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	U. S. DEPARTMENT OF THE INTERIOR OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT DIRECTIVES SYSTEM	Subject Number: OPM-13 Transmittal Number: 378 Date: 9/30/87

Subject: OPERATIONS EVALUATION STAFF

Approval: Jed D. Christensen | Title: DIRECTOR

1. Purpose. This directive establishes policies, assigns responsibilities, and prescribes procedures for implementing the Operations Evaluation Program within the Office of Surface Mining Reclamation and Enforcement (OSMRE). The purpose of the program is to examine how national Agency policy is being implemented by all units and to provide the Director, Deputy Directors, and Assistant Directors with constructive recommendations for improvements in policy implementation.

2. Definitions.

a. Unit Evaluation. An examination of specific unit operations to determine compliance with established policies/procedures, and to ensure national consistency of application and interpretation of the Surface Mining Control and Reclamation Act of 1977 (SMCRA), other applicable laws, and associated regulations.

b. Operations Evaluation Staff (OES). The unit reporting to the Deputy Director for Administration and Finance that is assigned the responsibility to organize and conduct evaluations.

c. Evaluation Review Board. The individuals appointed by the Deputy Directors and the Assistant Directors for Field Operations to review the draft final evaluation report for policy and programmatic implications and to report their conclusions to the appropriate Assistant Director for Field Operations.

d. Field Unit. The 13 Field Offices, associated area offices, and the Eastern and Western Field Operations offices.

e. Headquarters Unit. The Staff Offices, Divisions (including any associated unit located in the field), and the Assistant Directors' offices located at the OSMRE Headquarters level.

f. Evaluation Team. A group of individuals, selected by the OES Chief, and concurred in by the appropriate Assistant Director for Field Operations (AD-FO) and the Deputy Directors (DD), OSMRE, assigned to conduct an evaluation of a field unit or Headquarters unit.

g. Evaluation Report. The document prepared by the OES that contains the findings and recommendations resulting from the unit evaluation.

h. Evaluation Action Report (EAR). A report on the actions taken to resolve each recommendation contained in the evaluation report.

3. Policy/Procedures.

a. Policy. It is the policy of the OSMRE that an Operations Evaluation Staff be established and maintained to assist the Director, the Deputy Directors, the Assistant Directors and the Field Office Directors (FOD's) in evaluating the implementation of the OSMRE's operations at the field and headquarters level. To assure consistency, all evaluations shall be done under the following guidelines:

(1) All evaluations shall be conducted in an objective, timely and professional manner, in accordance with the standards established for such evaluation by this directive, including Appendix No. 1 (Operations Evaluation Handbook).

(2) All evaluations shall be fully documented, using the prescribed procedures, formats and forms in Appendix No. 1, and contain supporting data and analyses so that reviewing officials can understand the basis for the conclusions and recommendations.

(3) The evaluated unit and the appropriate AD's shall be given an opportunity to review and comment on the preliminary findings and recommendations of the evaluation team. Comments received shall be considered by the OES in preparing the final report.

(4) Follow-up procedures shall be initiated by the AD's-FO (or AD's-Headquarters for policy matters) to ensure that approved actions are implemented.

(5) The results, findings, conclusions, and recommendations of the evaluations shall be considered in the development of policy, procedures and directives and in the operational planning and budgeting process.

(6) OSMRE field units or other informed Agency personnel shall notify the OES of all reviews or audits scheduled by outside parties (e.g., OPM, DOI) in order for the OES to avoid scheduling conflicts and to be able to use the results of such reviews or audits.

b. Responsibilities.

(1) Director is responsible for the general direction of the Operations Evaluation Program. This includes approving the evaluation program policy directives, the annual evaluation schedule and the annual panel of potential evaluation team members. The Director will oversee and ensure effective cooperative efforts that crosscut Deputy Directorates, including implementation actions based upon recommendations from the evaluation teams.

(2) Deputy Director - Administration and Finance (DD-A&F) is responsible for directing the development of operations evaluation program policy and procedures, and providing policy direction to the OES. The DD-A&F, together with the Deputy Director-Operations and Technical Services approves the topics to be examined during a unit evaluation. The final evaluation design plan is approved by the DD-A&F. The DD-A&F also is responsible for reviewing evaluation findings and recommendations and ensuring that all final recommendations on matters under his purview are acted upon.

(3) Deputy Director - Operations and Technical Services (DD-OTS) is responsible together with the DD-A&F for approving the topics to be examined during a unit evaluation. The DD-OTS also facilitates assignment of team members, approves any final report that covers the entire AD-FO office and ensures that all final recommendations on matters under his purview are acted upon.

(4) Assistant Directors for Field Operations (AD-FO) are responsible for overseeing evaluations conducted in their units, reaching agreement on the annual evaluation schedule, approving the OES Chief's selection of applicable evaluation team members, approving the final reports covering Field Offices, and ensuring that all final recommendations on matters under their purview are acted upon.

(5) Headquarters Assistant Directors are responsible for overseeing evaluations conducted in their units, approving the OES Chief's selection of applicable evaluation team members, reviewing and commenting on all applicable findings and recommendations, approving the final reports covering Headquarter's units and ensuring that all final recommendations on matters under their purview are acted upon.

(6) Chief, Operations Evaluation Staff is responsible for developing and supervising the operation of the OES. This includes the development of directives and instructions; coordinating, monitoring and reviewing all evaluations performed by the staff; ensuring that logistical arrangements for the evaluation are completed in a thorough and timely manner; establishing and maintaining a filing system for all unit evaluation reports; and ensuring training on evaluation techniques for team members. The Chief also is responsible for submitting to the Deputy Directors and the Director a quarterly report on the status of the evaluations and associated recommendations. The Chief also will ensure that the Director and DD's are informed immediately of any finding with Agency-wide significance.

(7) Evaluation Review Board is responsible for reviewing each draft final report prepared by the OES and advising the applicable AD concerning the policy and programmatic soundness of the report's findings and recommendations. The Board will consist of four persons, with an annual appointment of one person each by the AD-EFO, AD-WFO, DD-A&F, and DD-OTS.

(c) Procedures.

(1) Standards. The unit evaluation process is to be accomplished according to the standards and procedures outlined below and detailed in Appendix No. 1 (Operations Evaluation Handbook). There are five phases to the process:

(a) Concept Phase. The end product of this phase is an evaluation concept proposal on the scope of the review. This will be submitted to the DD's and the appropriate AD for approval. There are two components of this phase.

1 Preliminary Research. The OES will review applicable reports, reviews, audits and analyses to gather information on the operation of the unit to be evaluated. This information will be summarized and used to develop the proposed scope of the review.

2 Topic Selection. The OES will recommend to the DD's and the appropriate AD a scope of topics to be evaluated based upon the preliminary research. After reviewing the recommendations, the DD's and the AD will approve a concept plan including the specific topics to be evaluated at a unit.

(b) Pre-Site Evaluation Phase. The end product of this phase is the evaluation design plan, including the evaluation interview schedule, and the initial questions to be asked during the interviews. There are three components of this phase.

1 Background Research. The OES will conduct research on and analysis of reports, memoranda, directives, and policy guidance documents maintained at Headquarters that relate to the topics to be evaluated at the unit. At the same time, the staff will develop further the design of the evaluation - e.g., the objectives, methodology and possible constraints and impediments.

2 Pre-Site Survey. The OES will create a pre-site survey for response by appropriate personnel at the unit.

3 Analysis and Evaluation Design. The OES will analyze the background material and the pre-site survey and develop a final evaluation design to be approved by the DD-A&F. The design will consist of the formulation of the questions for the on-site interviews, methods of observation and document reviews. If the evaluation includes a documentation review requiring sampling, a commonly accepted sampling methodology will be used.

(c) Fieldwork and Analysis Phase. The end result of this phase is an Evaluation Discussion Draft that is reviewed with the Unit Director and a representative of the appropriate AD.

(d) Final Report Phase. The end result of this phase is a final evaluation report, approved by the appropriate AD (or DD-OTS in the case of an evaluation of the Eastern or Western Field Operations). This phase has three components:

1 Draft Final Report. The OES will submit for review a draft final report within 3 weeks of the completion of the fieldwork to the appropriate AD (or DD if applicable), the Director of the evaluated

unit, and the Evaluation Review Board. Comments of the Evaluation Review Board, Unit Director and the appropriate AD (or DD if applicable) shall be submitted to the OES within 2 weeks of issuance of the draft final report.

2 Resolution of Differences. If there are unresolved issues based on the comments received, OES will submit these to the appropriate AD (or DD if applicable). The recommended resolution should be made to OES within 2 weeks. When differences are not readily resolved they will be taken to the DD's and, if necessary, the Director, for final resolution.

3 Final Report. The final report, incorporating any necessary revisions, will be submitted by the OES to the appropriate AD (or DD if applicable) for approval. Upon approval, distribution will be made by the OES based on a list approved by the Director.

(e) Follow-up Phase. The end result of this phase is resolution of the recommendations contained in the final evaluation report. The following policies apply:

1 Within 60 days of the approval of the final report, the appropriate AD will submit an Evaluation Action Report (EAR) on each recommendation to the OES. Follow-up activity on each recommendation requires:

a That the responsible unit (e.g., Field Office or Headquarters Division) complete the EAR specifying actions and timeframes (or the decision that action is not to be taken) in response to each recommendation.

b That the responsible unit forward the EAR to the appropriate AD for concurrence.

c That the AD review and forward the EAR to the OES upon approval.

d That quarterly progress reports on the EAR forms be forwarded to the OES by the appropriate AD on each unresolved recommendation.

e That the AD ensure that information concerning procedures that work well in a certain unit be disseminated to other units.

(2) Scheduling. An evaluation schedule will be prepared by the OES and approved by the Director. In the case of a change in the relative need of a unit to be evaluated, the AD's may request, and the DD-A&F may approve, a revised schedule. The effects of a schedule change on the OES and evaluation teams will be considered before changes are made.

4. Reporting Requirements. Quarterly status reports by the OES on all completed evaluations will be provided to the Director, Deputy Directors and Assistant Directors for Field Operations.

5. References. Appendix No. 1: Operations Evaluation Handbook.

6. Effect On Other Documents. None

7. Effective Date. Upon Issuance

8. Contact. Operations Evaluation Staff (202) 343-1919

APPENDIX I

OPERATIONS EVALUATION HANDBOOK

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SECTION 1. OVERVIEW OF THE HANDBOOK

Purpose

This Handbook has been developed for the Office of Surface Mining Reclamation and Enforcement (OSMRE) Operations Evaluation Staff (OES) and other OSMRE staff serving on evaluation teams. It is part of the OES policy directive and is intended to serve as a guide for staff and team members in preparing for and conducting unit evaluations.

The objectives of OSMRE's Operations Evaluation Staff are:

(a) To ensure that units maintain observance of OSMRE's national goals, policies and procedures as well as other pertinent government regulations and requirements.

(b) To identify and recognize programs and activities that are successful in achieving their intended results and objectives, and to disseminate such information to all units.

(c) To identify unique problems at individual units.

(d) To identify situations where units are implementing programs according to agency policy but the intended results are not being achieved. Such situations usually will be addressed in the evaluation reports with recommendations to the appropriate AD. However, in extraordinary situations the matter will be referred to the Director by the Chief, OES, through the Deputy Director for Administration and Finance.

(e) To provide a system for the recording and the followup of management's actions which result from evaluation recommendations.

(f) To develop and institute evaluation and monitoring techniques and methods; and

(g) To facilitate information transfer between units, Assistant Directors, Deputy Directors and the Director.

Format of the Handbook

Section 2 defines the concept of the OES. Section 3 provides information on the Concept Phase of the evaluation process which includes preliminary document review and topic selection. Section 4 describes team selection and composition. Section 5 describes the Pre-site Evaluation Phase which is

comprised of background research, the pre-site survey and analysis and evaluation design. Section 6 explains the on-site evaluation, including the interview process, document reviews, recordkeeping and team conferences. Section 7 defines the evaluation discussion draft report format and content. Section 8 outlines procedures for conducting the closeout with the Unit Director. Section 9 specifies review procedures for the final report. Section 10 describes procedures for follow-up actions.

Appendix A includes evaluation worksheets to be used in documenting reviews.

SECTION 2. CONCEPT OF THE OSMRE EVALUATION PROGRAM

The evaluation of units is one of the methods used in OSMRE to assure the consistency in program execution demanded by the Act and the Federal regulations. The operations evaluation process is intended to provide comprehensive evaluations of the Agency's headquarters and field units on a periodic basis. The OES staff will lead and coordinate such evaluations.

The program is designed to be a participative evaluation process whereby a unit will actively contribute to the overall content and design of the evaluation. Units will be called upon to contribute to monitoring and other post-evaluation activities. Agency personnel with expertise in various programs and activities will be selected to participate in each on-site evaluation.

Pre-evaluation research and design is expected to take 10-11 weeks prior to the on-site review. On-site evaluation is expected to average 2-3 weeks (depending on the complexity of the unit). The final report preparation and approval process is expected to average 8-10 weeks. Thus, each evaluation will take a total of 20-24 weeks from pre-evaluation research to final report issuance for each unit.

SECTION 3. CONCEPT PHASE

The OES will conduct a preliminary review of the most current State/Tribe Annual Evaluation Report(s) and any reports, audits and analyses generated by other sources relative to each unit to be evaluated. The staff will identify and summarize subjects from these reports that may target areas for further evaluation and review. The summary will provide the OES with background information regarding unit operations, strong program areas, potential problem areas, and potential topic areas.

Topic Selection

While standard topics will be addressed during each evaluation, additional topic areas requiring review will be identified through the OES staff's background research.

Potential topic areas will be identified by the OES staff after considering the following:

- Topics previously identified by OSMRE as national agency objectives.
- Issues identified by the Director and/or Deputy Directors.
- FOD and/or AD's request to have topics addressed.
- Previous unit evaluation results and results from any other applicable review, audit, or analysis.
- Unique mining and reclamation activities within a State.
- Concerns expressed by outside interests, including States/Tribes.
- Availability (or non-availability) of information.
- Information obtained during field reviews.

Recommended topics will be grouped into three categories based on the relative priority in covering them at a particular unit. The concept plan will be provided to the DD's and the appropriate AD for approval.

SECTION 4. TEAM SELECTION AND COMPOSITION

Annually, the OES staff will request that the Assistant Directors and Field Office Directors provide names of individuals who will be available to serve as members on evaluation teams. Names of potential team members will be provided as designated below:

Field Office Directors	3-5 each
Headquarters Divisions	5 each
Field Operations Offices	15 each

Each listing provided should include the name, grade, series, duty station and the name of the program area to which the individual is assigned. The final panel will be approved by the Director. Staff members from the office to be evaluated will not be asked to serve on the evaluation team.

The OES staff will select members for individual evaluations from the panel of potential members based upon the following criteria:

- Knowledge of the overall operation and goals of OSMRE.

- Knowledge of specific programs (e.g., inspection, assessments, grants).

- Demonstrated ability to analyze material and identify key elements of a problem and possible solutions.

- Demonstrated ability to write clearly, effectively and in a concise manner.

- Demonstrated ability to interview and synthesize information obtained from an interview.

- Demonstrated ability to work as part of a team.

- Demonstrated willingness and ability to work effectively under pressure.

The names of potential members for an evaluation will be submitted to the appropriate AD and the DD's for approval. In general no individual will be asked to serve on a team more than once every 6 months.

Potential team members will receive training in evaluation techniques and procedures prior to conducting evaluations. The training will focus on the purpose of evaluations, report writing skills, information collection and analysis and interview techniques.

The Team Leader usually will be a member of the OES staff and will serve as the evaluation specialist and the link between the team and the Unit Director. The Deputy Team Leader will participate in preparing various sections of the report and, together with the Team Leader, will be responsible for editing the draft material developed by the team members in order to prepare the Discussion Draft. Other members of the OES may serve on the team, acting as support for the Team Leader. The Team Leader is responsible for assuring that the following occurs:

- Initial data gathering and organization.

- Development of initial concept plan.

- Proposed scheduling and logistical arrangements.

- Development of design plan.

- Operational guidance and decisionmaking during the time the team is assembled.

- Sharing of information among team members.

- Report preparation, assembly, and revisions.

- Presentation of findings and recommendations.

Based on their previous experience, team members will be selected to serve as "subject matter specialists" for one or more of the topics selected. They will be responsible for conducting an evaluation as directed by the Team Leader and contributing their expertise to:

- Supplemental data gathering and interviews.

- Review and analysis of assigned program area(s).

- Preparation at the unit of document review worksheets, draft section summary worksheets and draft evaluation worksheets (see Section 7 of this Handbook for an explanation of the forms).

Consultants or advisors (e.g., ADP systems specialist) from outside of the OSMRE may be called upon to provide information and assistance to the team. The use of these individuals must be approved by the Deputy Director, Administration and Finance (DD-A&F) prior to their assisting the OES staff or evaluation team.

SECTION 5. PRE-SITE EVALUATION PHASE

The activities associated with the Pre-site Evaluation Phase will be carried out by the OES staff at Headquarters and by the unit to be evaluated. This phase of the evaluation process consists of background research into the selected evaluation topics, a pre-site survey administered to the unit to be evaluated, the analysis of all information collected and the design of the final evaluation format.

Background Research

The information gathered at this time will be used to focus the evaluation on key issues uniquely related to the specific areas being evaluated. Background research includes the review and assembly of documents located at Headquarters which relate to the unit being evaluated. These documents include, but are not limited to, annual reports (e.g., OSMRE, State Report to Governor), other evaluation reports prepared by Field Offices (e.g., oversight reports of the States), directives, policy memoranda, Headquarters computer generated reports, newspaper articles, and the OSMRE correspondence files. The OES will review and summarize issues raised in these documents and identify the source.

Pre-site Survey

A pre-site survey will be developed in the form of a questionnaire by the OES staff and completed by supervisors at the unit being evaluated.

Although portions of the pre-site survey will be standardized, portions will be tailored to address specific issues at the unit.

The analytical objectives of the survey are:

- To obtain information on unit objectives.
- To obtain information on how the unit implements its programs.
- To obtain information from the respondent about how program implementation can be improved.

The pre-site survey will be ananlyzed by OES prior to conducting an on-site evaluation. After the results have been analyzed, the staff will distribute the results to all evaluation team members.

Development of Interview Questions

In developing interview questions, evaluation team members will review summaries generated from the background research and the analyzed results of the pre-site survey. The potential interview questions will focus on clarifying information obtained from these sources. The OES and individuals selected for an evaluation team will prepare initial questions prior to arrival at the unit. During the team orientation (refer to Section 6) a consolidated list of initial questions will be formulated. An initial interview schedule will be developed by the Team Leader to ensure that sufficient, but not overly burdensome, time is allocated to interviewees, that the appropriate individuals are interviewed and that broad rather than narrow coverage of unit personnel is achieved.

Interviews with persons outside of OSMRE (e.g., State agency personnel, industry and environmental representatives) will be conducted at the direction of, and on topics chosen by, the Team Leader. Usually, the Team Leader or Deputy Team Leader will conduct any such interviews.

Design Plan

The culmination of the research will be a design plan for the evaluation including a tentative schedule for each evaluation task (e.g., pre-site survey, interviews) and a determination of which individuals to interview initially at the unit and at

external sources, e.g., State agency, environmental and industry groups. The design plan will be approved by the DD-A&F and used internally by the team and the OES to conduct the evaluation.

SECTION 6. FIELDWORK AND ANALYSIS PHASE

Fieldwork Procedures

The fieldwork and analysis phase of the evaluation is comprised of all evaluation activities which will occur onsite. These activities include evaluation team orientation, interviews, document reviews, team conferences, and analysis of trends and patterns so that concise findings and recommendations can be written. The following procedures will be followed by the evaluation team:

- Data collection activities will be conducted with minimum disruption to the program or activity under study and with minimum imposition on the organizations or persons from whom data are gathered.

- Data will be handled and stored so that release to unauthorized persons is prevented. However, it must be recognized that much of the material developed as part of the evaluation is subject to the Freedom of Information Act.

- Documentation will be maintained regarding the source, method of collection, circumstances of collection, and processes of data preparation.

- The analytical procedures will be matched to the purposes of the evaluation, design, and the data collected.

- Documentation will be adequate to produce supportable analyses.

Schedule

Prior to arrival at the unit, a schedule of interviews and report preparation milestones will be developed by the Team Leader. Team members will have received information on the results of the pre-site survey and background research. The schedule will reflect the scope of the evaluation, provide equitable time for interviews, provide a means of monitoring progress towards completing the report, and provide for a minimum of disruption of the unit's regular activities.

Evaluation Team Orientation

The Team Leader will conduct an orientation for the evaluation team at the unit being evaluated to review the procedures for conducting the evaluation and address any special concerns. The orientation will cover the following subjects:

- the rationale for selecting evaluation topics;
- the sample size of documents selected and the basis for the selection;
- procedures for conducting the evaluation;
- finalization of initial questions to be asked of interviewees;
- guidance for development of issues for incorporation in the written findings;
- evaluation worksheets;
- procedures for conducting closeout.

The evaluation team will meet with the Unit Director and other staff deemed appropriate by the Unit Director. This will provide an opportunity for the evaluation team to meet staff of the unit and to describe the purpose and procedure of the evaluation.

Interviews

The interviewer will introduce himself/herself and any other persons involved in the interview to the interviewee(s) and answer any questions on the evaluation process. The interviewer will explain why the group or individual is being interviewed and will encourage the interviewee(s) to be as candid as possible. The interviewee(s) should also be advised that team members will be taking notes during the interview and that the information gathered will be used by the team. Interviews will remain confidential if requested. Additionally, interviewee(s) should be informed that the interview will generally be guided by a standard outline to assist in giving direction to the evaluation.

In conducting the interview, the evaluation team should adhere to the following guidelines:

- The primary purpose of the interview is to gather information.

- If the interviewee asks questions not related directly to the evaluation process (e.g., policy on a technical matter that both are familiar with), the interviewer may discuss the matter but must make it clear that any official answer must come through appropriate supervisory channels.

- Phrase initial questions and any followup to promote discussion, rather than "yes" or "no" answers.

- Avoid asking multiple questions. Break down a complex question into several simple questions.

- Encourage the interviewee to offer opinions and suggest solutions to specific problems. Carefully separate opinion from substantiated information and identify the location or obtain copies of substantiated information.

- Be a good listener. Absorb the interviewee's responses and rephrase or quote, if necessary, for clarifying or expanding the discussion.

- Lead the interview, but do not "over lead" toward a predetermined answer.

- If responses appear incorrect, find out why the interviewee believes the way he/she does.

Document/System Reviews

As a part of the Fieldwork and Analysis Phase of the evaluation, team members will conduct document reviews of files and record-keeping systems, and will record their findings on the evaluation worksheets (Appendix A). Documentation reviews will also include an analysis of the unit's special studies, correspondence files, computerized reports, case files, tracking systems, manuals, logs, procedural guidelines, and directives. The purpose of document reviews is to determine:

- whether the files are administratively complete;

- whether documents are technically accurate and in compliance with Agency policy;

- whether practices are being implemented which may be inconsistent with national policy;

- whether sufficient data are being collected and analyzed to evaluate the State program and/or to enforce the Federal program;

- whether the unit is routinely meeting with the State Regulatory Authority to discuss existent or potential problem areas; and

- to verify information obtained from the pre-site survey and interviews.

Team Conferences

During the evaluation, time will be reserved each day for a team conference. The conference will provide an opportunity for team members to discuss with other team members possible findings, raise questions, and make other observations. Such discussion items may subsequently develop into findings if sufficient data are collected to substantiate findings; or may develop into summary or verbal discussion with the FOD or AD.

SECTION 7. EVALUATION DISCUSSION DRAFT

Each evaluation report generated by the OES team will be assigned an identification number. The report number will consist of 7 characters and will be structured to include the unit symbol and the month and year the on-site evaluation was initiated. Added to this will be a further identification of each recommendation and the category classification code. For example, CAS038604D.2 means: CAS = field unit symbol for Casper; 0386 = March 1986; 04 = 4th recommendation contained in the report; D = area for improvement (the meaning of this final alpha character is discussed in this section under Evaluation Worksheet); and 2 = item #2 of the recommendation.

Symbols for each field unit are:

CASPER	= CAS
ALBUQUERQUE	= ALQ
TULSA	= TUL
KANSAS CITY	= KAN
SPRINGFIELD	= SPR
INDIANAPOLIS	= IND
COLUMBUS	= COL
LEXINGTON	= LEX
KNOXVILLE	= KNO
BIRMINGHAM	= BIR
CHARLESTON	= CHA
HARRISBURG	= HAR
BIG STONE GAP	= BSG
EASTERN FIELD OPERATIONS	= EFO
WESTERN FIELD OPERATIONS	= WFO

Symbols for each headquarters unit are:

REGULATORY DEVELOPMENT AND ISSUES MANAGEMENT	= RDI
EQUAL OPPORTUNITY STAFF	= EOS
EXTERNAL AFFAIRS STAFF	= EAS
CONGRESSIONAL LIAISON STAFF	= CLS

PUBLIC AFFAIRS STAFF	= PAS
INFORMATION SYSTEMS MANAGEMENT	= ISM
DIVISION OF PROGRAM INFORMATION AND ANALYSIS	= PIA
DIVISION OF SYSTEMS DEVELOPMENT AND IMPLEMENTATION	= SDI
DIVISION OF RESOURCE MANAGEMENT	= DRM
FINANCE AND ACCOUNTING	= F&A
DIVISION OF DEBT MANAGEMENT	= DDM
DIVISION OF COMPLIANCE MANAGEMENT	= COM
DIVISION OF FINANCIAL MANAGEMENT	= DFM
BUDGET AND ADMINISTRATION	= B&A
DIVISION OF BUDGET PLANNING AND MANAGEMENT ANALYSIS	= BPA
DIVISION OF MANAGEMENT SERVICES	= DMS
DIVISION OF PERSONNEL	= PER
PROGRAM POLICY	= PPO
DIVISION OF REGULATORY PROGRAMS	= REG
DIVISION OF ABANDONED MINE LAND RECLAMATION	= AML
DIVISION OF TECHNICAL SERVICES	= TEC

Information collected from interviews, files and systems will be analyzed and summarized on the standard evaluation worksheets found in Appendix A. These are: 1) the Document Review Worksheet, 2) Discussion Draft Title Page, 3) Evaluation Report Title Page, 4) Evaluation Summary, 5) Section Summary Worksheet, 6) Evaluation Worksheet, and 7) Evaluation Action Report. The Document Review Worksheet will be used for background information and the Evaluation Action Report for followup; the remaining worksheets will comprise the actual report.

Document Review Worksheet

Document Review Worksheets will be completed by the evaluation team members for each interview, case file, or system reviewed. These worksheets will not accompany the evaluation report, but will be used as background material to support findings and recommendations. A discussion of the interview or review will be summarized on the worksheet and will include:

- evaluation topic;
- information source, e.g., file, computer system;
- detailed summary of information gathered; and
- identification of the accomplishment or problem.

Discussion Draft Title Page

This worksheet will be the cover sheet for the discussion draft of the report. Each team member will be asked to sign and thereby acknowledge agreement with the draft findings and recommendations.

Evaluation Report Title Page

This worksheet will be the cover sheet for the final report. The final report will be signed by the evaluation Team Leader, the Chief, OES and approved by the appropriate AD (DD-OTS in the case of an evaluation of the entire Eastern/Western Field Operations office).

Evaluation Summary

This worksheet will include any appropriate summary statistics (e.g., number of findings and recommendations by category) and indicate the overall status of operations in the evaluated unit.

Section Summary Worksheet

Based upon the results of the fieldwork, the Section Summary Worksheet will be completed to summarize information gathered on the various topic areas. This summary will briefly outline.

- purpose of the section (e.g., personnel actions, grants, inspection);
- overall status of operations within the section;
- items reviewed in the section; and
- sample sizes.

Evaluation Worksheet

The Evaluation Worksheet (3 formats depending on length of a finding and recommendation(s)) will contain summarized findings and recommendations grouped by topic and categorized as follows:

Category A -- special achievement
Category B -- possible law/regulation conflict
Category C -- policy directive/guideline conflict
Category D -- area for improvement

Minor problems and single instance problems will be avoided unless they have a significant impact on a topic area. Evaluation team members will differentiate between opinion and fact and will include detailed statements on the document review worksheet to support findings. Findings and recommendations contained on the evaluation worksheet will be developed in accordance with the guidelines below:

- Findings

  - identify accomplishments of the unit;

  - identify existent and potential problems;

  - identify probable cause of the deficiency;

  - identify regulations, policies or procedures that were not implemented; and

  - identify lack of policy or procedures that appear to be causing a problem.

- Recommendations

  - relate to a finding or group of findings;

  - are specific and expressed in clear and direct language;

  - are reasonable, implementable, and directed at basic causes of the identified problem;

  - discuss the intent of the recommendation (to improve, correct, reduce, etc.); and

  - identify the suggested action official.

Evaluation Action Report

This worksheet will be used to report on actions taken to resolve each recommendation. It will include a summary of the action and, as necessary, include as attachments any appropriate documents (e.g., action plans, draft/final policy directives). The report will be prepared by the individual assigned the follow-up action. If appropriate, it will be signed by a person designated by the AD to monitor such actions. It will then be approved by the AD, or other designated official, and copies sent to the OES and the Unit Director. This procedure will continue on a quarterly basis for all recommendations that remain unresolved (i.e., final resolution action not implemented). (Also refer to section 10, Follow up). Quarterly status reports will be provided to the Director and Deputy Directors by the OES.

SECTION 8. CLOSEOUT

A closeout session will be held with the Unit Director at the end of the evaluation. The AD (or DD-OTS in the case of a review at the AD-FO level) or designee, will be invited to attend the closeout session. The Unit Director will have an opportunity to present comments and additional material and to <u>request</u> exclusion of certain findings and/or recommendations believed to be

either too sensitive or too trivial. Such items that the Team Leader decides to exclude from the written report usually will be communicated to the AD or to the DD by the evaluation Team Leader or Deputy Team Leader. After the closeout session, the Team Leader will determine if there are any changes needed in the evaluation discussion draft, including clarification of certain findings and recommendations. Written comments submitted by the applicable AD/Unit Director will be printed as part of the final report.

The Team Leader will schedule and conduct the closeout session with support from individual team members on their activity or program as necessary. Minor findings, recommendations and observations will be discussed, even though they may not be included in the final evaluation report.

The evaluation discussion draft will be reviewed during the closeout session but the final report will be distributed only after approval by the appropriate AD or DD.

The closeout session will conclude with the Unit Director and staff providing feedback regarding the evaluation process.

SECTION 9. FINAL REPORT PHASE

A maximum of 3 weeks after the site visit is allocated for the OES to complete the draft final evaluation report and transmit it to the AD (or the DD), the Evaluation Review Board, and the Director of the evaluated unit. Procedures for preparing the final report are:

- Findings will be reported in a manner that distinguishes among fully documented findings, opinions, and judgements.
- Findings will be reported clearly, completely and fairly.
- Findings will be organized by subject matter and stated in clear language.
- Recommendations will be clearly related to the findings and be reasonable, implementable, and directed to correcting basic causes of identified problems.
- Findings and recommendations will be presented in a framework that indicates their relative importance.
- Assumptions will be explicitly acknowledged.

The steps included in the Final Report Phase are:

1. <u>Draft Final Report</u>. The OES will submit for review a draft final report within 3 weeks of the completion of the fieldwork to the appropriate AD (or DD-OTS in the

case of a review of the entire Eastern/Western Field Operations Office), the Director of the evaluated unit, the Evaluation Review Board and Headquarters AD's when their areas of responsibility are effected. Comments will be submitted to the OES within 2 weeks of issuance of the draft final report.

2. Resolution of Differences. If there are unresolved issues based on the comments received, OES will submit these to the appropriate AD (or DD if applicable). The recommended resolution should be made within 2 weeks. When differences are not readily resolved, they will be taken to the DD's and, if necessary, the Director, for final resolution.

3. Final Report. The final report, incorporating any necessary revisions, will be submitted by the OES to the appropriate AD (or DD-OTS in the case of a review of the AD-FO) for approval. Upon approval, distribution will be made by the OES based on a list approved by the Director.

SECTION 10. FOLLOW-UP PHASE

The OES will submit a quarterly report to the DD-A&F to briefly summarize the status of the program. It will include any changes to the evaluation schedule, review of success or failure of individual evaluations, and a report on findings with possible agency-wide significance. Also, persons contributing to the evaluation will be kept informed on issued documents and recommendation resolution as appropriate.

The Evaluation Action Report(s) (EAR) included in Appendix A will be implemented in the following manner:

- The appropriate AD will assign for each recommendation a unit or person to be responsible for proposing a resolution of the recommendation;

- The assigned unit/person will complete an EAR and document the action already taken on each recommendation, the action to be taken (including timeframes) or the reason for no action;

- The AD will review the EAR, determine the appropriateness of the action taken or proposed, and forward the form to the OES and the Unit Director;

- The first EAR covering each recommendation is due to the OES no later than 60 days after the final report is approved by the AD-FO (or appropriate DD if applicable).

- The OES will prepare a report for the Director and DD's.

- Subsequent EAR's on each resolved recommendation are due to the OES no later than 15 days after the end of each fiscal year quarter (i.e., December 31, March 31, June 30, and September 30).

- The OES will prepare a quarterly report on the status of each resolved recommendation for the Director and the DD's.

- While the OES tracks recommendation resolution for the Directorate, it is not responsible for determining either the appropriateness of the responses or assuring that responses are submitted in a timely manner. These are responsibilities of the AD's and DD's.

APPENDIX A: EVALUATION FORMS

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

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Report ID	
Recommendation ID	

Document Review Worksheet

Worksheet Subject

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

Discussion Draft

Field Unit:

Report ID:

Dates Conducted: From To

Team Members

Name	Title	Signature

Approved by Deputy Team Leader	Signature	Date
Approved by Team Leader	Signature	Date

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF SURFACE MINING RECLAMATION
AND ENFORCEMENT

Date:

Evaluation Report Title Page

Field Unit:

Report ID:

Dates Conducted: From To

Approved by Team Leader (Representing the entire Team) Signature Date

Approved by Chief, Operations Evaluation Staff Signature Date

Approved by (name & title) Signature Date

UNITED STATES
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Evaluation Summary

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Section	
Number	Title

Section Summary

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

Report ID:
Recommendation ID:

Findings/Recommendations

Worksheet Subject

Findings

Recommendations

Team Leader Signature Date

Implementation

Assigned to (office)

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DEPARTMENT OF THE INTERIOR
OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

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Findings

Worksheet Subject

Findings

UNITED STATES
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OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

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Recommendations

Worksheet Subject

Recommendations

Team Leader Signature Date

Implementation

Assigned to (office)

UNITED STATES
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OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

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Evaluation Action Report

Subject

Response and/or Action Taken*

Action Official (title) Signature Date

Response Review	Followup Review
Reviewer's Recommendation ☐ Accept Response ☐ Further Guidance Enclosed	Recommendation ☐ Resolution Action Completed ☐ Additional Followup Required (specify on attached sheet)
Reviewer (Signature) Date	Follow Up Reviewer (Signature) Date

*Summary of response/action. Attach as necessary appropriate documents (e.g., Field Office Director's response, actions plans, issued policy directive).