

## 2009 OPERATOR CERTIFICATION PROGRAM EXTERNAL REVIEW

### Background

One of the requirements the Environmental Protection Agency (EPA) established in the *Final Guidelines for the Certification and Recertification of the Operators of Community and Nontransient Noncommunity Public Water System* was the requirement to conduct an “external” review of the Operator Certification Program on a regular basis. In subsequent guidance, EPA listed the following elements of the program that might be included in an “external review”:

- Budget
- Compliance Rate Determination
- Database Management
- Enforcement
- Examination Reviews
- Outreach
- Regulations
- Renewals
- Stakeholder Involvement
- Staffing
- Strategic Planning
- Status of Certified Operators and Trends
- Training and Testing

EPA recommends that this review be completed once every five years. This program review has to be completed by “an entity outside the state operator certification program primacy agency”. Eligible entities that meet this definition include (1) program staff from another state, (2) EPA, (3) an outside contractor or (4) an advisory or stakeholder group convened for this purpose. Having explored all four options, Department of Environmental Protection (DEP) program staff is recommending that the Certification Program Advisory Committee (CPAC) complete this review. If CPAC chooses to not complete the external review themselves the other preferred option is to release a request for proposals for an outside contractor to complete the review. Whichever option CPAC chooses, this committee can be instrumental in designing the final scope of work for the completion of the external review.

### The Final Report

In an effort to design the external review, some thought needs to be put into how the final report will be used and its format. At a minimum, the external review should assess how well the program is working, the extent to which the program is being implemented as designed, and whether the program is accessible and acceptable to its stakeholders. The State Board for Certification of Water and Wastewater System Operators (Board) and DEP will consider whether the existing Operator Certification Program policies and procedures

should be continued, modified, or discontinued based upon the results of the external review.

The final report can take many forms. At a minimum, the report can be a compilation of the results of the external review. The review could go a step further and develop a series of recommendations based on these results. These recommendations could then be prioritized and a recommended strategic plan for the Board and DEP, complete with milestones and a timeline, developed. Attachment A is a generic outline for research reports such as this that could be modified as needed.

## **Study Design**

The recommended methodology for the completion of the external review is to complete a formative evaluation of the program. Formative evaluations are conducted during the ongoing implementation of a program with the intent to improve the program. A formative evaluation assesses the extent to which a program or process is operating as intended and identifies opportunities for streamlining or otherwise improving it. Formative evaluations often begin with an analysis of how a program currently operates. Formative evaluations may also assess the extent to which program activities conform to statutory and regulatory requirements, agency policies, program design or customer expectations. To complete the design of this evaluation, the following steps are recommended:

- Determine which program components will be reviewed; all or just some.
- Identify the target audience for each program component to be reviewed.
- Identify the information needed to complete the review and who can provide that information.
- Identify any data gaps.
- Identify the mechanisms for collecting needed data. These mechanisms can include a literature review, surveys, the convening of focus groups and/or the scheduling of workshops and public meetings. Attachment B is a draft survey that could be used as one tool to collect the needed data.

The results of the formative evaluation should include both “quantitative” and “qualitative” data, along with a final assessment of the data. For example, a “quantitative” analysis of survey data using close-ended questions could consist of tabulating the information and performing various statistical analyses of the data. A “qualitative analysis” could be done by a focus group by taking survey results and organizing comments into similar categories to attempt to identify patterns, or associations and causal relationships in relation to the themes of the questions.