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October 14, 2015

SUBJECT: Comments on U.S. EPA's Office of Civil Rights "FY 2015-2020 External Compliance and Complaints Draft Strategic Plan"

Submitted via [civilrights@epa.gov](mailto:civilrights@epa.gov)

The Environmental Council of the States (ECOS) is the national non-profit, non-partisan association of state and territorial environmental agency leaders. The ECOS Planning Committee appreciates the opportunity to review the U.S. Environmental Protection Agency's (EPA) Office of Civil Rights "FY 2015-2020 External Compliance and Complaints Draft Strategic Plan" and offers the following comments:

- In general, the draft plan looks like it will provide OCR a useful path to initiate improvements in processes and transparency.
- ECOS recommends OCR utilize business process improvement techniques such as lean as it looks to develop standard operating procedures for their case resolution process (i.e. Goal 1 Benchmark 1). Streamlining techniques can assist in eliminating any non-value added steps in the process prior to standardizing it.
- ECOS suggests OCR utilize a more frequent review (especially of the implementation steps) than annually (as mentioned in the Introduction). A more frequent review cycle would allow for mid-cycle adjustments without losing momentum toward the goal. This may be of particular importance leading up to a change in administration. ECOS further suggests engaging with states as much as practicable and at least annually in regards to review of the relevant strategic plan benchmark and goals.
- ECOS suggests that OCR seek to ensure that the independent development plans created for the staff (p.6) are aligned with, and incorporate aspects of, the goals and implementation steps, to increase the probability of achievement of the goals.
- In the spirit of state-EPA worksharing, ECOS encourages EPA to provide states access as appropriate to training projected to be developed under this plan.

Again, thank you for the opportunity to provide input on this draft plan. States look forward to continuing to work collaboratively with OCR to protect human health and the environment in a way that fully complies with Title VI of the Civil Rights Act.

Sincerely,

William A. Ehm  
ECOS Planning Committee Chair  
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