

An official website of the United States Government.

Regulations.gov

Your Voice in Federal Decision Making

SUPPORT

Back to Document Comments

PUBLIC SUBMISSION

Share

Comment on FR Doc # N/A

Posted by the **Agency for Toxic Substances and Disease Registry** on Jun 26, 2026

Docket / Document (ATSDR-2026-0067-0001) / Comment

Comment ID
ATSDR-2026-0067-0002

Tracking Number
mq-u8dc-uiul

Comment Details

Submitter Info

Received Date
Jun 26, 2026

Page Count
1

Comment

Comments of Persistence Analytics Group LLC Regarding APPLETREE Performance Measures

Docket No. ATSDR-2026-0067

OMB Control No. 0923-0057

Persistence Analytics Group LLC submits these comments regarding the Agency for Toxic Substances and Disease Registry's proposed revision of the APPLETREE Performance Measures information collection.

PAG supports ATSDR's continued collection of performance information for the APPLETREE cooperative agreement program. Environmental exposure programs should be evaluated not only by administrative activity, but by whether public-health risk assumptions are identified, verified, acted upon, and followed through to measurable risk reduction.

ATSDR's notice explains that APPLETREE helps recipients identify exposure pathways, educate affected communities, make recommendations to prevent exposure, review health outcome data, and document the effects of environmental remediation on health. Those are exactly the right categories. The performance-measure framework should make sure those categories produce decision-grade information.

The practical utility of the collection would be strengthened if ATSDR ensured the measures can answer the following questions:

1. What exposure risk was identified?

2. What evidence supports the exposure pathway?

3. What population, facility, school, workplace, neighborhood, or community may be affected?

4. What recommendation was made?

5. Who owns implementation of the recommendation?

6. What action was taken?

7. What risk remains unresolved?

8. What changed because APPLETREE intervened?

9. What evidence shows exposure was reduced or prevented?

10. What should trigger follow-up review?

PAG recommends that ATSDR distinguish among four categories of performance:

First, activity measures: meetings, forms, consultations, education sessions, technical assistance, screenings, and reports.

Second, evidence measures: exposure pathway identified, contaminant source characterized, affected population estimated, health outcome data reviewed, and uncertainty documented.

Give Feedback

Second, evidence measures: exposure pathway identified, contaminant source characterized, affected population estimated, health outcome data reviewed, and uncertainty documented.

Third, action measures: recommendation issued, responsible party identified, intervention initiated, site-siting decision changed, exposure pathway interrupted, or remediation linked to health protection.

Fourth, outcome and follow-up measures: recommendation status, unresolved risk, exposure reduction evidence, community notification, and whether additional review is needed.

This distinction is important because activity is not the same as public-health protection. A program can generate reports, education sessions, technical assistance responses, and success stories while still leaving core exposure assumptions unresolved.

ATSDR should also ensure that Recommendation Follow-up reporting captures whether recommendations were implemented, partially implemented, rejected, delayed, or still pending, and whether any remaining exposure risk is understood by the affected community and responsible agencies.

PAG supports burden discipline. The notice estimates a total annual burden of 269 hours across 30 funded recipients. That burden appears modest relative to the public-health importance of evaluating hazardous-substance exposure, but the information collected should be structured to produce practical, comparable, and actionable evidence.

The broader principle is simple:

Public-health performance measures should distinguish administrative activity from verified exposure-risk reduction.

For APPLETREE, the performance question should not be only:

What did the recipient do?

It should also be:

What exposure assumption was tested?

What evidence was found?

What action followed?

What risk was reduced?

What risk remains?

PAG recommends approval of the revised information collection, with emphasis on strengthening evidence quality, recommendation follow-up, exposure-pathway verification, unresolved-risk tracking, and practical utility for communities and decision-makers.

Respectfully submitted,

Neil P. Osnato
Founder
Persistence Analytics Group LLC | United Grid
National Security & Infrastructure Risk Analytics
Demand Durability | Grid Stress | Load Integrity

neil@persistenceanalyticsgroup.com
609-464-9055
<https://persistenceanalyticsgroup.com/>

SAM.gov Registered Vendor
UEI: D3VYU39H6DX9 | CAGE: 19T34
D-U-N-S: 142849930