



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

October 19, 2010

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

Subject: OCEFT in Transition

**From: Cynthia Giles, Assistant Administrator /s/
Office of Enforcement and Compliance Assurance**

To: All OCEFT Personnel

As EPA's Assistant Administrator for the Office of Enforcement and Compliance Assurance (OECA), one of my most important responsibilities is to oversee EPA's criminal enforcement program. Strong criminal enforcement is a key component of the agency's enforcement effort, providing an appropriate response and a powerful deterrent to those who engage in criminal violations of our environmental laws.

Our criminal investigators have a long and proud history of protecting Americans from environmental criminals and bringing them to justice. Every day our agents investigate environmental crimes and take action to deter law-breakers from committing crimes that would jeopardize our health and environment. In carrying out their duties, agents have a broad range of responsibilities that include gathering and reviewing evidence, understanding complex regulations, executing search warrants, arresting criminals when necessary, and defending themselves from criminals intent on eluding detection and arrest. The work of our agents requires a corresponding broad range of expertise, from technical and legal issues to confronting dangerous people and situations. Tackling this vitally important, challenging and demanding job requires rigorous training and the highest professional standards.

A Time of Change for OCEFT

All organizations experience times of transition, and we are now facing such a time for the Office of Criminal Enforcement, Forensics and Training (OCEFT). Fred Burnside, who has ably led OCEFT since 2008, has announced his retirement effective this December, after a long and distinguished career at EPA. As OECA Assistant Administrator, I have valued his advice and his perspective regarding both the criminal enforcement program and the broader activities of OECA as a whole. Given the current vacancy in OCEFT's Deputy Director position, Director Burnside's departure will mean that OCEFT will require a new leadership team.

Leadership changes, however, are not the only factors contributing to the challenges and opportunities that now confront OCEFT. As most of you know, an independent review of OCEFT personnel practices was recently completed, as was an organizational assessment survey requested by OCEFT's

Criminal Investigation Division (CID) and conducted by the Office of Personnel Management (OPM). The results of both of these efforts, and the independent review in particular, indicate that significant issues exist that warrant the attention of senior management in OECA and OCEFT.

One of the purposes of this memo is to inform you of the actions we are taking both to improve communication and management processes within CID, and to ensure that during this transition we maintain our focus on bringing environmental criminals to justice.

Review of CID management

In recent years CID managers have taken significant steps to improve agents' training and performance, and they have made laudable efforts to hold all employees accountable for their performance. These steps have led to a more effective and accountable work force and a better managed organization.

It is not surprising that management efforts to strengthen professionalism and accountability in any office would encounter some resistance. However, after being confirmed as Assistant Administrator, a number of concerns were raised to me questioning whether CID's approach to improving accountability was in every instance being carried out fairly and appropriately. In order to understand the employees' concerns, I decided to request an independent review and evaluation. To conduct this review, I sought out two well respected former EPA senior executives, Tom Voltaggio and Bill Finister.

Mr. Voltaggio's and Mr. Finister's charge was to speak with CID employees who wanted to talk to them, and to assess the organizational climate within CID to see how widespread concerns were. The reviewers were specifically directed not to review the details of individual personnel matters, which must be and are conducted and decided under rules and procedures required by law. Instead, they were tasked to engage a large number of employees, including agents and managers, to report back to me on what they heard, and to provide recommendations as to whether they believe changes may be appropriate.

As you know, Mr. Voltaggio and Mr. Finister made themselves available to talk to any and all OCEFT employees who were willing to speak with them, through arrangements made by OCEFT or anonymously. Approximately 60 current and former CID employees and managers, as well as others from OCEFT and elsewhere in EPA, took advantage of this opportunity. Mr. Voltaggio and Mr. Finister have now completed their work and provided me with the results and a number of recommendations. The major findings of their review are cited here, along with a summary of the actions that we are taking to address the recommendations.

It is important to note that Mr. Voltaggio and Mr. Finister operated under a number of constraints. Though they talked with a significant number of people, these individuals spoke to them on a voluntary basis, so the information they received reflects the views only of the people who were motivated to and comfortable with sharing their opinions. In addition, they were asked to review opinions and perspectives only; they did not, and were not asked to, investigate any of the underlying facts or circumstances that may have given rise to employee concerns, so they could not know if the opinions expressed were supported by the facts. To ensure that no private employee information was provided by OECA to the reviewers, they did not know the basis for agency action in individual cases.

Given these constraints, I believe the reviewers were not in a position to make many of the sweeping conclusions they made in their report. They did not have any information about the basis for agency action in individual cases, so were not in a position to assess whether the conduct of the employee

merited the action taken, and whether appropriate standards were used to make decisions, or the reasons for managers' decisions on personnel matters. Some of the statements in the review are inaccurate, go well beyond what the evidence supports, and do not appropriately reflect these acknowledged limits. Finally, some of the conclusions do not take into account the unique requirements of law enforcement. For example, the review reveals a misunderstanding of the weapons policy, which allows Special Agents to carry weapons while on duty, and does not reflect knowledge of agency policy to ensure safety of all employees in the workplace and the strict requirements that apply to all agents that carry weapons.

However, the review does identify important concerns that require attention. The principal issue identified during the course of the review was a concern shared by a number of those interviewed about the way CID has implemented efforts to promote effectiveness and accountability. Although the review applauds CID for undertaking the challenging job of increasing accountability, it notes that some employees are concerned about the manner in which this effort has been undertaken. Mr. Voltaggio and Mr. Finister also report that the lack of shared information about the reasons for some personnel decisions has led to the spread of rumors, creating in some places a climate of distrust about disciplinary matters. This concern is also evident in the OPM survey results.

I am committed to ensuring that all managers and employees understand that personnel management in CID, and OECA, will be carried out in a fair and respectful manner that is in accordance with the law and agency policies, and that is as transparent as possible without infringing on employee privacy rights. At the same time, our dedication to our vital environmental and health protection mission requires that all employees - managers and agents alike - must be held to high standards of conduct, as well as held accountable for their performance. We must ensure that all employees have confidence that everyone is expected to live up to high standards, and that all will be treated fairly and with respect.

The concerns expressed to the reviewers about communications and the handling of personnel matters in no way undermines my confidence in our shared commitment to protecting the health of the American public. Both reviewers were impressed with the dedication to mission that was evident across the organization. The strength of CID staff to carry out its important mission is further underscored by the 2010 OPM survey, which shows that 75 percent of CID public servants have a favorable opinion of their work environment and that 89 percent 'like the kind of work' they do. However, the concerns expressed by a significant percentage of CID employees in the Voltaggio and Finister review and certain parts of the organizational assessment call for a prompt and effective response.

The Path Forward

At the same time that we face the need to examine CID's communications and personnel management practices, and as mentioned above, we are also in a stage of transition in OCEFT's leadership. This provides us with additional challenges as well as opportunities for the future. Since Director Burnside will be retiring at the end of this year and OCEFT Deputy Director Ellen Stough retired earlier this year, I have decided to wait to appoint a new Deputy Director until Director Burnside's successor is named. We will begin our search for a permanent OCEFT Director immediately, followed by a renewed search for a new Deputy Director.

In addition, CID Director Becky Barnes has decided, after five years at the helm of CID, to pursue new challenges within the criminal enforcement program. Director Barnes will move to the OCEFT immediate office to manage key elements of OCEFT's policy, analysis and communications efforts as well as the transnational program. Further, she will oversee OCEFT's diversity recruitment program

and seek to integrate environmental justice appropriately into OCEFT priorities and operations. She has earned and certainly deserves this opportunity, having led CID through a period of great change, with many significant programmatic achievements due in large part to her contributions. Director Barnes will assume her new duties on November 7, 2010, when Daniel Horgan will become acting CID Director and Ed Goodwin will become acting CID Deputy Director, while Deputy Director Doug Parker remains on detail as the Acting Deputy Director of OECA's Office of Administration and Policy.

In order to provide the management attention and continuity that is needed to assure our continuing success during this time of transition, Howard Cantor, Director of OCEFT's National Enforcement Investigations Center, has at my request agreed to assume the role of Acting OCEFT Deputy Director immediately, and then, upon Director Burnside's retirement in December, become the Acting Director of OCEFT. I believe that Mr. Cantor's emphasis on clear and direct communication, as well as his experience in other parts of the Agency, will help provide the steady hand and inclusive vision that are essential in this time of transition.

Acting Deputy Director Cantor's main focus will be on two tasks: 1) improving communications throughout OCEFT, with particular emphasis on communication related to personnel actions and procedures; and 2) examining personnel procedures, and the implementation of those procedures, to ensure that OCEFT holds its workforce, including its managers, accountable in an appropriate manner. His work to carry out these tasks will be informed in part by some of the recommendations of Mr. Voltaggio and Mr. Finister and the findings of the OPM Organizational Assessment.

Consistent with those recommendations, and with sound management and communication practices, Acting Deputy Director Cantor will seek broad input from throughout the organization, including the Special Agent Advisory Committee and the line agents in the field. Among the issues on which Acting Deputy Director Cantor will focus is determining an appropriate and effective avenue for agents to communicate their concerns regarding personnel issues, and an appropriate and timely way for management to address those concerns. In addition, Acting Deputy Director Cantor and I will continue to consult with the Office of General Counsel and the Office of Human Resources to ensure that OCEFT's current personnel practices are consistent with all relevant EPA and OPM policies. Finally, all currently pending personnel actions in CID will be reviewed to ensure that they are being handled in accordance with the applicable regulations and policies.

A critical piece of the improvements for OCEFT under Acting Deputy Director Cantor's leadership will be delivering additional training and support for managers and staff. Further, he will seek to implement a mentoring program to assist all employees in effectively dealing with the challenges faced by law enforcement officers. After these initial steps are underway, I expect Acting Deputy Director Cantor to recommend additional actions he believes necessary to enhance the ability of OCEFT to carry out its mission.

In this period of transition until Director Burnside's retirement, and as he goes forward thereafter as the Acting Director, Mr. Cantor will have my full support and direct access to me on every issue.

Director Burnside has been an outstanding leader and public servant, and I have asked him to ensure that, during this time of transition, OCEFT continues to remain focused on its mission of investigating and assisting in the prosecution of environmental crimes. One of the OCEFT mission improvements that Director Burnside has initiated is an effort to integrate a more strategic case selection and targeting method for investigations that can have the largest and most important deterrent impact in priority areas of public health and environmental concern. I have asked Deputy Assistant Administrator Matt Bogoshian to work closely with Director Burnside and later his successor, Acting

Deputy Director Cantor, to build on the work already underway to advance this effort, to ensure we are strengthening public health and environmental protection.

Thank you all for your support and patience as we go through this period of transition. I ask each of you to join with me, and the people who have agreed to assume acting management positions, in working cooperatively and constructively towards implementing necessary changes that will help ensure we are providing all OCEFT employees with a supportive and productive work environment. I am confident that each of you will continue to demonstrate your exceptional dedication to carry out the important mission with which you have been entrusted.

Attachment

For a copy of the OCEFT review, click [here](#).

For a copy of the CID OPM survey information, click [here](#).

**Report to the Office of Enforcement and Compliance
Assurance**

**Review of Personnel Practices in the Office of Criminal
Enforcement Forensics & Training**

Federal Consulting Group

**William Finister
Thomas C. Voltaggio**

September 7, 2010

I - Background

The Federal Consulting Group was asked to make an independent review of personnel actions and practices in the Office of Criminal Enforcement Forensics & Training (OCEFT). Tom Voltaggio and Bill Finister, both members of the Federal Consulting Group performed this study and are hereafter called the “study team”. Between them, Bill and Tom have 75 years of federal experience, 50 years of which at EPA, serving as career SES executives in regional and headquarters positions.

II - Objective

OECA desired an independent review of OCEFT's personnel and management practices to provide recommendations for assuring that all personnel actions and practices taking place are appropriate and that all are held to the highest standards of conduct and performance. Views from managers, agents and support personnel were included in the review, with the focus both on what is working and what needs improvement. The study team took into consideration the criminal law enforcement mission of OCEFT and any unique mission-related features that may bear on OCEFT's personnel practices, however, the study team did *not* review the mission related activities of OCEFT. It focused solely on personnel issues.

III - Process

The process used for the study is listed below.

1. The study team obtained and analyzed background and historical information on OCEFT.
2. Due to the large number of employees in OCEFT and the large number of remote offices, it was not feasible to visit all offices and personally interview everyone who wished to speak with us. Upon consultation with OECA and OCEFT management, the study team visited Headquarters, Regions I, III, IV, VI and VIII. We also visited the Houston resident office. All other interviews were done telephonically and employees from each region were represented.
3. The largest amount of information for this study was obtained using an interview technique. Both members of the study team were present at the vast majority of the interviews. Interviews were confidential and not for attribution. Interviewees were divided into two categories – those who did not care if they were identified as speaking with us and those who wished to remain anonymous. Most of the people who requested anonymity informed the study team that they were concerned that their managers would learn of their discussions with the study team.

To accommodate the people who did not wish for their management to know of their interviews with us, the study team created a private email account using a popular web-based service (Gmail) and used that email box as a communication medium to arrange for anonymous interviews. No one from OECA has been granted access to that email account and the only persons authorized to access that account are the two members of the study team.

The following table summarizes the interview statistics:

Position Type	Number of Interviews
HQ Mgt	14
HQ Attorneys	5
HQ-Administrative	2
SACs	6
ASACs	5
RACs	4
Agents	38
Administrative	5
NEIC	4
RCEC	6
Retired SACs	4
Retired-Others	3
Others	3
Total	99
Gmail Requests	34

Each region was represented in the interviews, either in person or by phone.

In general, the interviews were between 60 and 90 minutes each and most interviewees were anxious to tell us their thoughts. They were appreciative of OECA's desire to perform this study and hoped that positive results would ensue. Almost to a person, interviewees strongly stated their opinion that since a lack of communications is a key problem in OCEFT, any report coming out of this study should be widely disseminated.

4. From the background and interview material, the study team analyzed the information and developed this report.

The study team wishes to acknowledge its appreciation to Jonathan Cole of OCEFT, who was of immeasurable assistance in arranging logistics for the interviews of those who did not request anonymity.

IV - Summary of Observations and Suggestions for Improvement

OCEFT's mission is crucial to the success of the agency. Criminal law enforcement is an important and necessary component of environmental protection, and throughout the study, the study team was highly impressed with the ability of the criminal enforcement program to meet its mandate.

The study team also applauds OCEFT's policy demanding accountability from their workforce. Although great credit needs to be given for the formation and development of the criminal enforcement program in EPA, a number of management practices over the first decades of the program appear to have raised serious questions regarding management performance, including accountability, performance, abuses in hiring, promotions, transfers and other personnel actions. Starting in the early to mid 2000's, OCEFT leadership embarked on a program to create a more accountable workforce by implementing management policies that brought about a better managed criminal enforcement program.

This accountability program consists of a vast array of management tools, such as elaborate performance standards that are more detailed than any witnessed by the study team, a new, stringent and detailed code of conduct for CID, more intensive use of its internal investigations unit, comprehensive training programs and other management tools to make clear the responsibilities of management and staff. It also includes well thought out and detailed procedures for hiring and promotions that are designed to assure fairness and equity.

Unfortunately, this good policy of demanding accountability appears to have been implemented in a way that, for many, has created a significant number of personnel abuses, including a workplace of fear, divisiveness, low morale and may have resulted in a significant loss of talented staff.

A – Summary of Observations

Based on the extensive interviews performed, the study team has made the following observations. More detailed analysis of the observations is provided in the body of the report.

- 1 Over the past several years, disciplinary actions have often been performed arrogantly and harshly. There appears to have been an overreliance on legal input to the disciplinary process to arrive at a personnel decision without the appropriate balancing of management's need to understand the factors that have contributed to the employee's

- 2 Implementation of OCEFT's elaborate performance standards and code of conduct allows for a zero tolerance environment which results in a near certainty that anyone can be shown to have performed poorly or has violated some provision at any time, no matter how insignificantly. Many employees fear that they can be disciplined severely for actions out of proportion to the actual violation, thus creating, at a minimum, paranoia, and, at its worst, perceptions of potential unequal implementation.
- 3 Communication from and to HQ, SACs and agents needs significant improvement. Alleged abuses and subsequent actions taken do not appear to always have been effectively communicated to HQ management, or if so, have not resulted in recognition by HQ management or their significant negative impact on workforce morale. Additionally, those disciplinary actions that have been appropriate also appear not to have been adequately and appropriately communicated to the employees. As a result, rumor mongering appears rampant.
- 4 There appears to be clear differences between the levels of performance oversight of management versus agents. Differences in the level of oversight and degree of quantification of performance standards of managers as compared to staff often appear to result in inconsistent application of performance and disciplinary processes depending upon the employee's place in the management hierarchy.
- 5 There appears to be a number of instances where information requests or communication to elevate issues of perceived unfair treatment by staff to offices outside of OCEFT have not only been inappropriately forbidden by management, but some employees making these requests have been threatened with charges of insubordination if they continued to pursue these communications.
- 6 It appears to the study team that in the absence of an aggressive diversity plan that includes a commitment to train and mentor minority employees, serious questions could and should be raised regarding the values of integrity, fairness and equity in the application of OCEFT's disciplinary action. Although several minorities believe that people of color were singled out for disciplinary actions and this has depleted their ranks in the workforce at both agent and management positions, the study team does not believe that racism, sexism, homophobia or age discrimination has been a driving force behind its disciplinary actions.

There are two camps within the organization - one of HQ managers and SACs and the other of agents and other staff. Many of the HQ managers and SACs seem convinced that they are doing the right thing to bring about much needed accountability. Unfortunately, this “end justifies the means” process that is often used to implement this policy appears to have created a fear ridden workplace where many agents and other staff feel they are in danger of losing their current jobs and/or future employment opportunities by the harshest implementation of disciplinary actions that the study team has ever witnessed. The effect on morale appears devastating. Many believe that this is an important reason why agents are leaving the organization. It appears that the reputation of OCEFT as a place to work is viewed poorly by law enforcement organizations outside of OCEFT. The recent OPM Organizational Study showed that 2/3 of the responders did not have a favorable view that disciplinary actions are applied fairly to employees, 1/2 believe there is not trust between employees and supervisors and almost 1/4 of the responders are considering leaving CID. The current implementation of the accountability program cannot continue without the potential for serious repercussions that could be devastating for OCEFT.

B – Summary of Suggestions for Improvement

The study team suggests the following steps be taken to bring about the goal of improving program accountability in a more appropriate manner. More detailed analysis of the suggestions for improvement is provided in the body of the report.

- 1 Thoroughly review and revamp the disciplinary process to provide a more balanced approach that respects the rights of the employee. Steps suggested are as follows:
 - a. Suspend all ongoing disciplinary actions, as well as Performance Improvement Plans (PIPs) and Performance Assistance Plans (PAPs) until an outside review assesses their appropriateness. Such review should be performed by the Office of the AA-OECA with assistance by OARM and OGC personnel.
 - b. Request oversight of future disciplinary actions be provided by AA-OECA assisted by OARM and OGC for a finite period of time until such time as OECA is satisfied with the appropriateness of the implementation of the process.
 - c. Request OARM provide intensive training for all management, including SACs, ASACs and HQ OCEFT management in the areas of EPA personnel and disciplinary processes. HQ management and SACs need to understand how the rest of the agency does disciplinary actions and uses Douglas Factors.

- d. Move the specialized HR function out of OCEFT and into OECA or OGC.
 - e. Consider whether the specialized CID code of conduct is necessary and if so, provide language such that de minimis violations are appropriately defined and handled.
 - f. Have a group of legal experts from within the agency and outside the agency examine OCEFT's use of "lack of candor" rationale for termination of OCEFT employees to determine if it has been appropriately used.
 - g. Assess whether the Professional Integrity and Quality Assurance Unit (PIQA) function is duplicative of the agency IG function. If PIQA remains, it should be outside the direction of OCEFT to remove any suspicion that PIQA is a tool of management to unfairly assist in disciplinary actions.
- 2 Create an employee liaison function in the immediate office of the AA-OECA with responsibilities to open up lines of communications with regional and resident office staff, and provide information regarding employee rights and agency processes for employee assistance.
 - 3 Develop an aggressive diversity program that not only includes hiring, but stresses training and, most importantly, mentoring of employees on a continuing basis.
 - 4 Improve the communications links to, from and among SACs and ASACs. Meetings between regional managers and HQ managers need to be frequent. Consider monthly conference calls and meetings several times annually. Use a part of these meetings to compare personnel practices and issues.

V - Brief Historical Context

A - Early Management of Criminal Enforcement Program

When the criminal enforcement program was established at EPA, managers and agents were drawn from people hired into EPA from other federal law enforcement agencies, most notably the US Secret Service. By the early 2000's, a network of managers and agents existed that appears to have been tightly knit and developed its own law enforcement culture that was markedly different from the culture that existed in the rest of EPA.

SACs and Agents were reportedly not strongly managed and were generally left to plan and implement their own work without sufficient direction or emphasis on

programmatic goals or areas of emphasis. Most SACs and agents liked the freedom from headquarters oversight; nevertheless many recognized that it made national management of the program difficult.

A second area of criticism that was expressed by the interviewees was the “cronyism” that existed at that time in hiring, promotions, transfers and other personnel actions of agents and managers. The “good old boy” network seemed to be the way that people moved up the organization and, as a result, most interviewees believed that many managers did not have the knowledge, skills or abilities to properly manage their offices. Although some interviewees believed that some of these early leaders were “good agents” and set up the criminal enforcement program at EPA from scratch using good knowledge and skills honed from more established federal law enforcement agencies, it was almost universally held that the lack of accountability and cronyism were major deficiencies in the operation of EPA’s criminal enforcement program.

Another threshold concern raised by many interviewees was the belated attempt approximately 10 years ago to hire minorities and place them into positions of responsibility. While no interviewee disagreed with the concept, there was much criticism that people with limited experience in law enforcement were hired and assigned into the criminal enforcement program to “boost statistics” without the appropriate level of development and mentoring that is so important in developing good agents. The study team believes that this lack of development and mentoring would go on to cause significant problems in the decade of the 2000’s.

The Management Review of the Office of Criminal Enforcement, Forensics and Training, dated November 23, 2003 (hereinafter called the Meiburg Report), was a study performed by then Region IV Deputy Regional Administrator, Stanley Meiburg to perform a management review of OCEFT by answering five questions forwarded by then Assistant Administrator for OECA, John Peter Suarez. Many of the issues covered in the Meiburg Report are outside the scope of this study, nevertheless, that report did touch upon several areas which overlap the issues in this report.

B - Change in Management Philosophy – Improving Accountability

Implementation of the recommendations of the Meiburg Report coincided with a marked change in the overall management of the criminal enforcement program, with the emphasis placed upon improving program accountability. This marks a watershed in how HQ program management interacted with their managers and staff. The study team believes that improving accountability at all levels of the organization is an admirable goal and worthy of praise and recognition. There were a number of important positive developments that came out of this change in management philosophy, including better planning and implementation of national enforcement goals, enhanced training and other important changes.

Notwithstanding these positive changes, a number of changes have been made over the past six years to personnel practices and procedures in the name of improving accountability that appear to have been, and continue to be, inappropriate and are the subject of this report. These changes in personnel practices and procedures can best be described as good ideas implemented poorly, thus creating an “end justifies the means” philosophy that some believe have damaged careers, caused employees to be treated disrespectfully and has resulted in a climate of fear and hostility throughout much of OCEFT.

VI - Observations of Study Team

A – Disciplinary Actions Are Frequently Done Arrogantly and Harshly

The number of interviewees who have provided first-hand accounts of arrogant and harsh treatment during the disciplinary process by management over the past 5+ years are too numerous to be attributed to sour grapes among a few bad apples. The study team interviewed scores of employees, many of whom were directly affected and many more of whom were simply observers of the manner in which others were the object of inappropriate application of disciplinary actions. The study team also interviewed managers themselves, some of whom corroborated much of the inappropriate behavior and believed that it was appropriate for the situations.

The study team wishes to make it clear that they did not evaluate whether or not the conduct that was the subject of many of these actions was worthy of the need for discipline. Rather it focused upon the manner in which these actions were performed.

EPA has a Conduct and Discipline Manual which is required to be used for all instances of conduct and discipline issues in the agency. The Human Resources office in OARM and OGC are the usual sources of expertise in conducting these processes. If investigations are necessary, the IG is brought in. It appears to the study team that OCEFT has decided to develop its own expertise in managing disciplinary matters. It has recruited into its own legal group an attorney from outside the agency to handle labor relations issues, developed its own code of conduct and increasingly utilizes its own investigations unit (PIQA). In fact, many of the OCEFT personnel disciplinary practices reviewed in this study were independent even of the processes used in the rest of OECA.

Because of their culture and past experience, SACs and other OCEFT managers generally appear not to be highly experienced in dealing with performance or conduct issues. It appears to the study team that when the SACs or other managers perceive a performance or conduct problem, they rely heavily on support from HQ, and specifically the labor relations attorney. The study team

believes that the support provided by the labor relations attorney in OCEFT is overly focused on what is legally possible to be done. Combined with OCEFT management's lack of knowledge, skills and abilities relating to how disciplinary actions should be done, what is legally possible becomes the process used and overkill becomes the norm.

It appears to the study team that many disciplinary actions are not subject to the types of checks and balances that would ensue if EPA organizations outside of OCEFT would review and assess OCEFT's actions. In fact, the study team believes that this existing process has allowed many reported disciplinary actions to proceed unchecked resulting in unreasonable personnel management behavior.

Some examples reported by interviewees are:

- involuntary transfers used as a means of punishment
- initiation or escalation of disciplinary actions after filing of Equal Employment Opportunity (EEO), Office of Special Counsel (OSC) or Inspector General (IG) complaints
- unreasonably excessive demands to report to management during PIPs and PAPs
- threats of insubordination if employees request information or utilize legally appropriate means to question supervisors decisions
- requirements to regularly travel to a different geographical location to be supervised more closely

EPA's Conduct and Discipline manual describes the process of escalation of punishment for conduct issues. The matrix incorporated in the Manual is meant to guide managers on initiating punishment to fit the gravity of the offense and provides a roadmap for taking appropriate personnel actions. Managers who propose or decide on disciplinary actions need to consider the so called "Douglas Factors" to be used to determine the appropriate penalty. These 12 factors include consideration of the employees past record, consistency with other agency actions, clarity of notice, potential for rehabilitation, etc. The study team was not tasked to review specific actions, and did not have access to records of specific disciplinary proceedings, thus has no information regarding utilization of the Douglas Factors, but some of these actions reported by interviewees give rise to the question as to whether the agency process was appropriately followed in many of these instances.

The extent of the emphasis OCEFT has put into disciplinary actions can be seen from the fact that 37 disciplinary actions have been completed or are currently pending in just the past three years. Of these actions, 25 are in regional CID offices. Another yardstick to consider is the number of cases referred to employee protection organizations outside of EPA, such as Office of Special Counsel, the Merit Systems Protection Board, etc. Although the study team

would not consider using this as a yardstick by itself, combined with what it has seen and heard, it raises serious questions as to the appropriateness of OCEFT's disciplinary process.

B – Overly Elaborate Performance Standards and OCEFT Code of Conduct Used Against Employees

The study team has had decades of experience with performance standards in EPA. There is no question that, in general, EPA needs to improve the manner in which performance standards are written and performance evaluations are performed in the Agency. Insufficient time is placed on both aspects and the result is a process that is somewhat flawed and needs improvement. To its credit, OCEFT has taken measures to improve the performance standard and evaluation process for its employees. However, it has created such an inordinately detailed, complex, voluminous and overly quantitative set of requirements that it appears to either have led to incredibly poor implementation with serious unintended consequences, or to have been used as a convenient tool for some in management to weed out employees.

The 19 page OCEFT Code of Conduct is yet another example of a good idea that has been overly designed and harshly implemented. The study team has heard the argument that criminal investigators are law enforcement officials and need a stricter set of standards than the rest of the Agency; nevertheless, EPA has its own code of conduct for the rest of the Agency and has used it as a basis for conduct and discipline throughout its history. The OCEFT Code of Conduct contains such detailed and overbearing provisions that, depending on interpretation, may make it impossible for an employee to be in compliance with it at all times. Since some violations of the Code of Conduct have been considered serious offenses, those violations are subject to be used by some in management to inappropriately discipline employees.

Of particular significance in the Code of Conduct is the concept of "lack of candor". The study team has been briefed by both legal and management personnel regarding the importance of the Giglio issues and is not competent to make legal judgments regarding what constitutes in the words of the Department of Justice policy:

“...a finding of lack of candor during an administrative inquiry.”

The study team has been told that "lack of candor" has been used several times in the removal of agents. It is a very powerful tool, since it has seriously negative impacts for an agent who is removed from gaining a law enforcement position in the future.

Even to the layman, it is apparent that the use of judgment by the deciding official is crucial to making an appropriate decision as to what constitutes a lack of candor under the Giglio Policy. What the study team has seen is that:

1. "Lack of candor" is not defined in the Code of Conduct or DOJ's "Giglio Policy".
2. The 19 page detailed OCEFT Code of Conduct provides many opportunities for violations depending on how harsh OCEFT management wishes to judge the employee.
3. Any conversation regarding employees' conduct or performance can result in a charge of "lack of candor" if management finds them to be untrue – no matter how insignificant the issue.
4. OCEFT management's judgments regarding disciplinary actions in the past have been seen as unfair or inequitable by a substantial number of OCEFT employees.

As a result, many OCEFT employees are fearful that at any time they can be the subject of actions that can result in their dismissal and inability to find future work.

C – Pressing Need to Improve Coordination and Communication

In many ways, the HQ OCEFT office has a significant amount of programmatic interaction with SACs regarding case prioritization, reporting, approval of significant actions, etc. This appears to have come about as a result of the desire by HQ to control case selection such that criminal cases are consistent with Agency goals and policy.

The study team has observed that for a number of regions, communications to the SAC from HQ do not usually filter down to ASACs, RACs and agents as much as they should. There are a number of vehicles that can be used to keep agents informed, including, but not limited to, weekly staff meetings, conference calls, emails, etc. Since the above are not used on a regular basis to inform agents, speculation and rumor are the chief means used by them to keep informed. It appears that HQ OCEFT management interacts mostly with the SACs, without ensuring that SACs are required to communicate further down the chain of command. This lack of communication appears to be an important component that leads to apprehension and uncertainty.

When conduct and discipline issues arise, the rumor mill, with all its concomitant inaccuracies and exaggerations becomes the only available source of information. In most serious disciplinary actions in the recent past that have resulted in removals or long suspensions, there has been an absolute silence from management. The study team is aware of the privacy concerns regarding communication of results of disciplinary actions, but OCEFT has taken this to

such an extreme that it provides no information whatsoever, thereby creating serious morale problems.

There are ways for results of disciplinary actions to be discussed while maintaining the privacy and decorum that is necessary. The rest of the organization needs to know something about what happened, so that life can go on and employees can feel that their management is on top of things and has appropriate, fair and step-wise processes to deal with employee conduct and discipline. Communications that deal with numbers and types of disciplinary actions (as opposed to naming individuals) can serve this purpose as well as other types of mechanisms that OARM and others can provide.

In summary, OCEFT management needs to appreciate the devastating effects of having the rumor mill be the only source of communications between agents, especially for communication of the results of disciplinary actions, as well as other personnel related actions.

D – Clear Differences in the Level of Performance Oversight of Management versus Agents

The command and control culture of staff in field offices is strong. SACs and ASACs have day-to-day supervision of activities and staff performance is heavily monitored against exceedingly detailed and quantitative requirements in their performance standards, code of conduct and operating procedures. Departures from the norms established in these standards, codes and procedures are readily observed and acted upon quickly and strongly to ensure the program accountability that OCEFT senior management has stressed for the past several years. In fact, many of the complaints heard by the study team result from the numerous performance and disciplinary actions that have been and are being implemented as a result of agents not conforming with these requirements.

For obvious reasons of autonomy necessitated by geographical placement of regional offices, as well as the recognition that more senior level managers should not need close supervision, SACs do not have the same types of strong quantitative requirements as those that agents have – requirements for which full compliance by the agents is so difficult. When one combines the lesser degree of oversight with the less quantitative performance requirements, this appears to result in inconsistent application of performance and disciplinary processes depending upon the place in the management hierarchy.

The study team recognizes that it is common for staff employees to have a somewhat naive view of unequal treatment of managers and staff. What makes this situation different and more egregious than what the study team has ever experienced is the degree to which some in management appear to have misused these exceedingly harsh and detailed requirements and overbearingly

close oversight to severely discipline staff employees to the point of suspension and termination.

Most thoughtful people will accept strict disciplinary processes if they feel all are equally subject. Many interviewees have indicated that they do not see such an equitable application of this strictness when applied to management versus agents.

E – The Law Enforcement Culture of Management Contributes to a Restraint of Employees Rights to Elevate Issues

The study team believes that with a few exceptions, OCEFT HQ management and most SACs have come from a background of what the rest of EPA would consider an extreme command and control environment. We understand that this command and control environment is a manifestation of the law enforcement culture that exists in other federal and local law enforcement organizations, and that in this culture, the manager (or SAC in this case) is in charge and more often than not, does not appreciate questioning of commands or desires by subordinates to participate in the decision making process.

The study team acknowledges that this law enforcement culture is foreign to their combined experiences in EPA. Nevertheless, this law enforcement culture exists within the larger organization of EPA, which is a regulatory agency with a proud 40 year history of collegial and participatory relationships between management and staff. OECA must decide if the OCEFT law enforcement culture is necessary for its smooth functioning or if the negative aspects of this culture on a modern regulatory organization with participatory and collegial interaction between management and staff should result in modifications to current OCEFT processes and procedures.

Although a careful reading of the CID Code of Conduct forbids the practice, the study team has been made aware of a number of alleged instances where information requests or communication to elevate issues of perceived unfair treatment to offices outside of OCEFT has not only been inappropriately forbidden by management, but such employees have been threatened with charges of insubordination if they continued to pursue these communications. The study team has attempted to understand how, if true, this has been allowed to happen. A likely explanation is that the SACs, who have a great deal of interaction with HQ management in programmatic issues, have been allowed to handle most of the initial processes and procedures for conduct and disciplinary actions without significant interaction by HQ management, other than the labor relations counsel in LCD.

This law enforcement culture of some SACs not appreciating questioning of commands which conflicts with the rights of the employees to question decisions made by management has likely resulted in these conflicts and the inappropriate

stifling of employees' rightful elevation of issues, especially to offices outside of OCEFT.

F – Racism, Sexism, or Other Forms of Discrimination do NOT Appear to be Active Contributors to Personnel Actions Taken by OCEFT

According to a large number of interview discussions, minority employees were brought in during the early 2000's and some put into positions of management with what many of the interviewees believed was inadequate training for those positions. When performance issues arose, they were easy targets for disciplinary actions. What appeared to have been most needed was a program of mentoring of these employees such that they should have been assisted in their development beyond the training that everyone else got. The study group feels that had a conscious effort been made to go beyond the minimum for those employees and employees groups, it would have signaled that OCEFT wishes to have a more diverse workforce. It simply has not been done in OCEFT – not then and still not now.

A modern organization that values diversity recognizes that there is value in emphasizing this in its workforce. If there are obstacles, such as a need to improve the training and experiences of a more diverse workforce, it overcomes these obstacles with programs that are directed to those needs. OCEFT has not shown this necessary emphasis. It does not have an active Diversity Action Plan beyond the recruiting process and as far as training is concerned, it simply throws everyone in the pool together to sink or swim and has truly been blind to special needs. The area where OCEFT has been most remiss is in the area of mentoring.

OCEFT's performance system creates such complex and detailed conduct and performance requirements that anyone could be shown to be in violation. In addition, it uses such a command and control management philosophy that brooks no questioning of orders, and does not recognize the strengths of considering the diversity of views held by people outside their culture. Combined with a failure in mentoring, this can lead to a perception that the higher percentage of un-mentored minority hires who received personnel actions were carried out in a discriminatory fashion. We do not find that discrimination occurred, but the practice makes OCEFT vulnerable to that perception. In view of the above, it appears to the study team that in the absence of an aggressive diversity plan that includes a commitment to train and mentor minority employees, serious questions could and should be raised regarding the values of integrity, fairness and equity in the application of a number of past and present disciplinary actions.

It is management's job to assure that decisions that could be based upon discrimination be carefully reviewed and be judged by a standard that reflects

this Agency's EEO goals notwithstanding whether or not the action passes a legal test of non-discrimination. It is OCEFT and OECA senior management's job to ensure this happens at all levels in the organization.

Although the study team does not believe that racism, sexism, homophobia or age discrimination has been a driving force behind its disciplinary actions, and most interviewees tend to confirm this view, several minorities do believe that they were singled out because of these issues. Upon careful review of the instances raised by the interviewees, the study team believes that the concerns raised in the report were applied to employees without any apparent or overt displays of behavior that would be forbidden by laws, regulations or policies that prohibit discrimination.

VII – Suggestions for Improvement

The study team has heard many recommendations from interviewees regarding what needs to be done to make OCEFT a well-functioning, credible organization that meets its programmatic needs while valuing all its employees. These recommendations have come from managers, agents, attorneys, and administrative staff in OCEFT as well as observers outside OCEFT.

First, it is important to recognize the limitations of non law-enforcement reviewers making suggestions for a law enforcement unit. We are always subject to being called naïve or unfamiliar with the law enforcement culture. We accept this. Nevertheless, we do have over 75 years of federal experience and almost 50 years in EPA at staff, management and executive levels. What's right is right. Some things are universal, regardless of culture. In areas where we do not believe that we have the necessary expertise to suggest a specific improvement, we suggest that others perform the assessment. In other areas, we believe we have the expertise to suggest the improvements.

A – Thoroughly Review and Revamp the Disciplinary Process

From everything that we have heard and witnessed there needs to be a mid-course correction and more balanced approach as to the manner in which legal advice is folded in to decisions regarding the rights of OCEFT employees during the disciplinary process. It is imperative that there be more counseling across the board and managers in the field need more options to deal with performance and disciplinary problems rather than following the axiom that if it's legal, it's defensible. OCEFT should spend time on options that have a rehabilitative focus rather than those that solely deal with the maximum punishment allowed by law. In considering this revamping, the study team suggests the following:

- 1 *Suspend all disciplinary actions, including PIPs and PAPs until an outside review assesses their appropriateness. Such review should be led by the*

specialists.

The overly litigious and harsh legal input to performance, conduct and disciplinary actions, reported by interviewees to have been unbalanced by the use of potential for rehabilitation or the use of Douglas Factors, could have resulted in a significant number of potentially tainted decisions regarding these actions. Many of these decisions are still in progress and OCEFT employees are likely to be suffering the consequences of what may be overly harsh and inappropriate actions. On the other hand, many, most or perhaps all of these ongoing actions may be entirely appropriate. The study team was not charged to look into the actual facts of these actions, just to review the process. We strongly believe that the process has been so tainted as to warrant the extraordinary step of suspending these actions until a decision can be made by employment expertise *outside of OCEFT* as to whether these actions are appropriate and whether they are being implemented in a fair and just manner consistent with EPA's Conduct and Discipline Manual.

In addition, the study team suggests that OECA be assured that involuntary transfers to locations outside of the employees' commuting area are done for legitimate government need and that any action for involuntary transfer be reviewed by the OCEFT director and the OECA DAA. Further, involuntary transfers should not be implemented during a PIP, PAP, disciplinary action, or while there is a pending request for an outside review to the Office of Special Counsel, IG or other appropriate reviewing agency.

2 *Oversight of future disciplinary actions should be provided by OECA, OARM and OGC for a period of time.*

OECA, with the assistance of OARM and OGC should review future serious performance and disciplinary actions in OCEFT at the proposal stage for a finite period of time until OECA management is assured that appropriate processes are in place and working well.

3 *OARM provide intensive training for all management, including SACs, ASACs and HQ OCEFT management of EPA personnel and disciplinary processes.*

HQ management and SACs need to understand how the rest of the agency does disciplinary actions, including an understanding of EPA's Conduct and Discipline Manual, the use of Douglas Factors and other Agency-wide processes used in dealing with performance, conduct and discipline issues. OARM, being the central Agency expert on these matters should provide training and guidance on these issues as soon as

possible. Factors considering the law enforcement nature of OCEFT should be included and assistance requested of other Federal law enforcement agencies.

4 *Move the specialized HR function out of OCEFT and into OECA or OGC.*

The presence of a specialized labor function just for OCEFT creates a situation, where either management is not seeing or chooses to avoid its responsibility to exercise judgment and reason in the consideration of steps in performance, conduct and discipline situations. Management needs to step up and take the legal input for what it is – just input. The decision as to what needs to be done rests squarely with management. Unfortunately, in the past several years, management has not stepped up to balance the legal input with negative implications for employee morale and OCEFT's personnel system. The study team suggests that there is no need for this specialized labor relations function to be housed in OCEFT, but be shared and balanced with the rest of OECA or the Agency and be housed in either OECA or OGC. OCEFT management can then proceed the way the rest of the Agency does and use its management chain, OECA and OARM to assist with labor relations issues.

5 *Consider whether the specialized CID code of conduct is necessary.*

The other 17,000 employees in EPA adhere to the Agency Code of Conduct. OGC and OECA should study the rationale for this additional code of conduct and report back to the AA-OECA with its opinion as to whether such an additional code of conduct is necessary and/or desirable. In addition, if the decision is that it is appropriate, the study team suggests that an appropriate entity outside of OCEFT review the wording of the code to determine if it is overly broad and provide language such that de minimis violations are appropriately defined and handled.

6 *Review the use of "lack of candor" in disciplinary actions.*

Have a group of legal experts from within the agency and outside the agency examine OCEFT's use of "lack of candor" rationale for termination of OCEFT employees to determine if it has been appropriately used. Special emphasis should be placed on the overly broad interpretation in current use in OCEFT and whether further guidance can be provided by OGC or DOJ.

7 *Review the need for and use of the Professional Integrity and Quality Assurance Unit (PIQA) function.*

The study team questions whether internal investigative functions of PIQA are duplicative of the agency IG function. We suggest that the IG be

consulted to provide advice to OECA as to the need for PIQA, the methods used to investigate OCEFT employees and the history of its use as an appropriate investigative arm for OCEFT. If PIQA does remain in OCEFT, the study team suggests that it should report to the DAA for OECA to remove any suspicion that PIQA is being used inappropriately by OCEFT management.

B – Create a Management Oriented Liaison Function for HQ/Regional Employees

Given the study team's belief of the existence of an atmosphere of fear and uncertainty, coupled with a lack of trust by many, a general feeling pervades the workforce that management has not displayed the moral imperative needed to support, protect, and defend them from a number of actions management has taken in its implementation of performance and disciplinary procedures. There is also great angst pertaining to the recruitment, hiring, travel, and comp-time processes expressed by many.

It appears that in order to directly address these issues, there should be a person outside of OCEFT who has a strong management background, good interpersonal skills, is a good communicator and one who is seen as just and fair by employees both in HQ and the regions. This person should be given a broad portfolio to deal with the problems that have been raised, including having the authority to resolve minor issues and intercede with senior management in OCEFT, and in appropriate cases, directly with OECA for major issues. He/she should be assigned to the Office of Labor Relations in OECA reporting to both the AA/DAA of OECA as well as the Director of OCEFT. If this is implemented, it will raise the integrity of personnel processes to a new and sustainable level.

C – Develop a Much More Aggressive Diversity Action Program

The current Diversity Action Program consists of a recruiting plan that appears to have the right elements. What appears to be lacking is a concentrated effort in training, mentoring and employee development. A more aggressive Diversity Action Program that addresses these elements is crucial for the ability of OCEFT to be a workplace of choice to all employees.

A mentoring program is most important at this point. A strong effort to provide needed training and mentoring is crucial for the ability of OCEFT to move forward. Closer coordination with OECA management and OARM to assist in the development of such a training and mentoring program would be of great benefit.

D – Improve Communication Links

Communications links to, from and among SACs, ASACs, agents and administrative personnel need to be strengthened. Meetings between regional

managers and HQ managers need to be more frequent. The study team suggests that there should be monthly or bi-monthly conference calls and meetings two or three times annually with all SACs and ASACs and HQ management. These meetings should focus not only on the important programmatic concerns, but also administrative and personnel issues that could be shared among the offices, such that the information freely flows among and between regions.

In addition, there needs to be much more formalized communications between the SACs and the rest of the regional and resident offices. Many times information transfer ends at the SAC and the rest of the regional and resident offices appear to be unaware about happenings in OCEFT or issues discussed on SAC calls or meetings. This form of communication could be meetings, email messages or use of EPA@work. Agents and other administrative employees will benefit from such action because it will increase their knowledge base, reduce the likelihood of rumor and speculation, and provide them with a better understanding of OCEFT/OCID policies and procedures that govern the way they perform their duties and responsibilities.

VIII – Other Issues

A – NEIC

The study team was approached by several employees in NEIC who described concerns regarding personnel practices in one of the NEIC units. Although NEIC was outside the scope of the study, the study team listened to their concerns, a number of which appeared to be credible. NEIC senior management appears to be actively addressing these issues and the study team suggests that this continue.

B – Carrying Loaded Weapons in Regional Offices

The study team was puzzled by the seeming inconsistency regarding the carrying of loaded weapons in the regional offices. The CID Code of Conduct clearly states in Section 18(i)(iii) that unless: “authorized and required in the performance of duty, employees will not carry firearms, either openly or concealed, while on government property or on official duty.”

Notwithstanding this apparently clear directive, the study team has witnessed firearms being carried in most of the CID offices it visited. In addition, it was explained that firearms policy required that a live round be chambered at all times when carrying the weapon – even in the regional office.

When questioned about this, most interviewees thought it entirely appropriate to carry firearms while working in the regional offices and stated that they felt more comfortable carrying the weapon; they were more prepared for incidents should

they occur and their management authorized it. There was at least one office where management seemed to comply with the direction in the Code of Conduct and forbade the carrying of weapons while working in the regional office.

The study team has been told by several interviewees that there have been a number of verbal altercations between management and staff in CID offices within regional offices that have risen to the level of having been heated and threatening. Although it appears that agents are otherwise using their weapons appropriately, the potential for workplace violence should always be an important management concern. OCEFT management must consider whether the firearms policy needs to be further evaluated regarding the carrying of loaded weapons in regional offices and how it wishes to enforce this policy.

C – Homeland Security Functions

During the interview process, the study team was informed of discussions relating to changes to the locations of homeland security functions in OCEFT. This subject caused anxiety among a number of the interviewees regarding how these functions would be integrated into traditional CID activities and to what extent the grade structure and promotional opportunities could be affected. This issue was outside the scope of this study, nevertheless the study team believes that effectively communicating the process and eventual results of this evaluation is crucial to the employees who feel they could be adversely affected by this issue.

IX – Conclusions

OCEFT is at a crossroad. Some evidence indicates that the problems revealed in this report are an important factor for some agents in leaving. The recent OPM Organizational Survey reflects the discouragingly high number of staff looking to leave OCEFT. The thoughtlessness and arrogance that has been apparently displayed by many in management over the past several years needs to be replaced by a new paradigm that encourages transparency, respect, dignity and freedom of expression for all its employees. Only then will OCEFT regain the maximum amount of respect and trust of its workforce. Now is the time for senior management to lead this crucially important endeavor.



A New Day for the Civil Service

2010 Organizational Assessment Survey

EPA-CID

June 1, 2010

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202-606-0169

Organizational Assessment
HR Strategy & Evaluation
Leadership & Talent Management Solutions

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Outline

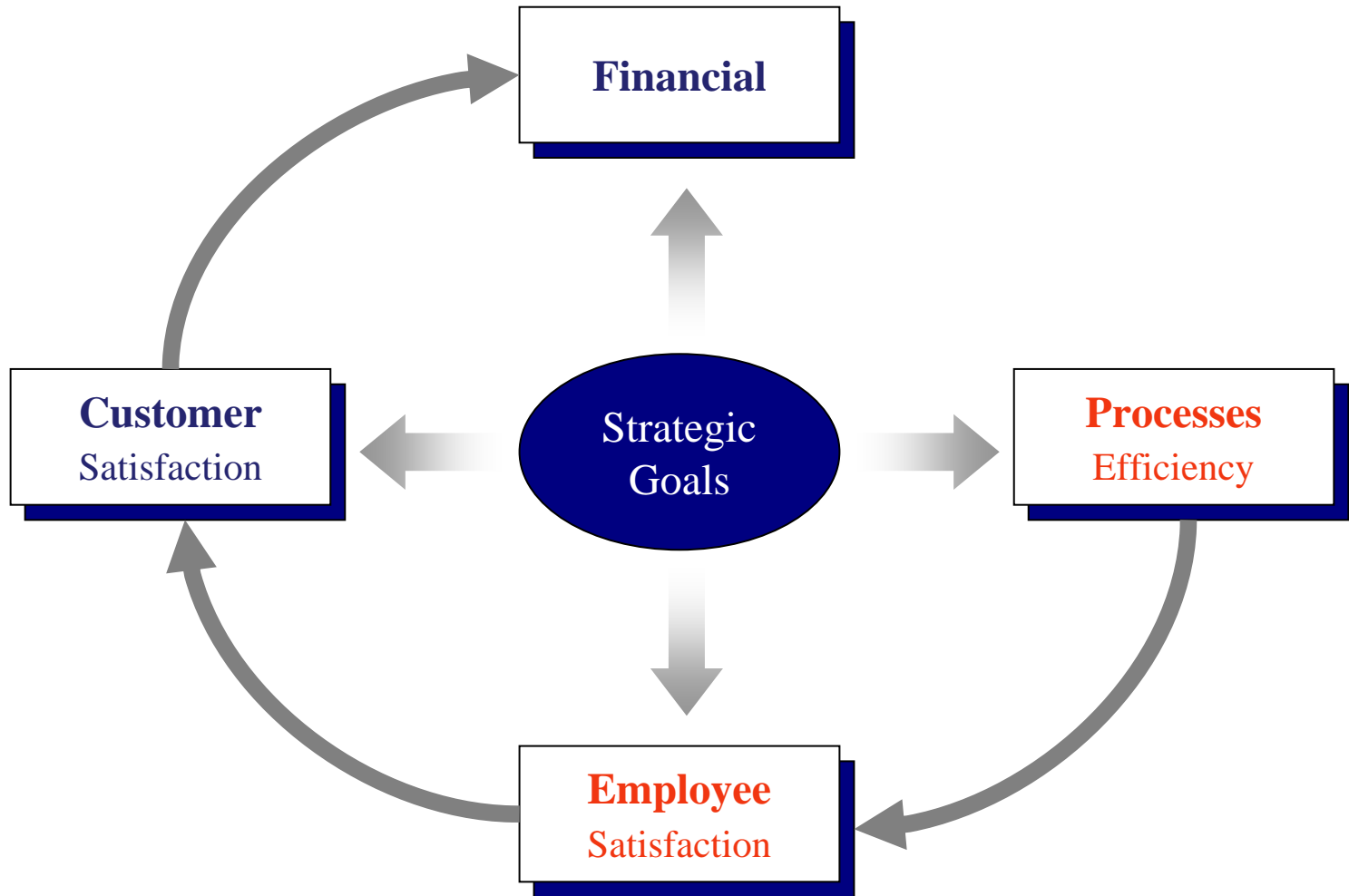
- Background
- Method
- Demographics
- High-Level Results
- Item Results
- Private Industry Benchmarks
- Group Differences
- Summary
- Recommendations/Next Steps

Purpose of the OAS

- Assess organizational climate and culture on 17 high-performance dimensions (16 for EPA-CID)
- Benchmark with other agencies and private sector
- Use results to make organizational improvements
- Use results in strategic planning
- Improve organizational effectiveness

Balanced Measures

Use OAS data as part of a balanced measurement system

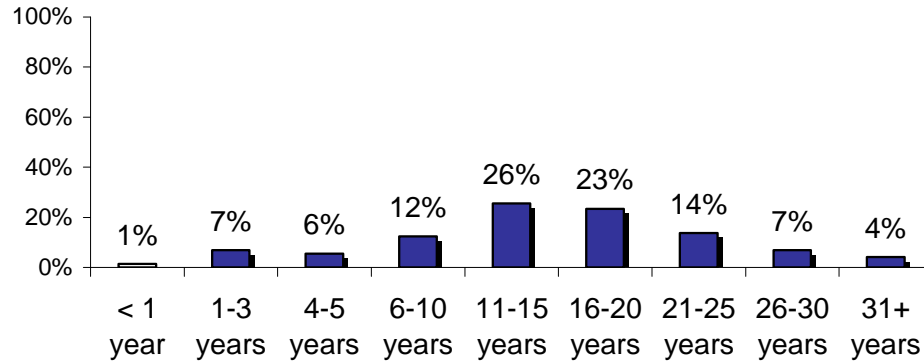


OAS Methodology

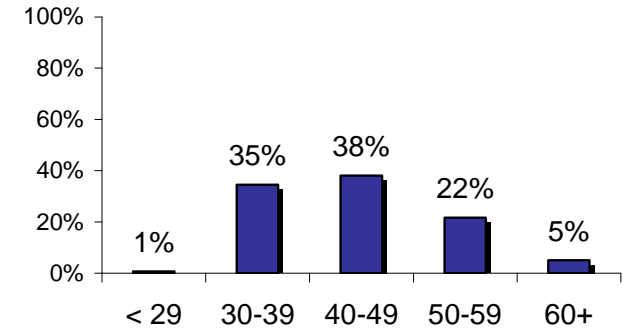
- EPA-CID's first OAS administration
- 140 items, including 21 agency-specific items
- Administered online from March – April, 2010
- Administered to all employees (211)
- 72% response rate (211 submissions / 151 employees)
- Maximum margin of error: ± 4.26 percentage points
- Deliverables
 - Hard copy reports
 - Briefing
 - Online reports
 - Comment reports

Demographics of Survey Respondents

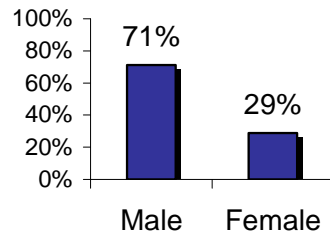
Federal Tenure



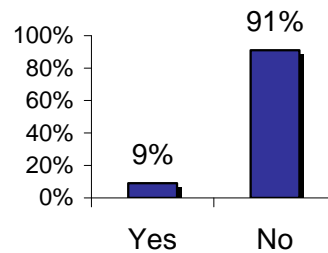
Age



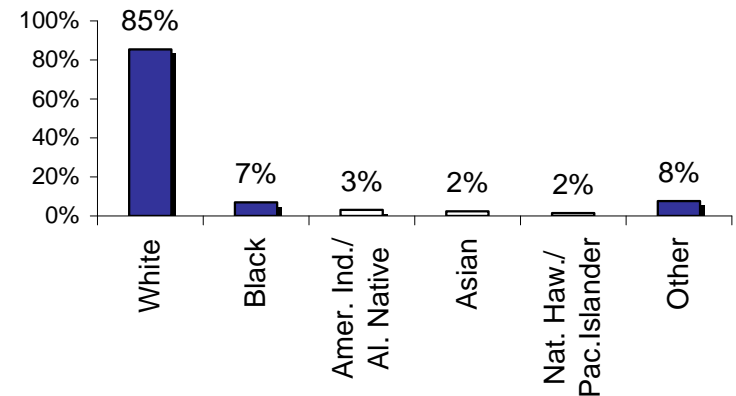
Gender



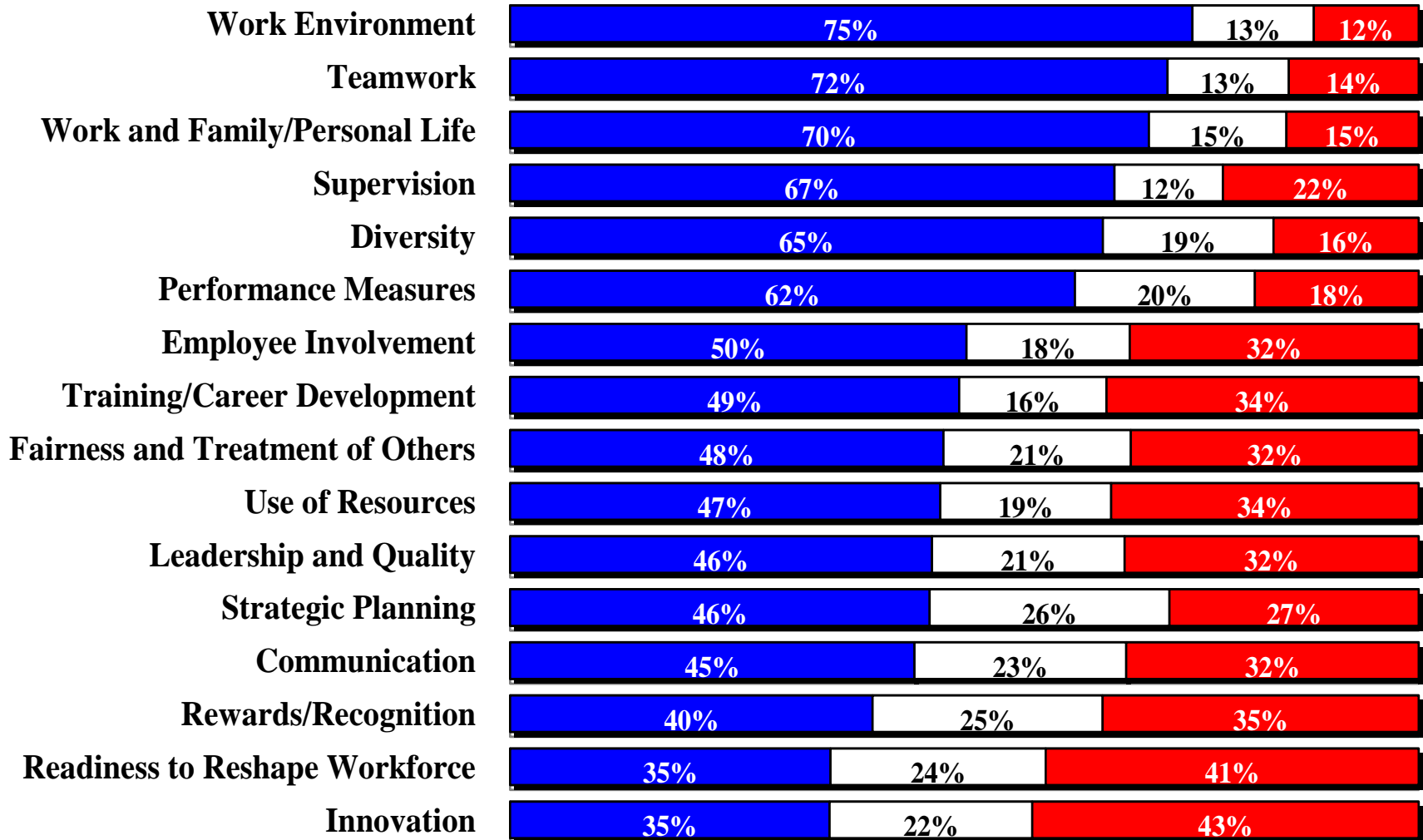
Hispanic



Race

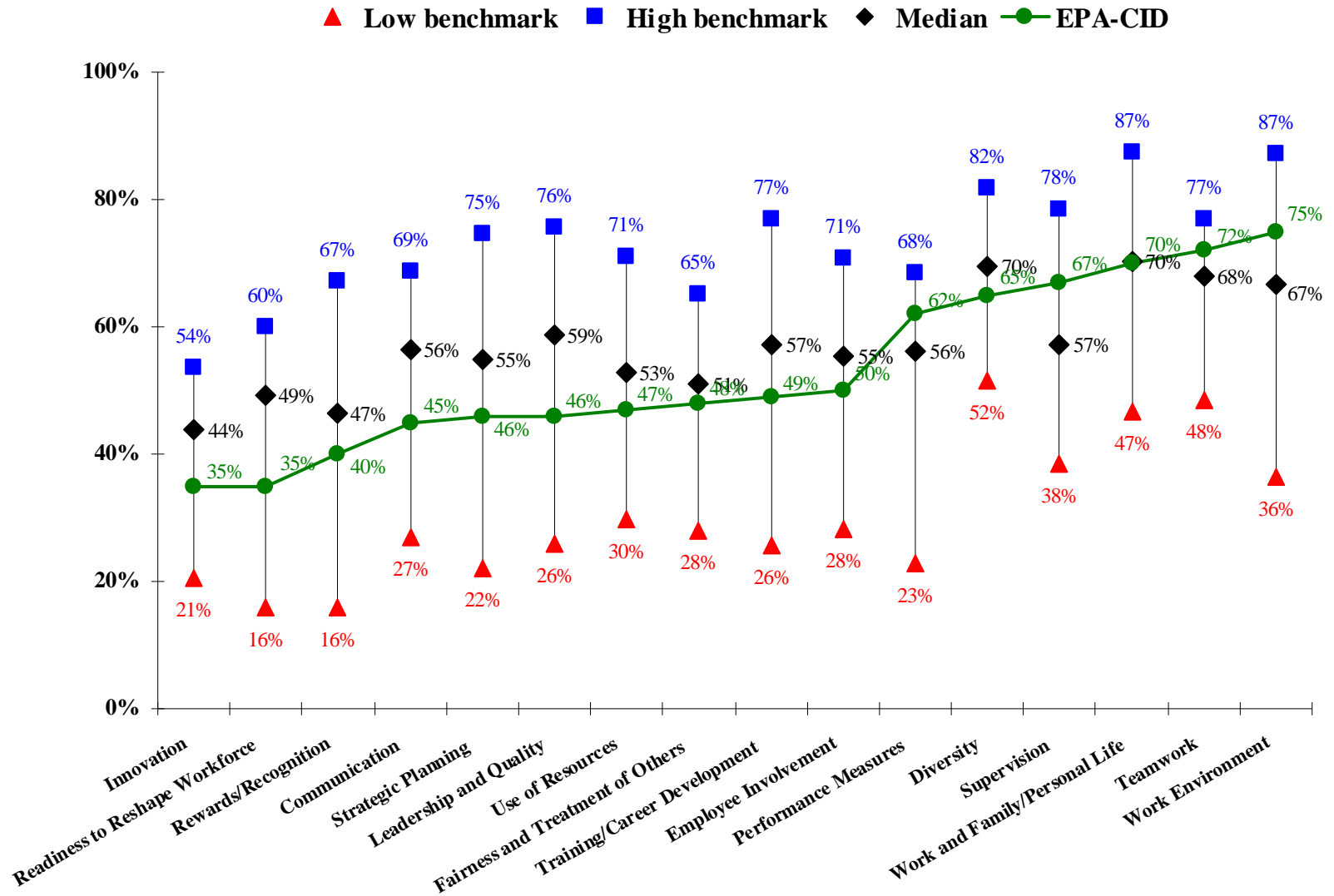


16 OAS Dimensions



■ Favorable
■ Neutral
■ Unfavorable

Performance America Benchmarks



Key Outcome Measures

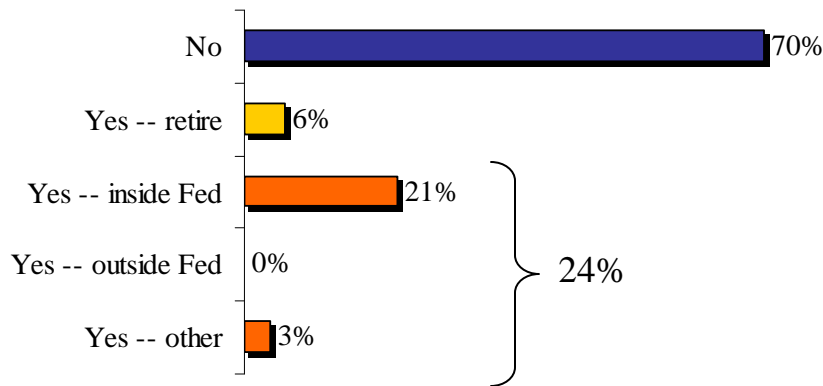
105. Considering everything, how satisfied are you with your job?



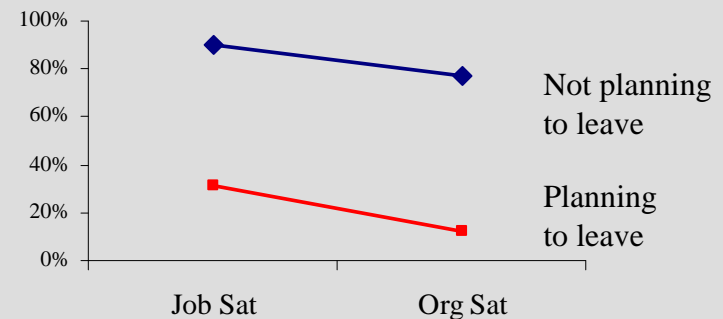
106. Considering everything, how would you rate your overall satisfaction in your organization at the present time?



97. Are you considering leaving your organization?



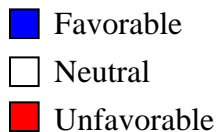
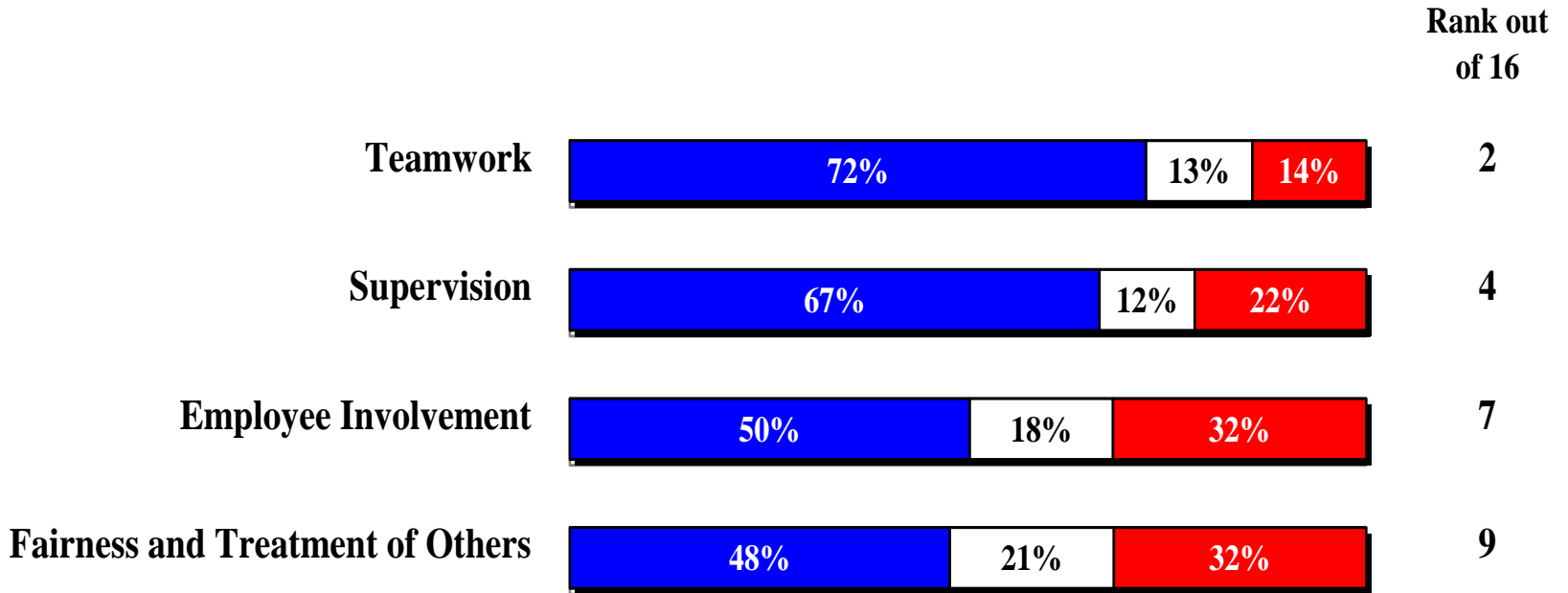
Link between Satisfaction and Turnover



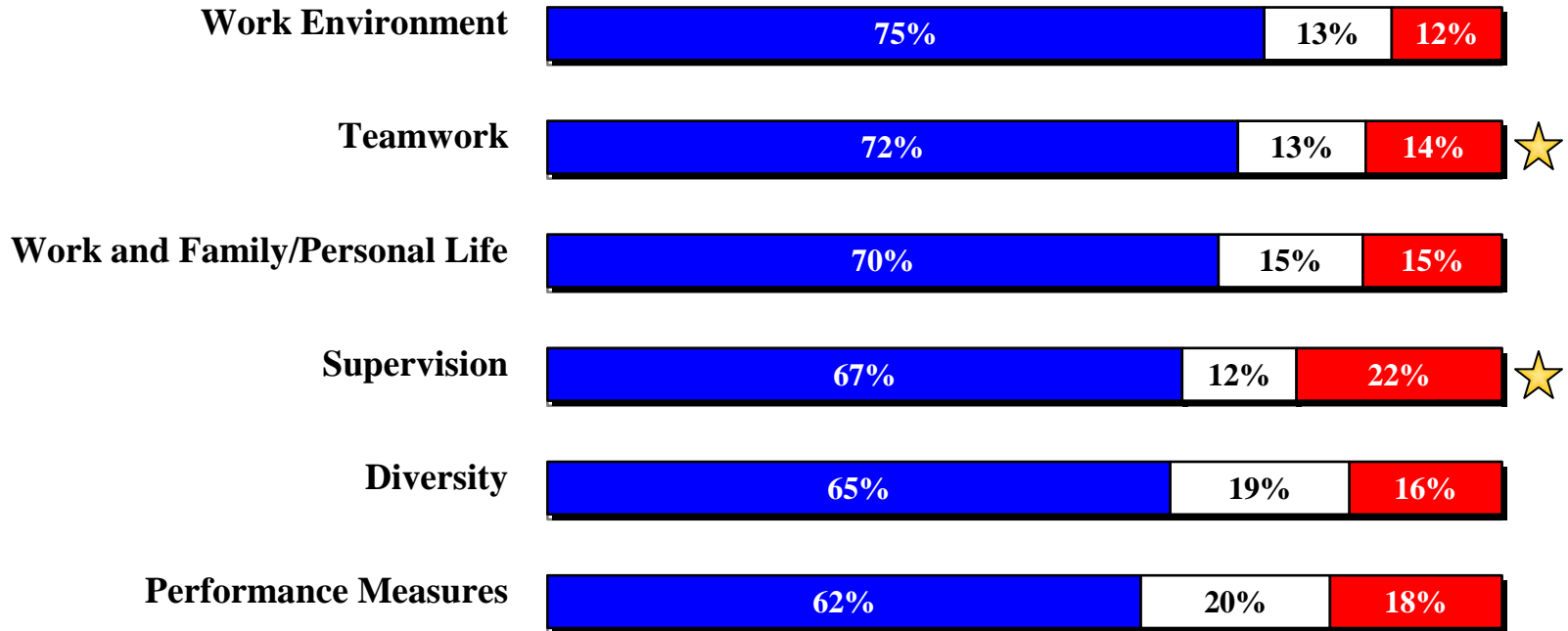
- Favorable
- Neutral
- Unfavorable

High Impact Dimensions ★

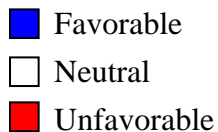
High impact dimensions are especially strong drivers of employees' job satisfaction, satisfaction with the organization, and turnover intentions.



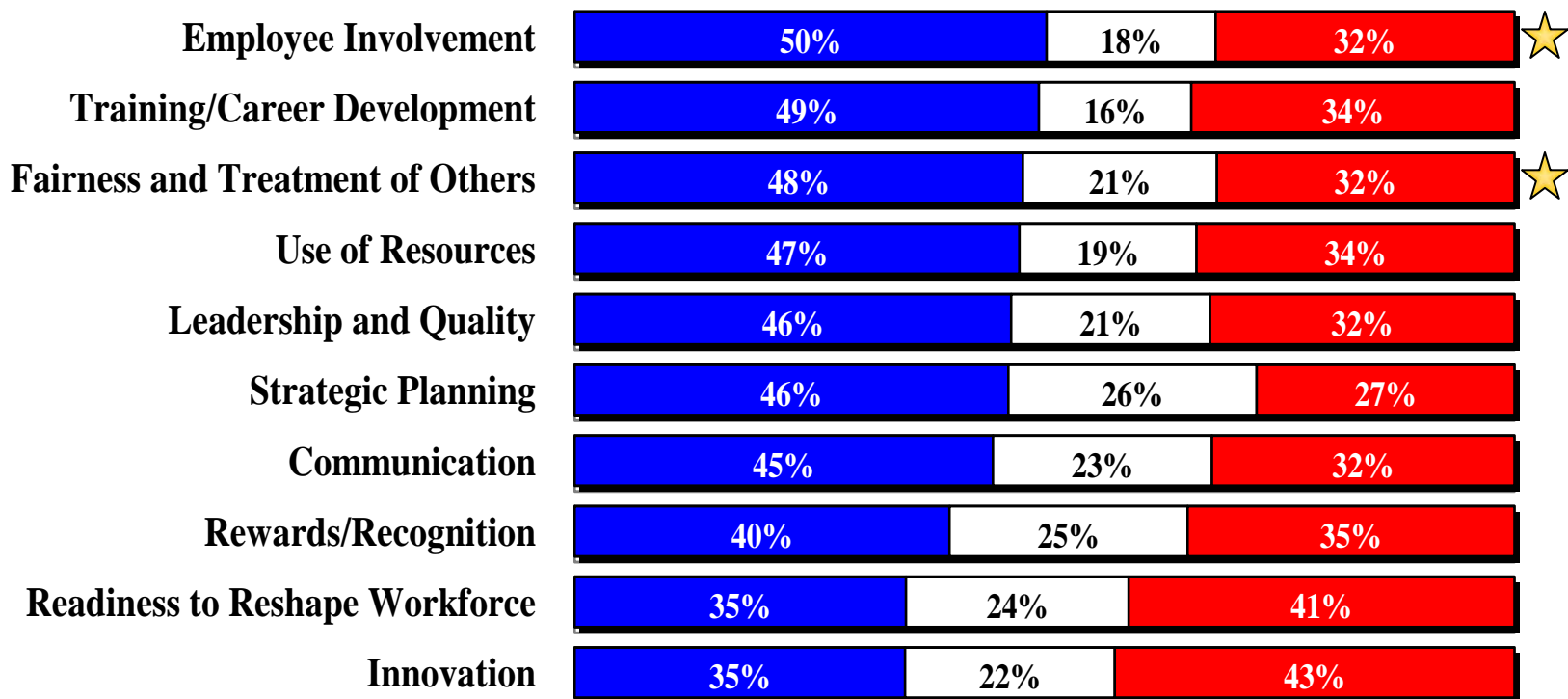
Strengths



- Top 6 dimensions in percentage favorable
- Only dimensions with fewer than 25% unfavorable
- All but Diversity at or above benchmark median



Challenges



- At or below 50% favorable
- More than 25% unfavorable
- All below benchmark medians

■ Favorable
■ Neutral
■ Unfavorable

Item Results

Teamwork ★

50. A spirit of cooperation and teamwork exists in my immediate work unit (e.g., Area Office, Operations/Investigations/Training Branch)



51. Different work units cooperate to get the job done



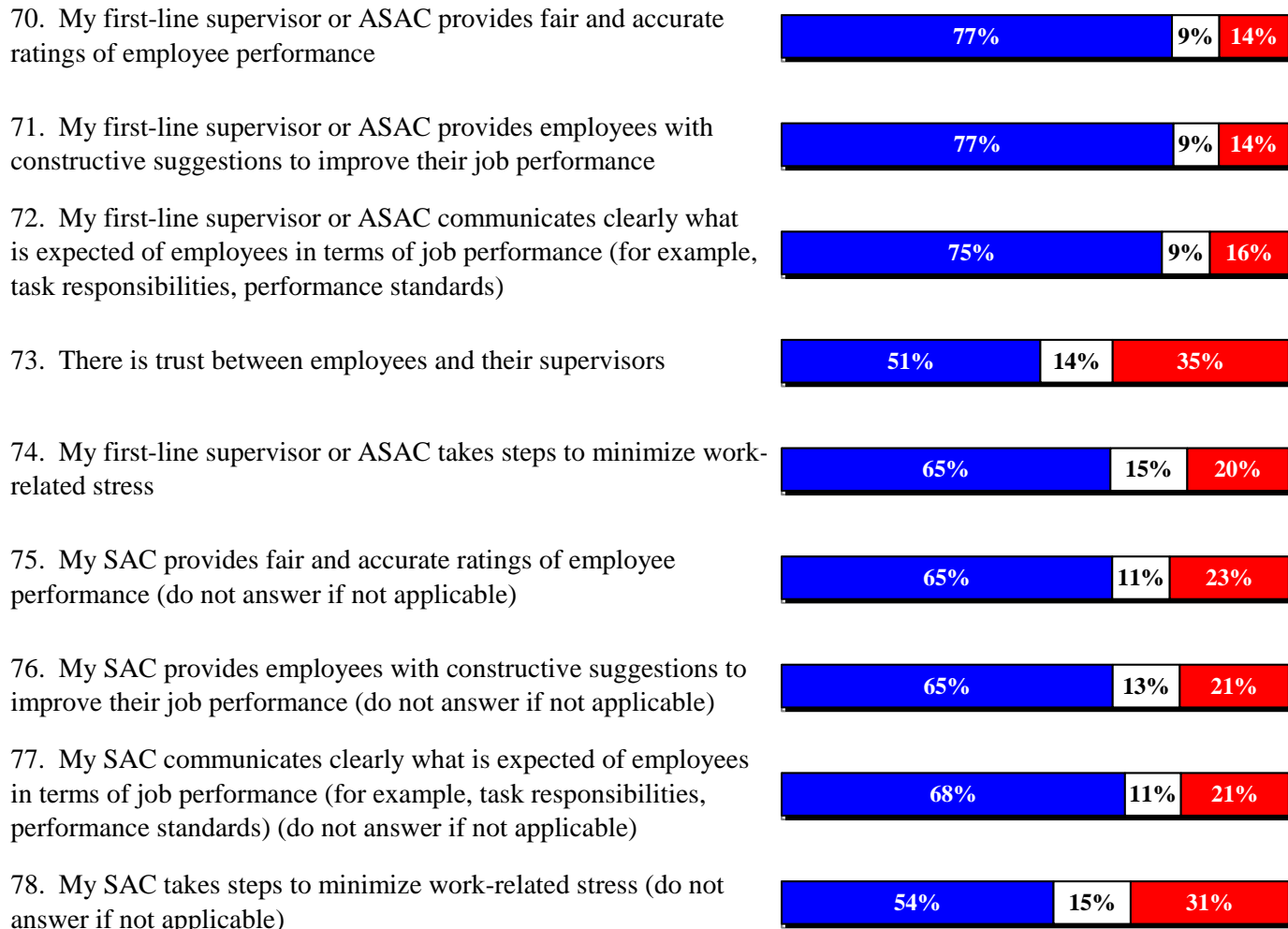
52. Employees in different work units participate in cross-functional teams to accomplish work objectives






- Favorable
- Neutral
- Unfavorable

Item Results

Supervision

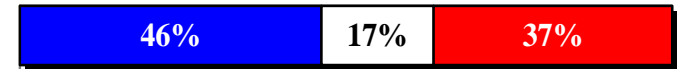


-  Favorable
-  Neutral
-  Unfavorable

Item Results

Employee Involvement ★

28. Employees have a feeling of personal empowerment and ownership of work processes






29. Supervisors provide employees with the opportunity to demonstrate their leadership skills



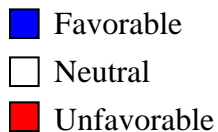
30. Headquarters managers provide an environment that supports employee involvement, contributions, and teamwork



-  Favorable
-  Neutral
-  Unfavorable

Item Results

Fairness and Treatment of Others ★



Agency-Specific Items (Operations)

107. The Operations Branch provides employees with requested items (special equipment, vehicles, IT equipment, etc.) and other support needed to perform their jobs well.



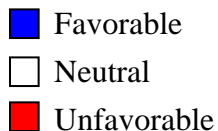
108. The Operations Branch responds to employee requests in a timely manner.



109. Employees have adequate travel funds to perform their jobs well.



110. Employees have adequate operating funds to perform their jobs well.



Agency-Specific Items (Training)

112. When I began my career with CID, I received the initial basic training I needed within the agency itself (i.e., from Environmental Investigations Basic (EIB) and/or Criminal

113. I receive the continuing field-based, in-service training I need to perform my job (firearms training, regional-based environmental media training, DOJ seminars, CID seminars, etc.).

114. I receive the advanced training I require to meet specialized needs (advanced interviewing skills, firearms instructor, computer forensics, tactics, use of force, etc.).



- Favorable
- Neutral
- Unfavorable

Agency-Specific Items (Investigative)

116. The Field Investigations Team (ASAC Investigations and Desk Officers) within the Investigations Branch responds to employee requests and questions in a timely manner.



117. My experience with the Field Investigations Team within the Investigations Branch has been positive.



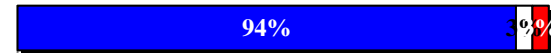
118. The INTERPOL National Central Bureau representative responds to employee requests and questions in a timely and professional manner.



119. Having an EPA CID representative at INTERPOL provides a valuable service to CID Agents.



120. The NCFL-TEC Computer Forensics Program provides valuable services to CID Agents (e.g., computer forensics and internet investigative support).



121. The NCFL-TEC Technical Surveillance Program provides valuable services to CID Agents (e.g., covert audio/video equipment, audio/video forensics, vehicle/package GPS tracking).



122. The Center for Strategic Environmental Enforcement (CSEE) responds to employee requests and questions in a timely and professional manner.



123. The CSEE will work with employees to provide them with the appropriate amount of intelligence information.



124. My experience with the CSEE has been positive.

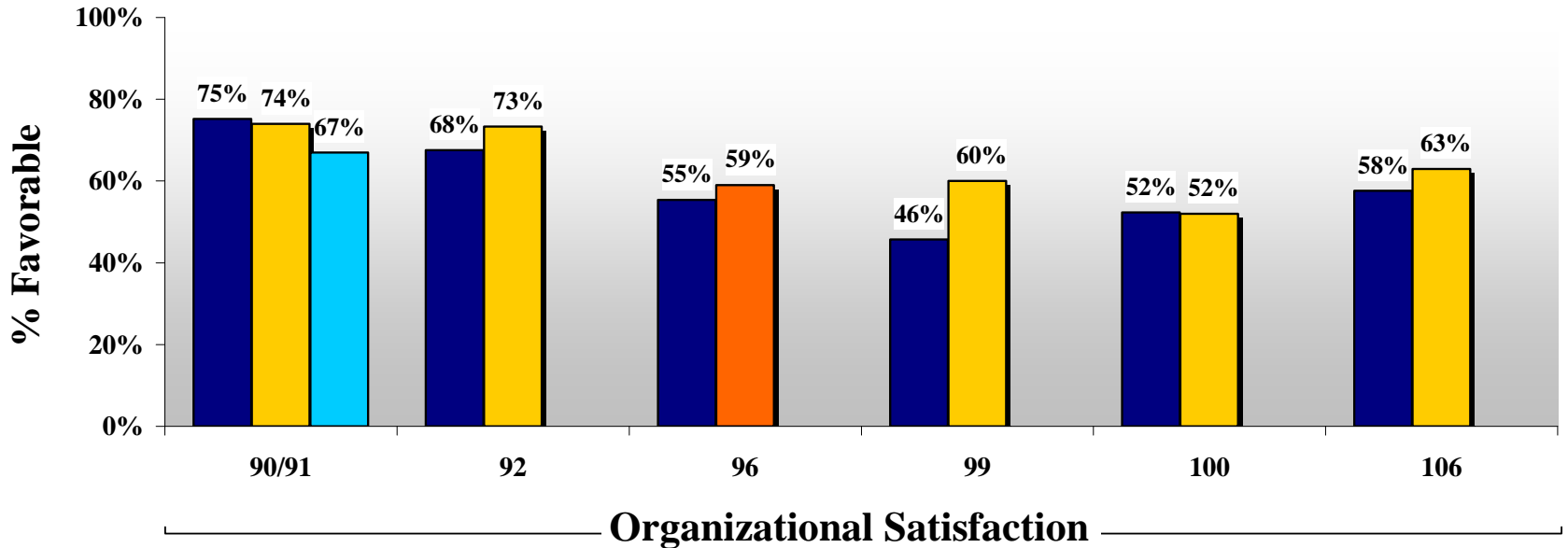


125. The CSEE ECDIP is a valuable intelligence product.



- Favorable
- Neutral
- Unfavorable

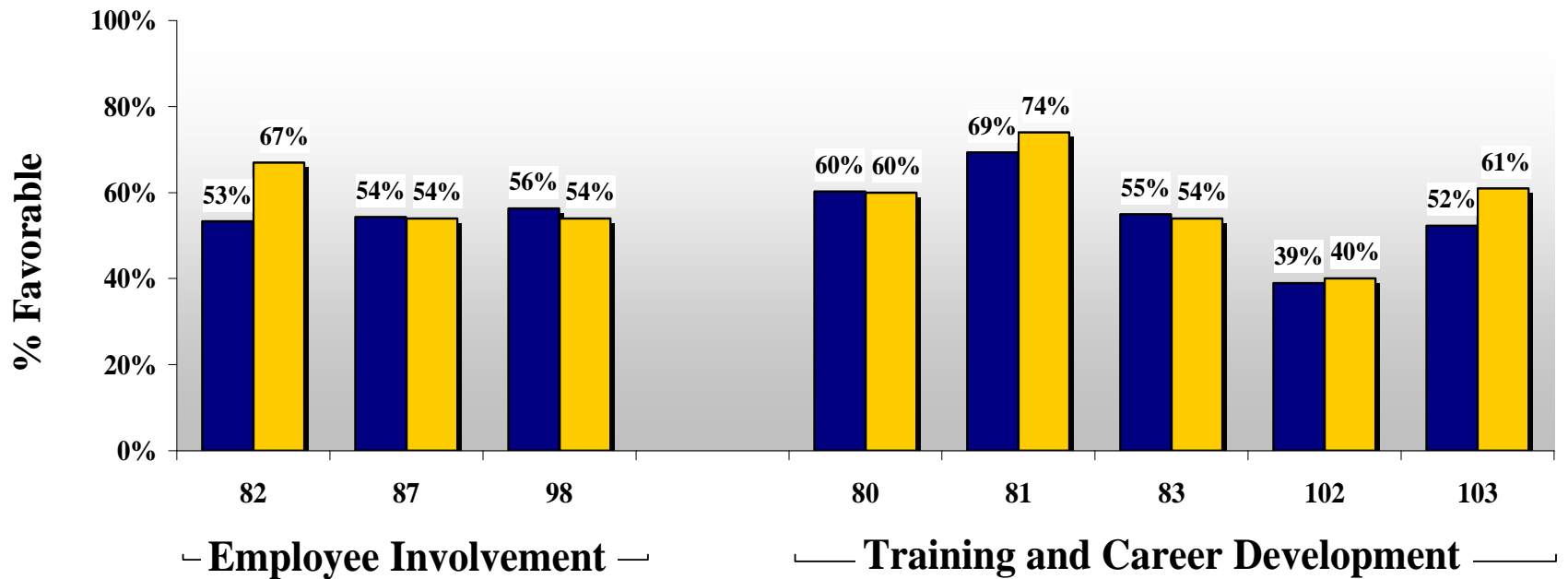
Private Industry Benchmarking



- 90. Overall, how good a job do you feel is being done by your immediate supervisor/ASAC?
- 91. Overall, how good a job do you feel is being done by your SAC?
- 92. How do you rate your organization in providing job security for people like yourself?
- 96. How would you rate the Criminal Investigation Division as a place to work compared to other organizations?
- 99. [Satisfaction with] The information you receive from management on what's going on in the organization?
- 100. [Satisfaction with] The recognition you receive for doing a good job?
- 106. Considering everything, how would you rate your overall satisfaction in your organization at the present time?

- ■ EPA-CID
- Private Sector
- Performance America

Private Industry Benchmarking

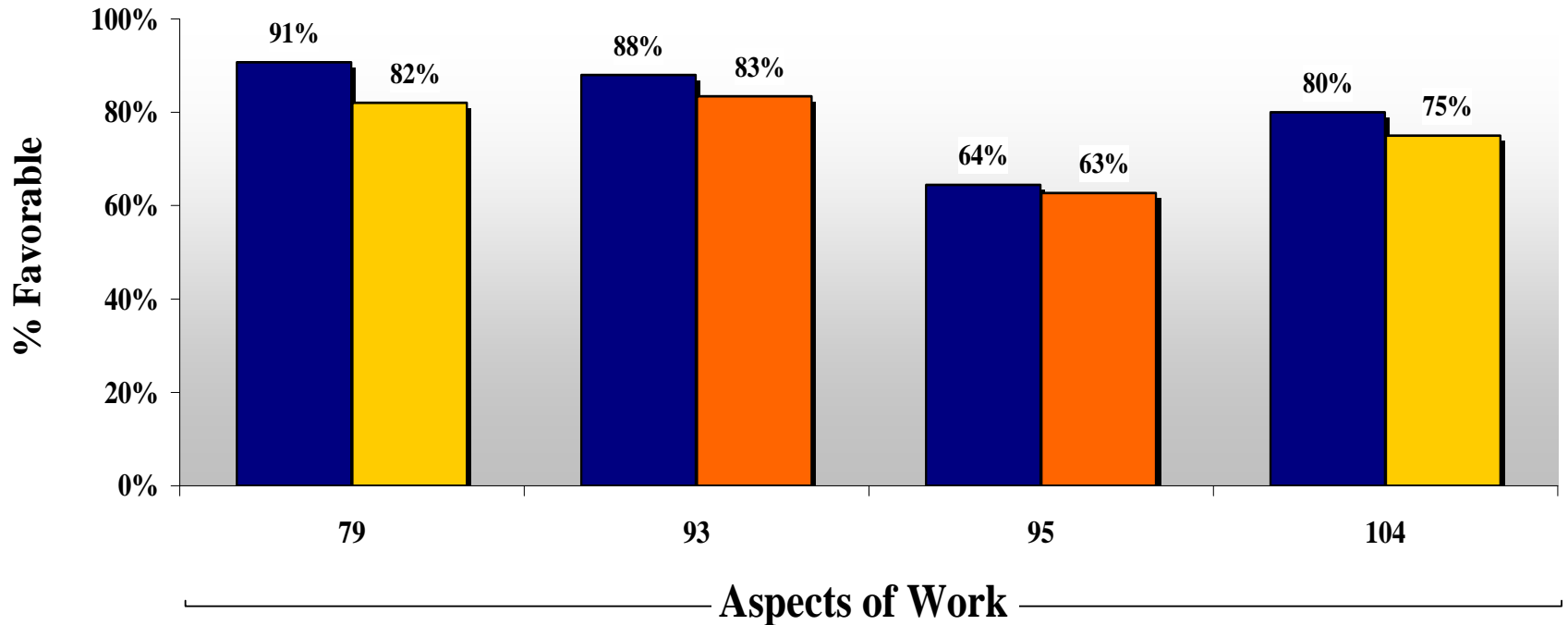


- 82. I feel encouraged to come up with new and better ways of doing things
- 87. Sufficient effort is made to get the opinions and thinking of people who work here
- 98. [Satisfaction with] Your involvement in decisions that affect your work?

- 80. I am given a real opportunity to improve my skills in my organization
- 81. I have enough information to do my job well
- 83. Conditions in my job allow me to be about as productive as I could be
- 102. [Satisfaction with] Your opportunity to get a better job in the organization?
- 103. [Satisfaction with] The training you received for your present job?

- EPA-CID
- Private Sector
- Performance America

Private Industry Benchmarking



79. The people I work with cooperate to get the job done

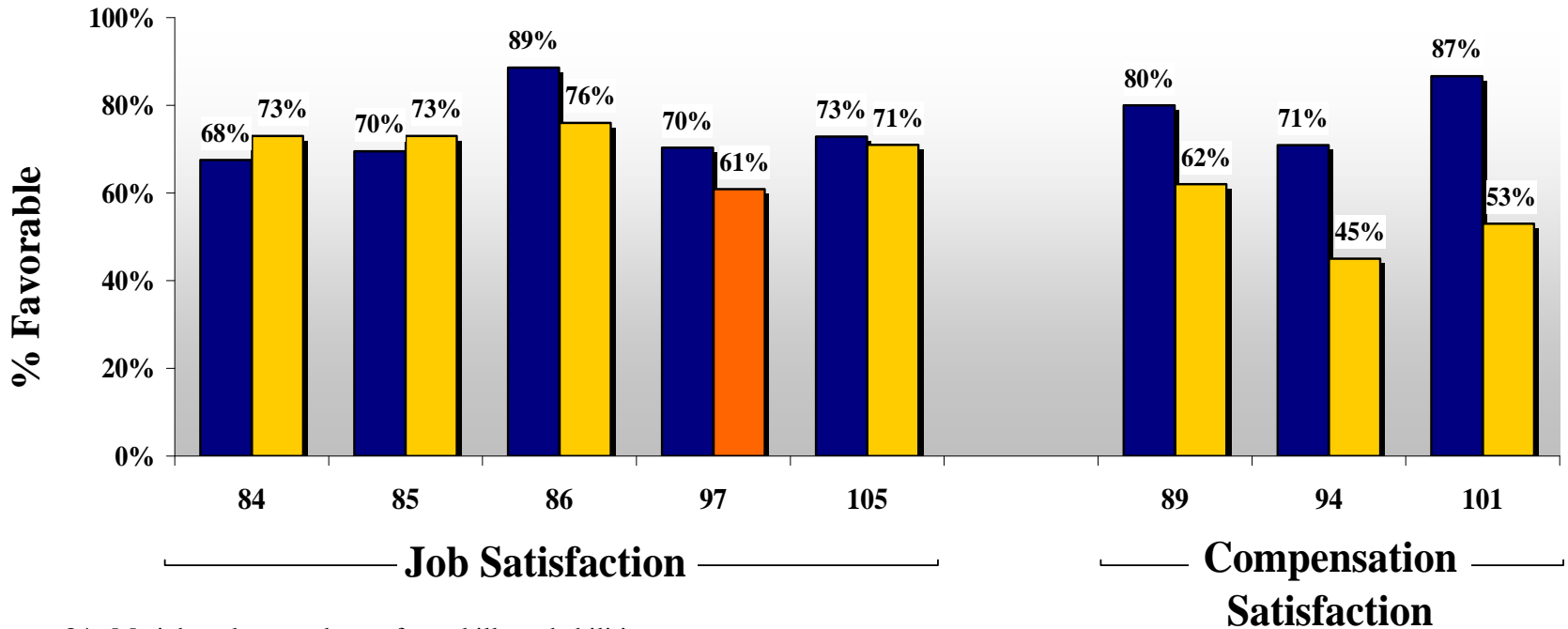
93. How would you rate the overall quality of work done in your work group?

95. The amount of work I am expected to do on my job is:

104. [Satisfaction with] Your physical working conditions?

- EPA-CID
- Private Sector
- Performance America

Private Industry Benchmarking



- 84. My job makes good use of my skills and abilities
- 85. My work gives me a feeling of personal accomplishment
- 86. I like the kind of work I do
- 97. Are you considering leaving CID?
- 105. Considering everything, how satisfied are you with your job?

- 89. How do you rate your total benefits program?
- 94. In comparison with people in similar jobs in other organizations, I feel my pay is:
- 101. [Satisfaction with] Your pay?

- EPA-CID
- Private Sector
- Performance America

Group Differences

- Small sample/group size
 - Hard to detect meaningful group differences with many small groups
- No differences for Job Category, Pay Category, Supervisory Status, Gender, Hispanic/Latino Origin
- Unclear differences for time based demographics (Federal Tenure, EPA-CID Tenure, Pay Grade, Age)

- Location differences:

Dimension	High	Low
Work Environment	Boston, Denver	Seattle
Teamwork	Boston, Seattle	Philadelphia
Supervision	Boston	Philadelphia, Dallas
Job Sat	Boston	New York, Philadelphia, Dallas

- Race differences: Strategic Planning, Performance Measures, Diversity
 - Difficult to identify specific racial groups driving differences

Overall Summary

- Employees are more satisfied with their jobs than with the organization
- There are clear strength and challenge areas
 - 5 of 16 dimensions above benchmark median
 - While 11 of 16 dimensions are below median, none approach benchmark lows
- High impact dimensions are represented in strengths and challenges

General Recommendations

- Communicate results to employees
- Form action teams to examine results in-depth
 - Comments
 - Focus Groups
- Identify and act on priorities
 - High-impact dimensions that are challenges (Employee Involvement, Fairness and Treatment of Others)
 - Communication
 - Quick/easy wins
- Resurvey in 12 months
 - Consider a short, pulse survey in 6 months



EPA-CID Organizational Assessment Survey

Results for:
EPA-CID

June 2010

**Organizational Assessment
HR Strategy & Evaluation
Leadership & Talent Management
U.S. Office of Personnel Management**





How to Use this Report

Dimension Results

- ▶ This section summarizes your organization's scores on OPM's core OAS dimensions. The report shows the percentage of respondents who chose each response option, the total number (N) of valid responses, the number of respondents who indicated they "Do Not Know" (DNK) the answer to a question, and the mean (M) and standard deviation (SD) of responses. The statistics are calculated as the N-weighted average of item scores (i.e., items that receive more responses are weighted more heavily).
- ▶ The information in this section is useful for benchmarking and for identifying broad areas of strength and opportunity.

Item Results

- ▶ This section shows detailed results for each item on the survey. The report shows the percentage of respondents who chose each response option and the total number (N) of valid responses. Where applicable, the report also shows the number of respondents who indicated they "Do Not Know" (DNK) the answer to a question, as well as the mean (M) and standard deviation (SD) of responses.
- ▶ The information in this section is useful for identifying specific strengths and targeting specific areas for improvement. For items scored on a scale, the percentages show the distribution of responses.

Interpreting the Results

- ▶ Population: 211
- ▶ Number of Surveys Completed: 151
- ▶ Response Rate: 72%
- ▶ Maximum Margin of Error: ± 4.26 percentage points

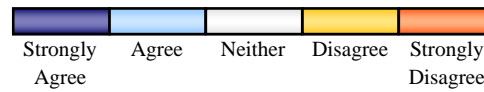


DIMENSION RESULTS

						N	Averages		
	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree		DNK	M	SD
Work Environment	27	48	13	7	5	150	1	3.85	1.04
Teamwork	25	47	13	9	5	145	6	3.78	1.08
Work and Family/Personal Life	23	47	15	8	6	139	12	3.73	1.10
Supervision	25	41	12	12	10	135	10	3.60	1.23
Diversity	23	42	19	9	7	118	33	3.65	1.14
Performance Measures	9	53	20	13	5	131	18	3.49	0.98
Employee Involvement	11	39	18	22	10	145	5	3.20	1.18
Training/Career Development	14	35	16	24	11	145	6	3.19	1.22
Fairness and Treatment of Others	11	37	21	19	13	136	15	3.14	1.18
Use of Resources	9	38	19	21	13	147	4	3.10	1.12
Leadership and Quality	12	34	21	22	10	145	5	3.16	1.15
Strategic Planning	6	40	26	19	8	124	27	3.17	1.03
Communication	8	37	23	23	9	146	5	3.11	1.12
Rewards/Recognition	8	32	25	20	14	131	19	2.99	1.16
Readiness to Reshape Workforce	7	29	24	26	15	115	36	2.86	1.17
Innovation	6	29	22	25	17	144	6	2.82	1.18



ITEM RESULTS



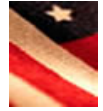
N **DNK** **M** **SD**

Leadership and Quality

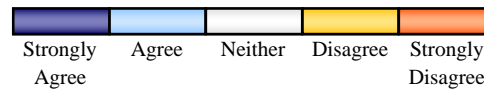
1. Headquarters managers communicate the organization's mission, vision, and values		149	1	3.60	1.05
2. Headquarters managers let employees know how their work contributes to the organization's mission and goals		149	2	3.30	1.17
3. Headquarters managers provide sufficient resources (for example, time, training, dollars) to promote improvement throughout the organization		149	2	2.92	1.25
4. Headquarters managers follow up on employee suggestions for improvements in products, services, and work processes		141	9	2.77	1.18
5. Headquarters managers set challenging and attainable performance goals		148	3	3.20	1.14
6. Employees have an understanding of the organization's mission, vision, and values		145	4	3.57	1.11
7. Quality assurance systems focus on the prevention of problems rather than on the correction of problems		135	14	2.70	1.17

Training/Career Development

8. Employees receive the training they need to perform their jobs (for example, on-the-job training, conferences, workshops)		149	2	3.31	1.16
9. Employees receive the everyday guidance and assistance they need to perform their jobs (for example, help from supervisors, team leaders, or co-workers)		151	0	3.66	1.16
10. Employees are provided with training that enhances their career advancement opportunities (for example, through cross-training, detail assignments)		146	5	3.09	1.28
11. Education and training programs are developed based on an assessment of employees' training needs		140	11	2.89	1.20
12. Supervisors support employee efforts to learn outside the job.		139	12	3.20	1.33
13. Employees are provided with training when new technologies and tools are introduced		145	6	2.96	1.21



ITEM RESULTS



N DNK M SD

Innovation

14. Risk-taking is encouraged without fear of punishment for mistakes		142	9	2.46	1.22
15. Creativity and innovation are rewarded		147	4	2.83	1.20
16. Managers and supervisors are receptive to change		145	6	2.76	1.23
17. Employees are receptive to change		143	7	3.18	1.09
18. New practices and ways of doing business are encouraged		145	5	2.84	1.16

Fairness and Treatment of Others

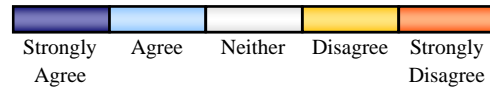
19. People treat each other with respect		151	0	3.60	1.08
20. Disciplinary actions are applied fairly to employees		119	32	2.76	1.31
21. The distribution of work among employees is fair		146	4	3.16	1.15
22. Training and career development opportunities for employees are allocated fairly (for example, job assignments)		138	13	3.17	1.16
23. Disputes or conflicts (for example, between co-workers, management and employees) are resolved fairly		125	26	2.90	1.22

Communication

24. Employees are kept informed on issues affecting their jobs		149	2	3.08	1.18
25. Headquarters managers communicate the goals and priorities of the organization		148	3	3.30	1.06
26. Headquarters managers promote communication among different work units (for example, about projects, goals, needed resources)		144	7	3.06	1.13
27. There is communication among various levels of the organization		143	7	2.99	1.12



ITEM RESULTS



N **DNK** **M** **SD**

Employee Involvement

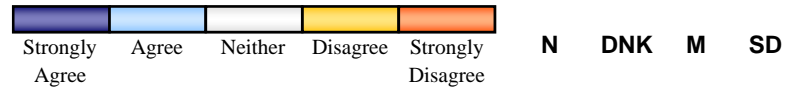
28. Employees have a feeling of personal empowerment and ownership of work processes		145	5	3.14	1.18
29. Supervisors provide employees with the opportunity to demonstrate their leadership skills		146	4	3.41	1.18
30. Headquarters managers provide an environment that supports employee involvement, contributions, and teamwork		143	7	3.04	1.17

Use of Resources

31. The amount of work is reasonable, allowing employees to provide high quality products and services		149	2	3.37	1.12
32. The workforce has the job-relevant knowledge and skills necessary to accomplish organizational goals		146	4	3.75	0.88
33. "Red tape" and unnecessary rules/regulations do not interfere with the completion of work in a timely manner		147	4	2.50	1.18
34. Employees have the appropriate supplies, materials, and equipment to perform their jobs well		151	0	3.13	1.23
35. An effort is made to minimize the number of management levels (i.e., organizational hierarchy)		140	11	2.71	1.20



ITEM RESULTS



Rewards/Recognition

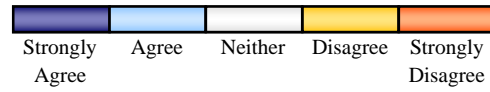
36. High performing employees receive monetary rewards (for example, cash awards, bonuses, quality step increases)	12	45	15	18	9	130	21	3.33	1.18
37. High performing employees receive non-monetary rewards (for example, plaques, letters of appreciation, public recognition)	8	35	22	25	9	130	21	3.09	1.14
38. High performing employees are promoted	5	25	34	22	15	130	21	2.84	1.11
39. Supervisors are fair in recognizing individual accomplishments	11	40	25	14	11	138	13	3.26	1.16
40. Employees are rewarded for working together in teams (for example, performance ratings, cash awards, certificates, public recognition)	6	23	28	22	20	130	21	2.73	1.20
41. Pay raises depend on how well employees perform their jobs	3	15	34	26	22	131	19	2.51	1.09
42. Cash awards depend on how well employees perform their jobs	11	38	20	16	15	131	20	3.13	1.26

Work Environment

43. Physical conditions (for example, noise level, temperature, lighting, cleanliness) allow employees to perform their jobs well	28	48	13	5	6	151	0	3.89	1.06
44. Programs that encourage good health practices are supported (for example, fitness centers, health education programs)	24	45	14	11	6	149	2	3.70	1.13
45. Employees are protected from health and safety hazards on the job	27	52	13	5	3	150	1	3.97	0.92



ITEM RESULTS



N **DNK** **M** **SD**

Work and Family/Personal Life

Item	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	N	DNK	M	SD
46. Family-related benefits are available to employees (for example, parental leave policies, child care, elder care)	23	51	12	7	7	137	14	3.76	1.09
47. Employees are given the opportunity to work at home or on flexible work schedules, when the job permits (for example, Flexitime, Alternate Work Schedule, telecommuting, part-time)	22	51	12	9	6	151	0	3.74	1.09
48. Employees who take advantage of family/personal life policies and benefits do not hurt their career opportunities	19	39	25	10	7	122	29	3.52	1.13
49. Supervisors understand and support employees' family/personal life responsibilities	29	46	13	7	5	146	5	3.86	1.08

Teamwork

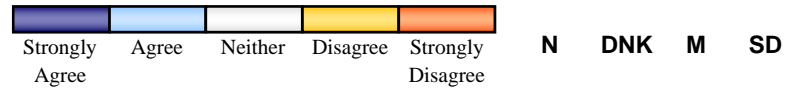
Item	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	N	DNK	M	SD
50. A spirit of cooperation and teamwork exists in my immediate work unit (e.g., Area Office, Operations/Investigations/Training Branch)	39	36	7	11	7	150	1	3.87	1.25
51. Different work units cooperate to get the job done	21	55	14	5	5	146	5	3.82	0.97
52. Employees in different work units participate in cross-functional teams to accomplish work objectives	16	50	20	11	4	138	13	3.64	1.00

Readiness to Reshape Workforce

Item	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	N	DNK	M	SD
53. There are strategies to protect job security (for example, early retirements and buyouts, workforce planning)	6	33	27	24	10	94	57	3.02	1.11
54. There is adequate advance notice of changes that affect employment (for example, downsizing, transfers, reorganizations)	9	29	27	24	12	119	32	3.00	1.17
55. Employees receive training and guidance to develop the knowledge and skills necessary to perform other jobs or to pursue new careers	5	26	19	30	21	133	18	2.62	1.20



ITEM RESULTS



Strategic Planning

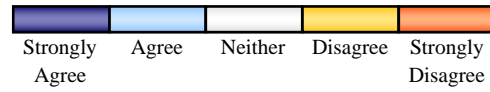
56. There is an established, formal process for developing goals and updating plans periodically		127	24	3.27	0.98
57. Employees participate in the development of strategic/operational plans		133	17	2.74	1.12
58. Performance improvement goals are established and integrated into the organization's overall strategic planning and budgeting processes		120	31	3.16	1.11
59. Managers review and evaluate the organization's progress toward meeting its goals and objectives		116	35	3.55	0.91

Performance Measures

60. Outcome/result measures are used to assess the overall performance of the organization (for example, rates, trends, and current quality levels; meeting program objectives)		124	26	3.55	0.95
61. Employees are held accountable for achieving positive results		145	4	3.66	0.92
62. Assessments of the quality of systems, work processes, and products/services are performed at regular intervals across the organization		125	24	3.23	1.09



ITEM RESULTS

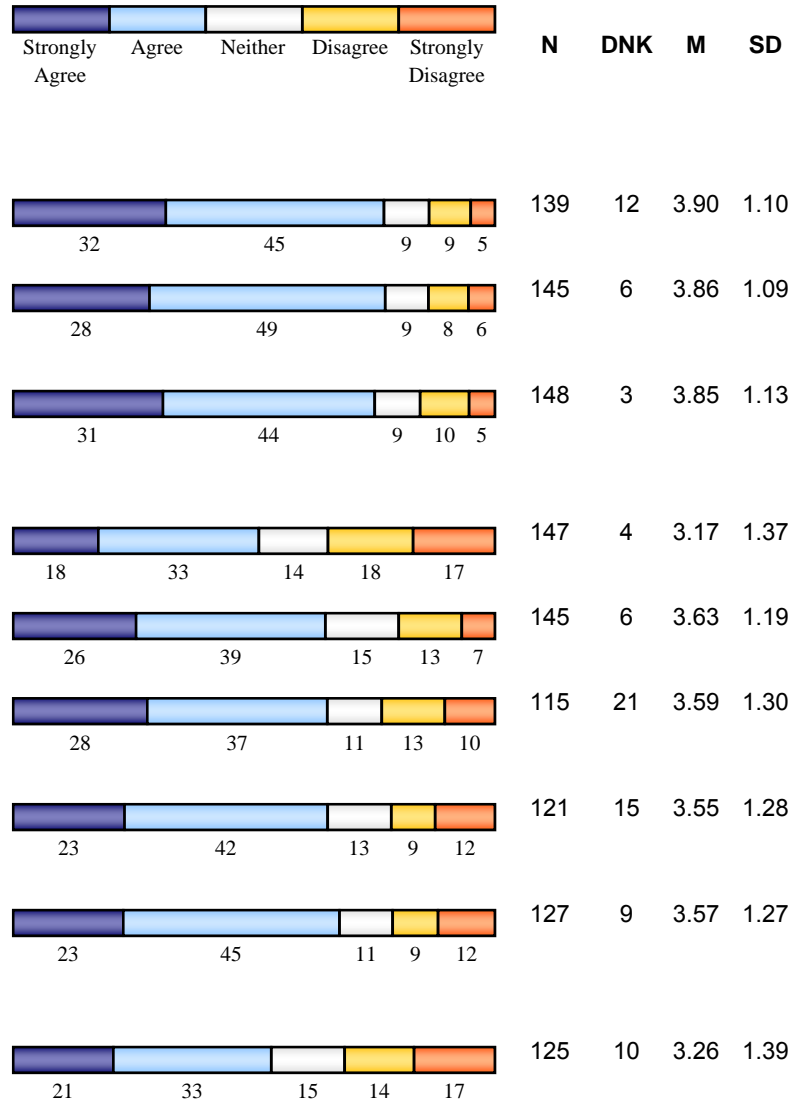


Diversity

Item Description	N	DNK	M	SD
63. Differences among individuals (for example, gender, race, national origin, religion, age, cultural background, disability) are respected and valued	142	9	3.82	1.10
64. Advancement opportunities are available for qualified individuals, regardless of gender, race, national origin, religion, age, cultural background, or disability	140	11	3.59	1.17
65. Policies and programs promote diversity in the workplace (for example, recruiting minorities and women, training in awareness of diversity issues, mentoring)	138	13	3.61	1.08
66. Reasonable accommodations are made for persons with disabilities (for example, availability of sign language interpreters, ramps, Braille)	95	56	3.59	1.03
67. Managers/supervisors deal effectively with reports of sexual harassment	84	67	3.63	1.18
68. Managers/supervisors deal effectively with reports of prejudice and discrimination	93	58	3.47	1.32
69. Managers/supervisors/team leaders work well with employees of different backgrounds	134	17	3.76	1.14



ITEM RESULTS





ITEM RESULTS

Personal Experiences

	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	N	DNK	M	SD
79. The people I work with cooperate to get the job done	39	52	5	3	1	151		4.25	0.76
80. I am given a real opportunity to improve my skills in my organization	21	40	17	19	4	151		3.54	1.13
81. I have enough information to do my job well	19	50	16	10	5	150		3.69	1.04
82. I feel encouraged to come up with new and better ways of doing things	20	33	21	17	9	150		3.38	1.24
83. Conditions in my job allow me to be about as productive as I could be	19	36	14	21	10	151		3.32	1.27
84. My job makes good use of my skills and abilities	23	44	10	15	7	151		3.61	1.21
85. My work gives me a feeling of personal accomplishment	30	40	14	11	6	151		3.77	1.16
86. I like the kind of work I do	44	44	5	3	3	149		4.23	0.94
87. Sufficient effort is made to get the opinions and thinking of people who work here	15	40	13	21	11	151		3.25	1.26
88. This organization is making the changes necessary to compete effectively	15	30	26	19	10	151		3.22	1.20
	Very Good	Good	Fair	Poor	Very Poor	N	DNK	M	SD
89. How do you rate your total benefits program?	37	43	15	4	1	150		4.12	0.86
90. Overall, how good a job do you feel is being done by your immediate supervisor/ASAC?	40	35	14	7	4	149		4.01	1.09
91. Overall, how good a job do you feel is being done by your SAC? (do not answer if not applicable)	34	33	14	9	10	129		3.73	1.29
92. How do you rate your organization in providing job security for people like yourself?	30	37	21	5	6	151		3.81	1.11
93. How would you rate the overall quality of work done in your work group?	49	39	11	1	1	150		4.35	0.72

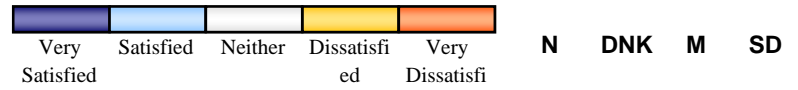


ITEM RESULTS

					N	DNK	M	SD
94. In comparison with people in similar jobs in other organizations, I feel my pay is:			6	12	71		9	1
					148		3.12	0.71
95. The amount of work I am expected to do on my job is:			6	28	64			2
					149		3.38	0.63
96. How would you rate the Criminal Investigation Division as a place to work compared to other organizations?			20	36	27		11	6
					148		3.51	1.12
97. Are you considering leaving CID?					N			
No	70%				102			
Yes, to retire	6%				8			
Yes, to take another job in the Federal Government	21%				30			
Yes, to take another job outside the Federal Government	0%				0			
Yes, other	3%				5			



ITEM RESULTS

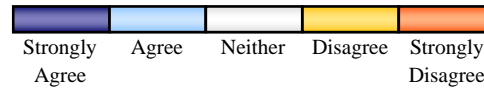


Job Satisfaction

Item	Very Satisfied	Satisfied	Neither	Dissatisfied	Very Dissatisfied	N	DNK	M	SD
98. [Satisfaction with] Your involvement in decisions that affect your work?	17	40	21	16	7	151		3.44	1.14
99. [Satisfaction with] The information you receive from management on what's going on in the organization?	8	38	19	26	9	151		3.10	1.14
100. [Satisfaction with] The recognition you receive for doing a good job?	15	37	21	19	7	151		3.34	1.17
101. [Satisfaction with] Your pay?	31	55	9	3	1	150		4.13	0.77
102. [Satisfaction with] Your opportunity to get a better job in the organization?	13	26	37	12	12	149		3.16	1.17
103. [Satisfaction with] The training you received for your present job?	15	38	22	21	5	151		3.36	1.11
104. [Satisfaction with] Your physical working conditions?	33	47	7	8	5	150		3.96	1.07
105. Considering everything, how satisfied are you with your job?	32	41	13	11	3	151		3.87	1.09
106. Considering everything, how would you rate your overall satisfaction in your organization at the present time?	21	36	16	21	6	151		3.46	1.20



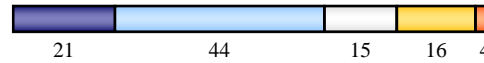
ITEM RESULTS



N **DNK** **M** **SD**

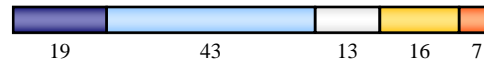
Agency Specific Items - Operations Branch

107. The Operations Branch provides employees with requested items (special equipment, vehicles, IT equipment, etc.) and other support needed to perform their jobs well.



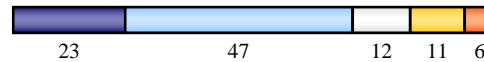
147 4 3.61 1.11

108. The Operations Branch responds to employee requests in a timely manner.



134 17 3.51 1.19

109. Employees have adequate travel funds to perform their jobs well.



142 8 3.70 1.14

110. Employees have adequate operating funds to perform their jobs well.



142 8 3.42 1.20

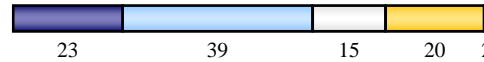
Agency Specific Items - Training Branch

112. When I began my career with CID, I received the initial basic training I needed within the agency itself (i.e., from Environmental Investigations Basic (EIB) and/or Criminal Investigator Training Program (CITP)).



133 15 4.11 1.05

113. I receive the continuing field-based, in-service training I need to perform my job (firearms training, regional-based environmental media training, DOJ seminars, CID seminars, etc.).

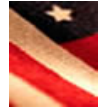


132 16 3.60 1.12

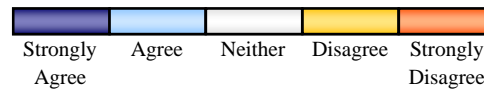
114. I receive the advanced training I require to meet specialized needs (advanced interviewing skills, firearms instructor, computer forensics, tactics, use of force, etc.).



128 20 3.47 1.20



ITEM RESULTS



N **DNK** **M** **SD**

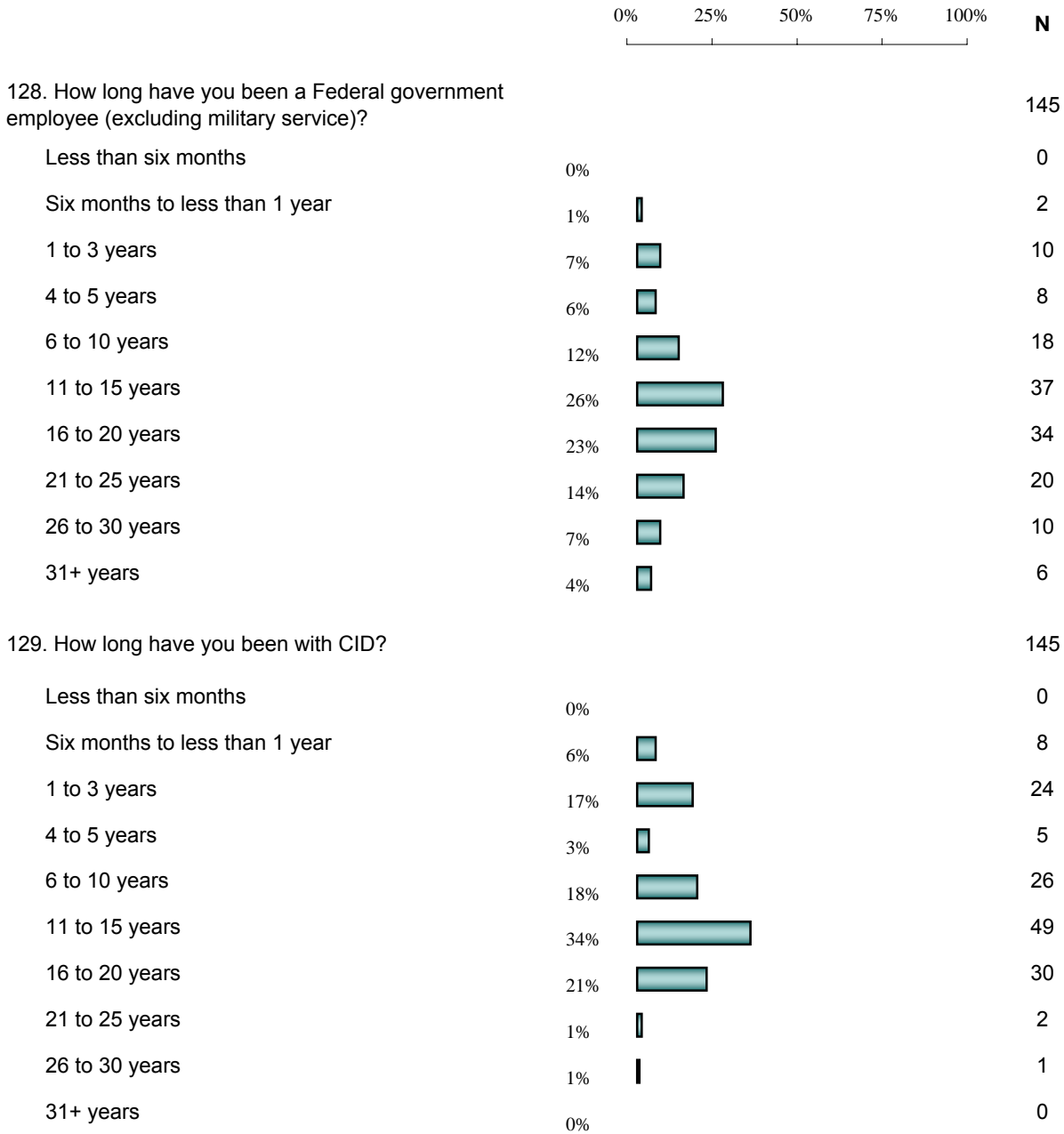
Agency Specific Items - Investigations Branch

Item Description	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree	N	DNK	M	SD
116. The Field Investigations Team (ASAC Investigations and Desk Officers) within the Investigations Branch responds to employee requests and questions in a timely manner.	24	49	18	6	3	103	45	3.85	0.95
117. My experience with the Field Investigations Team within the Investigations Branch has been positive.	25	45	19	6	5	113	35	3.78	1.06
118. The INTERPOL National Central Bureau representative responds to employee requests and questions in a timely and professional manner.	20	34	34	11	1	71	78	3.59	0.98
119. Having an EPA CID representative at INTERPOL provides a valuable service to CID Agents.	29	27	18	21	6	101	48	3.51	1.27
120. The NCFL-TEC Computer Forensics Program provides valuable services to CID Agents (e.g., computer forensics and internet investigative support).	63	31	3	1	2	130	17	4.52	0.80
121. The NCFL-TEC Technical Surveillance Program provides valuable services to CID Agents (e.g., covert audio/video equipment, audio/video forensics, vehicle/package GPS tracking).	61	28	6	2	2	125	24	4.42	0.90
122. The Center for Strategic Environmental Enforcement (CSEE) responds to employee requests and questions in a timely and professional manner.	28	40	18	12	3	111	37	3.78	1.07
123. The CSEE will work with employees to provide them with the appropriate amount of intelligence information.	22	40	25	8	4	112	35	3.68	1.05
124. My experience with the CSEE has been positive.	26	42	16	10	5	118	30	3.75	1.11
125. The CSEE ECDIP is a valuable intelligence product.	20	36	21	14	9	114	33	3.45	1.21



ITEM RESULTS

Background and Employment Information



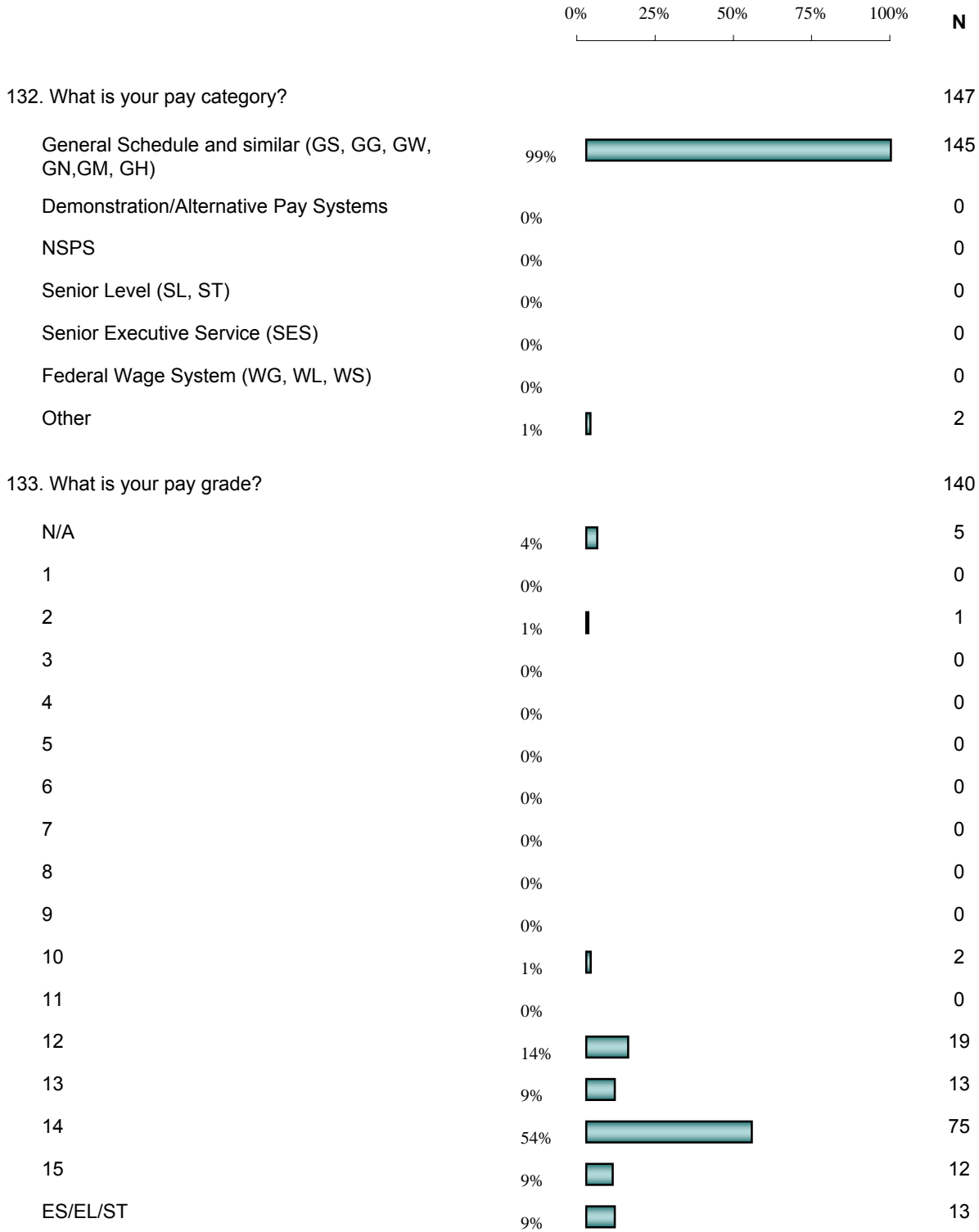


ITEM RESULTS





ITEM RESULTS





ITEM RESULTS

