REGIONAL PLANNING AND MANAGEMENT SYSTEM

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION V

JUNE, 1986

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

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SUBJECT: FY 87 Regional Planning and Management System Guidance

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TO: Division/Office Directors

Attached is the final guidance for the Region's FY 87 Planning and Management System. The guidance includes the RA/DRA's FY 87 Priorities (Appendix A) and explains the management systems and schedules we will use during the remainder of FY 87 to develop objectives, strategies, and workplans, assign accountability and evaluate performance.

The FY 87 Planning and Management System is not greatly changed from last year's System. We have made some minor format revisions so that future system changes can be more easily incorporated. Also, the FMFIA section has been revised to reflect new emphases and strengthened requirements. In order to incorporate these changes into our Regional operations, we encourage the distribution of the System guidance to all Regional Managers and Supervisors. Everyone should pay particular attention to the updated Planning and Management System schedules and the revised FMFIA section. (Appendix B)

We are confident the FY 87 Planning and Management System will build upon past System experience and continue to be a fundamental part of the way we accomplish our environmental and programmatic goals.

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Alan Levin

Attachments

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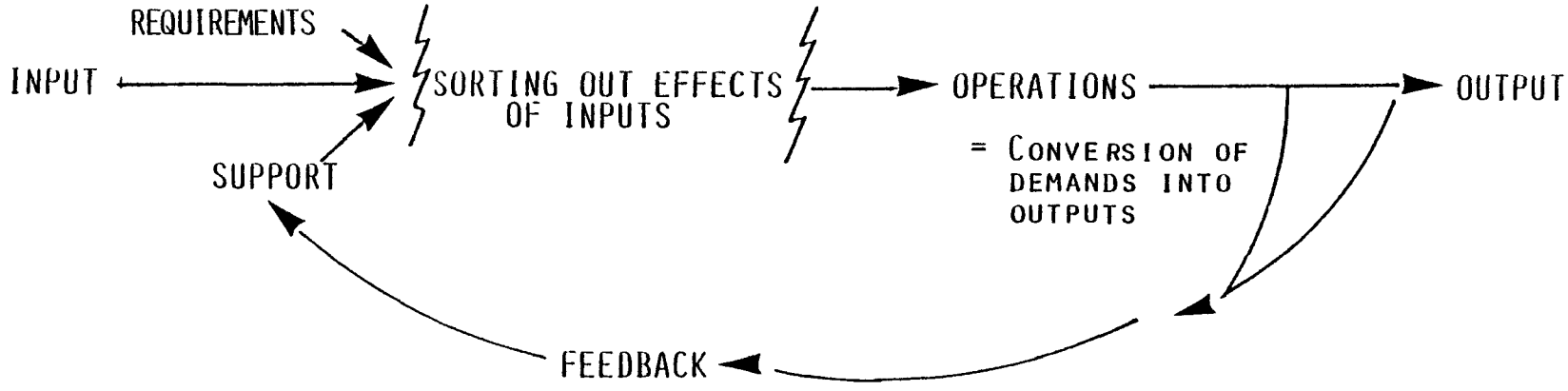


Regional Planning and Management System Guidance

The Region V's Planning and Management System encompasses six, on-going cycles of management activity which interlink and run parallel in time:

I. The Program Planning Cycle during which we determine the direction and focus of our activities, and plan and organize work for the fiscal year so that we address Agency/Regional priorities and meet objectives.

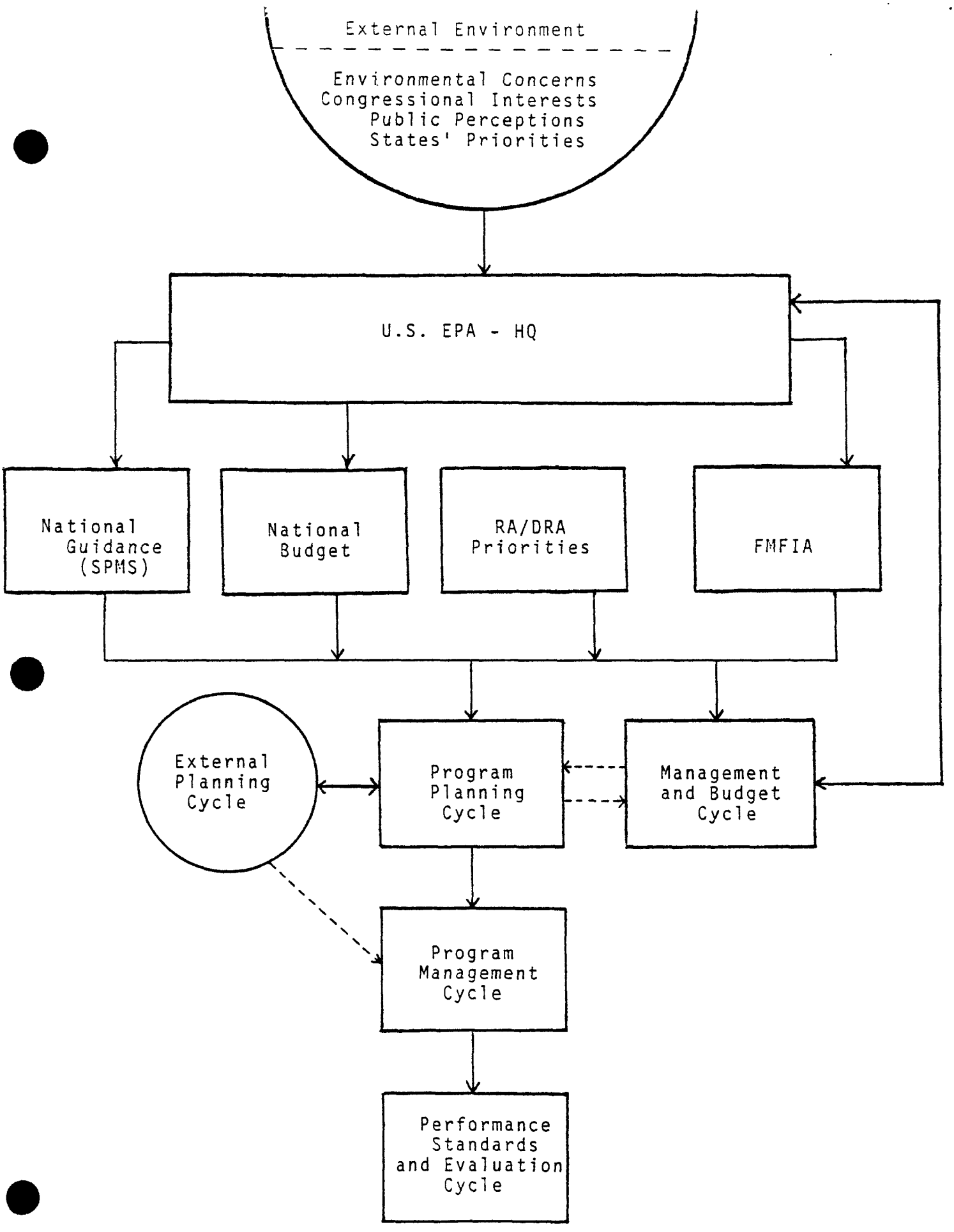
II. The Program Management Cycle during which we monitor implementation of our plans.

III. The FMFIA (Federal Managers Financial Integrity Act) Cycle during which management practices with potential vulnerability for fraud and abuse are identified, and internal control systems are developed, tracked and reported on.

IV. The Performance Standards and Evaluation Cycle during which employee performance standards are developed, employees performance evaluated, and awards recommended.

V. The External Planning Cycle during which overall milestones for State/EPA interaction occur, culminating in an end-of-year close-out meeting.

VI. The Management and Budget Cycle during which the Region determines how it will divide resources (dollars and positions) and how it will manage them.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REGIONAL PLANNING AND MANAGEMENT SYSTEM GUIDANCE

INTRODUCTION

The purpose of the Regional Planning and Management System is to focus work on the environmental and programmatic priorities as determined by Headquarters, the Region, and the States. The planning and management process is a management system which provides the tools by which we organize the Region's work. It is the means by which we direct productivity, assign accountability, and judge effectiveness. The components of our Regional Planning and Management System - objectives, workplans, performance standards - are dynamic in nature; we use them to estimate where we want to be in the future and to manage how we get there.

Over time, Region V has refined its basic planning system to a point accepted and supported by the Divisions and Offices. This guidance documents that "core" system which should not change substantially from year to year. The system guidance has been divided into individual sections corresponding to the six major system cycles. As changes occur in the Agency's process, the respective section relating to that particular cycle will be updated to reflect current policy and procedures.

The Regional Planning and Management System also serves as an extension of the Agency's Strategic Planning and Management System (SPMS). Within SPMS, the Agency produces operating guidance which articulates EPA's goals and objectives, provides direction, and sets priorities. To support the guidance and achieve the goals, Headquarters, Regions, and the States make commitments to take specific actions (SPMS measures). Then, the Agency uses reporting systems to monitor progress on these commitments at Headquarters, in the Regions, and the States.

It is the Region's responsibility to impact National goals and policies so that Regional concerns are fully considered, and to translate National goals to the Regional situation. Furthermore, the Region must conduct oversight in environmental programs delegated to the States, and implement those programs not delegated, so that our goals are clearly in view. Finally, we must monitor progress toward goals and take corrective action where needed.

The major areas of emphasis in the process include the following.

- focusing on environmental planning and results
- strengthening our State relationships
- addressing the RA/DRA's priorities (Appendix A)
- working effectively as a regional team
- addressing the Administrator's and national program guidance and priorities
- meeting regional commitments in the Strategic Planning and Management System (SPMS)
- ensuring that accountability is built into the regional management process
- interdivisional coordination

Planning and Management System Overview

The Planning and Management System includes, the concepts of the Program Planning and Management Cycles, the Management and Budget Cycle, and the External Planning Cycle which consists of milestones for State/EPA interaction. Activities related to the development of FMFIA internal control procedures and employee performance standards are separated out as parallel cycles.

As previously established, the Media Managers (MMs) are the focal points for directing planning activities and coordinating regional operations for their corresponding media - air, water, and hazardous waste. The Toxics Coordinating Committee (TCC), the Groundwater Coordinating Committee (GWCC), and the Great Lakes Coordinating Committee (GLCC), continue to be responsible for the development, implementation, and oversight of regional strategies for addressing environmental problems identified in the areas of toxicant contamination, groundwater protection, and the Great Lakes, respectively. Also, Directors for the Planning and Management Division, Environmental Services Division, Office of Public Affairs and Office of Regional Counsel oversee the Planning and Management System for their respective programs.

Organizational workplans are developed which outline activities necessary to accomplish objectives. Objectives are driven by the following elements: National guidance, RA/DRA priorities, SPMS by commitments, environmental results, program operations, commitments to States and other agencies, and internal control improvements (under FMFIA). The Deputy Regional Administrator (DRA) will review and approve organizational objectives to ensure that the above areas are appropriately addressed and that managers' performance standards are effectively linked to the accomplishment of those objectives. Following this, organizational workplans will again be used as a basis to develop performance standards for regional personnel. During the operating year, the DRA will monitor regional progress in meeting workplan commitments through quarterly review meetings which assist him in evaluating program implementation and in conducting performance evaluations. Additionally, the DRA will provide regular feedback to each organization on the progress being made towards meeting the objectives outlined in its workplans.

The Management and Budget Task Force (M&BTF) oversees the management and budget cycle and is used for reaching consensus and/or providing recommendations to the Regional Administrator (RA) on interorganizational budgetary and resource issues.

The Planning and Management System is a framework outlining major milestones that are to be met as we plan for the next fiscal year's activities and as we oversee the implementation of those activities throughout the year; as such, the system is on-going. The due dates for the milestones that are identified in the Planning and Management System's schedule (Appendix B) provide final dates by which specific outputs are due. Managers have the flexibility to move ahead more quickly than this schedule outlines and, in fact, are encouraged to do so. Managers should establish their own internal working due dates to ensure these process due dates are met, coordinating with other programs, where appropriate.

Planning and Management System Oversight

Management responsibility for the Regional Planning and Management System is tiered. The DRA has overall responsibility for ensuring that the RA's needs are adequately addressed, that major products are appropriate and timely, and that any major outstanding issues are resolved. RA level needs are those that deal with, for example, Agency priorities, Regional/State commitments to Headquarters, major Regional-specific environmental problems, major management adjustments, or State oversight problems. Division/Office Directors are responsible for identifying organizational objectives that warrant RA/DRA - level attention, and for ensuring that supporting objectives, at the branch, section, and unit levels, are developed.

Unforeseen circumstances, during the course of the year, can dictate the need to adjust activities to meet objectives, or to change objectives. Managers throughout organizational lines are responsible for exercising good judgment in making appropriate adjustments so that we meet our environmental and programmatic goals. The usual method for making such adjustments is to propose them to the next higher level of management, thus Sections to Branch, etc., - except when the change warrants RA/DRA involvement, such as for SPMS, where RA/DRA approval is necessary.

Monitoring implementation of the Planning and Management System is the responsibility of the Planning and Budgeting Branch (PBB) Chief, who is the planning and Management System coordinator on behalf of the Assistant Regional Administrator (ARA), and functions as an advisor to Division and Office Directors, and acts as staff to the DRA, as needed. The PBB Chief is responsible for tracking the overall progress of the Regional Planning and Management System and for tracking the production of essential process outputs. The PBB Chief resolves issues, if possible, or surfaces issues that must be resolved by the ARA or DRA.

The MMs and the TCC, GWCC, GLCC, and M&RTF chairpersons are responsible for ensuring that the media-related activities and products for which he/she is responsible (as outlined in this guidance), are coordinated, completed, and/or produced. Each MM should ensure that the varying interests of the appropriate organizations are synthesized into one regional approach for the major components of the Planning and Management System. Substantive differences should be identified and a forum for decision-making provided. At a minimum, each MM should coordinate 1) the media comments on the national guidance, 2) the guidance to be issued by the Region to the States, 3) objective setting and the relevant portions of the regional workplans, and 4) the Region's midyear and end-of-year evaluations on each State's progress in meeting its environmental objectives.

Each MM is responsible for taking the measures necessary to meet these responsibilities and is encouraged to hold media coordinating committee meetings to do so. Should a MM elect to hold meetings, an agenda should be circulated to all members, the DRA and the PBB Chief at least 5 working days prior to any meeting called, and a summary prepared of any major decisions, recommendations and outstanding issues requiring resolution, that result from the meeting. This summary is to be provided to all committee members, the DRA and the PBB Chief within one week following the meeting.

I. PROGRAM PLANNING CYCLE

As outlined earlier in this guidance, MMs are responsible for overseeing program planning and ongoing media coordination. Each MM has overall responsibility for determining what is to be accomplished in the medium during the fiscal year and for ensuring that the regional approach reflects the medium's program managers working as a team. Each MM is the focal point to provide interdivisional coordination in developing and implementing regional strategies to achieve environmental results; in developing consolidated medium approaches for State interface and coordinating subsequent State/EPA interaction; and in fulfilling regional commitments to Headquarters, States or other agencies. Following is an outline of the key steps that are to be taken in the program planning cycle of the Regional Planning and Management System.

- Strategic Planning and Management System (SPMS)

Draft SPMS measures are included in the draft Agency Operating Guidance distributed by Headquarters and reviewed by the Region in January. Final SPMS measures are included in the Agency's final Operating Guidance.

The Region begins to negotiate commitments for these measures with the States and Headquarters during the spring and summer. Final Regional commitments, including those involving the States, must be negotiated and submitted to Headquarters by mid-August. Performance data will be entered into the various computer and manual data management systems on a regular basis. As in past years, this information will be pulled on a predetermined date and incorporated into the Quarterly SPMS reports. Continued emphasis must be placed on entering all data correctly into the various data systems so that our data are consistent with Headquarters' data.

- EMR Update

The Region continues to plan for environmental results. As reflected in managers' performance standards, each MM is challenged with making strides in environmental results planning. The Region undertakes EMR activities which emphasize State involvement, geographic problems and development of environmental indicators.

The process for accomplishing the annual EMR activity will include full participation by senior managers with PBB providing staff support and coordinating the effort. Specific guidance on EMR activity will be issued annually.

- Managers Financial Integrity Act (FMFIA) Requirements

To effectively implement FMFIA requirements in correcting internal control/management weaknesses, FMFIA was integrated into the Regional Planning and Management System. This is facilitated by the similarity of FMFIA's quarterly reporting requirements and the Regions quarterly workplan reviews. Each Division/Office is responsible for developing draft and final FMFIA objectives; delineating key action steps, timetables, and responsible personnel in their draft and final workplans; and monitoring FMFIA activities through the quarterly annotated workplans.

° Identification of Areas for Improvements in Intra-regional Coordination

Each Division/Office is responsible for identifing areas where improvements should occur in the coming fiscal year. [Examples of areas where increased coordination can improve management or program operations are: coordination between the Planning and Management Division and other programs regarding data processing practices; coordination between Office of Regional Counsel (ORC) and other programs concerning case conduct and development; and, coordination between the Waste Management Division and other programs on the Record of Decision (ROD) process].

It is also the responsibility of each Division/Office to identify necessary outputs needed from other programs in the coming fiscal year in order to carry out environmental and program objectives. [Examples of expected outputs include numbers and types of inspections, schedules and requirements for quality assurance activities, and numbers and types of samples to be analyzed].

A written list and description of the identified areas for improved coordination and required outputs must be prepared by each Division/Office and transmitted to other affected programs, with a copy to the DRA. The lists can then be used as a basis for negotiations from which Divisions/Offices develop objectives/workplans for the coming fiscal year. These lists need to be developed early in conjunction with the resource allocation process to insure completion in time for inclusion in the draft workplan submittals. The DRA will review the workplans to ensure these areas are appropriately included in organizational workplans.

A. Developing Objectives

An essential element to the success of our Regional Planning and Management System is the participation by all levels of management in setting objectives. Objectives should be negotiated with those who share responsibility in meeting them. Top management has the responsibility of ensuring that specific organizational objectives reflect agreement and understanding by their line managers and support programs. Furthermore, objectives must be clearly communicated to affected personnel.

In an effort to gain mutual understanding and agreement on the Region's major objectives senior managers will present their organizational objectives at one joint session. This should occur prior to DRA final approval of organizational objectives.

Organizational Objectives

Division/Office Directors are responsible for preparing draft organizational objectives for the DRA's review. Objectives must specifically address regional commitments/requirements related to the following categories:

- carrying out national guidance (including the Administrator's and National Program Manager guidance)
- fulfilling regional commitments to the SPMS
- accomplishing the RA/DRA priorities
- carrying out program operations, including corrective action under FMFIA
- fulfilling commitments to States and other agencies
- implementing strategies to resolve environmental problems

Division/Office Directors should be selective about which objectives warrant RA/DRA level attention. Organizations are encouraged to begin developing objectives as soon as possible. MMs should sort out appropriate organizational roles and responsibilities for objectives with shared responsibilities within the media.

The DRA reviews and comments on draft objectives prepared by organizations. These draft objectives shall be submitted by Division/Office Directors to the DRA in early June. The DRA will provide comments on these draft objectives to each organization within 2 weeks of receipt. Final revised objectives, based upon any DRA additions or modifications, shall be resubmitted to the DRA within 2 weeks. The DRA will determine final approval.

B. Development of Organizational Workplans

Division/Office Directors will be responsible for preparing organizational workplans, and for ensuring that any specific concerns articulated in the DRA's comments on draft objectives, are subsequently incorporated into workplans.

Because these workplans are monitored and tracked during the fiscal year, it is imperative that the workplans clearly specify the steps needed to accomplish an objective, milestones for completion, outputs/products that will result, assign responsibility for implementation, and any contingencies/assumptions. In order to provide for uniformity and consistency in workplans, the standardized format developed for previous workplans will be used. (Appendix C).

Instructions on specific requirements for workplans will be provided to organizations in mid-May. Before the workplans are developed, PBB will meet with each Division/Office to discuss these requirements and the overall work-planning process in more detail. PBB staff will also be available to assist regional managers during the development of the workplans.

Draft organizational workplans are to be submitted to the DRA for review in early August. Prior to submittal to the DRA, Division/Office Directors are responsible for coordinating workplans with affected or involved organizations. If an orgnanization is responsible for any activities related to an environmental strategy developed by the TCC, GWCC or the GLCC, the appropriate TCC/GWCC/GLCC chairperson should also have reviewed that organization's workplan prior to DRA submittal. MMs have overall responsibility for ensuring continuity and coordination among all organizations' workplans for media-related objectives. Any unresolved issues should be identified, in writing, and submitted to the DRA when the workplan is submitted.

C. Review of Draft Organizational Workplans

The DRA, with assistance from PBB, reviews organizational workplans to ensure that the RA/DRA priorities are adequately addressed, regional commitments will be met, and that major products are appropriate. The DRA will also resolve any outstanding issues identified to him. Comments on draft workplans will be provided to Directors within 2 weeks after receipt.

D. Submittal of Final Workplans

Directors will be responsible for addressing any comments received. Final workplans are to be submitted to the DRA for approval in early September. DRA response will occur within 2 weeks after receipt.

II. PROGRAM MANAGEMENT CYCLE

Plans, by nature, are estimates of the future. Once the operating year begins, it is necessary to ensure effective, productive management so the plan can be implemented. All levels of management monitor activities to achieve results expected from the Region; however, it is equally necessary that the management style be flexible enough to deal with real changes and events which occur during the operating year.

A. Quarterly Review Meetings

The DRA will be responsible for inplementing a system for reporting progress on regional commitments to HQ and other major organizational objectives and workplans. As in SPMS, tracking is the link between plans and performance. Quarterly workplan reviews will ensure that the Region is getting the desired results.

Each quarter, Division/Office Directors will submit annotated workplans - clearly indicating when and how key action steps have been completed, or if due but not completed, why - to the DRA for review. The DRA will meet quarterly with each program to discuss progress. At quarterly review meetings, managers will focus on the accomplishments of and significant problems encountered in the last quarter. Where reasons for significant slippages are not readily apparent, management reviews are undertaken to identify necessary corrective actions. The PBB will facilitate this process and serve as staff to the DRA/ARA to coordinate these activities.

B. Management Reviews

Each manager, who has responsibility for fulfilling our plans, must establish his or her own monitoring system for assessing progress and adjusting to change. The workplans provide key objectives and major activities for our organizations; so, work of others must be effectively monitored and routinely compared to workplans to reexamine what progress is being made, what adjustments are necessary to meet objectives, and which activities should be changed due to unanticipated events.

C. Changes to Workplans

Changes to workplan objectives or to key action steps that affect outputs, which were approved by the DRA, can be made by submitting the changes, along with the reasons for the changes, to the DRA. However, the mere fact that a commitment is unlikely to be achieved is not considered sufficient cause for change. Additionally, before negotiations to change SPMS commitments with the Headquarters' program office begin, all requests for proposed changes must be submitted to the RA, through the DRA, with a copy to PBB. A brief explanation of the reason(s) for the changes should also be included. After the RA approves the requested commitment changes and negotiations with the program office are completed, the Division should route a formal transmittal memo through the Planning and Management Division for the RA to send to the National Program Manager (NPM). After RA signature, PBB will send a copy of this transmittal memo to the Office of Management Systems and Evaluation (OMSE).

III. FEDERAL MANAGERS FINANCIAL INTEGRITY ACT (FMFIA) REQUIREMENTS

A. Overview

EPA is required to identify, report, and correct all actual or potential instances of waste, fraud, abuse, and mismanagement in the Agency, including the possible perception of weak controls. It is a broad mandate covering all internal control weaknesses needing correction and does not apply to just financial management aspects of the Agency's operations. It should include all regional management practices and systems whether related to State programs, Region V commitments to Headquarters, or just the daily operation of the Region. The intent is to improve the management of all regional practices and systems when weaknesses become evident.

The FMFIA process relies heavily upon self-evaluations and assurances of internal controls at sub-primary office (i.e., Regional Office) levels called assessable units. Beginning in FY 1986, each Regional Division and Division-level office is an assessable unit.

Annually in the spring, the Region is required to update its existing internal control documentation which addresses how the Region is managing various internal control functions (assessable units, event cycles, control objectives, and control techniques).

Every two years (i.e., FY 1986, 1988, etc.) vulnerablity assessments of each assesable unit must be conducted. All program and administratrive areas are ranked in terms of their potential vulnerablility or susceptibility to fraud, waste, abuse, mismanagement or perception of such occurrences. Areas of high potential vulnerability must undergo an internal control review, testing existing control mechanisms to determine whether controls are adequate. Any weakness discovered during internal control reviews, or as a result of audits of Regional programs or other reviews and activities by Regional staff, must be corrected as quickly as possible.

Following the end of each fiscal year the RA is required to submit an annual assurance letter to Headquarters identifing actions taken during the year to assure (and improve upon) the adequacy of the Region's internal controls. All administrative and program weaknesses identified during the fiscal year but not corrected by year-end must be reported in the RA's letter. The weaknesses are entered into a National Corrective Actions Tracking system (CATS). Quarterly status reports on CATS actions are required until all corrective actions are completed.

The Administrator uses the annual assurance letter from each RA (and Headquarters' AAs) to submit an annual statement to the President and Congress on the status of the Agency's internal control systems.

B. Development of FMFIA into Regional Objectives

Because of FMFIA's goal of correcting internal control/management weaknesses and its recurring reporting requirements, it is advantageous for the Region to integrate FMFIA into the regional planning process of objective setting, workplanning

and monitoring. To the extent possible, internal control initiatives should be included when establishing draft and final organizational objectives. Not unlike SPMS, the development, assessment and maintenance of internal controls is an ongoing process with activities which can be estimated early and updated as the fiscal year progress. These activities should be included in the draft workplans with key action steps, timetables and responsible personnel identified as soon as possible.

C. Monitoring FMFIA Activities

As part of the workplan, FMFIA objectives will be monitored at least every quarter when annotated workplans are submitted to the DRA. Each quarter's annotated workplan should concide with the Region's CATS status reports, making the system not only more effective, but streamlined. While separate CATS forms are needed for Headquarters, the two processes should reinforce each other allowing for smooth, effective management of the vulnerability assessments, internal control reviews, the annual assurance letter and the quarterly CATS status reports.

D. FMFIA Coordination

Because the Office of the Comptroller manages FMFIA for the Agency, the responsibility for coordinating and monitoring FMFIA events is in the Planning and Management Division with the Deputy Director designated as the Regional Internal Control Coordinator (ICC). The Regional ICC will issue specific call memos and coordinate any training necessary to implement FMFIA. This is not to be construed as narrowing FMFIA's scope in the Region to financial and administrative activities, but to assure a solid link back to the Comptroller's Office.

Each Region V Division and Office has designated a Divisional ICC to coordinate internal control activities withing the Division or Office and to interface with the Regional ICC. The Divisional ICC is normally the Deputy Division Director or Director, where no Deputy exists. This level of attention is designed for two reasons: one, to assure high level management attention to internal controls within, each Division and Office; and two, to assure proper integration with the Region's organizational workplans and workplan monitoring frame work.

IV. PERFORMANCE STANDARDS AND EVALUATION CYCLE

A. Performance Standards Development

Performance standards will continue to be closely linked to the objectives of the workplan, as a part of our continuing effort to increase accountability. However, performance standards go beyond workplans. Performance standards should describe, in as objective terms as possible, the elements of good management in addition to producing results - e.g., demonstrating full consideration of other organizations and the Regions' needs; instilling a cooperative attitude; governing inside and outside relationships with diplomacy and tact. The link between plans, results, and how we got there needs to be fully considered in development of both the performance standards and award recommendations.

B. Performance Standards Schedule

In order to alleviate the end-of-year workload crunch the Region will allow standards to be completed after evaluations are conducted. Agreements on performance standards for Division and Office Directors will precede establishment of the remaining performance standards for regional staff. Therefore, Division and Office Directors' draft performance standards are to be submitted for ORA review in early October; agreements with Directors are to be completed by mid-October. Performance standards are required for every staff member in the Region and are due by the first working day of November. Personnel will issue guidelines for the development of performance standards in August.

C. Performance Standards Tracking and Performance Awards

On a periodic basis, the Personnel Branch will provide each Division/Office with a list of newly assigned, promoted, and hired employees who do not have current performance standards on file with the Employee Relations Staff, and set a 30-day deadline by which to submit them. Performance Award nomination information will be sent to all supervisors during the first week of September.

V. EXTERNAL PLANNING CYCLE

Region V's ability to achieve our environmental goals rests on our relationships with the States. The External Planning Process sets forth the operating principles and guidelines used in maintaining our State partnerships; it reconfirms and reinforces current Regional practices and procedures.

The Region has an overall successful record in carrying out effective oversight of our delegated States. However, as indicated in the Agency's oversight policy, the importance of EPA's oversight efforts requires that we document a "comprehensive, consistent, and constructive approach to oversight of State programs. Such an approach necessitates both a continuing strong EPA presence and a workable State/EPA relationship that takes advantage of the particular strengths and capabilities of each, in order to deliver more efficient and effective environmental protection."

The External Process parallels the general timeframe of our internal planning process. Components of the External Process include: State involvement in EMR development; State review of the agency guidance and SPMS measures; development of State specific guidance; State workplans; development and awarding of program grants; monitoring of State performance (including evaluation or State audits); State/EPA enforcement agreements; and the RA/State Director end-of-year close out meeting.

Each year we must focus on the quality and consistency of State relationships. We recognize the differences in State interactions that emanate from different laws, programs, and State needs. However, those differences need to be identified and examined to assure the State/EPA relationships are proceeding according to Regional guidelines; and, that those guidelines effectively further our mutual progress towards environmental goals.

The individual media managers are responsible for conducting the State/EPA interactions for their programs. In addition, as a part of that effort, media managers are responsible for assuring that other regional organizations with a stake in these interactions are effectively involved, so that their needs and priorities can be addressed.

On an ongoing basis, senior managers should examine and clarify the principles and guidelines governing State relations. Where we fall short as a Region, or a program, in operating under those guidelines, we will need to adjust activities accordingly.

A more indepth description of the components of the external planning process follows:

A. Regional EMR Development

The Region and the Agency will continue our current momentum to plan for environmental results. Region V will continue to place special emphasis on geographic problems, greater State involvement, and measures of environmental

quality. It is important to involve the States in our EMR approach. State cooperation is particularly essential to the successful resolution of geographic problems and development of realistic and effective environmental indicators. Involving the States will help define where environmental problems are most severe and where National, Regional, and State programs/tools are inadequate.

This is particularly important for programs delegated to the States. At a minimum, the Region will request State counterparts to review the yearly draft EMR write-ups. Further, the program divisions are responsible for ensuring that State workplans reflect the appropriate projects or activities required to meet EMR-related goals.

B. Agency Guidance and SPMS Review

Region V will continue to involve the States in development of the Agency's operating guidance and SPMS measures. The RA will distribute draft operating guidance to appropriate State Directors for review and comment. Media managers should involve their program counterparts in the guidance development process, as well. Considering State concerns and informing the States of new or changing priorities should occur during preliminary guidance development stages. Meeting with State Directors to review guidance and program implications is encouraged. The Region will forward State comments on the draft guidance document to Headquarters. Media managers should follow through with Headquarters counterparts on State concerns and respond back to the States on the extent to which their comments were taken into account.

C. State Specific Guidance

The first step for developing State specific guidance occurs with the receipt of comments from the States on the Agency's draft guidance and SPMS measures for the coming fiscal year. Generally, very little changes from the Agency's draft to the final guidance. Consequently, the Divisions/Offices should begin as soon as possible to "tailor" the Agency's draft guidance and the State comments into State specific guidance. Further, since the States have their own planning and budgeting cycle, the earlier the better. This allows time for the States to approach their respective legislatures when additional funding or authorization is needed.

Divisions/Offices translate the overall program guidance into specific expectations of the States. State specific guidance reflects State abilities, maturity of State programs, special environmental problems, etc. Also, it reflects the appropriate policy and cross media concerns, e.g., "Oversight Policy", "Federal Facility Policy", "EMRs", "Indian Lands Policy", "Enforcement Agreements", etc.

The Region's "model" for developing State specific guidance is as follows:

- Proposed level of fiscal year funding (base)
- Base plus incentive funding
- Administrative procedures for grant application
- Guidance plus SPMS translated to State specific actions
- Areas for improvement based on previous evaluations
- Special initiatives agreed to through EMR development

The media managers are responsible for ensuring that the appropriate Divisions/Offices are involved in the development of State specific guidance.

D. State Workplans

State specific guidance translates to specific activities and outputs which are itemized in State workplans. Generally, the States develop two workplans for regional review, a draft and a final. Usually, the draft workplans are good enough to form the basis for developing the initial regional commitments to the Administrator's Strategic Planning and Management Systems (SPMS). Media managers are responsible for ensuring that the draft and final workplans are circulated to the appropriate Divisions/Offices for review and comment, and for managing negotiations with the States on behalf of all programs involved.

E. State/EPA Enforcement Agreements

While States and local governments have primary responsibility for compliance and enforcement actions within delegated or approved States, Region V retains responsibility for ensuring fair and effective enforcement of Federal requirements, and a credible Regional deterrence to non-compliance. The Region will develop enforcement "agreements" with each State to ensure that there is: (1) clear oversight criteria, specified in advance, to assess good compliance and enforcement program performance; (2) clear criteria for direct Federal enforcement in delegated States with procedures for advance consultation and notification; and (3) adequate State reporting to ensure effective oversight.

Each Program Division will individually negotiate State-specific enforcement agreements for their media or medium, as per Headquarters guidance. State/Federal enforcement "agreements" will be set forth in program cooperative agreements and the enforcement commitments are to be included or referenced in each State's final workplan. The regional ad hoc committee on State/EPA "agreements" should reconvene annually to evaluate this process for the current year. The committee should then report findings to the RA by the end of the second quarter so that programs can address issues during the upcoming grant year State negotiations.

F. Development and Awarding of State Cooperative Agreements

Media Managers should conduct State negotiations so that the grants can be awarded as soon as our appropriations are received. Special conditions on grants to govern State behavior should be rare. This is in recognition of the cooperative agreement as an agreement where program expectations have been negotiated, agreed to in advance, and documented in State workplans. Special conditions appear where agreement is uncertain or other controls are necessary.

G. Monitoring and Evaluation of State Performance

Monitoring of State performance focuses primarily on the meeting of SPMS and other Headquarters, Regional, and workplan commitments. Monitoring activities include analysis of quarterly program reports, State visits, file audits, monthly or bi-monthly conference calls, etc. The basis for monitoring and evaluation of State programs should be negotiated with the States at the time of State workplan development and made part of the grant.

An essential element of successful evaluation is mutual and clear agreement on expectations. Usually, the States are evaluated twice annually, at mid-year and at the end of the fiscal year. Evaluation is the assessment of how well the States are meeting their program objectives and how well the Region has supported their efforts. Evaluation focuses on the short and long term outputs States programs in meeting National and regional priorities. Evaluation focuses on program policy and direction. Evaluation seeks to improve decision-making and program management at the State and Federal levels. The results of State evaluations are factored into State-specific guidance and State workplans of the next fiscal year.

H. Technical Assistance

The Region provides technical assistance to the States on a wide range of activities. This includes providing information or expertise to the States in developing permits, SIPs, data systems, etc. State technical assistance needs should be assessed continually as programs mature and priorities change.

I. End-of-Year Close-Out Meeting

Annual close-out meetings between the RA and each State Agency Director will be held during October-November. These meetings are intended to be open discussions on areas of concern or importance to the States or the Region. However, these meetings function as a subset of evaluating State performance and set the tone for the next fiscal year.

Prior to the close-out meeting, Water, Waste, Environmental Services and Air Divisions and the GLNPO are to prepare short summaries of each of their respective programs to serve as a basis for the end-of-year report, which will be prepared by the State Coordinators. The end-of-year report will be used to brief the RA in preparation for the close-out meeting and is to portray a regional perspective on each State. A memo will be issued in early September outlining the format, due dates and schedules for the end-of-year report/close-out meeting. An essential element of the close-out meeting is follow-up. The ORA will be responsible for preparing summary reports on the close-out meetings, and highlighting items for follow-up by Division and Office Directors.

Summary

Each Media Manager is responsible for identifying and coordinating State/EPA interaction for their respective medium. MMs will be responsible for ensuring that regional interaction with States in the areas of program delegation and policy direction is coordinated among the various organizations involved in these areas. MMs are also responsible for ensuring that the national oversight policy is implemented in their respective mediums.

VI. MANAGEMENT AND BUDGET CYCLE

The Management and Budget Cycle of the planning process is the system by which the Region determines how it will divide resources (workyears and dollars) and how it will manage them. Except for the three-tier approach to the workload analysis process, this cycle of the planning process will remain relatively unchanged from year to year.

The M&BTF will continue to oversee this cycle of the planning process. The M&BTF will be responsible for providing the ORA with recommendations on regional position allocations after final workyear targets for Region V are known and for reaching regional consensus on interorganizational budgetary and resource issues.

The following is a description of the major elements of the management and budget cycle:

° Workload Analysis

The results of the Agency's Budget Process lead to the distribution of workyears to the Regions through the workload analysis (WLA) process. The WLA process begins in early January and is concluded in March. The workload models identify major work elements required to carry out a program, estimate the level of resources in workyears necessary to support the work elements identified, calibrate/prioritize work elements so that the model conforms with available workyears, and determine regional shares of each Program Element (PE).

In FY 86, there was a consensus in both Headquarters and the Regions that the workload analysis process during past years had been overtaxing time, labor, and patience. Therefore, Headquarters developed a three-tier system to streamline the process. Tier I program elements have new models developed, Tiers II and III program elements rely on existing models and may be slightly modified.

Because of the time and effort required to construct new models, Tier I is limited to a few program elements. Headquarters hopes to cycle all programs through Tier I in about three years to keep the models up to date and to meet the NAPA recommendation to bring all models toward a consistent format. The remaining program elements are placed in Tier II or Tier III depending on the degree to which the models need to be changed for program activities in the coming year. While work groups on Tier I models start meeting in late fall, there are no formal work groups or extensive meetings for Tier II and III models because they rely on existing models. However, the national program manager's staff are to consult the lead Region informally as they adjust a model's workyear distribution.

The workload analysis process officially begins with the issuance of the "call letter" by the Office of the Comptroller (OC) in January which directs

the national program offices to submit the models with their workyear distributions by a due date in March. Once submitted to OC, the models are sent to the Regions for their review and comment. This stage is the most critical for Region V. The Regions then have about two weeks to submit appeals on the workload models.

Two significant changes have been brought about in the final phases of the WLA process by the new three-tier system. First, DRAs no longer vote to accept or reject each model. Second, it is expected that the number of appeals will be reduced considerably. While there is no limit on appeals on Tier I models, few are expected because of the thorough review by all participants during the model's development. Appeals on Tiers II and III models should, according to Headquarters, be limited to those situations where a Region's workyears in that program element are changed by at least 10 percent from a "documentable alternative to the proposed distribution" for Tier II models and by at least 10 percent from the Comptroller's Prorated Distribution for Tier III models.

° Position Allocations

After final workyear targets resulting from the WLA process are received by the Region from Headquarters, regional position allocations will be determined. These allocations divide resources among organizations sharing PE's. Workyear allocations will again be determined using the following procedure: The M&BTF chairperson will publish a list of targets by PE which will be distributed to the appropriate Division/Office Director. It will be up to each Division/Office Director to negotiate with the Directors of the support organizations (primarily P&MD and ESD) to determine the level of services and accompanying resources to be provided. There will be two weeks allotted for these negotiations and agreements. For PE's which are not under dispute, the PE coordinator will complete simple resource distribution forms to be submitted to the M&BTF. For PE's in dispute, each organization allocating the resources will be required to document what is expected to be accomplished in terms of outputs, and to delineate the need and level for exact support services and their pricing. Each receiving organization disputing the allocation must show why it disagrees with the pricing (amount of resources or level of effort). These data, along with the allocations already agreed to, will be collected by the M&BTF and furnished to the RA who will make all final decisions on position allocations. The M&BTF will then publish finalized position allocations which will set the stage for the development of each organization's staffing chart.

° Staffing Charts

After the distribution of positions within the Region has been approved by the RA, each organization's staffing chart will need to be reviewed to incorporate any changes necessitated by changing organizational ceilings for the coming year. In order to effectively manage toward our organizational levels, a staffing chart which reflects current levels will be provided.

Depending on changing needs within organizations, these staffing charts may need to be adjusted. All adjusted staffing charts should be transmitted to the Planning and Budgeting Branch for approval. On October 1, and at the beginning of each quarter in the fiscal year, each Division and Office must submit an updated staffing chart for its entire organization. This includes identifying all PFT and OPFT positions as well as any positions you plan to fill through the Upward Mobility program. Contractor, AARP and SEE employees should also be identified on the staffing chart.

° Operating Plan

To begin the development of the operating plan, the Office of the Comptroller provides dollar limitations by appropriation, i.e., Superfund, Great Lakes, Salaries and Expenses (S&E), and Abatement, Control and Compliance (AC&C). Within these appropriations, the Office of the Comptroller further breaks down dollar amounts in various resource categories such as travel, printing, transportation of things, etc. Although changes between appropriations are not permitted, the Region has some flexibility, with the exception of travel, to adjust between categories within appropriations from year-to-year.

The Budget Analysis Section (BAS) of the Planning and Budgeting Branch has the overall responsibility for the spread of funds into those categories which make up the operating plan. The operating plan is sent to Headquarters where it is reviewed and approved. In its final form, it establishes the Region's budgetary control totals per program element (from which detailed organizational budgets are ultimately constructed). The operating plan may go through several revisions before the fiscal year begins and even during the fiscal year, based on changes to the Region's or Agency's budget.

° Organizational Budgets

Organizational budgets will be developed, contingent upon the availability of funds. Object classes (e.g., travel, training, contracts, contingency) and their funding levels will be developed by BAS and approved by the RA. Once these funding levels are set for the whole Region, the BAS, through the M&BTF, will work with the Divisions and Offices to develop their organizational budgets. The BAS will also coordinate with the appropriate Divisions and Offices to develop the Superfund and Great Lakes budgets.

° Training Plan

As the resource allocation process establishes how much funding is available for regional training, Personnel will develop a training plan to best satisfy the Region's needs. To develop this training plan, Division and Office Directors will appoint three ad hoc committees: Management, Support Services, and Technical. Each committee will meet separately for six one-hour sessions, initiating training proposals which will address the training needs of their individual Regional programs and responsibilities in the coming year. The Regional Health and Safety Committee is also encouraged to identify and submit health and safety training needs. The training plan will be issued by mid-September.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAR 31 1986

REPLY TO THE ATTENTION OF

5RA-14

MEMORANDUM

SUBJECT: FY-87 RA/DRA Priorities

FROM: Alan Levin, Deputy Regional Administrator; Valdas V. Adamkus, Regional Administrator

TO: Division and Office Directors
Intergovernmental Relations Staff

Attached are the final RA/DRA priorities for FY-87. Based on the few comments received, we have made several relatively minor changes. First, since the Indian Lands program is now well under way, we have deleted that as a priority for FY-87. Secondly under Program Management priorities, we have strengthened the paragraph on Integrating Water Pollution Problems Associated with the Great Lakes.

Please be sure to incorporate the RA/DRA priorities as you develop your FY-87 work plans and performance agreements.

Alan Levin

Valdas V. Adamkus

Attachment

FY 87 RA/DRA PRIORITIES

For FY 87 our priorities have not changed significantly from FY 86, supplement the Agency's priorities found in the national guidance, and fall into four main categories: program management, state relations, human resources management and special environmental initiatives. We are proud of the progress already made toward our FY 86 priorities.

In program management, we need to continue our efforts for improving inter-divisional coordination across program lines, particularly on multi-media problems. In addition, we need to develop more innovative ways to improve public health through the EMR Action Plan, and to control toxics across media. We also need to improve our public outreach program and continue to pursue compliance by Federal Facilities. In enforcement, we intend to remain the leader Region V has always been through aggressive, but fair enforcement actions in conjunction with the States.

In State relations, we began several new initiatives during FY 85 and 86. For example, our meetings with the State Directors twice a year and the DRA's visits to the State pesticide organizations are proving successful in improving Region/State communications. In addition, our efforts to involve the States in the very early stages of the Agency's and Region's planning process as well as the EMRs must continue and improve in FY 87. Also, we again will set forth clear enforcement expectations for both the Region and the States in State/EPA Enforcement Agreements.

In the area of human resources management, our policy was issued in FY 86 and is being implemented. We now have an up-and-running Human Resources Council

and a fully participative training program that is providing more training opportunities than ever to our employees. The supervisory training program (McGraw-Hill) has been enthusiastically accepted, and we continue to make excellent progress in meeting our affirmative action goals in FY 86. We want Region V to be exemplary in human resources management in FY 87.

Each Region V media manager must take the national priorities, our priorities and their own assessment of environmental needs into account when planning media objectives, organizational objectives, and State guidances for FY 1987.

Alan and I continue to see Region V as a pacesetter in many areas critical to Agency operations. We are asking you to maintain that momentum in FY 87. Our most serious environmental challenges are increasing in complexity; they are often unprecedented and involve real uncertainty. These environmental problems need cross-media control and Federal/State cooperation to be solved effectively. In the future, our sense of accomplishment will rest not only on successfully meeting these environmental challenges, but having met them as a team -- with one another, with our State partners, and the involved Region V citizenry.

Our priorities for FY 87 follow:

PROGRAM MANAGEMENT

- An overall, guiding principle for FY 87 is to continue to improve our MULTI-MEDIA APPROACH to solving environmental problems. In particular, we want to emphasize a multi-media approach for:

  * Solving "areas-of-concern" identified within the Great Lakes' basin, where other organizations in the Region need to contribute to remedial plans.

  * Superfund clean-up, so that water and air resources are protected as we change land disposal practices. (Also, we need to ensure that cost recovery is pursued, when appropriate.)

  * Groundwater, so that diverse programmatic efforts to protect, clean-up and enhance this vital resource are conducted in a coordinated manner.

  * Enforcement, so that we pursue compliance, having considered problems across media - then take action.

  * Control of toxics, so that transfer of these contaminants from "scrubber to sludge" is no longer left unchecked. This means that the Region continues our initiative for an integrated approach in identification of toxicant sources, pathways and fate so that adequate safeguards are provided.

- We want to continue our emphasis on FEDERAL FACILITIES COMPLIANCE for FY 87. We are in a position to make the Federal government a leader in environmental compliance, and have a responsibility to take steps to do so. In Region V, we need active support from top managers in sorting out what needs to be done and who needs to do it - assuring that States take action where they have the lead. We will be involved in Federal Facility problem resolution as a Region.

- We look to all media work plans and program operations for INTEGRATED SOLUTIONS TO WATER POLLUTION PROBLEMS IN THE GREAT LAKES. The most pressing environmental problems - toxic chemical loadings from atmospheric deposition, nonpoint source, groundwater infiltrations and sediments - require commitment and support from every office to be resolved.

- The Region made real progress toward improving INTERDIVISIONAL COORDINATION in FY 85 and first half of FY 86, and we must continue and improve these efforts in FY 87. Interdivisional communication needs should continue to receive top management attention and should be clearly understood at branch, section, and unit levels within organizations.

- Region V operates an outstanding ENFORCEMENT program. We are in a position where we can think in terms of innovative approaches. This effort links to other priorities. We can make improvements through: use of multi-media inspections; making Federal Facility compliance a model; better criminal enforcement, and shared efforts with the States. Also, we need to

maintain our momentum in pursuing new cases while assuring follow-through on cases previously initiated.

- Part of our team responsibilities is to effectively inform and involve the public in the Region's decisions. Region V needs to improve our OUTREACH to all our constituencies to gain understanding and support. In particular, we must strengthen and expand our contacts with the news media.

STATE RELATIONS

- In our state assistance programs, we will follow the Performance Based Assistance Policy. We must achieve an uniform approach in providing program assistance guidance, negotiating commitments, managing funds, and conducting reviews.

- For FY 87, we must continue to develop our programs in partnership with the States, particularly through EARLY STATE INVOLVEMENT in EMR, guidance, and SPMS measures development.

- We must INCREASE our efforts to FOLLOW THROUGH on State concerns as expressed through the above means and as gathered during technical assistance, program evaluation and end-of-year, close-out meetings.

- We will continue to articulate our enforcement expectations through the STATE/EPA ENFORCEMENT AGREEMENTS.

- We must continue to examine and define program purposes and to REFINE our processes for OVERSIGHT, accordingly.

- We must assure that all Region V employees establish and, at all times, maintain a courteous, sensitive, and cooperative relationship with our State partners.

HUMAN RESOURCES MANAGEMENT

The Region will continue its efforts to implement an effective human resource development program.

- We need to open more OPPORTUNITIES for CAREER GROWTH and DEVELOPMENT so that our employees see their career future at EPA.

- To be effective we need to focus our efforts on instilling a SENSE OF ACCOMPLISHMENT and a SENSE OF WORKING AS A TEAM in the Region.

- We will continue to place our attention on PERFORMANCE EVALUATION AND FOLLOW-UP. We need to work with supervisors and employees to make clear the requirements of good performance.

- We must continue to sensitize our managers and supervisors to the various opportunities for fulfilling our EEO/AA RESPONSIBILITIES in the areas of recruiting, training and promotion.

SPECIAL ENVIRONMENTAL INITIATIVES

Region V chose the Grand Calumet (Southeast Chicago/Northwest Indiana) area to concentrate our efforts for the FY 86 EMR action plan. We will continue these efforts for FY 87. Additionally, for FY 87 we will look to senior management to develop more innovative ways to improve public health through the EMR Action plan, for initiatives to complement our EMR efforts through selection of geographic areas for cross-media approaches to environmental problem solving; and for development of environmental-quality success indiicators.

We will assure that the States are involved in the early stages of EMR Action plan development, and support their efforts for environmental pilots in FY 87.

FY 87 PLANNING AND MANAGEMENT SYSTEM SCHEDULE

	PROGRAM PLANNING CYCLE	PROGRAM MANAGEMENT CYCLE	FMFIA CYCLE	PERFORMANCE STANDARD CYCLE	EXTERNAL PLANNING CYCLE	MANAGEMENT & BUDGET CYCLE
DECEMBER	Draft Agency Guidance issued					
JANUARY		1st Quarter Program Reviews			Preliminary estimates of FY 87 appropriations for State program grants	Workload model (WLM) process begins
1/17/86	Reg./State comments on Draft Agency Guidance due					
1/31/86			1st quarter CATS report due to HQ			
FEBRUARY						
2/4/86						President's budget released
2/14/86					Generic Water Guidance issued	
2/27/86			Annual plan due to HQ			
MARCH					FY 87 State Grants Negotiations Begin	
3/7/86						Workload models and workyear distributions due
3/14/86	Final Agency Guidance published					
3/28/86						Regional appeals on models due

FY 87 PLANNING AND MANAGEMENT SYSTEM SCHEDULE

	PROGRAM PLANNING CYCLE	PROGRAM MANAGEMENT CYCLE	FMFIA CYCLE	PERFORMANCE STANDARD CYCLE	EXTERNAL PLANNING CYCLE	MANAGEMENT & BUDGET CYCLE
APRIL		2nd Quarter Program Review		Mid-year performance reviews **		
4/15/86			2nd quarter CATS report due to HQ			
4/17/86		(** Performance Improvement Plans (PIPs) resulting from midyear performance review should be completed now, but no later than June, to apply to FY 86 performance.)				Final decisions on WLM appeals
4/20/86						M&BTF distributes WY targets by P.E. to appropriate DD (timing dependent on HQ
MAY			Internal control documentation revisions due to HQ		Air State Specific Guidance issued	Guidance on staffing charts issued
5/1/86	Organizations begin to identify areas for improved coordination/outputs					Operating Plan development begins
5/4/86						DDs complete negotiations on WY target and notify M&BTF of agreements/disputes.
5/11/86						M&BTF forwards disputes on WY targets to RA for resolution.

FY 87 PLANNING AND MANAGEMENT SYSTEM SCHEDULE

	PROGRAM PLANNING CYCLE	PROGRAM MANAGEMENT CYCLE	FMFIA CYCLE	PERFORMANCE STANDARD CYCLE	EXTERNAL PLANNING CYCLE	MANAGEMENT & BUDGET CYCLE
AY Cont						
5/16/86	PBB guidance on workplans issued					
5/19/86						Operating Plan due to HQ
5/31/86			Include FMFIA in draft organizational objectives			
JUNE					Waste State Specific Guidance Issued	
6/20/86	Draft organization objectives due to DRA					
6/26/86	DRA response on draft objectives		Vulnerability Assessments due to HQ			
JULY						
7/2/86	SPMS targets negotiated by AAs/DDs/RA	3rd Quarter Program Reviews				
7/11/86	Final objectives due to DRA					
7/15/86			3rd quarter CATS report due to HQ			
7/31/86			Vulnerability Assessment Ranking due from HQ			

FY 87 PLANNING AND MANAGEMENT SYSTEM SCHEDULE

	PROGRAM PLANNING CYCLE	PROGRAM MANAGEMENT CYCLE	FMFIA CYCLE	PERFORMANCE STANDARD CYCLE	EXTERNAL PLANNING CYCLE	MANAGEMENT & BUDGET CYCLE
AUGUST						
8/8/86	Draft organizational workplans due to DRA		Include FMFIA activities in draft workplan			
8/15/86	Submit final SPMS commitments to HQ (including State activities)			FY 86 performance appraisal and FY 87 performance agreement guidance issued		
8/20/86	DRA response on draft workplans					
8/29/86					Final FY 87 State program plans and grant applications received	
SEPTEMBER						
9/12/86	Final workplans due to DRA					Training plan issued
9/19/86	All final workplans approved					
9/30/86	Final SPMS targets published				FY 87 State program grants ready for award	

FY 87 PLANNING AND MANAGEMENT SYSTEM SCHEDULE

	PROGRAM PLANNING CYCLE	PROGRAM MANAGEMENT CYCLE	FMFIA CYCLE	PERFORMANCE STANDARD CYCLE	EXTERNAL PLANNING CYCLE	MANAGEMENT & BUDGET CYCLE
			---------- FY 87 BEGINS ----------			
OCTOBER						Organizational budgets in place
		4th Quarter Program Reviews at discretion of DRA				
10/10/86			Include FMFIA in performance standards	Performance Standards for Division/Office Directors due to ORA		
10/17/86				Division/Office Directors' performance standards completed		
10/15/86			4th quarter CATS Report due to HQ			
10/31/86			RA's FY 86 Annual Assurance letter	Performance appraisals due		
NOVEMBER					Memo issued outlining RA's "Close-out Visits" with State Directors	
11/1/86				Performance Standards due for all employees		
DECEMBER					RA "Close-out Visits" with State Directors	

FY 87 WORKPLAN

OBJECTIVE # _____

BRANCH/SECTION/UNIT: _____

PAGE ____ OF ____

MANAGER: _____

DATE _____

PROGRAM ELEMENT: _____

GOAL:

OBJECTIVE:

KEY ACTION STEPS	ORGAN. UNIT OR INDIVIDUAL RESPONSIBLE	DUE DATES	MONITORING	
			DATE	STATUS/CORRECTIVE ACTION

APPENDIX C