

Jackie Meyle  
Dr. Imperial  
PLS 506  
June 7, 2016

## Program Evaluation Critique

The evaluation being critiqued assesses the effectiveness of the Drinking Water and Clean Water Infrastructure Tribal Set-Aside Grant Program. The Environmental Protection Agency (EPA) Clean Water Indian Set-Aside Grant Program and Drinking Water Infrastructure Grant Tribal Set-Aside Program provide funding for wastewater infrastructure and drinking water infrastructure to American Indian tribes and Alaska Native Villages (EPA, 2011). The purpose of the evaluation was to determine the effectiveness of providing access to safe drinking water and sanitary facilities in Indian country and in compliance with the Safe Drinking Water Act in Indian country. The evaluation also hoped to understand how the programs were being implemented, how the implementation influences the program's performance, if it helps reach their goals, and if the strategic measures are accurate indicators of the program's progress. The evaluation also hoped to better understand the EPA's scope of influence and to better understand if and how the EPA could better demonstrate program results. The audiences for the program evaluation were the EPA managers and staff who implement and oversee the two programs from the Office of Ground Water and Drinking Water, Office of Wastewater Management, and EPA regions. The evaluation also thought the United States Department of Health and Human Services, Indian Health Service managers and staff would be interested in the results as well as American Indian tribe and Alaska Native representatives who are eligible for funding from the two programs.

The logic model established a goal for the EPA Clean Water Indian Set-Aside Grant Program and Drinking Water Infrastructure Grant Tribal Set-Aside Program. This goal was "to improve access to drinking water and basic sanitation in Indian country and to improve compliance of community water systems with applicable health-based standards" (EPA, 2011). The logic model that had been previously designed by the EPA was updated during the evaluation's approach. The program evaluation used a mix-method approach. It collected information from document reviews, interviews with stakeholders, and new data collection and synthesis. For the evaluation's methodology, the team worked with EPA headquarters and regional coordinators in order to review the project data and fill in gaps that arose. The team conducted a series of iterative data analyses and analyses of project performance information. A regression analysis was considered, with the dependent variable being the Community Deficiency Profile deficiency level in a set of community homes. The independent variables included EPA region, Indian Health Service area, project duration, project funding, available compliance information, and other factors that might influence a community's access deficiency designation (EPA, 2011). However, the correlation analyses conducted showed a lack of evidence to suggest a more sophisticated regression analysis would provide meaningful results (EPA, 2011). The evaluation linked the EPA Drinking Water Infrastructure Grant Tribal Set-Aside project information to the detailed Safe Drinking Water Act violation data. The evaluation team also conducted multiple data analyses, including statistical correlations and analyses of project performance information.

The conclusion of the evaluation was that the goals and priorities of the EPA Clean Water Indian Set-Aside Grant Program and Drinking Water Infrastructure Grant Tribal Set-Aside Program could be more clear and focused. EPA staff had different meanings for the term “goal” for the programs and how the program priorities of compliance and access relate to one another. Another conclusion was funding allocation for both programs could be improved to be more in line with the EPA’s priorities. The evaluation also found that for both programs, the project selection could have been more clear and consistent with the EPA’s priorities, while maintaining regional discretion and flexibility. It also found that communication within the EPA and between the EPA and Indian Health Service was inconsistent and not ideal for strategic program management or strategic learning and improvement. Another conclusion was that the Indian Health Service was a vital partner for the EPA to implement the two programs. The evaluation also found that there were opportunities for better communication with tribes about both programs. The EPA also limited ability to make progress on the strategic measures focused on providing access to drinking water and clean water to tribal homes. The evaluation also found that the EPA appeared to be limited in its ability to make progress toward the compliance strategic measure, although the extent of the limitations was not clear due to lack of measureable data. The last conclusion was that the EPA’s meaningful contributions to meeting tribal infrastructure needs were not well reflected by the program’s reported performance.

Some limitations of the evaluation were that some of the available data had gaps, which meant that assumptions were made in order to proceed with data analyses. For some projects, funds that were awarded to a tribe were not provided, which created more assumptions. The evaluation had many strengths, one was that it addressed the limitations within the evaluation. Another strength was that the evaluation gave abundant information about the history and funding of both programs. A third strength was that the evaluation was very thorough in their research. The evaluation looked at multiple documents, interviewed 39 staff members, and collected data from various sources such as historic data from both programs, Safe Drinking Water Information System compliance data, and Indian Health Service STARS data. The outline of the methods made it easy to understand what the evaluation did in order to assess the programs. The evaluation interviewed multiple people from different areas. This allowed the evaluation to have more insight into how effective the program is and how it is implemented. The evaluation also had many weaknesses. One weakness was that the logic model was not explained or provided in the report. The logic model was put in the appendices, which was not provided in the report. The evaluation should have explained the logic model and should have provided a graphic of the model for readers to understand the program’s structure. Another weakness was that the evaluation encountered many gaps, which resulted in the evaluation making many assumptions. The evaluation also did not contain ongoing violations that had occurred prior to 2004. This meant that the data might have missed some information that was relevant to systems provided funding under the Drinking Water Infrastructure Grant Tribal Set-Aside program. It also did not have information on pre-2004 compliance history for systems funded by the EPA or more recent compliance information.

## Bibliography

"Evaluation of the Drinking Water and Clean Water Infrastructure Tribal Set- Aside Grant Programs." United States Environmental Protection Agency. N.p., Mar. 2011. Web. 8 June 2016.  
<<http://nepis.epa.gov/Exe/ZyPDF.cgi/P100BLIF.PDF?Dockey=P100BLIF.PDF>>.