

Data Quality Record for Long-Term Performance Goals

Long-Term Performance Goal Text: By September 30, 2026, assess and consider environmental health information and data for children at all life stages for EPA actions that concern human health.

Corresponding Annual Performance Goal: Number of EPA actions that concern human health that include assessment and consideration of environmental health information and data for children at all life stages to the extent relevant data are available.

Goal Number/Objective: Cross-Agency Strategy 2

NPM Lead: Office of the Administrator (OA), Office of Children’s Health Protection (OCHP)

1a. Purpose of Long-Term Performance Goal:

The intent of this long-term performance goal (LTPG) is to demonstrate improvement in complying with the EPA’s [2021 Policy on Children’s Health](#), which calls for EPA to protect children from environmental exposures by “consistently and explicitly considering early life exposures and lifelong health in all human health decisions.”

To achieve this purpose, eight (8) national program offices at EPA (Office of Chemical Safety and Pollution Prevention, Office of Water, Office of Air and Radiation, Office of Research and Development, Office of Enforcement and Compliance Assurance, Office of Land and Emergency Management, Office of Environmental Justice and External Civil Rights, and Office of the Administrator, hereafter “Offices”) will increment over time and to the extent relevant data are available, the number of EPA actions that have a human health impact for which children’s environmental health information and data at all life stages was considered and assessed.

This LTPG was new for the EPA in 2022, and data collection and reporting began in FY 2023. Progress will be monitored quarterly, and modifications will be made to improve the frequency and depth in which children’s environmental health is considered and assessed. A positive trend in this long-term performance goal will convey an increase in EPA’s use of data and information to make decisions to protect children’s environmental health.

1b. Performance Measure Term Definitions:

Per EPA’s *2021 Policy on Children’s Health*, Offices are to consistently and explicitly consider early life exposures and lifelong health in all human health decisions. This expectation translates into Offices assessing and considering children’s environmental health information and data in the process of making decisions. For purposes of this LTPG, only headquarters offices are participating; EPA regional offices are not included in this reporting.

The term “EPA actions” includes any activities subject to the Action Development Process (ADP) such as proposed rules, final rules, and significant implementation guidances that are identified as having human health impacts. Updates have been made to the ADP tracking system (called the EPA Action Management System or EAMS) to facilitate data collection for this LTPG.

In addition, the term “EPA actions” includes scientific and technical analyses, research products, and other activities that program offices undertake that include consideration of children’s environmental health at any life stage or lay the foundation for the later consideration of children’s environmental health. In other words, EPA actions for this LTPG include activities at any stage in the development of a product or final decision, such as early research and analysis, proposed rulemaking, and outreach, that advance the protection of children’s environmental health.

Both internal and external activities count toward this LTPG. External activities refer to actions that become public information. Examples of external activities include a webinar for children’s environmental health stakeholders on the impact of a final rule; a grant solicitation to focus on children’s health considerations; a research product that addresses a key children’s environmental health research gap; a training for pediatricians/community health care providers servicing children at risk. Internal activities refer to actions taken that remain internal to EPA and are not communicated to the public. Examples of internal activities include an additional hazard analysis on a key children’s environmental health endpoint done to inform future rule options or regulatory decisions; a training course offered to employees to increase employee understanding of children’s environmental health topics; or internal memoranda.

The term “children at all life stages” in this LTPG comes from the *EPA’s 2021 Policy on Children’s Health*. Generally, by “children at all life stages” EPA refers to exposure during early life stages (conception, infancy, early childhood, adolescence until 21 years of age) as well as resulting effects that occur during early life or manifest themselves in adulthood or in later generations. For purposes of this LTPG, EPA commits to incrementally improve the extent to which it assesses and considers all life stages in its actions. This does not mean that all actions identified under this LTPG will consider children at all life stages; rather, this means that EPA is committed to making progress toward considering children at all life stages by attempting to do more than the previous year to meet this goal. For instance, an Office that considered exposure data for breastfed infants may the next year commit to consider the literature on reproductive and developmental toxicity in the analysis of a particular pollutant the following year. The specific approach that an Office takes in assessing and considering children’s environmental health at all life stages will depend on the applicable statute(s), chemical(s), or pollutant(s), health effects, uses, and exposed populations and life stages and the extent to which relevant data are available.

To “assess and consider children’s environmental health information and data” means that the Offices consider children’s environmental health in relevant steps of the ADP as described in the [ADP Guide to Considering Children’s Health When Developing EPA Actions](#); and/or consider relevant input from peer reviewers, including from the [Children’s Health Protection Advisory Committee](#); and/or consult and consider relevant input from the designated Children’s Health Program Champion in each Office and/or from the Office of Children’s Health Protection. Whether and how an Office considered children’s environmental health information and data should be documented. Questions to consider include:

- Are infants, children, adolescents, and pregnant or nursing women, for instance, likely to be exposed?
- Do children have increased prevalence of or vulnerability to known health effects (i.e., affecting their growth and development)?

- Are there known or suspected developmental or reproductive endpoints associated with the hazard, or latent effects in adulthood from early life exposure?
- Is the focus of the assessment part of a larger class of compounds that may contribute to cumulative effects on children's health?
- Are there significant community concerns that influence the perception of children's health concerns?

1c. Unit of Measure:

The number of EPA actions.

2a. Data Source:

To set the baseline and first year target, EPA asked the Offices to identify actions having children's environmental health impacts that they commit to complete by the end of FY 2023. (Note: at the time of baseline and first year target setting, the Office of Environmental Justice and External Civil Rights was not yet created, and environmental justice actions were reported under the Office of the Administrator). At the end of each quarter, Offices report results to the LTPG lead, meet to summarize the actions completed, and share information about how children's health was considered. Offices will include both quantitative results (i.e., how many actions were completed) and qualitative results, which are more meaningfully related to implementation of EPA's *2021 Policy on Children's Health*.

In subsequent years, EPA will use the same approach for Office-specific action target-setting and consolidated reporting of results. EPA is committed to making progress toward considering children's health at all life stages in agency decisions by attempting to do more than the previous year to meet this goal.

2b. Data needed for interpretation of (calculated) Performance Result:

The target for FY 2023 was 163 actions that concern human health that include assessment and consideration of environmental health information and data for children at all life stages to the extent relevant data are available. This will serve as the baseline for this measure. Note that an action may be counted if an Office assessed and considered children's environmental health data, even if the ultimate action is different. Example: during the rulemaking process, data on pregnant women was reviewed and an option was presented to protect pregnant women differently. However, the Administrator decided to select a different option.

3. Calculation Methodology:

Each year, EPA will consolidate the results from the eight reporting Offices and compare the results against the annual target set at the beginning of the fiscal year. These consolidated agency-level annual data (in the form of number of actions/activities) will be reported externally.

4. Quality Assurance/Quality Controls:

At the end of each fiscal year, the reporting Offices and OCHP will meet to provide and discuss feedback to improve on the LTPG's ability to achieve its intended outcome. To ensure data quality, OCHP will set up a Microsoft Teams channel to collect information from Offices and to report on progress during the year.

5. Data Limitations/Qualifications:

This data assumes that Offices report accurate and truthful information. Additionally, questions may arise regarding how to comply with the requirement to “assess and consider children’s environmental health information and data.” Additionally, OCHP’s ability to work with the Offices may be constrained by limited resources. Guidance will be provided in a timely fashion as questions come up and regular meetings will be set up to permit adequate discussion of challenging implementation topics.

6. Technical Contact:

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7. Certification Statement/Signature:

I certify the information in this DQR is complete and accurate.

DAA Signature Original signed by Wesley Carpenter **Date** 5/3/2024