

GROUND WATER FORUM ISSUE PAPER SOP

An Issue Paper topic may be proposed by the Ground Water Forum (GWF) or by a Technical Support Center (TSC). The Ground Water Forum reviews the Issue Paper proposal and decides if the GWF supports the development of the Issue Paper. If the GWF decides to support the development of the Issue Paper, the GWF forms an Issue Paper Workgroup and oversees the development of the paper. Issue Papers are commonly developed by TSC staff and their contractors; but may also be developed by others (e.g., Headquarter (OSRTI) contractors and regional and state staff such as Ground Water Forum members and state participants).

Roles and Responsibilities:

Co-Chairs: The GWF Co-chairs approve the workgroup chair as well as the members of the Issue Paper Workgroup. It is the Co-chairs responsibility to monitor the progress of the Workgroup and to revise the composition of the workgroup as needed. The Chair of the Workgroup and the composition of the workgroup may change over time as commitments and work priorities change.

Workgroup Chair: The Chair of the Workgroup is responsible for ensuring the progress of the Workgroup such that the scheduled milestones are achieved and for maintaining communication with all the members of the Workgroup regarding the work of the Workgroup. The Chair, or their designee, must organize conference calls, meetings, and manage the workgroup. Workgroup reports must be prepared prior to Ground Water Forum meetings and/or conference calls. The Workgroup Chair has the obligation to inform GWF Co-chairs if they cannot keep to the schedule. When a Chair becomes overcommitted, he/she should request assistance and/or transfer responsibility to another member of the Workgroup or the Ground Water Forum.

Workgroup Members: Workgroup members are responsible for completing assigned tasks on schedule. Workgroup members have the obligation to inform the Workgroup Chair if they cannot keep to the schedule. It is also the members' responsibility to monitor the progress of the Workgroup and identify impediments to the workgroup's progress to the Workgroup Chair and the GWF Co-chairs. Membership in the workgroup may change over the course of the Issue Paper's development as additional members may join the workgroup and others may terminate their involvement.

Progress:

Development of the Issue Paper will occur over a period of time (see Figure 1, Schedule Template for Issue Papers with recommended times). It will be important to communicate expectations to the developer and agree on a schedule for development of the paper at the beginning of the process. Progress of the Issue Paper's development will be reviewed at every GWF meeting. If it is determined at a meeting that there has been inadequate progress, the need and timeliness of the Issue Paper will be reevaluated. If the GWF reaffirms the need and timeliness of the Issue Paper, the schedule may be revised. The functioning of the workgroup will also be evaluated and the GWF Co-chairs will assist the workgroup and its chair to improve the functioning of the workgroup as appropriate. The GWF will determine whether to terminate development of the paper if adequate

progress has not been achieved by the following GWF meeting. If development of the Issue Paper is progressing, however development is taking longer than allowed by the approved schedule, reapproval of the Issue Paper by the GWF is required; if the Issue paper is reapproved then the schedule will be revised.

1. Proposal Development

Each Issue Paper topic is to be submitted in writing in a proposal that includes a brief problem statement, the paper's purpose, target audience, and an outline of pertinent questions and objectives to be addressed. The proposal should identify the potential developer(s) and explain why the proposed developers are qualified to develop the paper. A GWF initiated proposal may be prepared by a single member or state participant or by a workgroup composed of several members and/or state participants.

2. Proposal Review

- a. The proposal should be presented to the GWF at a meeting or during a monthly teleconference for discussion and approval. The written proposal should be provided to members and participants at least 30 days prior to the scheduled presentation.
- b. The author(s) of the proposal present the proposal during a GWF meeting or monthly teleconference.
- c. Members/participants may provide comments, ask questions or raise objections to the proposal by email to the author(s) of the proposal (who will summarize and send to all members and state participants) prior to the meeting/teleconference or orally during discussion of the proposal at the meeting/teleconference.
- d. At the next subsequent monthly teleconference (after additional discussion if needed) a consensus poll will be taken to determine if the GWF supports the development of the Issue Paper. Any member/participant with a significant concern regarding the proposal may request (via email sent to all members and state participants prior to the meeting/monthly teleconference or orally during the meeting/teleconference) and receive a delay of the consensus poll for 30 days until the next monthly teleconference. Any request for a delay must explain the concern and provide rationale for the delay.
- e. If the GWF approves the Issue Paper proposal, one GWF member or state participant will be identified to oversee the development and chair the Issue Paper Workgroup. At a minimum, two workgroup members from the Forum will also be identified. (Usually members of a proposal workgroup continue as members of the review workgroup.) The proposal will not advance without the requisite workgroup. A target date for the outline and first draft will be proposed during the meeting/teleconference discussion. A detailed outline may have been prepared as part of the Issue Paper Proposal; if the developer agrees to this outline there will be no new outline required; if the developer proposes to revise the outline, then a revised outline would be required.
- f. Co-chairs will contact the appropriate contracting official to acquire access to the proposed developer (or contact the developer if the developer is not a contractor), verify availability to develop the Issue Paper, and discuss the target date for the outline and first draft. Co-chairs will identify the chair of the review workgroup to the developer as the technical point of contact and transmit the written proposal to

the contracting official/developer.

- g. Co-chairs will identify any approved Issue Paper topics, the developer and proposed target dates for the outline and first draft of the Issue Papers, the chair and members of the review workgroups, and solicit additional workgroup members.

3. Issue Paper Development

- a. Workgroup members, the developer, and appropriate contract officials have a kickoff meeting to discuss workgroup expectations, answer developer questions, and agree upon a schedule (see Figure 1).
- b. The workgroup chair transmits the Issue Paper's development schedule to the Co-chairs. The schedule should be considered a contract between the Issue Paper Workgroup and the GWF. The workgroup is expected to follow the approved schedule and to achieve the scheduled milestones.
- c. In accordance with the schedule, the developer prepares a detailed outline of the paper for review by the workgroup. A detailed outline may have been prepared as part of the Issue Paper Proposal; if the developer agrees to this outline there will be no new outline required; if the developer proposes to revise the outline the revised outline would be a required deliverable. After the workgroup approves the outline, it is sent to GWF members/state participants. If there are any significant changes in the scope of the Issue Paper compared to the original proposal, then the outline is reviewed by GWF members/state participants to confirm the modified scope.
- d. In accordance with the schedule and outline, the developer drafts the Issue Paper.

4. Initiation of Issue Paper Review

- a. Thirty days before the draft Issue Paper is due, the review workgroup chair confirms with the contracting official/developer that the paper is on schedule and contacts the workgroup members, confirming the review schedule (typically workgroup reviewers have a six-week time frame (see Figure 1) for sending comments to the review workgroup leader) and confirming their commitment to complete the review on time. Additional review workgroup members may be solicited from the forum (the requisite workgroup size must be maintained).
- b. The workgroup reviews any potential conflicts of interest among its members. If the workgroup decides that a conflict of interest exists, then the workgroup determines what action to take. If there is not consensus within the workgroup (the person with the perceived conflict of interest does not participate in the vote) then the issue is sent to the entire GWF for dispute resolution as soon as possible (generally within one week).
- c. When the draft Issue Paper is completed, the developer sends the draft Issue Paper to the chair of the review workgroup.
- d. The workgroup chair distributes the draft Issue Paper for review to the other members of the review workgroup with a copy of the Issue Paper proposal and outline, and sets a deadline for comments to be submitted to him or her.
- e. The workgroup chair informs the Co-chairs of initiation of the review, the review schedule and confirms that there is a quorum of workgroup members. The Co-chairs inform the forum of the initiation of the review and send the draft to GWF members/state participants for their potential review. Any non-workgroup reviewers

are expected to submit comments by the established deadline and participate in the review comment consolidation and conflict resolution process of the workgroup.

5. Issue Paper Review

- a. Workgroup members (and any other GWF members/state participants who are providing review comments) submit their comments to the workgroup chair by the established deadline. Written comments are submitted to the workgroup chair as emails that cc all members of the workgroup. Written comments explain basis for the comment and include (as appropriate) any references for sources of information.
- b. The workgroup chair consolidates the comments (typically within six weeks of receiving comments, (see Figure 1). The consolidation of comments entails putting the comments in similar format and order, eliminating redundant comments, clarifying comments, and if the comments from different reviewers are conflicting, resolving the conflict. If there are conflicting comments, the workgroup chair includes the conflicting comments in the consolidated comments, identifies the conflicts and submits them to the workgroup with a proposed plan to resolve. Conflicts should be resolved as quickly as possible. The resolution is typically done by discussions with the authors of the conflicting comments. If this action does not resolve the issue(s), a conference call with all of the review workgroup is held to resolve the opposing opinions. A workgroup member may request a conference call with the entire workgroup to discuss the issues.
- c. The draft consolidated comments are sent by the workgroup chair to the review workgroup (and other reviewers if any) for concurrence. Any objection to the draft comments must be made to the workgroup chair in writing (including rationale for objections and proposed alternate wording) within the timeframe designated by the workgroup chair. The workgroup chair will attempt to resolve any objections within the workgroup.
 - i. If the workgroup chair determines that there is not consensus within the workgroup and objections to or conflicts between comments cannot be resolved within the workgroup, then the opposing views are brought to the Forum membership for resolution (following the procedures in Section V of the “By-Laws”). The workgroup chair (with assistance of the workgroup members that are party to the conflict) prepares a summary of the conflict, aggregating or dividing issues as needed. The summary will include brief position statements on both sides of the issue items.
 - ii. The workgroup chair sends the conflict summary to the Forum Co-chairs for distribution to the GWF membership for vote by the regional members to resolve the dispute. Consistent with Section V of the “By-Laws”, only regional U.S. EPA Forum members participate in the dispute resolution vote.
- d. Once objections or conflicts (if any) within the workgroup are resolved, the workgroup determines if any major revisions of the Issue Paper are needed. The comments are finalized and the standard disclaimer* is added. The final comments are sent by the workgroup chair to the Issue Paper developer, appropriate contract officials, and the co-chairs. The GWF is informed that this milestone has been achieved and if any major revisions are expected. The Co-chairs send the comments to GWF members/state participants for their information

6. Revision of the Issue Paper

- a. If the developer has questions about and/or objections to the comments, then the Issue Paper developer will clarify/reconcile the problems with the workgroup before preparing a Response to Comments.
- b. The developer will prepare a Response to Comments and revise the Issue Paper.
- c. The Issue Paper is reviewed by the workgroup.
 - i. If major revisions are needed, the Issue Paper will be revised by the developer consistent with the Response to Comments and then re-reviewed by the Issue Paper workgroup following the same process outlined above (Section 5).
 - ii. If no major revisions are required, the Issue Paper is revised consistent with the Response to Comments and then reviewed by the workgroup chair to confirm that revisions are consistent with the Response to Comments.
- d. The developer and appropriate contract officials of the Issue Paper are informed that the Issue Paper is acceptable to the GWF. The GWF is informed that this milestone has been achieved and that the final draft is available upon request but is not for general distribution.
- e. The workgroup and the GWF will propose names of potential peer reviewers to the appropriate contracting officials of the Issue Paper (or developer if not a contractor) who will confirm the availability of the proposed peer reviewers.
- f. The Issue Paper is sent for Agency Peer Review (as required) in accordance with the established Agency Peer Review process by the appropriate contracting officials of the Issue Paper (or developer if not a contractor) and the Issue Paper undergoes Agency Peer Review

7. Finalization of the Issue Paper

- a. Following the completion of Peer Review, the workgroup will determine if a summary matrix of peer review comments is needed and will request this from the developer or contracting official.
- b. The developer of the Issue Paper will prepare the Peer Review Response to Comments. If Agency Peer Review identifies major comments, the appropriate contract officials of the Issue Paper (or developer if not a contractor), will consult with the developer and with the workgroup chair regarding resolution of the peer review comments. Major comments raised by peer review may require the workgroup chair to consult with the entire workgroup and/or the forum Co-chairs regarding the need for significant revision, additional review of the document before publication and adjustments to the schedule.
- c. The developer of the Issue Paper will revise the document as required by the peer review comments and send the paper to press.

** Information and opinions contained in comments developed by the Ground Water Forum are technical in nature and represent professional opinions of the participants. This information has not received formal EPA peer review and does not necessarily reflect the views of EPA or other participating organizations, and no official endorsement should be inferred. The information is not intended, nor can it be relied upon, to create any rights enforceable by any party in litigation with the United States or any other party. Use or mention of trade names does not constitute an endorsement or recommendation for use.*