

*How Evaluation Brought
Change to US EPA's
Environmental Enforcement
Training Program*

Zena Aldridge and Yvonne M. Watson, US EPA
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Agenda

- Background: What is NETI?
- Program Evaluation Competition
- Life Before the Evaluation
- Evaluation Purpose and Questions
- Methodology
- Recommendations
- Implementation, or Life After the Evaluation
- The Value of Evaluation

What is NETI?

- The National Enforcement Training Institute was created by Congress in 1990
- Mission is to train Federal, State, Local and Tribal environmental enforcement employees in the enforcement of the nation's environmental laws
- Also serve as an umbrella training organization for EPA's enforcement program
- In FY 2008, over 13,000 employees trained

EPA Evaluation Competition

- Competitive proposal solicitation process
- Provides \$200,000 – \$300,000 per year to support conduct of evaluations
- Headquarters and Regional Offices eligible
- Provides extramural \$\$ for contractor support
- Assigns advisors to provide evaluation expertise and technical assistance
- Provides program evaluation training

Before the Evaluation . . .

- May 2006: NETI presented a range of potential actions to senior managers, including:
 - identify training needs
 - plan the use of existing training resources
 - develop new training

Before the Evaluation

- While the senior managers agreed with several modest changes, in general they did not come to consensus on an overall training plan

Evaluation Purpose

- To determine:
 - whether NETI is meeting its mission of developing a highly skilled and professional workforce; and
 - how to better measure NETI's contribution to EPA enforcement's broader goal...

Evaluation Questions

1. Is NETI performing the right activities?
2. Are the existing measures NETI uses sufficient to determine if NETI is meeting the stated objectives of providing a skilled and professional workforce? What additional measures could be used?

Evaluation Questions

3. Has NETI's training program contributed to a highly trained and skilled work force that can deliver inspections and enforcement cases that can lead to environmental results?

Evaluation Questions

4. What needs to be improved for NETI's training program to:
 - a) contribute to a highly trained and skilled work force?
 - b) meet OECA's performance-based goals?

5. How can NETI assess if its training programs lead to a more efficient enforcement program?

Evaluation Questions

6. How can NETI assess its contribution to OECA's goal of achieving a 5 percent increase in complying actions taken during inspections; a 5 percentage point increase in the percent of enforcement actions requiring that pollutants be reduced, treated or eliminated; and a 5 percentage point increase in the percent of enforcement actions requiring improvements in environmental management practices?

Evaluation Questions

7. What is the most efficient combination of measurement tools, including pre- and post-tests; peer reviews of inspectors, attorneys, and other staff; follow-up surveys to training participants; and end-user surveys of facilities being inspected?

Evaluation Methodology

- Developed Logic Model of NETI Program
- Refined Evaluation Questions
- Identified Data Sources and Collected Data
 - Quantitative Data
 - Qualitative Data
 - Conducted Literature Review
 - Conducted File Review
- Analyzed Data
- Prepared Written Report

Recommendations

1. Determine NETI's Overall Role in Developing and Implementing the Agency's Training Program

Recommendations

2. Increased Oversight and Involvement in Non-NETI Developed Courses
 - Establish a data collection policy requiring offices who advertise courses through NETI to use a course Evaluation Form to collect output and outcome measures
 - Require offices submitting a new course to specify what knowledge and practical skills participants will take away from the workshop and bring back to their daily work and how the course will contribute to any core competencies for inspectors, attorneys, etc.

Recommendations

- Require offices to specify and demonstrate how their course aligns with OECA's existing national priorities, goals and objectives. Assess courses against the following criteria:
 - supports existing regulatory enforcement
 - aligns with existing national priorities
 - aligns with OECA's strategic goals and objectives
 - supports core competencies for a specific job function/position

- Create a formal process to solicit senior and mid-level management input and feedback on the identification and development of existing and new classroom courses and distance learning products

Recommendations

3. Identification of New Training Courses
 - Monitor the emergence of new regulations that impact enforcement activities and
 - convene a review board composed of a select number of managers and trainers OR
 - distribute new regulations to senior managers and existing NETI trainers to solicit input on whether a new course is needed or whether a new module can be appended to an existing course

Recommendations

4. Consider closer coordination with other EPA offices, enforcement managers and others regarding the development of new training courses

5. Identify which aspects of existing NETI courses address OECA's current priorities

Recommendations

6. As appropriate, assess the topic areas of interest identified by enforcement managers and determine which elements can/should be integrated into NETI-developed and other courses

Recommendations

7. Performance Measures and Data Collection Instruments
 - Use pre/post tests to assess changes in learning
 - Ensure consistent use and collection of existing NETI course evaluation form and Follow-up Questionnaire
 - Develop a schedule/cycle for systematic review of existing courses to ensure utility of course
 - Follow up with course participant supervisors and enforcement managers to evaluate effectiveness of courses in addressing manager's goals, motivating behavior changes and improving performance among trained personnel

Implementation

- ❑ Winter 07/08: Based on the Evaluation recommendations, NETI proposed three options to senior managers
- ❑ One was chosen and sent for review and comment
- ❑ After modifications, a new National Enforcement Training Plan was adopted to begin in FY 2009

Implementation

- The Plan was similar to the proposal made to the senior enforcement managers in 2006!
- What made the difference?

Implementation



NETI National Training Plan

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Date Entered	Training Title	Course	Organization	Delivery	Capacity	Location	Status	Start	Finish	Primary Statute
12/09/2008	RCRA Financial Assurance Training	RCR 206	OECA - Office of Civil Enforcement	Classroom		,HQ	Existing	TBD		RCRA/Underground Storage Tank Training
12/09/2008	Case Development Training	FIF 104	OECA - Office of Civil Enforcement	Classroom	50	,HQ	Existing	TBD		Multi-Statute Training
12/09/2008	Modeling Discharges to Waters-of-the-US		OECA - Office of Civil Enforcement	Classroom		,HQ	Developi	TBD		Water
12/09/2008	Ability to Pay for Attorneys and BEN for Attorneys	CST 127/125	OECA - Office of Civil Enforcement	Classroom	50	Chicago, IL	Existing	10/29/2008	10/29/2008	Case Support Training
12/09/2008	Basic ABEL, Intermediate ABEL, Munipay, Basic Indipay, Ability to Pay for Attorneys, Basic BEN, BEN	CST 14/127/11	OECA - Office of Civil Enforcement	Classroom	40	New York, NY	Existing	11/17/2008	11/21/2008	Case Support Training
12/09/2008	Basic ABEL, Intermediate ABEL, Basic INDIPAY, Ability to Pay for Attorneys, BEN for Attorneys, Advanced BEN	CST 1114/127	OECA - Office of Civil Enforcement	Classroom	50	San Juan, PR	Existing	12/08/2008	12/11/2008	Case Support Training
12/09/2008	Ability to Pay for Attorneys, Basic BEN, BEN for Attorneys	CST 27/103/12	OECA - Office of Civil Enforcement	Classroom	50	Sacramento, CA	Existing	01/05/2009	01/06/2009	Case Support Training
12/09/2008	Ability to Pay for Attorneys, Basic BEN, BEN for Attorneys	CST 27/103/12	OECA - Office of Civil Enforcement	Classroom	50	Riverside, CA	Existing	01/07/2009	01/08/2009	Case Support Training
12/09/2008	Basic ABEL, Intermediate ABEL, Basic MUNIPAY, Basic INDIPAY, Ability to Pay for Attorneys, Basic BEN,	CST 14/127/11	OECA - Office of Civil Enforcement	Classroom	50	Phoenix, AZ	Existing	01/12/2009	01/16/2009	Case Support Training

NTP

Implementation

- During FY 2009, all enforcement offices that hold training events must use NETI's Standard Evaluation Form for post-course evaluation

Implementation

- Of the 7 evaluation recommendations, NETI has been able to begin implementing all or part of 4 of them:

Implementation

Recommendation: Determine NETI's Overall Role in Developing and Implementing the Agency's Training Program

Program Change:

- National clearinghouse of training plans
- National training statistical analyses
- Standard evaluation analyses (level 1)

Benefits: increased communication, shared training opportunities, less duplication

Implementation

Recommendation: Establish a data collection policy requiring offices who advertise courses through NETI to use a course Evaluation Form to collect output and outcome measures

Program Change:

- All enforcement training activities are required to use the NETI Standard Evaluation Form in FY 2009

Benefits: standardized data for national analyses of training

Implementation

Recommendation: Require offices . . . to specify what knowledge and practical skills participants will take away from the workshop and bring back to their daily work . . .

Program Change:

- in database, users must include the course objective (at the end of the class, students will be able to . . .)

Benefits: identifiable knowledge and skills presented to enforcement staff

Implementation

Recommendation: Require offices to specify and demonstrate how their course aligns with OECA's existing national priorities, goals and objectives

Program Change:

- Database requires details such as which national priority or core program the training activity supports

Benefits: determine whether training activities align with goals and strategies

Implementation

Recommendation: Identify which aspects of existing NETI courses address OECA's current priorities.

Program Change:

- NETI's courses are included in the National Training Plan database and include users must include the course objective (at the end of the class, students will be able to . . .)

Benefits: identifiable knowledge and skills presented to enforcement staff

The Value of Evaluation

- The Process
 - Improved staff's understanding of the steps in the evaluation process
 - Greater appreciation/value of program evaluation
 - Competition process provided access to staff with knowledge of EPA's culture and evaluation expertise
 - Provided objectivity

The Value of Evaluation

- The Product (Evaluation Report)
 - Provided evidence of program effectiveness and areas of concern for senior managers
 - Impartial evidence to support/confirm observations made by NETI staff
 - Gave concrete steps for improvements

The Value of Evaluation

- Progress/Next Steps
 - Tool useful to introduce new managers to the merits of the program
 - Provided a clear pathway forward for implementation of recommendations and assessing program progress and change