (It is assumed the smaller regulated entity will seek compliance assistance on the web more often than a larger regulated entity).

**Assistance Provided To:** Regulated Entity

**Measurement:** None

Method Two:

Rather than entering a separate “Outreach Targeted-Web” for each sector-specific URL(s) (e.g. schools, healthcare, dry cleaners, etc.), you may prefer to enter one single record that captures all your URLs regardless of sector type. In this case, you can choose to enter one record for each quarter and update the Entities Reached at end of each quarter or one record for the whole year. For example:

**Activity Name:** 2009 R2 Web Based Tracking – Q1, Q2, Q3, Q4 (it’s important to have the word “web” in the title)

**Compliance Assistance Activity Type:** Outreach Targeted-Web

**Project Description:** Fifty-seven (57) different compliance assistance, content rich, sector-specific URLs targeted to the regulated community for Fiscal year 2009, Quarters 1, 2, 3, and 4.

**Activity Quantity:** 57

**Entities Reached:** 36,068 (This is the number of hits from the Maxamine traffic report added up for all 57 URLs for all 4 quarters)

**Statutes/Section:** Identify the most appropriate regulatory statute/sections.

**Sectors Addressed:** Select the generic sector 339999.

**National Priority/Regional Priority/Core Program/Media Program:** When entering one master ICIS record for all 57 URLs, you can not select a National Priority even if one of the URLs is indeed targeted as such. You’d have to enter that URL separately. For this master ICIS record of all 57 URLs you’ll need to select either the appropriate media program or core program check box.

**Have you planned/conducted measurement:** No

**Actual Start/Completion Dates:** The beginning and ending of the Fiscal Year or Quarter depending on how you added the numbers up for Entities Reached.

**Assistance to a small entity:** Yes (It is assumed the smaller regulated entity will seek compliance assistance on the web more often than a larger regulated entity).

**Assistance Provided To:** Regulated Entity

**Measurement:** None

## Tools Developed

To receive credit as a tool in ICIS the item must contain sufficient CA material to be used by the recipient to understand the EPA regulation(s). Tools can include (but are not limited to): fact sheets, CA guides, newsletters; non-enforcement related letters w/ regulatory references and/or web links; sector specific CD ROM. The tool must be an item that provides CA to the user and is instructive in helping the recipient understand or comply with a federal regulation. A power point presentation would only be considered a tool if materials contain pertinent information that the users will refer back to at a later date (e.g. new regulations, how-to guidance, regulatory references).

Tool translation into another language: When a tool is translated into another language it equates to a separate tool. If one tool is written in English and then translated into Spanish, Korean, and Cantonese, this would equate to 4 tools developed.

Common Reporting Questions, Issues, Challenges	How to Report in ICIS
<p><b><u>EXAMPLE – CD ROM with existing tools</u></b>            You've developed a CD that contains 50 different tools that other people made.</p>	<p><b><u>RECORD:</u></b>  <b>Activity Type</b> = Tool Developed  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = Not needed for tool developed  <b>Assistance Provided To</b> = Not needed for tool developed  <b>Measurement</b> = Not needed for tool developed</p>
<p><b><u>EXAMPLE – CD ROM with new tools</u></b>            You've personally developed 50 individual tools and placed them on one CD.</p>	<p><b><u>RECORD:</u></b>  <b>Activity Type</b> = Tool Developed  <b>Activity Quantity</b> = 51 (50 plus 1 CD)  <b>Number of Entities Reached</b> = Not needed for tool developed  <b>Assistance Provided To</b> = Not needed for tool developed  <b>Measurement</b> = Not needed for tool developed</p>

<p><b><u>EXAMPLE – 3 tools in 1</u></b>          You’ve created a tool, and released it in paper, on the Internet, and on a CD.</p>	<p><b><u>RECORD:</u></b>  <b>Activity Type</b> = Tool Developed  <b>Activity Quantity</b> = 3  <b>Number of Entities Reached</b> = Not needed for tool developed  <b>Assistance Provided To</b> = Not needed for tool developed  <b>Measurement</b> = Not needed for tool developed</p>
<p><b><u>EXAMPLE – Joint collaboration</u></b>          You have a joint collaboration with the State Agency to develop a guidance document for the metal finishing sector. The State has EPA funds to print and distribute the 3,000 documents.</p> <p>The important point is this is a joint project between EPA and the State. If the State were to do this completely on their own without EPA support/funding, then it would not be entered into ICIS.</p>	<p><b><u>RECORD 1</u></b>  <b>Activity Type</b> = Tool Developed  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = Not needed for tool developed  <b>Assistance Provided To</b> = Not needed for tool developed  <b>Measurement</b> = Not needed for tool developed</p> <p><b><u>RECORD 2</u></b>          After the document is distributed and you have confirmation of amount distributed, then you would enter a second record:  <b>Activity Type</b> = Outreach Distributed Targeted  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = 3,000  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Not needed for outreach distributed</p>
<p><b><u>EXAMPLE – Another region’s tool</u></b>          You take a tool that another Region developed and make the following changes:</p> <ul style="list-style-type: none"> <li>• Region and State information, <u>and</u></li> <li>• New or additional regulatory references, <u>and/or</u></li> <li>• New or additional sector information.</li> </ul> <p>NOTE: Simply changing the Regional and State contact information does not equate to a new tool developed.</p>	<p><b><u>RECORD:</u></b>  <b>Activity Type</b> = Tool Developed  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = Not needed for tool developed  <b>Assistance Provided To</b> = Not needed for tool developed  <b>Measurement</b> = Not needed for tool developed</p>



## Presentation/Meeting

The presentation/meeting category in ICIS is meant to capture your efforts to present CA material and/or meet with the regulated community and environmental assistance providers. Each time you present at a workshop, training, conference, you can get credit for your efforts. Typically preparing for a presentation or meeting is not as time consuming as the workshop/training category. When you present at someone else’s workshop, it is considered a presentation not a workshop.

For Webinars, refer to the “Grey Area” section.

Common Reporting Questions, Issues, Challenges	How to Report in ICIS
<p><u>EXAMPLE</u></p> <p>An environmental workshop by a trade association has 2,000 attendees. Your presentation reaches 50 of these attendees. During the presentation you give out 2 different pieces of outreach. You leave another 100 (50 copies of each) at the table so that other workshop attendees will take them. Later that day, you find all 100 were taken by meeting attendees.</p> <p>The measurement collected by using an open ended blank suggestion card showed that 45 attendees took the time to fill out the blank card, 40 of whom voluntarily indicated increased understanding of environmental regulations.</p>	<p><u>RECORD 1:</u>  <b>Activity Type</b> = Presentation/Meeting  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = 50  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Total number of respondents is 45: increased knowledge is 40</p> <p><u>RECORD 2:</u>  <b>Activity Type</b> = Outreach Distributed Targeted  <b>Activity Quantity</b> = 2  <b>Number of Entities Reached</b> = 50  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Not needed for outreach distributed</p> <p><u>RECORD 3:</u>  <b>Activity Type</b> = Outreach Distributed Targeted</p>

	<p><b>Activity Quantity</b> = 2  <b>Number of Entities Reached</b> = 50  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Not needed for outreach distributed  NOTE: You need to be sure the CA materials were taken by attendees and not removed during cleanup.</p> <p>NOTE: measurement is based on the criteria in Measurement section of this guide (i.e. pre/post tests, non-directive requests, observations, data reviews.)</p>
<p><u>EXAMPLE</u>  I gave one presentation that covers multiple regulations. How many presentations should I report?</p>	<p>Enter only one presentation. However, be sure to select the appropriate statutes and law sections to reflect the multiple regulations and provide clear description in the description field.</p>
	<h2>Workshop/Training</h2>
<p>The workshop/training category is meant to capture your efforts to develop and put together a workshop or training event with regulated community and/or environmental assistance providers as the audience. Typically preparing for a workshop or training activity is much more time consuming than the presentation/meeting activity. Each workshop/training is recorded in a separate record.</p> <p>Keep in mind that if you are only <u>presenting</u> at a face to face workshop, this would be counted as a “presentation/meeting” in ICIS, not “workshop/training”.</p> <p>A workshop conducted on the internet (e.g. a webinar) is categorized as a “workshop” in ICIS. A webinar is counted as a “workshop” if indeed the amount of time to prepare and develop the webinar is equal to that of a face to face workshop (e.g. securing venue, preparing materials, invites, measurement, etc.).</p>	

For Webinars, refer to the “Grey Area” section. Webinars are considered to be Workshop/Training but are reported in ICIS uniquely.

Common Reporting Questions, Issues, Challenges	How to Report in ICIS
<p><u>EXAMPLE</u>            You develop and conduct an 8-hour workshop on Underground Storage Tanks for federal facilities. In attendance are staff from 11 federal facilities, 8 State inspectors, a member of a leading consulting firm and 3 managers of non-government facilities. The primary purpose was to target the regulated federal facilities. 23 people attended in total.</p> <p>Pre- and post-tests were distributed at the workshop. All 23 completed the tests. Results show that 20 increased their understanding of the regulatory issues.</p> <p>Several months later and <u>in the same fiscal year</u> an <b>OMB approved survey</b> was mailed to all 23 participants. Five returned the survey; all claimed improvements in environmental management practices, and one claimed pollution reduction.</p> <p>NOTE: You <b>must</b> get OMB approval for any survey sent to more than 9 non-Federal entities in the United States in any fiscal year. You would not need to get OMB-approved ICR to survey only Federal facilities. See Outcome Information Collection discussion on Page ?? for more information.</p>	<p><u>RECORD 1</u>  <b>Activity Type</b> = Workshop/Training  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = 23  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Total number of respondents is 23: increased understanding is 20.</p> <p><b>Measurement added several months later to same record</b> = Total number of respondents is 5: improved environmental management practices is 5; reduced pollution is 1</p> <p>This example might also require additional ICIS records depending on your situation: presentation/meeting; tools developed; outreach targeted.</p> <p>NOTE: A post-workshop survey can be sent to Federal Facilities without OMB approval. OMB approval must be obtained for any survey sent to more than 9 non-Federal entities in a year or measurement must be based on the criteria in Measurement section of this guide (i.e. pre/post tests, non-directive requests, observations, data reviews.)</p>
<p><u>EXAMPLE</u>            Two Regions collaborate on developing and/or delivering a workshop/training. Does each Region report the workshop?</p>	<p>No. The Regions should discuss how to enter this data to avoid double data entry. Do not report two workshops. A general rule of thumb is whichever Region did most of the work should be the</p>

	one to get the ICIS credit. If both Regions conducted presentations during this workshop then both Regions would enter presentations under separate records.
<p><b>Training Provided to a Team of EPA Staff Only</b></p> <p>A program office conducts a workshop for EPA staff throughout the regional office on an upcoming new rule. 40 people are in attendance, all from EPA program offices. The program office conducts a survey at the end of the workshop because the EPA does not need an ICR to collect outcome measures from a federal facility. The survey results indicate that all 40 attendees increased their understanding and 30 of them increased their ability to provide compliance assistance (as only 30 have this role in their job description—note training to EPA staff who are not EAPs is not CA).</p>	<p><u>RECORD 1:</u>  <b>Activity Type</b> = Workshop/Training  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = Number of total attendees = 30 (Only 30 attendees are EAPs. The number of federal agencies is not counted because the training is for EAPs, not as regulated entities)  <b>Assistance Provided To</b> = Federal Government  <b>Measurement</b> = 30 increased understanding, 30 increased ability to provide compliance assistance.</p>
<b>Grey Areas – Is this CA?</b>	
Over the course of managing the CA program there may be situations where it is not clear if the activity actually would be considered compliance assistance. Some of these more common grey areas are identified below. Also remember to refer to the CA definition starting on page 5 of this guide.	
<b>Common Reporting Questions, Issues, Challenges</b>	<b>How to Report in ICIS</b>
<p><b>Webinars</b></p> <p>Webinars are compliance assistance workshops conducted</p>	<p><u>RECORD 1 (Hosting Region/HQ Office):</u>  <b>Activity Type</b> = Workshop/Training  <b>Activity Quantity</b> = 1</p>

through the internet and typically have audience from many regional locations.

The Region or HQ Program Office that is hosting the webinar is the one who would enter the ICIS record as a “Workshop/Training” and the presenters could enter their individual presentation as “Tools Developed” if appropriate.

For “Workshop/Training” records, the “entities reached” would equal the total number of attendees.

The webinar presentations could be considered a “Tool Developed” if it meets the definition in this guide. In addition, compliance assistance material might be distributed as part of the webinar, which would equal “Outreach Distributed-Targeted” in ICIS.

For ICIS data entry, make sure to communicate and achieve agreement on who will be considered the “hosting” entity and therefore who will enter the webinar as a “Workshop/Training”. Under no circumstances should more than one Region/HQ enter a webinar as “Workshop/Training” for the same webinar, as this would be double counting for the same CA activity. Each presenting Region enters the “Tool Developed” records. But again, this needs to be communicated to eliminate double counting. If there are additional CA materials (beyond the presentation(s)) sent to attendees before or after the webinar, whomever sends these would enter that record as “Outreach Distributed Targeted.” Most likely this would be the webinar host.

Generally if there is measurement (e.g. pre/post tests or observed question/answer session) this measurement data would be entered

**Number of Entities Reached** = Number of total webinar participants

**Assistance Provided To** = Who the webinar was targeted to, be it regulated entity, or environmental assistance provider.

**Measurement** = Results from pre/post test, observed through question/answer session, etc.

RECORD 2 (Region A Presented):

**Activity Type** = Tools Developed (the presentation slides)

**Activity Quantity** = 1

**Number of Entities Reached** = Not needed for tools developed

**Assistance Provided To** = Not needed for tools developed

**Measurement** = Not needed for tools developed

RECORD 3 (Region B Presented):

**Activity Type** = Tools Developed (the presentation slides)

**Activity Quantity** = 1

**Number of Entities Reached** = Not needed for tools developed

**Assistance Provided To** = Not needed for tools developed

**Measurement** = Not needed for tool developed

RECORD 4 (Hosting Region/HQ Office):

**Activity Type** = Tools Developed (additional webinar slides, if any)

**Activity Quantity** = 1

**Number of Entities Reached** = Not needed for tool developed

**Assistance Provided To** = Not needed for tool developed

**Measurement** = Not needed for tool developed

RECORD 5 (Hosting Region/HQ Office or other as appropriate):

**Activity Type** = Outreach Distributed Targeted

**Activity Quantity** = 1

**Number of Entities Reached** = Number of total webinar

<p>under the “Workshop/Training” record. The “Tools Developed” record will not contain measurement.</p>	<p>participants  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Not needed for outreach distributed</p>
<p><b>Inspection Follow-up letters</b></p> <p>In cases where no violation is evident, letters written after an inspection that identify areas where improvements could occur, request information of the facility, and also provide websites and/or other relevant compliance assistance related to that specific facility. To be considered compliance assistance, the letter can not be linked in any way to a violation. See example records at right.</p> <p>In cases where there a potential violation has been found, a program office may send a warning letter (e.g., notice of noncompliance or notice of violation) with information about how to comply with a regulation. This is considered informal enforcement because it followed an inspection in which a violation was found. This is not considered compliance assistance and no records should be entered in the CA module.</p>	<p><u>RECORD 1:</u>  <b>Activity Type</b> = Tool Developed  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = Not needed for tool developed  <b>Assistance Provided To</b> = Not needed for tool developed  <b>Measurement</b> = Not needed for tool developed</p> <p><u>RECORD 2:</u>  <b>Activity Type</b> = Outreach Distributed Targeted  <b>Activity Quantity</b> = 1  <b>Number of Entities Reached</b> = 1  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Not needed for outreach distributed</p>
<p><b>Compliance Assistance to the General Public and Schools</b></p>	
<p>Often CA is targeted to the general public and therefore it is difficult to determine if the audience is governed by a regulation (hence, whether there is a “regulatory hook”). Here we attempt to clarify some typical cases of CA to the general public. Remember, in terms of audience type, the general public category in ICIS is referred to as “unknown” category. This category is not aggregated into the total number of entities reached since we cannot determine whether the audience is in fact comprised of regulated entities or other assistance providers. As an EPA CA provider, you may want to consider whether it is beneficial to your program to keep track of general public outreach, depending on how your Region/program uses the data.</p>	

Common Reporting Questions, Issues, Challenges	How to Report in ICIS
<p><b>Pesticide Program (FIFRA)</b></p>	<p>Pesticide program typically reaches out to the general public. This activity would be entered as “outreach distributed-public” and “unknown” for assistance provided to. The most common way pesticides CA would be provided to a <u>regulated entity</u> would be if the CA activity targeted pesticide manufacturers, or applicators, or school superintendents; those entities would have to comply with the FIFRA regulations directly.</p> <p>There could be situations where the audience is the general public, but the general public is clearly subject to a federal requirement. For example, assistance is given regarding FIFRA labeling regulations, wherein the general public would be violating the FIFRA laws if they did not follow the label requirements. In these very specific cases, the general public would be considered regulated. In the case of FIFRA to regulated entity, the activity would be considered <u>outreach distributed-targeted to regulated entity</u>.</p>
<p><b>Schools – Outreach</b></p>	<p>At times EPA is asked to provide CA to K-12 or University on environmental requirements such as lead in drinking water, storm water construction, underground storage tanks, etc. The environmental outreach to the people who run the school (e.g. school superintendents, principals, managers, and, at times, teachers) is considered CA to <u>regulated entity</u> in ICIS. However, an activity providing outreach to school students or parents on general environmental issues, e.g., Earth Day events, is <u>not</u> considered outreach to regulated entities because they are not responsible for complying. This outreach is considered general public, or “unknown” category in ICIS.</p>

**Difference between a  
Trade Show and Home & Garden Show**

A Trade Show is targeted to a specific industrial trade, whereas a Home & Garden Show or Home Show is geared more towards the general public and not any specific trade. You might have builder/contractors attend a Home & Garden Show, but as a general rule the targeted audience is the general public. The National guidance states that outreach at the typical Home & Garden Show should be identified as “Outreach Distributed-Public.” Outreach at a typical trade show should be identified as “Outreach Distributed-Targeted.” Regardless of the type of event, effort should be made to count and report the actual number of people receiving CA. If you are not able to report the actual number of people receiving compliance assistance, the follow examples can help you determine the number of entities reached.

Common Reporting Questions, Issues, Challenges	How to Report in ICIS
<p><b><u>EXAMPLE Trade Show</u></b>            You attend a construction industry trade show focusing on storm water erosion control and have a table where you are distributing three different Clean Water Act brochures and two Guidance Documents. You count the handouts before the day begins, and at the end of the day. You determine 1,500 brochures and 150 Guidance Documents were taken.</p>	<p><b><u>RECORD 1</u></b>  <b>Activity Type</b> = Outreach Distributed-Targeted  <b>Activity Quantity</b> = 5  <b>Number of Entities Reached</b> = 1,650  <b>Assistance Provided To</b> = Regulated Entity  <b>Measurement</b> = Not needed for outreach distributed</p>
<p><b><u>EXAMPLE Home &amp; Garden Show</u></b>            You attend a Home &amp; Garden show and have a table where you are distributing seven different environmental brochures. You count the handouts before the day begins, and at the end of the day. You determine that you distributed 3,400 brochures in total.</p>	<p><b><u>RECORD:</u></b>  <b>Activity Type</b> = Outreach Distributed-Public  <b>Activity Quantity</b> = 7  <b>Number of Entities Reached</b> = 3,400  <b>Assistance Provided To</b> = Unknown  <b>Measurement</b> = Not needed for outreach distributed</p>

## ICIS Contact Information

ICIS Help Desk: 202-564-7756, [icis@epa.gov](mailto:icis@epa.gov)

## Memos and Guidance related to this CA ICIS How To Guide

**NOTE: Many CA guidance and memos can be accessed at the following intranet site:**

**<http://intranet.epa.gov/oeca/oc/caspd/cacoordinators/reporting/index.html>. For those not able to access the intranet, contact your CAC. On this site you will find:**

- 1. 2005 Guidance Addendum for Reporting CA in the ICIS, March 2005**
- 2. CA Module ICIS and Definitions, James Edward memo, September 20, 2007**
- 3. Compliance Assistance Resource Compendium for FY2008-2010 National Enforcement & Compliance Priorities, January 7, 2008**
- 4. Guide for Addressing Environmental Problems Using an Integrated Strategic Approach, March 2007**
- 5. Role of the Inspector, John Peter Suarez memo, June 25, 2003**
- 6. ICDS 2006 Results, Michael Alushin memo, March 21, 2007**
- 7. ICDS Manual, Michael Stahl memo, August 21, 2007**
- 8. Inspectors Compliance Assistance Resource Guide, February 11, 2008**
- 9. Sanitary Survey, James Edward memo, December 9, 2005**
- 10. Sanitary Survey, James Edward memo, July 30, 2007**
- 11. OECA National Program Manager Guidance, June 19, 2007**
- 12. FY09 Measure Results w/o ICR, Lisa Lund memo. December 19. 2008**
- 13. FY09 Reference Guide for Measures w/o ICR, Lisa Lund memo attachment, December 19, 2008**
- 14. FY09 CA Policy Changes, Karin Koslow memo, March 12, 2009**
- 15. Web Based Compliance Assistance Activity Tracking and Reporting Guidance (March 26, 2010)**
- 16. ICIS Compliance Assistance Reporting Guidance, Robbi Farrell memo, March 26, 2010**

## Compliance Assistance Contacts

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[www.epa.gov/reg3ecej/compasst.htm](http://www.epa.gov/reg3ecej/compasst.htm)

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[www.epa.gov/region4/ead/compliance/index.htm](http://www.epa.gov/region4/ead/compliance/index.htm)

Donna Howard, Region 5 CAC  
[howard.donna@epa.gov](mailto:howard.donna@epa.gov) 312-866-6739  
[www.epa.gov/region5/enforcement/index.htm](http://www.epa.gov/region5/enforcement/index.htm)

Israel Anderson, Region 6 CAC  
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[www.epa.gov/earth1r6/6en/ca/ca.htm](http://www.epa.gov/earth1r6/6en/ca/ca.htm)

Neal Gilbert, Region 7 CAC  
[gilbert.neal@epa.gov](mailto:gilbert.neal@epa.gov) 913-551-7985  
[www.epa.gov/region7/enforcement\\_compliance/index.htm](http://www.epa.gov/region7/enforcement_compliance/index.htm)

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[www.epa.gov/region8/compliance/assistance.html](http://www.epa.gov/region8/compliance/assistance.html)

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<http://www.epa.gov/region10/>

## Sector NAICS Codes for Consistent Compliance Assistance Reporting

- Use this chart as guide for when selecting the data field(s) for “**Sectors Addressed (NAICS Code)**”.
- If you do not know the sector which your CA activity represents, then simply select the NAICS code **339999**.

Sector	NAICS	NAICS Description
Across all sectors	339999	All other miscellaneous manufacturing
Agriculture practices	333111	Farm machinery & equipment manufacturing
Aquatic weed control	115112	Soil preparation, planting & cultivation
Asbestos abatement/demolition	562910	Remediation services
Auto salvage/recycling	423930 423140	Recyclable material merchant wholesalers Motor vehicle parts (used) merchant wholesalers
Auto service/repair shops	811198	All other automotive repair and maintenance
Cattle feedlots	112990	All other animal production
Chemical	325998	All other miscellaneous chemical product & preparation manufacturing
Colleges & Universities	611310	Colleges universities & professional schools
Computers & Electronics	334111	Electronic computer manufacturing
Construction	236220	Commercial & institutional building construction
Dry cleaners	812320	Dry cleaning & laundry services
Elementary & secondary schools	611110	Elementary & secondary schools
Federal Facilities	921190	Other general government support
Foam & furniture	326150	Urethane & other foam product (except polystyrene) manufacturing
Food processing	311999	All other miscellaneous food manufacturing
Gas industry	213112	Support activities for oil and gas operations
General public	813410	Civic and social organizations
General business assistance	339999	All other miscellaneous manufacturing

<b>Sector</b>	<b>NAICS</b>	<b>NAICS Description</b>
Hospital/medical facilities	622110	General medical & surgical hospitals
Marinas	713930	Marinas
Metal services	332999	All other miscellaneous fabricated metal product manufacturing
Mineral processing	327999	All other miscellaneous nonmetallic mineral product manufacturing
Municipalities	921120	Legislative bodies
On-shore oil & gas exploration	213112	Support activities for oil and gas operations
Petroleum refining	333298	All other industrial machinery manufacturing
Pesticide manufacturing	325320	Pesticide & other agricultural chemical manufacturing
Pharmaceuticals	424210	Drug & druggists' sundries merchant wholesalers
Printing	323119	Other commercial printing
Prisons	922140	Correctional institutions
Real estate associations	531210	Offices of real estate agents & brokers
Secondary aluminum	331314	Secondary smelting & alloying of aluminum
Shipbuilding and repair	336611	Ship building & repair
Shooting ranges	713990	All other amusement & recreation industries
State/local government	921120	Legislative bodies
Transportation	336999	All other transportation equipment manufacturing
Tribal	921150	American Indian & Alaskan Native Tribal Governments
Wastewater Treatment Plants	221310	Water supply and irrigation systems