

USEPA/OECA/OC
State and Tribal Assistance Grant (STAG) 2000-2001
Michigan: Business Needs Assessment and Measurement of Work Product Effectiveness
Proposal
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State of Michigan
Final Project Proposal
for
Enforcement and Compliance Assurance Assistance
Grant/Cooperative Agreement Funding

(Revised December 19, 2001)

I. PROJECT INFORMATION

1. State of Michigan
Department of Environmental Quality
Environmental Assistance Division
(Small Business) Clean Air Assistance Program
2. Title of Project: "Business Needs Assessment and Measurement of Work Product Effectiveness."
3. Focus Area (from Notice of Availability): Compliance Assistance Outcome Measurement
4. Total Funds Requested from EPA: \$100,000

Total Funds Allocated by EPA: \$40,000
5. Total Project Cost (revised budget includes state in-kind contributions): **\$49,802.**
6. Contact Persons:

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7. Preferred Assistance Agreement: Grant funding requested.

II. SUMMARY

1. Summary of the Problem Being Addressed:

Historically, the relationship between the regulator and the regulated has often been contentious. While business and industry are sometimes hesitant to step forward and request assistance with environmental, health, and safety issues, regulators have inadvertently contributed to this hesitancy by not fully satisfying business' need for a comprehensive and consolidated delivery of regulatory assistance for their facilities. For the most part, technical assistance and outreach have been approached from a traditional perspective where one program or topic is targeted for fact sheet development and distribution, industry-specific conferences or meetings, site visits and phone consultations. Although these traditional methods of information dissemination, education, and outreach have proven to be effective ways to reach what are believed to be the most active and interested of Michigan's businesses (e.g. those who would ordinarily comply with the air quality requirements), there remains a vast and diverse constituency of businesses, especially small and medium-sized businesses, that have not been active in pursuing their obligations of compliance with federal and state environmental statutes and regulations.

The traditional approach to compliance assistance and outreach has become limited in its scope of application. Many activities performed by industry (i.e. storage and handling of hazardous waste) are regulated not by one agency, but by numerous federal, state and local regulatory programs (i.e. the Environmental Protection Agency (EPA), United States Department of Transportation, multiple divisions within the Michigan Department of Environmental Quality, the Michigan Department of Consumer and Industry Services, Bureau of Safety and Regulations, local fire departments, etc.). In an effort to consolidate and mend this strained regulatory relationship, environmental, health, and safety regulators have been creating greater opportunities for business and industry to learn about the compliance requirements through a commitment to and expansion of jointly-sponsored outreach activities by regulatory agencies. A successful and growing trend among the Small Business Technical and Ombudsman (SBTO) programs seems to be toward a multi-media approach that provides a variety of information on the multitude of requirements under broad topics of environmental, safety, and health compliance. This method of information delivery seems to provide businesses with the greatest amount of relevant compliance information, and it is being accomplished in a single delivery attempt (i.e. materials presented at conferences, workshops, panel forums, on-site visits, etc.).

2. Summary of the Project's Goals

The following grant project is designed to:

- Query the compliance needs of statewide small and medium-sized businesses;
- Measure the effectiveness of the current level of technical assistance provided by focusing on the effectiveness of one type of program product (a multi-media guidebook) and one type of outreach effort (a compliance assistance workshop for this particular guidebook); and
- Better promote the state's SBTO program's services within the business community.

3. Summary of the Project's Components

In the spring of 2000, the Michigan Department of Environmental Quality (MDEQ) developed its fourth industry-specific technical assistance guidebook that explains in “plain-English” how to comply with the multitude of state and federal environmental, health, and safety regulations that are faced in the workplace. The guidebook, entitled the *Michigan Manufacturers’ Guide to Environmental and Safety and Health Regulations*, was recently presented at a series of statewide workshops to over 600 environmental, safety, and health professionals. Never had such a comprehensive and joint effort been made, by a multitude of state agencies, to address the general environmental, safety, and health needs of the state’s manufacturing industry. This grant project proposes to measure how this jointly developed guidebook product and workshop delivery system has increased awareness and improved the compliance rates of those who attended or received the *Michigan Manufacturers’ Guide to Environmental and Safety and Health Regulations*. The guidebook is currently available at: www.deq.state.mi.us/ead/pub/caap/manufguide.

The grant project will conduct a client assessment of the effectiveness of the SBTO programs through assessment of the product and delivery system for the *Michigan Manufacturers’ Guide to Environmental and Safety and Health Regulations*. The client base will consist of the environmental, safety, and health professionals who either attended one of the spring statewide guidebook workshops and who received a copy of the *Michigan Manufacturers’ Guide to Environmental and Safety and Health Regulations*, or who purchased the guidebook without attending the workshop.

The client assessments will be structured to identify what factors, barriers, and needs exist in the small- and medium-sized business community that inhibit and prevent the use or delivery of products and services from the state’s SBTO programs. The client assessments will be accomplished by survey or through focus groups, and if resources allow, a limited combination of both may be implemented. Client assessments conducted by survey will evaluate the impact and effectiveness of the *Michigan Manufacturers’ Guide to Environmental and Safety and Health Regulations* guidebook on the compliance rate of statewide businesses, and the introduction to and usefulness of distributing such guidebooks via statewide workshops. The results of this survey will include recommendations for continuance or modification of the program’s current promotional strategies, work products and outreach efforts. Client assessments may also be accomplished through focus groups forums in an effort to provide an explanation as to the compliance actions or lack of action from the business community that resulted from use of the guidebook.

4. Summary of How the Project’s Components Will Address the Problem and Attain the Goals

Once a program is delivered or products have been created, it is important to measure what impact these activities are making on the regulated community. By measuring the impact of the *Michigan Manufacturers’ Guide to Environmental and Safety and Health Regulations*, we hope to determine answers to the following questions:

- Was the information presented in an easy-to-read layout and understandable format?
- Was the information relayed in “plain-English” so that the compliance requirements were easier to understand and meet?
- Was the manner (the workshops) in which the information was presented conducive to achieving compliance?

- What portions of the book provided you with the most useful information?
- Did you learn anything new from what was presented at either the workshops or through your experience with reading the book?
- What areas of your facility saw an improvement in their compliance rate?
- What is the best way for you to receive compliance assistance information?
- How can the SBTO programs better serve the needs of your facility?
- What are your most important compliance issues?
- What environmental; safety; or health-related areas do you need the most help with, and what types of programs or products would you like to see the SBTO programs provide?

These type of survey and/or focus group responses will provide the SBTO programs with the following:

- A list of problem factors which prevent small- and medium-sized businesses from seeking or receiving environmental assistance from the state;
- An inventory of what environmental, safety, and health information is most needed by small- and medium-sized firms;
- A summation of what format, manner, or media is best for the transfer and use of environmental, health, and safety information to small- and medium-sized firms;
- Recommendations on the best way to provide direct and supportive strategies that will help the programs reach new businesses in an effort to increase their usage of the programs; and
- Identification of improvements and changes to be included in the next edition of *Michigan Manufacturers' Guide to Environmental and Safety and Health Regulations*.

III. WORK PLAN

1. Proposed Activities

Project evaluation and analysis will be completed by a contractual consultant specializing in research and statistical methodology, and who has knowledge of Michigan's small- and medium-sized business community. The contractual consultant will work with the SBTO programs to determine how much of the project's components and scope can be accomplished, given the amount of grant funding available and the goals and outcomes of the project. Once the project's scope has been identified, the contractual consultant, working with the SBTO programs, will collect guidebook customer information, and use this information to construct questions for the survey instrument and/or focus group forums.

2. Measures

The purpose of the survey or focus group forums is to measure the overall effectiveness, layout, format, content, and delivery mechanism for the *Michigan Manufacturers' Guide to Environmental and Safety and Health Regulations*. The survey or focus groups will assess some of the motivational factors affecting environmental, safety, and health compliance by examining the attitudes and perceptions of small- and medium-sized businesses toward state and federal compliance issues. The survey or focus groups will also query participants' knowledge about the types of environmental, safety, and health products/services that are available at the local, state, and federal level, whether or not they have used any of these

products/services and why these products/services were used/not used. This information will be used to help explain the motivation behind businesses use or lack of use of not only the guidebook, but other state, federal, and local resources, as well.

Individual survey or focus group responses and participants' identification are to remain confidential and will not be revealed to any state regulatory agency for follow-up contact. Results from both the survey and/or focus groups will be used to establish a set of recommendations for modification of program promotional and information distribution.

The SBTO programs will review the results and recommendations from both the survey and/or focus groups, and take steps to implement change in program activities where applicable and necessary.

At the end of the calendar year, the SBTO programs will assess and measure the effectiveness of these program changes by tracking the number and types of facilities requesting assistance before and after implementation of the strategies.

2. Sharing Results

Given that the SBTO programs all around the country are continually seeking innovative outreach strategies designed to increase voluntary compliance with governmental regulations, any information gathered from these surveys and/or focus groups can be used by other assistance programs as the problem application is not state-specific.

III. PROJECT MILESTONES

This project is anticipated to take place between June 1, 2001 and September 30, 2003*.

- **First Quarter** (March 1, 2002 – May 31, 2002)
 - Post Request for Proposals (RFPs) and selection of contract consultant. Contractor determines what scope of project components can be implemented.
 - Contractor meets with representatives of the small business programs including the technical, ombudsman, and compliance advisory panel to discuss project scope, and specify the measurements needed to be included in survey instrument and/or focus groups.
If the survey is implemented, begin background research for survey instrument development.
 - Complete and submit quarterly progress report to the EPA, which includes:
 - ◆ A comparison of progress to work plan milestones;
 - ◆ Significant problems encountered; and
 - ◆ Any anticipated schedule revisions.
- **Second Quarter** (June 1, 2002 - August 31, 2002)
 - Develop draft survey instrument.
 - Small business program review of draft survey instrument.

- Identify and verify survey participants.
 - Modify survey instrument.
 - Beta test survey instrument and validate results.
 - Modify beta test survey instrument.
 - Written quarterly progress report by contractor to small business programs.
 - Complete and submit quarterly progress report to EPA, which includes:
 - ◆ A comparison of progress to work plan milestones;
 - ◆ Significant problems encountered; and
 - ◆ Any anticipated schedule revisions.
- **Third Quarter** (September 1, 2002 - November 30, 2002)
 - Begin delivery of survey instrument.
 - Conclude delivery of survey instrument .
 - Written quarterly progress report by contractor to small business programs.
 - Validate results of final version of survey instrument.
 - If focus groups are to be implemented, establish basis for focus groups.
 - Select focus group participants.
 - Complete and submit quarterly progress report to the EPA, which includes:
 - ◆ A comparison of progress to work plan milestones;
 - ◆ Significant problems encountered; and
 - ◆ Any anticipated schedule revisions.
- **Fourth and Fifth Quarters** (December 1, 2002 – May 31, 2003)
 - Begin focus groups.
 - Conclude focus groups.
 - Analyze results of survey and/or focus groups.
 - Complete and submit quarterly progress report to the EPA, which includes:
 - ◆ A comparison of progress to work plan milestones;
 - ◆ Significant problems encountered; and
 - ◆ Any anticipated schedule revisions.
- **Sixth and Seventh Quarters** (June 1, 2003 – September 30, 2003)
 - Draft report of survey and/or focus group results with recommendations for change or modification of programs.
 - Present draft report and recommendations to small business programs for comment.
 - Revise draft report.
 - Present final report to Small Business programs in final EPA format.

- Final written quarterly progress report by contractor to small business programs.
- Complete and submit final progress report to the EPA, which includes:
 - ◆ A determination of whether the multi-media guidebook was an effective tool for compliance assistance;
 - ◆ A determination of whether compliance assistance workshops provide an effective delivery system for program guidance documents;
 - ◆ A summary of the benefits of and improvements to the small business programs resulting from this project;
 - ◆ Suggestions on how and what format should the SBTO programs (and EPA) deliver their compliance assistance; and
 - ◆ The means/methods used to achieve the identified results and benefits.

* These dates represent the entire project period of the grant. Actual project implementation will begin on March 1, 2002.

IV. PROJECT COSTS

Total costs for this initiative are estimated at **\$49,802**.

Application for Enforcement and Compliance Assurance Assistance Grant/Cooperative Agreement Funding Budget	
Item	Cost
Federal Direct Charges Against the Grant	\$40,000
• Contractual Consultant (which includes the following expenses):	
– Salary and fringe benefits	
– Survey instrument development and distribution	
– Focus Group forums	
– Survey instrument printing	
– Transportation and travel for survey follow-up and focus group forums	
– Postage	
– Supplies	
– Written quarterly reports to small business programs	
– Written final report generation and printing for close of project	
In-kind contribution from the state	
• State Project Manager (1.0 FTE) at 1/8 salary and benefits	\$ 8,301.15
• Indirect Charges	1,500.85
TOTAL PROJECT COSTS	\$49,802.00