



# Procedural Manual

## Senior Environmental Employment Programs



## PREFACE

At a time of mounting pressure to constrain federal spending the Environmental Protection Agency is deeply concerned with the effective use of appropriated funds. Critical issues are the expeditious processing and efficient management of funds distributed through the grant award process to meet statutory requirements.

This procedural manual was developed for the National Workforce Development Staff, Office of the Assistant Administrator for Research and Development to meet the critical issues enumerated. While it has been designed to enhance the operations of the Senior Environmental Employment Program it is equally applicable to other grant programs authorized for the Environmental Protection Agency and listed in the Federal Catalogue of Domestic Assistance. The developmental, operational and management techniques are basic to any successful grant programs.

The following acknowledgements are in order:

Stephen J. Gage, Assistant Administrator, Office of Research and Development, for his consistent support of the development and enhancement of the environmental agencies human resources.

Patricia Powers, Acting Director, National Workforce Development Staff, Office of the Assistant Administrator, Research and Development, for her ideas, review, editing and stimulation.

Louis F. Gitto, Director, Management Division, Region I, for providing the time and administrative support.

Jeanne B. Bernard, my wife, for her patience, critical review, editing and comments.

Eugene K. Parker, Graphics Office, Management Division, Region I, for his consultation, advice and services in design and format.

Allyn St. Clair Richardson, Water Division, Region I, for his critical review of construction and verbiage.

Ruth A. Clougherty, Personnel Branch, Management Division, Region I, for typing and preparation of several drafts and the final copy.

The Christian Science Monitor, Boston, Massachusetts for permission to use the LePelley cartoon.

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PROCEDURAL MANUAL  
FOR  
SENIOR ENVIRONMENTAL EMPLOYMENT PROGRAMS

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## INTRODUCTION

### A. Purpose

This manual is designed to provide guidelines for employment of Senior Citizens in the environmental, ecological and energy areas of governmental effort.

### B. Objective

The conservation and utilization of talent and experience of Senior Citizens is of paramount importance to provide direct support to the wide range of statutory programs established by federal, state and local governments.

### C. Benefits

Current governmental retrenchment restricts activity in many areas and requires such augmentation as can be provided by Senior Citizens. Such augmentation permits the accomplishment of supplemental and crisis activities, enabling government agencies to more closely comply with their assigned and/or desired goals. The improvement in environmental health will be the direct benefit of the Senior Environmental Employment Program. The human factor benefits are also important and vital. Employment of Senior Citizens benefits the government directly, as well as the individual, with consequent improvement in individual well-being, raising of many incomes above the poverty level, and reducing demand on governmental income transfer and support programs.



D. Approach

The guidelines presented are set forth in a logical, progressive manner so as to enable the user to establish the fundamental basis and rationale for a specific program, its development, its conduct, and its closure. Through application of proper procedures, with attention to governmental constraints, Senior Environmental Employment Programs can be initiated and operated in an orderly fashion and produce the mutual benefits desired.

## I. DETERMINATION OF NEED.

The first task toward the establishment of any program is the identification and delineation of specific needs, and development of a rationale for meeting them. The rationale must be in harmony with statutory authority and agency policy to withstand the close scrutiny of repeated reviews. The chances of success will also be enhanced in proportion to its conformity with the specific priorities and methods favored by the reviewing and approving officials.

Often it happens that managers whose programs could benefit substantially from the augmented resources which the Senior Environmental Employment Program could provide are initially uninterested or even antagonistic to seemingly compelling arguments and demonstrable benefits. This attitude is just one more hurdle to be surmounted. The paradox of managers who consistently decry the insufficiency of personnel resources for meeting targeted objectives on schedule, and at the same time resist accepting proffered help in an innovative format, is not at all unusual. Such inconsistent management attitudes must be approached obliquely and with diplomacy, since direct confrontation is sure to harden opposition and defeat efforts to provide needed assistance.

The following outline provides the essential steps required to develop a supportive program. In some cases, enlightened management concerned with human resources will provide invaluable help. In some cases, it will be necessary to conduct the research and investigation without initial program participation.

## Factors for Determination of Need

### A. Research Legal Authorizations

#### 1. Applicable Public Laws

Acquire information covering the broad agency charges and goals for the specific program. A list of these will provide a check sheet or control for subsequent steps.

#### 2. Applicable Federal Regulations

Obtain information covering the agency response in carrying out the public laws and the specific agency regulations and policy directives. The data obtained here when compared to section A.1, will provide information indicating which elements of public law the agency intends to prosecute and which elements to play down, thus narrowing the areas of consideration.

#### 3. Applicable Zero-Based Program Budget

This review will provide information covering the immediate, short-term agency objectives and priorities. This information when compared to sections A.1 and A.2 will further refine the agency commitments and directly indicate the activities in need of support.

### B. Review Organizational Structure and Functions.

The information developed in this study, when compared to results obtained in Section A will indicate the strengths and weaknesses of the program organization. Frequently one may find that concentration upon the end-results specified in the objectives and goals results in overlooking some of the basic elements required to at-



tain those goals. This may lead to imbalance of resources provided for management, administrative, professional, technical, and clerical functions.

C. Development of Preliminary Proposal

The application of problem identification and problem solving techniques in the investigative and analytical work accomplished in Sections A & B will provide the specific areas of need, human resource requirements, and specific skills necessary to support the activity and improve its productivity. While this information provides the essential elements of the preliminary proposal, exceptional care is required in its construction, to address the particular interests of the individual manager to whom it will be presented and to emphasize the organizational and programmatic benefits to that individual.

## II. DEVELOPMENT OF RESOURCES.

Completion of Section I determinations will provide the program developer with the basic information required to consider the available resources, the providers, and the rationale or justification for the use. In some instances the program developer will have initiated action and completed all parts of Section I. In other instances where program administrators have instigated requests, it may be necessary for the program developer to confer with the program administrator to obtain the essential elements of information necessary to establish a sound basis for justification.

In either case, the program developer will now be prepared to review the variety of senior and other applicable programs and options, to analyze and select the most appropriate source, and to determine the degree of involvement and support to be provided by the program desiring augmentation. This last point is one to be stressed.

The agency to be supported must make a commitment and become involved in support of the senior program assistance to be provided. Commitment of resources for administration, for limited supervisory activity, and for limited orientation and training are essential. All or a combination of these must be an inherent part of the agreement. Programs which provide "free" support to an agency, without some direct involvement by the supported agency are doomed to failure and should be eliminated at this point. Pro-

gram administrators who have the vision to invest a very small portion of their allocated resources in order to expand their staff efforts obtain the maximum benefits.

The following outline provides a selection of the resources to be reviewed for determining those most suitable and appropriate for the particular project. This list may not be considered all-inclusive because of the vagaries regularly experienced in the statutory authorization, appropriation, and administrative processes of the governmental system. Maintaining a continual awareness of changes in support programs and their implications is an essential activity for the program developer. It must always be considered that the basic intent of federal subsidized employment programs is to lead to unsubsidized employment, and this is one of the critical evaluation factors in determining a program's success.

#### Senior Employment Programs

- A - Senior Environmental Employment Corps
- B - Senior Community Service Employment Programs
- C - Comprehensive Employment and Training Programs
- D - Senior Opportunities and Services
- E - Retired Senior Volunteer Program
- F - Volunteers in Service to America
- G - State Volunteer Services Coordinator Program
- H - Environmental Protection Agency Grants Assistance Programs
- I - Catalogue of Federal Domestic Assistance (Basic Reference)

### III. INVESTIGATION OF METHODS OF IMPLEMENTATION

The basic work accomplished in Sections I & II provide the program developer with the information required to compare the desired program objectives with the range of potential resources selected. The program developer is now faced with making decisions that will directly influence successful initiation of the program and its ultimate consummation. Objectivity will be established that will clarify many of the specific details essential to preparation of official documents.

#### A. Analyze in Detail the Elements of the Selected Funding Source

The following elements are generally found in the Catalogue of Federal Domestic Assistance.

1. Federal Agency
2. Authorization
3. Objectives
4. Types of Assistance
5. Uses
6. Use Restrictions
7. Eligibility Requirements
8. Application and Award Process
9. Assistance Considerations
10. Post Assistance Requirements
11. Financial Information
12. Criteria for Selection

Completion of the above will enable the program developer to firmly establish the proper match between the desired program and the selected funding resource. Occasionally at this point some adjustments in the program objectives may be required to mesh more closely with the objectives of the funding resource. Some flexibility on the part of the agency receiving support is essential to meet the demands of the supplier of assistance and enhance the potential for procurement of funds. Understanding of the restrictions and requirements placed upon the supplier is fundamental to obtaining the interest in and favorable reception of a proposal.

B. Draft the Proposal

1. Purpose
2. Beneficiaries
3. Social and Economic Costs
4. Nature of the Problem (substantiated)
5. Alternatives, or Implications Upon Project Completion
6. Manner in Which Problem Will Be Solved
7. How Resources Will Be Used
8. Budget Construction
9. Evaluation Design
10. Reporting System

This draft constitutes the working paper and basic resource for preparation of the formal application. It will supply the essential information required. Continuous attention must be exercised to effect coordination of the parts and selection of verbiage to ensure that the proposal combines the objectives of both the supplier and the recipient with clarity. Mutual objectives and benefits must be firmly established. A sound, factual presentation promotes favorable reception.

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049	EHAD				
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264 1	Boston, MA : #b United States Environmental Protection Agency, Region I, Office of Regional Workforce Coordinator, #c 1981.				
300	iii, 32 pages : #b table ; #c 28 cm				
336	text #b txt #2 rdacontent				
337	unmediated #b n #2 rdamedia				
338	volume #b nc #2 rdacarrier				
500	Cover title.				
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710 1	<u>United States</u> #b <u>Environmental Protection Agency</u> #b <u>Region I</u> #b Office of Regional Workforce Coordinator, #e issuing body.				

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#### IV. ISSUANCE OF OFFICIAL DOCUMENT.

The previous steps have been preparatory to this critical and essential function of completing the issuance of official documentation that is agreeable to all parties involved in the specific project. The basic purpose of such documentation is to obtain official approval and funding for the project. Whatever form of documentation is chosen, it is a legal agreement between the parties constructed clearly and concisely to assure mutual understanding and to obviate future disagreement in interpretation.

##### A. Critical Elements of Construction

##### 1. Selection of Appropriate Vehicle

- a. Contract
- b. Grant
- c. Cooperative Agreement
- d. Interagency Agreement
- e. Intra-agency Agreement

##### 2. Selection of Appropriate Funding

- a. Appropriation
- b. Account(s)
- c. Program Media
- d. Agency Code

3. Determination of Authorizing Official
  - a. Name
  - b. Title
  - c. Authority Delegation
4. Determination of Currently Required Forms
  - a. Environmental Protection Agency
  - b. Other Agencies
5. Method for Transfer of Funds to Issuing Unit, Department, Bureau or Division
6. Detailed Understanding of Specific Forms Packet to be Used, Including Ancillary Certifications and Depositions
7. Detailed Understanding of Procedural Routes Required to Obtain Approval
  - a. Internal
  - b. External
8. Determination of Congressional Districts Which Will Be Impacted by the Project
9. Careful, Complete and Accurate Execution of Required Forms
10. Preparation of the Narrative Description
  - a. Project Objectives
  - b. Requirement for the Project
  - c. Activities to be Conducted
  - d. Rationale for the Methods to be Used
  - e. Resources and Staff Required for the Project

- f. Reasons the Methods Chosen are Preferable to Other Options or Alternatives
  - g. Schedule of Proposed Time Frames for Elements of the Project
  - h. Proposed Evaluation Design
  - i. Progress Reporting System, Including Frequency and Format
- 11. Preparation of the Detailed Budget
  - a. Justify Each Line Item of the Budget by Listing Basic Costs and Computations
  - b. Rationale for Selection of Method of Funding Chosen
  - c. Financial Reporting System, Including Frequency and Format
  - d. Conformance with Applicable Office of Management and Budget Circulars
- B. Method Chosen for Processing of Forms Through the System and Anticipated Time Frame
  - 1. Expediting by Hand Carrying Through the Administrative Offices Personal Delivery and Pick Up (one week)
  - 2. Expediting by Telephone Follow Up on a Weekly Basis (one month)
  - 3. Routine (Two to three months)

The above covers essential details involved in the formulation of legal documents necessary to initiate a project. Throughout this formalization process complete coordination is implied. Developing an understanding with and tacit agreement by the processing officer during construction of formal documents is a cardinal activity. Preparation for satisfactory processing of the documents, reduces delays and obviates requirements for

reworking and reprocessing of the instrument. Development of cooperative relations with program management, financial management, grants management and/or contracts management during the preparatory stage provides reasonable assurance that the documents will adhere more closely to their critical review requirements and will be subject to more expeditious handling.

## V. MONITORING, EVALUATION AND REPORTING SYSTEMS.

Components of the official document indicate intended actions to be taken by the recipient of the award in reporting and evaluating the progress and financial status of the activity. Coordination during the drafting of the application has developed the key items required by the awarding agency to maintain continuous supervision of the project, to determine effective operation and to assure proper use of funds in a timely manner. The awarding agency must determine what additional actions it must take to supplement the written reports submitted by the project manager.

Establishment of internal controls by the project officer may be accomplished through the use of a performance and evaluation review technique or similar system. The following outline suggests key points for consideration. Other factors may be added to meet special needs of a particular award.

### A. Progress Reports by Project Manager

1. Frequency
2. Timeliness
3. Adequacy
4. Accuracy
5. Processing by Project Officer

B. Financial Reports by Project Manager

1. Frequency
2. Timeliness
3. Adequacy
4. Accuracy
5. Processing by Project Officer

C. Evaluation Reports by Project Manager

1. Frequency
2. Timeliness
3. Adequacy
4. Accuracy
5. Soundness of Recommendations
6. Processing by Project Officer

D. Progress Review by Project Officer

1. Frequency
2. Distribution List
3. Dissemination

E. Financial Review by Project Officer

1. Frequency
2. Analysis (Rate of line item expenditures with respect to plan)
3. Adjustment (Issuance of amendments when appropriate)

F. Monitoring by Project Officer

1. Personal Visitations to Site

- a. Frequency
- b. Report Format
- c. Dissemination

2. Telephone Visitations

- a. Frequency
- b. Report Format
- c. Dissemination

G. Ongoing Evaluation by Project Officer

- 1. Frequency
- 2. Corrective Actions (where required)
- 3. Report Format

H. Final Evaluation by Project Officer

- 1. Review and Comment on Project Manager's Evaluation Report
- 2. Project History
- 3. Relative Attainment of Objectives
- 4. Benefits
- 5. Negative Observations
- 6. Recommendations
- 7. Dissemination

Scheduling of the above events and requiring promptness in meeting the schedule enables the project manager and the project officer to take appropriate corrective action to eliminate unanticipated deficiencies.



Such action enhances the opportunity for completing the project successfully and promotes the most efficient use of government funds. Each event must be considered and acted upon as an entity, even though the schedule may indicate several events occur simultaneously.

## VI. EXECUTION OF CONTROLS.

Systematic control of federal funds allocated to federally sponsored activities, as developed in Section V, is an effective procedure to attain optimum results. The bases and authorities for such controls are numerous; however, their prime legitimacy evolves from the executed legal document establishing the project and approving the specific use of funds. Certain restrictions exist in the application of controls to a contract, a grant, a cooperative agreement or other types of agreement. Such applicable restrictions should have been one of the factors considered in selecting the proper instrument for the specific activity, so that exercise of such control will be no surprise to the Project Manager.

The following list encompasses some controls that generally apply to all types of instruments and should be exercised.

### A. Project Progress

1. Require prompt submission of progress reports in accordance with established schedule.
2. Acknowledge receipt of report promptly and include remarks regarding attainments and deficiencies with recommendations to the Project Manager for corrective actions.
3. Reference attainments to anticipated milestones, intermediate objectives or to final objective as a measure of progress.

B. Financial Expenditures

1. Require prompt submission of financial reports in accordance with established schedule.
2. Acknowledge receipt of report promptly. Include remarks regarding proportions of budgeted line items and total project expenditures used relative to the proportion of progress attained in the project. Notify the project manager of recommendations for corrective actions, where appropriate.

C. Personal Site Monitoring

1. Visit project manager and discuss overall activities, financial expenditures, and progress toward intermediate and final objectives.
2. Visit a random sample of persons actively involved in prosecution of the project at their normal work site.
3. Review and spot check the project personnel, legal, progress, and financial records, maintained by the project manager's office.
4. Discuss findings and observations with the project manager, making appropriate recommendations.
5. Prepare report of visit.

D. Telephone Monitoring

1. Initiate regularly scheduled telephone communication with the project manager to discuss problems and establish project officer's continued interest in the project.

2. Respond promptly to project manager's calls and inquiries with authoritative information and suggestions.
  3. Maintain record of conversations and their content.
- E. Control Actions Available to the Project Officer
1. Recommendations
  2. Directives
  3. Amendment to the award
  4. Withholding of interim funding reimbursement pending corrective actions by the project manager
  5. Request for audit/investigation of the project where flagrant misuse of funds, violations of agreement and failure to take corrective action is noted.
  6. Cancellation of the award

Controls should be exercised to enhance the mutual agreement, to develop the common interest in successful accomplishment of the project objectives and to promote a spirit of cooperative effort between the project officer and the project manager. Negotiation as a means of resolution of operational problems is the preferable and the most successful method of carrying the project through to successful conclusion. The use of threats, intimidation and adverse actions must be reserved for crisis situations. Such maneuvers are generally deleterious to interpersonal relations and to the project itself.

Emphasis has been placed upon adherence to the agreement, record keeping and continuity for the protection of both the project officer and the project manager. This approach has been designed to obviate professional and financial embarrassment from adverse action recommendations resulting from audit/investigation subsequent to completion of the project.

## VII. COORDINATION OF OPERATIONAL ELEMENTS.

In the preceding part, "Execution of Controls," emphasis was placed upon the direct relations between the project officer and the project manager. These two are the chief protagonists in the prosecution of a successful project. However, they are not the only interested parties. Involvement is required of all persons and agencies interested in the project.

Continual awareness of the status and progress of the project among all interested elements is most desirable, for it continually displays the progress being made in the project and the problems being encountered. Frequently, operational problems can be resolved as a result of discussions with those sponsoring or interested in the project and from their observations, even though they are not directly involved in the control process.

The project officer and the project manager must be sensitive and flexible in their response to minor changes or adjustments in project objectives and procedures which frequently arise during management of the project. Such changes are inevitable, since no plan, however well conceived, will function perfectly when placed in operation. The primary responsibility for making necessary project adjustments falls upon the two principal operating officers who have the authority to initiate and execute the procedures required to implement the changes.

## VIII. DISSEMINATION OF INFORMATION.

The progress of any project is measured by the collection and analysis of information during its operation. In previous sections we have considered information flow under "Monitoring, Evaluation and Reporting Systems" and "Execution of Controls". These are primarily oriented towards the program management level. Other resources of information that should be tapped are the characteristics and reactions of the participating workers in the project. Together, these two resources provide the information required to evaluate the project management, operation, progress and reception. This is essential to the development of a plan for dissemination of information which will maintain a continuing interest in the project and a public awareness of the activities.

The following is an outline of key points for consideration in establishing an information distribution plan.

### A. Execution of Agreement

1. Distribution
2. News Release

### B. Progress Reports

1. Distribution
2. News Release

### C. Financial Reports

1. Distribution



D. Monitoring Reports

1. Distribution
2. News Release

E. Participant Surveys

1. Distribution of Results
2. News Release

F. Final Report

1. Distribution
2. News Release

All of the above are covered specifically in separate sections, with the exception of Participant Surveys. These are an important part of the information flow process and provide a balance to the information obtained from the project management information system. Care should <sup>be</sup> ~~be~~ taken in construction of the participant surveys to exclude material obtained from the progress and financial reports, to include additional information necessary, to refine the selected data base and to provide material for development of human interest aspects of the project. The survey forms developed by the Foundation for Applied Research for the model Senior Environmental Employment Program (1977-1979) may be used as a format and adapted to suit the specific project. Reference to the General Accounting Office report Number HRD-75-95 of September 20, 1979, "Conditions of Older People" will be helpful in preparing a section addressed to the effects of the employment provided on the well being of senior participants in the project. Compatibility with the other agency data systems, or elements thereof, will enhance the value of the collection effort.

It must be noted that the outline suggests consideration of a news release in each case, except for financial reports. While each element provides some information suitable for public release, it is most practical to schedule periodic or regular news releases to include essential information collected from the various sources. The news release schedule should be coordinated with the schedule of submissions for the reporting sources.

## IX. PHASING OUT PROGRAMS.

The proper closing of a program is a critical stage for all parties concerned. Those involved; the sponsor, project officer, project manager, and participants, have a specific interest in the successful culmination of the project. Each have special concerns and a different set of value judgements to be addressed and accommodated at this juncture. On the assumption that the monitoring, evaluation, reporting, and control systems have been executed in accordance with the plans, the project officer and the project manager are in a position to close the project with a minimum of effort. Active involvement and supervision will have provided the background and the material for this action.

### Checklist of Closure Actions Usually Required:

- A. Review of Official Document File
  - 1. Basic Document
  - 2. Amendments or Change Orders
- B. Review of Progress Report File
  - 1. Complete File of Regular Reports
  - 2. Timely Submission Record
- C. Review of Financial Report File
  - 1. Complete File of Regular Reports
  - 2. Timely Submission Record
  - 3. Final Balances by Line Item and Total
- D. Review of Monitoring Report File
  - 1. Complete File
  - 2. Timely Preparation Record

## X. FINAL REPORTS.

All of the preceding actions, assiduously accomplished, are preparatory to the construction of the final reports. Two of these are required; the final narrative progress report and the final financial report. These should be composed to present a complete picture of the project as conducted. The following outline suggests elements of the report that should be considered in its development.

### A. History

1. Rationale for the Project
2. Project Objective
3. Funding Development and Processing

### B. Operations

1. Initiation or Start-Up
2. Operational Functions
3. Administrative Functions
4. Phasing out Procedures

### C. Conclusions and Recommendations

1. Comments and Observations on each of the above Items
2. Data Representation Supporting Comments
  - a. Personnel Analysis
  - b. Financial Analysis
  - c. Attainment of Objectives

### 3. Recommendations

- a. Statutory
- b. Administrative
- c. Financial
- d. Successive Activities

The final financial report should be completed on a form provided by the appropriate agency administrative office, after closing of the project. It essentially comprises a balancing of items designated in the budget with actual expenditures. It thus enables an expeditious transfer of funds between the parties, where warranted, to close the account.

A news release would be most appropriate to accompany the final progress report. It should display the effectiveness and viability of the project and should include visual representations, media accounts and other material establishing the appropriate use of public funds. The beneficial results of the project should be stressed.

## XI. RETROSPECTION.

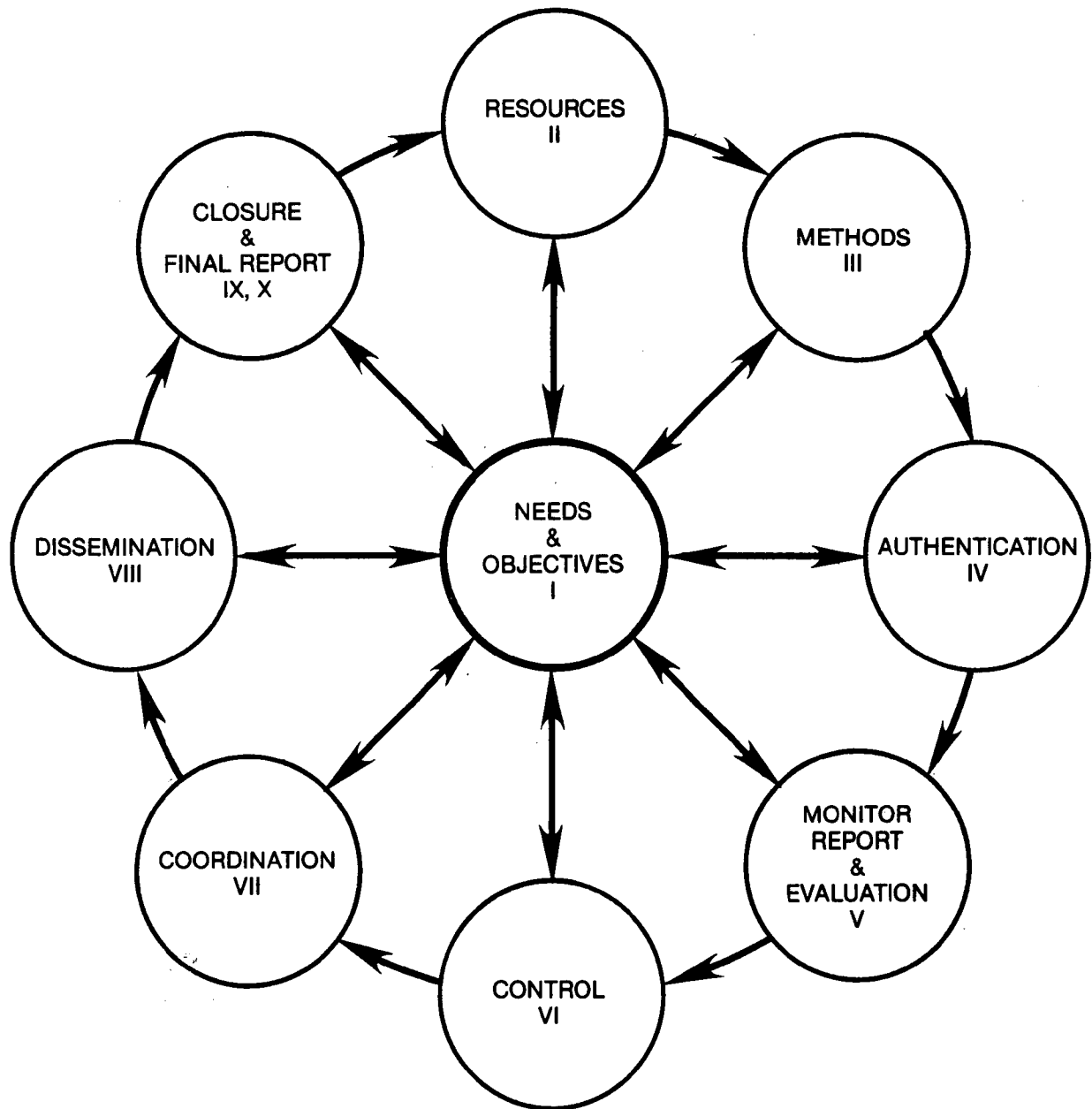
In this manual, you have been exposed to an orderly, progressive approach to the development, validation, authorization, operation, control, and cessation of a project. Every attempt has been made to provide a rational guide or pathway to follow and execute. You may have noted periodic references to statutes, authorities, regulations, circulars or other such directives. No attempt has been made to specifically detail or list such restraints. To do so would have resulted in a manual that would be excessively voluminous and distracting to the basic intent. In addition to confusing the reader, it would result in rapid obsolescence of the manual due to periodic changes in government directives.

What is displayed are the principles and procedures to be applied in order to prosecute a program or project successfully. To do this you are faced with the application of planning, organizational and management principles. The details to be attentively prosecuted are emphasized. With an understanding of the reasons for these details, your approach and prosecution will be constructive and productive. Granted that such details are restrictive, they are the result of previous experiences and problems such as inappropriate and sometimes illegal use of resources. They represent the bureaucratic response to such improper activities, an effective means of avoiding such problems, and are designed primarily for the protection of both the government and other involved parties. Provision of this information to those required to execute various facets of the project will generally produce psychological acceptance and a more positive response.

The attached graphic in figure 1 depicts the procedures in a simplified manner. It is supplied on a separate page in order that you may make a copy and post it as a constant reminder. It is constructed in the shape of a wheel to represent the interlocking continuity described in preceding sections. The numbers refer to the specific sections of the manual and display the order or progression of procedures. The hub or axis of the wheel is the key element to be supported. This is vital. Every step in the process must refer to the objectives at all times and in every consideration to ensure successful accomplishment.



**SENIOR ENVIRONMENTAL EMPLOYMENT PROGRAM  
PROCEDURES**



**FIGURE 1**