



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL



Spending Taxpayers Dollars

EPA Cannot Assess Results and Benefits of Its Environmental Education Program

Report No. 16-P-0246

July 29, 2016



Report Contributors:

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Andre von Hoyer II
Ben Beeson

Abbreviations

| | |
|--------|--|
| EPA | U.S. Environmental Protection Agency |
| GAO | U.S. Government Accountability Office |
| GPRAMA | Government Performance and Results Act Modernization Act of 2010 |
| NEEAC | National Environmental Education Advisory Council |
| OEE | Office of Environmental Education |
| OIG | Office of Inspector General |
| OMB | Office of Management and Budget |

Cover photo: Students in a science class. (EPA photo)

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At a Glance

Why We Did This Review

We reviewed the U.S. Environmental Protection Agency (EPA) Office of Environmental Education's (OEE's) actions to address recommendations in the National Environmental Education Advisory Council's 2005 report to Congress, and to assess program benefits.

The National Environmental Education Act of 1990 established the EPA's OEE to develop and support programs to improve understanding of the environment, as well as curricula, educational material and training programs; and to manage grant assistance. The act created the National Environmental Education Advisory Council to advise, and make recommendations to, the EPA Administrator about the program. OEE awarded over \$16 million in grant funds for fiscal years 2012 through 2014.

This report addresses the following EPA goal or cross-agency strategy:

- *Embracing EPA as a high-performing organization.*

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Listing of [OIG reports](#).

EPA Cannot Assess Results and Benefits of Its Environmental Education Program

What We Found

OEE took some steps to address the National Environmental Education Advisory Council's recommendations, but was not timely in implementing recommendations. Also, key performance management activities remain incomplete. Specifically, regarding the council's 2005 recommendations, OEE:

Continued EPA funding for environmental education without program and performance management controls creates high risk for waste and abuse of public funds.

- Developed the framework and tools to measure the environmental education program, but did not execute or update those tools to assess comprehensive program results.
- Implemented research initiatives to improve environmental literacy and stewardship, but did not assess the effectiveness of these initiatives toward achieving OEE program performance goals.
- Funded programs to improve educators' ability to teach environmental concepts, but did not assess the effectiveness of the programs toward achieving OEE performance goals.

Further, OEE did not get consistent data from grantees and synthesize program performance data and report results. Program performance data is emphasized in OEE's 2006 strategic plan, the National Environmental Education Advisory Council's 2005 recommendations, federal guidance and EPA policy. After 2005, the OEE did not fund and convene the council to engage in the business of the council as required by the act until 2012. Thus, the council was not always able to provide advice to the Administrator, or congressionally required reports, on the extent and quality of environmental education in the nation.

OEE lacks internal program assessment controls, an updated strategic plan, and performance reporting requirements for grantees that are connected to strategic measures. As a result, OEE is significantly impaired in its ability to provide evidence of program results and benefits, manage the program to achieve results, or spot waste and abuse.

Recommendations and Agency Response

We made eight recommendations to the Associate Administrator for Public Engagement and Environmental Education, including that OEE assess and report comprehensive results and benefits of its environmental education program, ensure that the National Environmental Education Advisory Council is appointed and submits required reports to Congress, and promptly resolve the council's recommendations. OEE disagreed with most of the findings in our draft report. Subsequent to our meeting with OEE, two recommendations are resolved and closed, four recommendations are resolved and open, and two recommendations are unresolved with resolution efforts in progress.



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

THE INSPECTOR GENERAL

July 29, 2016

MEMORANDUM

SUBJECT: EPA Cannot Assess Results and Benefits of Its Environmental Education Program
Report No. 16-P-0246

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: Micah Ragland, Associate Administrator
Office of Public Engagement and Environmental Education

This is our report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). The project number for this evaluation was OPE-FY15-0001. 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 EPA position.

The EPA's Office of Public Engagement and Environmental Education is responsible for the recommendations in this report.

Action Required

Two of the eight OIG recommendations in this final report are unresolved. In accordance with EPA Manual 2750, we are requesting a meeting of action officials from the Office of Public Engagement and Environmental Education and the OIG's Office of Program Evaluation to start the resolution process. If resolution is not reached within 30 days, the agency action officials are required to complete and submit a dispute-resolution request to the EPA's Chief Financial Officer.

We will post this report to our website at www.epa.gov/oig.

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Chapter 1

Introduction

Purpose

We reviewed actions taken by the U.S. Environmental Protection Agency (EPA) to address recommendations from a 2005 report to Congress by the National Environmental Education Advisory Council (NEEAC) on the status of environmental education. The NEEAC was established by Congress to advise, consult with and make recommendations to the Administrator on matters relating to activities, functions and policies of the agency. The 2005 NEEAC report described the status of environmental education in the United States and included recommendations to improve environmental education.

Based on the NEEAC recommendations, we sought to assess whether:

- The EPA has developed the framework and tools to allow for the measurement of the environmental education program.
- Research initiatives have been implemented to assess the effectiveness of the environmental education program to improve environmental literacy and stewardship.
- Programs have been developed to improve the ability of educators to teach environmental concepts.
- The EPA derives benefits from its environmental education program.

Background

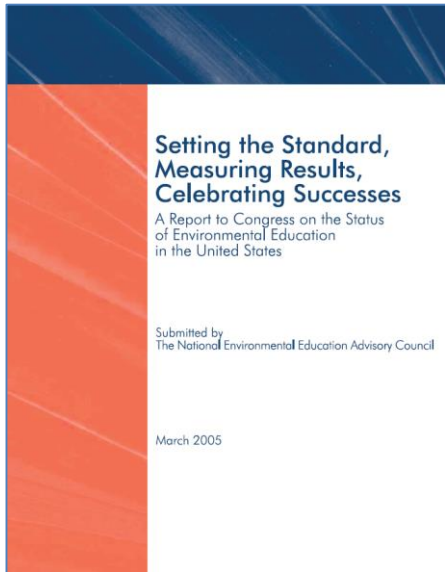
According to an EPA [webpage on environmental education](#), environmental education is a process that allows individuals to explore environmental issues, engage in problem solving, and take action to improve the environment. As a result, individuals develop a deeper understanding of environmental issues and have the skills to make informed and responsible decisions.

The National Environmental Education Act of 1990 directed the EPA Administrator to establish the Office of Environmental Education (OEE). Among other things, the act directed that OEE:

- Develop and support programs and related efforts to improve understanding of the natural and built environment, and the relationship between people and the environment, including the global aspects of environmental problems.

- Develop and support the widest possible dissemination of model curricula, education materials, training programs, and environmental education and training for education professionals.
- Manage federal grant assistance to education organizations, internships and fellowships, environmental awards, and other purposes.

Key Requirements of National Environmental Education Act of 1990



The cover of the 2005 NEEAC report.

The National Environmental Education Act of 1990 established the NEEAC, whose 11 members are appointed for 3-year terms and receive compensation when engaged in the actual performance of duties vested in the council. NEEAC advises and consults with the EPA Administrator on implementing the act. The act directs NEEAC to report to Congress “within 24 months of enactment of the Act and biennially thereafter” on the extent and quality of environmental education in the nation, and make recommendations for actions supportive of the act’s goals. Additional reporting requirements include generally describing activities over the previous 2-year period, summarizing major obstacles to improving environmental education, and making recommendations addressing such obstacles. The March 2005 NEEAC report to Congress on the status of environmental education in the United States made eight recommendations for the EPA’s action.

- | 2005 NEEAC Recommendations | |
|-----------------------------------|---|
| 1. | Update the National Environmental Education Act for the 21st century. |
| 2. | Broaden the audience and leadership of the environmental education field. |
| 3. | Improve the quality, accessibility and dissemination of environmental education materials and programs. |
| 4. | Develop a framework and tools for measuring the effectiveness of environmental education. |
| 5. | Support and strengthen long-term research initiatives. |
| 6. | Establish an outcome-based grant program to enable states, territories, and tribes to deliver environmental education programs and services. |
| 7. | Develop assessment-based professional development programs for formal and nonformal educators to improve their ability to teach environmental concepts and skills to learners of all ages. |
| 8. | Build public understanding of the value of environmental education and increase the number and diversity of talented young people pursuing environmental careers. |

Source: 2005 NEEAC Report to Congress, *Setting the Standard, Measuring Results, Celebrating Successes*.

The act requires 63 percent of the OEE budget to be awarded in grants. The act apportions appropriated funds in each fiscal year, in part, such that the 63 percent of the OEE environmental education funds are split between grants for the operation of the environmental education and training program (25 percent), and for environmental education (38 percent). OEE awarded over \$16 million in grant funds for fiscal years 2012 through 2014. The remaining 37 percent of funds are apportioned as follows:

- 25 percent for OEE office activities, including OEE and NEEAC salaries, some regional support, administrative costs, and discretionary activities such as research and federal partnership programs.
- 10 percent for the National Environmental Education and Training Foundation, established by the act to extend the contribution for environmental education and training to meeting critical environmental protection needs in the United States and abroad.
- 2 percent for national environmental education awards.

The act requires a review and evaluation by the agency of the environmental education and training program established under the National Environmental Education Act, which is operated by a grantee, to determine if the quality of the program warrants continued support. The purpose of the environmental education and training program is to train educational professionals in the development and delivery of environmental education and training programs and studies.

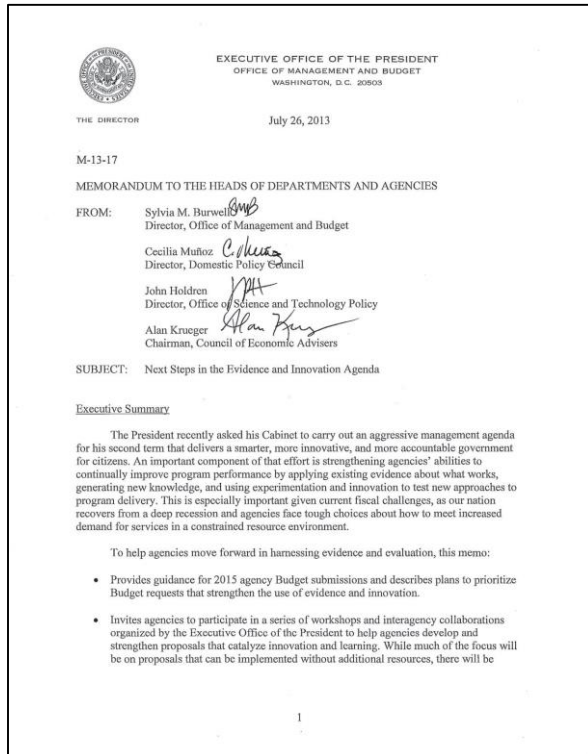
The act further requires that environmental education projects funded by environmental education grants under the National Environmental Education Act are evaluated for results by the program office. The act states that environmental education projects should design, demonstrate or disseminate practices, methods or techniques related to environmental education and training.

Additional Federal and EPA Guidance

The Government Performance and Results Act Modernization Act of 2010 (GPRAMA) states that a federal agency's strategic plan shall cover a period of not less than 4 years following the fiscal year in which the plan is submitted. As needed, the head of the agency may make adjustments to the strategic plan to reflect significant changes in the environment in which the agency is operating. Each agency shall make adjustments to its strategic plan to make the plan consistent with the requirements of this act.

GPRAMA requires agencies to assess whether relevant organizations, program activities and other activities are contributing as planned to the agency priority goals. Performance information is needed for this assessment.

GPRAMA defines an “output” measure as the tabulation, calculation or recording of activity or effort that can be expressed in a quantitative or qualitative manner. The act further defines an “outcome” measure as an assessment of the *results* of a program activity compared to its intended purpose.



The cover of 2013 OMB Memorandum M-13-17.

The July 2013 Office of Management and Budget (OMB) memorandum, *Next Steps in the Evidence and Innovation Agenda*, addressed prioritizing budget requests that use evidence and innovation. In discussing how evidence should be used, the OMB stated that evaluations should measure outcomes relevant for assessing whether a program achieves goals, that evidence shows credible evidence of impacts, and that agencies should improve grant designs to focus federal dollars on effective practices. The OMB memorandum also asks agencies to develop evidence for improving programs and measure outcomes relevant for judging whether programs achieve goals. OMB further states that, “Agencies are encouraged to allocate resources to programs and practices backed by strong evidence of effectiveness while trimming activities that evidence shows are not effective.”

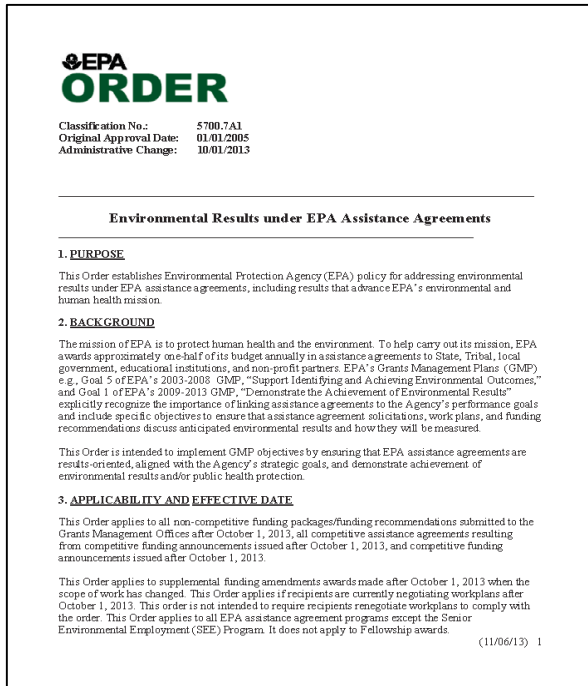
OMB Circular A-123 states that management is responsible for developing and maintaining effective internal control over program operations. Effective internal control provides assurance that significant weaknesses in the design or operation of internal control that could adversely affect the agency’s ability to meet its objectives should be prevented or detected in a timely manner. OMB Circular A-123 requires continuous monitoring and testing to help identify poorly designed or ineffective controls, and these controls should be reported upon periodically. Management is then responsible for redesigning or improving upon those internal controls. Management is also responsible for communicating the objectives of internal control and ensuring the organization is committed to sustaining an effective internal control environment.

The U.S. Government Accountability Office’s (GAO’s) *Standards for Internal Control in the Federal Government* defines internal control in part by stating that internal control is a process effected by an entity’s oversight body, and provides reasonable assurance that the objectives of the entity will be achieved. The standards note an organization’s management should do the following:

GAO Standards for Internal Control

- Provide reasonable assurance for effective and efficient operations.
- Provide reliable internal and external reporting.
- Provide that applicable laws and regulations are followed.
- Discuss management's role for assessing performance over time.
- Ensure that the findings of audits and other reviews are promptly resolved.¹

Source: GAO *Standards for Internal Control in the Federal Government*, September 2014.



The cover of EPA Order 5700.7A1, October 2013.

EPA Order 5700.7A1, *Environmental Results under EPA Assistance Agreements*, requires grant performance assessment and reporting. Program offices and National Program Managers must ensure that competitive funding announcements, work plans, funding recommendations and performance reports contribute to the agency's programmatic goals and objectives. Assistance agreements should demonstrate achievement of environmental results and/or public health protection, and their results should be reviewed and reported. Further, EPA policy specifies that program offices must report on significant results from completed assistance agreements through reporting processes established by the National Program Manager. National Program Managers must report significant results from completed assistance agreements as part of the agency's Annual Performance Report process and in internal evaluation systems.

OEE Strategic Plan

In 2006, OEE developed its first strategic plan in response to a Program Assessment Rating Tool assessment conducted by OMB. The OEE strategic plan contains 35 measures to analyze and assess the environmental education program. The plan includes performance measures that will be used to gauge and measure progress toward achieving OEE's environmental results, and serves as the

¹ The GAO *Standards for Internal Control in the Federal Government* requires the resolution of findings and recommendations. *Government Auditing Standards*, 2011 Revision, Chapter 7, Part 7.28, states that recommendations are made to correct deficiencies and other findings identified; and to improve programs and operations when the potential for improvement in programs, operations and performance is substantiated by the reported findings and conclusions. Further, it states recommendations flow logically from the findings and conclusions, are directed at resolving the cause of identified deficiencies and findings, and clearly state the actions recommended.

foundation for OEE's planning, budgeting, performance and accountability processes. The 2006 strategic plan stated that some of the measures were scheduled to be completed by 2008, and measures for future years had yet to be developed.

Responsible Office

The EPA's Office of Public Engagement and Environmental Education, within the Office of the Administrator, is responsible for the recommendations in this report.

Scope and Methodology

We conducted our work from November 2014 through January 2016. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In conducting our work, we interviewed OEE, NEEAC and EPA Office of Environmental Information personnel; reviewed applicable federal and EPA guidance; and requested and reviewed available environmental education data, including budget information for fiscal years 2012 through 2014.

Chapter 2

Environmental Education Program Results Not Assessed

OEE stated it had developed the framework and tools to measure the environmental education program, funded research to improve environmental literacy and stewardship, and funded programs to improve educators' ability to teach environmental concepts. However, OEE did not obtain and assess program performance data and report results as required by the National Environmental Education Act of 1990 and other guidance. This was because OEE lacked internal controls to manage and oversee the program. OEE has not assessed overall program results, and does not have effective controls for overall program assessment. As a result, OEE is significantly impaired in its ability to provide evidence of program results and benefits, manage the program to achieve results, and spot waste and abuse.

OEE Provided Funds and Achieved Some Outputs

OEE funded research initiatives on environmental literacy and stewardship. For example:

- *The National Environmental Literacy Project: A Baseline Study of Middle Grade Students in the United States*² describes a baseline for the general level of environmental literacy among U.S. 6th and 8th grade students.
- *Quantifying a Relationship Between Place-based Learning and Environmental Quality*³ investigated the connection between school-based and nonformal education programs and local air quality improvements.

However, OEE stated it cannot demonstrate to what extent the investment in such initiatives has improved environmental literacy and stewardship.

OEE also stated that "EE Capacity"⁴—the current teacher training program that began in 2010—has provided 197 national training workshops, 452 online courses, 311 professional learning communities, 783 guidelines training, 751 state consortia, and 26 fellows. Since 1992, the OEE has awarded more than 3,600

² William McBeth & Trudi L. Volk (2009). [The National Environmental Literacy Project: A Baseline Study of Middle Grade Students in the United States](#). *The Journal of Environmental Education*, 41:1, 55-67, accessed July 6, 2015.

³ Brian Johnson, Michael Duffin, Michael Murphy (2012). [Quantifying a Relationship Between Place-based Learning and Environmental Quality](#). *Environmental Education Research*. Vol. 18, Issue 5, 2012, accessed July 6, 2015.

⁴ In December 2010, the EPA awarded a 5-year cooperative agreement to Cornell University for the [Expanding Capacity in Environmental Education Project \(EE Capacity\)](#). EE Capacity supports environmental education and youth and community development in the United States, Canada and Mexico.

grants, providing over \$50 million in federal funding for projects across the country.⁵ The EE Capacity and other outputs (specific activities or efforts) described above are promising. However, no comprehensive program-level analysis has been done; therefore, the ultimate impact of funds on OEE's program performance and goals cannot be determined.

OEE Did Not Assess Program Results

OEE did not assess its program performance as defined in EPA, OMB and GAO guidance. Further, OEE did not follow its strategic plan that called for program performance assessments. The lack of performance assessments impedes the EPA's ability to demonstrate the benefit of public investment in an environmental education program.

Strategic Program Measures Not Implemented and Have Become Outdated

OEE developed a strategic plan in 2006 as its framework and tool for program performance management and measurement. In developing the strategic plan, OEE stated that it was intended to help meet EPA obligations under GPRAMA and to create a framework to gauge and measure progress toward OEE's environmental results. The 2006 strategic plan contained 35 program performance measures and had several objectives to improve the ability of educators to teach environmental concepts, including:

- Supporting environmental education workshops, on-line courses and the correlation of state standards of learning.
- Supporting efforts to integrate environmental education into higher (college) learning by targeting teacher preparation programs and faculty.
- Supporting state environmental education certification programs that integrate environmental education with state education programs.

“The Office of Environmental Education (OEE) developed this strategic plan to guide its current activities and future programs and to better align the activities of the office with the U.S. Environmental Protection Agency’s (EPA’s) strategic plan. The strategic plan also provides a framework that can be used to measure OEE’s progress toward achieving the stated goals and objectives.”

OEE’s 2006–2011 Strategic Plan

However, OEE did not implement its strategic plan program performance measures. Further, OEE has not updated the foundation for its performance accountability process since September 2006 and, according to that strategic plan, new performance measures should be developed.

⁵ Further details are on the EPA's [Environmental Education \(EE\) Grants](#) webpage.

Agency Policy on Measuring Grant Performance Not Followed

Grants are the majority (63 percent) of the environmental education program budget. EPA Policy 5700.7A1 requires grant performance assessment and reporting as part of the agency's Annual Performance Report process and for internal evaluation. Grant performance assessment must address grant contribution to program goals and objectives, achieving environmental results and/or public health protection, and other significant results.

EPA Order 5700.7A1, paragraph 13.a., states: "Program offices and National Program Managers must ensure that: (1) competitive funding announcements, work plans, funding recommendations, and performance reports contribute to the Agency's programmatic goals and objectives and demonstrate achievement of environmental results and/or public health protection in compliance with the requirements of this Order; and (2) the results of assistance agreements are reviewed and reported in accordance with the requirements of this Order."

According to its 2006 strategic plan, OEE was to determine, through its grantees, the percentage of all students and teachers targeted who demonstrate improved academic achievement or teacher aptitude. Further, the grantees were to provide information on the percentage of all grantee participants who demonstrate increased environmental knowledge. However, OEE asserted the following:

Paperwork Reduction Act Limitations. OEE cited the Paperwork Reduction Act as an impediment to obtaining performance information needed to assess its programs. While that act restricts the amount of information an agency can request from the public, OEE's assertion that the Paperwork Reduction Act is an impediment is not correct. The Office of Environmental Information stated that the EPA has a duty to collect grant performance information. The Office of Environmental Information further stated that the EPA has OMB permission to collect the data on grants it needs without violating the Paperwork Reduction Act. According to the Office of Environmental Information, "performance information tailored to individual grants escapes the PRA [Paperwork Reduction Act] purview." The Office of Environmental Information cited the National Estuary Program as an example of where the EPA Office of Water obtained OMB approval to collect the same information from 28 cooperative agreements in a program.

OEE Is Not Required to Report Results Under GPRAMA. OEE stated that the Office of the Administrator does not require it to report program accomplishments for the Agency Annual Performance Report. However, performance reporting is required by the GPRAMA so the agency can assess its priority goals. Further, EPA Order 5700.7A1 directs that program offices should provide performance information to the agency for that assessment.

OEE did not obtain and assess program performance data and report results as required by the National Environmental Education Act of 1990 and other guidance. OEE stated that the results from these programs as a whole have not been synthesized for overall grant program results. OEE cited significant financial

and analytical challenges, as well as resource limitations, as impeding comprehensive program analysis.

Other Program Control Matters

Federal Advisory Council. After 2005, the EPA did not fund and convene the NEEAC to engage in the business of the council as required by the act until 2012.⁶ OEE stated that implementation of the act's provisions is budget-determined and strictly required. NEEAC members are paid from the same portion of the budget that is allocated for expenses, such as OEE and regional environmental education personnel payroll, operating costs, and travel. According to OEE, it has not always had sufficient funding for NEEAC activity, but when the budget has provided sufficient funding, the NEEAC has been active. OEE cited the activation of NEEAC at the end of 2012 as an example. As a result of not convening the NEEAC, the required biennial reports to Congress on the results of the EPA's environmental education program had not been submitted from March 2005 until October 2015.

Addressing NEEAC Recommendations. In 2005, NEEAC made recommendations for improvement as required by the National Environmental Education Act of 1990. Specifically, regarding the council's 2005 recommendations, OEE:

- Developed the framework and tools to measure the environmental education program, but did not execute or update those tools to assess comprehensive program results.
- Implemented research initiatives to improve environmental literacy and stewardship, but did not assess the effectiveness of these initiatives toward achieving OEE program performance goals.
- Funded programs to improve educators' ability to teach environmental concepts, but did not assess the effectiveness of the programs toward achieving OEE performance goals.

Although the Federal Advisory Committee Act does not require council recommendations to be acted upon, GAO internal control standards require that the findings of audits and other reviews be promptly resolved. As such, the EPA should promptly review and resolve NEEAC recommendations and communicate that to the council.

⁶ The act at §9(b)(1) states the Advisory Council shall be the exclusive entity to advise, consult with and make recommendations to the Administrator on matters relating to activities, functions and policies of the agency under this act. The act at §9(d)(1) states that the Advisory Council shall report to Congress biennially, and that reports must receive public review and comment before being sent to Congress. Specifically, reports are required to describe and assess the extent and quality of environmental education in the nation, and summarize and make recommendations for addressing major obstacles to improving environmental education. The act at §9(b)(4) states that Advisory Council members are appointed for 3-year terms.

Conclusions

The EPA cannot assess its environmental education program results and benefits, and is limited to reporting on individual grant and cooperative agreement outputs. OEE did not execute its strategic plan or NEEAC recommendations that would have enabled an evaluation of program results and performance. As a result, OEE is significantly impaired in its ability to provide evidence of results and instill confidence that it has the capacity to properly manage the environmental education program and the program's significant grant funds. Improved program management and oversight controls are needed for program accountability and budget justification, and to reduce and manage the current risk of waste and abuse.

Recommendations

We recommend that the Associate Administrator for Public Engagement and Environmental Education:

1. Develop internal controls to ensure that:
 - a. The Office of Environmental Education obtains performance data linked to program objectives and goals.
 - b. The Office of Environmental Education analyzes that performance data as part of routine program performance evaluation.
 - c. The Office of Environmental Education annually, at minimum, reports program performance progress on strategic plan goals and measures to the Administrator.
 - d. The National Environmental Education Advisory Council is continuously and fully staffed as required by the National Environmental Education Act of 1990.
 - e. The Office of Environmental Education ensures that the National Environmental Education Advisory Council recommendations are promptly resolved and executes agreed-upon actions in a timely manner.
 - f. The National Environmental Education Advisory Council prepares and submits its biennial report to Congress as required by the National Environmental Education Act of 1990.
2. Implement procedures to periodically review and update the Office of Environmental Education strategic plan to ensure that performance objectives are relevant and actionable, and deadlines are met.
3. Implement language in grant agreements that requires the recipient to report performance measures linked to the Office of Environmental Education's strategic program performance measures.

Agency Response and OIG Evaluation

In response to the draft report, the OEE disagreed with most of the findings while offering support for most of the recommendations. In April 2016, OIG and OEE representatives met to discuss the recommendations and agency response. As a result of discussions, Recommendations 1c and 1f are resolved and closed; Recommendations 1a, 1b, 2 and 3 are resolved but remain open until corrective action milestones are met; and Recommendations 1d and 1e are unresolved and resolution efforts must be initiated (Recommendation 1e was modified and combines the former Recommendations 1e and 1f).

The agency provided extensive comments to the draft report. Due to the size of the document, we have provided the [agency's comments and our evaluation](#) in a stand-alone document on our website.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS

| Rec. No. | Page No. | Subject | Status ¹ | Action Official | Planned Completion Date | Potential Monetary Benefits (in \$000s) |
|----------|----------|--|---------------------|---|-------------------------|---|
| 1 | 11 | Develop internal controls to ensure that: | | Associate Administrator for Public Engagement and Environmental Education | | |
| | | a. The Office of Environmental Education obtains performance data linked to program objectives and goals. | O | | 5/31/17 | |
| | | b. The Office of Environmental Education analyzes that performance data as part of routine program performance evaluation. | O | | 5/31/17 | |
| | | c. The Office of Environmental Education annually, at a minimum, reports program performance progress on strategic plan goals and measures to the Administrator. | C | | 3/31/16 | |
| | | d. The National Environmental Education Advisory Council is continuously and fully staffed as required by the National Environmental Education Act of 1990. | U | | | |
| | | e. The Office of Environmental Education ensures that the National Environmental Education Advisory Council recommendations are promptly resolved and executes agreed-upon actions in a timely manner. | U | | | |
| | | f. The National Environmental Education Advisory Council prepares and submits its biennial report to Congress as required by the National Environmental Education Act of 1990. | C | | 1/31/16 | |
| 2 | 11 | Implement procedures to periodically review and update the Office of Environmental Education strategic plan to ensure that performance objectives are relevant and actionable, and deadlines are met. | O | Associate Administrator for Public Engagement and Environmental Education | 5/31/17 | |
| 3 | 11 | Implement language in grant agreements that requires the recipient to report performance measures linked to the Office of Environmental Education's strategic program performance measures. | O | Associate Administrator for Public Engagement and Environmental Education | 5/31/17 | |

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.

Distribution

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