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	U· S· DEPARTMENT OF THE INTERIOR OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT DIRECTIVES SYSTEM	Subject Number: OPM -10 Transmittal Number: 238 Date: 11/06/84

Subject: Policy Guidance and Instructions for OSM Organizational Changes

Approval: John S. Ward **Title:**

1. Purpose. This directive provides procedures and guidance for controlling and managing the Office of Surface Mining's (OSM) organization structure, including: changes in organizational structure, assignment or realignment of functions and/or relationships; establishment, abolishment, or relocation of Technical Service Centers; Field Offices or Area Offices; and changes in field boundaries.

2. Definitions.

a. Organizational Change. A change in structure, function or reporting relationship, including the establishment, abolition, division or relocation of divisions, branches, staffs, Field and Area Offices, Technical Centers, or other organizational components. Included are changes in reporting relationships of affected organizational components as reflected in functional statements.

b. Functional/Statement Change. A change in objectives for which an organizational component is responsible. A functional statement describes the responsibilities of an organizational component.

c. Realignment. A redistribution of functions within an existing organizational component without a change to its structure.

d. Organizational Component. Any directorate, staff, division, branch, Field/Area Office, Technical Service Center or section within OSM.

e. Staff. A component of employees with specialized duties reporting directly to a supervisor.

f. Directorate. A major internal organizational component responsible for specific OSM program areas.

g. Field Office/Technical Service Center (East/West). Subordinate field organizational component of a Directorate responsible for managing OSM's programs in a particular area of jurisdiction.

h. Area Office. Subordinate organizational component of a Field Office responsible for programs in a particular area of jurisdiction.

i. Division. First level subordinate organizational component of a Directorate for Headquarters, and the East/West Technical Service Centers.

j. Branch. Subordinate organizational component of a division in Headquarters, East/West Technical Service Center, and Field Offices with the exception of Area Offices.

k. Section. Subordinate organizational component of a branch.

3. Policy/Responsibilities.

a. Policy. It is the policy of OSM to control and to centrally coordinate all organizational changes. A uniform set of procedures will be followed to ensure that agency organizational components are operating within the framework of roles, responsibilities and organization management criteria established by this agency. To implement this policy, procedures and requirements are established to assure that:

1. Management consideration, review, and decisionmaking is provided for organizational change proposals.

2. OSM's organizational components are organized in the optimum manner consistent with Departmental, as well as, internal policies, standards and concepts.

3. Timely action is taken on requests for organizational change.

4. A framework is provided for preparation and review of official organizational documents; specifically, organizational charts, functional statements, and tables of organization.

5. Employees are informed of major organizational change.

6. Representatives of affected employees are provided timely information and, as appropriate, opportunities to consult or negotiate on proposed organizational changes.

b. Scope. The policies and procedures of this directive apply to all OSM organizational components.

c. Responsibilities. Responsibilities for OSM organizational components are as follows:

(1) Director/Deputy.

(a) Responsible for overall organization control.

(b) Responsible for approval of all OSM organizational changes at the Divisional level and above; Field and Area Office/Technical Service Center relocations.

(c) Responsible for making the final decisions when there is a disagreement on changes occurring at the branch level and below.

(2) Program Evaluation Staff, Office of the Director

(a) Ensures the implementation of this directive and overall organization control.

(b) Serves as the focal point for coordinating all organizational changes.

(c) Reviews all changes in organization and function and recommends appropriate action to the Director/Deputy Director for those changes at the division level and above and coordinates those changes with the Department. Recommends appropriate action to Assistant Directors on branch level changes and below.

(d) Ensures that proper systems are in place and utilized to control all organizational and functional changes.

(e) Conducts periodic evaluations on the effectiveness of the existing organizational structure.

(f) Coordinates all organizational proposals and functional realignments within the agency and obtains concurrences from the Division of Personnel and the Division of Planning and Budget, where applicable.

(g) Coordinates with the Equal Opportunity Officer to ensure organizational changes, particularly relocations, are accomplished in a manner which avoids adverse impact on OSM minority and women employees.

(h) Provides guidance, support, and assistance to all OSM elements initiating organizational or functional change proposals and consolidates all comments on organizational changes in the approval process.

(i) Develops implementation plans and an announcement explaining the major changes in the organization structure.

(j) Advises the Personnel Officer of organizational change proposals to ensure position management considerations are enforced and coordination with the Union, as appropriate.

(3) Assistant Directors.

(a) Enforces the requirements and procedures of this directive.

(b) Reviews and approves organizational change proposals for branch level and below, including the Technical Service Centers and Field/Area Office changes after obtaining necessary approval/concurrence from the Program Evaluation Staff.

(c) Ensures that all necessary documents for processing organizational changes and subsequent personnel actions are properly submitted, such as tables of organization, justifications, functional statements, requests for personnel actions (SF-52), etc.

(4) Assistant Director for Budget and Administration.

(a) Ensures that proposed position descriptions are in conformance with the approved organization mission and functional responsibilities.

(b) Reviews organizational proposals for budget and program integrity, compliance with position management guidelines/criteria and current labor management agreements.

(c) Adjusts budget structure and resource allocations for approved changes.

(d) Provides support and assistance to OSM offices initiating organizational or functional changes on personnel and budget matters.

4. Procedures.

This section addresses the overall procedures and necessary steps for internal organizational changes regardless of level of approval required. The items listed are intended not only as procedures but also as a means to provide a thorough and organized analysis of organizational change proposals. Proposals that require Departmental approval should be submitted in memorandum form to the Director through channels as outlined in this directive. Assistance in developing or analyzing a proposal may be requested from the Program Evaluation Staff, Office of the Director. Proposals for organizational change at the branch level and below should be submitted in memorandum form to the applicable Assistant Director for approval/concurrence of the Program Evaluation Staff.

(a) Decision/Approval Document.

Decisions on all organization changes regardless of approval level must be documented. The document can be in the form of a memorandum or decision document indicating concurrence of the appropriate official.

(b) Organization Proposal Format.

All changes in the organization must be assessed to determine if the action is needed. The proposal must be submitted in a format that includes:

(1) A description of the proposed change. This should consist of a statement explaining the change and how the organization will be affected. Field organization structures will comply with standard Federal Region boundaries and Office of Management and Budget Circular A-105.

(2) Justification. A description of the reasons why the change is necessary and the rationale for the structure selected. (i.e. shifts in program emphasis or improved efficiency)

(3) Workload Analysis. A description of current workload and the manner in which the proposed change will affect future workloads.

(4) Management Effects. A summary of program accomplishments and any increase or decrease in management effectiveness.

(5) Staffing. An explanation of any increase and/or decrease in staff and any adverse impacts of the change, e.g., position abolishment or downgrade, geographical relocation, equal opportunity workforce profile, changes in promotion potential, changes in type of work being performed, automation of work previously performed manually, etc. Separately identify present and proposed staffing patterns.

(6) Organizational Charts. An organization chart reflecting the proposed organization with proposed functional statements of each component clearly described.

(7) Position Management. A description of the position management aspects and shortcomings of the proposals, including, if appropriate, the rationale for additional positions. Any increase in positions associated with the proposed organizational change must be within the approved budget and personnel resources available to OSM. If a position increase is required, the additional positions must be available and authorized by the Assistant Director for Budget and Administration before the proposals will be approved. If positions are to be taken from some other organizational unit, the source of these positions should be indicated as well as the impact on the overall organization. Any proposed increase which will result in a change in the supervisor/employee ratio or average grade must be documented. The creation of special assistants or other positions must also be justified and approved by the respective Assistant Director.

(c) Organizational Analysis or Study.

Organizational changes which involve the establishment, abolishment or relocation of an office to another town or city must be fully analyzed and justified. Included are major jurisdictional tranfers or changes which are inconsistent with OSM's organization structure in section 116 DM 1-6. All major changes of this type must be approved by the Director and the Department.

(d) Implementation Plan.

With major organizational changes, a smooth transition to the new operations should be carefully planned, developed, and implemented. The Program Evaluation Staff has lead responsibility for coordinating the planned change.

(e) Organizational Change, Field Office, and Technical Service Center Reorganization/Relocation.

In addition to the items listed in Section (b) on organization proposal format, for each potential alternative considered for relocations/reorganizations, the following, at a minimum, must be discussed:

(1) Name and Location. Include the name and location of all offices listed as the first, second, or third alternative.

(2) Effect on Public and Other Agencies. Assess and describe the impacts each alternative would have on the public and other agencies which are contacted on a frequent basis. Items considered should include convenience of reaching the appropriate office, availability, authority of appropriate managers and staff and OSM capability to respond and provide public service.

(3) Employee Considerations. Assess the impact on employees if they would be required to transfer due to the location change and estimate the number and kinds of employees who would transfer to the new location and those who would not. This includes all of the relocation costs involved, such as moving expenses, real estate reimbursements, severance pay, and other costs. The anticipated impact on employees should be discussed and plans to manage employee impact developed.

(4) Community, Social, and Economic Impacts. Assess and describe what effect the abolishment, establishment, or location change would have on the communities affected.

(5) Space Management. Provide analysis of the availability and estimated cost of office and warehouse space at any new location. Estimate lead time to acquire necessary space, considering GSA processing time, if appropriate. If temporary space arrangements are planned, then provisions for both temporary and permanent space must be discussed. Assistance is available from the Headquarters Branch of General Services.

(f) Cost Considerations.

One-time as well as continuing cost considerations must be developed and analyzed for each alternative. All of the costs should be translated into dollars even though data may be collected using other measures (i.e. work-months, miles travelled, etc.). The total cost or benefit for each alternative should be calculated and all alternatives discussed. Items which should be discussed are:

(1) One-Time Cost Considerations.

(a) Implementation. The costs of internal OSM administrative processes associated with implementing the alternative.

(b) Facilities Costs. The costs of constructing, renovating, or leasing office space and other facilities.

(c) Office Equipment. The cost for securing and installing office equipment necessary for effective operation of the facility.

(d) Employee Relocation. The costs associated with moving employees from one duty station to another.

(2) Continuing Cost Considerations.

(a) Travel. The costs or benefits derived from increased or decreased travel due to the change.

(b) Facilities. The costs or benefits associated with the continued operation or leasing of a facility including the expected maintenance costs.

(c) Office Equipment. The costs or benefits of office equipment required for each alternative.

(d) Efficiency of Operations. The continuing costs or benefits associated with program operations and management effectiveness for each alternative. This includes both tangible and intangible costs/considerations. Items to be considered include:

(1) Time spent in-house on actual program operations rather than on travel.

(2) Overhead positions or time rescued or eliminated.

(3) Positions or time available for other priority work due to a more efficient organization.

(4) Positions or time available due to eliminating duplication.

(5) Redistribution of work which results in program savings.

(6) Other tangible or intangible program costs or benefits.

5. Steps in Processing Organizational Changes/Functional Realignments.

a. Organizational Changes which require Director/Departmental Approval.

1. Organizational change in Directorate at the Division level or above; Field and Area Office/Technical Service Center Relocation is identified and recommended.

2. Analysis of proposal is conducted. Program Evaluation Staff develops proposal for changes recommended by the Department and/or the Director. An Assistant Director may request assistance from the Program Evaluation Staff in developing their recommended proposals, as needed.

3. Proposal is developed and submitted to the appropriate Assistant Director/Director, as applicable. The Program Evaluation Staff coordinates the approval process.

4. The Program Evaluation Staff reviews the proposal against DOI, SMCRA, organizational principles and standards. The Program Evaluation Staff ensures that Union consultation/negotiation is completed, as appropriate, through the Division of Personnel.

5. Concurrent with the Program Evaluation Staff review, comments are obtained from the Divisions of Planning and Budget, Personnel, and the Equal Opportunity Staff.

6. The Program Evaluation Staff ensures that the proposal is justified and recommends, to the Director, approval or disapproval of the organizatonal concept.

7. Decision Document is prepared by the Program Evaluation Staff on the proposal for approval by the Director.

8. The Program Evaluation Staff prepares necessary documents for the Department. OSM's Director signs memorandum requesting approval, by the Department, and sends the package through the managing Assistant Secretary's Office. In the interim, an implementation plan is developed by the Program Evaluation Staff on major reorganizations.

9. The Program Evaluation Staff keeps abreast of Department actions and receives notification of approval/disapproval. The Program Evaluation Staff notifies initiating official and the Divisions of Planning and Budget and Personnel of the Department's actions.

10. The Program Evaluation Staff, in conjunction with Public Affairs Staff, prepares formal announcement of reorganizations to the public, OSM employees, other bureaus; and coordinates the implementation plan.

11. The Program Evaluation Staff prepares revisions to OSM's Organizational Manual.

12. Initiating office prepares rewrite of position descriptions to show new and/or changed duties and titles reflected in the approved functional statements and organizational charts.

13. Personnel establishes effective date of necessary personnel actions, where applicable. If budget actions are required, establish effective date in cooperation with Budget.

14. The Program Evaluation Staff implements all items and administrative tasks necessary to implement the change.

b. Organizational Changes which require Assistant Director Approval.

1. Organization change in Branch, Section, Field and Area Office or Technical Service Center is identified and recommended by the Program Office.

2. Analysis of the proposed organization change is developed by applicable program staff and submitted to the Assistant Director for approval.

3. Assistant Director submits proposal to the Program Evaluation Staff to coordinate approval process with the Divisions of Budget and Personnel and the Program Analysis Officer.

4. The Program Evaluation Staff makes recommendation to applicable Assistant Director and advises the Director of pending changes. If the Program Evaluation Staff disapproves the change, a decision document is prepared documenting the recommendation with justification. The Director has ultimate approval authority over disputes at branch level and below.

5. Once approved, a revision is made to the OSM Operations Manual with notices to all employees.

c. Realignment.

1. Realignments for all levels within OSM are developed and approved/disapproved by the responsible Assistant Director. Follow the above steps outlined in Section 5 (b) above. Functional statements must be amended.

6. Reporting Requirements. None.

7. Reference. Department of Interior/Departmental Manual -- 101 DM 1, 2, and 3, Part 116 Department Manual 1-6 OSM - Organization Statement.

8. Effect on Other Documents. None.

9. Effective Date. Upon Issuance.

10. Contact. Program Evaluation Staff, Office of the Director, (202) 343-4781.