



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

June 3, 2022

MEMORANDUM

SUBJECT: OECA's Response to OIG's Report, *EPA's Fiscal Years 2021 and 2020 (Restated) Consolidated Financial Statements*, Report No. 22-F-0007, November 15, 2021

FROM: Lawrence E. Starfield, Acting Assistant Administrator

TO: Damon M. Jackson, Director
Financial Directorate
Office of Audit
Office of Inspector General

The Office of Enforcement and Compliance Assurance (OECA) is responding to the Office of Inspector General (OIG's) March 30, 2022 email request "to provide a formal response in accordance with EPA's Audit Management Procedures" to the OIG's Report, *EPA's Fiscal Years 2021 and 2020 (Restated) Consolidated Financial Statements*, Report No. 22-F-0007, November 15, 2021.¹ Thank you for the opportunity to respond to the recommendations in the subject audit report. OECA agrees with the OIG that it is important for EPA enforcement offices to submit supporting enforcement documentation to the Cincinnati Finance Center (CFC) in a timely manner. However, the timeliness figures in the OIG's Report No. 22-F-0007 appear to be incomplete; we would like to provide you some additional information to ensure that EPA's timeliness performance in fiscal year (FY) 2021 is fully presented.

In addition, we would suggest that the OIG not aggregate its review of the timeliness measure. If each activity were separately shown, the public could see where EPA has met or exceeded the timeliness goal and where EPA needs improvement. For instance, EPA has been meeting the five-business-day submittal standard² for administrative penalty orders at least 95% of the time since FY 2013.³ A review of the last four years shows that, in FY 2018, EPA was timely 95% of the time (1014 of 1070 instances); in FY 2019, EPA was timely 96% of the time (881 of 920 instances); in FY 2020, EPA was timely 95%

¹ The Agency had not previously provided a formal response because, in the OIG memorandum to OECA transmitting the final report on November 15, 2021, the OIG stated, "In accordance with EPA Manual 2750, your offices provided acceptable planned corrective actions and estimated milestone dates in response to the OIG's recommendations. All recommendations are resolved, and no final response to this report is required."

² According to [Resource Management Directive System \(RMDS\) No. 2540-9-P3](#), EPA enforcement offices are responsible for sending administrative penalty orders and final EPA stipulated penalty demand letters to CFC within five business days.

³ See page 2 of *EPA's Enforcement Offices Must Improve the Timely Transmission of EPA-Issued Final Demand Letters for Stipulated Penalties to the Cincinnati Finance Center* (attached), which says, "After OECA worked with the Regions to develop procedures and monitor performance, the enforcement program improved its performance, and *since FY 2013, has been timely 95 percent of the time in providing administrative penalty documentation to CFC.*"

of the time (874 of 920 instances); and in FY 2021, EPA was timely 98% of the time (897 of 918 instances). Please see Appendix A for further details.

These comments, and those discussed below, are consistent with prior responses OECA provided to the OIG: 1) OECA’s response on October 28, 2021, to the OIG’s Financial Directorate on Position Paper No. 1; and 2) the Agency response on November 10, 2021, to the OIG’s Draft Report, *EPA’s Fiscal Years 2021 and 2020 (Restated) Consolidated Financial Statements*, Report No. OA-FY21-0170, November 9, 2021. We would appreciate the opportunity to meet with OIG to ensure that we are reviewing the same data and have a shared understanding of EPA’s policy performance measures.

Request to Use Full Set of Accounts Receivable Data in Report No. 22-F-0007

In Table 3-1 at page 12, the OIG found that EPA and the Department of Justice (DOJ) had 16 late receivables out of 150 in FY 2021. A copy of the table is provided below for reference.

Table 3-1: Summary of receivables support not recorded timely

OIG analysis description	Number of receivables	Number of exceptions	Number of business days late	Amount
U.S. Department of Justice report reconciliation	46	8	1 to 32 days	\$28,287,715.00
Integrated Compliance Information System report reconciliation	71	1	69 days	\$116,445.00
Superfund control	29	3	2 to 8 days	\$11,785,762.16
Cut-off testing	4	4	4 to 138 days	\$10,519,000.00
Total	150	16		\$50,708,922.16

Source: OIG analysis of receivables tested. (EPA OIG table)

According to this table, it appears that the OIG obtained data from a DOJ report and an Integrated Compliance Information System (ICIS) report. OECA believes the best place to obtain accounts receivable timeliness information is from EPA’s Compass IT system (Compass), which houses EPA’s financial data and is the system the Agency uses to track its obligations under applicable policy. Because it is the Agency’s system of record for financial data, OECA uses data from Compass in the quarterly reports that it sends to regional managers on EPA’s timeliness performance. It is important that OECA and the OIG review the same data so that we can understand and make progress on EPA’s timeliness performance. Additionally, we have some questions about the meaning, source, and significance of some terms used in the OIG table, such as “Superfund control” and “Cut-off testing.”

For both Superfund and non-Superfund civil judicial consent decrees (CDs), DOJ’s Environment and Natural Resources Division (ENRD) is required to send CDs to the CFC within five business days.⁴ While EPA has assisted with these communications, EPA is not responsible, per EPA policy, and should not be measured in Report No. 22-F-0007, for DOJ’s timeliness in sending CDs to the CFC.

⁴ See page 10 of RMDS Chapter 2540-9-P3, [Administrative and Civil Judicial Penalties](#), and see page 12 of RMDS Chapter 2550D-14, [Superfund Accounts Receivables and Billing](#).

Page 12 of the OIG's Report No. 22-F-0007 highlights two specific examples of late accounts receivable related to Superfund CDs – one from Region 2 and another from Region 9. However, we believe that some additional context would be helpful. In the Region 2 example, the documentation was sent late to CFC, but we believe that the \$2.4 million receivable amount overstates the situation. Because only 25% of the \$2.4 million debt could be collected, the true value of this debt was approximately \$600,000, not \$2.4 million. For the \$8 million in receivables from Region 9, representing three related CDs, DOJ was late sending CFC the CDs after the court entered the CDs. Report No. 22-F-0007 states on page 12 that these receivables were not recorded in the proper fiscal year as a result of the documentation not being provided on time; however, the court entered the Region 9 CDs on September 28, and the receivables would have likely been recorded after the fiscal year ended even if the documentation had been provided within the allowed five days. This is a relatively common occurrence when courts finalize civil judicial settlements at the end of the fiscal year.

Request to Discuss the 95% Timeliness Goal in Report No. 22-F-0007

As noted above, EPA enforcement offices need to provide accounts receivable documentation for administrative penalty orders, final EPA stipulated penalty demand letters, and Superfund CDs to CFC within five business days 95% of the time.⁵ The 95% goal is stated in three memoranda.³

However, OIG did not mention the 95% goal in its report. We would urge that in order to accurately determine whether EPA met the 95% standard in FY 2021, the number of late accounts receivable documentation in FY 2021 should be divided by the total number of accounts receivable documentation in FY 2021. Because OIG gathered data from sources other than Compass, your office did not have a complete picture. We believe that OIG could best determine whether the 95% standard was met or not using the complete set of data in the Compass IT system.

Request Not to Aggregate Data In Order to Show Goals Met or Missed

As noted above, we would suggest that OIG not aggregate its assessment of timeliness for administrative penalty orders, final EPA stipulated penalty demand letters, and Superfund CDs. Doing so obscures the progress that EPA has made on some measures. For example, EPA has met or exceeded the 95% goal for many years for administrative penalty orders. Also, while EPA had a timeliness rate of 19% for final EPA stipulated penalty demand letters in FY 2017 (timely in 7 out of 37 instances), OECA has since taken aggressive measures to increase that percentage to 90% in FY 2021 (timely in 18 out of 20 instances). See Appendix B for further details.

Stipulated penalty demand letters are very different from administrative penalty orders or CDs. After both parties sign a settlement, the regulated party may be required to perform certain actions. If the party fails to perform those actions, the party may be subject to stipulated penalties. EPA may issue a stipulated penalty demand letter to the party stating the party violated a provision of the settlement and request the party pay a stipulated penalty. After EPA issues the final stipulated penalty demand letter, EPA must send the letter to CFC within five business days to create an account receivable.

⁵ See EPA's Enforcement Offices Must Improve the Timely Transmission of EPA-Issued Final Demand Letters for Stipulated Penalties to the Cincinnati Finance Center (November 15, 2017); Providing Timely Documentation of EPA Issued Demand Letters for Stipulated Penalties and Other Accounts Receivable Arising from EPA Enforcement Actions (May 22, 2015); and Improvements to Procedures for Tracking the Assessment and Collection of Civil Penalty Accounts Receivable in Administrative Enforcement Actions (October 4, 2011). The three memoranda are attached.

Stipulated penalty demand letters may also come from other sources besides EPA, such as DOJ or a co-plaintiff (e.g., state). Additionally, a defendant may self-report the violation and submit a stipulated penalty payment to EPA without a government entity issuing a demand letter. EPA has been working to implement protocols with DOJ, co-plaintiffs, and defendants to send demand letters and self-reported letters to CFC within five business days of the debt being triggered as a result of an action occurring that triggers the penalty obligation. However, these instances are 1) outside of what EPA policies require of EPA and 2) beyond the control of EPA; therefore, we believe that these instances should be outside the scope of this measure. We respectfully request that OIG review accounts receivable based on final EPA-issued stipulated demand letters and not based on stipulated penalty demand letters from other sources and self-reported stipulated penalties by defendants for which EPA has no control.

Desire to Improve Communications Between OIG and OECA

We also have some concerns about communications between our offices.

First, we are concerned that insufficient time has been provided for comment by OECA. On October 25, 2021, OIG sent OECA *EPA's Fiscal Year 2021 Financial Statement Audit – Position Paper No. 1 Accounts Receivable Source Determination Not Provided Timely by Regions* (Position Paper) and requested a written response by October 28, 2021. On October 28, 2021, OECA provided a response. Similarly, on November 9, 2021, the OIG, through the Office of the Chief Financial Officer, sent a *Draft of EPA's Fiscal Years 2021 and 2020 (Restated) Consolidated Financial Statements* (Draft Consolidated Financial Statements) to OECA and requested comments the next day, November 10, 2021. OECA staff had to work under extreme time pressure to provide a response on November 10, 2021. In those communications, OIG did not provide a reasonable amount of time for OECA to respond.

Second, OECA worked hard to submit comments under time pressure, but it doesn't appear that our comments were considered. While we understand OIG conducts an independent review and does not incorporate all comments received, we would have thought that OIG would correct data inaccuracies identified by OECA. We would appreciate the opportunity to discuss this issue, and to learn whether there is a process for receiving some feedback on comments that we provide.

Corrective Action Table

	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion Date
4	Enforce the existing policies and procedures, which includes forwarding accounts receivable source documents to the Cincinnati Finance Center, in accordance with the time frames provided in the applicable Resource Management directives.	<p>Background: OECA agrees with OIG's recommendation to send quarterly reports to regions. OECA has been sending quarterly reports on EPA's timeliness performance to regional managers for years and follows up with regional managers to identify systemic problems causing untimely submissions. The data is typically available a month and a half after the quarter ends, and it takes another week to distribute the data and follow up with regions.</p> <p>Action: For the first quarter of FY 2022, OECA sent this data to regional managers on January</p>	Q1 - Completed on 1/11/22

		<p>11, 2022; for the second quarter of FY 2022, OECA sent this data to regional managers on April 25, 2022, and will do so for the remaining quarters in FY 2022.</p> <p>Action: OECA sent a reminder to regional managers of existing RMDS policies related to timely transmittal of accounts receivable source documentation.</p>	<p>Q2 - Completed on 4/25/22 Q3 – 8/31/22 Q4 – 11/30/22</p> <p>Completed - 3/2/22</p>
5	<p>Implement a system that tracks the dates when accounts receivable source documents need to be submitted and are submitted by the Office of Enforcement and Compliance Assurance to the Cincinnati Finance Center.</p>	<p>Background: OECA agrees with OIG’s recommendation to develop an electronic system for tracking. OECA is working with several EPA offices to develop the Enterprise Legal Case Management (ELCM) system. This system will have many functions, including allowing the Regional Hearing Clerks to simultaneously transmit EPA stipulated demand letters to respondents and CFC. The five-day period for sending EPA stipulated penalty demand letters to CFC starts when the letter is served to the respondent. The ELCM system will assist in improving EPA’s timeliness performance.</p> <p>The expected launch date of ELCM is September 30, 2022. After ELCM is launched, Regional Hearing Clerks will need training for and experience with the new system, which we estimate will take an additional two months.</p> <p>Action: Implement a system that tracks the dates when accounts receivable source documents need to be submitted and are submitted by the Office of Enforcement and Compliance Assurance to the Cincinnati Finance Center.</p>	<p>11/30/22</p>

Contact Information

If you have any questions regarding these comments, please contact Gwendolyn Spriggs, OECA’s Audit Follow-up Coordinator, at spriggs.gwendolyn@epa.gov.

Attachments

cc: David Cozad, Senior Advisor, OECA
Rosemarie Kelley, Director, OECA/OCE
Cyndy Mackey, Director, OECA/OSRE
Richard Albores, Acting Director, OECA/FFEO
Gwendolyn Spriggs, Audit Follow-up Coordinator, OECA/OAP

APPENDIX A: Timeliness Performance of Sending Administrative Penalty Orders to CFC

FY 2021 Summary of Performance Measures for OECA - Administrative

Standard = 95% All billings sent to CFC within 5 business days of origination per *Resource Management Directive System Number: 2540-09*

2021

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%
	332	326	98%	228	223	98%	202	197	98%	156	151	97%	918	897	98%
Region1															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	25	25	100%	14	14	100%	23	23	100%	7	6	86%	69	68	99%
Overall Administratives	25	25	100%	14	14	100%	23	23	100%	7	6	86%	69	68	99%
Region2															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	22	22	100%	18	17	94%	21	19	90%	16	14	88%	77	72	94%
Overall Administratives	22	22	100%	18	17	94%	21	19	90%	16	14	88%	77	72	94%
Region3															
Superfund "B" coded only	0	0	0	2	2	100%	0	0	0	0	0	0	2	2	100%
Non-Superfund Administratives	19	19	100%	21	21	100%	16	16	100%	13	13	100%	69	69	100%
Overall Administratives	19	19	100%	23	23	100%	16	16	100%	13	13	100%	71	71	100%
Region4															
Superfund "B" coded only	3	3	100%	1	1	100%	0	0	0	0	0	0	4	4	100%
Non-Superfund Administratives	59	56	95%	22	22	100%	21	21	100%	23	23	100%	125	122	98%
Overall Administratives	62	59	95%	23	23	100%	21	21	100%	23	23	100%	129	126	98%
Region5															
Superfund "B" coded only	3	3	100%	0	0	0	0	0	0	2	2	100%	5	5	100%
Non-Superfund Administratives	47	47	100%	46	46	100%	38	38	100%	21	21	100%	152	152	100%
Overall Administratives	50	50	100%	46	46	100%	38	38	100%	23	23	100%	157	157	100%
Region6															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	38	37	97%	28	27	96%	24	23	96%	18	17	94%	108	104	96%
Overall Administratives	38	37	97%	28	27	96%	24	23	96%	18	17	94%	108	104	96%
Region7															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	13	13	100%	16	16	100%	15	15	100%	17	17	100%	61	61	100%
Overall Administratives	13	13	100%	16	16	100%	15	15	100%	17	17	100%	61	61	100%
Region8															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	10	9	90%	6	6	100%	7	7	100%	12	11	92%	35	33	94%
Overall Administratives	10	9	90%	6	6	100%	7	7	100%	12	11	92%	35	33	94%
Region9															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	30	29	97%	19	17	89%	18	17	94%	15	15	100%	82	78	95%
Overall Administratives	30	29	97%	19	17	89%	18	17	94%	15	15	100%	82	78	95%
Region10															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	58	58	100%	34	33	97%	19	18	95%	10	10	100%	121	119	98%
Overall Administratives	58	58	100%	34	33	97%	19	18	95%	10	10	100%	121	119	98%
RegionHQ															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	5	5	100%	1	1	100%	0	0	0	2	2	100%	8	8	100%
Overall Administratives	5	5	100%	1	1	100%	0	0	0	2	2	100%	8	8	100%

FY 2020 Summary of Performance Measures for OECA - Administrative

Standard = 95% All billings sent to CFC within 5 business days of origination per Resource Management Directive System Number: 2540-09

2020

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%
	306	296	97%	196	186	95%	233	217	93%	185	175	95%	920	874	95%
Region1															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
Non-Superfund Administratives	13	13	100%	8	7	88%	14	12	86%	8	7	88%	43	39	91%
Overall Administratives	13	13	100%	8	7	88%	14	12	86%	9	8	89%	44	40	91%
Region2															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	30	30	100%	18	18	100%	22	22	100%	23	23	100%	93	93	100%
Overall Administratives	30	30	100%	18	18	100%	22	22	100%	23	23	100%	93	93	100%
Region3															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	21	21	100%	17	17	100%	22	22	100%	19	19	100%	79	79	100%
Overall Administratives	21	21	100%	17	17	100%	22	22	100%	19	19	100%	79	79	100%
Region4															
Superfund "B" coded only	2	2	100%	1	1	100%	0	0	0	1	1	100%	4	4	100%
Non-Superfund Administratives	56	52	93%	21	21	100%	20	18	90%	14	14	100%	111	105	95%
Overall Administratives	58	54	93%	22	22	100%	20	18	90%	15	15	100%	115	109	95%
Region5															
Superfund "B" coded only	1	1	100%	1	1	100%	4	4	100%	0	0	0	6	6	100%
Non-Superfund Administratives	34	34	100%	18	18	100%	48	45	94%	21	20	95%	121	117	97%
Overall Administratives	35	35	100%	19	19	100%	52	49	94%	21	20	95%	127	123	97%
Region6															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	26	23	88%	27	23	85%	34	31	91%	27	21	78%	114	98	86%
Overall Administratives	26	23	88%	27	23	85%	34	31	91%	27	21	78%	114	98	86%
Region7															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	24	24	100%	25	25	100%	26	24	92%	25	25	100%	100	98	98%
Overall Administratives	24	24	100%	25	25	100%	26	24	92%	25	25	100%	100	98	98%
Region8															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	15	15	100%	20	20	100%	4	4	100%	4	4	100%	43	43	100%
Overall Administratives	15	15	100%	20	20	100%	4	4	100%	4	4	100%	43	43	100%
Region9															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	35	33	94%	12	12	100%	14	12	86%	17	16	94%	78	73	94%
Overall Administratives	35	33	94%	12	12	100%	14	12	86%	17	16	94%	78	73	94%
Region10															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
Non-Superfund Administratives	48	47	98%	23	20	87%	20	18	90%	22	22	100%	113	107	95%
Overall Administratives	48	47	98%	23	20	87%	20	18	90%	23	23	100%	114	108	95%
RegionHQ															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	1	1	100%	5	3	60%	5	5	100%	2	1	50%	13	10	77%
Overall Administratives	1	1	100%	5	3	60%	5	5	100%	2	1	50%	13	10	77%

FY 2019 Summary of Performance Measures for OECA - Administrative

Standard = 95% All billings sent to CFC within 5 business days of origination per Resource Management Directive System Number: 2540-09

2019

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%
	359	341	95%	253	243	96%	142	133	94%	166	164	99%	920	881	96%
Region1															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	23	23	100%	14	14	100%	9	8	89%	0	0	0	46	45	98%
Overall Administratives	23	23	100%	14	14	100%	9	8	89%	0	0	0	46	45	98%
Region2															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	28	27	96%	31	29	94%	20	20	100%	26	25	96%	105	101	96%
Overall Administratives	28	27	96%	31	29	94%	20	20	100%	26	25	96%	105	101	96%
Region3															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	43	43	100%	18	17	94%	18	18	100%	20	20	100%	99	98	99%
Overall Administratives	43	43	100%	18	17	94%	18	18	100%	20	20	100%	99	98	99%
Region4															
Superfund "B" coded only	2	2	100%	0	0	0	1	1	100%	0	0	0	3	3	100%
Non-Superfund Administratives	51	50	98%	31	31	100%	21	21	100%	11	11	100%	114	113	99%
Overall Administratives	53	52	98%	31	31	100%	22	22	100%	11	11	100%	117	116	99%
Region5															
Superfund "B" coded only	1	1	100%	1	1	100%	0	0	0	2	2	100%	4	4	100%
Non-Superfund Administratives	38	38	100%	49	49	100%	8	8	100%	31	31	100%	126	126	100%
Overall Administratives	39	39	100%	50	50	100%	8	8	100%	33	33	100%	130	130	100%
Region6															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	49	43	88%	9	6	67%	13	12	92%	16	15	94%	87	76	87%
Overall Administratives	49	43	88%	9	6	67%	13	12	92%	16	15	94%	87	76	87%
Region7															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	25	22	88%	41	41	100%	13	13	100%	16	16	100%	95	92	97%
Overall Administratives	25	22	88%	41	41	100%	13	13	100%	16	16	100%	95	92	97%
Region8															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	12	10	83%	10	10	100%	7	6	86%	2	2	100%	31	28	90%
Overall Administratives	12	10	83%	10	10	100%	7	6	86%	2	2	100%	31	28	90%
Region9															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
Non-Superfund Administratives	34	31	91%	19	16	84%	16	11	69%	25	25	100%	94	83	88%
Overall Administratives	34	31	91%	19	16	84%	16	11	69%	26	26	100%	95	84	88%
Region10															
Superfund "B" coded only	1	1	100%	1	1	100%	0	0	0	0	0	0	2	2	100%
Non-Superfund Administratives	44	44	100%	23	22	96%	14	13	93%	15	15	100%	96	94	98%
Overall Administratives	45	45	100%	24	23	96%	14	13	93%	15	15	100%	98	96	98%
RegionHQ															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	8	6	75%	6	6	100%	2	2	100%	1	1	100%	17	15	88%
Overall Administratives	8	6	75%	6	6	100%	2	2	100%	1	1	100%	17	15	88%

FY 2018 Summary of Performance Measures for OECA - Administrative

Standard = 95% All billings sent to CFC within 5 business days of origination per *Resource Management Directive System Number: 2540-09*

2018

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%
	396	375	95%	275	261	95%	212	198	93%	187	180	96%	1070	1014	95%
Region1															
Superfund "B" coded only	1	0	0	0	0	0	1	1	100%	0	0	0	2	1	50%
Non-Superfund Administratives	25	23	92%	11	10	91%	6	6	100%	7	7	100%	49	46	94%
Overall Administratives	26	23	88%	11	10	91%	7	7	100%	7	7	100%	51	47	92%
Region2															
Superfund "B" coded only	0	0	0	0	0	0	1	1	100%	0	0	0	1	1	100%
Non-Superfund Administratives	33	30	91%	27	24	89%	14	12	86%	21	19	90%	95	85	89%
Overall Administratives	33	30	91%	27	24	89%	15	13	87%	21	19	90%	96	86	90%
Region3															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	44	42	95%	31	29	94%	21	19	90%	24	23	96%	120	113	94%
Overall Administratives	44	42	95%	31	29	94%	21	19	90%	24	23	96%	120	113	94%
Region4															
Superfund "B" coded only	1	1	100%	3	3	100%	5	5	100%	5	5	100%	14	14	100%
Non-Superfund Administratives	54	53	98%	35	35	100%	33	33	100%	14	14	100%	136	135	99%
Overall Administratives	55	54	98%	38	38	100%	38	38	100%	19	19	100%	150	149	99%
Region5															
Superfund "B" coded only	1	1	100%	2	2	100%	1	1	100%	1	1	100%	5	5	100%
Non-Superfund Administratives	56	56	100%	49	46	94%	25	25	100%	24	24	100%	154	151	98%
Overall Administratives	57	57	100%	51	48	94%	26	26	100%	25	25	100%	159	156	98%
Region6															
Superfund "B" coded only	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0
Non-Superfund Administratives	45	42	93%	25	23	92%	32	28	88%	29	27	93%	131	120	92%
Overall Administratives	46	42	91%	25	23	92%	32	28	88%	29	27	93%	132	120	91%
Region7															
Superfund "B" coded only	0	0	0	1	1	100%	0	0	0	1	1	100%	2	2	100%
Non-Superfund Administratives	29	29	100%	31	31	100%	22	21	95%	26	25	96%	108	106	98%
Overall Administratives	29	29	100%	32	32	100%	22	21	95%	27	26	96%	110	108	98%
Region8															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	11	11	100%	5	5	100%	4	4	100%	15	15	100%	35	35	100%
Overall Administratives	11	11	100%	5	5	100%	4	4	100%	15	15	100%	35	35	100%
Region9															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	44	38	86%	22	21	95%	21	18	86%	8	8	100%	95	85	89%
Overall Administratives	44	38	86%	22	21	95%	21	18	86%	8	8	100%	95	85	89%
Region10															
Superfund "B" coded only	0	0	0	1	1	100%	0	0	0	0	0	0	1	1	100%
Non-Superfund Administratives	46	44	96%	23	22	96%	21	19	90%	9	9	100%	99	94	95%
Overall Administratives	46	44	96%	24	23	96%	21	19	90%	9	9	100%	100	95	95%
RegionHQ															
Superfund "B" coded only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Superfund Administratives	5	5	100%	9	8	89%	5	5	100%	3	2	67%	22	20	91%
Overall Administratives	5	5	100%	9	8	89%	5	5	100%	3	2	67%	22	20	91%

APPENDIX B: Timeliness Performance of Sending EPA Stipulated Penalty Demand Letters to CFC

FY 2021

Summary of Performance Measures for Stipulated Penalties

Standard = 95% All billings sent to CFC within 5 business days per RMDS Number: 2540-09

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

By Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%
	3	2	67%	15	12	80%	9	7	78%	7	6	86%	34	27	79%
Region1															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Region2															
EPA Demand	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	3	2	67%	3	3	100%	5	2	40%	3	3	100%	14	10	71%
Overall Stipulated Penalties	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
Region3															
EPA Demand	1	1	100%	2	2	100%	1	1	100%	1	1	100%	5	5	100%
DOJ Demand	1	0	0	1	1	100%	0	0	0	0	0	0	2	1	50%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	3	2	67%	3	2	67%	5	3	60%	3	2	67%	14	9	64%
Overall Stipulated Penalties	2	1	50%	3	3	100%	1	1	100%	1	1	100%	7	6	86%
Region4															
EPA Demand	0	0	0	0	0	0	1	1	100%	0	0	0	1	1	100%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	1	1	100%	0	0	0	1	1	100%
Self Reported	0	0	0	0	0	0	1	1	100%	2	1	50%	3	2	67%
Overall Stipulated Penalties	0	0	0	0	0	0	2	2	100%	0	0	0	2	2	100%
Region5															
EPA Demand	0	0	0	2	2	100%	0	0	0	0	0	0	2	2	100%
DOJ Demand	0	0	0	0	0	0	0	0	0	2	1	50%	2	1	50%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	2	2	100%	0	0	0	2	1	50%	4	3	75%
Region6															
EPA Demand	0	0	0	5	5	100%	0	0	0	0	0	0	5	5	100%
DOJ Demand	1	1	100%	0	0	0	0	0	0	1	1	100%	2	2	100%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	1	100%	5	5	100%	0	0	0	1	1	100%	7	7	100%
Region7															
EPA Demand	0	0	0	1	1	100%	1	1	100%	0	0	0	2	2	100%
DOJ Demand	0	0	0	0	0	0	2	2	100%	0	0	0	2	2	100%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	1	1	100%	3	3	100%	0	0	0	4	4	100%
Region8															
EPA Demand	0	0	0	2	0	0	0	0	0	0	0	0	2	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	2	0	0	0	0	0	0	0	0	2	0	0
Region9															
EPA Demand	0	0	0	0	0	0	0	0	0	2	2	100%	2	2	100%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	0	0	0	0	0	0	2	2	100%	2	2	100%
Region10															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0
Other Demand	0	0	0	0	0	0	2	0	0	0	0	0	2	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	1	0	0	2	0	0	0	0	0	3	0	0
RegionHQ															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	1	1	100%	1	1	100%	0	0	0	2	2	100%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	1	1	100%	1	1	100%	0	0	0	2	2	100%

Accumulative YTD			
By Categories	# Items	Target	%
EPA Demand	20	18	90%
DOJ Demand	11	8	73%
Other Demand	3	1	33%
Self Reported	31	21	68%

Summary of Performance Measures for Stipulated Penalties

Standard = 95% All billings sent to CFC within 5 business days per RMDS Number: 2540-09

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

By Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	#Items	Target	%	#Items	Target	%	#Items	Target	%	#Items	Target	%	#Items	Target	%
	26	15	38%	25	15	60%	20	14	70%	36	33	83%	107	77	73%
Region1															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0
Overall Stipulated Penalties	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0
Region2															
EPA Demand	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
DOJ Demand	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	3	1	33%	5	3	60%	2	2	100%	4	4	100%	14	10	71%
Overall Stipulated Penalties	3	1	33%	5	3	60%	2	2	100%	6	6	100%	16	12	75%
Region3															
EPA Demand	4	3	75%	2	2	100%	1	1	100%	6	6	100%	13	12	92%
DOJ Demand	0	0	0	0	0	0	0	0	0	3	3	100%	3	3	100%
Other Demand	0	0	0	1	1	100%	0	0	0	1	1	100%	2	2	100%
Self Reported	7	5	71%	4	4	100%	6	6	100%	5	5	100%	22	20	91%
Overall Stipulated Penalties	11	8	73%	7	7	100%	7	7	100%	15	15	100%	40	37	93%
Region4															
EPA Demand	2	1	50%	0	0	0	0	0	0	0	0	0	2	1	50%
DOJ Demand	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
Other Demand	1	1	100%	0	0	0	0	0	0	1	0	0	2	1	50%
Self Reported	1	1	100%	1	1	100%	1	1	100%	2	2	100%	5	5	100%
Overall Stipulated Penalties	4	3	75%	1	1	100%	1	1	100%	4	3	75%	10	8	80%
Region5															
EPA Demand	3	0	0	1	0	0	0	0	0	2	2	100%	6	2	33%
DOJ Demand	2	1	50%	0	0	0	2	1	50%	1	1	100%	5	3	60%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	5	1	20%	1	0	0	2	1	50%	3	3	100%	11	5	45%
Region6															
EPA Demand	0	0	0	0	0	0	1	1	100%	0	0	0	1	1	100%
DOJ Demand	1	1	100%	1	1	100%	3	0	0	3	3	100%	8	5	63%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	1	0	0	0	0	0	0	0	0	1	1	100%	2	1	50%
Overall Stipulated Penalties	2	1	50%	1	1	100%	4	1	25%	4	4	100%	11	7	64%
Region7															
EPA Demand	0	0	0	1	1	100%	0	0	0	0	0	0	1	1	100%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0
Overall Stipulated Penalties	0	0	0	2	1	50%	0	0	0	0	0	0	2	1	50%
Region8															
EPA Demand	0	0	0	0	0	0	1	1	100%	2	2	100%	3	3	100%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	1	1	100%	0	0	0	1	1	100%
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	0	0	0	2	2	100%	2	2	100%	4	4	100%
Region9															
EPA Demand	1	1	100%	8	2	25%	0	0	0	0	0	0	9	3	33%
DOJ Demand	0	0	0	0	0	0	2	0	0	0	0	0	2	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	1	100%	8	2	25%	2	0	0	0	0	0	11	3	27%
Region10															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0
RegionHQ															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	0	0	0	0	0	0	0	0	#DIV/0!	0	0	#DIV/0!

Accumulative YTD			
By Categories	#Items	Target	%
EPA Demand	36	24	67%
DOJ Demand	20	13	65%
Other Demand	6	4	67%
Self Reported	45	36	80%

If not self reporting: 62 41 66%

FY 2019

Summary of Performance Measures for Stipulated Penalties

Standard = 95% All billings sent to CFC within 5 business days per RMDs Number: 2540-09

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

By Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%
	35	25	71%	26	21	81%	21	13	62%	24	20	83%	106	79	75%
Region1															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0
Overall Stipulated Penalties	1	0	0%	1	0	0%	0	0	0%	0	0	0%	2	0	0%
Region2															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	6	4	67%	5	4	80%	5	2	40%	4	3	75%	20	13	65%
Overall Stipulated Penalties	6	4	67%	5	4	80%	5	2	40%	4	3	75%	20	13	65%
Region3															
EPA Demand	0	0	0	1	1	100%	1	1	100%	2	2	100%	4	4	100%
DOJ Demand	0	0	0	2	1	50%	0	0	0	0	0	0	2	1	50%
Other Demand	3	1	33%	0	0	0	0	0	0	2	2	100%	5	3	60%
Self Reported	11	9	82%	4	4	100%	7	5	71%	6	5	83%	28	23	82%
Overall Stipulated Penalties	14	10	71%	7	6	86%	8	6	75%	10	9	90%	39	31	79%
Region4															
EPA Demand	1	0	0	3	3	100%	0	0	0	1	1	100%	5	4	80%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
Self Reported	2	2	100%	1	1	100%	1	1	100%	1	1	100%	5	5	100%
Overall Stipulated Penalties	3	2	67%	4	4	100%	1	1	100%	3	3	100%	11	10	91%
Region5															
EPA Demand	0	0	0	1	1	100%	0	0	0	0	0	0	1	1	100%
DOJ Demand	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0
Overall Stipulated Penalties	0	0	0%	1	1	100%	2	0	0%	0	0	0%	3	1	33%
Region6															
EPA Demand	3	3	100%	0	0	0	1	0	0	2	1	50%	6	4	67%
DOJ Demand	2	2	100%	1	1	100%	0	0	0	1	1	100%	4	4	100%
Other Demand	1	1	100%	0	0	0	0	0	0	0	0	0	1	1	100%
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	6	6	100%	1	1	100%	1	0	0%	3	2	67%	11	9	81%
Region7															
EPA Demand	1	1	100%	2	1	50%	0	0	0	2	2	100%	5	4	80%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	1	100%	2	1	50%	0	0	0%	2	2	100%	5	4	80%
Region8															
EPA Demand	2	2	100%	2	2	100%	3	3	100%	1	1	100%	8	8	100%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	1	0	0	1	1	100%	1	1	100%	0	0	0	3	2	67%
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	3	2	67%	3	3	100%	4	4	100%	1	1	100%	11	10	91%
Region9															
EPA Demand	1	0	0	1	1	100%	0	0	0	0	0	0	2	1	50%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	0	0%	1	1	100%	0	0	0%	0	0	0%	2	1	50%
Region10															
EPA Demand	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0%	1	0	0%	0	0	0%	1	0	0%	2	0	0%
RegionHQ															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0%	0	0	0%	0	0	0%	0	0	0%	0	0	0%

Accumulative YTD			
By Categories	# Items	Target	%
	106	79	75%
EPA Demand	32	26	81%
DOJ Demand	8	5	63%
Other Demand	11	7	64%
Self Reported	55	41	75%

FY 2018

Summary of Performance Measures for Stipulated Penalties

Standard = 95% All billings sent to CFC within 5 business days per RMD5 Number: 2540-09

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

By Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%
	32	26	81%	29	20	69%	18	10	56%	25	15	60%	104	71	68%
Region1															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	7	5	71%	0	0	0	2	0	0	4	0	0	13	5	38%
Overall Stipulated Penalties	7	5	71%	0	0	0	2	0	0%	4	0	0%	13	5	38%
Region2															
EPA Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	1	1	100%	1	1	100%
Self Reported	0	0	0	5	4	80%	2	1	50%	6	3	50%	13	8	62%
Overall Stipulated Penalties	0	0	0	5	4	80%	2	1	50%	7	4	57%	14	9	64%
Region3															
EPA Demand	5	5	100%	2	0	0	0	0	0	0	0	0	7	5	71%
DOJ Demand	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0
Other Demand	1	1	100%	0	0	0	0	0	0	0	0	0	1	1	100%
Self Reported	6	5	83%	6	4	67%	2	1	50%	5	5	100%	19	15	79%
Overall Stipulated Penalties	13	11	85%	8	4	50%	2	1	50%	5	5	100%	28	21	75%
Region4															
EPA Demand	2	1	50%	0	0	0	2	1	50%	0	0	0	4	2	50%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	2	1	50%	0	0	0	0	0	0	2	1	50%
Self Reported	3	3	100%	1	0	0	1	1	100%	1	1	100%	6	3	83%
Overall Stipulated Penalties	5	4	80%	3	1	33%	3	2	67%	1	1	100%	12	8	67%
Region5															
EPA Demand	0	0	0	3	3	100%	1	0	0	0	0	0	4	3	75%
DOJ Demand	1	1	100%	0	0	0	0	0	0	2	1	50%	3	2	67%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	1	100%	3	3	100%	1	0	0%	2	1	50%	7	5	71%
Region6															
EPA Demand	1	1	100%	2	1	50%	0	0	0	1	1	100%	4	3	75%
DOJ Demand	2	1	50%	0	0	0	1	1	100%	1	1	100%	4	3	75%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	3	2	67%	2	1	50%	1	1	100%	2	2	100%	8	6	75%
Region7															
EPA Demand	1	1	100%	0	0	0	1	0	0	1	1	100%	3	2	67%
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	1	100%	0	0	0	1	0	0%	1	1	100%	3	2	67%
Region8															
EPA Demand	0	0	0	1	1	100%	3	3	100%	2	1	50%	6	5	83%
DOJ Demand	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0
Other Demand	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	2	1	50%	4	3	75%	2	1	50%	8	5	63%
Region9															
EPA Demand	0	0	0	6	6	100%	1	1	100%	0	0	0	7	7	100%
DOJ Demand	1	1	100%	0	0	0	0	0	0	0	0	0	1	1	100%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	1	100%	6	6	100%	1	1	100%	0	0	0	8	8	100%
Region10															
EPA Demand	1	1	100%	0	0	0	0	0	0	0	0	0	1	1	100%
DOJ Demand	0	0	0	0	0	0	1	1	100%	0	0	0	1	1	100%
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	1	100%	0	0	0	1	1	100%	0	0	0	2	2	100%
RegionHQ															
EPA Demand	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0
DOJ Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	0	0	0	0	0	0	1	0	0%	1	0	0%

Accumulative YTD			
By Categories	# Items	Target	%
EPA Demand	37	28	76%
DOJ Demand	11	7	64%
Other Demand	5	3	60%
Self Reported	51	33	65%

Summary of Performance Measures for Stipulated Penalties

Standard = 95% All billings sent to CFC within 5 business days of origination per Resource Management Directive System Number: 2540-09

Measure = Meet standard 95% of the time = On Target

Measure = Failed to meet standard 95% of the time = Needs Improvement

Region	4th Quarter			3rd Quarter			2nd Quarter			1st Quarter			Accumulative YTD		
	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%	# Items	Target	%
	21	10	48%	26	12	46%	23	10	43%	20	8	40%	90	40	44%
Region1															
Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	1	1	100%	0	0	0	0	0	0	1	0	0	2	1	50%
Overall Stipulated Penalties	1	1	100%	0	0	0	0	0	0	1	0	0%	2	1	50%
Region2															
Demand	1	0	0	0	0	0	1	0	0	2	0	0	4	0	0
Self Reported	3	3	100%	3	3	100%	5	2	40%	3	1	33%	14	9	64%
Overall Stipulated Penalties	4	3	75%	3	3	100%	6	2	33%	5	1	20%	18	9	50%
Region3															
Demand	3	1	33%	1	0	0	1	0	0	2	0	0	7	1	14%
Self Reported	7	3	43%	12	8	67%	5	4	80%	3	3	100%	27	18	67%
Overall Stipulated Penalties	10	4	40%	13	8	62%	6	4	67%	5	3	60%	34	19	56%
Region4															
Demand	3	1	33%	0	0	0	2	0	0	1	0	0	6	1	17%
Self Reported	1	1	100%	0	0	0	3	2	67%	1	1	100%	5	4	80%
Overall Stipulated Penalties	4	2	50%	0	0	0	5	2	40%	2	1	50%	11	5	45%
Region5															
Demand	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Self Reported	1	0	0	0	0	0	1	0	0	0	0	0	2	0	0
Overall Stipulated Penalties	1	0	0%	0	0	0	1	0	0%	0	0	0	2	0	0%
Region6															
Demand	0	0	0	5	1	20%	2	1	50%	1	0	0	8	2	25%
Self Reported	0	0	0	1	0	0	0	0	0	2	2	100%	3	2	67%
Overall Stipulated Penalties	0	0	0	6	1	17%	2	1	50%	3	2	67%	11	4	36%
Region7															
Demand	0	0	0	1	0	0	1	1	100%	0	0	0	2	1	50%
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	1	0	0%	1	1	100%	0	0	0	2	1	50%
Region8															
Demand	0	0	0	2	0	0	2	0	0	0	0	0	4	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	2	0	0%	2	0	0%	0	0	0	4	0	0%
Region9															
Demand	0	0	0	0	0	0	0	0	0	2	1	50%	2	1	50%
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	0	0	0	0	0	0	2	1	50%	2	1	50%
Region10															
Demand	0	0	0	1	0	0	0	0	0	2	0	0	3	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	0	0	0	1	0	0%	0	0	0	2	0	0%	3	0	0%
RegionHQ															
Demand	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0
Self Reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overall Stipulated Penalties	1	0	0%	0	0	0	0	0	0	0	0	0	1	0	0%