

Testing New Tools to Reduce SNC: Evidence Based Path Forward Proposal

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Steps

1. Define a SNC problem that your state or region wants to remedy.

2. Identify a new tool that might be effective.

3. Let OECA know of your preliminary interest by February 17th.

4. OECA will review to see if any “commonalities”. If yes: facilitate a preliminary scoping discussion with interested states and regions.

5. If scoping positive, OECA will try to facilitate design and implementation with academic researcher and/or OECA contract support.

1. SNC Problem Definition

- State or region defines a problem.
- Also include any ideas you may have on the causes of the problem and readily available data on the problem.
- Problems we have heard:
 - Small POTWs in SNC
 - Facilities with existing violation patterns that suggest they might become SNC in next few months.
 - Facilities that failed to submit their DMRs.
 - Other?

2. New Tool Identification

- Is there a new tool that might be helpful in addressing the problem?
- “New” might be:
 - Tool that another state/region is using
 - Tool you use, but could be modified to improve.
 - Tool in another program that might be relevant .
- Examples of tools that were discussed this week:
 1. Peer mentoring by *compliance stars* with SNC facilities.
 2. Electronic peer comparisons of discharge performance.
 3. Electronic notices for late DMRs, or self-reported violations.
 4. Expedited settlement agreements.
 5. Connecting small POTWs to onsite technical assistance
 6. Informing small POTWs about possible financial or technical assistance.
 7. Inspectors providing compliance assistance notices
 8. Data analytic or machine learning ways to identify SNC early.

3. Submit your problem/tool idea to OECA

- This is preliminary expression of interest by region or state.
 - Your only commitment is to participate in a follow-up conference call to scope out.
 - You have not bound your region or state to implementation.
- Submit using template, no more than two pages, by Feb 17.

4. OECA Will Compile to see if any commonalities (at least 3 entities)

- To test if a new tool is effective, best to pilot with at least 3 states or regions.
- If we have common interest, then OECA will set up conference call to scope.
- OECA prior to conference call may:
 - Outline the theory of change (logic model) for why the new tool would remedy the specific problem or not.
 - Partial review as to behavioral science theory and empirical evidence for use of the tool.
 - Identify baseline data on the problem that already exists or could easily be collected.

5. If positive scoping call, proceed to design

- Pull in researchers to design implementation so that we can learn if effective:
 - Phase in new tool randomly over a year or two.
 - Gold standard randomized control test.
 - Time series (before/after) with pseudo control group.
 - Other impact evaluation methods may be appropriate.
- Explore if OECA contract resources and/or university resources are available to support finishing design and then implementation and evidence evaluation.
- As design becomes clear, check back to confirm regional state commitment to implement with evaluation built in.

Could we try this?

- Evidence based government approach has great potential to improve our programs.
- We could learn and expand our compliance assurance tool box.
- If we are creative, not all new tools tried will prove to be practical or effective.
 - That's okay!
- States could talk among themselves and submit common proposal by February 17 or submit individually.
- Comments?