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THE AGENCY PERSPECTIVES PANEL (CONTINUED)

V. ENVIRONMENTAL PROTECTION

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Thank you, Bill. I guess we are supposed to break around noon, so I will try to keep my remarks fairly short and hopefully relevant. Let me say that I am pleased to be here to share in some of the discussions of what Federal agencies are doing with respect to evaluation. Although I will not be able to attend all of these sessions, several people from our program evaluation staff are here, as well as others within the agency who are involved in evaluation; hopefully we will all come away somewhat smarter.

One word of background here. First of all, my office, Planning and Evaluation, generally is involved in the evaluation role in its entirety, if you assume a fairly loose definition of evaluation. However, within my office, we do have one division, the Program Evaluation Division, whose role in life really is to carry out evaluations, in the more traditional definition most of us give to that term.

To try to keep my remarks fairly brief, I'd like them to be guided by two criteria. First, rather than tell everything I know about evaluation in EPA, I'd want to emphasize those aspects which I believe are somewhat unique to us. Perhaps they are only unique as I see them, either because I don't know all that is going on in other agencies, or because I am somewhat biased in the way I view our impacts and our approach.

Second, because it's critical to those of us involved in the evaluation function, I want to focus on the process of doing evaluation, the organizational aspects, and how one feeds evaluation back into Agency planning.

The first thing I'd like to say--something that fits neither of the two criteria--is that there are two realizations which would logically argue that we ought to be emphasizing more the role and activity of evaluation within our agencies. All of us are confronted with a shortage of resources, and logic says, therefore, that you need to spend time and funds to try to find how to best allocate those resources you do have in trying to accomplish your task. And even in those instances when you have adequate resources, one can't just throw them at a problem and expect a reasonable solution. Again, one needs analyses, an evaluation in order to focus the efforts.

As I said, these two factors, I believe, tend to argue strongly that there will be more evaluation activities within the Government. I think, however, that at least one of those factors also argues that more evaluation efforts may not occur. As our resources get tighter and tighter, some managers within an agency begin looking fairly closely and longingly at those analysts who don't seem to be doing anything "constructive" (that is, the evaluators) and will try to get them involved in day-to-day operational activities. Certainly that is one concern I have within EPA.

Let me turn now to evaluation at EPA. We started the Program Evaluation Division in late 1973, staffed it up shortly thereafter, and I think we now have a pretty good program. Our intent was to develop an organization to try to determine to what extent the agency's

activities and programs as a whole constitute an effective, comprehensive attack on the nation's environmental problems. That is a very ambitious objective.

We look at the evaluation group also with the hope of their being able to provide fairly detailed information to our line managers, enabling them to better carry out individual programs.

In addition, we have drawn very heavily upon our evaluators to help us define operationally the agency's goals and objectives in our various programs, and to help the line managers look at those in quantitative, measurable terms so we can better assess where we are having some impact.

One area where EPA is perhaps unique is in the operational concept that we pursue within our Program Evaluation Division. We emphasize the relevancy of the evaluation the group is undertaking, the usefulness of the evaluation, and its potential impact on a program. We are not really interested in the ultimate report that may be written from the evaluation effort.

The second operational concept we have established is to work closely with the program office people as we carry out our evaluations. In fact, we have found (with the exception of only one evaluation) that by the time we have finished the report a large proportion of the recommendations in the report have already been implemented by the program office. We are pleased with this situation. I contrast this to what I have seen in several instances where the attitude of the evaluation people is to work in a secretive manner so as to come up with a startling report at the end--the idea being to have a big impact, not on what the agency is doing, but on the boss, by

showing him what great things have been discovered. In my view, that fundamental attitude or approach just does not result in an effective evaluation effort over time.

A couple of comments with respect to the audience targeted by these evaluations. First of all and certainly foremost, we do them for the internal managers within EPA, the actual program managers. The kinds of things that come up in these evaluations are recommendations with respect to resources, or organizational aspects; perhaps an evaluation will recommend a different mix of the subprograms which are being pursued in order to accomplish a particular programmatic objective. Or the evaluators may try to help define more precisely (or in more measurable terms) for the program people what their goals are or might be.

In addition, we are involved in carrying out evaluations which have been requested either by the Congress, by OMB, or by interagency groups addressing programs closely related to those of EPA.

Another point I want to touch upon is the organizational aspect of evaluation within EPA. The Program Evaluation Division is within my shop and under the Assistant Administrator for Planning and Management. This Division constitutes the focal point within the agency for major, comprehensive kinds of evaluations. Clearly, there are other groups within the agency who also carry out evaluations. We have a Management and Organizational Division within the Office of Planning and Management which undertakes evaluations, although these efforts are focused primarily on efficiency and organizational questions. We have the Program Analysis Division within our budget shop which addresses resource questions and evaluates primarily in the context of the budget.

In addition, our regional offices do a very limited amount of evaluation. At EPA, we have made a decision to develop an evaluation capability within the regions. I recognize the concern that was expressed in previous comments⁷ and which must be kept in mind in pursuing this kind of course--i.e., that the regional evaluators spend their time doing regional policy analysis or evaluations which would be better undertaken at the national level. But in our case, we feel very strongly that the Regional Administrators are charged with carrying out a whole host of environmental programs. In the ten regions, we have a differing environment which we are trying to impact. Some of EPA's programs are much more relevant in some regions than others, and our view is that it's critical for that Regional Administrator to have some capability--some central capability within his region--that can, on a systematic basis, provide input to him as to which of the many national programs seem to have the most impact on the more severe environmental problems in his region.

With respect to this point, EPA has made a clear decision and we are pushing in that direction. We are still not where we would like to be with the development of this capability in the regions. We are finding that some Regional Administrators agree with our decision and are reallocating resources to carry out the evaluation function. But we still have a few who feel they don't need it.

A few more comments with respect to the staffing within the Program Evaluation Division. The formal evaluation group is not very large--in fact, it's only about 12 to 15 analysts. We have a number of approaches for augmenting that staff since no matter how

⁷See pages 40 through 43 above.

you cut it, that is a small group given the size of the agency, the magnitude of the dollar resources we are handling, and the severity of the environmental problem we are trying to improve.

First of all, we try to have the Program Evaluation Division take the lead in all our major evaluation activities. We augment that staff with some program people or with other analysts in the agency who know something about the particular problem or who have some sort of functional relevance to it (e.g., the organizational or budget aspect). We might wind up with a team of five analysts to address a particular problem, with from one to three of those coming from the Evaluation Division.

There are some real pluses to this approach, although I have debated this question with many people, in particular the GAO folks. From my point of view, I feel there are certain efficiencies associated with this approach, in that we can get "up to speed" much more quickly with a particular effort if we have substantial input and participation from the program people.

Secondly, because our ultimate goal is not just to write a report, but rather to implement our findings, we have found that program participation really facilitates actual implementation.

Finally, there is the important side aspect of enhancing the working relationships between the evaluation group with the program office as the evaluation effort proceeds.

One other comment with respect to staffing. We have followed the course of generally trying to maximize the use of in-house staff resources rather than going to consulting firms or others as some agencies do. One pays a price for not relying as heavily upon

outside capabilities in that you may not be able to take on as many evaluations as is desirable. In addition, you may not get quite as much expertise on the team as you may desire, at least in the beginning. But I think in our view, it is working out well because of the vast amount of programmatic knowledge we develop within the Evaluation Division and the critical contribution of that knowledge to some of the other functions which the Division carries out.

That really brings me to the next point which, I think, from the evaluator's point of view, may be the most fundamental question of all. That is, after this evaluation is done, how does it get fed into the operational loop to make something happen because of it? It's the whole feedback issue. How do I insure an evaluation is fed into the Agency program planning cycle so that something happens because of this analysis?

Here again, I think EPA and the approach we have taken is somewhat unique. We have directly tied the Program Evaluation Division to the agency planning cycle; and we have done it in four ways. The Evaluation Division actually manages the four systems which are largely the guts of the process. The first system is program development. The Evaluation Division is involved in the actual writing and development of strategies for new programs. As you may recall, in the last two years the agency has had three new major pieces of legislation: the Drinking Water Act, the Toxic Substances Act and the Resource Recovery Act. In two of those three cases, analysts in the Program Evaluation Division were the key individuals in writing those strategies.

The second major system which the Evaluation Division manages is the MBO⁸ system, which, incidentally has its pluses and minuses. In any case, to the extent that it has some meaning and impact within the Agency, the Evaluation Division manages that process and thus has an opportunity to insure that evaluations are considered.

The third area is the preparation of the annual agency guidance plan which lays out agency and program priorities, goals and the terms of measurement which both the headquarters and the regions are to gear their activities to in the coming year.

Finally, EPA annually ranks the many different objectives and programs which we have established to try to improve the environment in order to provide additional guidance in allocating agency resources. Again, management of that effort is carried out by the Evaluation Division.

We have thus tried to structure our system so that the people who are doing the evaluations are intimately involved with the major management systems within the agency, though insuring that we get maximum impact from the evaluation effort.

I have some notes here on some various evaluations that we have done. But, in the interest of time, I think I will skip them. Let me wind up by saying, perhaps in contrast to some of the earlier comments, I am fairly "upbeat" on evaluation, at least within EPA. Hopefully, I am still somewhat objective about where we are with it. I think generally it's seen by EPA management as a valuable, effective management tool. I think we are committed to its continued use and growth.

⁸ Management by objectives.

I should point out, however, that we are not without many of the problems everyone in this business is confronted with--e.g., trying to measure effectiveness, and attribution when various levels of Government are involved. I think the other aspect that troubles me sometimes is that we do not have enough time or resources to ask some of the very fundamental questions which a true evaluation should; for example (with respect to our agency) what programs are really cleaning up the environment from the health and the ecological viewpoints? Perhaps over time we will get closer to addressing these types of questions.

Thank you.

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