United States
Environmental Protection
Agency

Office of Solid Wesse and Emergency Response

SEPA

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TITLE: OERR COMMUNICATIONS PLANNING PROCESS

APPROVAL DATE: 9/28/88

EFFECTIVE DATE: 9/28/88

ORIGINATING OFFICE: OERR

3 FINAL

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STATUS: [] A- Pending OMB approval
[] B- Pending AA-OSWER approval

] C- For review &/or comment

] D- In development or circulating

REFERENCE (other documents):

headquarters

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/Cheryl Hawkins	os-200	OERR-IO	382-2180
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for notification of out		groups for OE	RR's regulatory,
policy and informational	activities.		
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). Signature of Lead Office Directives Coordinate	the C. Van &	pps	Date
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Name and Title of Approving Official Che	ryl A. Hawkins, (ERR Exec. Of	Date ficer 9/15/88
PA Form 1315-17 (Rev. 5-87) Previous editions	are obsolete.		

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

SEP 2 8 1988

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

Subject: OERR Communications Planning Proces -- Directive: 9230.2-01

From:

Henry L. Longest II, Director

Office of Emergency and Remedia ponse

To:

Timothy Fields, Jr., Director, ERD

Steve Lingle, Director, HSED

Paul Nadeau, Acting Director, HSCD

Clem Rastatter, Acting Deputy Director, OPM

This memorandum describes the purpose of the communications planning process, and briefly outlines the format, roles, and responsibilities for completing communications plans. A model communications plan is attached to this memorandum, as well as a copy of OSWER's guidance on communications planning. If you have any questions on the purpose or content of these documents, please contact Cheryl Hawkins, OERR Communications Coordinator, at FTS 382-2180.

PURPOSE OF COMMUNICATIONS PLANS

One of EPA's most important responsibilities is to inform the public, Congress, the regulated community, and other affected constituencies of Agency initiatives, accomplishments, and activities. The development and use of communications plans across EPA programs ensures that appropriate internal and external parties are identified and informed of program activities in a timely manner. Early preparation of these plans enables EPA to send clear, consistent and understandable messages to the appropriate parties. Communications plans also ensure that appropriate offices within EPA contribute to Agency communication efforts. The development and use of these plans is a priority of the Administrator.

WHEN TO PREPARE A COMMUNICATIONS PLAN

Agency actions for which communication plans must be prepared include, but are not limited to, regulatory announcements, releases of significant findings or results, policy changes, and program actions or decisions that may have national, State or local impact. The communications plan for any action requiring the Administrator or Assistant Administrator's signature must be included in the signature review package. Regional communications plans are required only for actions with multi-Regional or national implications.

CONTENT OF COMMUNICATIONS PLANS

In general, a communications plan is a one to four page document that outlines for EPA decision officials the internal and external interactions that are required in developing Agency decisions or actions. The plan also describes EPA's approach to notifying external groups once an Agency action or decision is approved. The completed document should describe the nature of the Agency action, background information on the potential impacts of the action, the parties to be contacted, notification channels and timing, and the outreach materials that are needed.

ROLES AND RESPONSIBILITIES

The individual staff person responsible for developing a major Agency action (e.g., regulation, policy, guidance document) also is responsible for developing the communications plan. The appropriate Branch Chief, OERR Communications Coordinator, OSWER Communications Coordinator, and Office of External Affairs representative must review and approve the plan before it is included in the signature review package. Responsibilities for implementing the plan will vary depending upon the identified outreach activities and target audience. The Office of External Affairs will assist in identifying the specific notification plan, including activity, notifying official and timeframe.

The use of communications plans will inform Superfund's diverse constituency of the Agency's proactive approach to implementing the program. These documents are part of OSWER's overall communications planning process, which is designed to identify major issues and actions, assess their implications and impact, and develop appropriate options for communicating the Agency's goals and accomplishments in a concise and consistent manner. I appreciate the effort you have taken to develop comprehensive communications plans, and encourage you and your staff to continue these efforts.

cc: Directors, Waste Management Division, Regions I, IV, V, VII and VIII

Director, Emergency and Remedial Response Division, Region II

Director, Air and Waste Management Division, Region II

Director, Hazardous Waste Management Division, Regions III and VI

Director, Toxic Waste Management Division, Region IX

Director, Hazardous Waste Division, Region X

MODEL

COMMUNICATIONS PLAN

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE OFFICE OF EMERGENCY AND REMEDIAL RESPONSE

TITLE:

Description:

Indicate the title of the item/action to be published/released (e.g., ANPRM, proposed rule, final rule, Report to Congress, guidance document, interim policy) in a couple of sentences. Include other known titles for the item/action.

Example:

The official title of this proposed rule is the "Amendment to the National Contingency Plan: Appendix A: Hazard Ranking System." It also is referred to as the "Revised HRS" proposed rule.

BACKGROUND:

Description:

Provide key background information describing activities leading up to the item/action. This section should be limited to a couple of paragraphs.

Example:

Response to releases of hazardous substances is a joint effort by Federal, State and local responders. Since State and local public safety and health organizations are normally the first government representatives at the scene of a hazardous substance release, they play a critical role in providing temporary emergency measures. The Superfund Amendments and Reauthorization Act of 1986 (SARA) added a new section to CERCLA to provide local governments with financial assistance for providing temporary emergency measures. Reimbursement under section 123 is limited to \$25,000 per single response, and reimbursement must not supplant local funds normally provided for response.

Local governments need to become familiar with the conditions and procedures set forth in this regulation and are encouraged to apply for reimbursement under the appropriate circumstances. Local governments also are encouraged to comment on this interim final regulation.

PURPOSE OF ACTION BEING TAKEN:

Description:

Summarize in a few, direct paragraphs the nature of the action, what the Agency is proposing to do, results of the action, and EPA's intent in taking the action.

Example:

The Hazard Ranking System (HRS) is a scoring system for sites or facilities with actual or threatened releases of hazardous substances, pollutants, and contaminants. The HRS is the primary basis for determining which hazardous waste sites are eligible for EPA's National Priorities List (NPL). The purpose of this rule is to revise the HRS according to the requirements of sections 105, 118, and 125 of SARA. The proposed rule amends the HRS to provide a more accurate evaluation of relative risks among sites.

CRUCIAL ISSUES:

Description:

List extremely important or difficult issues that could impact EPA's message or the public's reaction to the action/item.

Example:

Local governments are expected to react positively to this regulation and request reimbursement application packages. Meetings held with local government representatives during the development of this regulation, however, indicate that there may be some resistance to the "effective date" and notification requirements of the rule. Options papers on each of these issues can be found in the public docket for this rulemaking.

MESSAGE:

Description:

Describe in one paragraph the important features of the Agency item/action that need to be conveyed to the target audience.

Example:

The proposed regulation modifies the HRS to include the actual or potential risk due to the following factors: surface water contamination that may impact the human food

chain or recreational user; flooding at hazardous waste sites; air emissions from a site; and mobility of hazardous substances in the ground water and air pathways. New considerations that have been added to the HRS include: the risk of chronic or carcinogenic illnesses; an on-site pathway that reflects risk due to direct contact exposure; a larger number of sensitive environments; a greater weight for actual as opposed to potential threats to human health and the environment; and data on the type, quantity and volume of waste, as well as area of the site.

PROPOSED ANNOUNCEMENT DATE (TIMING):

Description:

Indicate key decision announcement, release, or notification date and if applicable, when is it likely to be announced/published in the Federal Register (FR). Indicate whether and, if applicable, when there will be a public comment period.

Example:

Section 105(c) of SARA requires the President to propose and finalize revisions to the HRS by April 17, 1988. EPA must begin using the revised HRS to evaluate sites for the NPL by October 17, 1988. EPA issued an ANPRM requesting comments and information to assist in revising the HRS in the Federal Register on April 9, 1987 (52 FR 11513). Timing for a communications release or announcement of this regulation is date of publication of the rule in the Federal Register.

COMMUNICATIONS MATERIALS:

Description:

List items needed and the person/office responsible for their preparation. Examples of necessary items include fact sheets, executive summaries, and Q's and A's. This information should be presented in table format, with those items currently available separated from those which are yet to be prepared.

Example:

Currently Available Communications Materials

Item

EPA Journal Reprint on HRS Process

John Heritage 382-4393

Source

Communications Materials To Be Prepared

<u>Item</u>	Preparer	Source
Fact Sheet	HSED	2 days prior to FR publication
Press Release	HSED/ OEA	2 days prior to FR publication

KEY AFFECTED GROUPS:

Description:

List broad constituencies who have been consulted/involved to date and those who may be affected, including commenters. Discuss expected reactions, to the extent known.

Example:

The following is a list of potential target audiences for OERR communications activities.

EPA Headquarters Regions States Congressional Committees/Staff Members of Congress Media Environmental Groups Trade Associations State/County/City Township Associations Labor Organizations Professional Societies Other Public Interest Groups State Legislators Governors Governors' DC Offices Other Federal Agencies International Organizations Colleges/Universities Site Residents General Public

EPA CONTACTS:

Description:

List program technical subject experts, as well as the OERR program office Communications Coordinator, OSWER Communications Coordinator, and OEA Communications Strategist.

Example:

Name	Office Affiliation/ Responsibility	Phone
Karen Burgan Cheryl Hawkins	OERR/Project Officer for LGR Rule OERR/Comm. Coordinator	382-3282 382-2180
Karen Ellenberger	OSWER/Comm. Coordinator	382-4617
Susan Bullard	OEA/Comm. Strategist	382-5199

NOTIFICATION PLAN:

List groups, committees, and constituencies who have been consulted and are to be notified, as well as any other interested/affected entities. Examples of groups include Congress, other Federal agencies, State/local governments or associations, environmental groups, trade associations, regulated industry, the press, and the general public. This information should be presented in table format. The Office of External Affairs will further refine the notification plan.

Example:

Interested Groups	Action	<u>Notifier</u>	<u>Timeframe</u>
Natural Resources Defense Council	Telephone call	Sue Jones 382-2000	Within 3 days of publication
American Mining Association	FR notice	OCIR weekly mailing	Within l week of publication
Senate Environment and Public Works Committee	Briefing	Diane Hicks/ HSCD 382-6200	Day of publication
House Energy and Commerce Committee	Briefing	Diane Hicks/ HSCD 382-6200	Day of publication

ORIGINATOR AND DATE:

Description:

Indicate name and title of individual who prepared the strategy. A signature is required on the final strategy, as well as the date prepared.

Example:

Karen Burgan.	Project	Officer,	ERD	Date

FY88/FY89 Anticipated OERR Actions/Items Requiring Communications Plans

Action	Responsible Office	Expected Publication				
NPL Update 6 (final rule)	HSED	2/89				
NPL Update 8: Federal Facilities	HSED/ OWPE	11/88				
Reportable Quantities: Carcinogens (final rule)	ERD	11/88				
Reportable Quantities: Radionuclides (final rule)	ERD	11/88				
Response Claims Regulation	HSCD	11/88				
Interim Treatability Levels for Soil and Debris for Superfund Sites	HSCD	2/89				
Hazard Ranking System (proposed rule)	HSED	11/88				
Reportable Quantities Adjustments: 274 CERCLA Hazardous Substances	ERD	11/88				
Federally-Permitted Releases (final rule)	ERD	7/89				
RI/FS Guidance (interim final)	HSCD	11/88				
ROD Guidance (interim final)	HSCD	11/88				
Worker Protection Standards (proposed rule)	ERD	9/88				
National Contingency Plan (proposed rule)	OPM	11/88				
State Participation Manual	HSCD	Pending Publication of the NCP				
ARARs Compliance Manual (draft, Volumes I, II, and III)	HSCD	3/89				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

JUN 2 2 1988

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT:

OSWER Communications Planning Process

FROM:

Jack McGraw

Deputy Assistant Administrator

TO:

OSWER Office Directors

Effective communications with the general public and affected/interested constituencies about EPA's activities and decisions continues to be a priority to the Administrator and the Agency. Because of public interest about the environment, EPA's programs are highly visible. It is imperative that managers and staff remain open and accessible to all members of the public to ensure we foster active public involvement and achieve public notification of Agency activities, actions, and decisions.

To date OSWER has been quite effective in implementing the Administrator's communications directive issued on June 24, 1987. To meet the goals stated in the Administrator's directive, OSWER's communications coordinator and program strategists have streamlined and refined our communications process and developed a basic framework for use by all OSWER programs in formulating communications plans. The attached guidance package provides you with a ready reference of communications materials, such as: general quidance on purpose, timing, implementation, responsibilities, etc.; steps in the communications planning process; format and elements of a communications plan; and format and elements of a fact sheet.

These materials will give your staff a solid basis for understanding and implementing OSWER's communications planning process. In addition, we have designated a cadre of skilled communications strategists in each program office who are ready to assist you in planning your communications activities. The attached guidance includes the primary contact in your program.

The communications planning process is important and requires the full support and commitment of you and your staff. To ensure your staff is aware of the requirements of and need for implementation of communications planning, I strongly urge you to distribute this guidance widely in your office and discuss it with your division directors, branch chiefs, and section chiefs.

Win and I appreciate the effort involved in our OSWER communications process, and we thank you and your communications strategists for a job well done over the last couple of years. Our continued success in presenting consistent and understandable messages about OSWER programs is evidenced by the public's enhanced appreciation of our programs.

Attachment

cc: Julie Klaas, OWPE
Mia Zmud/Jennifer Barker, OSW
Sherry Hawkins, OERR
Pam Garrow/Peg Rogers, OUST
Anastasia Watson, CEPP
Karen Ellenberger, OSWER
Tom Devine, OSWER
Elizabeth LaPointe, OSWER

GUIDANCE OSWER COMMUNICATIONS PLANNING

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OSWER COMMUNICATIONS PLANNING

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GUIDANCE ON OSWER COMMUNICATIONS PLANNING

What is a communications plan? What is its purpose?

All EPA programs, at the direction of the Administrator and in cooperation with the Office of External Affairs (OEA), prepare communications plan packages as part of each EPA decision package. OSWER communications plans describe how we will announce our actions or decisions to interested audiences. Communications plans enable EPA to:

- coordinate decision-specific communications activities;
- ensure EPA consensus about the nature and timing of announcements, that all necessary contacts are made, and that program announcements are consistent with Agency policy;
- identify appropriate people for notification of activity and ensure they are contacted in an orderly and timely manner;
- elicit comments and feedback from affected programs, organizations, committees, and individuals; and
- provide those notified with the information needed to intelligently act/react to OSWER's actions or decisions.

Effective communications with OSWER's many audiences is essential to the success of the program. This is closely connected both with EPA's and OSWER's commitment to an "open door" policy and with our determination to involve many different interest groups in the decisionmaking process. The implementation of a communications plan assures that all people within and outside of EPA are notified that an OSWER decision has been signed.

Early preparation of communications plans and distribution of drafts to appropriate personnel are essential. This permits coordination of OSWER messages with those of other programs and guarantees efficient dissemination of information to all interested people.

When is an OSWER communications plan needed?

An OSWER communications plan will be prepared for each:

- regulation (proposed and/or final)
- notice of availability
- new initiative
- policy statement
- Report to Congress
- major settlement
- announcement of studies/tests and results
- other actions which may elicit external OSWER interest

What are the steps in the communications planning process?

Basically, there is a network of specialists within OSWER and the Office of External Affairs who focus on communicating actions and decisions outside of OSWER. See attachment 1 (page 5) for the steps in the planning process.

What is the network for OSWER communications planning?

We have designated within each program office an OSWER program communications strategist. The program strategists are:

OSW - Mia Zmud (382-4651); Jennifer Barker (475-9350)

OERR - Sherry Hawkins (382-2180)

OUST - Pam Garrow (382-4799); Peg Rogers (382-5628)

OWPE - Julie Klaas (475-9831 or 382-2990)

CEPP - Anastasia Watson (475-7046)

Karen Ellenberger (382-4617) is OSWER's communications coordinator.

When you initiate an activity which requires a communications plan, you should contact your program's strategist for advice, guidance and assistance in the communications process and preparation of the plan.

It is essential that you notify your program's strategist of upcoming OSWER actions or decisions early in the process. Our goal is to have a first draft of the communications plan available for input and review one month prior to initiation of the action, with a final plan included as part of the final signature package. Although the action or decision being made may be altered during final review, it is important to have a first draft of the communications plan early in the process.

The OSWER coordinator and program strategists work with the Office of External Affairs (OEA) to obtain their input and review of the communications plan. OSWER and OEA jointly determine the need for any ancillary materials, such as press materials, Qs & As, etc. OEA also provides input as to interested and affected audiences who should be notified of our decision/action. Depending upon the issue or action, it may be necessary to convene a meeting between the program and OEA to discuss the issue.

Who is responsible for drafting an OSWER communications plan?

The person within the originating branch or division, usually the person drafting the document/rule, is responsible for preparing the accompanying communications plan. The plan should be drafted in conjunction with your program's communications strategist.

When is a communications plan initiated and drafted?

Initial steps for the communications plan should begin as soon as work on the decision document or rule is initiated. The originating office should begin by listing what must be communicated about the decision and who, within and outside of EPA, should be informed of the decision.

A communications plan is drafted at least one month before the decisions document or rule is completed. The plan is to accompany the package through OSWER internal review, at the beginning of the review stage.

What is the communications plan format?

Use the attached sample format adapting it to suit the specific action/decision. See attachment 2 (pages 6-8). Add or delete communications items, activities and people to contact, as appropriate.

(Note to Office of Solid Waste: OSW's communications process is managed on a data base. Do not use this form to draft your plans. Instead, contact the OSW communications strategist for a copy of your pre-prepared communications plan form.)

What documents are part of a communications package?

The basic communications package for routine actions includes (1) a 1-3 page communications plan, and (2) a fact sheet.

- (1) The 1-3 page communications plan provides concise information covering:
 - background information
 - action
 - crucial issues
 - message
 - proposed announcement date
 - communications materials needed
 - key affected groups
 - EPA contacts
 - notification plan
 - plan originator
 - date

This document is intended for <u>internal Agency us</u> <u>only</u>. See attachment 2 (pages 6-8) for a sample format wh <u>provides</u> additional information.

- (2) The 1-2 page fact sheet describes the action/decision and provides complementary and expanded information for people outside the Agency. The fact sheet covers:
 - background information on the issue
 - action being taken and prominent issues
 - findings/recommendations/conclusion

No particular format is required by the Agency for a fact sheet. However, OSNER has developed a sample format describing the necessary elements. See attachment 3 (page 9). We have developed OSWER/program-specific environmental fact sheet letterhead on which the fact sheet is to be typed. The office-specific fact sheet letterhead is available from your program communications strategist. Remember, the fact sheet is intended for external distribution, and is required for each communications plan.

How and when is the communications plan implemented?

When the decision or action is signed by the Administrator, his office will contact the OSWER Assistant Administrator's office to announce that the document has been signed. The AA's office will then contact the OSWER program communications strategist, who in conjunction with the technical program specialist, will begin implementing the communications plan.

STEPS IN THE OSWER COMMUNICATIONS PLANNING PROCESS

- - o need is defined as a regulation, notice of availability, new initiative, issuance of policy statement, Report to Congress, major settlement, study/test and results announcement, etc.
- Step 2 1 month prior to initiation of final review/signature process, OSWER program communications strategists to work with technical program specialists to develop draft communications plan
- Step 3 OSWER program communications specialists to provide draft plan to OSWER communications coordinator for dissemination to Office of External Affairs (OEA) for review; allow 2 weeks for review
 - o 1-2 page fact sheet for public consumption required with each plan
 - o OSWER program/OEA to jointly determine need for ancillary materials such as press release, Qs & As, executive summary, etc.
 - o meeting between program and OEA to discuss plan may be required
- Step 4 2 weeks prior to final review/signature process, OSWER/OEA comments provided back to OSWER program comunications strategists to incorporate input
- Step 5 communications plan, plus ancillary materials to be put into final form by program and included in signature package at start of final review/signature process o OSWER program communications strategists to provide revised version of plan to OSWER/OEA
- Step 6 after Administrator's signature, OEA to notify OSWER of event; OSWER communications coordinator to notify OSWER program communications strategist, who will work with technical program specialists to implement the notification activities required under the plan
- KEY: OSWER program communications strategists

 OERR Sherry Hawkins (382-2180)

 OWPE Julie Klaas (475-9381 or 382-2990)

 OUST Pam Garrow (382-4799) and Peg Rogers (382-5628)

 OSW Mia Zmud (382-4651) and Jennifer Barker (475-9350)

 CEPP Anastasia Watson (475-7046)
 - OSWER communications coordinator Karen Ellenberger (382-4617)
 - OEA communications strategist Susan Bullard (382-5660)

COMMUNICATIONS PLAN OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE (Program Office Designation)

TITLE:

- item to be published/released (ANPRM, proposed rule, final rule, Report to Congress, etc.) and title in a couple sentences
- include a.k.a. titles

BACKGROUND:

 key background information describing activities in a couple paragraphs

ACTION BEING TAKEN (PURPOSE):

- summarize in a few direct paragraphs the nature of the action, what we are proposing to do, result of the report, what our intent is in taking this action, etc.

CRUCIAL ISSUES:

- list extremely important or difficult issues which could impact our message or the public's reaction to this item

MESSAGE:

- describe in one paragraph important aspects we want to convey to the public

PROPOSED ANNOUNCEMENT DATE (TIMING):

- key decision announcement, release, or notification date; when is it likely to be announced/published in FR; (public comment period)

COMMUNICATIONS MATERIALS:

- list items needed and person/office responsible for preparation (examples include fact sheet, executive summary, Qs & As, etc.); set up in table format
- separate those items currently available from those which are to be prepared

Example:

Currently Available

Item

Source

EPA Journal Reprint

John Heritage 382-4393

Needed

Item	<u>Item</u> <u>Preparer</u>							
Fact Sheet	John Smith/OWPE 382-2222	2 days prior to FR publication						

KEY AFFECTED GROUPS:

- list broad constituencies who have been consulted and/or involved to date and those who may be affected (include commentors); discuss expected reaction; [OSWER to notify these constituencies]

EPA CONTACTS:

 list program technical subject experts as well as OSWER program office communications strategist, OSWER communications coordinator, and OEA strategist as follows

Name	Office Affiliation/ Responsibility	Phone
John Jones	OERR/Program Manager	382-2000
Sherry Hawkins	OERR/Comm. Strategist	382-2180
Karen Ellenberger	OSWER/Comm. Coordinator	382-4617
Susan Bullard	OEA/Comm. Strategist	382-5199

- Note: the last two names will be included on every strategy

NOTIFICATION PLAN:

- list groups, committees, constituencies who have been consulted and are to be notified as well as any other interested/affected entities; (examples of groups include Hill, other Federal agencies, state/local government or associations, environmental groups, trade associations, regulated industry, press, general public); list info in table format - Office of External Affairs will further refine the notification plan

Example:

Interested Group	Action	Notifier	<u>Timeframe</u>
Natural Resources Defense Council	call	Sue Jones 382-2000	w/in 3 days
American Mining Assoc.	FR notice	OCIR weekly mailing	w/in l week
Senate Environment/ Public Works	briefina	Diane Hicks/ program 382-6200	day of release
House Energy & Commerce	··	11	#

PLAN ORIGINATOR: Name and Title

(signature on <u>final</u>)

DATE:

United States Environmental Protection Agency Office of Solid Waste and Emergency Response Washington DC 20460

June 1988

SEPA

Environmental Fact Sheet

GUIDANCE FACT SHEETS ON OSWER ISSUES

Background Information

The majority of OSWER's issues are highly visible and are of interest to the public. It is important for us to provide the public with concise, consistent, and understandable information about our decisions and actions. One of the most effective means of communications is a fact sheet. As part of the communications planning process, a fact sheet will be required for each decision/action.

Action/Prominent Issues

The fact sheet should:

- (1) be 1-2 pages in length;
- (2) be reproduced on OSWER program-specific letterhead, which is available from your program communications specialist;
- (3) include the date in the upper right corner;
- (4) include the title of the decision/action;
- (5) present information either in narrative or bullet format covering:
 - background information on the issue
 - action being taken and prominent issues
 - findings/recommendations/conclusion; and
- (6) include a contact point for further information.

Conclusion

Remember, individuals and groups outside of the Agency are the audience for the fact sheet. It is important that the fact sheet we provide to our audiences conveys concise and understandable information.

Contact

For assistance in developing the fact sheet, contact your program communications strategist.