



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

# The EPA Needs to Improve Management of Its School Environmental Health Efforts

Report No. 13-P-0201

March 27, 2013



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## Abbreviations

AHERA	Asbestos Hazard Emergency Response Act
CGHS	Clean Green and Healthy Schools
EISA	Energy Independence and Security Act
EPA	U. S. Environmental Protection Agency
FY	Fiscal Year
IAQ	Indoor Air Quality
IPM	Integrated Pest Management
OCHP	Office of Children's Health Protection
OECA	Office of Enforcement and Compliance Assistance
OIG	Office of the Inspector General

**Cover photo:** Image is from the EPA's Healthy School Environments website (EPA photo).

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# At a Glance

## Why We Did This Review

The Office of Inspector General of the U.S. Environmental Protection Agency conducted this evaluation to determine how effectively the EPA ensures the environment in schools is healthy for children. Specifically, we looked at how the EPA implements its school environmental health programs to protect children's health.

More than 60 million students and teachers attend over 130,000 public and private schools in the United States. Poor environmental conditions in schools can inhibit learning, increase absenteeism, and pose increased risks to children's health.

In fiscal year 2011, the agency launched the Clean Green and Healthy Schools initiative to support states and communities promoting healthier school environments. The initiative's vision is that children "will grow, learn and play in clean, green, and healthy schools."

### **This report addresses the following EPA Goal or Cross-Cutting Strategy:**

- *Working for environmental justice and children's health.*

For further information, contact our Office of Congressional and Public Affairs at (202) 566-2391.

The full report is at:  
[www.epa.gov/oig/reports/2013/20130327-13-P-0201.pdf](http://www.epa.gov/oig/reports/2013/20130327-13-P-0201.pdf)

## ***The EPA Needs to Improve Management of Its School Environmental Health Efforts***

### **What We Found**

The EPA established children's health as a priority. The EPA's work on environmental health in schools includes educating school officials about asbestos risks, developing a compliance tool for schools with drinking water violations, and providing grants. Further, many states base their laws for indoor air quality in schools on the EPA's work and tools.

The EPA created the Clean Green and Healthy Schools initiative to promote healthier school environments. However, the initiative lacks necessary management controls to ensure that the EPA provides consistent implementation of the program across the United States. The agency recently developed some measures for the initiative, but those measures are not specific enough to demonstrate program outcomes. In addition, regional staff may not be able to collect the data needed to determine how the initiative is improving environmental health in schools.

As the EPA works to improve initiative management, the agency needs to take into account the impact that funding reductions may have on its school environmental health efforts. The EPA has reduced funding for the CGHS initiative, as well as reduced or eliminated funding for some related school environmental health programs. Most notably, the EPA eliminated funding for its Indoor Air Quality Tools for Schools program, even though school personnel nationwide use the tools. Because of funding reductions, the EPA cut the scope of activities originally planned under the CGHS initiative, further reducing needed services to schools.

Finally, the EPA did not meet all requirements of the Healthy High-Performance Schools subtitle of the Energy Independence and Security Act. The agency was nearly 3 years late issuing school environmental health guidelines for states, which delayed assistance to the states. The EPA also did not report annually, resulting in Congress being uninformed about delays.

### **Recommendations and Planned Agency Corrective Actions**

The EPA should improve management controls for the CGHS initiative. This includes better planning, measures, and data collection procedures to ensure consistent regional implementation. The agency should also comply fully with the Energy Independence and Security Act. Finally, the EPA should regularly review its school environmental health programs to determine whether the agency provides sufficient regulatory and voluntary program services to address the risks to children's health in schools.

The agency agreed to all recommendations and provided corrective actions and completion dates. The recommendations remain open with corrective actions ongoing. No further response to this report is required.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

March 27, 2013

**MEMORANDUM**

**SUBJECT:** The EPA Needs to Improve Management of Its  
School Environmental Health Efforts  
Report No. 13-P-0201

**FROM:** Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is written over the printed name.

**TO:** Bob Perciasepe  
Deputy Administrator

Jackie Mosby, Acting Director  
Office of Children's Health Protection

This is our report on the subject evaluation conducted by the Office of Inspector General of the U.S. Environmental Protection Agency. This report describes the problems the OIG identified and makes recommendations to address these problems. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

**Action Required**

You are not required to provide a written response to this final report, because you agreed to all recommendations and provided corrective actions and completion dates that meet the intent of the recommendations. The recommendations remain open with corrective actions ongoing.

Should you choose to provide a response to this final report, we will post your response on the OIG's public website, along with our memorandum commenting on your response. You should provide your response as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended.

We have no objections to the further release of this report to the public. We will post this report to our website at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact Carolyn Copper, assistant inspector general for the Office of Program Evaluation, at (202) 566-0829 or [copper.carolyn@epa.gov](mailto:copper.carolyn@epa.gov); or Jerri Dorsey, acting director for Cross Media, at (919) 541-3601 or [dorsey.jerri@epa.gov](mailto:dorsey.jerri@epa.gov).

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# Chapter 1

## Introduction

### Purpose

The Office of Inspector General of the U.S. Environmental Protection Agency sought to determine how effectively the EPA ensures the environment in existing schools is healthy for children. Specifically, we focused on whether the EPA was effectively implementing programs directed at existing schools, and whether the Office of Children's Health had created enough program criteria to guide regional implementation. Further, we determined whether the EPA has data to measure program effectiveness, and how other programs are filling the gaps left by the defunding of some EPA Schools Programs over the last 5 years.

### Background

Children are more vulnerable to harmful environmental exposures, because their bodies are still developing and they eat, drink, and breathe more in proportion to their body size. Children's behavior also exposes them to potential hazards from chemicals, pesticides, and organisms.

Children's health has been a federal priority since 1997 when President Clinton signed Executive Order 13045. This order requires federal agencies to make the identification and assessment of children's environmental health and safety risks a high priority. This order further requires that federal agencies ensure that policies, programs, activities, and standards address environmental health and safety risks to children. The EPA Administrator made leadership in children's environmental health an agency priority. In a memorandum to the senior agency officers in February 2010, the Administrator stated: "[W]e must ensure that children's health protection is a driving force in our decisions." This agency priority fulfills Executive Order 13045.

The EPA's Strategic Plan sets forth an agency commitment "to preserve the environment for future generations and to protect human health in the places where people live, work, learn, and play." Inclusion of where people learn in this statement points to the key role environmental health in schools plays in children's health.

Poor environmental conditions in schools can inhibit learning, increase absenteeism, and pose increased risks to children's short- and long-term health. Five days a week, over 54 million students from kindergarten through 12th grade attend more than 130,000 public and private school facilities in the United States. Over seven million teachers and other employees work in these schools.

## ***The EPA's School-Based Efforts***

The EPA collaborates with others working to improve school environmental health, including children, families, teachers, school districts, advocacy organizations, state agencies, and other federal agencies. The EPA regulates some hazards in schools, such as asbestos; and assists states, school districts, and schools in addressing other unregulated hazards, such as mold. The EPA has implemented 10 programs that specifically target environmental and health risks in schools. The EPA features these 10 programs prominently on its “EPA Schools Programs” website.<sup>1</sup> For the purpose of this evaluation, we focused on the five programs that contribute to improving environmental health for children in existing school buildings. We describe these programs and some program results in Table 1.

The EPA has devoted considerable resources to educating school officials about the risks associated with asbestos and the management of those risks. The EPA also developed a compliance tool for schools with persistent drinking water violations. In 33 states and the District of Columbia, the EPA’s work on indoor air quality serves as the basis for laws requiring schools to develop and implement indoor air quality programs. Six of these laws specifically cite the EPA’s Indoor Air Quality Tools for Schools. Finally, the EPA periodically awarded grants for work aimed at improving school environmental health in areas such as indoor air quality, integrated pest management, chemical cleanout, and state environmental health programs.

The OCHP within the Administrator’s office is coordinating activities across agency programs and regions to enhance delivery of tools to promote healthy school environments. Most recently, in an effort to address environmental health in schools, the EPA requested funds for fiscal year 2011 to launch the Clean Green and Healthy Schools initiative to support states and communities promoting healthier school environments. OCHP formed the cross-agency School Coordination Group to collaborate and coordinate the CGHS initiative efforts. The EPA’s vision for the initiative is that “children, regardless of age, race, economic status, or ethnicity will grow, learn and play in clean, green, and healthy schools.”

To support this vision, the EPA will:

1. Work to increase understanding of chemical, biological, and physical hazards in schools, and encourage the use of resources to create healthier learning environments.
2. Build internal and external partnerships to support the development of clean, green, and healthy schools.

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<sup>1</sup> Healthy School Environments at <http://www.epa.gov/schools/programs.html>.

**Table 1: EPA Environmental Health Programs Serving Existing Schools**

Program	Description
Asbestos in Schools	The Asbestos Hazard Emergency Response Act became law in October 1986 as part of the Toxic Substances Control Act. Under AHERA and its regulations, schools are required to determine if their facilities have asbestos, develop a plan to remove or manage it, and then conduct ongoing management and risk assessment reviews if they decide to manage the asbestos in place. The EPA has conducted numerous inspections of schools and provided compliance assistance to help schools meet the requirements of the AHERA regulations.
Drinking Water in Schools	Under the Safe Drinking Water Act, the water supplier is responsible for the quality of the drinking water. Fewer than six percent of schools in the United States operate their own drinking water systems. The EPA's Office of Water and Office of Enforcement and Compliance Assistance worked together to identify schools that were out of compliance and developed a compliance tool for schools with persistent drinking water violations. Other efforts in schools to ensure safety of drinking water, such as testing for lead and other contaminants at drinking water faucets, are voluntary. The EPA provides information that assists all schools in these voluntary efforts.
Indoor Air Quality Tools for Schools Program	The EPA provided information and outreach to states and school districts on indoor air quality issues within schools for many years. Notably, the EPA created the Indoor Air Quality Tools for Schools and the Healthy School Environmental Assessment Tool. Because of these efforts, 33 States and the District of Columbia have established their own laws requiring that schools develop and implement indoor air quality programs.
Integrated Pest Management in Schools	Integrated Pest Management helps schools manage pests economically with the least possible hazard to health, property, and the environment. This effort includes reducing exposure to the pesticides, herbicides, and other chemicals used in schools and on school grounds. In November 2011, the EPA allocated additional funds to school IPM activities; created 10 regional school IPM positions; and initiated the establishment of a Center of Expertise in school IPM.
Schools Chemical Cleanout Campaign	The EPA's Schools Chemical Cleanout Campaign aimed to ensure that schools are free from hazards associated with mismanaged chemicals. The EPA provided schools information and tools to manage chemicals responsibly, and awarded grants to clean out old laboratory chemicals.

Source: OIG analysis of EPA and Environmental Law Institute publications and material.



## ***The Energy Independence and Security Act***

The Healthy High-Performance Schools subtitle of Title IV of the Energy Independence and Security Act of December 2007 tasked the EPA with four actions to improve school environmental health. The agency has completed three of the four actions. In October 2011, the EPA issued guidance on school siting. In September 2012, the EPA awarded five grants to states to provide technical assistance to schools and to develop and implement state school environmental health programs. In October 2012, the EPA issued guidelines for voluntary use by states in developing and implementing an environmental health program for schools. Finally, EISA required the EPA to report annually to Congress on all activities carried out under the Healthy High-Performance Schools subtitle. As of March 26, 2013, EPA has not reported to Congress.

## **Scope and Methodology**

We conducted this evaluation from January 2012 to December 2012, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for the results reported based upon our objectives.

The scope of our evaluation was limited to the EPA's programs that provide environmental health services to existing schools. We reviewed and assessed the scope, and achieved or anticipated outcomes for the 10 EPA Schools Programs listed on the EPA's healthy school environments website. We determined that five programs fell within our scope:

- Asbestos in Schools.
- Drinking Water in Schools.
- Indoor Air Quality Tools for Schools.
- Integrated Pest Management in Schools.
- Schools Chemical Cleanout Campaign.

We did not review programs that address the design of new buildings to eliminate potential hazards, the siting of new schools to contribute to community smart growth efforts, the reduction of emissions from school buses, energy consumption, or educating students about being safe in the sun.

The new CGHS initiative fell within our scope. In addition, we determined that three provisions of the EISA Healthy High-Performance Schools subtitle fell within our scope:

1. Awarding grants to states to provide technical assistance to schools, and develop and implement state school environmental health programs.

2. Issuing guidelines for voluntary use by states in developing and implementing an environmental health program for schools.
3. Reporting annually to Congress on all activities carried out under the Healthy High-Performance Schools subtitle.

We reviewed pertinent documents and interviewed officers, managers, and staff in OCHP and relevant EPA program offices. We received responses from all 10 EPA regions to a set of questions on school programs. We also received information from officers of three organizations that work with the EPA and others to improve school environmental health:

- IPM Institute of North America.
- Healthy Schools Network.
- American Association of School Administrators.

## Chapter 2

# The EPA Should Improve Management of School Environmental Health Efforts

The EPA's current school environmental health efforts need management and planning improvements to meet the agency priority of protecting children in the places where they learn. The new CGHS initiative lacks management controls and guidance necessary to ensure consistent implementation and data collection requirements to demonstrate outcomes. Further, the initiative's new vision and measures documents do not ask regions to address how they will achieve results after the EPA reduced or eliminated funding for several existing school programs. Finally, the EPA was nearly 3 years late issuing school environmental health guidelines for voluntary use by states, and has not reported annually to Congress as required by EISA. Without improving the management and planning of its school environmental health efforts, the EPA is at risk of not executing these efforts in the most effective way.

### **CGHS Initiative Needs Better Planning, Implementation, and Guidance**

The EPA created the CGHS initiative to build partnerships around healthy schools, increase understanding of hazards in schools, and encourage the use of resources to create healthier schools. We found that the initiative lacks necessary management controls, and the EPA has not yet developed guidelines and expectations that are specific enough to ensure consistent implementation. The EPA's vision and measures documents outline broad expectations for the initiative. However, the EPA has not required regions to develop implementation plans, establish specific outcomes, or identify how they will collect data to document those accomplishments. Without specific implementation plans and measures, OCHP and the regions are unlikely to achieve results. Without specific data collection requirements, OCHP and regions are unlikely to identify, collect, and analyze the data needed to determine the initiative's effectiveness.

#### ***Initiative Lacks Guidelines for Planning, Implementation, and Oversight***

The CGHS initiative does not have specific implementation guidelines. The School Coordination Group, composed of representatives from OCHP, the regions, and EPA program offices, developed a Vision, Goals, Objectives, and Activities or "Vision" document for the initiative. The Vision document outlines an overall vision, general programmatic goals, and broad activities for FYs 2013 and 2014. However, this Vision document does not take the place of specific implementation guidelines. Each region's program should meet the needs of the

states and school districts in their region; however, a national program also should have a core set of criteria that each region must meet.

The EPA also developed the CGHS Regional FY 2013 Developmental Measures or “Regional Measures” document that seemed to establish a core criterion for the initiative:

*Improve the health of school and child care environments by supporting state, tribal and local efforts to address environmental health issues in schools and child care centers, with a focus on the poorest performing schools, underserved communities and tribes.*

This criterion reiterates a sub-objective in OCHP’s strategic plan. However, the EPA did not include this criterion in its Vision document. The EPA lays out headquarters and regional output measures in the Regional Measures document that tabulate all school activities. The Regional Measures document does not require separate reporting of the focus activities. Without clear criteria and expectations, the EPA lacks assurance that headquarters and regions will focus their activities on the poorest performing schools, underserved communities, and tribes. Further, OCHP has not posted basic initiative information on its healthy schools website. In our opinion, this lack of information creates challenges for consistently communicating with both internal and external partners. Updating the website would be an effective method of communicating the initiative’s vision, goals, and plans, and should be part of OCHP’s implementation guidelines.

The Vision document does not require regions to develop region-specific implementation plans, identify specific outreach targets, or develop specific output and outcome levels. The EPA did not finalize the Vision document until October 9, 2012. Prior to this date, regional staff were unsure what the EPA expected them to achieve through the program. Some regions were reluctant to move forward in establishing their specific regional plans until the EPA finalized the national guidelines. However, according to the EPA’s Key Performance Indicators for FY 2012, the EPA was to establish implementation plans for OCHP and the regions by February 29, 2012.

The CGHS initiative lacks management controls to achieve desired outcomes. Current EPA guidance does not require regions to develop oversight processes, determine what services are needed, or determine if its services are meeting those needs. Furthermore, the initiative does not have oversight, evaluation, or assessment criteria. Without criteria, the EPA cannot improve the program or respond to changing customer needs. Regions also are not required to gather and disseminate best management practices, although OCHP developed the School Coordination Group to share this information informally. While the EPA recently developed program measures, the lack of planning and implementation requirements prevents the EPA from determining what outcomes it has achieved. The EPA also cannot report which schools have reduced environmental risks to

their students. As a result, the effectiveness of the CGHS initiative will remain unknown.

### ***CGHS Initiative Lacks Specific Outcome Measures***

The EPA completed its Regional Measures document on October 4, 2012. Regions will report the number of school decision-makers who receive information or participate in capacity building exercises. Regions plan to report the number of schools and school districts that have taken action to become cleaner, greener, and healthier. In addition, regions intend to track the number of external outreach forums or activities hosted or attended to promote the CGHS initiative. However, regional outcome measures are all narrative and qualitative. As such, the CGHS initiative lacks specific outcome measures.

The Regional Measures document states that during the baseline developmental period (FYs 2012 through 2014), the EPA will work to “craft realistic measures of progress and effectiveness that can be used for future reporting.” However, the EPA has not established implementation guidelines that specify how these revisions will be undertaken and what information it will use.

Before the EPA finalized the Regional Measures document, regional staff said that even if the EPA identified specific measures, collecting the needed data would be difficult. Regional staff said that without their own funding for data collection, they would have to rely on the data that the schools already collect. However, schools have very limited data collection budgets and are not always willing to release information to the EPA. This lack of direct data collection limits the EPA’s ability to determine what effects the initiative will have. It also prevents the EPA from knowing if the environmental health in existing schools has improved. As a result, the EPA will face challenges in collecting data and ensuring that the initiative’s activities consistently work to improve school environmental health for students and teachers across the United States.

### **CGHS Initiative Planning Should Consider Reductions in Related Program Funding and Priority**

The EPA has reduced or eliminated funding for several programs working to improve environmental health in schools, including the new CGHS initiative and programs that would have worked in conjunction with the initiative. Improving environmental quality in schools is a partnership among federal, state and local agencies, as well as with nongovernmental organizations. However, since 2008, the EPA has cut or defunded several programs that supported those partnerships. For example, the EPA eliminated the School Chemical Cleanout Campaign at the beginning of FY 2008, reducing the EPA’s ability to help schools manage hazardous wastes used in science laboratories and art classrooms. Even the newly launched school IPM program is experiencing reductions in grants. Additionally, the EPA eliminated funding for the IAQ Tools for Schools program designed to

improve indoor air quality, and reduced in priority another program intended to ensure schools manage asbestos in a safe manner.

OCHP and regional staff informed us that the EPA does not intend the CGHS initiative to take the place of the reduced and defunded school programs. When OCHP proposed the CGHS initiative, it could not foresee the potential programmatic and resource voids created by the EPA's most recent cuts to its mature school-related programs. Ten years ago, the Children's Health Protection Advisory Committee to the EPA recommended that the EPA "[e]valuate and document the effectiveness of existing EPA school environmental health programs, such as IAQ Tools for Schools." The EPA needs to conduct this type of evaluation to understand how the new initiative can improve its school environmental health efforts. Further, as OCHP and the regions work to improve their CGHS initiative planning, they need to take into account the impact that programmatic cuts have had on all of the EPA's school environmental health efforts.

### ***The EPA Cut CGHS Initiative Funding***

The EPA has reduced the funding for the CGHS initiative. OCHP requested at least 1.1 full-time equivalent positions per region to fund regional schools coordinators, but could only provide funding for the fourth quarter of FY 2011. In FY 2012, funding levels fell to less than 50 percent of what OCHP initially requested. The FY 2012 cuts also reduced headquarters staff support. OCHP requested one position to coordinate headquarters and regional school activities and to establish management controls, but this position was not funded. As a result, the EPA cut the scope of activities originally planned under the initiative, further reducing needed services to schools.

### ***The EPA Eliminated Indoor Air Quality Tools for Schools***

OCHP launched the CGHS initiative while the EPA fully funded its IAQ Tools for Schools program. The organization officers we interviewed on indoor air quality were concerned about the elimination in FY 2012 of IAQ Tools for Schools and other cuts to school environmental health programs. According to those we interviewed in and outside the EPA and the documents we reviewed, school personnel nationwide used the IAQ Tools for Schools. The tools formed the basis for school environmental health statutes in more than 30 states. The EPA's IAQ Tools for Schools program also integrated well with other EPA Schools Programs, such as school IPM. The program facilitated communication and sharing of best practices among school districts and others working to improve school environmental health. For example, over 2,300 teachers, school administrators, public health professionals, and others had been educated on school environmental health at the last five symposiums sponsored by the program. In addition, regional staff and an organization officer we interviewed expressed concern to us that the tools will not remain valuable assets if the EPA is

not continuing to update them. OCHP and the regions will need to take into account the new dormant status of IAQ Tools for Schools in their CGHS initiative plans.

In the absence of the IAQ Tools for Schools program, the EPA's Indoor Environments Division is working on ways to provide information and support, and maintain communication among those working to improve indoor air quality in schools. This effort includes the newly developed School Health and Indoor Environments Leadership Development Summit. The EPA held the first summit on July 12, 2012, with 72 representatives from federal agencies, school districts, nongovernmental organizations, industry, and universities. This summit has the potential to fill some of the programmatic void created by the loss of the annual IAQ Tools for Schools symposium. However, the summit is too new to measure or predict outcomes, and the EPA has not defined how the summit fits within the CGHS initiative.

### ***The EPA Reduced the Priority of Asbestos Inspections***

The EPA reduced the priority of the Asbestos in Schools program for FY 2013. In a March 9, 2012, memorandum, the principal deputy assistant administrator of the OECA advised EPA regions about programs that were to have their priority and funding reduced, including AHERA. The EPA proposed reducing AHERA spending in order to increase support to other compliance monitoring and enforcement priorities. The March 9, 2012, disinvestment plan proposed reducing AHERA enforcement resources to less than a fourth of the existing level.<sup>2</sup> Regions would still respond to situations involving egregious violations that present significant risks to human health; however, most routine inspections would cease.

The proposed reduction plan met with opposition from regional staff, program offices and others. Several regional staff informed us that this reduction would have a negative impact on their ability to keep children safe from asbestos. One regional manager told us: "With the de-funding of the AHERA Inspection Program, fewer schools are being inspected for compliance with the AHERA regulations. Hence, [fewer] school children are being protected from the potential exposure to asbestos." Another regional manager said, "The continued budget reductions that have supported EPA's AHERA regulatory enforcement program have had an adverse impact on the protection of children's health in schools. The Region's field surveillance work has found that local education agencies are not in compliance with the regulatory requirements of AHERA."

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<sup>2</sup> The full-time equivalent level for AHERA enforcement efforts in March 2012 was 5 positions, with 0.2 in headquarters and 4.7 among the 10 regions. The proposed reduced level was 1.1 positions, with 0.1 in headquarters and 1 among the 10 regions.

On June 6, 2012, the principal deputy assistant administrator, OECA, issued an update stating that, "[b]ased on regional and program input, OECA is no longer looking for a full budget adjustment plan" for AHERA. However, the June 6, 2012, correspondence also stated that OECA was still looking for regions to reduce their resources where possible. According to OECA, many schools successfully managed asbestos in place for decades. OECA explained that AHERA was a mature program that needed fewer resources to conduct inspections than in the past. However, the AHERA inspection is one of the few regulatory authorities the EPA has in schools. As such, reductions in AHERA inspections may increase overall environmental risks to children who attend primary and secondary schools, as those inspection reductions would lead to fewer opportunities for the EPA to be in the schools. As OECA changes compliance assistance or enforcement priorities for schools, OCHP and the regions may need to update their CGHS initiative plans to take into account these changes.

## **The EPA Did Not Meet All Requirements of EISA**

The EPA did not meet all requirements of the Healthy High-Performance Schools subtitle of EISA. The EPA was nearly 3 years late issuing guidelines for voluntary use by states developing and implementing a comprehensive environmental health program for schools. EISA mandated completion of the guidelines by December 19, 2009; however, the EPA did not issue draft guidelines until February 27, 2012. The agency received public comments on these draft guidelines through April 20, 2012, and published the final guidelines in October 2012. For nearly 3 years, some regions did not begin work on state-level school environmental health programs because they were awaiting guidance for the programs. As a result, the EPA did not provide support to states in the timeframe specified in EISA.

As of March 26, 2013, the EPA had made no reports to Congress on its activities carried out under the Healthy High-Performance Schools subtitle. EISA required that the EPA annually report to Congress on all activities carried out under the subtitle. On March 5, 2013, OCHP submitted its draft report to the Office of Management and Budget for review prior to issuing the report to Congress. The EPA failed to report to Congress on its inactivity and missed deadlines in the preceding 5 years. As a result, the EPA did not inform Congress and the public of its inaction through the required reporting process.



## Conclusion

The EPA needs to improve program implementation planning, management, and oversight to advance its efforts to reduce environmental health risks in schools. Further, the EPA needs to consider the impacts of changes to its Schools Programs, such as the elimination of IAQ Tools for Schools and the decrease in priority of asbestos inspections, in its long-term plans for the CGHS initiative. Finally, the EPA needs to report to Congress on its accomplishments and delays under the Healthy High-Performance Schools subtitle of EISA. By taking these actions, the EPA can implement effective programs that it has designed to protect the health of children in the places where they learn.

## Recommendations

To improve management of the EPA's school environmental health efforts, the EPA Deputy Administrator should:

1. Fulfill the requirement of EISA to report to Congress all activities carried out under the Healthy High-Performance Schools subtitle.

The Director of the Office of Children's Health Protection should:

2. Develop implementation guidelines and management controls that specify how:
  - a. OCHP will manage the adoption and implementation of the newly developed CGHS Vision, Goals, Objectives and Activities document, and the CGHS Regional FY 2013 Developmental Measures document.
  - b. OCHP will continue to craft realistic measures during FY 2013-2014.
3. Develop regional implementation guidelines and planning requirements for the CGHS initiative. These guidelines should:
  - a. Include requirements for each region to develop an implementation plan that is consistent with the measures, strategies, and expected outcomes identified in the CGHS Regional FY 2013 Developmental Measures document.
  - b. Specify how CGHS initiative staff will coordinate better with internal EPA and external partners, taking into account recent changes in program status and funding.
  - c. Specify how CGHS initiative staff will collect data, determine the programmatic success of the initiative, and modify the program to meet customer needs.

4. Develop assessment criteria and conduct regular reviews of the EPA's overall School Environmental Health programs to determine whether the EPA is providing sufficient regulatory and voluntary program services to address the risks to children's health in schools.

## **Agency Response and OIG Evaluation**

We received a response from the Deputy Administrator on January 29, 2013. After a meeting to discuss the response, we received an amended response from the acting director for OCHP dated February 12, 2013. The agency agreed to all four recommendations, and provided corrective actions and estimated completion dates that meet the intent of the recommendations. The recommendations remain open with corrective actions ongoing. No further response to this report is required. The agency's January and February 2013 responses are included in appendix A. We also modified the report to address appropriate technical comments we received from the agency.

## **Status of Recommendations and Potential Monetary Benefits**

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	12	Fulfill the requirement of EISA to report to Congress all activities carried out under the Healthy High-Performance Schools subtitle.	O	Deputy Administrator	3/31/13		
2	12	Develop implementation guidelines and management controls that specify how: <ul style="list-style-type: none"> <li>a. OCHP will manage the adoption and implementation of the newly developed CGHS Vision, Goals, Objectives and Activities document, and the CGHS Regional FY 2013 Developmental Measures document.</li> <li>b. OCHP will continue to craft realistic measures during FY 2013-2014.</li> </ul>	O	Director, Office of Children's Health Protection	9/30/13		
3	12	Develop regional implementation guidelines and planning requirements for the CGHS initiative. These guidelines should: <ul style="list-style-type: none"> <li>a. Include requirements for each region to develop an implementation plan that is consistent with the measures, strategies, and expected outcomes in the CGHS Regional FY 2013 Developmental Measures document.</li> <li>b. Specify how CGHS initiative staff will coordinate better with internal EPA and external partners, taking into account recent changes in program status and funding.</li> <li>c. Specify how CGHS initiative staff will collect data, determine the programmatic success of the initiative, and modify the program to meet customer needs.</li> </ul>	O	Director, Office of Children's Health Protection	9/30/13		
4	13	Develop assessment criteria and conduct regular reviews of the EPA's overall School Environmental Health programs to determine whether the EPA is providing sufficient regulatory and voluntary program services to address the risks to children's health in schools.	O	Director, Office of Children's Health Protection	12/31/13		

<sup>1</sup> O = Recommendation is open with agreed-to corrective actions pending.  
 C = Recommendation is closed with all agreed-to actions completed.  
 U = Recommendation is unresolved with resolution efforts in progress.

## ***Agency Response to Draft Report***

January 29, 2013

**SUBJECT:** Response to the Office of Inspector General Draft Report No. OPE-FY12-0004  
"EPA Needs to Improve Management of School Environmental Health Efforts,"  
December 27, 2012

**FROM:** Bob Perciasepe, Deputy Administrator

**TO:** Carolyn Copper, Assistant Inspector General for Program Evaluation

Thank you for the opportunity to respond to the issues and recommendations in the report "EPA Needs to Improve Management of School Environmental Health Efforts." Following is a summary of the agency's overall position, along with its position on each of the report recommendations. For those report recommendations with which the agency agrees, we have provided high-level corrective actions and estimated completion dates. For the report recommendations with which the agency does not agree, we demonstrate how the recommendation has been adequately addressed. For your consideration, we offer the technical comments attachment to supplement this response.

It is the EPA's position that, to date, the agency has met all requirements of the Healthy High-Performance Schools Subtitle of Title IV of the Energy Independence and Security Act, with the exception of the annual report to Congress. At the time of the Office of Inspector General audit report, the EPA had not completed the annual report to Congress. However, the report has since been drafted, and the Office of Children's Health Protection will actively work to expedite internal review of the report and submit it to the Office of Management and Budget. Submission of the report to Congress will fulfill the EPA's requirement to the Energy Independence and Security Act.

Protecting children's health and advancing environmental justice are key priorities for the EPA, and we are committed to reducing exposures to the environmental hazards children encounter in their daily lives. The EPA's mission to protect human health and the environment requires us to pay special attention to the vulnerabilities of those who are disproportionately affected by health challenges, especially our nation's children. Of particular note, the EPA's efforts toward encouraging the establishment of healthy school environments and meeting the requirements set forth under the Healthy High-Performance Schools Subtitle of Title IV of EISA are two critical examples of the type of work being done across the agency to protect children's health.

The EPA considers the health of children in all actions that we undertake and will continue to coordinate internally across our school-related programs and with other federal agencies and external partners to implement our goals and measures in a manner that accurately reflects current resource levels.

If you have any questions or need additional information, please contact either Jackie Mosby, acting director of the Office of Children's Health Protection, at (202) 566-0594 or [mosby.jackie@epa.gov](mailto:mosby.jackie@epa.gov) or Margot Brown, director of the program implementation and coordination division, at (202) 566-0874 or [brown.margot@epa.gov](mailto:brown.margot@epa.gov).

Attachment

AGENCY'S RESPONSE TO REPORT RECOMMENDATIONS

Agreements

No.	Recommendation	High-Level Intended Corrective Actions	Estimated Completion by Quarter and FY
1	Complete the requirement to EISA to report to Congress on all activities carried out under the Healthy High-Performance Schools Subtitle	1. Work to expedite internal review of report to Congress and submit report to OMB	2 <sup>nd</sup> Quarter FY13
3	Develop regional implementation guidelines and planning requirements for the Clean Green and Healthy Schools (CGHS) Initiative. The guidelines should: a. Include requirements for each region to develop and implement a plan that is consistent with the measures, strategies, and expected outcomes in the CGHS Regional FY 2013 Developmental Measures document  b. Specify how the staff will better coordinate with EPA internal and external partners, taking into account recent changes in funding; and  c. Specify how the CGHS Initiative staff will collect data, determine the programmatic success of the initiative, and modify the program to meet customer needs.	3.a. Require regions to develop implementation plans	4 <sup>th</sup> Quarter FY13
		3.b. Partner with EPA's Office of Air and Radiation to use the recently formed SHEILDS schools stakeholder network group to engage internal and external partners	3 <sup>rd</sup> Quarter FY13 4 <sup>th</sup> Quarter FY13
		3.c. Document a basic data collection plan (process may vary by region)	2 <sup>nd</sup> Quarter FY13
4.	Develop assessment criteria and conduct regular reviews of EPA's overall School Environmental Health programs to determine whether EPA is providing sufficient regulatory and voluntary program services to address the risks to children's health in schools.	4.a. Assess EPA's School Environmental Health programs through the existing Cross Cutting Fundamental Strategy review process (twice per year)	3 <sup>rd</sup> Quarter FY13 4 <sup>th</sup> Quarter FY13
		4.b. Assess EPA's School Environmental Health programs through the OCHP Strategic Plan (with Regional Measures) review process (end of the year)	1 <sup>st</sup> Quarter FY14

Disagreements

No.	Recommendation	Agency response explanation	Proposed Alternative
2	<p>Develop implementation guidelines and management controls specify how:</p> <p>a. OCHP will manage the adoption and implementation of newly developed CGHS Vision, Goals and Objectives (VGO) document and CGHS Regional FY 2013 Developmental Measures documents; and</p> <p>b. OCHP will continue to craft realistic measures in FY 2013-2014.</p>	<p>2.a. OCHP developed implementation guidelines and management controls through the schools Vision, Goals, and Objectives (VGO) document and the regional measures assessment document. OCHP will continue to manage the adoption of the schools VGO, OCHP Strategic Plan and Regional Measures through monthly Schools Coordinating Group (SCG) and Regional Schools Coordinators meetings.</p>	<p>OCHP in consultation with the SCG and the Regions should be granted the opportunity to implement the VGO and the regional “realistic” measures that reflect available resources made to the CGHS initiative at both the national and regional level.</p>
		<p>2.b. OCHP Schools Coordinator will continue to work with Regional Schools Coordinators to implement adoption of realistic measures for FY14</p>	<p>A change should be made in the report which states “OCHP will work with regions to develop realistic measures reflective of regional priorities and resources”</p>

February 12, 2013

**SUBJECT:** Amendment to the Response to the Office of Inspector General Draft Report No. OPE-FY12-0004 "EPA Needs to Improve Management of School Environmental Health Efforts", December 27, 2012

**FROM:** Jacqueline E. Mosby, MPH  
Acting Director, Office of Children's Health

**TO:** Carolyn Copper  
Assistant Inspector General, Office of Program Evaluation

Thank you for the opportunity to discuss the issues and recommendations in the report "EPA Needs to Improve Management of School Environmental Health Efforts" on February 5, 2013. We have reconsidered our response to include the following amendment.

Agreement

No.	Recommendation	High-Level Intended Corrective Actions	Estimated Completion by Quarter and FY
2	Develop implementation guidelines and management controls that specify how:  a. OCHP will manage the adoption and implementation of newly developed CGHS Vision, Goals and Objectives (VGO) document and CGHS Regional FY 2013 Developmental Measures documents; and  b. OCHP will continue to craft realistic measures in FY 2013-2014.	2.a. OCHP will develop an implementation plan to manage the adoption of the VGO and CGHS Regional FY 13 Developmental Measures.	3 <sup>rd</sup> Quarter FY13
		2.b. OCHP Schools Coordinator will continue to work with Regional Schools Coordinator to implement adoption of realistic measures for FY 14.	4 <sup>th</sup> Quarter FY13

**CONTACT INFORMATION**

If you have any questions regarding this response, please contact Khesha Reed, Associate Director of the Office of Children's Health Protection on (202) 566-0594 or Margot Brown, Director of the Program Implementation and Coordination Division (202)566-0874.

cc: Margot Brown, Office of Children's Health Protection  
Khesha Reed, Office of Children's Health Protection  
Patricia Gilchrist, Office of Executive Services

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