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BUREAU OF LAND MANAGEMENT
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June 11, 1997

Memorandum

To: Deputy Director, Assistant Directors,
Center Directors, and Associate State Directors

From: Deputy State Director, Support Services, NM

Subject: Directives Re-Engineering - Initial Proposal

Attached is a synopsis of comments received by the Directives Team in response to Washington Office Information Bulletin No. 97-120, "Directives Re-Engineering Questionnaire." Based on these comments, we have developed a variety of proposed options and guidelines for your consideration and comment. We purposely have not made any recommendations to allow you and your staff to have a greater influence on the final outcome. Our goal is to make the re-engineered system your system.

Some proposed options presented are:

- * Maintain the current system as is.
- * Replace Information Bulletins with general correspondence.
- * Merge Instruction Memoranda and Manuals. -
- * Use WordPerfect `macros' to ensure consistency of directives.
- * Shift responsibility for development, distribution, and maintenance of directives to the office with delegated authority for issuing policy.
- * Include additional mandatory sections such as `Budget/FTE Implications' and `Performance Measures' in directives.
- * Maintain library of directives on the Intranet and Internet.

We would appreciate a consolidated response from your organization that reflects your perspective on the proposed options, guidelines, and other items in the attachment. Please mail me your response via GroupWise by July 15, 1997. Please also convey our interest in talking individually to your employees, if they desire. They are invited to call any team member to clarify, comment, disagree, provide additional ideas, etc. All comments are important and welcome.

Once we receive your comments, we will revise the document and again ask for your review. We hope at that point that we will be approaching an agency consensus, thus ensuring a successful transition to a new and improved Directives System.

Attachment 1 (17 pp)

Thank. for your help.

/s/ Frank

Frank Splendoria

2 Attachment.:

- 1 - Synopsis of Comments (3 pp)
- 2 - Directives Re-Engineering
Initial Proposal (12 pp)

Synopsis of Comments

Responses to the following questions were received from Alaska, Arizona, California, Eastern States, Idaho, Montana, Nevada, New Mexico, Oregon, NARSC, NIFC, and Washington Office (800), per WO 18 No. 97-120:

What should be the purpose/objective of a RIM Directives Systems?

- * To convey clear, flexible, concise, timely, permanent, electronic guidance on policy, instructions, information, or direction to areas that require Bureauwide, Statewide, or Districtwide consistency.
- * To disseminate information on issues that require interpretation of policy or regulations.
- * Directives should be a tool to increase employees knowledge, to continuously improve their performance, and accomplish strategic objectives.
- * For effective implementation of BLM policies and mandates.

When should directives be developed and by whom?

- * When we need to provide direction, policy, guidance, or information to field offices.
- * When the information is of the type that needs to be retained for a specific period of time.
- * To relay instructions for accomplishing mission or accumulating data; as conditions warrant.
- * Directives should be developed by line managers in State, District, and Resource Area Offices. Input or participation should come from customers and stakeholders.

How should agency directives be developed?

- * By individual or team experts, then circulated to all who may be affected by the directives for comment.
- * Post disposition of comments to all commenters before issuance; post new policy as Manual revision on a web site.
- * Interpret existing policy.
- * Standardize procedures.
- * Use external/internal collaboration.
- * Don't develop on pending legislation, but within 6 months of passage.
- * Speed up process at Headquarters.
- * Make easy to modify.
- * Use one standard software and one standard format; eliminate duplicative, conflicting, or confusing text.

Should the current system of Manuals, Handbooks, Instruction Memoranda (IM's), Information Bulletins (IB's) be retained?

- * Most commenters felt the existing system serves them well.
- * Reconsider what is transmitted as temporary directives.
- * Issue IM's only for new policy, procedure, etc.
- * Directives should only include Manuals.
- * Eliminate temporary directives.
- * Consolidate IM's and IB's.

Suggestions on how to improve the directives development process:

- * Improve timeliness in the development and update of directives, especially Manuals and Handbooks.
- * Allow an IM to be issued without an expiration date and remain in effect until superseded or canceled.
- * Shorten the review and issuance time frame.
- * Directives should be retrievable by metadata search.

How would customers like to receive directives?

- * Overall, customers wanted to receive directives by Groupwise and then stored in the Intranet for easier employee access.
- * Send Manuals by hard-copy (less wear/tear on printers).

How could the distribution process be improved?

- * Post all directives on Intranet (save copying, paper, etc.).
- * Have all offices use the same software, for accessibility.
- * Require all offices to establish "official" E-mail boxes.
- * Maintain a historical data base of directives on Intranet.
- * Create a search engine option.
- * Publish monthly listings of all directives.
- * Ensure electronic distribution of changes.
- * Require maintenance of Directives Digest Bulletin.

What should a directive contain?

- * Procedures, rules, regulations, anything that would enhance the operation of the organization.

- * Rationale.
- * How and when to implement Bureau policies.

Other Suggestions/concerns:

- * Allow changes to IB's, i.e., "Change 1" to the original.
- * Time standard should be placed on review.
- * All authors must be trained in plain English and use the "grammatics~function of their computers prior to issuance.
- * Handbooks should be used as desk aids and training supplements rather than as part of the Directives System.
- * Mandated reduction of regulations has led to a loss of valuable policy with no replacement.
- * Substandard documents with "typos" that are poorly written cause delays in issuing directives.
- * Field is operating on temporary, often outdated, directives.
- * IM's/IB's are issued with the wrong numbers, wrong attachment, or missing the attachment altogether.

Directives Re-Engineering
Initial Proposal
June 1997

Team Objective

Re-engineer the existing directive. process and recommend changes that will meet customer needs and fulfill agency legal requirements.

Team Members

Marcella Davis	WO-530	202-452-5040
Marsha Harley	WO-850	202-452-5156
Ron Smith	WO-210	202-452-0383
Wendy Spencer	WO-520D	303-236-6642
Frank Splendoria	NM-950	505-438-7528
Sandy Thomas	AK-955	907-271-6586
Eileen Vigil	NM-953	505-438-7636

* We would still like a Field Manager on the Team. As yet, we have received no nominees from a State Director.

Team Approach

Use a collaborative approach with team members from all organizational levels who develop and use policy documents (i.e., directives). The Directives Team and the Bureau will challenge all aspects of our current system, and will creatively identify improved policy and procedures. Executive Leadership Team members will be given several opportunities to provide input so the final product will best meet their needs. We will coordinate with the Department and the National Archives to ensure compliance with their policy. The Forest Service has agreed to participate as part of the Directives Team. where practical, we hope to explore opportunities for building a similar Directives System with the Forest Service. We have also reviewed directives policy and procedures from:

- Bureau of Reclamation
- Department of Energy
- Department of Defense
- Department of the Interior
- Federal Aviation Administration
- Fish and Wildlife Service
- Minerals Management Service
- Office of Patents and Trademarks

* We have not identified a way to obtain public comment and would appreciate your ideas on this.

Background

In a large geographically dispersed organization like BLM, documented policy with specific or general guidance is necessary to ensure the accomplishment of the mission. In the BLM, policy is issued via the Directives System. This System was developed in the 1950's and is insufficient to meet current needs. It is paper-based, it is not timely; and it is not being used as intended. The system is incomplete and legally insufficient for agency decisions.

Purpose of Directive. System

Directives educate and instruct employees and thus provide the legal basis for BLM activities. The Directives System should differentiate between true policy, and requests for information and general needs. It should provide a method for developing, changing, updating, and deleting policy resulting from changing regulations, legislation, and case law. The system should serve both new and experienced employees, and the public. Directives are also a policy record keeping system.

Objectives for Re-Engineered Directives System

- * Keep directives simple and timely.
- * Make directives accessible and easy to create, update, and maintain by using standard software.
- * Develop directives by involving all affected parties.
- * Ensure directives are professionally written.
- * Take advantage of technology and a paper-less-office concept.
- * Give sole responsibility for production and maintenance of directives to program offices and line managers.
- * Produce minimal directives necessary, to encourage an innovative work force.
- * Meet agency legal requirements and conform to National Archives and Department of the Interior policy.
- * Ensure an electronically "secure" system.
- * Develop training and reference materials, e.g., directives desk reference guide, to facilitate implementation and use.
- * Establish periodic evaluations to measure progress and for continuous improvement.

The following pages describe various alternatives or options for the Directives System. The Team would like your thoughts and preferences on each.

A. Directives System Alternatives

Proposed Guidelines for All Alternatives:

- * Bureau managers must ensure that directives add value to the way BLM conducts business.
- * Bureau directives should be developed in context with today's electronic environment, thereby facilitating broader opportunities for involvement.
- * Directives must be written in a professional manner using clear, simple English.
- * In addition to providing new policy, directives should be developed to

eliminate duplicative, conflicting, or confusing instructions, and, of course, when mandated by legislation or necessitated because of new case law.

- o A team approach should be used, including internal and external customers and stakeholders.

Alternative 1: No Change to Existing System

Leave Directives System as is. Retain entire system, including IM's, IB's, Manuals, and Handbooks. Continue to transmit IM's and IB's via Groupwise where possible; provide paper copies of Manual Releases. Post ALL directives on the BLM Directives Intranet site. "Changes" would be allowed to IB's (such as, Change 1 or Change 2).

Advantages:

- * No change; less work; system is workable.
- * Employees are familiar with the current system.
- * Directives are easily retrievable.
- * Current system is consistent with, and was modeled after, the current Directives System used by the Forest Service.

Disadvantages:

- * The current system is cumbersome.
- * The current system was developed for the paper world not electronic.
- * The current system causes confusion, especially when differentiating between IM's and IB's.
- * The system is often handicapped by a lack of teamwork (internal coordination).
- * The current system lacks the necessary management support and recognition to make it an effective tool for conveyance and repository of BLM policy.
- * Current system does not encourage a thorough analysis and identification of the impacts (resources, budget, etc.) of the policy being proposed.
- * There is no standard for professionalism; this may reflect poorly on BLM when publicly available directives are made available through the electronic FOIA Homepage.

Alternative 2: Partial Change

Retain but remodel IM's and Manual Releases. IM's would be used for conveying short-term policy where the sunset date is either definite or unknown. IM's would include anything related to development, review, approval, and implementation of policy, such as requesting comments on draft policy. A flexible/variable expiration date for IM's, from 1 to 3 years with NO renewal option, would be allowed. After this time, the IM would be incorporated into the Manual or no longer used. (See Content section of this document for suggested IM and Manual Release changes.)

Eliminate IB's and Phase-out Handbooks. Use bulletin boards, Groupwise, and

newsgroups to share notices of meeting., general correspondence, guides, desk aids, technical notes, and other methods for communicating information.

In summary, ALL policy would be placed in either IM's or Manuals; no policy would be placed in guides, bulletin boards, desk aids, etc.

Advantages:

- * Eliminates current confusion between IM's and IB's, Manuals, and Handbooks.
- * Expiration/sunset dates are known.
- * Paperwork/distribution requirements are reduced.
- * May encourage the use of the Directives System and the inclusion of IM's into the Manual.
- * Constitutes a modest change while retaining the basic foundation of the current system.
- * A significant reduction in the number and amount of directives may be achieved over time.

Disadvantages:

- * Changes may result in confusion on how to disseminate information previously provided by IB's or Handbooks.
- * Information formerly conveyed by IB's or Handbooks could be lost or destroyed if not printed and filed appropriately.

Alternative 3: Radical change.

Eliminate IM's and IB's. Retain Handbooks but not as part of Directives System. Use alternate methods for disseminating information, best practices, notices, etc. (See above for other suggested distribution methods.) Incorporate ALL policy. both new and revisions. immediately into the Manual. Disseminate all Manual changes electronically.

Advantages:

- * All policy would be found in a single location.
- * Encourages program offices to keep policy current.
- * Eliminates current confusion between IM's and IB's, Manuals, and Handbooks.
- * Paperwork/distribution requirements are reduced. Photocopying, mailing, and filing can be eliminated or minimized.
- * A significant reduction in the number and amount of directives may be achieved over time.

Disadvantages

- * Unless extremely easy to use and timely done by responsible manager, could encourage circumvention of the Directives System (policy may be sent informally via Groupwise, News groups, etc.).
- * Incorporating policy into the Manual may be time consuming, at least

initially until all Manuals are in a standard, automated format.

Using only one document type for policy could make keeping up with constant changes difficult for employees.

B. Development of Directives

Alternative 1: No Change

Program Office develops and another office (e.g., Directives Office in Washington) finalizes and distributes.

Alternative 2: change

Per delegated authority, the responsible program office or line manager (i.e., Assistant Directors, State Directors, Field Offices, Center Directors) would be responsible and accountable for development, distribution, and maintenance of proposed and final policy.

C. Signatory Authority for Directives

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Alternative 1: No Change

Leave as is with Assistant Director, Deputy State Director, Field Manager, etc., signing.

Alternative 2: Change

Delegate signature authority to senior program specialist.

D. Content of Directives

Alternative 1: No Change

Leave the content and structure variable as it currently is.

Alternative 2: Change

The content and format of Manuals and IM's would be uniform. Users would be able to easily identify policy and facilitate IM incorporation into Manuals. Mandatory fields would be identified to provide consistency and assist the internal/external customer in recognizing certain areas of the body of the directive. (See following pages for examples.)

I. IM Identification

Alternative 1: No Change

Alternative 2: Add Subject Code

Include subject code numbering system (i.e., 1100, 1200, 2000, 2100, etc.) in

IM number. For example, an IM/IB issued by the Oil and Gas Leasing Program related to Oil and Gas would be: IM WO-97-3100-01. The number indicates that it is an Instruction Memorandum issued by the Washington Office, in Fiscal Year 1997, subject area being oil and gas leasing, and the first one issued under that subject code. This would alleviate having to look through all numbers for a known interest area.

F. Overlapping Guidance Between Field, State, Washington Office. etc.

Alternative 1: No change

Leave as is in a tiered arrangement where the Manual only states what is applicable to BLM and asks the user to refer to a higher source: i.e., Department Manual, CFR, etc. Information is not repeated that has been previously mentioned. Directive would only include what is changing or different from existing referenced guidance.

Advantages:

- * Does not repeat what is already included in other Manuals.
- * Size of Manuals is minimized.

Disadvantages:

- * May increase confusion for user as it requires them to go to various locations to find related information and piece it together.

Alternative 2: "One-Stop" Concept

Incorporate relevant policy from all sources in one document. For example, if Manual policy was based on information from another organizational level, relevant portions of that affected Manual would be included.

Advantages:

- * Would provide a "one-stop shop" concept where internal/external customers could access relevant information in one place.
- * Easier and more efficient Reference Tool, if automated.
- * Paperwork Reduction not an issue if automated.

Disadvantages:

- * Not consistent with Paperwork Reduction Act if not automated.
- * Could be information-overload.

G. Standardized Fonts

Alternative 1: Establish standard font style and size

- * If this option is implemented, which font/size would your office prefer?

Advantages:

- * Provide consistency throughout the Bureau.

- * Provide a professional appearance.

Disadvantages:

- * May not meet originator's needs in some cases.

- * Does not allow flexibility.

Alternative 2: Fonts Optional

Advantages:

- * Promotes flexibility and creativity.

- * Would meet originator's needs.

Disadvantages:

- * No standard look for agency policy.

- * May appear Unprofessional to public.

- * May have conversion problems to Internet/Intranet web pages.

- * If taken to the extreme, may not be readable and difficult for user to follow.

Alternative 3: Several Standard Fonts

Advantages:

- * Allows for some flexibility.

- * Achieve some uniformity Bureauwide.

Disadvantages:

- * Could appear disorganized and unprofessional.

- * Formats could be unintentionally converted to different font style and size.

H. Internet/Intranet

Proposed Guidelines:

- * All directives would be prepared so that they are "Internet-ready." (The Team has been informed that we need a standard Unix Internet Tool with built-in conversion.)

- * Build "Links" from the Directive to authorities (laws, regulations, orders, etc.) would be used to help achieve the "one-stop shop" concept for the user and/or members of the public. For example, if an IM is issued, a link could be established to access the affected CFR, Federal Register Notices, Departmental Manuals, BLM Manuals/Handbooks, etc.

- * Assuming increasing public interest and broader internal involvement, newly issued directives would include comments received as well how they

were addressed in development of the final policy.

I. Formatting Manuals

Proposed Guidelines:

- * Manuals would be created in standard automated format; e.g., use WordPerfect Macros to ensure conformity and to facilitate development.
- * Pages would be numbered sequentially (1, 2, 3).
- * The same revision date would be placed on all pages when changes have been made; e.g., if a paragraph is inserted, the signature date would be the date used on all pages of that Manual Release. Readers would then be able to ascertain if they have the same version and/or the most recent version.
- * No release numbers would be used; the reader would rely on the Manual subject code and issuance date.
- * An automated "cumulative" transmittal page would be used. The full change or a brief description, would be included on the transmittal page. (See example below.)
- * Offices would have the option of printing and filing copies in paper format or electronically, for reference copies.

Cumulative Manual Transmittal Sheet (Example)

3853	4/1/95	MINERAL LEASING ACREAGE CONTROL RECORDS SYSTEM Subject code is changed from 3953. (LINK to exact change in Manual)
3853	8/24/95	MINERAL LEASING ACREAGE CONTROL RECORDS SYSTEM Eliminates use of detailed oil and gas acreage control records. (LINK to exact change in Manual)
3853	4/6/96	MINERAL LEASING ACREAGE CONTROL RECORDS SYSTEM Combines Forms 3853-3, 3853-4, and 3853-5, into a single Form 3853-10, and provides instructions for its use. (LINK to exact change in Manual)

J. Distribution of Directives

Proposed Guidelines:

- * Issue and distribute all directives, including any and all policy changes, electronically.
- * Use standard E-Mail addresses.
- * Original (record copy) prepared in the Washington Office must be retained at the Washington Office Directives Information Access Center (IAC); directives from State Office/Field Offices must be retained at those locations.

- o Once a search engine is developed and implemented on the Intranet, the Directives Digest Bulletin would be eliminated.
- * Most Bureau directives would be put on the Internet/Intranet and also distributed via Groupwise to responsible offices.
- * Directives would be in one location on Internet/Intranet.
- * Directives designated "non-public" would not be on Internet.
- * Directives placed on Internet/Intranet would include:
 - Date Issued
 - Number of IM
 - Office code
 - Subject
 - Subject code
 - Public Designated Access (P-Public, N-Non-Public, L-Limited)

Electronic Distribution Alternatives:

Alternative 1: GroupWise document to all responsible/interested individuals, and add to Intranet Directives site.

Alternative 2: GroupWise document only to office Bulletin Boards; users then access Groupwise Bulletin Board to find and retrieve.

Alternative 3: Send to Intranet Directives site only; users find and retrieve.

Alternative 4: Send to Intranet Directives site only, with notice via Groupwise to responsible/interested individuals.

SAMPLE OUTLINE FOR IM~5
(APPROPRIATE LETTERHEAD)

IN REPLY REFER TO:
1221 (540)

June 01, 1997

EMS Transmission - 00/00/00
Instruction Memorandum No. WO-97-1200-01

To: All Field Officials
Attn: Originators of Directives
From: Director
Subject: Generation of Directives DD 09/30/97
Access: Non-Public

[NOTE: The following are mandatory fields that would be completed for the body of the IM. If a certain field does not apply, it would still be listed and "None" would be shown.]

A. Policy.

1. Background
2. Issues
3. Objective
 - a) Responsibility
 - b) Action Required
4. Time Frames for Implementation
5. Budget/FTE Implications
6. Superseded/Deleted Policy

B. Performance Measures

C. Authority

D. References

Optional Fields:

E. Files and Records Maintenance (include target date for Manual incorporation)

F. Distribution

G. Other

Signed by:
Name
Title

Authenticated by:
Name
Title

(If policy overlaps into another office's program area, both Managers would sign.)

Signed by:
Name
Title

Authenticated by:
Name
Title

