



Agency Priority Goal Action Plan

Accelerate Permit-Related Decisions

Goal Leader:

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Overview

Goal Statement

- **Improve the efficiency and effectiveness of federal environmental permitting programs.** By September 30, 2019, EPA will reduce by 50% the number of permitting-related decisions¹ that exceed six months

Challenge

- EPA permitting programs are complex, specialized, and administered across many offices. EPA lacks basic system-wide tracking and overview capabilities on permit status, backlog, throughput, and performance trends. Inefficient procedures, incompatible data systems, and inadequate coordination and communication complicate efforts to explore opportunities to modernize and streamline while maintaining day-to-day operations

Opportunity

- Robust, targeted improvements in permitting processes can improve environmental outcomes, accelerate economic growth, and save time and resources overall by reducing delay, wasted effort, and avoidable disputes

¹Issuance or denial of a permit

Goal Structure & Strategies

Building on experience in EPA and examples from state environmental agencies, EPA will improve the efficiency and effectiveness of its permitting programs in several ways, and will explore additional opportunities to improve federal environmental permitting overall.

- **Strategy 1 - Leaning Permitting Programs** - by conducting targeted Lean business process improvement events and implementing their results
- **Strategy 2 - Tracking and Targeting Improvements** - by gathering, analyzing and using agency-wide permitting data to track results, identify any incompatible data systems and take corrective action if necessary, collect best practices, and target efforts
- **Strategy 3 - Improving Guidelines and Procedures** - by systematically reviewing and, as appropriate, developing new policies, approaches and procedures to eliminate unnecessary steps and improve efficiency of the permit issuance process

Goal Structure & Strategies

- EPA has deployed a new EPA Lean Management System (ELMS) to achieve the results set forth in the Strategic Plan. As part of ELMS, EPA is continuing to conduct multi-day process improvement events to make significant progress in specific priority areas, which include permitting, identified in the Strategic Plan.
- Visual management will then be used to ensure that improvements from the events are achieved and sustained over time. Poster boards with regularly updated performance data will serve as visual management for monitoring progress towards meeting the targets set forth in the Strategic Plan, while additional poster boards will be used to track the flow of the work that needs to be performed to achieve the targets. Managers and staff will have weekly stand-up huddle meetings in front of their visual management boards to discuss the performance and flow of the process.
- In addition, National Programs and Regional Offices are holding monthly business reviews to go over both the strategic measures tracked on scorecards, and the implementation plans that track progress on Strategic Plan and priority area projects identified for EPA under President Trump's Executive Order on a Comprehensive Plan for Reorganizing the Executive Branch. The Administrator will continue to hold quarterly reviews to monitor overall progress on the agency's Strategic Plan and priority area projects.
- ELMS is designed to make sure that EPA is regularly monitoring progress towards meeting the targets set forth in the Strategic Plan, and taking immediate action if expected performance is off track.

Summary of Progress – F18 Q3

Building on experience in EPA and examples from state environmental agencies, EPA will improve the efficiency and effectiveness of its permitting programs in several ways, and will explore additional opportunities to improve federal environmental permitting overall.

Strategy 1: Leaning Permitting Programs

- (Underway) Programs are implementing recommendations to improve processes identified during Lean events conducted for UIC, NPDES, Title V and NSR programs

Strategy 2: Tracking and Targeting Improvements

- (Underway) Tracking and reporting the number of pending decisions for new permits that are > 180 days old
- Developing a comprehensive tool to serve as a repository for and track the status of pending decisions for new permit applications

Strategy 3: Improving Guidelines and Procedures

- Developed an approach for applicants that refuse or are unable to provide information necessary for EPA to process an application. This approach could result in permit denial.
- Reviewing current permitting policies to identify any that impact permit timeliness ⁵

Key Milestone: Lean Events

- Work with programs to implement solutions identified during Lean events to improve permit timeliness.
- Initial round of Lean events held in January – April 2018

Milestone Summary					
Key Milestones	Milestone Due Date	Milestone status	Change from last month	Owner	Comments
Conducted Lean events for UIC and NPDES permitting programs	Jan 2018	Completed	Strategy launched	OW	Identify and prioritize potential improvements resulting from Lean events.
Conducted Lean events for Title V and NSR permitting programs	Mar – Apr 2018	Completed	Strategy launched	OAR	Identify and prioritize potential improvements resulting from Lean events.
Work with OW to help implement solutions identified during Lean events to help improve permit timeliness	FY 18	Ongoing	Ongoing	OW, OA, OP	OW is identifying categories of key delays in UIC permitting and develop strategies to address them. OW is updating the current NPDES permit application forms, originally developed in the 1980s, to improve the instructions and clarity for users.
Work with OAR to help implement solutions identified during Lean events to help improve permit timeliness	FY 18	Ongoing	Ongoing	OAR, OA, OP	To encourage national consistency in permits and other materials (statement of basis, public notice announcements), OAR will create templates and examples of commonly used materials for Regions to use. OAR is developing an SOP to help permit writers confirm whether permit applicants have paid required fees associated with permit applications.

Key Milestone: System-wide Data

- Collect system-wide data on permit status, backlog, and throughput
- Developing new tool to track pending applications for new permits

Milestone Summary					
Key Milestones	Milestone Due Date	Milestone status	Change from last month	Owner	Comments
Initial data collected for scoping purposes and to identify initial Lean / Kaizen events.	December 2017	completed	No change	OP	Data used during Lean permitting events as a baseline to evaluate overall permit processing time.
Clarification of data collection requirements and definitions for programs & regions to ensure accurate calculations for monthly permit data collection.	June 2018	New	N/A	OA	
Permit Tracker – Developing an online tool to track the status of and key information for all applications pending with EPA for new permits.	July 2018	New	N/A	OA	

Key Milestone: Improved Internal Procedures

- EPA is in the process of reviewing permitting policies to identify any that may be impacting timeliness
- Developed an approach for applicants that refuse or are unable to provide information necessary for EPA to process applications. This approach could result in permit denial.

Milestone Summary					
Key Milestones	Milestone Due Date	Milestone status	Change from last month	Owner	Comments
Conducted initial effort to gather and review permitting policies available online.		April 2018 completed		OP	
Evaluating policies identified that may be impacting timeliness and proposing possible solutions / recommendations.	Sept 30, 2018	Ongoing		OP	
Developed approach that provides a process for Regions to provide clear notification and, if necessary, deny a new permit application based on incompleteness.	July 2018	New	N/A	OA	

Key Indicators

- The following indicator will be used to show progress toward the goal of reducing by 50% the number of permitting-related decisions that exceed 6 months:
 - Pending applications for new permits that are over 180 days old
 - The baseline is 200, which is the number of backlogged permits calculated in June 2018
- Data will be collected monthly starting in June 2018 and summarized quarterly starting in the 4th quarter (August 2018)

Data Accuracy and Reliability

- Purpose of Measure
 - To inform on EPA's commitment to provide consistency and certainty to the regulated community in executing its responsibilities
- Unit of Measure
 - Permits
- Methodology
 - This measure applies only to applications for new permits; it does not apply to renewals or modifications
 - The number of applications for new permits that are over 180 days old are being tracked and reported each month
 - The accuracy of the data is checked each month through the ELMS reporting (bowling chart)
- Performance Measure Term Definitions
 - A **permit-related decision** is measured from the date a permitting application is received by the respective regional permitting office to the date on which the permit either becomes effective or is denied
 - A **pending permit-related decision** refers to a decision to approve or disapprove a permit application that has not yet been made

Contributing Programs

Organizations and Program Activities:

- U.S. EPA
 - Office of the Administrator
 - Data collection, review of existing policies and development of new policies, as needed; facilitation of Lean events and follow-up; collect mission measure data related to permitting
 - Program Offices (Office of Air and Radiation, Office of Land and Emergency Management, Office of Water, Office of Chemical Safety and Pollution Prevention) and Regional Offices:
 - Participation in Lean events and implement recommended solutions; Report permitting data; and potential policy changes
 - Office of Chief Financial Officer – E-Enterprise federal/state program
- State/Local Permitting Agencies – can provide recommendations/examples on permit program operation and improvement
- Regulated Entities – permit holders will benefit from programs that are more efficient and effective
- Tribes, Local Communities and Individuals – will experience enhanced environmental protection and improved transparency