



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

Environmental Job Training Program Implemented Well, But Focus Needed on Possible Duplication With Other EPA Programs

Report No. 12-P-0843

September 21, 2012



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Abbreviations

EPA	U.S. Environmental Protection Agency
EWDJT	Environmental Workforce Development and Job Training
FY	Fiscal Year
GAO	U.S. Government Accountability Office
OIG	Office of Inspector General
OSWER	Office of Solid Waste and Emergency Response
SuperJTI	Superfund Job Training Initiative

Cover photo: Students in Richmond, California's, Job Training Program. (EPA photo)

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At a Glance

Why We Did This Review

We conducted this review to determine whether the U.S. Environmental Protection Agency's (EPA's) Environmental Workforce Development and Job Training (Environmental Job Training) program is addressing its program goals and whether duplications may occur with other EPA job training programs. The broad goals of the Environmental Job Training program are to recruit and teach individuals from solid and hazardous waste-impacted communities the skills needed to secure employment in the environmental field. Recruitment focuses on low-income, minority, unemployed, and under-employed people. Training focuses on assessment and cleanup of contaminated sites, health and safety, and other environmental skills. In fiscal year 2011, the first year of the program, EPA awarded 22 job-training grants collectively valued at more than \$6.5 million.

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

- *Cleaning up communities and advancing sustainable development*

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/2012/20120921-12-P-0843.pdf

Environmental Job Training Program Implemented Well, But Focus Needed on Possible Duplication With Other EPA Programs

What We Found

EPA effectively established and adhered to competitive criteria that resulted in the selection of job training proposals that addressed the broad goals of the Environmental Job Training program. However, EPA did not have internal controls to identify and prevent duplication with other EPA job training programs. Consequently, there is some risk of duplication in EPA awards for job training programs. Other EPA programs that could possibly duplicate Environmental Job Training activities include the:

- Superfund Job Training Initiative (SuperJTI) job readiness program
- Surveys, Studies, Investigations, Training and Special Purpose Activities Relating to Environmental Justice grant program
- Environmental Justice Small Grant Program

EPA recognizes the need to identify possible duplication. In fiscal year 2012, EPA added a requirement to its Environmental Job Training grant application for applicants to demonstrate that their proposed project will complement, but not duplicate, other federally funded environmental job training programs. However, assigning a determination of duplication to an applicant may be an ineffective internal control unless EPA has assurance that applicants possess the necessary knowledge and skills to perform the duplication determination.

Effective internal controls should identify all EPA job training programs with similar goals and include measurable individual program contributions or outcomes to meet these goals. This would provide a basis for integrating potentially duplicative, overlapping, or complementary job training programs.

Recommendation and Planned Agency Corrective Action

We recommend that the Assistant Administrator for Solid Waste and Emergency Response establish internal controls for coordination with other EPA-funded job training programs to prevent duplication of effort and spending. The Agency agreed with the findings and recommendation in this report, committed to work to improve internal controls in order to better identify and prevent duplication with other EPA job training programs, and provided a milestone completion date for the recommendation.



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

THE INSPECTOR GENERAL

September 21, 2012

MEMORANDUM

SUBJECT: Environmental Job Training Program Implemented Well, But Focus Needed on Possible Duplication With Other EPA Programs
Report No. 12-P-0843

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: Mathy Stanislaus
Assistant Administrator for Solid Waste and Emergency Response

This is our report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position.

Action Required

Because you have provided a corrective action plan with a milestone date, you are not required to provide a written response to this final report. Should you choose to provide a response, your response will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal. 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 at (202) 566-0829 or copper.carolyn@epa.gov; or Chad Kincheloe at (312) 886-6530 or kincheloe.chad@epa.gov.

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Chapter 1

Introduction

Purpose

We conducted this review to determine whether the U.S. Environmental Protection Agency's (EPA's) Environmental Workforce Development and Job Training (EWDJT, or Environmental Job Training) program is addressing its program objectives. We also evaluated possible duplication with other EPA job training programs. We asked the following questions:

- How is the Environmental Job Training program implemented and is this implementation achieving its targeted goals?
- How is the Environmental Job Training program different from other EPA workforce development and job training grant programs and is there any duplication?

Background

Program Goals and Overview

The broad goals of the Environmental Job Training competitive grant program are to:

- Recruit and teach individuals from solid and hazardous waste-impacted communities the skills needed to secure full-time, sustainable employment in the environmental field
- Focus recruitment on low-income, minority, unemployed, and under-employed people

Job training within the program focus on assessment and cleanup of contaminated sites, health and safety, and other environmental skills. According to EPA, these grants help prepare people for green jobs that reduce environmental contamination and provide more sustainable futures for the communities most affected by solid and hazardous waste contamination.

The Environmental Job Training program was created as an expansion of and replacement for EPA's Brownfields Job Training program. The Office of Brownfields and Land Revitalization led the effort to create the program to more closely collaborate on workforce development and job training with other programs within EPA's Office of Solid Waste and Emergency Response. The Environmental Job Training program now includes expanded training in other environmental media outside the traditional scope of just brownfields. In fiscal

year (FY) 2011, the first year of the program, EPA awarded 22 job-training grants collectively valued at more than \$6.5 million.

Government Focus on Duplication and Overlap

The U.S. Government Accountability Office (GAO) reports annually on selected federal programs that have duplicative goals or activities. GAO defines duplication as when two or more agencies or programs are engaged in the same activities or provide the same services to the same beneficiaries. GAO states that programs overlap when they have similar goals, devise similar strategies and activities to achieve those goals, or target similar users. The term “potential duplication” is used by GAO where information has not been available that would provide conclusive evidence of duplication or overlap.

According to GAO, the Government Performance and Results Act Modernization Act of 2010 includes a focus on identifying federal programs with duplicative goals and activities. The Act requires each agency to identify the various federal organizations and activities contributing to its goals. Each agency must also describe how the agency is working with other agencies to achieve its goals. Performance indicators to measure overall progress toward these goals as well as the individual contribution of the underlying agencies and federal activities are also required. These requirements provide a basis for integrating potentially duplicative or overlapping federal activities.

EPA’s 2009–2013 Grants Management Plan recognizes that effective grants management “requires reducing or eliminating unnecessary duplication of effort.” EPA’s plan includes an Agency goal to “support the Agency’s vision of managing grants to further EPA’s mission of protecting human health and the environment in accordance with the highest stewardship and fiduciary standards.”

The president’s 2013 proposed EPA budget states that reducing duplicative, overlapping, or underperforming activities across government is essential to ensure that taxpayer dollars are spent efficiently.

Scope and Methodology

We conducted this evaluation from December 2011 through August 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 evaluation objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our evaluation objective.

We interviewed Office of Brownfields and Land Revitalization staff and managers responsible for implementation, design, and oversight of the

Environmental Job Training program. Because results from the awarded FY 2011 grants were not available when we started our review, we evaluated EPA's implementation of the grant selection and awarding process for the first year of the program. We reviewed the implementation of the Office of Brownfields and Land Revitalization's Environmental Job Training grant selection process to determine whether the process established selection criteria based on and linked to its program goals. We compared how all 22 selected FY 2011 Environmental Job Training grants addressed EPA's selection criteria.

We identified other EPA job training programs with the potential for duplication with the Environmental Job Training program by searching official government records and databases. Our search criteria were key words for the populations, communities, and training targeted by the Environmental Job Training program. Our search identified over 30 EPA programs meeting one or more of the criteria. For programs meeting more than one criterion, we reviewed the program description and other information available and, where applicable, contacted the EPA program offices to verify the potential for duplication with the Environmental Job Training program.

Chapter 2

Selected Grants Addressed Goals, But Possibility for Duplication Exists

EPA effectively established and adhered to competitive criteria that resulted in selection of job training proposals that addressed the broad goals of the Environmental Job Training program. However, internal controls to identify and prevent duplication with other EPA job training programs were not in place. We identified other EPA programs with potential to duplicate Environmental Job Training program activities. Consequently, there is some risk of duplication in EPA awards for job training programs.

Selected Grants Addressed Environmental Job Training Goals

FY 2011 grant recipients were selected by the Assistant Administrator for Solid Waste and Emergency Response based on highest rank and other applicable factors. Selected grantees first passed the threshold eligibility criteria,¹ and were then scored according to the ranking criteria.² We found evidence that all 22 selected grantees addressed program goals in their applications.

Possible Duplication With Other EPA Job Training Programs

The Environmental Job Training program did not have internal controls to identify and prevent duplication with other EPA-funded environmental job training programs.

Other EPA Programs With Potential for Duplicating Environmental Job Training Activities

We identified other EPA programs that could possibly duplicate Environmental Job Training activities. Potentially duplicative activities included:

- Providing job skills training to secure full-time employment in the environmental field
- Job search or placement activities
- Targeting similar populations (e.g., minorities, low income, unemployed, and under-employed)
- Serving communities affected by hazardous waste sites

¹ Threshold eligibility criteria included applicant eligibility, required training, and funding amount.

² Ranking criteria included community need, training program description and anticipated outcomes and outputs, programmatic capability, institutional capacity, community and employer partnerships, and budget/resources.

For example, the *Superfund Job Training Initiative* (SuperJTI) contract program is a job readiness program that provides training and employment opportunities for citizens living in communities affected by hazardous waste sites. Many of these areas are environmental justice communities and minority and low-income neighborhoods. SuperJTI trainees acquire skills to work on environmental remediation projects, Superfund site cleanup projects, and construction projects.

The *Surveys, Studies, Investigations, Training and Special Purpose Activities Relating to Environmental Justice* grant program and the *Environmental Justice Small Grant Program* included activities similar to the Environmental Job Training Program. Similar activities included recruiting, training, and securing full-time employment. Projects selected for these other programs could also be from communities impacted by solid and hazardous waste.

Lack of Internal Controls Risks Duplication

The Environmental Job Training program does not have internal controls in place to identify and prevent duplication of EPA efforts and spending. Such internal controls could include formal policies, written procedures, or required checklists to prevent duplication of EPA efforts and spending. Consequently, there is some risk of duplication in EPA awards for job training programs by not having internal controls to prevent duplication.

Job Training Activities Must Complement But Not Duplicate

EPA recognizes the need to identify possible duplication. In FY 2012, EPA added a requirement to its Environmental Job Training grant application for applicants to demonstrate that their proposed project will complement, but not duplicate, other federally funded environmental job training programs. However, assigning a determination of duplication to an applicant may not be an effective internal control unless EPA has assurance that applicants possess the necessary knowledge and skills to perform this activity.

Conclusion

EPA effectively established the Environmental Job Training grant application criteria for FY 2011. This resulted in selection of grantees that addressed EPA program goals. However, the Environmental Job Training program does not have internal controls to identify and prevent duplication with other EPA-funded programs. The Environmental Job Training program needs to create internal controls to reduce or eliminate the risk of duplication in awarding EPA funds through the Environmental Job Training program and other EPA programs. Effective internal controls should identify all EPA job training programs with similar goals and include measurable individual program contributions or outcomes to meet these goals. This would provide a basis for integrating potentially duplicative, overlapping, or complementary job training programs.

Recommendation

We recommend the Assistant Administrator for Solid Waste and Emergency Response:

1. Establish internal controls for coordination with other EPA-funded job training programs to prevent duplication of effort and spending.

Agency Response and OIG Evaluation

The Office of Solid Waste and Emergency Response (OSWER) agreed with the findings and recommendation in this report, and committed to work to improve internal controls in order to better identify and prevent duplication with other EPA job training programs. We reviewed OSWER's comments and made changes to the report as appropriate. Appendix A provides the full text of OSWER's response and the OIG's comments.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	6	Establish internal controls for coordination with other EPA-funded job training programs to prevent duplication of effort and spending.	O	Assistant Administrator for Solid Waste and Emergency Response	9/30/13		

¹ 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 and OIG Comment

MEMORANDUM

SUBJECT: Response to Draft Audit Report, “Environmental Job Training Program Implemented Well, But Focus Needed on Possible Duplication With Other EPA Programs” Project No. OPE-FY12-2506

FROM: Mathy Stanislaus
Assistant Administrator

TO: Carolyn Copper
Assistant Inspector General for Program Evaluation

Thank you for the opportunity to comment on the issues and recommendations in the subject audit draft report. We agree with the findings and recommendation in this report, and we will work to improve internal controls in order to better identify and prevent duplication with other EPA job training programs. Our comments on the report and recommendation are below.

Comment on the Report

Please note on page 4 of the draft report that “job readiness training” is not an eligible use of grant funds under the Environmental Workforce Development and Job Training (EWDJT) Program, as stated on page 7 of the EWDJT Application Guidelines.
<http://www.epa.gov/oswer/docs/grants/epa-oswer-oblr-11-01.pdf>

OIG Response: OSWER’s cited source, “EWDJT Application Guidelines,” for “job readiness training,” is specific to the ineligibility of grant funds for the purpose of “job readiness training” for developing resumes and acquiring interview skills. The OIG report’s context is specific to the SuperJTI contract program described as a job readiness program that provides training to work on environmental remediation and clean-up projects. To avoid any misunderstanding or confusion, the OIG has removed the word “readiness” from the first bullet under the report section titled “Other EPA Programs With Potential for Duplicating Environmental Job Training Activities.” We retained “readiness” in the specific context of the SuperJTI program.

Specific Recommendation and Response

Recommendation: Establish internal controls for coordination with other EPA-funded job training programs to prevent duplication of effort and spending.

Response: We will add language under the current “demonstration of non-duplication” threshold criterion in the EWDJT Application Guidelines that states “applicants must demonstrate the proposed training project does not duplicate other federally-funded programs for environmental job training in the target community. This will include the programs currently listed, as well as the Superfund Job Training Initiative; the Environmental Justice Small Grants Program CFDA 66.604; and the Surveys, Studies, Investigations, Training, and Special Purpose Activities Relating to Environmental Justice grants program CFDA 66.309.” In addition, OSWER’s Office of Brownfields and Land Revitalization and Office of Superfund Remediation and Technology Innovation will work with the Office of Environmental Justice (OEJ) to conduct an internal review of proposals submitted in response to future competitions to help avoid potential duplication. This potential duplication screening has already been initiated as part of a threshold review with the National Institute of Environmental Health Sciences (NIEHS) and the Department of Labor (DOL). These changes will be implemented for the FY13 EWDJT grant competition. The release date of the FY13 RFP has not yet been determined.

OIG Response: The OIG recognizes OSWER’s commitment to work with the Office of Environmental Justice to conduct an internal review of other EPA-funded job training programs as addressing the intent of the OIG recommendation. The OIG accepts the completion date for the above corrective action plan to be no later than the end of FY 2013 (September 30, 2013).

OSWER’s response indicates that it intends to continue the practice of assigning a determination of duplication to the applicant. OSWER stated that language will be added under the current “demonstration of non-duplication” threshold criterion in the EWDJT Application Guidelines that states applicants must demonstrate the proposed training project does not duplicate other federally-funded programs for environmental job training in the target community.

The OIG continues to maintain, as stated in this report, that assigning a determination of duplication to an applicant may be an ineffective internal control unless EPA has assurance that applicants possess the necessary knowledge and skills to perform the duplication determination.

If you have any questions regarding this response, please contact David Lloyd at 202-566-2731 Lloyd.DavidR@epa.gov or Gail Cooper at 202-566-0168 Cooper.GailAnn@epa.gov.

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