

Desk Top Guide to *Partners for the Environment*

U.S. Environmental Protection Agency's
Partnership Programs



Office of Policy, Economics, and Innovation
401 M. St. SW, Mail Code 1803
Washington, D.C. 20460
202-260-6135
www.epa.gov/partners

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Desk Top Guide to Partners for the Environment

U.S. EPA's Partnership Programs

INTRODUCTION

Over the past decade, EPA's national strategy for protecting the environment has been changing in important ways. These changes include a new emphasis on partnership programs, known collectively as *Partners for the Environment*. EPA launched its first two partnership programs in 1989; now in 1999 there are more than 40. Through these partnership programs, EPA is demonstrating that voluntary goals and commitments achieve superior environmental results in a timely and cost-effective way.

With the advent of the year 2000, *Partners for the Environment* maintains its commitment to achieving improved environmental results through creativity and ingenuity. Partnership programs are advancing the Agency's mission to protect human health and the environment by making significant contributions to:

"Absolutely key to EPA's success is forging strong partnerships— businesses, communities, environmentalists, public health groups, government at all levels— pooling time, talent and resources to find protective, common-sense, cost effective solutions." - Carol Browner

- reducing emissions, pollution, and pesticide risk;
- conserving resources;
- improving energy efficiency;
- saving money;
- effecting institutional changes throughout business and industry; and
- serving as laboratories for testing new and innovative approaches to environmental protection.

The *Desk Top Guide* is designed primarily for EPA employees who are considering designing and/or implementing a new partnership program. It captures the best advice of staff with several years of experience who have partnered with companies on a voluntary basis. You are invited to use it as a guidance tool and reference document for building a sound partnership program. More important, consider the *Desk Top Guide* as an open invitation to work with a group of committed individuals who represent partnership programs in the Agency, the Partnership Program Coordinating Committee (PPCC).

For a quick overview of *Partners for the Environment*, check us out at www.epa.gov/partners

The Role and Value of Partnership Programs

All *Partners for the Environment* programs strive to significantly impact environmental problems through creative and innovative solutions. Partnering employs a distinct approach from

that taken in our traditional capacity as a regulator. A 1999 characterization¹ of partnership programs found that *Partners for the Environment* address eight of EPA's ten strategic goals, with pollution prevention often cited as a primary goal of most programs. Partnership programs complement current regulations by providing an additional tool to motivate business, industry and communities to improve their environmental performance voluntarily. They are not attempts to circumvent traditional regulatory programs nor render the current regulatory system obsolete.

Partnership programs' strength lies in their flexibility to address complex environmental problems in the context of a rapidly changing economy – where increased productivity comes less from manufacturing advances and more from knowledge-based services. The emergence of new environmental issues, a better informed public and the increasing importance of market-based incentives for improving corporate environmental performance all significantly increase opportunities for voluntary programs. The best partnership programs take advantage of these trends to create powerful, effective environmental programs which advance the goals of both private industry and the Agency.

Already, the benefits to partners and to the environment are compelling. Partners set ambitious goals to conserve water and energy, and reduce greenhouse gasses, toxic emissions, solid wastes, indoor air pollution and pesticide risk. In 1998, partners reported:

- eliminating 7.8 million tons of solid waste;
- saving nearly 1.8 billion gallons of clean water;
- preventing the release of 80 million metric tons of carbon dioxide, the primary pollutant linked to global warming and the equivalent of removing 17 million cars from the road;
- saving 510 trillion BTUs of energy; and
- saving \$3.3 billion from their combined efforts to prevent pollution, increase efficiency, and conserve natural resources.

Results like these clearly demonstrate the environmental and economic benefits of EPA's partnership programs.

¹*Characterization of Selected EPA Partnership Programs*, Final Report May 20, 1999.

PART I A FRAMEWORK FOR PARTNERSHIPS

Partners for the Environment and the Partnership Program Coordinating Committee

Though partnership programs are housed throughout the Agency and Regions, they share a common structure and framework. Understanding that structure will benefit you and your program. Within it, there are different opportunities for participation – consultation, shared problem-solving, education, collaboration – each with its own advantages to your program.

Partners for the Environment: **The Designation for Partnerships Agency-wide**

EPA's partnership programs address a variety of environmental needs. Collectively, the programs known as *Partners for the Environment* include voluntary partnerships between EPA and external entities - primarily business and industry, but also governmental agencies, environmental and public interest groups, communities and private citizens - aimed at achieving improved environmental results. These cooperative relationships are:

- voluntary, non-regulatory;
- mutually beneficial to all parties;
- based on shared goals and joint responsibility;
- interactive and reciprocal; and
- non-prescriptive.

In this document, the terms "partnership programs" and "*Partners for the Environment*" are used interchangeably. Please note that both refer to partnership programs which match the above definition *and* are part of the Partnership Programs Coordinating Committee.

Partnership Program Coordinating Committee: **A Support System for Partnership Programs**

In 1995, the Partnership Programs Coordinating Committee (PPCC) was established to encourage partnership programs to network and build an alliance in support of their unique approach to environmental protection. It is staffed by people who work directly and indirectly with partnership programs in both Headquarters and the Regions. Then-Deputy Administrator Fred Hansen signed the Charter for coordination of EPA's partnership programs on August 8, 1998.² The Charter establishes the roles of the PPCC, the Office of Reinvention (now the Office

² See Appendix B: Charter for Coordination of EPA's Partnership Programs

of Policy, Economics, and Innovation), and the Reinvention Action Council Advisors (RAC).³

Today, more than 40 partnership programs work through the PPCC to share lessons learned and to jointly solve or raise common issues. Partnership representatives from all media offices, OECA, ORD, and the 10 Regions serve on the PPCC. Members work together to:

- provide up-to-date information on partnership programs and their successes;
- jointly market *Partners for the Environment* programs;
- identify and address cross-cutting policy issues as needed and recommend options to the RAC;
- review and provide advice to new partnership programs to ensure coordination and consistent external communication; and
- prepare guidance on development, implementation and evaluation of partnership programs.

The Office of Policy, Economics, and Innovation (formerly the Office of Reinvention) is responsible for coordinating the activities of the PPCC. The Deputy Associate Administrator is the permanent co-chair of the PPCC. Another senior EPA official, such as a Deputy Regional Administrator or a Deputy Assistant Administrator, serves as co-chair on a rotational basis for a two-year term. Co-chairs assign staff to support for the activities related to partnership programs coordination. The Office of Policy, Economics, and Innovation:

- provides day-to-day management of PPCC functions and maintains a central repository of information on partnership programs;
- coordinates with the PPCC to support new partnership programs;
- serves as the initial Agency contact for general inquiries about partnership programs;
- identifies cross-cutting policy issues, assists the PPCC and RAC Advisors in resolution of issues as needed, and involves or informs the RAC and AAs about partnership programs; and
- encourages that partnership program evaluation be conducted and used to identify improvements in how the Agency does business.

Collaborating with the Partnership Coordinating Committee: Increasing Your Success

New endeavors at EPA tend to raise the question, "Is anyone else doing this?" Working through the PPCC helps answer this question by providing immediate and easy access to Agency staff working in partnerships and by providing information about whether or not other programs are addressing similar environmental problems or reaching the same target audience. The *Partners for the Environment* charter, in fact, calls for all EPA partnership programs to be represented on the PPCC. Offices with multiple partnership programs may have one

³ See Appendix B: Charter for Coordination of EPA's Partnership Programs

representative who takes the lead in maintaining a relationship with the PPCC, but all partnership program staff are encouraged to attend meetings. Many find it advantageous to hear and share information first hand and attend the meetings regularly.

If you have not attended a PPCC meeting, contact the Office of Policy, Economics, and Innovation (OPEI) and meet with the Partnership Program Coordinator, the primary contact for partnership programs Agency-wide, to get information about upcoming meetings or events. You can also discuss the key aspects of your program - desired outcomes, sectors/entities whose actions your program seeks to affect, incentives used to encourage partners- to help orient your program with the others in the Agency. The Partnership Program Coordinator can refer you to other program managers doing similar work so you can best take advantage of the experience at hand.

For more information on *Partners for the Environment*, check out our Web site at www.epa.gov/partners. From there, you can link to all EPA individual partnership program sites.

Benefits of Collaboration

The PPCC provides a forum for exchanging Agency expertise on partnership programs. Three primary benefits of collaborating with the PPCC include cross-program learning, access to experts, and leveraging resources.

Cross-Program Learning

Partnership programs are often laboratories for testing new ways of doing business. Individually, programs address different environmental problems, but collectively they share many of the same operational challenges and successes. For example, getting partners to report results is difficult for everyone. Discussions concerning programs' data collection efforts and strategies, or partners' responses, are typical conversations that surface in PPCC meetings. Programs also share information and lessons learned about program evaluations and performance measures, providing valuable teaching tools in these critical topic areas. A primary activity of the PPCC, therefore, is fostering this type of cross-program learning among members.

Access to Experts

Many members of the PPCC have a long history with the partnering approach; others are at earlier stages of program development. Access to a collective source of experience is valuable for anyone considering a new partnership program. As existing programs mature, they routinely share their successes and challenges with newer programs. Bringing your questions and ideas to this group will expose you to a wide range of expertise in what works and what doesn't work when using a partnership approach.

Leveraging Resources

Perhaps the most significant benefit of working together with fellow partnership programs is leveraging resources. For example, joint marketing both publicly and within the Agency helps promote *all* of the partnership programs. The Office of Policy, Economics and Innovation maintains a Web site with all the *Partners for the Environment* programs listed and with links to individual Web sites. OPEI is also increasingly responding to inquiries about partnership programs by linking potential partners with appropriate programs and by networking across partnership programs to provide support to specific industrial groups. Being part of the whole ensures that you, too, tap into and benefit from these resources.

PART II

STARTING A PARTNERSHIP PROGRAM

Preliminary Steps to Creating a Partnership Program

EPA is increasingly using partnerships to improve environmental protection. But is a partnership program the best solution for the environmental problem you face? Before designing, creating or implementing any new initiative, there are many factors to consider. A thoughtful review of the following questions should help you evaluate the pros and cons of starting a new partnership program.

- ' Do existing EPA programs or initiatives already address the issue you are exploring? If so how does your proposal compare to the existing programs? How does it differ?
- ' Is the issue covered under specific statutory or regulatory authority? On occasion your program may have to explain its purpose based either on specific legislative authority or on its ability to achieve the Agency's federal mandate. (Please see Appendix C for important guidance from the Office of General Council regarding partnership programs).
- ' Will you be targeting a specific industrial sector, such as print shops or auto repair services? If so, what is the relationship between EPA and that sector? Is the relationship one of collaboration or is it adversarial?
- ' Have others expressed an interest in addressing the issue voluntarily? Often, trade associations or even other federal agencies are working on the same issue.
- ' Do stakeholders perceive this issue as high priority?
- ' Does your target audience (prospective partners) perceive this issue as high priority? No matter how important this is to your office, if it isn't important to the partner it isn't likely to succeed as a voluntary activity.
- ' What are the incentives to encourage participation? There is no single motivator for encouraging voluntary partnering. Each environmental concern and each target group represents new opportunities for creativity and innovative approaches.

Thinking critically about these Agency-wide and external stakeholder questions beforehand will help you determine whether or not a partnership program is likely to be effective for achieving your goals and objectives. It is also important, however, to consider internal support issues within your own organization. Specifically:

- ' What are the incentives for you and your office to implement such a program?
- ' What kind of resource commitment does it require and can you meet that commitment?
- ' Do you have support of middle and senior management?
- ' Do you have support of your colleagues?

Failing to consider these support issues may cause significant obstacles in starting a new program. This is not meant to dissuade you, but rather to encourage all employees to recognize how these issues affect your daily work. These questions should serve as catalysts for you to get

senior management on board from the beginning and to encourage you to do some internal lobbying before proceeding.

If you do conclude that a partnership program is advantageous and has internal support, there are a number of steps to take to ensure that your program is created with the greatest chance for success. The first step is to consult with the PPCC (See Part I.) This will allow you to benefit from cross program learning, access to expertise, and leveraging of resources. In short, it will allow you to take advantage of the wealth of knowledge available concerning partnership programs.

The next step is to think about program design. In May 1999, OAR published a *Characterization of Selected EPA Partnership Programs* that helpfully outlined all partnership programs based on the following criteria:

- Primary Environmental Objective
- Key Desired Outcomes
- Key Sectors/Entities Whose Actions the Program Seeks to Effect
- Key Incentives
- Key Methods the Program Uses to Encourage Desired Actions
- EPA Strategic Goals Promoted
- Program Elements

If you consider the legal and design issues below, you will address these criteria and lay the ground work for an effective program that is likely to succeed.

Legal Considerations

Partnership programs must meet the letter of the law that guides EPA's mission and the relationship that is built between EPA and members of the public. As you consider the design suggestions laid out below, be aware of the legal guidelines that are also a critical part of your success. Become familiar with these several areas of concern:

- Legal Authority to Undertake the Program
- Federal Advisory Committee Act (FACA)
- Legal Limitations or Restraints on Budget
- Partner Agreements
- Promoting Partnerships

It is important to review Appendix C for further explanation about each of these areas. Contact the Office of General Counsel for guidance on specific questions you may have.

Designing a Program

So how do you start? Where do you start? Program success depends upon clear goals and objectives from the outset coupled with reliable methodologies for measurement and evaluation over the long term. Stated simply, know where you are now, where you are going, how you are going to get there, and how you will know once you have arrived. Here are 10 helpful steps to designing a successful program.

1. Identify the Problem
2. Involve Stakeholders
3. Identify Partners
4. Establish Program Goals and Objectives
5. Choose a Program Approach
6. Build in an Evaluation Process
7. Determine Incentives and Benefits of Participation
8. Scope out a budget
9. Develop a communication strategy
10. Prepare an exit strategy

1. Identify the Problem

Clearly state the problem you are trying to solve. Is the problem one of poor environmental performance on the part of a certain sector or is it a specific environmental impact that needs to be addressed? Is there a geographical area that needs particular attention? Once you identify the problem, you can start to strategize about how to solve it, whom to target, and what approach to take. Framing your program around a well-defined problem will allow you to better design and implement your program, as well as clearly communicate your mission to others. The problem statement should be the "constant" to which you can always return to benchmark your progress and results, e.g., the "variables."

"When we were designing the program initially, we took several design options on the road and discussed the options with stakeholders. These conversations were very useful; we based our decisions in many cases on what we learned from them. Having a few potential partners willing to do this early on may help pave the way for quicker success." Partnership Program Staff

For example, as supplies shrink and demands rise, competition among industrial, agricultural and domestic uses for available water resources rises. Through the Water Alliances for Voluntary Efficiency (WAVE) program, EPA seeks to ensure that adequate U.S. water resources remain available to support both human and environmental needs. The WAVE program protects the environment and sustains wildlife habitats by

reducing water use, wastewater discharges, and energy use. Less wastewater and reduced consumption mean less energy is needed to heat, pump, and process water. This translates into both water and energy savings. Thus, WAVE addresses the problem of resource conservation with technical support that enables firms to improve water and energy efficiency.

2. *Involve Stakeholders*

EPA has learned a tremendous amount in recent years about the value and benefit of involving outside parties to participate in decision making processes— in particular, those parties that stand to be most affected by EPA decisions— our stakeholders. As the Agency moves toward increasing the opportunities and quality of stakeholder involvement at EPA, we are growing to rely on stakeholder input as an integral component in defining and developing new programs. In doing so, the Agency must be careful to comply with the Federal Advisory Committee Act (FACA).

Our stakeholder community extends well beyond commonly thought of industry partners. Many partnership programs seek support from trade associations, state and local governments, and professional organizations. The Landfill Methane Outreach Program (LMOP), for example, forms partnerships with individual states to lower barriers and increase opportunities for landfill gas energy recovery. Although LMOP's official partners are states, the LMOP network includes alliances with utilities, the landfill gas-to-energy industry, and trade associations. Although perhaps not obvious at first glance, these key players are all stakeholders with vested interests in the impacts and outcomes of the program.

The Environmental Technology Verification Program (ETV) also relies heavily on stakeholder involvement. ETV is carried out through a wide variety of partnerships with public and private testing and evaluation organizations, each guided by the expertise of a stakeholder group. These groups consist of buyers and users of technology, developers and vendors, state and federal regulatory personnel, and consulting engineers. ETV stakeholder groups assist in developing policies and procedures, prioritizing types of technologies to be verified, and designing and implementing outreach activities to the verification customer groups they represent.

Critical thinking about stakeholders, therefore, involves being cognizant of FACA and considering not only those directly involved or affected by your program, but also those who have an impact on your potential partners, or the *indirect* stakeholders. Including all relevant parties requires a little bit of ingenuity and a lot of public outreach. It challenges us to think “outside our box” and consider all perspectives on a given issue.

Consumer Labeling Initiative: The Importance of Building Trust

The Consumer Labeling Initiative (CLI), is an effort to put consumers' needs first by helping customers find, read, and understand labels and information so that they can compare household products and use those products safely and effectively. When the initiative started, industry assumed that EPA wanted to issue a new rule, so they were hesitant to engage with CLI staff. CLI did not require new laws, however. Rather, it aimed to benefit consumers with improved and increased communications with responsible corporations and citizens. After the initial misunderstanding, CLI realized that their challenge lay in anticipating misconceptions and then figuring out the fastest way to convey the *right* message. They spoke to large corporations on their terms; proving that consumers would be happier and company's bottom lines would be improved as a result of CLI. As soon as CLI got this message across, the big companies jumped on board and trade associations followed closely behind. Three years later, CLI has replaced suspicion and recalcitrance with collaboration and built mutual trust among stakeholders.

3. Identify Partners

To actively engage and encourage partners' participation, you must clearly define your target audience. Put simply, make sure the right people are at the table. One way to think about your target audience is to think categorically. Some programs work with partners in specific sectors or subsectors, such as agriculture or electronics. Others target partners that share certain characteristics like small businesses, waste generators, or communities. Still others choose partners based on a specific environmental issue, such as greenhouse gas emissions or solid waste disposal, or on an expected response to a certain kind of incentive or approach.

Thinking categorically, a program addressing urban sprawl, toxic release, or pesticide risk might target the sector or group which has the greatest impact or poses the greatest threat to that issue. The Pesticide Environmental Stewardship Program (PESP) employs this approach. Conversely, AgStar and the State and Local Outreach Program first identify their target audience (dairy and swine operations or local governments) and then design their program around audience needs. Whatever your approach, certain rules of thumb pertain to all programs.

- T Know and research your target audience:* Do your homework and get some background information on your prospective partners beforehand.
- T Offer incentives accordingly:* Incentives offered too broadly often lose their impact, while programs targeting hostile or uninterested partners are handicapped from the beginning, regardless of their incentive
- T Understand your partner's motives:* Know your prospective partners' high priority concerns. Understand if and why partners want to participate. Are their motives financial? Are they looking for public recognition? Are they eager to keep the regulatory community off their back?
- T Gauge partner interest:* Has the target audience come forth voluntarily or are you doing a

lot of pushing and prodding trying to sell them on your idea?

- T Facilitate open and effective communication:* Positive and constant interaction throughout the entire process is crucial to successfully engage partners and sustain productive relationships.

These practical considerations, taken together, will maximize transparency with partners about program goals and objectives and facilitate open and effective partnerships.

4. Establish Program Goals and Objectives

It is crucial to establish goals and objectives, preferably quantitative ones. The Agency is increasingly striving toward more vigorous program evaluation and increased use of performance measures. Rather than setting your goals in terms of outputs, such as the number of partners participating, think about outcomes, such as dollars saved, emissions reduced, or tons of solid waste eliminated from the waste stream. As the Agency now measures performance based on GPRA criteria, be sure to maintain a results-oriented focus.

5. Choose a Program Approach

Each partnership program incorporates its own unique program design or approach into its framework. The *Characterization of Selected EPA Partnership Programs* provides commonly used program designs. In practice, programs mix and match approaches, using a variety of tools and incentives to accomplish program goals. These different approaches provide elements of design, or “building blocks,” for individual programs. You may choose to incorporate any or all of the following approaches into your program design.

- *Provide recognition and awards:* Recognize environmentally positive practices and achievements, and conduct national, state and local award ceremonies and recognition programs. Be mindful of Agency guidance on the use of appropriated funds for awards and ceremonies. (Climate Wise, Waste Wise, Pesticide Environmental Stewardship Program)
- *Promote outreach and education:* Improve access to and flow of information among decision makers; improve the quality and quantity of information generated; provide technical and educational assistance. (Adopt your Watershed, Environmental Accounting Project)
- *Enable cost savings:* Promote practices and technologies that shift to more environmentally beneficial and cost-effective products or processes, or reduce operation and compliance costs directly. (Water Alliances for Voluntary Efficiency, Design for the Environment)
- *Facilitate market transformation:* Sustain change in inefficient markets by increasing supply and demand of energy efficient equipment and labels or develop public preference for environmentally friendly products and services. (Energy Star)
- *Promote environmental stewardship:* Encourage environmental improvements that extend beyond actions required by law or maintained as status quo; influence decision making by encouraging partners to “do the right thing” for environmental protection. (Pesticide

- Environmental Stewardship Program)
- *Build capacity*: Help partners with limited know-how identify and characterize problems, set priorities, develop action plans, or connect with other interested parties. (State and Local Outreach Program)
- *Advance new technology*: Test new technologies and promote proven ones by removing economic and technical barriers; promote increased use of new pollution prevention technologies to supplement or replace existing ones. (Environmental Technology Verification, AgStar)
- *Provide regulatory flexibility*: Offer regulatory, policy, or procedural flexibility to regulated parties in order to achieve better environmental results. (Project XL)

6. Build Evaluation Into the Process

“In WasteWise, we live or die based on our ability to deliver credible, numerical measures of progress. As a result, we spend enormous amounts of time trying to design measurements that are meaningful and to which our partners will respond.” –Director, Waste Wise

Evaluation is important because it allows you to assess the effectiveness of your program, it demands accountability from partners and EPA staff, and it lets you communicate your achievements to others. EPA’s increased emphasis on flexible, cooperative and performance-based management necessitates better and more rigorous evaluation. Quantifiable goals are desirable because they make benchmarking possible, they promote competition and they drive continuous improvement.

Evaluation isn’t always easy, however. It requires us to set priorities, define our universe, normalize data and verify our reporting and testing techniques. There is room for misinterpretation and worse, miscalculation. But nothing is impossible! At first, use consensus building to define measures. Keep the effort simple and small in the beginning; the evaluation process will gradually grow to include more complex and holistic measures. Consider using tools such as the Global Reporting Initiative (GRI)⁴ from the Coalition for Environmentally Responsible Economies (CERES)⁵ to come up with environmental indicators.

Remember that results are critical to engage senior management, secure discretionary funding and gain recognition. Supervisors respond to numbers and the best way to measure and communicate program success is through quantitative measurement. This short list of steps can

⁴ The Global Reporting Initiative, convened by CERES, was established in 1997 to design globally applicable guidelines for preparing enterprise-level sustainability reports. See www.globalreporting.org/

⁵ CERES is a non-profit coalition of investors, public pension funds, foundations, labor unions, and environmental, religious and public interest groups, working in partnership with companies toward the common goal of corporate environmental responsibility worldwide. See www.ceres.org/

serve as a starting point in your evaluation process:

- Set baselines from which you can measure all future success (i.e., evaluate the situation at the beginning so you can measure improvements);
- Set quantifiable goals
- Create benchmarks or milestones to gauge your progress along the way;
- Use performance measures (consider outcomes rather than outputs). Environmental benefits and cost savings are examples of two such measures.

7. Determine Incentives and Benefits of Participation

When meeting with stakeholders, take time to learn what is important and valuable to them as a group so that your program can be designed with partner-identified motivators in mind. Creativity and innovation play an important role in designing a program that not only benefits the Agency, but also entices prospective partners to join in a cooperative role with a regulator.

As you determine what kind of incentives to build into your program, balance the incentives or benefits provided to partners according to the action undertaken. For instance, you might host a public recognition ceremony for a business that has reached exceptional environmental goals, but simply offer a certificate of acknowledgment for partners who have taken a first step toward program commitments.

To increase your understanding of using incentives, it will be useful to consult a report titled, **Using Incentives in EPA Programs**,⁶ developed by a cross-Agency work group, to help Agency staff better understand the use of incentives in EPA's regulatory and non-regulatory programs.

The Metal Finishing Goals Project found that accessible, easy to understand compliance information about their sector was not available. They have since produced a plain language compliance manual to be kept on the shop floor, easily available to production managers. This manual proved to be an excellent tool and one of the best benefits to come out of the industry's partnership with EPA.

8. Scope Out a Budget

A 1999 survey showed that budgets for partnership programs range from \$150,000 to just over \$1 million. Many programs spend a significant percent of their budgets on contractor assistance to manage data bases or produce marketing and outreach materials. Some items to consider when you develop a budget for partnership programs include:

- T What size staff will be required to get started and to adequately implement your program?
- T What is the Agency's *and* the partner's cost, if any, of the incentive(s) you are offering?
- T Will a data base be required to adequately manage partner information and communications?

⁶ See Appendix D

- T What types of outreach are needed to promote the program?
- T Will a Web site be created and if so, what is the cost of developing and maintaining it?
- T How will you budget for the cost of evaluation?
- T Is contractor support necessary?

Partnership programs participating in the PPCC all face budgetary challenges. Conferring with them may give you insight to answer these questions and help in your initial budget preparation.

9. Develop a Communication Strategy

Communications strategies target many areas, such as recruitment or promotion of new EPA programs. Initially, your communications may be aimed at recruiting partners. Consider all available channels of outreach – trade associations, meetings, conferences, direct mail, Web sites, list servers, satellite broadcasts, etc. Once partners start signing up, you will need to maintain contact with them to keep them up-to-date on program information and to ensure their level of enthusiasm remains high. Personal contact and word of mouth figure prominently in creating interest in programs, so fostering strong relationships with current partners can lead to new contacts for potential partners. Web sites, list servers, and newsletters all help keep the partner network alive.

Partnership programs invest on average about 20 percent of their budget on marketing. Many develop logos and symbols to create visual icons or use a consistent set of colors to create a memorable look. Name recognition and recall are especially important when you rely heavily on word of mouth. Professional marketing assistance is an asset and one to be seriously considered at some stage of program maturity. A label recognizing energy efficiency, for example, makes a strong case for Energy Star products.

Of course, one of your most difficult audiences may be the one in your own backyard – EPA staff. Getting internal recognition for work that is not part of EPA's traditional approach is a challenge to partnership programs. Seek opportunities to tell your story, share your success and market your program at staff meetings and in offices where you can leverage resources to improve outreach. Be sure to highlight any program evaluation results or summaries of environmental results to communicate your message to fellow EPA staff.

10. Preparing an Exit Strategy

Trying to envision the end goal will provide a helpful road map as your program grows and develops. Will your program always exist? Is its goal finite so that someday you can reach an end point and declare success? Is your mission ongoing and adaptive to the needs of the present? Preparing an exit strategy (or purposefully deciding not to use one) is a step rarely taken in program design, but it can be a beneficial part of the planning process.

There are two exit strategies to consider. One is for partners who successfully meet their goals and another is for the program as a whole.

Initially, you will drive hard to get a considerable number of partners to participate in your program. Mature programs see that different strategies are needed for different types of partners, such as for those who have achieved their goals and for those who are still struggling. Once a partner reaches their goal, will you retain them as a partner? For what purpose? Is there a role for the achievers in your program? For those who sign up but don't act, how long will you carry them on your rolls? There are no right answers for these questions, but they are important to ask and perhaps easier to answer in the beginning of the process rather than at a crucial point requiring a decision.

IN CLOSING

There is no single definition specifying who or what a partnership program is. In fact, *Partners for the Environment* depends on diversity, flexibility, and entrepreneurship. That said, it is important to remember that many programs do share some distinct commonalities. We aim to voluntarily improve environmental performance and results of business, industry and communities and carry out our programs in ways that assure compliance with applicable laws and regulations, (even when compliance makes our programs a bit more complicated). We commit to setting clear and quantifiable goals and to measuring how we do in meeting those goals. And lastly, we are in a continuous process of learning and self-improvement, looking within and outside the Agency to tap into some of the best thinking about emerging environmental issues and strategies for tackling those issues.

As you process the information in this guidance, we hope to have answered questions about the nuts and bolts of partnership programs. More than likely, we have raised more questions than we have answered, but those questions are the ones that will steer you toward creating a successful and sustainable partnership. We encourage you to bring those questions (that we couldn't or didn't anticipate) to the PPCC, and we will work with you to ensure that the expertise and experience of *Partners for the Environment* is shared and used for the benefit of all.

APPENDICES

APPENDIX A

Examples of different ways partnership programs approach environmental problem solving.

Programs that address non-regulated environmental concerns:

Climate Wise is encouraging companies to change their thinking about energy use and efficiency. As part of the nation's Climate Change Action Plan, Climate Wise has partnered with nearly 500 companies, representing more than 1.4 percent of US industrial energy use. Under the program, companies evaluate all aspects of their operations to identify opportunities to increase energy efficiency and reduce greenhouse gas emissions. Collectively, Climate Wise partners have committed to reducing 620,000 metric tons of emissions, the equivalent of taking 2.2 million cars off the road.

Programs that achieve environmental performance beyond that required in regulated areas:

The Pesticide Environmental Stewardship Program (PESP) operates on the premise that while society benefits from pesticides, some pesticides also present risks. PESP is working to reduce pesticide use and risk through a combination of innovative approaches to integrated pest management, annual grant awards, educational outreach, and development of predictive models and information management systems that ensure effectiveness of pesticide applications.

Programs that explore innovative ways to collaborate with partners to address environmental problems:

Design for the Environment (DfE) helps selected industry sectors incorporate environmental considerations into their operations. Through partnerships with various industry sectors and stakeholders, DfE evaluates environmentally friendly alternatives to current processes and finds incentives to encourage continuous environmental improvement. New information is gained and shared on the environmental, economic, and performance implications of traditional and alternative manufacturing methods and technologies.

Programs that promote environmental stewardship through pollution prevention

Natural landscaping, a Region 5 initiative, prevents pollution, enhances biodiversity and encourages sound ecological practices through natural landscaping– the use of plants native to the region at the time of European settlement in North America. EPA promotes the use of native plants whenever practicable in landscape projects. Natural landscaping has numerous advantages over conventional turf lawns, including reduced landscaping installation and maintenance costs; avoidance of lawn chemicals; improved habitat and water management; aesthetic benefits; and environmental stewardship.

APPENDIX B

Partnership Programs Charter and Cover Memorandum

MEMORANDUM

SUBJECT: Coordination of EPA's Partnership Programs

FROM: Fred Hansen
Deputy Administrator

TO: Assistant Administrators
Regional Administrators
Associate Administrators
General Counsel
Inspector General

EPA's partnership programs are producing significant environmental results. More than 6,000 partner industries and communities voluntarily prevent pollution and conserve valuable resources while also saving money. Throughout headquarters and regions, partnership programs are providing a cooperative, non-regulatory means for meeting environmental goals.

The Reinvention Action Council (RAC) has recommended, and I concur, that through the day-to-day management of the Office of Reinvention (OR), the Partnership Programs Coordinating Committee (PPCC) will continue coordination among the partnership programs with senior-level support and advice from a subgroup of the RAC. A charter setting out the functions and responsibilities for coordination of the Agency's partnership programs is attached. Specifically, the charter:

- reinforces the Office of Reinvention's responsibility for management of the PPCC;
- establishes a subgroup of the RAC to serve as advisors for the partnership programs;
- requires all Agency partnership programs to be represented on the PPCC;
- requires AAs/RAs with multiple partnership programs to designate a lead representative responsible for insuring coordination and providing necessary information;
- requires new or developing partnership programs to consult with the PPCC and OR prior to program launch; and
- directs PPCC development of evaluation guidance and its use by the programs.

Please review your office's or region's staff participation in the PPCC and designate a representative from each of your programs to the PPCC. In addition, offices and regions with multiple programs shall designate a lead representative to the PPCC. Please submit the names of your representatives to Rebecca Nachtrieb (202/260-7423), the OR partnership programs coordinator, by August 14, 1998.

Attachment

cc: Carol Browner
Deputy Assistant Administrators

Charter for Coordination of EPA's Partnership Programs

PURPOSE

This charter establishes an operating structure for internal coordination and communication related to EPA's partnership programs. Coordination among EPA's partnership programs is conducted by the Partnership Programs Coordinating Committee (PPCC) and the Reinvention Action Council (RAC) Advisors (a subcommittee of the RAC), and is managed by the Office of Reinvention (OR).

EPA's partnership programs work with external partners to demonstrate that voluntary goals and commitments achieve real environmental results in a timely and cost-effective way. Through its array of partnership programs, collectively referred to as *Partners for the Environment*, EPA works cooperatively with industry and others to effect long-term institutional changes. The partnerships result in improved public health and environmental protection and are mutually beneficial by preventing pollution at lower costs.

SCOPE

Role of the PPCC

The Partnership Programs Coordinating Committee (PPCC) will be responsible for coordination, communication, marketing, measurement, identification and evaluation of cross-cutting issues, and development of policy and implementation guidance. The PPCC fosters coordination and internal communication among partnership programs, avoids duplication of efforts and services, improves resource utilization, and promotes common approaches to evaluation and performance measurement. It also provides a means to consolidate the Agency's message and market the programs in a way that reduces confusion about the number, scope and purpose of partnership programs. Specifically, the PPCC will:

- provide up-to-date information on partnership programs and their successes;
- jointly market *Partners for the Environment* programs;
- identify and address cross-cutting policy issues as needed and recommend options to the RAC Advisors;
- review and provide advice to new partnership programs to ensure coordination and consistent external communication; and
- prepare guidance on development, implementation and evaluation of partnership programs.

Role of OR

The Office of Reinvention (OR) will oversee policy on partnership programs and facilitate both policy and coordination issues. Specifically, OR will:

- provide day-to-day management of PPCC functions and maintain a central repository of information on partnership programs;
- coordinate with the PPCC to support new partnership programs;
- serve as the initial Agency contact for general inquiries about partnership programs;
- identify cross-cutting policy issues, assist the PPCC and RAC Advisors in resolution of issues as needed, and involve or inform the RAC and AAs; and
- ensure that evaluations are conducted by the partnership programs and reviewed for improvements in how the Agency does business.

Role of RAC Advisors

The RAC Advisors, a subcommittee of the Reinvention Action Council (RAC), will assist OR and the PPCC by providing senior management advice and guidance on partnership programs policy and coordination issues. The RAC Advisors will:

- be advocates for the partnership approach;
- identify and frame major cross-cutting issues, deciding whether the PPCC, OR, the RAC Advisors or another office will be responsible for analysis and recommendations;
- make decisions or elevate partnership program policy or management issues;
- ensure timely and effective implementation of policy decisions by the partnership programs and the RAC; and
- ensure that the RAC makes resources available to conduct activities to promote and improve partnership programs.

Composition

All partnership programs are required to be represented on the PPCC. Offices/Regions with multiple partnership programs shall designate a lead representative responsible for insuring coordination and providing information. Programs may also be represented on the PPCC by national partnership program directors. The Deputy Associate Administrator for Reinvention Policy is the permanent co-chair of the Partnership Programs Coordinating Committee. Another senior EPA official, such as a Deputy Regional Administrator or a Deputy Assistant Administrator, serves as co-chair on a rotational basis for a two-year term. Co-chairs will provide staff support for the activities related to partnership programs coordination.

The RAC Advisors shall have no more than six members and shall include representation from Regions and Headquarters Offices that support several partnership programs. The Deputy Associate Administrator for Reinvention Policy will be a permanent member of the RAC Advisors; all other members will serve for a term of two years and may be reappointed by the Associate Administrator for Reinvention.

MEETINGS

The PPCC shall meet monthly to conduct its business. Work groups and subcommittees of the PPCC shall meet as needed. The Co-Chairs or their designee shall attend the PPCC monthly

meetings and shall meet with PPCC members and subcommittees as needed. The RAC Advisors shall convene as necessary upon the request of the Co-Chairs, the PPCC and/or OR.

DURATION

Coordination of EPA's partnership programs will be needed on a continuing basis as determined by the Administrator or Deputy Administrator. This charter shall be reviewed five years after approval.

Fred Hansen, Deputy Administrator /s/
Date

8/10/98

APPENDIX C

Guidance from the Office of General Council

Partnership programs, though not legislated, must still follow the laws, rules, and codes of conduct that guide how federal programs are administered. A representative from the General Council's office sits on the Partnership Program Coordinating Committee and assists with advice on the processes used to implement programs. The following guidelines are meant to raise your awareness of particular areas that pertain to partnership programs. Please consult with Jim Drummond of OGC (drummond.james@EPA.gov) if you would like more details on the information presented below.

Legal Authority to Undertake the Program

EPA has broad authority to cooperate with the private sector to protect the environment. However, there are limits, particularly when financial arrangements with private parties are involved, that you may need to keep in mind. Some of these limitations are governed by the Federal Advisory Committee Act (FACA; P.L. 92-463). Others are driven by the rules that govern ethics or can be found within Agency policy.

Considering the Federal Advisory Committee Act (FACA)

FACA rules apply to specific situations when we establish a group of stakeholders to advise the Agency on how we get our work done. The Science Advisory Board is perhaps the best known of the FACA committees in the Agency. As partnership programs engage the public during the life of the program, certain precautions may be necessary to comply with the rules of FACA. For example, you may ask your stakeholders for individual input on what is important to them, but you cannot establish a group and ask for a group opinion on what EPA should do or what kinds of policies EPA should implement to respond to their needs. There are often FACA concerns when dealing with outside parties for advice. If you have any doubt about the approach you are taking, contact OGC for expert advice.

Legal Limitations or Restraints On Budget

Recognition and Awards

You must be mindful of the legal limits on the use of appropriated funds for awards and award ceremonies and agency policies encouraging prudent stewardship. At the time of this writing, the Pollution Prevention Act provides the broadest authority under which the Agency gives awards and recognition to companies. Delegation of Authority 1200 TN-489: 1-111. Awards for Source Reduction Programs under the Pollution Prevention Act

(<http://intranet.epa.gov/rmpolicy/ads/dm/masterto.htm>) is your reference to what is allowed under the Pollution Prevention Act and the recommendation for expenditures on awards.

In addition to this Agency guidance, it is recommended that costs related to ceremonies are held to a reasonable level and that prudent stewardship of public funds is practiced.

Financial Arrangements with Partners

Be aware of legal limitations on the Agency's ability to accept donations of funds, goods and services from outside parties. EPA cannot improperly "augment" its appropriations through contributions from partners. There may be occasions, however, where a partnering company may wish to sponsor a reception prior to an awards ceremony. This is possible under certain circumstance. Check with OGC for clarification.

Use of Grants and Cooperative Agreements

Many partnership programs use grants or cooperative agreements to seed the goals they are working to promote. Take care to ensure that any financial arrangements with partners are proper legally and are conducted in an arms length, business like manner. For example, when EPA enters into cooperative agreements to provide financial assistance to its partners, the Agency must comply with the Federal Grants and Cooperative Agreement Act.

The Agency can collaborate with a recipient in carrying out the funded project. However, cooperative agreements cannot be used to obtain services for the direct use or benefit the Agency.

Partner Agreements

Some of the Agency's most effective partnership programs enter into Memoranda of Agreement with their partners to structure and memorialize the cooperative nature of the venture. These agreements are not legally required. However, they can be an effective means of ensuring that the Agency is not vulnerable to a future claim for compensation that may violate the "voluntary services" provision of the Anti-Deficiency Act.

Promoting Partnerships

Marketing efforts must not run afoul of the "publicity and propaganda" restriction that applies to the use of appropriated funds. In addition to applying to "grass roots" lobbying on pending legislation, this restriction applies to "self aggrandizement" or "puffery" which promotes the Agency. It does not apply to informational activities intended to inform the public about Agency partnership programs.

APPENDIX D

Bibliography and Resources

Aiming for Excellence

EPA Document 100-R-99-006

Online. Available. <http://www.epa.gov/reinvent/taskforce/report99/>

Better Decisions Through Consultation and Collaboration

To be published in the first quarter of 2000

<http://www.epa.gov/stakeholders>

Boosting Your Bottom Line (a marketing brochure for Partners for the Environment)

EPA Document 100-R-00-001

Call 202/260-6135 to request a copy

Catalogue of the Agency's Partnership Programs

EPA Document 100-B-07-003

Online. Available. <http://www.epa.gov/partners/resources.html>

Characterization of Selected EPA Partnership Programs

Final Report, May 20, 1999

Call 202-260-6135 to request a copy.

Compliance Screening for EPA Partnership Programs

April 5, 1999

Online. Available. <http://www.epa.gov/partners/resources.html>

Constructive Engagement Resource Guide: Practical Advice for Dialogue Among Facilities, Workers, Communities and Regulators

EPA Document 745-B-00-008

Taking Stock of the Future: A Management Review of Partnership Programs at EPA

August 31, 1999

Call 202-260-6135 to request a copy.

Using Incentives in EPA Programs

March 2000

Call 202-260-6135 to request a copy.

Project XL Stakeholder Involvement: A Guide for Project Sponsors and Stakeholders

EPA Document 100-F-99-001

Online. Available. http://www.epa.gov/projectxl/xlimpr_b.htm

APPENDIX E

Partners for the Environment: Participating Programs

Adopt Your Watershed

Encourages and facilitates citizen involvement in local watershed protection activities.

202-260-1956 (800-832-7828) www.epa.gov/adopt

AgStar

Promotes cost-effective methods for reducing methane emissions at dairy and swine operations through improved manure management. 202-564-9041. 800-95AGSTAR (800- 952-4782)

www.epa.gov/agstar

Climate Wise

Reduces industrial greenhouse gas emissions and energy costs through comprehensive pollution prevention and energy efficiency programs. 202-260-4407. 800-459-WISE

www.epa.gov/climatewise

Coalbed Methane Outreach

Encourages profitable recovery and use of methane liberated from coal mines by helping identify viable technologies, markets and finance sources. 202-564-9468. www.epa.gov/coalbed

Consumer Labeling Initiative

Makes health, safety, and environmental information on household product labels easier for people to find, read, understand and use, and encourages people to "Read the Label *First!*" before buying using, or disposing of products. 202-260-7768. www.epa.gov/oppintr/labeling

Design for the Environment

Helps business incorporate environmental considerations into the design of products, processes, and technical management systems. 202-260-1678. www.epa.gov/dfe

Energy Star

Maximizes energy efficiency in commercial, industrial, and residential settings by promoting new building and product design and practices. 888-STAR-YES (782-7937).

www.epa.gov/energystar

Environmental Accounting

Increases business understanding of environmental costs and incorporation of these costs into routine operations. 202-260-3844. www.epa.gov/oppintr/acctr

Environmental Technology Verification

Accelerates the entrance of new environmental technologies into the marketplace by verifying the performance of innovative technologies to problems that threaten human health or the environment. 202-564-3212. www.epa.gov/etv

Green Chemistry

Promotes the design of chemical products and processes that reduce or eliminate the use and generation of hazardous substances. 202-260-3960. www.epa.gov/dfe/greenchem

Indoor Air Quality

Promotes simple, low-cost methods for reducing indoor air quality risks. 202-564-9733. www.epa.gov/iaq

Landfill Methane Outreach Program

Reduces methane emissions from landfills by installing products to capture gases and produce electricity, steam, or boiler fuel. 202-564- 9797 www.epa.gov/lmop

Natural Gas STAR

Encourages natural gas industry to reduce leaks through cost-effective best management practices. 202- 564-9736 www.epa.gov/gasstar

Pesticide Environmental Stewardship Program

Promotes integrated pest management and reduces pesticide risk in agricultural and nonagricultural settings. 800- 972 -7717. www.pesp.org

Ruminant Livestock Efficiency

Reduces methane emissions from ruminant livestock operations. 202-564-9043. www.epa.gov/rlep

State and Local Outreach

Reduces greenhouse gas emissions from states and local communities by empowering officials with information and technical assistance. 202- 260-4314 www.epa.gov/globalwarming

Voluntary Aluminum Industrial Partnership

Reduces perfluorocarbon gas emissions from aluminum smelting. 202-564-9044. www.epa.gov/vaip

Waste Minimization National Plan

Reduces persistent, bioaccumulative, and toxic chemicals in hazardous waste. 703-308-8489 www.epa.gov/wastemin

WasteWise

Reduces business and solid waste through prevention, reuse and recycling. 703-308-8755 (800-EPA-WISE) www.epa.gov/wastewise

WAVE (Water Alliances for Voluntary Efficiency)

Promotes water efficiency in hotels, schools, universities and office buildings. 202-260-7288. www.epa.gov/owm/genwave