



United States
General Accounting Office
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**Resources, Community, and
Economic Development Division**

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The Honorable Richard K. Arney
Majority Leader
House of Representatives

The Honorable John Kasich
Chairman
Committee on the Budget
House of Representatives

The Honorable Dan Burton
Chairman
Committee on Government Reform
and Oversight
House of Representatives

The Honorable Bob Livingston
Chairman
Committee on Appropriations
House of Representatives

Subject: Results Act: Observations on EPA's Draft Strategic Plan

On June 12, 1997, you asked us to review the draft strategic plans submitted by the cabinet departments and selected major agencies for consultation with the Congress as required by the Government Performance and Results Act of 1993 (the Results Act). This letter is our response to that request concerning the Environmental Protection Agency (EPA).

**Objectives, Scope,
and Methodology**

Specifically, you asked us to review EPA's draft plan and (1) assess whether it fulfills the requirements of the Results Act and to provide our views on its overall quality; (2) assess whether it reflects EPA's key statutory authorities; (3) assess whether it reflects interagency coordination for crosscutting programs, activities, or functions that are similar or complementary to other federal agencies; (4) assess whether it addresses management problems we have previously identified; and (5) assess whether EPA's data and information systems are adequate for providing reliable information for measuring results.

We reviewed the draft strategic plan that EPA provided congressional committees with on July 1, 1997. Our overall assessment of the draft plan was generally based on our knowledge of EPA's operations and programs, our prior reviews of the agency, and other existing information available at the time of our assessment. The criteria that we used to determine whether the draft strategic plan complied with the requirements of the Results Act were the provisions of the Results Act itself, supplemented by the Office of Management and Budget's (OMB) guidance on developing the plans (OMB Circular A-11, Part 2).

To make judgments about the overall quality of the draft plan, we used our May 1997 guidance for congressional review of the plans (GAO/GGD-10.1.16) as a tool. To determine whether the draft plan contained information on interagency coordination and addressed the management problems that we previously identified, we relied on our general knowledge of EPA's operations and programs and the results of our prior reports. In determining whether the draft strategic plan reflected EPA's major statutory responsibilities, we reviewed applicable legislation, including laws cited in EPA's draft plan and, as you requested, coordinated our review with the Congressional Research Service. To determine whether EPA had adequate systems in place to provide reliable information on performance, we relied on the results of our previous reports and those of EPA's Office of the Inspector General. We also discussed the draft plan with officials of EPA's Office of Planning, Analysis, and Accountability, which is responsible for preparing the plan. Our work was performed during July 1997. We obtained comments from EPA on a draft of this report, which are summarized at the end of this letter.

It is important to recognize that EPA's final plan is not due to the Congress and OMB until September 1997. Furthermore, the Results Act anticipated that it may take several planning cycles to perfect the process and that the final plan would be continually refined as future planning cycles occur. Thus, our findings reflect a snapshot status of the draft strategic plan at this time. We recognize that developing a strategic plan is a dynamic process and that EPA is continuing to revise the draft with input from OMB, congressional staff, and other stakeholders.

Background

EPA was formed in 1970 by executive reorganization from various components of other agencies to better marshal and coordinate federal pollution control efforts. The agency does not have a single, unified statute

to enumerate an overarching mission and purpose. Instead, EPA is responsible for implementing about a dozen major statutes.

Although its activities have expanded to include various international and nonregulatory approaches to controlling pollution, EPA is, above all, a regulatory agency, responsible for setting and enforcing the environmental standards called for in the various statutes. It also conducts environmental research; assists state and local governments, private groups, individuals, and educational institutions combatting environmental pollution; and assists in developing and recommending to the President new policies for environmental protection. EPA has a significantly greater effect on the national economy than its annual budget of about \$7 billion would suggest. For example, the nation spent over \$120 billion in 1994—the year of the latest available data—on controlling and regulating pollution.¹

EPA relies heavily on the states to implement its programs. Major environmental laws—such as the Safe Drinking Water Act and the Clean Water Act—assign to EPA the key functions involved in the delivery of environmental programs but allow states to assume these responsibilities. Today, operational responsibilities for most of EPA's major programs lie with the states and, for the most part, EPA now depends on the states to implement the full range of environmental responsibilities associated with these programs. Even when responsibilities have not been formally delegated, states often play a major role in day-to-day program activities.

EPA has previously prepared strategic plans, the most recent of which was issued in July 1994, about a year after the Results Act became law. The current draft plan builds on the 1994 plan but is the first being developed in response to the Results Act. The current draft plan is also the first strategic plan being developed under EPA's new planning, budgeting, and accountability organization. In response to April 1995 recommendations by the National Academy of Public Administration (NAPA), EPA is in the process of improving and integrating its planning, budgeting, and accountability processes. In January 1997, the EPA Administrator approved the staffing and organizational structure for a new office—the Office of Planning, Analysis, and Accountability within the Office of the Chief Financial Officer—to design and implement a new system. The current draft strategic plan is being prepared by the Office of Planning, Analysis, and Accountability as the first component of the new planning, budgeting, and accountability system.

¹Survey of Current Business (Vol. 70, No. 9, Sept. 1996), Bureau of Economic Analysis, Department of Commerce.

The Results Act requires that agencies' strategic plans contain the following six critical components: (1) a comprehensive mission statement; (2) agencywide long-term goals and objectives for all major functions and operations; (3) approaches (or strategies) and the various resources needed to achieve the goals and objectives; (4) the relationship between the long-term goals and objectives and the annual performance goals; (5) an identification of key factors, external to the agency and beyond its control, that could significantly affect the achievement of the strategic goals; and (6) a description of program evaluations used to establish or revise strategic goals and a schedule for future program evaluations.

Results in Brief

EPA's draft strategic plan does not yet contain all the elements required by the Results Act. While EPA has made progress toward developing a strategic plan for carrying out the agency's missions and meeting the requirements of the Results Act, it still has some work to do before it completes its final plan by September 30, 1997. The draft plan provides a mission statement, general goals and objectives, approaches and strategies, and an identification of key external factors. It communicates the agency's planned activities, and its goals and objectives are generally results oriented and measurable. However, the draft plan does not include two of the elements required by the Results Act: (1) the relationship between the goals and objectives and the annual performance goals and (2) program evaluations used to develop the plan and a schedule for future evaluations.

On the basis of our review of relevant legislation, we believe that the activities defined in EPA's draft plan are supported by legislation and that the draft plan reflects EPA's major legislative requirements. We also believe that the linkages that EPA provides between goals, objectives and strategies, and "potential" statutory authorities help the reader to understand the plan. However, it would be more helpful if EPA identified which of the laws actually support each goal.

EPA's draft plan does not discuss interagency coordination for crosscutting programs, activities, or functions that are similar to those of other federal agencies. It is important that the plan do so because EPA and other agencies carry out a number of mission-related activities that are crosscutting or similar. For example, to meet the purposes of its plan, EPA must work closely with agencies responsible for cleaning up hazardous waste sites at federal facilities, address global warming and other international environmental concerns, and ensure a food supply that is

safe from harmful chemicals. EPA is currently taking steps to coordinate its plan with other agencies, such as the Department of Energy and the National Aeronautics and Space Administration, to address crosscutting programs and activities. As EPA identifies such programs and activities, its strategic plan would be improved through a discussion of the steps that the agency will take to ensure proper coordination.

EPA's draft strategic plan recognizes major management challenges that we have previously identified and discusses the agency's plans to act on them. The draft plan, however, provides limited details on how these long-standing problems will be resolved. These challenges include setting priorities, making effective use of nonregulatory approaches to supplement traditional "command and control" regulations, improving working relationships with the states, and ensuring the quality and completeness of the scientific research on which the agency bases its decisions.

EPA is currently developing an agencywide information system to track performance and report on results. However, this system will depend on data from various other systems and sources that currently do not provide the reliable information that EPA needs for measuring results. Many gaps exist in these data, and the needed data are often difficult to compile because different collection methods have been used to obtain them. Likewise, effort is still needed to identify, develop, and reach agreement on a comprehensive set of performance measures for the agency. Particularly needed are additional environmental measures or indicators to link EPA's activities to changes in health and environmental conditions. Because the type and amount of data needed for environmental measures can be costly, EPA has to find the right balance of environmental and activity measures. In a June 1997 report, we recommended that EPA, in consultation with key stakeholders, establish benchmarks for the information system and use them to monitor the agency's progress toward obtaining the data it needs to accurately assess its progress in managing environmental protection programs.² EPA also needs to improve its financial data by correcting internal control weaknesses that have been identified by the agency's Office of the Inspector General. EPA's final plan should address such weaknesses and set clear expectations for correcting them and achieving an unqualified opinion on the agency's financial statements.

²Managing for Results: EPA's Efforts to Implement Needed Management Systems and Processes (GAO/RCED-97-156, June 18, 1997).

EPA's Draft Strategic Plan Does Not Yet Contain All the Elements Required by the Results Act

EPA's draft strategic plan does not contain all six of the Results Act's key requirements, and certain aspects of those included could be improved. Nevertheless, the draft plan shows progress overall toward meeting the purposes of the act.

EPA's Draft Strategic Plan Lacks Key Elements Required by the Results Act

EPA's draft plan contains four of the six elements required by the Results Act: (1) a mission statement, (2) general goals and objectives, (3) approaches or strategies to achieve the goals and objectives, and (4) an identification of key external factors. However, the draft plan does not describe either the (1) relationship between the general goals and objectives and the annual performance goals or (2) program evaluations used in developing the plan and a schedule for future evaluations. Although the draft plan contains a section on program evaluation, the discussion focuses on the role of evaluation in assessing future results and provides general criteria for deciding which evaluations to perform in the future. For the four elements that were included, we noted that the draft plan did not contain all the details suggested by OMB Circular A-11 and/or other improvements could be made to improve the plan's usefulness.

Observations on the Overall Quality of EPA's Draft Plan

EPA has made progress in producing a draft strategic plan in accordance with the purposes of the Results Act. Two elements are missing and those that are included could be made more useful. However, the draft plan, in total, provides a good indication of EPA's planned direction and major efforts to achieve its mission. The goals and objectives of the draft plan are, to a great extent, outcome-oriented, and its objectives are largely measurable. The objectives—along with the sections on planned accomplishments, strategies, and results expected—provide a basis for holding EPA accountable for achieving results. The draft plan also provides several additional sections that are not required by the Results Act or suggested in OMB Circular A-11 but which are helpful to understanding EPA's operations and activities. For example, the plan includes a chapter that discusses how EPA generally considers benefit and cost information in its work and the significant costs and benefits associated with the goals and objectives presented in the plan. According to EPA officials, this chapter was specifically included in EPA's draft plan at the request of the Congress.

While the plan's goals and objectives are generally well defined, the large number of goals and objectives may make it difficult for the Congress,

other stakeholders, and possibly agency managers to discern EPA's priorities—that is, what will be most important to the agency over the next several years. The draft plan has 10 goals and 45 associated objectives. In addition, the plan contains 14 strategic principles that are similar to goals. These principles include emphasizing children's health; choosing common sense, cost-effective solutions to environmental problems; and strengthening partnerships with states and others.

Although the draft plan points out the important role of other federal agencies and states in carrying out EPA's programs, the plan could more clearly describe (1) the contribution that these entities are expected to make in meeting the agency's goals and objectives and (2) the effect of their performance on the plan's success. Our specific observations on the six elements required by the Results Act are discussed in the following sections.

Mission Statement

According to OMB Circular A-11, the mission statement should briefly define the basic purpose of the agency, with particular focus on its core programs and activities. In its draft plan, EPA provides an overarching statement that its mission is "to protect public health and to safeguard the natural environment—air, water, and land—upon which life depends." EPA also identifies several purposes of the agency, including ensuring that all Americans are protected from significant risks to public health and the environment where they live, learn, and work; basing national environmental efforts on the best available scientific information; and ensuring that federal laws protecting public health and the environment are enforced fairly and effectively.

The draft plan's overarching mission statement is general but concisely states what EPA is broadly charged with doing under its statutes. This statement, along with the purpose statements, are comprehensive in that they cover the agency's major statutes, programs, and activities. The mission statement is also results oriented and clearly specifies the public need that the mission is to fulfill.

Although having a concise and straightforward mission statement is important, EPA can better distinguish its responsibilities from those of other agencies and recognize the important role of the states in carrying out federal environmental programs. Other agencies also have major responsibilities for parts of EPA's mission, for example, the Department of Health and Human Services protects human health, the Department of

Labor's Occupational Health and Safety Administration regulates health risks in the workplace, and the Departments of Agriculture and the Interior protect the environment. State and local governments also have health and environmental programs.

Goals and Objectives

OMB Circular A-11 states that strategic plans should set out an agency's long-term programmatic, policy, and management goals, outlining planned accomplishments and the schedule for their implementation. According to Circular A-11, the general goals and objectives should elaborate on how the agency is to carry out its mission and very often will be expressed as outcomes. Circular A-11 also states that general goals and objectives should be stated in a manner that allows a future assessment of whether they are being achieved.

EPA has listed 10 goals for the agency, most of which have multiple objectives. EPA officials told us that the strategic plan's goals and objectives are largely derived from those developed by EPA's National Environmental Goals Project.³

The plan is generally developed along the same lines as EPA's statutory requirements and organizational structure. For example, individual goals address clean air, clean water, waste management and cleanup, international responsibilities, and internal management functions. (See encl. I for a listing of EPA's draft goals.)

The goals are generally results-oriented and measurable. For example, EPA's goal for clean air states, in part, that the "air in every American community will be safe and healthy to breathe, as determined by the latest, best scientific evidence." However, EPA's goals for "effective management" and "sound science, improved understanding of environmental risk, and greater innovation to address environmental problems" do not clearly define the expected results, and it is unclear how EPA would assess progress toward achieving these goals.

Although the objectives are generally results oriented and measurable, in some cases, obtaining the data needed to measure progress toward the objectives will present a challenge for EPA. For example, one of EPA's clean and safe water objectives states that watersheds will be restored and protected so that 80 percent of the nation's surface waters will support

³EPA began the National Environmental Goals Project in 1992 to establish, with input from the public and other government agencies, a set of long-range national environmental goals with realistic and measurable milestones for 2005. EPA officials anticipate that the final report will be issued in 1998.

healthy aquatic communities by 2005. However, according to EPA's most recent National Water Quality Inventory Report, the states have assessed only 42 percent of their lake, pond, and reservoir acres; 17 percent of their river and stream miles; and 9 percent of the nation's ocean shoreline. In addition, EPA reported inconsistencies in the assessments and in the assessment methodologies themselves.

In some instances, objectives are dependent upon actions to be taken by other federal agencies or other entities that are not under EPA's control. For example, in order to fully achieve EPA's goal for "better waste management and restoration of abandoned waste sites," EPA must depend on federal agencies such as the Departments of Energy and Defense, which have cleanup responsibility for federal facilities under their jurisdiction. Likewise, as of December 1996, EPA authorized 32 states to implement the cleanup requirements of the Resource Conservation and Recovery Act of 1976, as amended, and EPA's data suggests that about 70 percent of the cost of cleaning up Superfund sites is the responsibility of the private sector. Although EPA must rely on other federal agencies, states, and the private sector to clean up previously polluted sites, the draft plan does not explain how EPA is going to coordinate this effort.

Approaches to Achieving Strategic Goals and Objectives

Under the Results Act, the strategic plan must describe the operational processes, staff skills, and technologies, as well as the human, capital, information, and other resources, needed to meet the goals and objectives of the plan. Additionally, according to OMB Circular A-11, strategies should outline how the agency will communicate strategic goals throughout the organization and hold managers and staff accountable for achieving these goals.

In its draft plan, EPA provides a chapter on approaches organized by its strategic or general goals. For each goal, the plan generally has sections on the importance of the goal, objectives, what will be accomplished, strategies for how it will be accomplished, results expected, and performance measures. Together, these sections provide considerable detail on EPA's planned actions for achieving each of the goals. The sections, along with the plan's chapter on assessing results, which describes the agency's accountability process, communicate how managers and staff will be held accountable for achieving the draft plan's goals.

Neither the chapter on approaches nor other parts of the plan describe the staffing skills and resources needed to achieve the goals, as required by the Results Act. Instead, the approaches chapter recognizes that achieving the goals will take substantial human, capital, and technological resources. This chapter also states that the agency has developed a set of shorter-term objectives that (1) define how the agency will spend its resources and (2) provide a guide for assessing whether the goals are being reached. However, these shorter-term objectives—subobjectives—are generally not included in the plan. According to EPA officials, the annual performance plans required by the Results Act will provide more details on staffing and resource needs.

The chapter on approaches could also be improved by better linking the strategies to the specific objectives under each goal. While the strategies presented fit under the broad goals, the objectives state more specifically what results EPA is trying to achieve during the time frame covered by the strategic plan, and it is not always clear how a particular strategy relates to one or more of these objectives. For example, EPA’s safe food goal is that the “foods Americans eat will be free from unsafe pesticide residue.” Within this goal, EPA has the following two objectives:

- By 2005, the risk from the agricultural use of pesticides will be reduced by 50 percent from 1995 levels.
- By 2005, the use on food of current pesticides that do not meet the new statutory standard of “reasonable certainty of no harm” will be substantially eliminated.

Under the strategies section, the draft plan primarily discusses the agency’s current pesticide program without indicating what will be done differently to, for example, achieve the 50-percent reduction in risk from the agricultural use of pesticides.

Relationship Between Long-Term Goals and Objectives and Annual Performance Goals

Under the Results Act, the strategic plan must describe how the agency’s annual performance goals are related to the general goals and objectives in the strategic plan. A performance goal is the target level of performance expressed as a tangible, measurable objective against which actual achievement is to be compared. According to OMB Circular A-11, the strategic plan should outline the (1) type, nature, and scope of the performance goals to be included in an annual performance plan; (2) the relationship between the performance goals and the general goals and

objectives; and (3) the relevance and use of performance goals in helping determine the achievement of general goals and objectives.

EPA's draft plan discusses, in a general way, the relevance and use of performance goals to help determine the achievement of general goals and objectives. However, it does not identify the annual performance goals and discuss their relationship to particular general goals and associated objectives.

Office of Planning, Analysis, and Accountability officials agreed that the draft strategic plan does not describe the relationship between long-term goals and objectives and annual performance goals, as called for by the Results Act and OMB Circular A-11. They said, however, that they believe that the relationship will be clear once the annual performance plan is available. According to the officials, annual performance goals are being developed for each of the strategic goals and objectives, making the linkage clear. The officials further said that EPA's new planning, budgeting, and accountability system calls for the preparation of multiyear plans as a bridge between the plans. Because of time constraints, the strategic and annual performance plans are being developed concurrently this planning cycle, and the multiyear plan will probably be prepared next year, according to the officials. The officials stated that language discussing the relationship of the annual performance goals to the strategic goals and objectives will be added to the September 1997 version of the strategic plan.

Key External Factors

OMB Circular A-11 points out that agencies' achievement of their goals and objectives can be influenced by certain external factors that exist, occur, or change over the time period covered by their plans. Circular A-11 notes that these factors can be economic, demographic, social, or environmental and states that the strategic plan should briefly describe each external factor, indicate its link with a particular goal(s), and describe how the achievement of the goal could be affected by the factor.

EPA's draft plan identifies as a key external factor the agency's heavy reliance on partnerships to protect the environment and human health. The draft plan notes that, although the agency has some influence, it does not control the actions of the state, local, and tribal governments that implement federal environmental programs; other federal agencies with significant environmental responsibilities; or other countries and international organizations with which the United States shares

environmental goals. The draft plan also notes that much of the success of the agency's programs depends on the voluntary cooperation of the private sector and the general public. In addition, the draft plan identifies significant external factors, such as (1) the development of new environmental technology that works better and costs less and (2) natural processes that affect the condition of ecosystems.

Some further discussion of the importance of the states, tribes, industry, and the public to EPA's success is provided in the draft plan's introductory chapter and, for the states, also in the chapter on assessing results. However, the plan does not link the external factors to particular goals or describe how the achievement of the goals could be affected by the factors. In our view, the draft plan would also benefit from further discussion, in the section on key external factors, to identify the (1) significant environmental responsibilities of other federal agencies that affect EPA's success, (2) types of technological developments that have previously affected the agency's programs or are currently under development, and (3) natural processes that affect the environmental condition of ecosystems. For example, success in cleaning up waste sites largely depends upon the actions of other federal agencies, such as the Departments of Defense and Energy; meeting new air quality standards depends upon the introduction of new technologies; and saving watersheds depends upon the actions of federal, state, and local organizations to protect natural environmental systems.

Program Evaluation

Under the Results Act, the strategic plan is to describe program evaluations that were used in preparing the plan and include a schedule for future evaluations. OMB Circular A-11 calls for this schedule to outline the general scope and methodology for the evaluations, the key issues to be addressed, and the time when such evaluations are to occur. In EPA's draft plan, however, this section—contained in the chapter on assessing results—generally describes how program evaluations will be used in the future and the general criteria for selecting programs to evaluate. The section does not describe program evaluations done by the agency or others, such as its Inspector General or us, which were to be used to establish strategic goals or a schedule for future evaluations.

Office of Planning, Analysis, and Accountability officials told us that, although not described in the plan, program evaluations and other studies, including those done by EPA's Office of the Inspector General and us, were used in developing the draft plan. According to the officials, the agency's

program offices were aware of the evaluations and studies when developing their goals, objectives, and strategies and took the findings into consideration. As discussed earlier, the officials also said that the draft plan's strategic goals and objectives are largely derived from those developed by EPA's National Environmental Goals Project, and these evaluations would have been identified and taken into account during the almost 5 years since the project began. The officials further noted that program evaluations will be an important part of the accountability component of EPA's new planning, budgeting, and accountability system, but the component is under development. According to the officials, a section on how program evaluations contributed to establishing the agency's goals is being drafted and will be included in the September 1997 version of the strategic plan.

Legislative Authorities Are Reflected in Plan

On the basis of our review of relevant legislation, we believe that (1) the activities defined in EPA's plan are supported by legislation and (2) the plan reflects EPA's major legislative requirements. In addition, although not required by the Results Act, EPA has provided a list of statutory authorities for each goal and related objectives and strategies that potentially could be used in carrying out the planned actions. We believe that including these linkages in EPA's plan should facilitate a better understanding of the diversity and complexity of the agency's overall mission and goals and objectives. We note, however, that EPA's draft plan lists these laws as "potential" authorities. To be fully useful, EPA will need to identify, in the final plan, which of these laws actually support each goal.

In commenting on a draft of this report, Office of Planning, Analysis, and Accountability officials told us that they intend to revise the draft plan to include actual, rather than potential, statutory authorities. They also said that these authorities would be tied to the individual objectives, rather than to the broader goals.

Crosscutting Program Activities Are Not Addressed, but Coordination Efforts Are Under Way

EPA's draft plan makes broad references to the need for coordination with federal agencies (and other stakeholders) to accomplish the agency's mission, but it does not explicitly address the relationship of EPA's activities to federal agencies with crosscutting or similar activities. Neither does it provide evidence that EPA has coordinated the plan's development with them. However, the plan does identify "strengthening partnerships with stakeholders"—including other federal agencies—as a strategic principle that will be used to guide senior management in making

decisions about the agency's priorities, activities, and ways in which the plan's goals and objectives may best be reached. The plan also recognizes that voluntary partnerships with stakeholders are a key external factor—to a large extent beyond EPA's control—that could significantly affect the agency's ability to achieve its mission. While EPA has some influence over the actions taken by other federal agencies with significant environmental responsibilities (as well as some influence over state, tribal, and local governments), it does not control their actions. Hence, the agency acknowledges that effective partnerships with federal agencies and other stakeholders are essential to successfully implementing the plan's goals and objectives.

To address this coordination issue, EPA officials responsible for the plan's development told us that the agency has taken a number of steps to include stakeholders in developing and refining the plan.⁴ For example, a wide range of stakeholders' views—including those of other federal agencies—were incorporated into EPA's Environmental Goals for America,⁵ which served as the framework for developing the agency's strategic plan. In addition, while EPA did not formally involve all federal agencies with similar activities in preparing its plan, the agency's program offices informally solicited input from some federal agencies in developing their respective goals and objectives for inclusion in the plan. In addition, according to one of these officials, EPA's Office of Research and Development prepared its own strategic plan last year through the involvement of a number of stakeholders. This plan incorporated recommendations made by the agency's Science Advisory Board, the National Research Council, and NAPA, among others, and was used as the basis for developing science-related goals and objectives for the EPA-wide strategic plan.

To further refine the plan and determine areas of potential overlap between EPA and federal agencies with related responsibilities, EPA identified 16 federal agencies with crosscutting or similar functions and sent each of them a draft outline of the strategic plan in May 1997 and the

⁴The stakeholders include states, regions, environmental and other public interest groups, business associations, individual corporations, and local governments, among others. However, EPA's efforts to coordinate with other federal agencies were limited primarily by the time frames they were working under to complete the plan.

⁵Environmental Goals for America: With Milestones for 2005, EPA (Dec. 1996).

full draft in early July 1997 for their review and comment.⁶ In addition, EPA is reviewing these agencies' draft plans to identify areas of potential duplication that warrant further coordination. One official involved in the development of EPA's plan told us that because strategic plans are written at such a broad level, it can be difficult to use them as a tool for identifying areas of duplication—this level of detail is often found at the project level. As a result, EPA may need a couple of years to fully coordinate its activities with those of other federal agencies. According to EPA officials responsible for developing the strategic plan, the September 1997 version will address comments made by federal agencies and other stakeholders on the July draft circulated for review and discuss EPA's past and ongoing efforts to coordinate the plan with these stakeholders.

Our past work has found that EPA—as the central federal agency responsible for safeguarding the environment—carries out a number of mission-related activities that are crosscutting or similar to those of other federal agencies. These activities include the following:

- One of EPA's most visible relationships with other federal agencies involves the cleanup of hazardous waste (Superfund) sites at federal facilities.⁷ The process for cleaning up these sites consists of many steps involving both the responsible federal agencies and EPA. Our 1996 review of risk evaluations for federal facilities⁸ found that as of February 1996, EPA had designated 154 facilities as high priorities for cleanup,⁹ including facilities operated by the Departments of Agriculture (2), Defense (127), Energy (20), the Interior (2), and Transportation (1). Our work also found that interagency comparisons of risk posed by these sites are difficult because agencies have independently developed different risk-ranking and priority-setting approaches. While EPA's draft strategic plan includes a goal

⁶In late July 1997, a copy of EPA's draft strategic plan was also sent to the National Science Foundation for review and comment. EPA is reviewing the Foundation's draft plan, according to Office of Planning, Analysis, and Accountability officials. The officials said that the draft plan was not sent earlier because of an oversight, but EPA will have time to incorporate the comments before the plan is finalized.

⁷Numerous federal facilities have been contaminated with a wide range of substances, including highly radioactive waste and toxic chemicals, and require cleanup. The Superfund program, established under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, governs cleanups of hazardous waste sites, including those located on federal property.

⁸Federal Facilities: Consistent Relative Risk Evaluations Needed for Prioritizing Cleanups (GAO/RCED-96-150, June 7, 1996).

⁹As of April 1995, federal agencies had placed 2,070 facilities on the federal facility docket, EPA's listing of the facilities awaiting evaluation for possible cleanup. In addition, EPA had placed 154 federal facilities on the National Priorities List as of February 1996. EPA uses the list as an aid in determining which sites warrant further investigation to assess public health and environmental risks and which sites merit cleanup.

and related objectives that pertain to the cleanup of hazardous waste sites, it does not specifically address the issue of interagency coordination in achieving “better waste management and restoration of abandoned waste sites.”

- EPA shares responsibilities with other agencies for collecting and managing the data needed to perform environmental assessments. For example, data on ecosystem management are collected independently by various agencies for different purposes. Often, these data are noncompatible and insufficient for decision-making. Data for health assessments are equally widespread among federal entities. For example, EPA must coordinate such data with the Department of Labor, the National Institute for Occupational Safety and Health, the National Institute of Environmental Health Sciences, the National Science Foundation, and the National Cancer Institute, among other agencies. While the plan recognizes the need for stakeholders’ general involvement, it does not address the interagency coordination of data needed for health and environmental assessments. Neither does it assume or assign responsibility for collecting, managing, and making the data available to others.
- EPA, as the nation’s chief technical and regulatory agency for environmental matters, also plays a major role in international environmental programs and activities—including efforts to address global environmental concerns, such as climate change, stratospheric ozone depletion, marine and coastal pollution, and loss of biological diversity. Our recent work on international environmental agreements¹⁰ noted that EPA shares responsibility for implementing international environmental agreements with several federal agencies, including (1) the Department of State, (2) the U.S. Agency for International Development, (3) the Department of Energy, and (4) the Department of Commerce (primarily, the National Oceanic and Atmospheric Administration). However, EPA’s goal and related objectives on the reduction of global and cross-border environmental risks make only passing references to the need to cooperate with other federal agencies and other stakeholders in implementing this goal.
- EPA also shares responsibility with other federal agencies for ensuring a safe food supply for the American public and has therefore included food safety as one of the plan’s goals. In particular, the agency will strive to keep foods free of pesticides and protect the public from threats posed by tainted foods. While this goal makes a general reference to involving stakeholders in developing performance measures, there is no discussion of the related roles played by the U.S. Department of Agriculture, the Food

¹⁰International Environment: U.S. Funding of Environmental Programs and Activities (GAO/RCED-96-234, Sept. 30, 1996).

and Drug Administration, and the Centers for Disease Control, among others, in supporting EPA's efforts to accomplish this goal.

As noted above, EPA is taking steps to coordinate its plan with other federal agencies to address the issue of crosscutting or similar functions. However, because overlapping and fragmented programs can waste scarce resources, confuse and frustrate programs' customers, and limit the overall effectiveness of the federal effort, it is important that the plan directly address this issue. As EPA identifies areas where its functions are similar to and/or duplicate those of other federal agencies, its strategic plan would benefit from explicitly identifying these functions or activities and detailing the steps that EPA will take to ensure proper coordination with these agencies and the elimination of unnecessary duplication. Providing this type of information would help assure the Congress that crosscutting functions or activities shared by EPA and other federal agencies are sufficiently distinct and are making effective use of scarce federal resources.

EPA officials told us that language will be added to the plan to acknowledge the critical role that other federal agencies play in the successful achievement of EPA's mission and that, to the extent possible, the plan will identify specific federal agencies with a prominent role in attaining the objectives listed in the plan. According to the officials, the September 1997 version of the plan will also have an appendix summarizing, by goal, the crosscutting issues shared by EPA and other federal agencies. The officials said that this information will serve as the basis for coordinating the development of performance measures, resolving potential areas of conflict, and improving the management of current and future crosscutting initiatives.

EPA's Strategic Plan Addresses Major Management Challenges

In various reports and testimonies over the years, we have identified several major management challenges for EPA. These involve (1) setting priorities, (2) making effective use of nonregulatory approaches to supplement traditional command-and-control regulations, (3) working better with the states, (4) ensuring the quality and completeness of the scientific research on which the agency makes its decisions, and (5) better managing the Superfund program. NAPA also identified these challenges in its April 1995 report on EPA's performance in managing environmental protection.¹¹ EPA has been working to improve in these areas, and its draft

¹¹Setting Priorities, Getting Results: A New Direction for EPA, National Academy of Public Administration (Apr. 1995).

strategic plan recognizes these problems and discusses plans for additional efforts to address them. However, the draft plan would benefit by being more specific about actions that are planned.

The draft plan is also vague with respect to how EPA intends to implement information technology management reforms called for in the Paperwork Reduction Act of 1995 and the Clinger-Cohen Act of 1996, which direct agencies to integrate information technology investments with the agency's overall strategic planning process. In addition, EPA's draft plan does not address other important emerging information technology issues involving the need for computer systems to be changed to accommodate dates beyond 1999—the “year 2000 problem”—and information security.

Setting the Agency's Priorities

We have reported that EPA needs to make two principal improvements in the way it sets its priorities for planning and budgeting purposes.¹² First, priorities could better reflect risks to human health and the environment. For example, we noted in our 1991 report that EPA's Science Advisory Board, which advises the Administrator on scientific matters, found that funding priorities were more closely aligned with public opinion about health and environmental risks than with scientific assessment. In its 1995 report, NAPA concluded that to set better priorities, EPA will need to do a better job of comparing risks and risk reduction strategies across environmental programs or problem areas. Second, we have found that EPA's priority-setting process has often yielded too many priority items, that is, priorities that are too encompassing without being ranked as to their importance. Similarly in its 1995 report, NAPA said that EPA's 1994 strategic plan appears to include almost everything of interest in the agency.

As noted in its draft strategic plan, EPA is working to improve and integrate its planning, budgeting, and accountability processes. As we reported in June 1997, EPA's new processes are principally being put in place in response to NAPA's concerns.¹³ When fully implemented, the improvements

¹²Environmental Protection: Current Environmental Challenges Require New Approaches (GAO/T-RCED-95-190, May 17, 1995), Management Issues Facing the Environmental Protection Agency (GAO/T-RCED-93-26, Mar. 29, 1993), Environmental Protection: Meeting Public Expectations With Limited Resources (GAO/RCED-91-97, June 18, 1991), and Environmental Protection Agency: Protecting Human Health and the Environment Through Improved Management (GAO/RCED-88-101, Aug. 16, 1988).

¹³Managing for Results: EPA's Efforts to Implement Needed Management Systems and Processes (GAO/RCED-97-156, June 18, 1997).

should help the agency to better define its priorities, including making better use of available information on risk.

The draft strategic plan also addresses the need for better risk information. For example, in discussing the eighth goal of EPA's draft strategic plan—"Sound Science, Improved Understanding of Environmental Risks, and Greater Innovation to Address Environmental Problems"—the draft plan states, among other things, that science enables the agency to identify the most important sources of risk to public health and the environment, and by doing so, informs priority-setting, ensures credibility for policies, and guides the deployment of resources. According to the draft plan, the planned efforts under this goal will provide EPA with greater certainty in assessing and comparing environmental risks on the basis of access to critical information and tested methodologies through high quality-peer review.

Although not specifically mentioned in the draft plan, a project is being carried out by the Science Advisory Board to rank the relative risks of environmental problems and develop methodologies that EPA can use to rank risks in the future. A draft report on the results of this study, which is called the Integrated Risk Project, is to be provided to other scientists and experts for peer review in August 1997. According to EPA officials, strategic planning is an iterative process and the plan will be updated, as appropriate, to reflect the final results of this and other studies or factors.

Using Nonregulatory Approaches to Pollution Control

The traditional approach to pollution control—which requires polluters to adhere to certain performance or technology standards—has helped control pollution from large, stationary sources, such as factories and power plants.¹⁴ However, a number of environmental problems remain that the traditional approaches cannot resolve or that could be resolved more efficiently and effectively through other methods. These problems include pollution from some small, diffuse sources and pollution that crosses from one environmental medium—air, water, or land—to another. The selective use of market incentives to supplement traditional regulatory approaches, efforts to prevent pollution, and other nonregulatory approaches may be less costly to the economy, as well as more effective in controlling or preventing pollution.

¹⁴Environmental Protection: Meeting Public Expectations With Limited Resources (GAO/RCED-91-97, June 18, 1991).

The fourth goal of EPA's draft strategic plan focuses on preventing pollution. The draft plan states that because traditional regulatory programs can be costly, EPA is looking at alternative approaches that may be used to augment basic programs. Rather than traditional "end of the pipeline" controls, preventing pollution at the source will be EPA's strategy of first choice, according to the plan. Some of the goal's associated objectives involve the use of certain nonregulatory approaches, such as the introduction of safer chemicals into the marketplace, and one of the objectives is for EPA to improve pollution prevention strategies, tools, and approaches. In addition, the discussion of strategies under some of the other goals includes nonregulatory approaches. Finally, one of the plan's strategic principles is for managers to emphasize the prevention of pollution in setting priorities and making key decisions.

The draft plan mentions the use of emissions allowance trading, another potentially effective nontraditional approach, in the introductory chapter but does not relate additional efforts to a particular goal or objective. Under emissions-trading programs, pollution sources that reduce their emissions below the required levels can sell their extra allowances to other sources of pollution to help them meet their requirements. These programs can be a less costly means to reduce pollution than traditional regulatory approaches. For example, we recently reported that EPA's acid rain program, which includes the trading of emissions allowances, has been successful thus far in reducing sulfur dioxide emissions while reducing compliance costs.¹⁵ We noted, however, that EPA has had limited success in expanding the emissions trading of other pollutants covered under the Clean Air Act. Several important issues, such as developing and implementing reliable emissions monitoring and reporting systems, determining penalties for noncompliance, and allocating emissions reductions among participants, must be addressed in adopting any emissions-trading program. As a consequence, it will take time for EPA and the states to resolve these issues. Although the draft plan refers to EPA's using a range of strategic approaches to promote clean air and upgrading and improving air-monitoring networks, these details were too general to determine whether the draft plan intends to address these issues.

Working Better With the States

While EPA is ultimately responsible for overseeing the delivery of national environmental programs, the states are primarily responsible for day-to-day implementation. Despite the importance of a good EPA/state

¹⁵Air Pollution: Overview and Issues on Emissions Allowance Trading Programs (GAO/T-RCED-97-183, July 9, 1997).

relationship, we have reported that difficulties have characterized the relationship over the years.¹⁶ Resource limitations are a major cause of these problems. Federal funding has not kept pace with new requirements, and the states have been unable to make up the difference. This resource shortage has been exacerbated because EPA has sometimes required states to apply scarce resources to national priorities at the expense of some of their own environmental concerns. Also affecting the EPA/state relationship have been states' concerns that EPA (1) is inconsistent in its oversight across regions, (2) sometimes micromanages state programs, (3) does not provide sufficient technical support for increasingly complex program requirements, and (4) often does not adequately consult states before making key decisions affecting them.

In EPA's draft plan, strengthening partnerships is one of the agency's strategic principles. According to the plan, EPA will enhance its partnership with federal, tribal, state, and local agencies; the Congress; private industry; public interest groups; and citizens to identify environmental goals and work together to achieve them. Additionally, the introductory chapter describes the states' important role and EPA's May 1995 agreement with state environmental leaders to establish the National Environmental Performance Partnership System. Under the new system's performance partnerships, EPA and the states are to determine together what work will be carried out annually and how it will be accomplished. According to the plan, performance partnerships are helping to shape a fundamentally different relationship between EPA and the states. Furthermore, the chapter on assessing results discusses working with state environmental commissioners to draft core performance measures to provide a common basis for tracking progress and establishing commitments between the states and EPA.

The draft plan, however, does not contain any specific objectives or measures—such as increasing the number of states participating in the National Environmental Performance Partnership System—to provide a basis for measuring EPA's progress. Currently, about half of the states have signed performance partnership agreements with EPA.

Ensuring the Quality and Completeness of Scientific Research

EPA uses peer review to enhance the quality, credibility, and acceptability of scientific and technical work products, which may ultimately form the basis of regulations and other key decisions by the agency. In

¹⁶EPA and the States: Environmental Challenges Require a Better Working Relationship (GAO/RCED-95-64, Apr. 3, 1995) and Environmental Protection: Status of EPA's Initiatives to Create a New Partnership With States (GAO/T-RCED-96-87, Feb. 29, 1996).

January 1993, EPA issued a policy statement calling for peer review of the major scientific and technical work products used to support the agency's rule making and other decisions. (In accordance with scientific custom and/or statutory mandates, several offices within EPA have been using peer review for many years.) The Congress, we, and others later raised concerns that the policy was not being consistently implemented throughout EPA. In 1994, the policy was revised to expand and improve the use of peer review throughout the agency. However, in a September 1996 report and March 1997 testimony, we found that, despite some recent progress, peer review continued to be implemented unevenly.¹⁷ In some cases, the policy was followed properly, but in others, key aspects of the policy were not followed or peer review was not conducted at all.

In its draft strategic plan, one of EPA's strategic principles is to apply sound, peer-reviewed science. According to this principle, EPA will promote the development, peer review, and application of sound science to meet the agency's current program requirements and to guide future directions. In addition, more defensible environmental decisions through high-quality peer review is listed under the "Results Expected" section of the goal on sound science. Although the draft plan does not establish compliance with EPA's peer review policy as an objective, one of the performance measures under the goal is the endorsement of research results by peer review and other impartial, outside reviews.

Managing the Superfund Program

EPA's Superfund program began in 1980 as a relatively short-term project to clean up abandoned hazardous waste sites whose number, at that time, was thought to be limited. Since then, thousands of sites have been discovered—many of which are owned by the federal government—and cleaning them up has proved to be more complicated and costly than anticipated. Recent estimates show that cleaning up these sites could amount to over \$300 billion in federal costs and many billions more in private expenditures.

Under the Superfund law, EPA can compel the private parties responsible for hazardous waste sites to clean them up or it can conduct the cleanup and demand reimbursement of its costs from the responsible parties. Private parties perform about 75 percent of cleanups. To pay for EPA's cleanups, the agency has drawn on a legislatively established trust fund, primarily financed by a tax on crude oil and certain chemicals and by an

¹⁷Peer Review: EPA's Implementation Remains Uneven (GAO/RCED-96-236, Sept. 24, 1996) and Peer Review: EPA's Implementation Remains Uneven (GAO/T-RCED-97-95, Mar. 11, 1997).

environmental tax on corporations. Federal agencies generally use their annual appropriations to finance cleanups of the facilities under their jurisdiction.

The magnitude of the nation's hazardous waste problem calls for the efficient use of available funds to protect the environment and the public. We have reported in the past, however, that (1) EPA and other federal agencies have not consistently allocated their cleanup resources to reduce the most significant threats to human health and the environment; (2) although EPA is responsible for pursuing reimbursement when it funds a cleanup, it has recovered from responsible parties only a fraction of the moneys that it has spent; and (3) while about half of the Superfund program's budget annually goes to contractors, EPA has had long-standing problems controlling contractors' costs. In a 1997 report on the Superfund program's management, we noted that EPA and other federal agencies have taken steps toward addressing these problems, but further action is needed in each area.¹⁸ For example, in the area of contract management, we reported that EPA needs to improve the quality of its independent cost estimates and use them more effectively to determine the scope and size of its contractors' work budgets.

EPA's draft strategic plan addresses some of these problems in general terms. Two of the strategies under its better waste management goal are to (1) maximize potentially responsible parties' participation in conducting or funding response actions while promoting fairness in the enforcement process and (2) manage the use of contract dollars to improve performance and reduce cost. The draft plan also states under the effective management goal that EPA will enhance its contract management information systems.

Managing Information Resources

The Paperwork Reduction Act of 1995 and the Clinger-Cohen Act of 1996 direct agencies to implement a framework of modern technology management on the basis of practices followed by leading private and public organizations that have successfully used technology to improve performance and help meet strategic goals. Under these laws, agencies are to better relate their technology plans and information technology use to their programs' missions and goals. EPA's draft plan notes that the agency plans to integrate information technology investments with its overall strategic-planning process and implement best practices identified by us

¹⁸High-Risk Series: Superfund Program Management (GAO/HR-95-12, Feb. 1995) and High-Risk Series: Superfund Program Management (GAO/HR-97-14, Feb. 1997).

for information resources management. However, the draft plan does not clearly describe how these strategies will be carried out and how results will be measured.

Furthermore, EPA, like many other agencies, will face the emerging management challenges of implementing modern technology and resolving the need for computer systems to be changed to accommodate dates beyond 1999—the “year 2000 problem.” Yet, EPA’s draft plan does not discuss how the agency intends to address the “year 2000 problem” as well as any significant information security weaknesses—two issues that we have identified as high risk across the government.¹⁹

EPA’s draft plan also highlights the need for enhancing information systems to improve the quality and timeliness of management information and for integrating information technology investments with the agency’s overall strategic-planning process. However, strategies and measures for doing so are not specifically addressed in the draft plan. In commenting on a draft of this report, EPA officials said that the September 1997 version of the plan will address these information management challenges.

EPA Faces Challenges to Provide Reliable Information on Achievement of Strategic Goals

In its draft strategic plan, EPA points out that its new planning, budgeting, analysis, and accountability process will enable it to better manage for results. However, the agency does not currently have the reliable information it needs to measure results. The accountability component of the new system is being designed to allow EPA to obtain the information necessary to evaluate and report its progress toward its goals and objectives. Nonetheless, as we reported in June 1997, EPA faces substantial challenges to obtain the scientific and environmental information needed to fully support its new system, including determining progress toward meeting key environmental indicators. Furthermore, various problems in EPA’s financial data and internal control systems could hinder EPA’s ability to accurately measure cost information supporting its goals and objectives.

Scientific and Environmental Data

Although EPA has collected much scientific and environmental information, many gaps exist, and the data are often difficult to compile because different data collection methods have been used. Although EPA has tried to improve the quality of its data, these data are often unreliable, and the agency’s disparate information systems are not integrated. These

¹⁹GAO High Risk Series (GAO/HR-97-20, Feb. 1997).

shortcomings have been raised in various external and internal reports on EPA, including the Vice President's report on reinventing government.²⁰

Likewise, much effort is still needed to identify, develop, and reach agreement on a comprehensive set of environmental measures to link EPA's activities to changes in health and environmental conditions. Currently, EPA has to rely mainly on activity measures, such as the number of permits issued or inspections made, to measure its performance or success. In its April 1995 report, NAPA identified the lack of high-quality data on environmental conditions as a particularly important problem for EPA.

In our June 1997 report, we pointed out that EPA has been trying since the 1970s to revise its management systems to better manage for results. We observed that the agency will likely need several years to develop and fully implement an integrated planning, budgeting, and accountability system. Even with this much time, the agency will have difficulty obtaining the scientific and environmental data and developing and reaching agreement on the appropriate environmental measures of its programs' and its own performance called for by the new system. Given the complexity of these efforts and the time required to complete them, we recommended that the EPA Administrator, in consultation with key stakeholders, establish expectations or benchmarks for how the new system is to operate when fully implemented and use them to monitor the agency's progress in implementing the system. EPA agreed with our recommendation and the need to identify some measures of success for implementing the new planning, budgeting, and accountability system—that is, some way for the agency to know whether it is progressing toward the type of system intended.

In its draft strategic plan, EPA also recognizes that meeting its objectives will depend upon developing and using common indicators and measures with the states to track progress and establish commitments between the states and EPA. The plan briefly discusses the agency's efforts to work with the environmental commissioners of states to draft "core performance measures," which EPA expects will eventually be part of most state/EPA work plans and related agreements. While EPA and the states have various efforts under way to develop and use environmental measures and indicators, as stated in our June report on EPA's efforts to manage for results, these efforts, while valuable, have been disparate. For example, at a conference convened by EPA in September 1996 to better coordinate

²⁰Reinventing Environmental Regulation, National Performance Review (Mar. 16, 1995).

these efforts, state and EPA regional representatives said that (1) clarification is needed on EPA's and the states' direction in developing indicators; (2) some qualities of a good indicator are not well understood; and (3) in some cases, determining whether the best indicators have been chosen will take many years. Thus, it appears that it will be some time before EPA is able to develop and use a set of environmental indicators that accurately and comprehensively reflect the impact of its programs or their results.

Financial Data

EPA's Office of the Inspector General's (OIG) opinion on the agency's consolidated financial statements for fiscal year 1996 was, in part, qualified because data supporting amounts accrued for grantees' unbilled expenses could not be confirmed and estimates for unbilled Superfund oversight costs were not sufficiently accurate. The OIG's audit identified these same issues as resulting in internal control weaknesses that were deemed to be material weaknesses. Additionally, the OIG report cited a number of other reportable conditions in their evaluation of internal control. These reportable conditions included internal control weaknesses in areas, such as accounts receivable, property, and documentation of the agency's Integrated Financial Management System. While the strategic plan addresses a material weakness in the area of grant closeouts, it does not address the above issues that directly relate to the reliability of data supporting fiscal performance.

EPA officials told us that the September 1997 version of the strategic plan will contain more information on financial management. According to the officials, at a minimum, a performance measure for financial management will be added to the plan under the effective management goal.

Agency Comments

We provided EPA with copies of a draft of this report for review and comment. We met with EPA officials, including the Acting Deputy Director of the Office of Planning, Analysis, and Accountability and the Director of the Office's Planning Staff. The EPA officials said that the report is a fair and objective assessment of the July 1, 1997, draft strategic plan that we reviewed. The officials also said that they are continuing to revise the draft plan, will add the two missing elements required by the Results Act, and will incorporate the other improvements noted in this report. The officials also suggested clarifications or technical changes that we have incorporated, as appropriate.

We are sending copies of this report to the Minority Leader of the House of Representatives; Ranking Minority Members of your Committees; the Chairmen and Ranking Minority Members of other Committees that have jurisdiction over EPA's activities; the Administrator, EPA; and the Director, Office of Management and Budget. We will send copies to others on request.

Please call me at (202) 512-6111 if you or your staff have any questions about this report.

A handwritten signature in black ink, appearing to read "P. F. Guerrero". The signature is stylized with a large, looped initial "P" and a long, sweeping tail.

Peter F. Guerrero
Director, Environmental
Protection Issues

Enclosure

EPA's Draft Goals

1. Clean Air. The air in every American community will be safe and healthy to breathe, as determined by the latest, best scientific evidence. In particular, children, the elderly, and people with respiratory ailments will be protected from health risks of breathing polluted air. Strategies to reduce air pollution will also restore life in damaged forests and polluted waters.

2. Clean and Safe Water. All Americans will know that their drinking water is clean and safe. Effective protection of America's rivers, lakes, wetlands, aquifers, and coastal and ocean waters will sustain fish, plants, and wildlife, as well as recreational, subsistence, and economic activities. Watersheds and their aquatic ecosystems will be restored and protected to improve public health, enhance water quality, reduce flooding and provide habitat for wildlife.

3. Safe Food. The foods Americans eat will be free from unsafe pesticide residues. Children especially will be protected from the health threats posed by tainted food because they are among the most vulnerable groups in our society.

4. Preventing Pollution and Reducing Risk in Communities, Homes, Workplaces and Ecosystems. Pollution prevention strategies, risk management, and remediation strategies aimed at cost-effectively eliminating, reducing, or minimizing emissions and contamination will result in cleaner and safer environments in which Americans can live, work, and enjoy. EPA will safeguard ecosystems and promote the health of natural communities that are integral to the quality of life in this nation.

5. Better Waste Management and Restoration of Abandoned Waste Sites. America's wastes will be stored, treated, and disposed of in ways that prevent harm to people and to the natural environment. EPA will work to clean up previously polluted sites and restore them to uses appropriate for surrounding communities.

6. Reduction of Global and Cross-Border Environmental Risks. The United States will lead other nations in successful, multilateral efforts to reduce significant risks to human health and ecosystems from climate change, stratospheric ozone depletion, and other hazards of international concern.

7. Expansion of Americans' Right to Know About Their Environment. Easy access to a wealth of information about the state of their local environment will expand citizen involvement and give people tools to

protect their families and their communities as they see fit. Increased information exchange between scientists, public health officials, businesses, citizens, and all levels of government will foster greater knowledge about the environment and what can be done to protect it.

8. Sound Science, Improved Understanding of Environmental Risk, and Greater Innovation to Address Environmental Problems. EPA will develop and apply the best available science for addressing current and future environmental hazards, as well as new approaches toward improving environmental protection.

9. A Credible Deterrent to Pollution and Greater Compliance With the Law. EPA will ensure compliance with laws intended to protect public health and the environment.

10. Effective Management. EPA will establish a management infrastructure that will set and implement the highest-quality standards for effective internal management and fiscal responsibility.

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