Message

From: Nguyen, Khue [Nguyen.Khue@epa.gov]
Sent: 5/6/2020 11:56:01 AM
To: Smith, Charles [Smith.Charles@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]
CC: Britton, Cathryn [Britton.Cathryn@epa.gov]
Subject: artic slope contract work: update
Attachments: Arctic Slope - Docket Comments TO - EP-W-17-011 (TO #68HERG19F0129 Award Pgs 1 thru 17)- Signed 4-15-19.pdf; 2008-0331 pyrethroids.Substantive and Anonymous.PRD feedback 4.16.20.xlsx; pyrethroids_EPA-HQ-OPP-2008-0331.comment export from regulations.gov.version 2.csv

Hi Elissa and Billy,

I wanted to give you both an update on the work with Artic Slope, the contractor that is helping PRD with comment review/summary/binning under the new task order created by ITRMD (the task order is attached). The task order charges the contractor with the following tasks: compile, categorize, and summarize public comments for pesticide review actions. In addition, the task order notes that the contractor shall export all comments from the public docket into a Microsoft excel spreadsheet and categorize the info in a manner that allows appropriate personnel to provide a response to each comment or category of comments.

PRD has been working with Artic Slope for about a year, and they have worked on the following items: glyphosate EWG petition comments, glyphosate PID comments, clothianidin petition comments, and pyrethroids comments on the eco risk mitigation proposal. They have also done comment review work for RD, AD, and BPPD thus far, and may do some work for EFED in the future for ESA comments.

I believe that ITRMD intends to renew the contract. So far, PRD is the only division that has provided meaningful feedback on the comment review work. I am not sure that other divisions have really reviewed the work from the contractors or have much experience with FDMS or regulations.gov.

Below is an outline of the quality issues that we have observed over time, for each of the tasks assigned to Artic Slope:

1) **Glyphosate EWG petition comments:** PRD asked Artic Slope to be more precise in describing comments, particularly, to note what specific action a commenter is requesting of EPA. There were discrepancies in what the commenter is requesting vs how that request is described in the Artic Slope summary. PRD asked for additional clarity on data citations—it was not clear when commenters were citing specific scientific data/studies or when describing a personal anecdote. PRD asked for a page count for each comment attachment.

2) **Glyphosate PID comments:** the comment summaries did not provide an adequate level of detail so that EPA can tell what the commenter was saying and what their concerns were. Some summaries were wrong and did not reflect what the stakeholder was actually saying. The information provided under comment "themes" was frequently incorrect.

3) **Clothianidin petition comments:** the comment summaries were too vague and do not capture the concerns of the stakeholder. In some cases, the comment summary did not reflect what the commenter was saying at all. The themes identified for each comment were frequently incorrect. A number of substantive comments were not captured due to programming errors.
    - In response to quality concerns, PRD actually held a training for Artic Slope in February 2020, and provided background on what we do, how we approach comment review, and went through several comment examples. We also reiterated that comment summaries should capture "the ask" from the commenter.

4) **Pyrethroids eco risk mitigation proposal comments:** the themes identified were still frequently incorrect, the comment summaries/abstracts did not provide an adequate level of detail and does not capture "the ask" from

the commenter. Despite the training that we held, we were still seeing the same quality issues observed before.

Here is **what I think the contractors can do for us**:

- download the comments and load them in a central location,
- provide a count of the number of comments received (regulations.gov can give us the count as well),
- organize the comments received into an xcel and provide metadata such as: the name of the commenter, the organization, the docket ID of the comment, links to the comment and the comment attachments, the number of attachments submitted with the comment and the number of pages for each attachment.
    - It is worth noting that metadata such as the name of the commenter, organization, docket ID, and links to comment can be exported directly from regulations.gov into an xcel, but only once all comments are posted in regulations.gov. However, Artic Slope can do this as comments come in, so we don't have to wait until after all comments are posted.
- Artic Slope can loosely sort comments into substantive vs. not substantive bins, however their definition of "substantive" is loosely any comment with an attachment or any comment that comes from an organization.

Ex. 5 Deliberative Process (DP)

Kelly:

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