



# Community Involvement Plans

## Overview

A community involvement plan (CIP) is a site-specific strategy to enable meaningful community involvement throughout the Superfund cleanup process. CIPs specify EPA-planned community involvement activities to address community needs, concerns, and expectations that are identified through [community interviews](#) and other means.

The CIP is both a document and the culmination of a planning process.<sup>1</sup> As such, the CIP represents the backbone of the site's community involvement program and serves as an informative guide for community members. A well-written CIP will enable community members affected by a Superfund site to understand the ways in which they can participate in decision-making throughout the cleanup process. It also can be a useful reference for the site team during the Superfund cleanup regarding appropriate activities for community involvement.

## Why This Is Important

This is important because the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) requires the lead agency to prepare a community involvement plan (formerly called a community relations plan) “based on community interviews and other relevant information, specifying the community relations activities that the lead agency expects to undertake during the remedial response.” The NCP specifies that the CIP must be in place before remedial investigation field activities start, “to the extent practicable.” [NCP 40 CFR §300.430(c)(2) (ii)(A-C)].

The NCP further requires that EPA review the CIP prior to initiating the remedial design (RD) “to determine whether it should be revised to describe further public involvement activities during remedial design/remedial action (RD/RA) that are not already

This and all tools in the Community Involvement Toolkit should be used in conjunction with the [Community Involvement Handbook](#), which provides guidance to EPA staff on how EPA typically plans and implements community involvement activities at Superfund sites.

addressed or provided for” in the CIP. [40 CFR §300.435(c)(1)].

For removal actions lasting 120 days or more, the NCP specifies that the lead agency must prepare a CIP based on community interviews and other relevant information “by the end of the 120-day period.” For removal actions with a planning period of at least six months, the NCP requires the CIP to be completed prior to the completion of the engineering evaluation/cost analysis (EE/CA). [40 CFR §300.415(n)(3)(ii)].

These requirements are equally applicable to federal facilities and sites using the Superfund Alternative Approach (SAA).

## Implementation

A CIP is a community-oriented document that provides an accessible road map for community involvement throughout the cleanup process. While the community involvement coordinator (CIC) has primary responsibility for the CIP, all members of the site team — the remedial project manager (RPM) or on-scene coordinator (OSC); CIC; risk assessor; the enforcement case team; EPA contractor; state, tribal, or local agency staff; or others — should be involved in the development and implementation of the CIP.

The CIP should be a “living” document and is most effective when it is updated or revised as site conditions change. The CIP document:

- Describes the release and affected areas (a.k.a., “the site”), including relevant history, type and extent of contamination, and environmental

<sup>1</sup> Hellier, Justin, Planning for Participation: Trends & Opportunities in Superfund's Community Involvement Plan, 2010: Report prepared for the U.S. EPA by National Network for Environment Management Studies Fellow. Many of the ideas for this tool were informed by this report.



exposures and concerns, both related to the site and in a broader sense. If possible, the CIP also should take a holistic look at environmental exposure and concerns (including contamination and other community stressors that may not be related directly to the Superfund site).

- Describes the community in a comprehensive [community profile](#) that includes demographics, local government structure, local economy, community assets, and any relevant community characteristics.
- Identifies key community needs, questions, and concerns, as well as expectations and unique needs of the community (e.g., translation and disability services) or unique cultural behaviors, customs, and values. This information is typically collected through community interviews and depicted in the community profile.
- Describes the need for technical assistance services and, if appropriate, identifies appropriate programs and mechanisms for providing access to technical assistance for communities. (See [Summary of Technical Assistance](#) tool.) Consider if the timing of a [technical assistance needs assessment](#) (TANA) is appropriate for the community. The TANA can be conducted concurrently with the initial community interviews administered for development of the CIP.
- Defines the decision-making process, including decision points that do or do not involve public input during the Superfund cleanup process. This includes activities early in the Superfund process through which EPA communicates possible cleanup options, so the community is aware of EPA's direction.
- Outlines a comprehensive plan to address community needs, concerns and expectations, and specifies EPA's planned outreach activities and community involvement mechanisms, including a projected sequence of project milestones tied to site activities (with projected timeframes, whenever possible). It also describes the mechanisms that will be used to explain to the public how community feedback is considered during the cleanup process.
- Identifies approaches to reach or engage the community and any additional special services or approaches EPA will use to address unique needs of the community. This may include encouraging the formation of a [community advisory group](#) (CAG), providing facilitation/conflict resolution/alternative dispute resolution (ADR) services for community meetings or groups, translation

services, or supporting an approach for community visioning (e.g., allowing open-ended brainstorming for community stakeholders to envision the future potential reuse of the site).

- Allows for community comment on the draft CIP and describes the mechanisms used to receive and consider feedback before issuing the "final" CIP (e.g., formal or informal public comments, community meetings, or public meeting).
- Describes future plans for updating or revising the CIP.

## Developing the CIP

Start the process of developing your CIP several months before the remedial investigation field activities begin, or, for removal actions, before the end of the 120-day period. The level of effort involved and the amount of time required to prepare a CIP will depend on many factors, including the size, complexity and current stage in the cleanup process; the number and diversity of affected residents and community groups; the level of community interest; and the potential contentiousness of issues regarding the site.

A CIP developed early in the cleanup process for a community with a high level of interest in site issues will usually be larger in scope and detail than a CIP that is being revised in the latter stages of the cleanup process (including the five-year review), or in a community whose residents have demonstrated little or no interest in the site. Similarly, a CIP written for a small site that involves few community involvement challenges is likely to be less complex than a CIP for a large site with contentious or complicated technical issues and many community groups with special needs and concerns. While the level of effort required to develop a CIP is difficult to estimate because of these variations, it is not unusual for preparation of a CIP for a relatively complex site or a site with contentious issues to require 200 hours of team effort over several months.

In any case, the CIP should begin planning for the CIP early. The process will involve planning for, conducting, and analyzing community interviews; preparing the community profile; coordinating with all site team members about community involvement goals and objectives; and writing the CIP. You should factor in time to allow the site team to thoroughly review drafts of the CIP. Also, allow time for local agency input, if applicable, and for soliciting and



incorporating community comments on the draft CIP before it is finalized.

Start by scheduling a planning meeting with the RPM or OSC and other members of the site team, including local agencies and the contractor, if appropriate. Consider your community involvement goals at the site, how you plan to use the CIP, and what its scope ought to be. Prepare a worksheet to help develop the CIP. Define the roles and tasks assigned to each member of the site team (including the contractor, if there is one for the site). In addition, assess the role your community involvement manager plays in the preparation, review, and approval of the CIP. (A sample worksheet for developing a CIP is included in Attachment 1.)

CICs sometimes are supported by EPA contractors who assist with portions of the CIP. Use your contractor support wisely. The contractor generally can do much of the background demographic research for the community profile, prepare contacts lists, and help with scheduling of community interviews.

Conducting community interviews is a critical part of producing a CIP. Interviews are a valuable way to hear directly from community members about their issues, concerns and perspectives about being informed and involved. They also are an opportunity to begin building or strengthening relationships in the community and to create open lines of communication. It is strongly recommended that community interviews be conducted by EPA staff. Community interviews should be led by the CIC, preferably accompanied by the RPM or OSC. This will provide an opportunity for community members to meet the RPM or OSC and will allow the site's RPM or OSC to hear directly from community members about their needs, expectations, questions, and concerns related to the site. In the limited cases where contractors are used to conduct interviews, they should be accompanied by EPA staff.

### Describing the Community

A good CIP starts with good information about the community. You can obtain this information from the community profile and community interviews, as well as through your experience around the site, interactions with members of the public affected by the site, and insights from the site team. In some cases, you also may be able to obtain information from local and state agencies that have worked with the site and the affected community. The site team should

become aware of whether a community may have disproportionate burden of exposure or environmental health effects due to race, national origin, or income compared to other communities located nearby (i.e., issues related to environmental justice). In particular, you should collect, analyze, and summarize information about:

- **The site:** Its history and the key issues related to site contamination and the cleanup effort.
- **The community:** Key demographic information about the affected community and identification of stakeholder groups, community organizations and institutions, community leaders (both official and unofficial), local government agencies, and media and communications outlets. Include relevant information about the local economy, community assets, and special needs (such as translation services) for segments of the community.
- **Community needs, concerns and expectations:** Issues of concern to residents, identified through community interviews, informal discussions and interactions with residents and stakeholder groups, local media reports, and other insights about the affected community. Key issues of concern to the local community may include perceptions and opinions of EPA and the cleanup process; how people want to be kept informed (i.e., mechanisms to deliver information) and be included in the decision-making process; what are perceived barriers to effective participation; whether there are other sources of pollution that affect the community (see text below); and whether there are past experiences of mistrust or any unique concerns. You also can use this information to assess whether some groups face unique exposure scenarios (e.g., fish consumption patterns) or whether they experience or perceive that they have unequal access to the decision-making process (i.e., issues relating to environmental justice). Use this information later — in the CIP action plan — to recommend any special services, including technical assistance, formation of a CAG, facilitation/conflict resolution/ADR, or translation services, that might be needed. If your community research identifies significant conflict or adversarial activities related to the site, you may wish to determine whether a third-party conflict or situation assessment should be conducted.

Although the CIP focuses on the Superfund cleanup process, you should be aware of the other environ-



mental issues beyond the site that could affect how community involvement is conducted or received by the community — particularly concerns about environmental justice. Find out whether there are other regulated hazardous waste facilities or environmental programs administered by EPA or the state in the community. It also is useful to check for any ongoing EPA, state, or tribal enforcement actions nearby that might affect community attitudes towards EPA and state regulatory programs. Bringing local government agencies to the table during the planning phase of the CIP can provide local knowledge of existing environmental concerns in the community at that time, as well as other insights. Work closely with your RPM or OSC to determine whether any scientifically sound health studies exist that provide information about other environmental exposures to the population. It also may be useful to consider social and economic impacts of the Superfund site and cleanup actions and what the community's thoughts are regarding future redevelopment at the site.

This “big picture” information is extremely useful for developing an effective plan for Superfund community involvement. However, if you choose to identify issues beyond the scope of the Superfund program, you should clearly explain in the CIP that issues not directly related to Superfund cleanup cannot be addressed through the Superfund authorities, nor can EPA use its Superfund authorities to compel potentially responsible parties (PRPs) to address these other issues. Nevertheless, the site team should align in a strong collaborative relationship with people inside and outside the Agency to help the community identify EPA contacts or contacts at other government agencies for community concerns outside the scope of the Superfund program. The CIP may be useful in identifying resources to address such community concerns.

### Preparing the Action Plan

The next step is to develop the action plan for the site. The action plan is a site-specific approach to meet specific community involvement objectives identified by the site team. CICs should use the information collected about the site and the affected community, along with what has been learned through community interviews and from other sources, to develop an action plan that addresses the community's needs, concerns, questions, and expectations, as well as their communications styles and preferences.

The action plan:

- Defines community involvement objectives for the site, including the points in the decision-making process that do and do not involve community input. Describes level of participation that EPA is seeking (to inform the community, seek consultation from the community, or actively involve the community in site decision-making) at various points in the process and describes how community input will influence the decision-making process. The level of participation will be unique for each site. (For a tool to help site teams define various possible levels of involvement, see Attachment 2: *International Association of Public Participation's (IAP2) Spectrum of Public Participation*.)<sup>2</sup>
- Describes the decision-making process and identifies key opportunities for public input during the Superfund cleanup process. This includes significant milestones and a proposed sequence for community involvement activities (e.g., the points in the cleanup process at which specific activities are likely to occur). This language should also reaffirm that community stakeholders sometimes have important information to provide in characterizing the site and developing cleanup solutions.
- Outlines a comprehensive plan that describes how future EPA activities will address identified community needs, concerns, questions and expectations regarding site cleanup and how EPA will communicate with the public. This includes specifying any special services (including technical assistance, facilitation/conflict resolution/ADR, or translation services) or recommending formation of a CAG to address specific community needs.
- Identifies appropriate communications methods, forums and opportunities for public input, consultation and involvement in decision-making during the Superfund cleanup process (e.g., the need to translate documents, partner with specific community organizations/leaders, use specific media outlets for outreach, or hold meetings at a specific community location).

### Putting it All Together: Writing the CIP

Now that you've described the community and developed the action plan, it is time to put the information

<sup>2</sup> Note that IAP2's spectrum includes five levels of participation, with the first four appropriate for Superfund cleanups. (The fifth level of public participation on the spectrum extends beyond what EPA can offer at Superfund sites, since EPA cannot delegate decision-making by placing decisions entirely in the hands of the public.)





together in a way that will be useful to the target audiences for the CIP. Of course, the community is the primary audience for the CIP. In addition, you — as the CIC — are a target audience, as are future CICs, the RPM or OSC, the enforcement case team, and other members of the site team. Other audiences include the PRPs and other federal, state, local, and tribal agencies involved in the cleanup.

**The purpose of the CIP is *not* to provide technical answers to the community's questions. The CIP is EPA's plan for informing and involving the community in the cleanup process.** In some cases, particularly when the CIP is updated or revised for a five-year review or where community interest is minimal, a short CIP outlining EPA's plan for community involvement may be all that is needed. For most sites, the CIP should be written to address members of the community directly in a way that shows EPA's commitment to listening to their input and inviting their active involvement at each stage of the Superfund cleanup process.

While there is no standard or required outline for a CIP, it should be written to allow readers, particularly members of the community, to understand: (1) the Superfund cleanup process; (2) how, when and where EPA will provide site-related information to the public; (3) how the public can be actively involved in the cleanup process; and (4) the key points in the cleanup process and the ways in which EPA takes public input into consideration during interim and final decisions. The CIP can be a powerful way to communicate EPA's commitment to listening and responding to community concerns and providing timely information and opportunities for community involvement.

There are many ways to organize the basic elements of the CIP in a user-friendly document that will do more than sit on the shelf of the local [information repository](#). The order in which you present the information in the CIP is critical: the most important information should be presented clearly and concisely early in the document, perhaps in an overview or summary. Keep in mind that presenting too much data and background information early in the document could be intimidating or fatiguing for the reader.

Generally, CIPs contain the following key elements:

**Site Description:** A description of the site, its history, and the key issues related to site contamination and the cleanup effort.

**Community Profile:** A description of the affected community, including a summary of demographics and identification of significant subgroups in the population, languages spoken, and other important characteristics of the affected community, such as whether the site is located in an area with environmental justice concerns. It also should include information about how the profile was derived. (See the Community Profiles tool.)

**Community Needs and Concerns:** A summary of community concerns, needs and expectations identified from community interviews and through other communications and experiences with the community. This section of the CIP is EPA's opportunity to communicate what we heard and understood from the community. Identify major concerns (or themes) that emerge. You can present quotes from community interviews, but you should not identify the interviewee. It should include a discussion of:

- The community interviews conducted, including the number of interviews and how interviewees were selected or how they represent the various groups in the community, along with a summary of the findings from these interviews. (See Community Interviews tool.)
- Other sources of information about community needs and concerns and what was learned from these other sources.
- Other related, but not necessarily Superfund site-specific environmental or health issues affecting the community, particularly any other EPA programs that may be operating in the community (optional, but recommended, if appropriate) and other environmental exposures documented in existing, scientifically sound health studies. If this discussion is included, clearly explain that only Superfund-related issues can be addressed through the Superfund cleanup. However, the CIP can identify resources to meet such community concerns, such as identifying contacts or programs at EPA or other governmental agencies.

**Action Plan:** EPA's planned outreach and community involvement activities tied to site activities. This section should include:

- A sequence of activities tied to milestones in the Superfund cleanup process (preferably with anticipated timeframes).
- Appropriate channels for reaching the community and offering opportunities for input from



the community (e.g., EPA's webpage for the site, news media and other communication mechanisms through which community members obtain site-related information, community groups, community leaders, local elected officials, social media applications).

- Recommendations for addressing identified community needs, including providing facilitation or conflict resolution assistance, using translation services, encouraging formation of a CAG, or offering technical assistance or other services to the community, as appropriate. The CIP also can identify the need for specific community involvement tools and techniques to address specific concerns and issues (e.g., preparation of additional fact sheets on specific topics).
- The location of the information repository.
- References to additional existing information about the site that may answer people's concerns, such as past human health risk assessments, or fact sheets.
- Possible locations for public meetings or other site-related community involvement activities.
- Discussion of how community feedback was or will be collected and used to develop and revise the CIP and places where the CIP will be housed or available for viewing.
- Discussion of when and how the CIP will be updated or revised.
- Sources of other relevant information, as appropriate, as well as identification of emergency response notification systems (text and email notification systems operated by local government) and identification of appropriate places to post notices (physically through signage, for example, and electronically on specified websites).

**Contact Lists:** A reference listing of contacts (name, address, phone, email) useful for the community or the site team. Consider whether permission should be obtained before including contact information for some of the people listed. This may go into an appendix, especially if it's likely to be revised regularly, and should include contact information for:

- The site team.
- Community groups and community leaders.
- Local elected officials.
- Local, state, tribal, and federal agency staff relevant to the site.
- Media contacts (including social media outlets and citizen journalists).
- Others, as appropriate.

**Optional Elements:** As appropriate for the site and community, you may wish to include other elements to the main body or as appendices, such as:

- Overview/Summary (if the CIP is relatively long).
- Glossary of Superfund terms.
- Criteria for assessing how well the CIP is being implemented.
- Graphics that visually present the Superfund cleanup process.
- Relevant photographs and visual schematic of the site.
- Communication strategies addressing specific issues, such as a [\*risk communication\*](#) strategy.
- Other sections added on a site-specific basis.
- References or links to relevant existing site information.

### Community Review and Comment on the CIP

To ensure the CIP is indeed informed by the community, consider sharing a draft with the community and inviting its input and feedback along the way. The best CIPs offer a clear invitation to the community for feedback before they are finalized. Describe the procedure for eliciting and responding to comments from the community in the draft CIP.

Community comments can improve the quality of the CIP by ensuring that it is flexible and community-specific. Comments also may correct errors or add information that may have been missed in the community interviews. Perhaps the greatest benefit of inviting community comment on the draft plan is that doing so helps build credibility and trust by modeling EPA's commitment to open, transparent, two-way communication and reinforcing the Agency's commitment to involving the community in the cleanup process.

Describe the ways in which EPA will collect and use the community's feedback on the draft and outline the anticipated timeframe for finalizing the CIP. (Here you should spell out the ways in which you plan to seek or accept public comments on the draft — such as via written comments, a website, a public meeting or community meetings — and what you plan to do with the comments that you receive (e.g., incorporate them into the final draft or prepare a responsiveness summary.)) It is not generally necessary to hold a public meeting or prepare a responsiveness summary for public comments on the CIP, but you should explain the specific procedures you have chosen



to solicit and consider community feedback on the draft CIP.

Also explain how you plan to distribute the final CIP and how and where you will make it available to the community. At a minimum, the CIP must be available in the information repository. In keeping with EPA's move toward taking advantage of electronic media, the CIP also should be placed on EPA's website (usually the site-specific website).

### Updating or Revising the CIP

The NCP says that the CIP should be reviewed prior to the initiation of the remedial design to determine whether it should be revised to describe further public involvement activities. There is no standard rule about when to update or completely revise the CIP. Because the CIP should be a living document that is referred to regularly, information usually will be continuously added or updated. Often, all that is necessary is updating contact information, media and elected officials lists, and other reference materials that usually are included as appendices in the CIP.

However, a comprehensive revision of the CIP sometimes is necessary. This involves much more than updating lists of contacts and other reference materials; it requires taking a fresh look at community needs and concerns (usually by conducting another round of community interviews), reassessing EPA's community involvement approach, and revising EPA's site-specific action plan for community involvement accordingly.

Even as you prepare an initial CIP, it is a good idea for you and the other members of the site team to think ahead and define — to the extent possible — the points in the Superfund cleanup process at which a comprehensive CIP revision might be warranted. This is important for planning purposes, so the RPM or OSC can budget for the effort at the appropriate time, and because the CIP should include a short discussion about EPA's plans for its revision.

In remedial actions, updates or comprehensive CIP revisions may be undertaken at specific benchmarks in the cleanup process, such as after a record of decision (ROD) is signed, at explanations of significant differences (ESDs) or ROD amendments, before the remedial action has begun, at remedial action project completion, or at initiation of the five-year review. Others are updated or revised according to a timetable, such as every three or five years.

The decision to undertake a comprehensive revision of the CIP sometimes is made based on a change in the level or nature of community interest. When there is a high level of interest at a site, the CIP should be revised regularly so that the document continues to reflect current conditions and community interests. On the other hand, it may be time to conduct a comprehensive CIP revision when community interest has waned over a long period of time. It also may be appropriate to revise a CIP after significant demographic, economic, or political change in the community. A CIP revision is in order when CICs believe that a change to strategy for involving the community may be necessary.

### CIPs at Federal Facilities: EPA's Role

Because other federal agencies have lead cleanup authority at federal facilities, such as active and closed Department of Defense (DoD) installations and Department of Energy (DOE) sites, the agencies also have the lead for CIPs for these sites. At federal facilities, the role of the EPA CIC changes from “doer” to “reviewer” when CIPs are created, updated, or revised. The keys to successful community involvement at federal facilities include cooperation between EPA and the responsible federal agency and prompt, effective communication among these agencies and the local community. The NCP, CERCLA, EPA's [\*Superfund Community Involvement Toolkit\*](#), EPA's [\*Superfund Community Involvement Handbook\*](#) and web resources, coupled with EPA's “early and meaningful community involvement” guidance, authorize the role of the CIC at federal facilities.

EPA's CIC should be present at community interviews and review the federal facility's draft CIP, ensuring federal-facility CIPs are as rigorous as EPA fund-lead and PRP-lead sites. EPA's CIC should be prepared to play a leading role in making sure the CIP for a federal facility addresses the community's needs, concerns, and expectations and clearly explains the federal facility's plans for involving the community.

The initial CIP is a document that has strict negotiated review timeframes that trigger actions when deadlines are missed. This means that the CIC should carefully review the federal facility CIP to ensure that it includes a sequence of outreach and community involvement activities with timeframes tied to the current site management plan. However, CIP updates or revisions may not be tracked using the same strict approach, so many years sometimes pass between CIP revisions. The EPA CIC should coordinate with



the federal facility counterpart to ensure that the CIP continues to be a “living document” that addresses community needs.

### **CIPs at Sites Using the Superfund Alternative Approach: EPA’s Role**

The SAA is employed at sites that are NPL-caliber but are not listed on the NPL. Often, sites using the SAA are proposed to the NPL but not finalized. Cleanup work at such sites is performed by a PRP under a settlement with EPA and is expected to be equivalent to work performed at an NPL site. Accordingly, the CIP at such sites should be prepared in the same manner as at a typical NPL site.

One key difference between NPL sites and sites using the SAA is that the community would not be eligible

to apply for a technical assistance grant (TAG) if the site is not proposed to the NPL. (TAGs are available only for sites that are on the NPL or proposed for listing on the NPL.) In such cases, a provision typically is included in the SAA settlement requiring the PRP to provide technical assistance plan (TAP) funding to replace the TAG and provide the same benefit to the community. (See the [\*Summary of Technical Assistance\*](#) tool.) The CIC should work with the PRP to make the community aware of the availability of TAP funding. In addition, the CIC should include a discussion of obtaining the TAP funding in the site’s CIP. Although the TAP agreement is between the community and the PRP rather than the community and EPA, the CIC and site team should be involved in reviewing and implementing the agreement.

### ***Community Involvement Plans and Personally Identifiable Information***

Personally identifiable information (PII) of relevant stakeholders, such as names, email addresses, and home addresses or telephone numbers, may be obtained while developing a community involvement plan (CIP). This is likely to occur during the community interview process or if a mailing list containing community member contact information is obtained. It is important to remember that PII obtained from community members should not be released or appear in any public document, nor should information be included that will allow others to deduce the identity of any individual. Therefore, any quotes used from community interviews should not be attributed to the specific interviewee, and mailing lists should not be included as an appendix to the CIP.

General EPA policy regarding the collection and release of PII consists of the following:

- In general, sign-in sheets and mailing lists are subject to EPA’s Privacy Policy. As a result, EPA staff typically should consult with the Office of Regional Counsel or Office of General Counsel before determining whether to disclose or withhold the information. A FOIA request may be required.
- If a FOIA request is received, it is possible that some personal information, such as names, could be released to the FOIA requestor. The personal privacy exemption under FOIA (exemption 6) may often apply, and after balancing the personal privacy interests against public interest, EPA may determine that some PII should not be released. Release of PII for FOIA requests is determined on a case-by-case basis, and EPA programs should consult with their FOIA office or counsel when making this determination.

To clarify the collection and release of PII for community members, please consider displaying the following disclaimer language on public sign-in sheets, public mailing lists, or any other time when PII is collected:

*The information you provide here is subject to EPA’s [Privacy Policy](#) and may be disclosed consistent with federal laws and regulations, including under the Freedom of Information Act. EPA’s Privacy Policy should not be confused with the Privacy Act, which generally does not cover sign-in sheets and mailing lists but may cover other collected information.*

*If collected information is subject to the Privacy Act, please follow the procedures outlined in the system of records notice, including any requisite disclaimer language.*





## CIPs at State-Lead Sites: EPA's Role

In some Regions, a state can have the lead role for a Superfund site. The state is responsible for writing and updating the CIP at such sites. At state-lead sites, the EPA CIC should be familiar with the state's CIP for the site and respectful of the state's lead role. CICs should work with the state and consult the state's CIP when planning EPA's outreach and community involvement activities.

EPA's activities should be planned and conducted in a way that is consistent with the state's CIP, mindful of existing relationships and methods of communicating site information. Not only is this important for good coordination, it also allows EPA to take advantage of the state's experience working with community groups and building effective outreach mechanisms.

## Tips

- Write the CIP in a way that not only tells the community about community involvement but also acts as an invitation to community members.
- Write simply. Use active voice, plain language, and positive messaging to clearly communicate ideas.
- Communicate the most critical information early in the document. Avoid language and information overload that would discourage the reader from finishing the document or from participating in the public participation process. Too much data and background information presented early in the document could be intimidating to the reader.
- Make the CIP accessible to the community. The CIP should not be a lengthy document. If it is long, prepare a separate fact sheet summarizing highlights. Use plain language and avoid technical jargon, long sentences and scientific details. The document should be clearly organized and visually appealing. Simple graphics and photos also can be helpful additions.
- Use text boxes and graphics effectively to highlight important information. Include a flowchart of the Superfund cleanup process, maps and photos of the site, and links to useful websites.
- Include contacts lists and other reference information that change often in an appendix rather than in the body of the CIP. This will make it easier to update often.
- If appropriate, create a simple matrix showing key stakeholder groups and the information of greatest

interest to them. This can help ensure that stakeholder groups receive the information of greatest use to them.

- Incorporate flexibility for basic updates (e.g., updates to contact lists) and for ongoing appraisal and modification, such as instructions for planned review and a process for revising the CIP as necessary in response to changes at the site or changes within the community.
- If appropriate, include extensive glossaries to help readers understand technical terminology and the Superfund cleanup process. If you include a glossary, take entries from the official EPA glossary, "[\*Terms of Environment: Glossary, Abbreviations and Acronyms\*](#)," which is updated periodically. (Note: [\*A Spanish-language glossary of Superfund terms\*](#) also is available.)
- If a contractor helps prepare the CIP, be sure that the CIC receives all deliverables; nothing should go directly from the contractor to the RPM or to the community.
- If languages other than English are spoken in the community, consider the need for translation.
- Develop a plan for evaluation of the CIP. Define how to determine the effectiveness of the CIP and whether activities are reaching appropriate audiences and how to determine if the intended audience is satisfied with the information sharing and opportunities for involvement.
- Ensure adequate distribution of the final document. Place the CIP in the information repository and on EPA's webpage for the site. Provide it directly to partners and community groups. Consider sending a postcard to the site's mailing list and an email to the electronic distribution list, announcing availability of the CIP. Also consider bringing CIP copies to local meetings and other distribution points.
- If applicable, use a binder with a spine that can receive a label identifying the hard copies of the CIP. Plastic binders that do not accept a spine label are difficult to find in the information repository.

## Attachments

- Attachment 1: *Sample Worksheet for Developing a CIP*
- Attachment 2: *IAP2 Spectrum of Public Participation*



## Attachment 1: Sample Worksheet for Developing a CIP

### Section 1 Community Involvement Goals and Objectives

#### Goal 1:

The objectives to meet this goal are:

Objective 1:

Objective 2:

Objective 3:

#### Goal 2:

The objectives to meet this goal are:

Objective 1:

Objective 2:

Objective 3:

#### Goal 3:

The objectives to meet this goal are:

Objective 1:

Objective 2:

Objective 3:



## Section 2 Timeline of Activities to develop the CIP Action Plan

Timing	Tasks	Lead or Forum

## Section 3 Roles and Responsibilities of EPA Site Team, Local, State, Tribal, & Federal Agency Staff Relevant to Site, and Contractor

Position	Name	Email	Telephone #	Major Responsibilities

## Section 4 Contact Information of Interested Parties (Community Groups, Community Leaders, Local Officials, Media Contacts, and others, as appropriate)

*Document when you get permission to use contact information in CIP and the resource the person provides in the 'Notes' area.*

Position	Name	Email	Telephone #	Address	Notes



Attachment 2: IAP2 Spectrum of Public Participation

Public Involvement Spectrum

<p><b>OUTREACH</b></p> <p><b>Purpose:</b> To provide information (Information flows in one direction – from EPA out.)</p> <p><b>Promise:</b> We will keep you informed</p> <p><b>Types:</b> Website Fact Sheet Phone Hot Line Federal Register Notice Press Release</p>	<p><b>INFORMATION EXCHANGE</b></p> <p><b>Purpose:</b> To provide &amp; exchange data, opinions and options</p> <p><b>Promise:</b> We will listen, acknowledge your concerns &amp; aspirations, &amp; provide feedback on how your input influenced our decision</p> <p><b>Types:</b> Meetings with Individuals Public Meeting Focus Groups Listening Session Availability Session</p>	<p><b>RECOMMENDATIONS</b></p> <p><b>Purpose:</b> To obtain useful &amp; influential advice or comments</p> <p><b>Promise:</b> We will take your advice or comments into account when making a decision</p> <p><b>Types:</b> Advisory Committee Scoping Session Policy Dialogue Task Force Joint Fact-Finding</p>	<p><b>AGREEMENTS</b></p> <p><b>Purpose:</b> To reach workable agreement or settlement</p> <p><b>Promise:</b> We will work in good faith to reach an understanding that we all can support &amp; we will implement it as agreed</p> <p><b>Types:</b> Statement of Principles Negotiated Rulemaking Consensus Permit Settlement Agreement (consent decree/order)</p>	<p><b>STAKEHOLDER ACTION</b></p> <p><b>Purpose:</b> To empower stakeholders to take action</p> <p><b>Promise:</b> We will support your decision &amp; assist in your implementation of it</p> <p><b>Types:</b> Industry Sector Initiative Voluntary Program Community Action Sustainability Forum</p>
Government Decision			Shared Decision	Stakeholder Decision

Per the EPA Public Involvement Policy, 2003  
\*\*Some parts of this table are adapted and derived from International Association for Public Participation [www.iap2.org](http://www.iap2.org)