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A CASE STUDY
OF
THE CLOSING OF A FEDERAL ACTIVITY

A Report Prepared for
The Office of Noise Abatement and Control (ONAC)
of
The Environmental Protection Agency (EPA)

Under

Contract 68-01-6418

by

Unified Industries Incorporated
6551 Loisdale Court
Springfield, Virginia 22150
(703) 922-9800

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39272-101

REPORT DOCUMENTATION PAGE		1. REPORT NO.	2.	3. Recipient's Accession No. EPA 550/9-82-501
4. Title and Subtitle A Case Study of the Closing of a Federal Activity			5. Report Date September 30, 1982	
7. Author(s) W. Thomas Callahan, Wilson V. Varga, et al.			6.	
9. Performing Organization Name and Address Unified Industries, Incorporated 6551 Loisdale Court, Suite 400 Springfield, VA 22150			8. Performing Organization Rept. No.	
12. Sponsoring Organization Name and Address Office of Noise Abatement and Control Environmental Protection Agency Washington, DC 20460			10. Project/Task/Work Unit No. 196101	
			11. Contract(C) or Grant(G) No. (C) 68-01-6418 (G)	
			13. Type of Report & Period Covered Final Report July 81 to September 82	
15. Supplementary Notes None			14.	
16. Abstract (Limit: 200 words) Federal activities can close without resort to reduction-in-force (RIF) procedures and avoid the costs and personnel turbulence attendant to a RIF. Phaseout, rather than precipitous closing, can also avoid loss of property and diminution of respect for the national government. This report documents in detail the steps taken by the managers of one Federal activity that conducted a gradual phaseout. Emphasis is placed on personnel outplacement, the bolstering of state programs to carry on the Federal work that is ending, retirement of program records and technical information, fulfillment of regulatory requirements, disposition and security of property, and assurance of fiscal accountability. Discussions are illustrated with specimens of documents that can be adapted for use by other activities that close.				
17. Document Analysis a. Descriptors				
b. Identifiers/Open-Ended Terms Staff outplacement Procedures for closing a Federal Program Program management				
c. COSATI Field/Group NA				
18. Availability Statement: Release unlimited			19. Security Class (This Report) Unclassified	21. No. of Pages 132
			20. Security Class (This Page) Unclassified	22. Price

(See ANSI-Z39.18)

See instructions on Reverse

OPTIONAL FORM 272 (4-77)
(Formerly NTIS-35)
Department of Commerce

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EXECUTIVE SUMMARY

INTRODUCTION

The Office of Noise Abatement and Control (ONAC) of the Environmental Protection Agency (EPA) closed on September 30, 1982. The closing was a part of the program initiated by the Reagan Administration to reduce the size and reach of the Federal Government. The decision to phase out the program was based on an Office of Management and Budget (OMB) determination that the benefits of noise control are highly localized and that the function of noise control can be carried out adequately at the state and local level.

The closing of the Noise Office was announced in February, 1981. The program was not included in the fiscal year (FY) 1983 budget, and the FY 1982 budget was reduced to 20 percent of its previously projected level. When the phase-down decision was made, the management of EPA ordered that the closing proceed in the least disruptive manner. The initial plan for the phaseout included five elements.

- a. Reduction-in-force (RIF) procedures, resulting in layoffs of personnel and the accompanying stresses, were to be avoided if possible.
- b. The Noise Office was to complete important, but tangled regulatory matters, and to rescind certain previously issued regulations.
- c. The managers of ONAC were to transfer all appropriate resources to state and local governments whose interest in noise abatement and control would continue after the Federal program ended.
- d. Government managers were to protect all Federal real estate, furniture, equipment, and supplies from pilferage and damage and dispose of those resources in the most accountable and economic ways.

e. Managers were to end all contracts, interagency agreements, and cooperative agreements before the program ended.

To achieve all of those goals, the management of EPA rejected precipitous closing actions and decided to execute a gradual phaseout over an 18-month period.

The costs of a phased closing were considered carefully and contrasted with the costs of an immediate shutdown. Estimating the costs was problematic because within the entire Federal Government few records were available for any aspect of closing such program activities. None of the personnel who were charged with the responsibility for closing the program had any first-hand knowledge of the problems, procedures, or costs entailed in closing. Cutting through the problems of uncertainty, the managers of the noise control program realized that the cost of a phased closing could be offset by the concomitant avoidance of the following costs:

- a. cash severance payments for former Government employees;
- b. loss or disuse of institutional knowledge, equipment, furniture, real estate, and supplies that the Government had purchased in previous years;
- c. payments for extraordinary staff, from the inspector general's office, for example, who might have to clean up the disorder that a precipitous closing would create;
- d. the loss of the services of trained Federal employees who might be forced to leave the Government in the event of a rapid closing, but who could find other Federal employment if the closing was gradual; and
- e. the inestimable cost of the false impression that the Federal Government is careless with its employees and with the taxpayers' goods.

Once the decision to conduct a gradual closing had been made, EPA faced the challenge of executing it. The Assistant Administrator (AA) for Air, Noise, and Radiation delegated the task of closing to the Director of Noise Control Programs. At the same time, the AA informed the Director that the full support of the AA's office would be at ONAC's disposal during the phase-out. The Director needed that commitment, because the phaseout process was expected to include a series of unknown obstacles that the AA could help to surmount. Backed by the AA's commitment of support, the Director initiated and led a positive program to close ONAC in a dignified, orderly way.

The program for closing ONAC consisted of intensifying effort on the normal work of the Office and taking a few unusual steps. Planning, motivation, and administration were emphasized, although those functions did not differ from established procedures. Extraordinary actions were taken to deal with the essential problem of the phaseout, i.e., personnel turbulence.

The management of ONAC foresaw correctly, it turns out, that their subordinates would tend to be demoralized by the closing. Some would desire to leave quickly; others would feel compelled to stay until the closing; and still others would deny, to some degree, the reality of the decision to close. Management decided to confront such attitudes directly. The Director addressed this issue by taking the following measures:

- a. an active outplacement program;
- b. frequent meetings with staff members to encourage them to deal with the closing realistically while recognizing that the temptations of rancor, panic, and paranoia were natural, especially in light of the mood depicted in the media and in customary rumor channels;

c. elimination of several budget items, such as a major automated technical reference center, that in other years had been considered necessary; and

d. procurement of contractor services to manage the practical aspects of closing.

By maintaining careful scrutiny of progress and by securing the AA's help on several vital occasions, ONAC was able to meet all of its goals.

This report provides detailed descriptions of all aspects of the phaseout and includes exhibits of the principal documents involved in the administration of the phaseout.

While there are many tasks associated with the complete phaseout of a fairly large national program, they essentially fall into six major categories:

- a. orderly processing and archiving of office records;
- b. orderly and timely surplusing of office equipment;
- c. planning and implementing a state noise program capacity building strategy;
- d. planning and implementing an employee assistance program including outplacement, training, and retirement services;
- e. finalizing a regulatory agenda; and
- f. employing every possible procedure to maximize savings to the taxpayer.

The many tasks associated with these activities require acute sensitivity and appreciation of national and local issues, Agency priorities, official personnel procedures, employee's rights, but most importantly, a humane understanding of the psychological impact on people facing the ultimate loss of employment.

PERSONNEL MANAGEMENT/OUTPLACEMENT

Probably the single most important accomplishment associated with the phaseout of the Noise Office was the organization of a system to locate employment outside of the Office for the ONAC staff. At the time of the original announcement, there were 92 employees working in the EPA Headquarters Noise Office. During August of 1981, a truly dynamic program was designed that has succeeded, thus far, in the outplacement of over 90 percent of the Office employees. Elements of this outplacement effort included the following:

- a. job counseling with employees by senior staff experienced in personnel matters;
- b. arranging for interviews for impacted employees within EPA, with other Federal agencies, and with firms and organizations in the private sector;
- c. assisting in drafting personal marketing letters to accompany resumes and SF 171s;
- d. identifying individual training needs for highly specialized employees and approving shortterm training to broaden their job market value in the public sector;
- e. refresher training in secretarial skills, such as shorthand and operation of the latest word processing equipment;
- f. conducting interview training programs for employees who were actively seeking employment elsewhere;
- g. conducting a training program in legal terminology for secretaries to enhance their value not only to EPA but also to other Federal agencies;

- h. having management aggressively intervene with prospective employers;
- i. assisting in preparation of personal resumes for employees and preparation of effective SF 171s;
- j. personally contacting other Federal agencies that were in a hiring mode, such as the Department of the Army and the Department of the Navy, on behalf of employees actively seeking employment in those areas;
- k. personally contacting Members of Congress who assisted in gaining command level attention within the Army and Navy;
- l. conducting highly individualized retirement counseling seminars for those employees eligible for retirement which included assisting some employees who were eligible for early retirement;
- m. constant monitoring of job vacancies to track action on employees who applied for posted vacancies both within EPA and in other Federal agencies;
- n. arranging for private employment agencies to assist ONAC personnel at no cost to the individual or the government; and
- o. pursuing every other possible outplacement avenue.

In addition, another instrumental factor in the success of the outplacement effort was the establishment of a series of weekly senior staff meetings on the status of all outplacement activities. This eventually evolved into a daily staff strategy meeting between the Office Director, the Deputy Director, and the Director of Plans and Programs to stay on top of employment opportunities for the noise staff on a timely basis. As an outgrowth of these strategy sessions, high level contacts with defense agency personnel officials were made to assure employees of priority employment consideration

for remaining professional staff. Due to these untiring efforts, the goal of phasing out the program without the necessity of a formal RIF has become a reality. Additionally, the success of these efforts has resulted in a savings of over \$1,000,000 in personnel costs to the Agency.

STATE PROGRAM CAPACITY BUILDING

In October 1981, a meeting was held with representatives from 24 states that had active noise control programs. The primary focus of the meeting was the steps required of the states to preserve and enhance their programs, and the types of assistance EPA could provide during the coming year to accomplish that goal. Group discussions and meetings with individual state representatives were held to develop State strategies or action plans that would be implemented before September 30, 1982. Since October 1981, followup activities have continued with the 24 states and, in addition, onsite technical assistance has been provided to 16 additional states.

Of the 24 states represented, each requested a comprehensive and extensive supply of technical and educational EPA publications to assist them in the continuation of their noise abatement programs. In addition to the requests from the states, literally hundreds of local governments, private foundations, universities, and private citizens have requested noise related publications since hearing of ONAC's phaseout. A comprehensive plan was developed to disseminate all the available noise publications. This has resulted in placing over 320,000 publications in the hands of those that requested them, completing and distributing over 20 studies still in progress and placing approximately 90 research publications in the National Technical Information Service (NTIS) so that they will be available to noise personnel,

the research community, and the general public. A complete noise publication bibliography with abstracts was developed for future use by persons interested in acquiring EPA noise publications.

Another aspect of our priority activities to strengthen the state programs so that they could assume complete responsibility for environmental noise abatement within their jurisdictions was the decision to lend approximately \$1.5 million worth of noise measuring equipment to them for use in their programs. This equipment was housed in EPA Headquarters, in the EPA regional offices, in EPA laboratories, with state and local governments, and in various other locations. All 166 pieces of this equipment were located, inventoried, and lent to the various state governments on revocable license agreements.

All of these tasks were accomplished with great tact and efficiency and within a very tight time frame. A thorough knowledge of the process of State and local governments and a willingness to work long hours to accomplish this task led to the overwhelming success of the effort. The timely completion of this assistance to the states will most certainly enhance the long-term survivability of state noise programs.

PROCESSING AND ARCHIVING RECORDS AND PHASING OUT INTERNAL PROGRAM ACTIVITIES

As a result of the announced phaseout of the noise program, it was necessary to close the Noise Technical Reference Center (TRC), which included a computerized information system, maintained by the Office to serve EPA Headquarters, the various regional offices, state and local governments, and the public. From August 1, 1981 through September 30, 1981, the activities associated with the closing of this center took extensive amounts of time and effort. Because of the severe time constraints associated with this project,

the completion of this task was nothing short of remarkable. The activities involved in this task consisted of the following:

- a. reviewing, boxing, and archiving the regulatory support materials, final regulations, draft regulations, and identified noise sources and candidates for proposed rulemaking as well as those areas that had been studied but had not reached the identification stage, all of which were matched up with the project officer's files and shipped to the Federal Records Center (FRC);
- b. disposing of the books and periodicals that made up the technical library (some were moved to ONAC to be kept for the duration of the program before being offered to the EPA library, and others were offered immediately to the library or discarded);
- c. disposing of equipment that had been stored at the TRC (the prepared inventory had to be verified and equipment was either moved to ONAC or sent to the EPA warehouse as surplus); and
- d. disposing of furniture and any miscellaneous supplies that had been stored at the TRC.

To accomplish all these activities, a detailed plan was prepared. The first order of business was to cull and box all the material pertaining to 17 regulatory areas and then to maintain it onsite at ONAC until work was completed on the regulatory agenda. Major problems immediately became apparent in time, materials, and personnel. Each of these problems was solved with great diplomacy, judgment, and perspective while under tight time constraints.

For a significant portion of this material, a new EPA filing category was negotiated with the National Archives and seen through the EPA final

clearance (red border) process. Over 600 boxes of material preserved from operation of the noise program over a 10-year period have been expeditiously archived. Additionally, an on-line computer data management system was ensured for the 100,000 plus documents and was made available for future users of this material. The success of this effort has resulted in an annual savings of over \$220,000 to the Agency.

OPERATING ECONOMIES RESULTING IN SUBSTANTIAL SAVINGS

As the phaseout effort began, there were over 1,000 pieces of furniture and equipment located in the Office for use by the full complement of 92 people. A computerized inventory system was established to track every item and ensure that it was expeditiously and systematically surplusd so that it could be used by other Agency personnel as it became available. The overall savings as a result of these efficient and timely actions amounted to well over \$250,000 to the Agency.

Another office management cost savings program introduced during this period was the establishment of a centralized system to control the purchase and distribution of consummable supplies. As a first step, all existing office supplies were consolidated in one location and placed under the responsibility of a single individual. As a second step, a centralized purchasing program was established to control expenditure outlays for all consummable items. These supply control measures combined with an aggressive cost reduction program resulted in an immediate increase in efficiency of use as well as a realization of significant savings to the Agency.

Finally, another significant administrative improvement was the development and implementation of a new computerized system for tracking ONAC-wide financial expenditures. The system was adapted to existing word processing

and computer capabilities and served as a direct audit and tracking system for all of ONAC's financial expenditures. To ensure the success of this new financial system, a training program to facilitate the introduction and operation of the system for all working level personnel in the office was implemented. Special sessions were held with the senior staff to explain and obtain their support in implementing the program. This approach provided a smooth transition to the new financial management system and provided a basic support to the new system through training before implementation. The success of this system reduced professional staff time devoted to financial planning by 30 percent while at the same time it improved the accuracy of financial management records. As key employees left the program, the remaining staff members were able to assume responsibility for the financial system. This improved financial system significantly aided in the closing out or termination of over 170 contracts by the Office, as a part of the overall phaseout effort, resulting in a savings of approximately \$270,000 to the taxpayer.

In summary, ONAC's experience showed that it is possible to phase out a Federal activity in a cost-effective manner without the cost and disruption that attends a precipitous closing. The results of a sustained effort, supported throughout by the Administrator of EPA, were protection of taxpayers' property and interests, government retention of valuable employees' skills, an orderly shift of noise control resources to state and local governments, and significant cost savings. The experience also showed again that Federal employees, given adequate leadership and support, will work to effect a major change in the direction of Government, even if that change makes their career status more uncertain.

SECTION 1. INTRODUCTION

In early February 1981, the Acting Administrator of the Environmental Protection Agency (EPA) announced that the Office of Noise Abatement and Control (ONAC) would not be included in the fiscal year (FY) 1983 budget. The budget for FY 1982 would be reduced to 20 percent of its anticipated levels. Activities planned for the remainder of FY 1981 would be cut to the lowest possible level. The Assistant Administrator for Air, Noise, and Radiation and the Office Director for Noise Control Programs began immediately to implement the orders.

From a number of perspectives, the order to close a Federal activity presented a difficult challenge to the Federal employees who were charged with executing it. Besides facing the obvious necessity for seeking new employment, the managers and staff of ONAC confronted the prospect of partially undoing the work they had done since 1973. Furthermore, few of them had experience in phasing out an entire Federal activity. None of them knew the procedures that should be followed to ensure that the closure protected the interests of the Government in accountability and in integrity of policy. The legal constraints of ending a program established by law (The Quiet Communities Act of 1978, as amended) were unknown, but the ONAC employees knew that they would have to exercise caution as well as dispatch in their actions to close the office.

The process was also complicated because the Administration acknowledged the need for noise control, but had decided to end Federal responsibility for it. The decision was based on a "...determination that the benefits of noise control are highly localized and that the function of noise control can be carried out adequately at the state and local level without the presence of

a Federal program." This decision meant that the ONAC staff had to be working to support the growth of state noise control programs at the same time that they were reducing all other activity.

The Administration of President Ronald Reagan has challenged Federal executives in ways that are, to many, unprecedented. Most unusual are the decisions that require the dismantling of Federal programs. This paper describes how EPA implemented the decision to curtail ONAC; furthermore, this paper discusses the efforts that EPA made to deal with legal requirements, with the dislocation of its staff, with the continuing demands of the public, and with the taxpayers' interest in salvaging the results of the noise control program, even though the program itself had ended.

The unusual nature of a closedown operation is also felt by those who support the organization that is closing. They will discover the need to act in an uncertain and stressful environment, and they will find their resources tested. This pervasive stress that affects all parties to a closedown makes effective communication more vital than it is in normal operations. Many of the lessons described in this report pinpoint the need for cooperation among previously unrelated groups and suggestions for communications that will secure the required rapport. Without full-fledged cooperation, efforts to close will falter, and the problems involved and the cost of solving them will mount very rapidly.

This report consists of a discussion of lessons learned; it is hoped that some of the lessons may be applied by other Federal managers who are charged with the retrenchment or curtailment of a program. Lessons such as these may prove most useful in the context of the major restructuring of the Government

initiated by President Reagan. Similar lessons are likely to be valuable, regardless of the political context, when a Federal agency, for purposes of efficiency, decides to end a program. To some degree, the ability to re-trench effectively is a skill required of Federal civil servants, just as the ability to conduct a safe and effective retreat is a skill demanded of military officers.

The text of this report emphasizes the general categories of work that need to be completed to close a Federal program. Information that is specific to EPA is found in the appendixes. They also include documents that are applicable to many Government organizations or are specimens of documents that others may find helpful. The documents will have to be tailored to fit the needs of each agency, but their substance should be widely transferrable.

SECTION 2. REDEFINING THE ORGANIZATION'S MISSION

INTRODUCTION

The announcement of the intention to close a Government organization raises the question of why the organization should continue at all. In some instances, it may be possible to close immediately; in others, as was the case with ONAC, statutes require that the organization maintain itself and some operations, although at a reduced level. Given the latter condition, management must analyze its functions to determine the lowest possible level of operations consistent with the law. In addition, management must define the manner of operations that will preserve the taxpayers' interest most effectively, including, to some extent, the capability for resuming operations if national policy dictates.

ORGANIZATIONAL ANALYSIS

General Problem

Within an organization that is closing will be elements that can shrink earlier or more rapidly than others. Management must analyze the significance of each subelement to determine its importance to the phaseout effort and identify a logical time for its elimination. From those decisions can emerge a comprehensive schedule for reducing the size of the organization.

ONAC's Experience

Appendix A shows ONAC's organization when the notice to begin the phaseout was received. The Office Director requested that the senior staff members write recommendations concerning the priorities of the Office during the phaseout. After discussing those recommendations with the managers, the Office Director made several decisions. The Technology and Federal Programs Division and the Health Effects Staff could be reduced fastest,

for their missions had secondary importance within the context created by the impending closure. The State and Local Programs Division would be charged with transferring all Federal noise control resources to state and local governments. The Standards and Regulations Division would remain until certain regulations, already issued or in the pipeline, were rescinded and a pending railroad regulation was completed. The Plans and Programs Staff and the Office Director would continue until all aspects of the orderly phaseout were completed.

All elements of the office were to encourage all employees to find new jobs to avoid the cost and hardship of a formal reduction in force (RIF). At the Office Director's orders, an active outplacement program was instituted. The success of the outplacement activity was a goal to be shared by all of ONAC's managers. Specific targets for staff reductions were to be met by certain dates throughout fiscal year (FY) 82. With those general statements, the course of ONAC and each of its elements through FY 82 was clear. A detailed description of the plans for the organizations' responsibilities can be found in appendix B.

FULFILLING MINIMUM LEGAL REQUIREMENTS

General Problem

The legal implications of closing a Federal office, established by legislation, may be unclear at the time when an order to phaseout is received. The management of the office to be closed must consult with higher authority and with legal counsel to determine the limits of the options available to management in accomplishing the closure. Management must also recognize the relevance of regulations, especially those governing personnel matters, to the shutdown process. Resort to legal advice must not be a dilatory tactic.

The goal must always be to close as quickly as possible. Interpretations of laws and regulations are necessary only to avoid difficulties that could delay the closing.

ONAC's Experience

The principal difficulty faced by ONAC was aspects of its regulatory authority under the Quiet Communities Act. When the decision to close the Office was made, EPA was involved in two complex regulatory processes, one involving railroads and one involving buses. In addition, because of policy decisions, the Agency desired to rescind as many noise regulations as would be reasonable and consistent with economic and environmental concerns. After consulting with EPA's Office of General Counsel (OGC), ONAC's management recommended finishing the work on the bus and railroad regulations, leaving four regulations in place and ending eight regulations. That plan was approved by the Assistant Administrator for Air, Noise, and Radiation. Its specifics are included in Appendix B.

FULFILLING POLICY REQUIREMENTS

General Problem

In addition to the requirements established by law, current policy will compose a major portion of the closing office's mission. For example, it is the intent of the Reagan Administration to eliminate all Federal action that is deemed unnecessary or inappropriate and to reduce the size of Federal programs that are regarded as too large. Neither of these intentions reflects, necessarily, a lack of concern for the problems that spurred the founding of the Federal programs that are to be cut. The Administration may wish to shift authority to another Federal agency, to a private institution,

or to a state or local government. If policy dictates such a shift, the managers of the closing agency will have important, and perhaps extensive, responsibilities beyond the requisites of the law.

ONAC's Experience

The management and staff of ONAC were committed to assuring the success of the Administration's attempt to turn responsibility for environmental noise control over to state and local governments. That transfer required ONAC staff members to adapt their work orientation and style more closely to the needs of the state governments, which would be the primary agents of the changeover. Instead of fitting their work to the schedule of the Federal executive and legislative branches, the staff had to consider the calendars of the states' governors and legislatures.

FULFILLING PROFESSIONAL REQUIREMENTS

General Problem

Management cannot interpret a notice to close as a license to abdicate responsibility. Government managers must ensure that their last efforts result in an orderly closing of their offices. They must always treat their fellow workers and the public with dignity, and they must continue to safeguard the taxpayers' property. At the same time, managers must recognize that the personal pressures engendered by a closeout notice will create situations that will require unusual care and ingenuity. The closedown, like all of the previous activities of the office, must be seen as an opportunity to develop employees and to reflect credit on the executive branch and the Federal structure.

ONAC's Experience

The managers of ONAC emphasized immediate action to begin all aspects of the phaseout. They drew up plans for a gradual reduction in personnel strength that would avoid a formal RIF. They demonstrated their seriousness by initiating the execution of the phaseout plan well over a year before the Office was scheduled to close. An active outplacement program commenced. All staff members were encouraged to seek new jobs, and all recognized the necessity for flexibility in adapting to the shifting work demands that would arise when an employee would leave.

SECTION 3. ASSISTANCE PROVIDED TO THE STATES

General Problems

The cessation of Federal activity in any area of public policy does not indicate, necessarily, that national interest in the objectives of the policy has dissipated. The concerns that gave rise to the Federal program may persist, and state and local governments may continue the program within their jurisdictions. Indeed, some state and local efforts may have antedated the Federal policy. In other localities, the success of the Federal program will have created a selfsustaining local commitment to achieving the program's goals. In all cases, however, the withdrawal of direct Federal involvement will create the need for a coalition of state interests and increased state program capacity to fill the vacuum left by the Federal Government.

The Federal agency that is closing can exploit the time available to bolster the capacity of states who try to continue their programs. The Federal organization can help to consolidate earlier successes by infusing many of its resources, such as equipment and publications, into the states' programs. Federal expertise in technical and organizational matters can also be shared. Finally, the Federal activity can ensure that all necessary administrative actions have been taken to ease the transition from partial Federal funding to exclusively non-Federal funding of state programs.

ONAC's Experience

The Director of ONAC recognized the primacy of state and local jurisdictions in carrying out the practical work of noise control. The Director had previously served as the leading representative of ONAC to the states and to local governments. He knew that many states and communities, with some appropriate Federal support, had created effective noise abatement

efforts, and their number was growing each year. Based on that knowledge, he concluded that noise abatement can be achieved more effectively by state and local governments. The Director set out to reinforce those earlier gains and to use the phaseout year to dispense the Federal Government's investment in noise control, in the most effective manner, to those states that were committed to continuing the program.

Since 1979, EPA, under the Quiet Communities Act, had been making grants to state governments for initiation or expansion of states' capacity to control noise within their boundaries, and for expansion of states' capabilities to assist local governments with implementation of noise control. The grants provided for the following:

a. training of state officials who would in turn, train local government personnel to control noise in their own jurisdictions and, where possible, to assist other communities as community noise advisors (the training consisting primarily of how to identify and measure a noise problem, how to plan a noise control program, how to write and pass a noise control ordinance, and how to establish an enforcement program);

b. purchase of sound level measuring equipment that the state would lend to communities who wished to establish or bolster a noise control program;

c. onsite technical assistance to show localities how to use equipment or to deal with specific organizational or technical problems including, acoustical surveys of the community and expert testimony relating to noise problems or to proposed noise control ordinances; and

d. travel funds to support training or technical assistance visits throughout the state.

To increase the efficiency of the Federal investment, which was partially matched by state governments, the Federal Government had fostered the Each Community Helps Others (ECHO) program. The ECHO concept recognized that a community noise advisor (CNA), once identified or trained by a state noise representative, was now himself potentially valuable as a resource to other communities. The ECHO program encouraged state program managers to match communities who needed training or technical assistance with experienced CNA from other communities. The CNA would assist the requesting community. This matching process, therefore, augmented the states' direct efforts and expanded the states' total noise control expertise.

The ECHO concept was pioneered and tested by the national ECHO program, which continued through 1982. National ECHO provided for community noise advisors in each of the Federal regions, and these experienced CNA were matched with local communities who requested help in starting or strengthening a noise control program. The names of the national ECHO participants, a group with outstanding experience in local noise control, were distributed to the state noise control program directors to facilitate the states' use of their expertise. The ECHO CNA were encouraged to seek opportunities to offer help to states' program directors.

When the decision to close ONAC was made in February 1981, grants were in force with 24 state agencies in 1981 and 20 in 1982. Three other important grants also came into play during the phaseout. They had been made to the University of Maryland, Rutgers University, and the International Brotherhood of Police Officers to conduct a series of national and state seminars designed to increase the cadre of officials trained in noise control.

In addition to the grants, ONAC managed other resources that were available to the states. Sound level measuring equipment was available in the Federal regional offices for loan to the states. Other equipment was available for special projects at ONAC Headquarters. Staff members at ONAC Headquarters administered the grants and equipment programs and reinforced the training and onsite technical assistance programs. A significant supply of publications was also on hand at the headquarters.

Thus, at the time the decision to close was announced, ONAC had the following resources:

- a. equipment, located in 20 states, in the Federal regional offices, and at ONAC Headquarters;
- b. training curricula and appropriate supporting publications;
- c. personnel, consisting of a growing cadre of community noise advisors, state noise control representatives, Federal regional staff, and ONAC headquarters staff; and
- d. funds, primarily for salaries and intrastate travel, residing in grants made during fiscal year (FY) 82.

The Director determined that the proper course was to use the phaseout period to strengthen the existing state programs in the following ways:

- a. by expediting the training of community noise advisors, thereby increasing rapidly the size of the noise control cadre in each participating state;
- b. by allocating all Federally-owned noise monitoring equipment to the states that demonstrated their intention to use it for continued noise control programs;

c. by increasing technical assistance to states to help them consolidate their state organizations and procedures;

d. by distributing all available public information materials to the states; and

e. by ensuring the proper administration of all Federal equipment and of all grants.

To accomplish the goals of building the states' capacity, the Director assigned the State and Local Programs Division to conduct an analysis of states' needs, to prepare a plan for distributing Federal resources, and to execute the plan. All tasks were to be completed by August 1, 1982.

The capacity building effort was also to work within the constraints of ONAC's budget. Help could be provided only as long as ONAC retained qualified staff members. This period could not be estimated with any confidence, since all of the staff would be seeking new jobs during the phaseout. Thus, swift action was a necessity. Travel to provide onsite assistance would also be limited by ONAC's phaseout year budget. Under no reasonable scenario could ONAC afford to offer significant assistance to more than the 20 states that had grants and four other states that had active noise control programs. No new requests for assistance could be honored after June 30, 1982.

The first major action in building state capacity was a conference of state noise control programs, "Noise Control in the 80's," held in October 1981. The principal purposes of the conference were to involve the states directly in planning the transfer of Federal responsibility, to identify the states that were most likely to need Federal help, and to specify the kinds of help each state needed. The results of this conference established the infrastructure for ONAC's efforts to assist the states during the phaseout.

Representatives of 24 states participated in the conference along with members of the ONAC staff who had sustained ONAC's state and local activities under the Quiet Communities Act. Of those in attendance, 22 states submitted written program appraisals that were used as the basis for ONAC's assistance plans. Fifteen states requested onsite assistance with specific tasks. (Subsequently, three other states asked for onsite help.) Twenty-one states expressed the need for aid with training, and 19 submitted equipment requests. All of the 24 state delegations that attended the conference requested various quantities of EPA publications relating to noise control.

Using the information gathered at the conference, ONAC devised a plan and schedule for filling the states' requests. The essential elements of the plan for each state were the following:

- a. the value of the 1982 ONAC grant that would be applied to the shifting of Federal responsibility to the state noise control programs;
- b. the number of training sessions that the states would provide and an estimate of the number of trainees;
- c. the equipment, belonging to EPA, that each state had on hand compared with the equipment needed;
- d. the number of onsite visits ONAC would need to make to each state to satisfy its requirements for special assistance; and
- e. the dates by which critical aspects of assistance to the states had to be delivered to conform with the states' executive, legislative, and budget calendars.

All of the elements of the plan were displayed on a wall size matrix showing the progress of the plan's execution in all participating states. The State and Local Programs Division of ONAC used the matrix to track its

progress and to set its monthly schedules. The matrix also served as the basis for up-to-date reports on progress to the Director. The Director emphasized to the staff that the transfer of responsibility to the states would be likely to attract many questions that would need to be answered accurately and quickly, so the matrix display would require precise and constant maintenance.

The actions taken by the states with ONAC's assistance varied considerably, depending on each state's needs. In summary, however, the help accounted for the achievements described in the following three paragraphs.

Training. Over 300 communities sent some 1,100 representatives to training sponsored by the Quiet Communities Act in the first half of fiscal year (FY) 82. A vital component of this activity was the matching of 70 community noise advisors with other communities that required noise control training under the ECHO concept.

Equipment. Over \$1.5 million worth of noise control equipment purchased in previous years by the Federal Government was made available to the states. As of June 1, 1982, 34 states had received equipment. The Director recommended that equipment coowned by the states and the Federal Government be retained by the states, because it was purchased with grant funds. This related effort involved the shift of equipment from the Federal regional offices and ONAC headquarters to those states. Such equipment had not been a part of earlier grants so it was shipped under revocable license agreements. That process is described in detail on page 7-12. Through extension of grants and revocable license agreements, ONAC removed nearly the entire Federal noise control equipment inventory to state grantees, and the records retained by EPA showing Federal ownership and state custody are complete.

Technical Assistance. Twenty-six onsite visits were made to 18 states by ONAC representatives. For each state, a complete plan of action, equipment inventory, and reports of training and onsite visits were prepared.

The ONAC staff played a vital role in administering the transfer of Federal noise control resources to the states. The staff contacted each state grantee to describe the procedures to be followed as the grants came to an end. First, the grantees had to request an extension to allow the grantees to retain noise control equipment purchased under their grants. Next, the grantees had to submit an inventory of their equipment to ONAC. When the request for the extension and the inventory were approved by an ONAC project officer, the papers were sent to the EPA Grants Administration Office for final approval and processing. The Grants Office then performed the essential function of keeping a file on each grant and inventory; the file will be open and the grantee may retain the equipment as long as the grantee continues to use it for the purpose specified in the original grant.

The ONAC staff also ascertained the needs of the states for publications, some of which were technical, but most of which were brochures describing the noise control process to the general public. Over 300,000 publications were distributed to the states.

SECTION 4. FULFILLING REGULATORY RESPONSIBILITIES

General Problem

The termination of the regulatory functions of a Federal agency presents management with particularly knotty problems. Regulatory actions are inherently controversial, because they unavoidably restrict action by some citizens or entities in favor of a more general interest of society as defined in legislation and policy. The end of a regulating process breaks the pattern of Government behavior in a specific area, and thus it may disturb the activities of those who have adapted to the requirements of regulations. Individuals, commercial entities, manufacturing firms, interested associations, and state and local governments must react to the end of regulation, just as they must to regulation. The closing Federal regulatory program office has reason to expect expressions of confusion and consternation from any of those sources.

Management may also find itself with the apparent necessity for contradicting its own earlier research, judgments, and public statements. Statutes and precedent rulings may seem to require the completion of regulations after critical thresholds in the regulatory process are crossed. With such requirements prescribed by law and absorbed in the doctrine of the closing agency, management, when faced with a mandate not to regulate or to deregulate, will enter strange territory in which previous knowledge seems to justify a conclusion opposite from that it justified just months previously. Such a task will be especially difficult for personnel who worked directly on the regulatory program. They may feel useless or even hypocritical in carrying out policies that depart so markedly from their previous work.

It is unlikely that management will have the option of doing nothing. Political and policy considerations pervade the regulatory milieu, and a do-nothing approach will usually fail to resolve them. The law itself may require action. Finally, Federal inaction on announced Federal policy may threaten to do substantial harm, because as long as Federal action is pending, states may be preempted from action related to the same issue. So the closing regulatory activity has a professional imperative to clear up its matters before its demise.

The possibility exists that the Congress may relieve the agency of the responsibility for resolving regulatory problems by legislative action. Given the priorities of Congress, however, such relief may be too slow in coming, so it is most probable that the agency will have to act.

As with other activities of the closing program office, the regulatory element faces the loss of its experienced staff. The regulatory process is cautious, therefore lengthy, and departure of key staff for other employment is virtually certain to have an adverse effect on the efforts of the closing office to resolve regulatory issues. Lack of trained staff can narrow the range of regulatory options available to the agency.

ONAC's Experience

When the decision to close ONAC was made, the Director instructed the head of ONAC's Standards and Regulations Division to plan to diminish the Federal role in noise regulation to clear the way for action by state and local jurisdictions. An essential element of the plan was to be an analysis of how the diminution of ONAC's activity could proceed in a way that nevertheless fulfilled ONAC's regulatory responsibilities. It was understood that

the analysis would proceed in an atmosphere of legal uncertainty, so the assistance of the EPA Office of General Counsel was seen as a necessity.

The Director of the Standards and Regulations Division decided to develop options for dealing with the phaseout of the regulatory program. He took the following conditions as given:

a. executive interest in Federal regulation of noise had waned, and executive interest in state and local control of noise had increased;

b. legislative interest in Federal noise regulation also appeared to be declining, but no firm judgment of legislative interest could be made until Congress completed amendments to the Quiet Communities Act, an event for which there was no timetable;

c. the budget for noise regulation development permitted no additional effort to carry out earlier regulatory plans;

d. the budget for Federal noise regulation enforcement allowed only for the phaseout of the division;

e. nevertheless, the letter of the Quiet Communities Act, as amended in 1978, required EPA to complete the regulations of certain products; and

f. state and local governments were preempted by the Quiet Communities Act from regulating the noise of products for which EPA had previously issued regulations. Further, the agency's formal identification of certain products as major noise sources subject to Federal regulations had a chilling effect on state and local regulatory initiatives for these products; this meant, potentially, that inaction by ONAC could actually retard the abatement of noise in those communities that wished to improve their environmental noise situation.

The Director of the Standards and Regulations Division also knew that his colleagues who had become adroit with regulatory procedures and issues would be seeking other employment. That condition, combined with the near contradiction between current and previous policies strongly indicated the need for a simple solution that would rapidly but satisfactorily clear ONAC's regulatory calendar and open the way for state or local action.

The heart of ONAC's problem was the language of the Quiet Communities Act. That law obligates the Administrator of EPA to publish reports "identifying products (or classes of products) which in his judgment are major sources of noise...." Once such a report was published, the Administrator is required to issue proposed regulations within 18 months and final regulations within an additional six months. At the time of the decision to close ONAC, EPA had already missed the statutory deadlines for regulating several of the products identified as major noise sources, making the Administrator vulnerable to citizen suit for failure to meet the deadlines. All involved wished to reduce that vulnerability, but the method of achieving that goal was unclear.

The first option was to deidentify the products formerly cited as major noise sources, thereby removing EPA's obligation to regulate those sources for which rulemaking had not proceeded beyond the identification stage. Given such action, EPA could then withdraw the several product regulations that had been proposed.

The legal and factual basis for deidentifying was in question, especially with regard to those products for which EPA had previously made a strong argument in favor of regulation. To deidentify, EPA would have to show that the product no longer constituted a major source of noise. The

Director of the Standards and Regulations Division estimated that it would be difficult, time consuming, and costly to establish the basis for such an argument since the criteria that lead to the initial identification had not changed. In addition, the legislative history of the act suggested Congress's interest in national uniformity of treatment to avoid technical barriers to interstate sale of noise producing goods. That interest would further weaken the argument in favor of state and local assumption of regulatory authority.

A modification of this option would rely on the Administrator's discretion to set priorities for regulatory actions based on national environmental needs and available resources. Emphasizing that discretion, ONAC could then argue that although certain products may be major noise sources, present circumstances, including reduced funding of the noise control program, rendered Federal regulation inappropriate at this time. The Administrator would withdraw those reports that designated certain products as major noise sources that would be regulated by the Government. This option would leave open the possibility for regulation at some time, if appropriate.

Three other options were considered but rejected because of their impracticality. First, the Administration could seek a legislative solution, but pending bills to amend the Noise Control Act did not sufficiently free EPA of its regulatory responsibilities, and the time and content of other legislative relief was unpredictable. Second, EPA could deidentify products based on a reevaluation of their health and welfare effects, but that solution would necessitate costly and time consuming efforts to develop new health and welfare criteria and new technical data. Finally, EPA had the

option of doing nothing, but that would postpone the inevitable demand for a resolution of the issues, perhaps as a result of litigation.

All of the options considered by the Director of the Standards and Regulations Division were complicated by the pressure put on staff by litigation concerning the garbage truck regulation and a court order to issue additional railroad noise regulations. Those matters had to go forward even as decisions on the overall noise regulatory program were being made.

The Office Director reviewed the analysis of the regulatory problems and sent it through channels to the EPA Office of General Counsel (OGC). The OGC recommended that the most promising approach would be to temporarily withdraw reports that listed certain products as major noise sources. The basis for this withdrawal would be budgetary constraints and national priorities, leaving open the possibility of restoring these product identification reports at a later time. The advice of OGC was accepted by the Assistant Administrator for Air, Noise, and Radiation on December 4, 1981. The ONAC regulatory program proceeded along those lines from that date.

The Standards and Regulations Division of ONAC then had approximately nine months to write and publish regulatory notices concerning 16 products. The normal schedule followed by EPA for clearance of regulatory matters made that target impossible. Accordingly, ONAC requested a dispensation from certain formalized parts of the review cycle on the grounds the notices ONAC was preparing were essentially devoid of major environmental, technological, or economic issues. Because the dispensation was granted, ONAC was able to save significant time. Time was also saved by limiting the period for public comment on ONAC's (EPA's) proposals to the minimum required by law.

Following those procedures, ONAC was able to prepare the regulatory actions shown in Figure 4-1. The deadlines for some of the actions would not have been met without significant after-hours work by staff members who also faced a deadline for finding new jobs.

A detailed description of the outcome of the major regulatory actions is enclosed as appendix C.

<u>Regulatory Action</u>	<u>Product or Operation Affected</u>
Rescind the rule	Garbage Truck
Rescind reporting, record-keeping, and production verification testing requirements from existing regulations.	Trucks Compressors Motorcycles Hearing Protectors
Withdraw NPRM.	Rail Carrier (Boundary Line) Motorcycles (Test Provision) Special Local Conditions for Interstate Carriers, Rail and Motor Tractors and Buses
Withdraw product reports.	Lawnmowers Pavement Breakers Rock Drills Refrigeration Units Tractors Buses
Amend rule.	Interstate Motor Carriers

Figure 4-1. Status of Regulatory Actions of ONAC Standards and Regulations Division

SECTION 5. DEVELOPING COMMUNICATIONS AND PUBLIC INFORMATION STRATEGIES

INTRODUCTION

Accessibility to the public is an important characteristic of all public agencies, especially those like EPA whose missions are to initiate change and encourage innovation. Therefore, when an agency receives the order to close, it is likely to have several avenues of communication open to the public. The agency must take immediate action to use those avenues effectively. Orchestration of communication will preserve integrity of policy, increase efficiency of the closing process, avoid confusion of the public, and deter speculation on future policy decisions.

NEED FOR OPENNESS AND SIMPLICITY TOWARD THE STAFF

General Approach

When an organization receives the order to close, the senior staff member should call a meeting of all personnel to inform them of the order and to provide them with an approximate schedule for the phaseout. Time should be taken to answer all questions. No details need be revealed, for they are often misinterpreted, not remembered, or reported inaccurately. The basic message is that the organization will close and that the staff must look for new jobs immediately. The only other necessary information is that the closing will occur within the procedures and policies established to protect the rights of employees and the public. Since the procedures are often complex and probably unknown to the staff, it is best to merely say that specific provisions for closing will come under scrutiny immediately. No speculation should be offered about how the procedures will apply to the present closedown. As the process develops, management and staff will discover that the procedures are generally reasonable; however, the procedures

require that Federal employees exercise sound judgment and perseverance in effecting the closing. If those simple ideas are shared effectively, they can be repeated to anyone without jeopardizing the work remaining or the larger policy of the Administration.

ONAC's Experience

Management informed all members of the Office immediately after it received the order to close. At a meeting with the entire staff, the Office Director provided the essential information that was then available. No attempt was made to provide details, for none were known; also, the Director made it clear that the decision to close was irreversible. The Director assured the staff members that the phaseout would be orderly and would conform to Office of Personnel Management procedures.

REDUCTION IN OUTREACH ACTIVITIES

General Problem

Responses to requests for information, even if they are negative, are costly. Therefore, the closing organization should avoid stimulating additional interest in its programs. Thus, immediate action should be taken to reduce outreach activities such as printing and distribution of documents; compilation of mailing lists; and sponsorship of public service advertisements, seminars, and conferences. When external groups that support outreach activities are notified of the closure (and they should be, for the closure will disturb their patterns of operations), they will have questions about it. Furthermore, the public with whom they deal will be curious about the curtailment of activities. Therefore, simple, identical announcements of the closure should be read over the telephone and mailed to all of the

outreach offices. The staffs of those offices can repeat the announcements to all who need to know that the organization is closing.

A Federal agency may have publications that are useful at other levels of government. Those items should be distributed as long as staff and supplies are available. The standard announcement of the closure can be enclosed with each mailing of the materials. When staff members are no longer available to distribute the printed materials, volunteers should be recruited to do so. When that arrangement is no longer possible, the printed materials that are of value to state and local agencies should be transferred to them.

ONAC's Experience

The management announced a freeze on all outreach activities, pending a review of priorities in light of the intention to close. Budgets of the divisions for printing and distribution of documents were centralized at the Office Director level. Work on the development of mailing lists ceased. The Deputy Office Director was given authority to require justification for each printing or other reproduction job. The policy established for reproduction was that only the 12 copies required by the National Technical Information Service (NTIS) would be made. Exceptions were granted only when the Deputy Director, after reviewing the document and a mailing list of intended addresses, determined that production and distribution of a larger number of copies was necessary. The interagency agreement with the General Services Administration (GSA) for mailing list services was terminated, and the funds were recaptured for the ONAC budget. When the reduction of outreach activities was described to outside parties, the reduction was described as being a policy decision of the Administrator of EPA.

The distribution of materials relating to noise abatement and control had been an important effort of the Office, especially of the State and Local Programs Division. A major aspect of the distribution effort was the National Information Center for Quiet (NICQ). When ONAC received the phaseout order, management determined that it could not renew the contract that staffed NICQ. When the contract expired, the NICQ publications were moved to ONAC headquarters, and the distribution effort was staffed with volunteers. At the same time, the mission and scope of NICQ were reduced to focus on the needs of the states and localities that would be assuming the responsibility for noise abatement and control. State and local governments were also viewed as the most appropriate recipients of all materials that might remain when the office closed. A dissemination plan was developed for all ONAC publications and noise related materials.

BUDGET IMPLICATIONS

General Issue

Savings will accrue to the organization as it terminates its outreach functions. It can also terminate contracts, interagency agreements, and purchase orders and apply the funds recouped to other accounts whose needs have grown. (The procedures involved in ending such obligations and recapturing the funds are discussed in various places throughout the remainder of this report, primarily in section 8). The amount of money recovered will depend on the speed with which terminations are effected and on the size of the organization's original outreach program.

ONAC's Experience

ONAC was able to save over \$20,000 of previously obligated funds by cutting its outreach activities in fiscal year (FY) 81. The budget for outreach through the first half of FY 82 was projected at less than \$2,000.

SECTION 6. DEALING WITH THE ORGANIZATION'S EMPLOYEES

INTRODUCTION

From the outset, the managers of ONAC agreed that they faced a dilemma. The work of the organization had to be done, which meant that qualified workers had to be available. However, the most qualified workers, the ONAC employees, would be leaving the organization to avoid being unemployed when the office closed. Moreover, ONAC judged that it was in the best interest of all concerned to encourage and assist its employees with their outplacement activities.

Management concluded that the solution to the apparent personnel quandary was to execute a positive program of work accomplishment and outplacement. A staff nucleus, or rearguard, would finish ONAC's work, and the labor required for that task would be drawn as needed from detailees, reemployed annuitants, contractors, and extra hours of work by the rearguard. The approach to outplacement was to set aside the anxiety about unemployment and to focus on the vital fact that the ONAC staff members were valuable resources, trained and experienced Federal employees, and employable inside and outside the Federal Government. In that context, management's key objectives were to motivate the staff members to look for jobs, to provide them with appropriate information to facilitate their job search, to expedite the processing of personnel papers, and, simultaneously, to keep the remaining staff working efficiently.

OUTPLACEMENT

General Problems

Budgeting for a phaseout requires that specific reductions in personnel levels occur at scheduled intervals. To avoid the cost, turbulence, and

trauma of a reduction in force (RIF), management should lead a vigorous outplacement program. The program will require action by management and by staff to overcome eight important impediments to successful outplacement:

a. the lack of experience of many employees with conducting a job search campaign;

b. the reluctance of some employees to believe that the office and the Federal activity is going to cease operation;

c. the attitude of some employees that their departures will hurt the organization and burden their remaining colleagues excessively;

d. the lack of familiarity of many personnel specialists with the variety and magnitude of the problems involved in a closing;

e. the inertia at all levels of the personnel structure in completing personnel actions, especially in handling large numbers of performance appraisals; the normal speed for preparing, reviewing, signing, and dispatching such papers is not satisfactory during a phaseout;

f. the inadequacy of sources of job information that Federal employees usually consult;

g. the disincentive to job searchers resulting from pessimistic stories in the press and in rumor channels; and

h. rumors that the office will close sooner than announced, thereby encouraging panic, or rumors that the office will close later than planned, thereby reducing the urgency of finding new employment.

To deal with these problems, ONAC created, as much as possible, an atmosphere of calm, measured, confident change, while repeatedly urging employees to look for jobs and helping them with the process.

ONAC's Experience

Management encouraged all staff members to start their job searches immediately. This provided them with ample time to develop their job seeking skills, and it enabled management to identify and assist those workers who did not believe that ONAC was closing.

As efforts to close ONAC proceeded, management became increasingly aware of the functions that would have to be performed at each stage of the closing process. Analysis of those functions enabled management to determine the specific skills that would be required at each stage. With that knowledge, management was able to prepare a program plan that contained the following:

- a. the work that could be done only by incumbent employees and would be scrapped if they left,
- b. the work that could be done if former ONAC employees were detailed to ONAC from their new positions,
- c. the work that could be done if retired ONAC employees were re-employed, and
- d. the work that could be done by outsiders such as contractors.

Probably the single most important accomplishment associated with the phaseout of the ONAC was the organization of a system to locate employment outside of the Office for the staff. At the time of the original announcement, there were 92 employees working in the Office. During August of 1981 a truly dynamic program was designed that has succeeded thus far in outplac-
ing over 90 percent of the Office employees. Elements of this outplace-
ment effort included such things as:

- a. job counseling with employees by senior staff experienced in personnel matters;

- b. arranging for interviews for affected employees within EPA with other Federal agencies, and with firms and organizations in the private sector;
- c. assistance in drafting personal marketing letters to accompany resumes and SF 171s;
- d. identifying individual training needs for highly specialized employees and approving shortterm training to broaden their job market value in the public sector;
- e. refresher training in secretarial skills on the latest word processing equipment;
- f. conducting interview training programs for employees who were actively seeking employment elsewhere;
- g. conducting a training program in legal terminology for secretaries to enhance their value not only to EPA but also to other Federal agencies;
- h. having management aggressively intervene with prospective employers;
- i. assistance in preparation of personal resumes for employees and preparation of effective Standard Forms 171, Personal Qualifications Statements, (SF 171s);
- j. personally contacting other Federal agencies that were in a hiring mode, such as the Department of the Army and the Department of the Navy, on behalf of employees actively seeking employment in those areas;
- k. personally contacting Members of Congress that succeeded in gaining command level attention within the Army and Navy;

- l. conducting highly individualized retirement counseling seminars for those employees eligible for retirement;
- m. constant monitoring of job vacancies to track action on employees who applied for posted vacancies both within EPA and in other Federal agencies;
- n. arranging for private employment agencies to assist ONAC personnel at no cost to the individual or the government; and
- o. pursuing every other possible outplacement avenue.

In addition, another instrumental factor in the success of the outplacement effort was the establishment of a series of weekly senior staff meetings on the status of all outplacement activities. This eventually evolved into a daily staff strategy meeting between the Office Director, the Deputy Director, and the Director of Plans and Programs to stay on top of employment opportunities for the noise staff on a timely basis. As an outgrowth of these strategy sessions, high level contacts with Department of Defense (DOD) personnel officials were made, which assured ONAC of priority employment consideration for its remaining professional staff. The EPA Personnel Office cooperated in the outplacement process. It provided abundant information about Federal personnel procedures, all of which helped employees establish realistic rather than excessively pessimistic perspectives of their positions. Especially valuable to the staff were descriptions of RIF procedures, furloughs, and retreat rights.

Management assigned a high priority to the preparation, review, signature, and dispatch of papers required for personnel actions. It encouraged word processing personnel to use the excess time made available by the slackened pace to type SF 171's for all employees. Supervisors were requested to

be available for reference checks and to volunteer to call potential employers. Also, managers were instructed to give rapid attention to requests for performance appraisals, which would assist employees in securing employment with other government offices. These actions added credibility to the outplacement program. From the viewpoint of agencies that were hiring, the swiftness in which ONAC moved its personnel papers facilitated their efforts to review, interview, and evaluate the ONAC staff's suitability for positions available in those agencies.

Management provided information pertaining to jobs in three areas: Federal Government, other levels of government, and private sector. Naturally, job opportunities with EPA were given the highest priority. The next priority was other Federal vacancies. The Director of ONAC apprised other Federal employers about ONAC's talent pool. For example, he sent letters to the Mobility Equipment Research and Development Command (MERADCOM) at Fort Belvoir, Virginia. That approach succeeded, and on two occasions representatives of MERADCOM conducted interviews at ONAC. Another outplacement effort was initiated with the U.S. Army Materiel Development and Readiness Command (DARCOM) in Alexandria, Virginia. Also, a group of employees was assigned to obtain and circulate job announcements from Defense Department personnel offices. Management also investigated Congressional employment for secretaries and acquired and distributed application forms for those positions.

Because of ONAC's previous involvement with state and local governments, management was able to obtain information about job opportunities in several of those jurisdictions. To provide information about private sector opportunities, the Office subscribed to the "National Business Employment Weekly."

Personal contacts by the Office Director led to counseling sessions by a private employment agency that advised ONAC employees on the adequacy of their resumes and referred them to job interviews. Two employees of the EPA personnel office counseled ONAC staff members, throughout the phaseout period, on the quality of their SF 171s, their job qualifications, retirement options, retreat rights, and other subjects that were pertinent to job transition for Federal employees. In addition, staff members formed a selfhelp committee to discuss job openings and to stay abreast of RIF procedures. The Office Director designated a small office area where all job information could be collected and studied. All employees were encouraged to add their newly acquired job opportunity information to the collection.

As ordered by the Director, special training in resume preparation and techniques of job interviewing were provided for all staff members who requested it. A course in the work of legal secretaries was also provided to 10 clerical staff members. That course, also provided at the employees' request, culminated in the administration participants' receiving diplomas in legal terminology and procedures from an accredited secretarial school. The job interviews and legal secretarial courses were administered by ONAC's management support contractor.

Also, the Director called a brief meeting of the entire staff to congratulate each employee who left for a new job. These meetings demonstrated that jobs were available and obtainable, thus inspiring the remaining employees. Informal social gatherings, such as the ONAC Christmas party, were encouraged to further boost morale.

Outplacement was treated as an office project. Accordingly, management set goals and established schedules for employees to leave by certain dates.

In early March 1981, a goal of 40 percent reduction was set for September 30, 1981. Additional targets were set for subsequent periods, culminating in the closing of the office on September 30, 1982. The goals were displayed on a chart outside the Director's office. The chart was updated as the employees found new employment. Due to the untiring efforts, the goal of phasing out the program without the necessity of a formal RIF has become a reality. Additionally, the success of these efforts resulted in a savings of over \$1,000,000 in personnel costs to the Agency.

MOTIVATING THE STAFF TO KEEP WORKING

General Problems

The announcement of a closing undermines the morale and motivation of employees. The cessation of their program tells them that their past work is no longer valued; furthermore, the organizational structure in which they are working no longer holds any material incentives to maintain the same level of performance, because it is being dismantled. The only remaining material incentive is the reference, which will affect the nature and salary of the future position. Another type of motivation that remains is the intrinsic rewards that accrue to a job well done, for the final work of closing the organization is as important as any previous assignment. Since management can do very little within a brief period to convince workers of the inherent worth of work, managers must rely on other techniques, relating to improving the chances for new employment. Emphasis can be placed on performance evaluations. A final important motivating factor is maintaining the quality of the physical and organizational environment of the office.

A primary fear that arises after a closing is announced is that staff members who leave are indispensable. Those who remain will have to confront

countless issues and tasks of which they have insufficient knowledge. Management must act to reduce this predictable fear.

During a closing, there is little incentive for maintaining the physical appearance of the work space. When employees leave, they often fail to identify materials that should be discarded or archived, leaving the decision to dispose of the materials to those who stay with the organization. Consequently, furniture and boxes filled with papers accumulate.

ONAC's Experience

Management emphasized that employees' performances during the closing would be reflected in their performance reviews. Accordingly, individual employee's performance standards were changed to reflect phaseout activities and their newly assigned responsibilities. Because of the gradual reduction of the organization's activity, the employees were given sufficient time for job search work. Management supplemented the employees' feelings of security by providing extremely clear job definitions, performance standards, and deadlines. Within that context, the employees were able to establish effective schedules for both their job related and job search activities. Also, the definitions, standards, and schedules provided sufficient motivation for the employees to continue achieving concrete objectives that helped to close the organization and maintain morale.

To mitigate the remaining employees' fears that they would be overwhelmed by unfamiliar tasks, management established and enforced a standard checkout procedure. Employees who left had to demonstrate that all of their files, contracts, and other materials had been handed over to an individual who had sufficient grasp of all these matters to continue with the closing efforts.

In general, administrative matters were turned over for processing to the contractor that ONAC had hired to effect the close. Technical matters were either terminated as a part of the overall reduction of the program or turned over to another Federal agency for completion. As these processes developed, the staff members who remained became increasingly confident that they could complete the closure without embarrassment or severe stress.

With both the intrinsic and extrinsic related rewards for working at ONAC reduced to their lowest levels, management took extraordinary care of the physical appearance of the office space. An important spur to increasing staff concern for office appearance was scheduled visits by the Assistant Administrator for Air, Noise, and Radiation. Preparation for those visits reminded all employees of the need for orderliness and of the sense of well-being that an attractive work area fosters. The management alleviated the problem of abandoned furniture and boxes by establishing a regular schedule of surplus equipment pickups and by disposing of all files promptly.

The members of the rearguard, who were essential to the closing operation, had a significant morale problem, for they felt that their closure efforts would not be valued by prospective employers. Furthermore, management decided to reduce the size of the rearguard, thus compounding the morale problem. To mitigate that problem, management reinforced the Office with a group of experienced individuals (retired annuitants) to assist in the closing operation. The management support contractor was also used and performed the following functions: resource monitoring; document, furniture, and equipment disposal; publications management; word processing; courier services; and technical writing and editing. The ONAC managers judged that

those operations, while at all times under their control, were readily separable from the policy related work that required the attention of ONAC veterans. The contractor staff also assisted with the administrative chores involved with the transfer of noise control responsibilities to state and local governments.

SECTION 7. MAINTAINING FACILITIES, EQUIPMENT, AND CONTRACT RESOURCES

INTRODUCTION

When a decision is made to close an entity, it is presumed that the organization will incur some losses because of the curtailment of unfinished work. However, it is important to avoid the unnecessary loss of resources that may be applied to other ventures. ONAC earmarked as many of its facilities, equipment, and contract resources as possible for EPA, for other Federal agencies, and for state and local governments. The management set a high priority on controlling those resources and on disposing of them effectively, thereby maximizing savings to the taxpayer.

MAINTAINING FACILITIES

General Problems

If the organization being phased out has more than one facility, it is less costly and more efficient to centralize the remaining functions in as few facilities as possible. The management must determine the feasibility of closing facilities and which ones to close.

If any facilities are closed, provisions have to be made for accommodating the documents and equipment from those facilities. Also, as the staff in the remaining facilities is reduced, offices that are vacated will soon be filled with abandoned papers, supplies, equipment, and furniture. If emptied, these offices can be used for temporary storage of equipment and files from the closed facilities. Furthermore, having supplies scattered among unattended offices will create the risks of duplicative supply purchasing and pilferage.

Closing a facility requires coordination of a number of activities that are performed so rarely or in such small increments that few Federal employees are familiar with them. Furthermore, because the weight and bulk of office furniture, equipment, and materials is unnoticed in the course of daily work, the difficulties of moving an office are not recognized in advance. In the interests of safety and efficiency, managers should acknowledge their inexperience in closing a facility and resort to careful planning, rational organization, and specialized assistance.

ONAC's Experience

Through fiscal year 1981, the office functioned at three locations: headquarters in Crystal City, Arlington, Virginia; the contractor-operated Technical Reference Center (TRC) in a separate building in Crystal City, and the contractor-operated National Information Center for Quiet (NICQ) in Rosslyn, Arlington, Virginia. As soon as the basic outlines of the phaseout were clarified, management decided to close the TRC and NICQ facilities. That decision was based on three factors. First, the activities of TRC, which served primarily as a resource center for the regulatory aspects of the noise control program, were curtailed; consequently, the need for TRC dissipated. Second, NICQ, which was responsible for shifting most of the noise control publications to state and local governments, could be moved to ONAC headquarters; space there would become available as employees left for other jobs. Third, the shift of NICQ would enable ONAC to let the contract for that service lapse. The NICQ work could then be continued by EPA and non-EPA employees (funded by Title V of the Older Americans Act) and by ONAC's support contractor.

Soon after the announcement to close, occupied offices in the headquarters facility became separated by vacant ones, which rapidly filled with papers, equipment, and furniture of doubtful utility. After a brief inspection, the Director decided that one hall, approximately 15 percent of the office space, could be vacated entirely. The contractor who was hired to support the closing arranged for the disposal of excess property. Those offices were then used as storage space for the equipment and files retrieved from the TRC. The offices were emptied again as soon as the states and the Federal Records Center accepted the equipment and files.

Before closeout, each of the ONAC divisions maintained a supply cabinet. When the size of the staff diminished, there were no longer enough employees to properly monitor the cabinets. Thus, management decided to centralize the supplies to prevent duplicative supply purchasing, ultimately reducing costs, and to reduce the possibility of pilferage. Accordingly, the Director ordered the divisions to turn in their supply stocks to his office. A supply room was set up in a small, secure office that had been vacated by a former staff member.

The ONAC team formulated a detailed plan for closing TRC and NICQ. It consisted of answers to a series of questions.

a. Who will accept the moved materials? Could the staff use some of them? Could others go to other operating offices? Could the remainder go to the EPA warehouse?

b. Are those who are to receive the materials ready for them? Do the transfers involve paperwork that must be completed in advance? Does someone in the receiving organization know what is coming and when?

c. When must the move be completed? Can it be accomplished earlier?

d. Are movers available to complete the job before the deadline?

e. What is the most efficient sequence in which to move the items?

f. Will any of the material or equipment, such as computers, require special packaging?

g. Is a complete inventory available that can be used to show the disposition of all materials and equipment after the move? Will a computerized listing be helpful?

h. Have arrangements been made to cover all the costs of the move? How expensive are packing materials, such as binding tape, that are used in large quantities? What is the most expensive element? Are estimates necessary?

i. Has the working staff been informed of the disruption that will occur on the days of the move? Are there any days when the move must not take place because of activities that cannot be disturbed?

Answering those questions required many decisions and coordination inside and outside the office. Although this work was not conceptually difficult, it demanded ingenuity and boldness, qualities not frequently associated with administrative work. Predictably, as the team found the answers to the key questions, they uncovered subsidiary issues that necessitated further research. In that way, the planning effort grew and created the need for written plans and flow charts for each portion of the closing operation. Therefore, it was essential that the staff members who prepared the plans be proficient with operations analysis techniques, including the critical path method (CPM) and the performance evaluation and review technique (PERT).

At times, options for conducting the move had major cost and scheduling implications. Therefore, the Director had to be accessible, for only he could evaluate those variables in relation to the overall budget and plans of the office. Because the Director was readily available, the planning team was able to develop a dialogue with him that yielded a series of lowest cost plans that were minimally disruptive to office operations.

Following usual procedures, ONAC assigned specific portions of the move to employees. An experienced manager was designated to orchestrate the entire operation. A management analyst was assigned to ensure that all EPA procedures for control of property were followed. A second management analyst was named to maintain a continuous inventory and to guarantee the completion of all required paperwork. These three professionals formed the core of the team; they were augmented when necessary by word processing technicians and messengers. All of the team members were employees of the contractor that was hired to assist with the closing. The team was supervised by the director of ONAC's planning staff, except when the intervention of the Director of ONAC was necessary.

MAINTAINING AND DISPOSING OF GOVERNMENT-OWNED PROPERTY

General Problems

The major problem involved in maintaining the taxpayers' property during a phaseout is security. The staff members, who normally monitor the property by using it frequently, are leaving. Few of them have experience in disposing of property; almost none have been formally accountable for the return of large quantities of furniture and equipment to Government surplus. It is likely that only the property officer has any conception of the amount of property in an office, and even that person probably has little appreciation

for the amount of work required to document the movement of the property and to move it. Those conditions create an atmosphere in which the chances of loss of property from theft and neglect are increased.

In addition, not all the property for which the organization is responsible may be in its possession. Some equipment may be in the hands of state or local governments, universities, other grantees, or contractors. Nevertheless, the agency, before it closes, must gain control of all the property and dispose of it correctly.

The following steps will help to alleviate these problems:

- a. Establish and maintain an accurate and complete inventory of all accountable equipment and furniture. This inventory should be accurate already, but it probably has been neglected to some degree because people have moved property over the years without notifying the property officer.
- b. Establish and delegate decisionmaking authority that will ease the disposal of property as soon as the need for it ends.
- c. Develop a routine procedure for arranging and supervising the movement of property and the transfer of custodial responsibility.
- d. Maintain and eventually transfer to the successor offices the records of property disposition actions.

ONAC's Experience

At the onset of the phaseout effort there were over 1,000 pieces of furniture and equipment located in the Office for use by the full complement of 92 people. A computerized inventory system was established to track every item and ensure that it was expeditiously and systematically surplusused so that it could be used by other Agency personnel as it became available.

The overall savings as a result of these efficient and timely actions amounted to well over \$250,000 to the Agency.

The ONAC team began this project by establishing a complete inventory of equipment and furniture in the ONAC Headquarters and in the EPA regional and satellite offices. The inventory also included property lent or leased to state and local governments, universities, and colleges; to contractors; and to professional, trade, and public service organizations. For each item, the inventory contained the name and description, the EPA property number, the manufacturer's serial number, the custodian's name, and the current location.

To ensure the quality of the inventory and its integration with other systems, it was compared with official listings maintained by the EPA Property Management Division and by the EPA Contracts and Grants Property Division. When items of property were in ONAC's possession but not listed on EPA's inventory, ONAC assigned them unique numbers and listed them. In that way the property was included in the inventory, and the way was prepared for properly transferring the items from ONAC to other organizations.

The inventory was automated, prepared on an electronic word processor with a capacity that was sufficient for the task. The property list was stored on a diskette and the inventory information was kept up to date by amending the diskette record. Typical changes included shifts of location, inside and outside the Office, transfer of custodial responsibility within the Office, and surrender of responsibility to other EPA programs, to the EPA warehouse, and to state and local governments. Automation of the inventory facilitated all these record changes, and the increased efficiency,

accuracy, and timeliness more than offset the cost of writing the inventory program.

Management established a file of all official property records. It contained the forms that assigned property to individuals and showed the trail of ONAC property that was transferred or, in a small number of cases, lost or stolen. The file contained a receipt, signed by the employee with custody, for every item of the inventory. Receipts from external organizations were added to the file when employees left, and their furniture and equipment was transferred from ONAC.

Management also simplified its decisionmaking related to the disposal of property. Standing operating procedures (SOP's) formed the core of this effort. A property officer, designated specifically to handle the phaseout, prepared and revised the SOP's when necessary. By planning the procedures and following them, the property officer achieved several important goals.

- a. Furniture and equipment needs and resources were estimated for the entire office, not for individuals or groups.
- b. A regular schedule for property disposal was established, a pattern of moving that was less costly than sporadic moves that required special efforts by the moving contractors.
- c. All employees could see the equitable application of the procedures, which minimized suspicions of favoritism.
- d. The security of property was ensured.
- e. Cost-benefit analyses of varying means of disposing of equipment were expedited.
- f. The property was moved on time to its proper destination.

Eight SOP's were adopted.

a. The chain of responsibility for property would parallel the chain of command in the office; when an employee left, responsibility for his property would shift to his superior.

b. No employee could leave until his property was officially transferred. The transfer was not considered complete until the inventory was changed and the office copy of the new receipt was filed.

c. The property manager had to dispose of property as soon as it was determined to be excess.

d. No internal moves could occur unless the property officer was notified in advance and all property records were adjusted.

e. All employees were informed of EPA policy forbidding the removal or defacing of agency assigned identification tags; this policy was extended to include office-assigned identification tags.

f. The contents of all property to be transferred had to be disposed of properly, either discarded, donated to the EPA library, sent to the archives, or moved to a temporary storage area.

g. A temporary storage area was set up for miscellaneous office equipment that was to be offered to other EPA programs in ONAC's building or to be returned to the EPA warehouse.

h. Suspense files were established for receipt of departing employees' equipment and of official acknowledgements by the Property Management Office that property had been returned or transferred. Prompt followup action was taken if suspense dates were not met.

Management selected a coordinator to manage all internal and external moves. The coordinator developed a detailed plan for achieving the following objectives:

- a. coordination of the date and time of the move with ONAC employees, supervisors, moving contractors, and building managers;
- b. accurate estimation of move costs;
- c. acquisition of packing materials, including boxes, sealing tape, and labels;
- d. prevention of personal injury and property damage;
- e. elimination of theft or loss of property;
- f. availability of common tools that prove useful in moves, including pliers, wrenches, screwdrivers, and hammers;
- g. availability of trained people to pack and unpack equipment, records, and furniture;
- h. readiness of a step-by-step plan for all aspects of the move, including detail that described which items would be moved from each room, through which corridors, to which rooms, and in a specified configuration within the rooms;
- i. delegation of complete authority for the actual move to the move coordinator to minimize confusion, inefficiency, and resentment; and
- j. availability of auxiliary staff to manage unforeseen contingencies, such as competition for use of loading docks and freight elevators.

This plan was especially important for moves that involved compression of office operations into smaller space. In such moves, the first step was to reduce the total volume of property. Since many employees had become, through habit, dependent on all the property in their offices, the Office

Director had to encourage them to dispose of everything that was not essential for their daily work. The detailed plan for the move was offered as evidence of the need for sacrifice, for all employees could see from the plan that every staff member was losing space and that disposal of some furniture and records was necessary.

After the moves were completed, management encouraged rapid restoration of the office to its normal work routine. Special effort was made to achieve the following objectives:

- a. disposal of items consumed in the move, such as broken boxes, and storage of reusable items;
- b. inspection of all offices to locate property and to reconcile property inventories with deviations from the moving plan;
- c. filing of official records related to the move, including payment authorizations and property receipts;
- d. changing of floor directories, telephone directories, and mail delivery routes;
- e. inspection of fragile equipment, assignment of responsibility for damages, arrangement for repairs, and filing of required documentation; and
- f. identification of lost or stolen property, initiation of investigations, and filing of necessary reports.

The final task involved in disposing of Government property was to shift ONAC's sound measurement equipment to the appropriate state and local governments, those that elected to begin/continue noise control programs after the cessation of Federal support. Some of the equipment was on loan to state

governments, but not necessarily to those that were to continue their programs; the remainder was in storage at ONAC Headquarters, at the EPA regional offices, and at two national technical centers. Management sent the equipment to the appropriate states.

With the help of the Assistant Administrator for Air, Noise, and Radiation, ONAC staff obtained from the regional offices lists of equipment needed by the states. If the equipment was in a state that would continue to use it, revocable license agreements were executed to have it remain there. If the equipment was not present in a state that needed it, ONAC management had it transferred from another area, ensuring that its loan was covered by a revocable license agreement.

The shifting of property required extensive preparation because no inventory of the sound measurement equipment was available. Management built an inventory that included the following information about each item:

- a. a complete description,
- b. the EPA-assigned identification number,
- c. the manufacturer's serial number,
- d. the current location,
- e. the acquisition cost,
- f. the control number of the acquisition document, and
- g. the control number of the revocable license agreement or grant to which the equipment was assigned.

The staff also prepared a master list of all the states' equipment needs and of the training elements required to facilitate use of such equipment. Also included were the titles of appropriate background and technical documents; many of these studies provided examples of equipment applications.

By comparing the master list with the inventory, the staff was able to prepare a list of equipment to be shipped to the participating states. Shipment dates were fixed so that the state would receive the equipment before expiration of the respective revocable license agreement. This schedule permitted timely renewal of the revocable license agreements with each state.

Items that were in storage at ONAC were shipped under revocable license agreements. Equipment that was on loan to state and local agencies that were not to continue in the program was returned to headquarters and then shipped, under revocable license agreements, to continuing programs. This was a time-consuming chore, for it included arranging and procuring shipments and preparing and filing all documentation.

The revocable license agreement is a useful method of shifting property to state and local governments. However, it requires paperwork each year, and transferring the titles seemed to be a much more expedient solution. Transfer of titles was thought to be particularly appropriate in ONAC's case because the Administrator stated that the EPA role in noise abatement and control was ending permanently. Therefore, it seemed highly unlikely that EPA would need the sound measurement equipment again. However, Federal law forbids such transfer, except through a lengthy process that ONAC could not afford. For a while, ONAC considered requesting enabling legislation that would permit a direct shift of the equipment to the states; a precedent for such a transfer exists. However, the Assistant Administrator for Air, Noise, and Radiation decided that the revocable license agreement was a more satisfactory approach, especially since the unique equipment procurement provisions of the Quiet Communities Act permitted ONAC to use revocable license agreements and avoid normal (and more cumbersome) transfer mechanisms.

MAINTAINING AND DISPOSING OF LEASED EQUIPMENT

General Problems

The problems involved with leased equipment are similar to those involved with owned equipment. Companies that lease equipment are understandably reluctant to terminate leases. Their lease contracts specify that the lessee has full responsibility for notifying the leasing company, 30 days in advance, when it does not want to renew a lease. Without such notification, the company automatically renews the lease and initiates charges for the new lease period, even if the equipment is not being used.

ONAC's Experience

During the course of the closing, some of ONAC's leased equipment fell into disuse because their operators had obtained jobs elsewhere. Consequently, the staff reviewed all lease contracts and immediately informed the leasing companies, in writing, that ONAC wanted to terminate the leases. However, the companies failed to remove their equipment. Staff members informed them repeatedly that their expensive equipment, now off lease, was sitting idle and occupying ONAC's increasingly compressed space. ONAC eventually threatened the companies with legal action to relieve itself of responsibility for the security of the equipment. At that point, those firms removed their equipment.

ONAC prepared a special inventory of leased equipment. It contained the same information as the inventory of owned property: each item's identification, its custodian, and its location. In addition, it included the monthly lease cost, the lease expiration date, the accumulated equity, the vendor's name, and the control number assigned by the vendor.

The inventory helped management to address several pertinent questions repeatedly during the phaseout.

- a. Which leases are to be cancelled?
- b. What is the cost of cancelling a lease as opposed to the cost of allowing the leases to expire?
- c. Do other Government offices wish to purchase the equipment to take advantage of the Government's equity?
- d. Are other Government offices, attempting to lease the same equipment, willing to assume ONAC's leases?
- e. Can leases of essential equipment be renewed for less than one year to coincide with ONAC's closing? Are funds available for the higher costs that partial-year leases would demand?

Finally, ONAC personnel did not attempt to move or pack the leased equipment. The vendors required that only their technicians pack and transport the equipment and remove high voltage connections and environmental control devices.

MAINTAINING CONTRACT AND GRANT RESOURCES

General Problems

The decision to close an organization nullifies the value of those contracts and grants that are intended to support the organization only in the long run; these should be terminated for the convenience of the Government unless termination would result in increased cost. Other contracts and grants may retain their importance because they are needed in the short run, and they should be retained until the organization closes. They may, for example, expedite phaseout operations. (In the remainder of this discussion, grants and contracts will be referred to as contracts except where

the treatment of grants differs significantly from the treatment of contracts.)

Effective management of contract resources involves five processes that are useful in optimizing contract resource benefits to the organization:

- a. evaluation management must assess each contract to determine its long term or short term relevance;
- b. termination processing management must initiate action by the contracts officer to officially cancel the contracts no longer needed;
- c. continuation processing management must ensure that the contracts that need to be retained are funded sufficiently and that they are controlled adequately, even if the project officers leave for other jobs;
- d. transfer processing management must plan to transfer contract management authority and contract records to other organizations that need the contractor's work; and
- e. management support services with the departure of organizational staff, it is necessary to hire a support contractor to provide continuity in facilitating phaseout activities.

ONAC's Experience

a. Evaluation. When the decision to close ONAC was announced, 170 contracts and 94 grants were in force. The Director was able to determine the need for contracts that supported the entire Office or the Director's activities exclusively. Only three contracts (and no grants) had those purposes. All three were allowed to lapse at the scheduled end of the period of performance, one year before the Office was to close. It was not reasonable to terminate the contracts because the contractors had to spend the

time remaining preparing government property for transfer to EPA offices, archives, and warehouses.

All of the other contracts that ONAC had in force were related directly to ONAC's divisions. The Director instructed the Plans and Programs Staff (P&PS) to prepare a method for evaluating those contracts. The method was to take into account the opinions of the project officer and the division director about the value of the contract to ONAC's short-term goals and to other Government entities. No contract was to be overlooked.

The Director of P&PS prepared a standard contract synopsis form that was to be completed by each project officer who was in charge of a contract. The synopsis form is shown in Appendix C. When all of the projects had been reviewed, it was determined that six could be terminated with advantage to the Government.

In this instance, grants were evaluated differently. Most of ONAC's grants were made to assist state and local governments with establishing their own noise control programs. That was the case even before the Administrator of EPA decided to transfer Federal authority for noise control to the states. Since the goals of the grants made before fiscal year (FY) 1981 conformed with the goals of the Administrator, the grants were allowed to continue except where work was coming to completion. Additional grants were made, where appropriate, to hasten the process of state assumption of the previously Federal authority for noise control.

b. Termination Processing. The Director of ONAC notified the EPA Procurement and Contracts Division (hereafter called the Contracts Office) of the need for termination of contracts. The Director of the P&PS called the Contracts Office periodically to inquire about the progress of the

termination actions. During these inquiries, ONAC ascertained that the Contracts Office had not completed the typing of the terminations that had been requested. From ONAC's viewpoint, the delay was understandable, since it could not be expected that the Contracts Office could adapt rapidly to the number of terminations required by the extremely unusual process of an office's closing. The Contracts Office would also be unlikely to understand the closing office's responsibility for acting swiftly to recoup as much deobligated funding as possible for the Government.

When he became aware that the terminations were stalled in the Contracts Office, the Director of ONAC sent a memorandum to that Office requesting more rapid action. This memorandum was effective in convincing the Procurements Office to give special attention to ONAC's terminations.

The experience with attempting to terminate contracts illustrated several important points.

(1) Outside servicing organizations, such as procurement offices and personnel offices are no more familiar with the problems of closing an organization than are the members of the closing office; thus, as the effects of the closing ripple through the outside organizations, the total volume of turbulence faced by the closing organization increases, and in ways that are not within the closing organization's control.

(2) The need for frequent communication between the closing office and the servicing offices increases.

(3) Detailed descriptions of the closing agency's predicament should be ready in case pleas must be made for special handling of the closing agency's paperwork.

(4) The head of the closing office should meet with the heads of the servicing offices; this would demonstrate the needs of the closing office more emphatically than telephone communication.

c. Continuation Processing. ONAC identified a small number of contracts that would have to continue through its last year of existence. Working with the project officers' synopses of the contracts, management was able to determine when the need for the outputs of those contracts would end, i.e., when those contracts could be terminated. In addition, management insisted that the project officers notify all contractors whose contracts had been continued that ONAC could not tolerate a late delivery or a cost overrun; the organization would not exist to deal with such exceptions.

Grants were continued as well. They were coordinated with equipment loans. Although no FY 82 funds were allocated to grants, many of the grants made in FY 81 carried through FY 82. All grantees were notified that they would have to operate without ONAC funds in FY 83 when the Federal Government would no longer take responsibility for noise control. ONAC project officers reviewed all grants to confirm that they would continue long enough to allow for ONAC to close out its relationships with the grantees.

The goal of encouraging all ONAC employees to find new jobs necessitated written reports on all contracts and on contractors' progress. Management required such reports of all project officers in addition to the contract synopses mentioned earlier. The reports were used by successors, both within ONAC and in other organizations that assumed responsibility for the contracts.

Management also issued a memorandum requiring all project officers to designate, in writing, the person who would assume responsibility for their contracts when they departed for new jobs. The memorandum also required the departing project officer to brief his successor to facilitate an effective transfer of responsibility.

d. Transfer Processing. At the beginning of the closeout, none of ONAC's management team knew the procedures for transferring responsibility for a contract to another agency, i.e., an organization outside of EPA. This was an important consideration because many of ONAC's contracts were valuable to other entities such as the Department of Transportation (DOT), the Department of Health and Human Services (DHHS), and the Department of Labor (DOL). To identify the proper procedures for transfer, the Director of P&PS interviewed a representative of the Contracts Office. In that interview, it was determined that the transfer required three steps. The first was a memorandum from the project officer to the EPA Contracts Office containing the EPA contract number, the identity of the agency that would take over the contract, the name and address of that agency's contracting officer, and the name of the project officer in that agency who would take over the contract. The memo also had to state whether ONAC expected to get value back from the gaining agency to reimburse EPA for funds expended on the contract. It was understood that this would probably be a negative statement. The second step was to acquire an official acceptance letter from the gaining agency indicating they would accept responsibility for the contract. The third step would occur when the Contracts Office received the documents. At that point, they would issue a modification to the contract transferring responsibility to the gaining agency.

All of this information was provided in a memorandum included in this report as appendix D. Appendix E is a sample of a letter from a gaining agency indicating that it will accept responsibility for an ONAC contract.

It was ONAC's responsibility to ship all project records to the new organizations.

e. Management Support Services. The management of ONAC took another contract action that was seen to be critical to the phaseout effort. It procured the services of a management support contractor that could analyze and execute the administrative aspects of the closing while the ONAC staff devoted its time to policy aspects of the closing and to finding new employment. The management support contract was prepared in extremely close cooperation with the EPA Contracts Office because of its highly unusual nature. As negotiated, the contract required the contractor to provide the following services:

- (1) technical documentation;
- (2) word processing and editorial support;
- (3) financial resource control;
- (4) disposition of information systems, libraries, and files;
- (5) courier services; and
- (6) control and final disposition of all EPA property.

Because of the subject matter and the nature of the assignment, confidentiality was a significant concern. Management made clear to the Contracts Office and to the contractor that any violations of confidentiality would result in termination of the contract.

The management support contract, as predicted, turned out to be an extremely useful arrangement. Management was able to devote almost all of

its time to policy and outplacement concerns. The contractor analyzed the closeout process and advised management of gaps in knowledge, resources, or staffing that could impede the progress of the closeout.

SECTION 8. MAINTAINING FISCAL ACCOUNTABILITY

INTRODUCTION

The fiscal affairs of a closing agency, like other aspects of its operation, proceed in an atmosphere of uncertainty. Consequently, improvisation must augment careful budgeting as unpredictable needs arise. The budgeting process, fraught with conflict in normal situations, becomes a continuous struggle to skimp, glean, and hoard. Thus, the closing organization must adhere precisely to conventional control procedures and explore and exercise several unfamiliar options.

EXERTING STANDARD CONTROLS

General Problems

The standard procedures of fiscal control and the decentralized authority for decisionmaking that exist when an organization is at full strength are unnecessary during a phaseout. Since the only fiscal controls necessary are those that pertain to the closing, it will be more efficient and less costly to centralize the accounts, reducing the diversity of fiscal transactions and the number of people with authority over them. The employees released from the fiscal work will be available for work related to the closing.

ONAC's Experience

ONAC had followed standard procedures of fiscal control since its inception. When the organization was at full strength, most fiscal controls had been delegated to division directors, with the Director of ONAC retaining final authority over major decisions and over the general direction of budgets and expenditures. When the closing was announced, the Director recentralized fiscal accounts to achieve a firmer grasp on expenditures.

Moreover, fiscal work at the division level was minimal. Once persons involved in that work had transferred vital information to the central fiscal accounts, they were able to give greater attention to outplacement, a major goal of the closeout project.

By centralizing accounts, management signified that the chief administrative analyst was an essential member of the rearguard, a person who would be invited to stay until the end. This analyst was well suited for the job, being close to retirement. However, since there was a possibility that this analyst would leave ONAC during the phaseout, a contractor staff member was trained as a reserve.

With the centralization of fiscal control, the Director acted immediately to stop all actions that could cause increased expenditures. He imposed a freeze on hiring, contracting (except for the closeout work), purchasing and leasing of accountable and expendable material, traveling, and printing. (Some of these functions were reactivated later, but at only miniscule levels.) By taking these actions, management acquired a tighter rein on resources and imposed an attitude of extreme thrift on the entire organization. Staff members knew they would have to complete their work without resort to many of the resources that had previously been readily available.

Another significant administrative improvement was the development and implementation of a new computerized system for tracking ONAC-wide financial expenditures. The system was adapted to existing word processing and computer capabilities and served as a direct audit and tracking system for all of ONAC's financial expenditures. To ensure the success of this new financial system, a training program to facilitate the introduction and operation

of the system for all working level personnel in the office was implemented. Special sessions were held with the senior staff to explain and obtain their support in implementing the program. This approach provided a smooth transition to the new financial management system and provided a basic support to the new system through training before implementation. The success of this system reduced professional staff time devoted to financial planning by 30 percent while at the same time it improved the accuracy of financial management expenditures. This improved financial system significantly aided the closing out or termination of over 170 contracts by the Office, as a part of the overall phaseout effort, resulting in a savings of approximately \$270,000 to the taxpayer.

DEOBLIGATING FUNDS

General Problems

A closing organization can save money by terminating contracts, inter-agency agreements, and purchase orders. The amount saved depends on the speed with which the terminations are effected. It is quite possible, however, that the other parties involved are unaware of the organization's impending closure; therefore, they may treat the termination efforts on a routine and untimely basis. Since delays will cost the organization money, it must act immediately to inform the other parties of the urgency of the situation and demand high-priority treatment.

The termination of contracts can result in considerable savings, but it is unlikely that such funds will be returned to the closing organization because of budget cycle rules and processes. The process of ending a contract includes negotiation of final claims, procurement of final approval, and performance of a final audit. It is doubtful that all of these functions

can be performed for all the contracts to be terminated before the organization closes; however, the savings to the Federal Government are real, because these previously obligated funds revert to the U.S. Treasury.

Funds obligated to small purchases can be recouped and applied to the closing operation, usually within the fiscal year in which the decision to close is made, since termination of purchase agreements does not require complex negotiations. However, since the agreements are legally binding, the vendors are sometimes unwilling to terminate them.

Once the negotiating process of granting a refund from a purchase agreement or from an interagency agreement is completed, the closing organization must ensure that the appropriate paperwork is submitted and implementation occurs. In each case, the vendor or selling agency must arrange with the financial management office of the closing agency to remit funds or a credit to the organization's accounts. The closing organization must ensure that the appropriate credits are made by monitoring its accounts closely and by matching the entries with the refunds that are due.

ONAC's Experience

ONAC terminated the contracts that were no longer needed, but because it could not effect the terminations before the office closed, it was unable to recapture those funds, which reverted to the U.S. Treasury.

The process required precise attention to details. The EPA Contracts Management Office did most of the work, but it required assistance from ONAC personnel in dealing with some of the issues. In addition, ONAC staff ensured that financial information relating to the terminations was received and entered properly in EPA's financial management system.

ONAC project officers assured management that the unfinished work on contracts was truly unrelated to the closing operation to prevent useful contracts from being canceled inadvertently. For contracts facing termination, the project officers also verified how much of the work specified in the contracts had been completed because that determination would affect the termination settlement between the contractor and the Government. Finally, project officers urged the contractors to submit invoices so that an estimate could be made of funds that would accrue to EPA because of the deobligation actions.

As project officers left ONAC for other jobs, the remaining ONAC project officers or contractor employees had to assume the administrative duties required to terminate contracts. The Director of ONAC required that the departing project officers write synopses of all unfinished matters relating to the contract terminations. Using that documentation, the management support contractor personnel were able to follow through with the closeout work.

During the termination process, ONAC realized that many EPA Contracts Office staff members and many contractors were unaware of its closing. Thus, EPA treated ONAC's efforts, quite properly, on a first-come, first-serve basis. Because of the urgent need of ONAC to terminate the contracts, routine processing and service were insufficient; higher priority treatment was essential. Therefore, those who were tracking the terminations explained ONAC's strained fiscal situation to EPA personnel and to several contractors. Thereafter, ONAC received adequate assistance from all involved. It was noted, too, that when ONAC personnel made the explanations in person rather than over the telephone, they received help more rapidly.

ONAC canceled its subscriptions to technical journals and magazines, and it was able to convince many of the publishers that it was in their best interests to remit prorated refunds, even though in most cases granting refunds was contrary to established policies. In requesting those refunds, the ONAC team made repeated phone calls and was persistent in asking to speak with executives of those publishing firms. The team members' explanations were successful for two reasons. First, they convinced the executives that former ONAC staff members would subscribe again from their new agencies and positions. Second, they explained that the refund requests were related to national policy. ONAC recouped over \$8,500 in refunds and applied it to the closing operation budget.

ONAC also terminated its interagency agreements, obtained refunds from those agreements, and applied those funds to its phaseout work. The terminations involved the simple process of writing amendments to the existing agreements. Those refunds were probably the simplest to process and recoup.

In summary, the ONAC team gathered the impression that face-to-face contact with the staff of the EPA financial management office had a positive effect on the accuracy and swiftness of the refund crediting process. By maintaining personal contact with the financial management staff, the ONAC team enabled them to take a creative, active approach to solving ONAC's unusual fiscal problems.

BUDGETING FOR CLOSEOUT

General Problems

The process of budgeting for a closeout is in many ways similar to budgeting for any other Federal operation. The basic requirements will reflect the functions that the organization must perform to achieve the orderly

cessation of work. Only a few additional budget items, all relating to projects that are required by law or policy to survive the organization's demise, need to be considered. Although those items will contain some uncertainty, they can be given a fixed budget. If that budget proves to be insufficient, additional resources can be made available by an additional decision at the level of management that made the initial decision to close.

From an internal budgeting viewpoint, three factors are primarily responsible for causing uncertainty:

- a. the possibility of a reduction-in-force (RIF), which will result in decreased costs for salaries, but in increased cost for payments for accrued leave and severance pay;
- b. the speed with which staff will leave for other Government positions (the swifter the departures, the greater the surplus in funds budgeted for compensation); and
- c. the number of departing employees who will not move to other positions in the Government and, consequently, will receive payments for accrued leave. Each of these items must be estimated, and because most employees have not experienced a closedown, little basis for such estimates exists.

If there is any indication that a RIF will not occur before the closing, the severance pay problem can be avoided. If such evidence is unavailable, management should calculate the amount of severance pay and accrued leave that would potentially be disbursed. The calculation of accrued leave payments can also be spread over the fiscal year based on reasonable scenarios of the pattern of staff departures for non-Government jobs. By definition,

the same scenarios will provide tentative schedules of salary expenditures for the closing organization's staff.

The reduced level of activity of the organization will naturally lead to concomitant reductions of other budget items such as travel, supplies, printing, automated data processing (ADP), and moving services. The organization can achieve further reductions by establishing severe cost constraints as a performance criterion for managers and by reinforcing the standard agency procedures for cost control. Management should delegate full responsibility for control of all these cost items to a member of the rearguard, who should have full authority to approve or veto any expenditure.

ONAC's Experience

Since EPA initially selected a gradual phaseout as the method of closure, ONAC management knew that a RIF would be most unlikely; therefore, it did not include funds for severance pay in its closeout budget. In addition, it only allocated funds for accrued leave reimbursement for part of the staff.

During the first 10 months of the phaseout, 44 employees departed. Of these, 10 found jobs in EPA, 17 in other Federal agencies, and 11 in the private sector; 6 staff members retired. Thus, only 17 employees received reimbursement for accrued leave. That distribution should not be perceived as a probable pattern for other organizations. It only shows that the closing organization should make some provision for reimbursement for accrued leave in its budget, although such projections should be made for part, but not all, of the staff.

TRAVEL, OFFICE SUPPLIES, AND PRINTING

General Problems

Organizations faced with a phaseout cannot continue routine provisioning of travel, office supplies, and printing. Moreover, responsibility for these items must be centralized and consolidated. With limited funds, the organization cannot afford to permit a wide latitude of accountability across its subelements (divisions). And, too, with reduced workloads and staff, a division's claim for control over these budget items is weakened.

ONAC's Experience

ONAC imposed several travel restrictions.

a. Taxi or travel vouchers had to be submitted within 10 working days after the expense was incurred. If the voucher was submitted more than 10 working days after the expense was incurred, it was not approved.

b. Travel from a staff member's residence to a location other than his official duty station would be paid only if the distance exceeded the distance from his home to the official duty station.

c. All travelers had to use the EPA shuttle bus or the METRO Rail Transit System when available. This included walking 2-3 blocks to meetings held near METRO stops. No one was exempt. Vouchers submitted for taxis to locations where transit service was available were not paid.

d. All travelers were required to use the contract air service when possible or to give justification for not using it. Failure to use lowest possible fares resulted in disapproval of future travel requests.

e. Travel advances were to be liquidated by submitting a travel voucher or check within 10 days after travel was completed. This was necessary to keep the travel balance current in view of very limited funds.

Failure to do so resulted in deduction of the advance from the traveler's salary.

f. When a trip or portion of a trip was canceled or part of the ticket was unused, the traveler was responsible for preparing a Standard Form 1170, Redemption of Unused Ticket. Again this was necessary to re-program the funds and keep the travel balance current. Failure to comply resulted in disapproval of future travel requests. The limited resources available to ONAC necessitated firm enforcement of these measures, which were completely reasonable in any case from the taxpayers' standpoint.

Another office management cost savings program introduced during this period was the establishment of a centralized system to control the purchase and distribution of consumable supplies. As a first step, all existing office supplies were consolidated in one location and placed under the responsibility of a single individual. As a second step, a centralized purchasing program was established to control expenditure outlays for all those items. These supply control measures combined with an aggressive cost reduction program resulted in an immediate increase in efficiency of use as well as a realization of significant savings to the Agency. Finally, as a general rule, there were no monies allocated for printing. All exceptions for supplies and printing requests had to be approved in advance by the Deputy Director of ONAC.

MOVING COSTS

General Problems

In addition to the unusual levels of expenditures for accrued leave, and possibly for severance pay, special provision must be made for the cost

of moving furniture, equipment, and materials. The components of that cost include the following:

- a. moving van services, some of which, but not all, may be funded from the budget of the parent agency;
- b. boxes for files, equipment, and materials;
- c. tape, especially binding tape, for sealing boxes as required by archive regulations; and
- d. other shipping services such as local couriers, air express, and parcel post.

Although these items are small in relation to a total budget, they are indispensable.

ONAC's Experience

EPA Headquarters funded the moving van services, and ONAC used more than 1,000 boxes and more than 75 roles of binding tape.

SECTION 9. TRANSFER OF PROGRAM RECORDS TO PROPER LOCATIONS

INTRODUCTION

With the closing of any Government organization comes the task of preserving an appropriate record of the activities in which that organization was engaged. The National Archives and Records Service (NARS) serves Government organizations as a final repository for records, for a limited time or on a permanent basis. This is true whether organizations are in the process of closing or are continuing full operations.

Delivery of records to NARS is an endpoint. Before any materials are delivered, careful scrutiny of agency and NARS recordkeeping requirements must be combined with a comprehensive analysis of the nature of the materials presently held by the organization. This initial review and analysis should provide the basis for a comprehensive plan to deal with the following sub-tasks:

- a. establishing executive access to critical records during the phaseout;
- b. eliminating duplicate records or other materials defined by NARS or agency directives as nonessential;
- c. retaining, organizing, indexing, and shipping of appropriate organizational records; and
- d. maintaining a record of these activities and providing index information and retrieval instructions for future users of these records.

ESTABLISHING EXECUTIVE ACCESS TO CRITICAL RECORDS

General Problem

As the organization's staff dwindles, fewer persons will be responsible for handling the information held by the organization. Moreover, without

careful planning those remaining are less likely to have precise knowledge of the information and its exact location. To a certain extent, this problem can be reduced by organizing and indexing records for shipment at regular intervals. This practice gives the organization several opportunities to reevaluate the utility of its records. However, a certain portion of the organization's records will always remain to facilitate day-to-day operations. The organization must retain its ability to locate and retrieve records, and it must provide some mechanism for the parent agency to do likewise once the organization has closed. Failure to address these issues will cripple the ability of the organization and its parent to function in a responsible way.

ONAC Experience

To ensure access to critical records and to establish priorities for record disposal, ONAC management categorized its records and files into four basic categories:

- a. Technical Reference Center (TRC) materials - records (approximately 600 cubic feet) that were previously indexed with a computerized acquisition number and keyword system;
- b. division files - files (approximately 200 cubic feet) containing division records, project officer files, and contract and regulatory materials, which in general, were integrated by subject area;
- c. ONAC files of record - files consisting of the smallest group of records (approximately 50 cubic feet), including the official, reading, and chronological files of ONAC; and

d. publications and technical documentation - materials of a technical nature produced by or for ONAC, which were reviewed for appropriate dissemination.

The first priority was to close TRC and arrange for shipment of these materials, first to ONAC and then to NARS. It was essential to move these materials from their present site, which had been provided for ONAC as part of a contractual arrangement that was soon to expire. The materials had to be stored temporarily at ONAC until they could be moved to NARS. Appendix F contains a detailed chronology of this activity.

As a result of the announced phaseout of the noise program, it was necessary to close the TRC, which was maintained by the Office to serve as a noise information repository for EPA Headquarters, the various regional offices, state and local governments, and the public. From August 1, 1981 through September 30, 1981, the activities associated with closing of this Center took extensive amounts of time and effort. Because of the severe time constraints associated with this project, the completion of this task was nothing short of remarkable. The multitude of activities involved in this task consisted of the following:

a. reviewing, boxing, and archiving the regulatory support materials, final regulations, draft regulations, and identified noise sources and candidates for proposed rulemaking as well as those areas that had been studied but had not reached the identification stage, all of which were matched up with the project officer's files and shipped to the Federal Records Center (FRC);

b. disposing of the books and periodicals that made up the technical library (some were moved to ONAC to be kept for the duration of the

program before being offered to the EPA library, and some were offered immediately to the library or discarded);

c. disposing of equipment that had been stored at the TRC (the prepared inventory had to be verified and equipment was either moved to ONAC or sent to the EPA warehouse as surplus);

d. disposing of furniture and any miscellaneous supplies that had been stored at the TRC;

e. disposing of boxes belonging to specific individuals within ONAC; and

f. disposing of the paper collection of noise abstracts.

To accomplish all these activities, a detailed plan was prepared. The first order of business was to cull and box all the material pertaining to 17 regulatory areas and then to maintain it onsite at ONAC until work was completed on the regulatory agenda. Major problems immediately became apparent in time, materials, and personnel. Each of these problems was solved with great diplomacy, judgment, and perspective, while under tight time constraints.

For a significant portion of this material, a new EPA filing category was negotiated with the National Archives and seen through the EPA red-border process. Over 600 boxes of material preserved from operation of the noise program over a 10-year period have been expeditiously archived. Additionally, an on-line computer data base management system was assured for the 100,000 plus documents and was made available for future users of this material. The success of this effort has resulted in an annual savings of over \$220,000 to the Agency.

Division files were the next priority for movement. Division chiefs were briefed on EPA and NARS records disposition procedures. Because key personnel were leaving the divisions for other jobs, it was important to emphasize that records had to be properly organized and identified as soon as possible. Files were prepared for shipment, but the file cartons were not sealed so that access could be maintained by ONAC division employees.

Finally, an accounting was made of the location and condition of the official ONAC files, the third priority. It was important to ensure that appropriate copies of official documentation were correctly filed, especially for the sake of future users.

In completing these activities, management was better prepared to access records during the phaseout period; moreover, this effort assisted in further development of the plan for orderly transfer of records. Having categorized and planned for each segment of its records base, ONAC management could provide such information to the Assistant Administrator for Air, Noise, and Radiation and to the EPA Records and Administrative Management Division. In so doing, management was confident that executive access would be maintained beyond the phaseout period.

ELIMINATING UNNEEDED RECORDS

General Problem

Retaining unnecessary records and duplications can become a significant burden for organizations. Limited space is a primary constraint for every organization. In its attempt to transfer program records to other locations (organizations), the closing organization must be mindful of the fact that this constraint applies to the receiving offices.

Ideally, an organization will continually devote attention to the purging of information and records, but few organizations actually make this a sufficiently high priority. Program changes and personnel turnover also help to create unnecessarily voluminous and often disorderly organizational files. This situation is then compounded by the time constraints imposed by a phaseout decision.

ONAC Experience

Although the TRC contained the largest group of ONAC records, management of these materials was enhanced by a computerized index, which permitted project officers to quickly review and eliminate unnecessary items. These items were then removed from the TRC shelves. In addition, the TRC staff removed all duplicate copies and used cross-referencing techniques to avoid filing copies of the same document in several subject areas. Finally, the books in the TRC collection that were determined to be available in other libraries were eliminated from ONAC's records.

ONAC division files, which had no computerized index, were more difficult to handle than the TRC materials. However, their volume was considerably less. ONAC management provided information, coordination, and continual pressure to ensure that staff members would be diligent in the task of purging their files and preparing them for the archives.

Initially, staff members were reluctant to begin this task for several reasons, including:

- a. a lack of enthusiasm for the task of ending the organization they had served;
- b. a lack of appropriate knowledge, since some of the records antedated their employment at ONAC;

c. reluctance to make judgments regarding the value/retention of various materials; and

d. reluctance to surrender their files, guarding against the chance, however slight, that the files would be needed before ONAC closed.

Management sought to address each of these reasons. First, it was stated that work accomplished by ONAC staff was important and worth saving. And if ONAC should be revived, it would be vital that these records be available and usable. Finally, it was stressed that the burden of this task would fall completely on the remaining skeleton staff if the staff members currently on board did not organize their materials before leaving ONAC.

Few staff members were familiar with archiving procedures. Therefore, briefings were held for each division by staff from the Office of EPA Administrative and Records Management. Sorting, organizing, and labeling of information were explained, as were the pertinent and appropriate forms. Specific staff members served as contact points to resolve future questions and to provide materials necessary for preparing records for shipment.

Perhaps the most difficult aspect of the task was the need to make informed judgments as documents were sorted and then eliminated or categorized. Although recordkeeping guides and category descriptions were provided, on occasion it was difficult to discern whether an appropriate document should be retained or how it should be categorized. The staff coordinators sought to resolve such problems by contacting EPA records management officials or by discussing the problem within the division. (Often staff members could combine their records in a more logical fashion, but they would have been unaware of this possibility without such an exchange of information.)

Finally, records prepared for shipment were retained for division use, unless a given series of records was no longer an active topic in the division and the division chief felt it appropriate to release it for shipment. In each of these instances the support and involvement of the division chiefs was critical in accomplishing this segment of the records management task.

ONAC office files were reviewed and inspected to ensure that no gaps occurred in these files. Because these files were smaller, it was determined that they would be maintained at ONAC headquarters until the final days before the closing when they would be shipped either to EPA records management for archiving or to the Assistant Administrator for Air, Noise, and Radiation for final disposition.

RETAINING NEEDED RECORDS

General Problem

As discussed earlier, even as record transfer operations proceed, management must maintain executive access. And, with the phaseout complete, the organization must be able to provide access to future users, which can be provided by a guide (index) to the collection of materials. Anticipation of Freedom of Information Act (FOIA) requests also necessitates such a means of access and retrieval.

Disposition of records to be retained involves a series of procedural activities regarding the transmittal of storage and moving requests; indexing and categorization of records; provisioning of appropriate boxes, labels, and forms; and maintaining receipts/copies of transfer actions to facilitate future retrieval. In planning and coordinating such activities, the organization must be prepared to face delays of various kinds. Although

the organization recognizes the constraint imposed by the limited time available, other organizations with which it must interact may not. Therefore, the organization must act well in advance of the closing to ensure completion of the records transfer task.

ONAC Experience

a. Temporary Storage. As records were categorized and sorted, boxes of material accumulated in ONAC offices. Divisions maintained their growing series of boxes, while TRC files were stored in vacant offices. Because of their volume, the TRC files required considerable space allocation. Time did not permit shipment of the TRC files directly to the archives; moreover, an appropriate item category did not exist for scheduling the entry of these materials into the archives.

b. Red Border Action. Each series of records had to be identified and categorized by an appropriate schedule and item number from the "EPA Records Control Manual" before it could be sent to the archives. To establish a new category (item), coordination of a red border action (an order from the Administrator of EPA) was required to expedite temporary addition of the new schedule item and to secure its permanent addition to the manual pending the concurrence of EPA and NARS. Upon review by officials of NARS and EPA records management, it was determined that the TRC materials required such a red border action. This procedure involved a formal request from ONAC transmitted through the Office of the Assistant Administrator for Air, Noise, and Radiation. ONAC made considerable effort to track the progress of this action through EPA to minimize delay; nevertheless, the clearance took 4 months. Upon agreement by the agency to accept the new item classification, the EPA Office of Records Management negotiated with NARS to

conditionally accept the TRC materials, pending formal addition of the item to the "EPA Records Control Manual."

c. NARS Rules and Procedures. Early in this task ONAC, obtained a copy of the "Records Management Handbook for Federal archives and Records Centers." It contained specifications regarding the use of standard 1-ft³ boxes, packing and sealing guidelines, standard label formats, and the information that labels must include.

Specific attention was paid to the completion of GSA Form 135 and its attachments. This form was completed for each box or series of boxes (up to 50 per series), defining the series by an appropriate item on the records management schedule. An index or description was attached to each Form 135, outlining the contents of each box. TRC materials were indexed by the TRC shelf acquisition number range contained by each box. These records and the Standards and Regulations Division's regulatory materials were then cross-referenced to a computerized data tape that identified materials by acquisition number or keyword input. This tape was scheduled and sent to the archives separately. (The Federal Records Center provides special climate controlled storage for such machine-readable records). Necessary copies of Form 135 and its attachments were made and delivered to the EPA Office of Records Management.

It was important to ensure that rules and procedures were rigorously followed. Upon their receipt by NARS Federal Records Center (FRC) in Suitland, Maryland, boxes would be randomly opened and inspected. If errors were discovered in lots of less than 50 boxes, FRC would return them to EPA. Errors in more than 50 boxes would have required ONAC's presence in Suitland to rectify the situation immediately. Careful planning and cooperation with

NARS and EPA records management staffs prevented such errors and costly delays.

d. Moving and Shipping of Records. The cost of moving and shipping ONAC records to archives was born by the EPA Office of Administrative and Records Management. However, ONAC was responsible for initiating labor services requests and for coordinating these requests with the readiness of boxes and with completion of Form 135. It was also critical to notify building management and to secure the use of freight elevators and loading docks. Routine moves of other organizations in the building and regularly scheduled moving services provided to ONAC (and to other EPA offices) combined to produce potential delays in removing the boxes in a timely fashion. ONAC had to insist, again, that phaseout required priority access to freight elevators and scheduling of extra moving services to handle large shipments of records.

e. Establishing a Record for Future Access and Retrieval. Completed Forms 135 were returned to ONAC indicating the archive location of each group of 50 boxes at FRC's Suitland facility. These forms, with attached indices or descriptions, provided a record that ONAC delivered in its final days to the Assistant Administrator for Air, Noise, and Radiation. A second copy of that record was retained by the EPA Office of Records Management. The information contained in either file will permit future retrieval of a series of boxes, a single box, or, in certain instances, a specific file contained in a given box. Official NARS retrieval forms and instructions were included in that package.

f. Remaining Files. Few files remained at ONAC in its last weeks of operation. Only essential files relating to active topics and ongoing

business were maintained. The remaining files were carefully annotated and then transferred to the Assistant Administrator for Air, Noise, and Radiation.

g. Contractor Support. Researching and coordinating the transfer of records was primarily the responsibility of contract support personnel. They obtained and provided information, forms, and material necessary for the task. They coordinated and managed the closing of the Technical Reference Center and the ONAC library, and they were responsible for scheduling moves and maintaining necessary access to those materials. Because ONAC personnel were leaving, the contractor staff also performed the vital function of retaining the knowledge of how to store and retrieve archives until end of ONAC's operations.

h. Dissemination of Publications and Technical Documents. All publications and technical documents produced by ONAC or by one of its contractors were reviewed to determine which materials should be retained in the files shipped to the FRC or sent to the National Technical Information Service (NTIS). Also, ONAC conducted an inquiry to determine which documents were already available to the public from the EPA library, NTIS, and state and local governments. Copies of materials that were to be made available for dissemination and not already available from the above-mentioned sources were sent to one or more of those sources. NTIS required 12 copies of each document, which it received. That quantity had to be considered in ONAC's plans and budgets.

APPENDIX A. ONAC ORGANIZATION CHART

DIRECTOR*

SCIENTIFIC ASSISTANT**

- o Health & Welfare Studies & Policy
- o Revision of Criteria & Levels Document
- o Relations w/Scientific Community

PLANS AND PROGRAMS STAFF

- o Administration
- o Strategic Studies
- o General Economic Studies

STANDARDS & REGULATIONS DIVISION

TECHNOLOGY & FEDERAL PROGRAMS DIVISION

STATE & LOCAL PROGRAMS DIVISION

Surface Transportation Branch

- o Product Regulations: Buses, Autos, Railroads, Trucks, Motorcycles, Etc. (sections 6, 17, 18)

Aviation & Machinery Technology & Coordination Branch

- o Technology Development and Demonstration
- o Federal Coordination
- o Proposed Aviation Regulation

Technical Assistance Branch

- o Regional Noise Control Programs
- o Monitoring Program
- o Special Legal Determinations (section 17(c)(2), 18(c)(2))

General Products Branch

- o Product Regulations: Construction, Industrial, Consumer (section 6)
- o Labeling (section 8)

Ground Transportation Technology & Coordination Branch

- o Technology Development & Demonstration
- o Federal Coordination

Consumer Information & Airport Assistance Branch

- o Airport Planning Assistance
- o Consumer Information

Demonstration & Evaluation Branch

- o Urban Initiatives

*The title of this position in February 1981 was Deputy Assistant Administrator.

**The title of this position in February 1981 was Scientific Assistant to the Deputy Assistant Administrator.

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APPENDIX B. PHASEOUT PLAN FOR ONAC

(Verbatim Text from Original Document Typed on
U.S. Environmental Protection Agency Letterhead)

MEMORANDUM

SUBJECT: Phase-Out Plans Information and Decision Memorandum

FROM: John M. Ropes
Acting Office Director
Office of Noise Abatement and Control

TO: Mrs. Kathleen M. Bennett
Assistant Administrator for
Air, Noise and Radiation

As we discussed some time ago, I indicated that I would be reporting to you on our progress in the phase-out of the Noise Program. After consultation with senior ONAC staff and with Sam Gutter of OGC, we have arrived at an accelerated plan, subject to your approval, which would permit us to reduce our current staff by approximately one-half by the end of January, 1982. This could provide substantial savings both in terms of extramural dollars and personnel costs. The work that will remain by the end of January could be performed by a core staff that would complete the phase-out of the Noise Program by the end of FY-1982. Of course, this will depend on the outcome of legislative considerations now before the Congress. I have been informed by our Office of Legislation that there has been no movement of the Noise Bill in the House and there probably will be none for some weeks to come.

I instructed the senior staff to advise me of the items in their programs that were essential to accomplish and in what time frame they could be completed. This has been accomplished. I also asked them for alternatives and recommendations on the continuance of certain programs and program elements in an effort to curtail and/or eliminate functions which clearly were not required by law or by the Administrator. Lastly, I asked them to project realistically their staffing needs by quarter during FY-1982. These have also been accomplished.

This has been done with a degree of difficulty since it was necessary to ask people to dismantle programs that they had heretofore tried to build and implement to the best of their ability. In this regard, I have to give the ONAC staff high marks for their cooperation and their ability to face the reality of the phase-out and its personal implications.

Further, the phase-out activity, if it is to be carried out as efficiently as possible, will require a considerable amount of detailing and reassignment of personnel within ONAC. I want to assure you that every effort will be made to take the human factors into account as we proceed. As we get farther down the

road, we are going to suffer some inconvenience as a result of personnel departing to other jobs outside ONAC. This has had and will continue to have an unsettling effect on the operation of the Office; however, it will not hamper our phase-out plan.

Finally, due to the tentative nature of the plan and the decisions that are yet to be made regarding its implementation, I have discussed this plan with senior staff only. Even they do not know the full extent of the plan beyond their own operational units. I believe that we should keep this action as close to the vest as possible until the appropriate time when all decisions have been made.

Following is a unit by unit description of the phase-out plan and staffing estimates for each of the operating units within ONAC:

TECHNOLOGY AND FEDERAL PROGRAMS DIVISION

The principal activities of the Division are currently field research and technology development functions. Coupled with a modest Federal inter-agency activity, they include: the Aviation Noise Program, the Quiet Truck Program, the Quiet Engine Program, the Quiet Tire Program, the Quiet House Program and technical reporting on industrial and construction equipment. The only major activity that will remain after January 31, 1982, is the Aviation Noise Program. All other activities will have been completed, terminated or spun off to other Agencies by that time. The dollar savings from contracts that can be terminated is approximately \$250,000. The staff could be reduced from 6 PFT Professionals, 1 PPT Professional, 2 PFT Secretaries and 1 PPT Secretary to 1 PFT Professional, 1 PPT Professional, and 1 PFT Secretary. Division employees not critical to the remaining functions would be reassigned within ONAC or temporarily reassigned to other EPA units until such time as the Agency determines a date for a Reduction In Force action. Hopefully, we can assist most of the affected staff in finding other employment by that time.

DECISION:

Approved _____ Date _____

Disapproved _____ Date _____

COMMENTS/SUGGESTIONS:

STATE AND LOCAL PROGRAMS DIVISION

The State and Local Programs Division projects its phase-out action to eliminate those functions which are not critical to the effort to pass the program on to the States and locales. This will be accomplished by the end of January. After January, the principal activities of the Division will be: State and local program support, technical assistance and application of program tools such as the Each Community Helps Others (ECHO) Program for States, noise control techniques demonstrations such as Buy Quiet, and coordination and evaluation of State and local programs.

The bulk of the remaining functions are retained to ensure the proper transfer of responsibility for the Noise Program to States and units of local government. In that regard there will be three major activities: 1) Tracking grants and cooperative agreements with States. The cooperative agreements also require substantial Federal involvement which heretofore was provided by the Regional Offices. Since that is no longer possible, Headquarters will have to assume that responsibility until the grants and cooperative agreements expire near the end of FY-1982; 2) Managing contracts and contractors such as the National League of Cities for the National ECHO Program and the National Association of Noise Control Officials offering technical assistance and program development guidance to the States as well as the national "Buy Quiet" Program. These agreements could not, nor should they be, terminated for convenience without creating a major fracture in the transfer of Noise Program responsibilities to the States. As a result, they should be continued until they have completed their contractual requirements; 3) Providing direct technical assistance to States in the areas of program funding, enabling and appropriating legislation and program operations. The major activity in this area is one of problem solving. With less than one year to the end of their Federal financial support, the States will need to be assisted with these aspects of their programs and new levels of responsibility. In essence, this is a primary requisite for full and complete assumption of Noise Program responsibilities by the States.

By the end of January the S&LPD staff could be reduced to 6 PFT Professionals and 1 PFT Secretary from the current 14 PFT Professionals, 3 PFT Secretaries, and 1 PFT Clerk Typist.

DECISION:

Approved _____ Date _____

Disapproved _____ Date _____

COMMENTS/SUGGESTIONS:

PLANS AND PROGRAMS STAFF

The Plans and Programs Staff handles all of the ONAC housekeeping functions and provides assistance to other ONAC units relative to external and non-EPA requirements such as OMB requirements, program analysis and coordination. The staff has already been reduced to its barest minimum and will function with a complement of 3 PFT Professionals and 1 PFT Clerk/Typist until September 30, 1982, when it will be further reduced or eliminated depending on what remains to be accomplished.

DECISIONS:

None needed as remaining staff will be required to accomplish phase down.

COMMENTS/SUGGESTIONS:

SCIENTIFIC ADVISOR AND HEALTH EFFECTS STAFF

The Scientific Advisor to the DAA has departed. The remaining staff is administering health effects projects, some of which are long-term in nature. An in-depth review of those activities is required to determine which of them can be terminated, spun off to another unit of EPA, such as ORD, or continued here at ONAC. The ongoing studies which are of benefit should be retained by the Agency because of their Health and Welfare implications and the impact of these implications as they relate to regulations. We could explore with ORD or other Federal health-related agencies the possibility of assuming responsibility for some of the longer term projects and reassign one or two noise staff members for the duration of those studies or until September 30, 1982. Currently, the staff consists of 2 PFT Professionals, 1 PFT Professional and 1 PFT Secretary.

DECISION:

Approve _____ Date _____
Disapprove _____ Date _____

COMMENTS/SUGGESTIONS:

STANDARDS AND REGULATIONS DIVISION

By far, this is the area of greatest uncertainty. Due to legal responsibilities emanating from the identification of major noise sources, we find ourselves in a position where it will be difficult to extract ourselves quickly. Clearly, some of the regulations in place should be kept, such as the Railroad Regulations, for their pre-emptive value to the regulated industry in light of possible inconsistent State and Local rules. As you know, OGC is now negotiating an agreement with the American Association of Railroads that we hope will settle this unfinished business.

The proposed Bus Regulation likewise poses a problem. Under the present Act, as well as under the Senate and House versions of the proposed legislation, we can be obligated to go forward with rulemaking. Industry is in favor of rulemaking for pre-emptive purposes; on the other hand, States and units of local government would be adversely impacted at this time by the costs of such a rule. The Bus Regulation would apply to equipment purchased for urban mass transit systems and school districts--both of which are in serious financial difficulty. Our cost effectiveness data shows that there are not sizeable per-unit cost increases associated with the proposed Regulation. Further, within the context of the Administration's economic recovery program and the reduction in Federal outlays, States and units of local government will be hard pressed to meet higher priority expenditure needs. Similarly, the Federal Program for Urban Mass Transit will be concentrating more of its resources on capital investment rather than maintenance of equipment thereby exacerbating the problem purchasers will face with respect to maintenance. As is now planned, the overall Federal outlay for Urban Mass Transit will be substantially the same in FY-1983 as in FY-1982. Urban Mass Transit is a highly localized problem with respect to noise where "Buy Quiet" purchase specifications might suffice if urban noise is a problem in a specific community. Likewise, States and units of local government, including school districts, can write "Buy Quiet" purchase specifications for quieter school buses if they perceive bus noise to be a significant problem. To go forward with the Bus Rule would require staff and resources into FY-1983 considerably above the overtarget request made to OMB for the Noise Problem. Therefore, I am recommending that we attempt to de-identify Buses for the same reason(s) we offer in dealing with other products shown on the attached chart. Most likely industry will object for pre-emptive not environmental reasons which in this case is a distortion of the purpose of the Act in my opinion.

With respect to all rules and proposed regulations, we have devised a plan that will de-identify most of the major sources of noise including some of those that have been promulgated. The plan was devised in conjunction with OGC inputs that are subject to your approval. The attached chart outlines the issues/problems and recommendations for implementation of the plan. Since product identification as a major source of noise under Section 5 of the Act initiates the need to regulate and starts the regulatory time clock, withdrawal of those identifications will, theoretically, allow us to disengage from rulemaking at any stage in the process. Where there are regulations that are desirable, those products would not be de-identified. This appears to be the most expeditious as well as the most defensible way to clear out pending actions which we are currently liable for under the law.

Provided that we are successful with the de-identification/de-regulation process the only rules that we would leave in place would be: the Motorcycle Regulation, the Railroad Regulation, Low Noise Emission Products Regulation, the Medium and Heavy Duty Truck Regulation, the Interstate Motor Carrier In-Use Regulation, Portable Air Compressor regulation, and, the Hearing Protector Labeling Regulation. However, the Hearing Protector Labeling Regulation would be eliminated under either version of the proposed legislation, as would the Garbage Truck Regulation, and the Wheel and Crawler Tractor Regulation and Portable Air Compressor Regulation.

The deidentification and deregulation process could take up to 10 months prior to final rulemaking. Critical staff will have to remain until that time. Until the decisions are made regarding the proposed plan, we will not be able to accurately forecast the resource levels needed for the implementation of the plan.

The other critical area of uncertainty is that of the Regulatory Impact Assessments required under Executive Order No. 12291. Many of our responsibilities under the Order emanate from the requirement to develop cost benefit information, which is fairly impossible given the nature of noise regulations. We do have some solid data on cost effectiveness which we are hoping will suffice for regulations that we keep and to which the Order applies. We will relieve ourselves of extensive work and costs under the Order if we proceed with the de-identification/de-regulation plan. If we are successful in negotiating either a waiver or modification of requirements of the Order with OMB (preliminary discussions have taken place), the situation will be eased even further. On the other hand, if we are forced into strict adherence to the Order and we do not implement the plan, we can look forward to preparing costly studies and data coupled with considerable staff allocations beyond FY-1982 just to comply with E.O. 12291. We are preparing a memo for your review and approval requesting the Associate Administrator for Policy and Resource Management to seek OMB approval for us to substitute our cost effectiveness studies in lieu of requirements imposed by E.O. 12291 along with other valid reasons for exemptions to the Order.

One final problem with respect to Standards and Regulations is that of talent drain. With every individual who departs the Agency for a new job elsewhere, we are left with a lack of historical and institutional knowledge regarding in place and proposed regulations. Loss of additional staff could have a debilitating effect on our effort to disengage and extract the Agency from the regulatory activity.

Currently, we have 7 PFT professionals, 1 PFT professional, 2 PFT secretaries and 1 PFT Docket File Clerk assigned to the Division, plus 2 PFT professionals detailed to work there. Our resource needs in this area are governed to a large extent by which version of the new legislation is finally passed, the success and speed of our de-identification efforts, and whether OMB will grant us relief from Executive Order 12291. Even if we are successful in most of these efforts, the current staff will be hard pressed to complete the tasks required by September, 1982. I anticipate reassigning a minimum of three additional professionals to this work as they complete their present projects and become available for other duties. In the long run, however, the situation could

become much worse if we do not move promptly to begin work on the de-identification/de-regulation activities.

RECAPITULATION OF REGULATORY ACTIVITIES

I am proposing that we commence action immediately, with advice and assistance from the Office of General Counsel, to de-identify:

1. Truck Transport Refrigeration Units
2. Power Lawnmowers
3. Rock Drills
4. Pavement Breakers

and that we de-identify and withdraw from further rulemaking activities:

1. Wheel and Crawler Tractors
2. Buses

and further, that we de-identify and de-regulate:

1. Garbage Trucks (Compactors)

DECISION:

Approve _____ Date _____

Disapprove _____ Date _____

COMMENTS/SUGGESTIONS:

In addition, I recommend that we:

- a) Withdraw the Technical Amendment pending on compliance testing on the Motorcycle regulation.
- b) Do no further work on the Hearing Protector Labeling Regulation unless staff time permits.

- c) Do no further work on the Low Noise Emission Products (LNEP) Rule unless staff time permits.

DECISION:

Approve: _____ Date _____

Disapprove: _____ Date _____

COMMENTS/SUGGESTIONS:

If the above actions are successfully consummated the following regulations will be left in place:

- a) Motorcycles (without technical amendment) /1
- b) Medium and Heavy Duty Trucks
- c) Air Compressors
- d) Hearing Protector Labeling (without technical amendment) /2
- e) Interstate Motor Carrier Regulation (in-use operation regulation)
- f) Railroad Regulations /3
 - 1) Locomotive and Railcars
 - 2) Major Source(s)
- g) Low Noise Emission Products (LNEP)
(not actually a product rule but a procedural process)

/1 Eliminated under the Senate version of the new legislation.

/2 Eliminated under both the Senate and House versions of the new legislation.

/3 Pending successful Court settlement with Railroad industry.

Finally, and with respect to most major program activities remaining in ONAC, we have implemented an outreach program in order to accomplish a rational well planned phase-out. The outreach program entails supplying information to those institutions and organizations that can use it and who have expressed a need for the products originating from the work performed by and for ONAC to this time. This includes technical information, contractor reports, documentation, case histories, educational materials and the like to be repositored in one or more locations depending upon arrangements made. The information will be offered to the private sector industry and business, other government agencies, educational institutions, and States and units of local government. We are exploring and will finalize the location of the repository(s) within other units of EPA, National Technical Information Service (NTIS), the National Association of Noise Control Officials, the National League of Cities, and other Federal Departments and Agencies. These activities will require 1 Permanent Full Time professional and 1 Temporary Full Time professional to accomplish by the end of FY-1982.

In conclusion should you have any questions on any of the aspects and implications in this memorandum, I would be very happy to visit with you to discuss them in more depth and detail. I apologize for the length and wordiness of this document but it is most difficult to deal with so many complexities in an abbreviated fashion.

MEMORANDUM

SUBJECT: Further Phase-out Plans Information for ONAC

FROM: John M. Ropes, Acting Office Director
for Noise Control Programs

TO: Kathleen M. Bennett, Assistant Administrator
for Air, Noise and Radiation

As a follow-up to my September 24, 1981 memorandum outlining the general phase-out of the noise office and our subsequent discussions, I would like to now offer additional suggestions for an orderly reduction of activities. In cooperation with the senior staff I have tried to realistically project staffing levels for several different time periods. A detailed schedule is attached for your examination.

I think we can reach the January 1982 projected strength level for PFTE without a reduction-in-force if those individuals eligible for an immediate annuity retire and the attrition rate continues at the current level. We can go from our October 1, 1981 strength of 39.5 PFTE and 11.5 OPFTE to a January 30, 1982 end strength of 29.5 PFTE. As soon as the Agency completes negotiations with the union relative to the procedural aspects of the reduction-in-force process, we will issue RIF notices to all individuals classified as OPFTE. If this can be completed by the end of January 1982 this will leave us with an end strength in this category of zero. As you can see from the attached table, we anticipate that we will lose a total of 10 PFTE people between October 1, 1981 and January 31, 1982; 5 through attrition and 5 through retirement. Additionally, 11.5 OPFTE positions will be abolished through reduction-in-force procedures. If it becomes obvious that we are going to miss our mark significantly in our projected strength decrease, reduction-in-force notices can be issued to bring us down to the appropriate strength level. Hopefully, this will not be necessary.

The needed end strength of the office as of June 30, 1982 is projected to be 18 PFTE. As you can see from the attached table most of the activity will be concentrated in the Standards and Regulations Division and the State and Local Programs Division: the former group continuing to work largely on de-regulation and the latter on transferring all noise control activities to the State and local governments. If we miss this target strength decrease of 12 people, reduction-in-force notices can be issued to bring us down to the appropriate strength level. Again, we are hopeful that this will not be necessary. If we can achieve projected reductions by June 30 without having to resort to a RIF, I would be more concerned with the proper mix of personnel remaining than the absolute numbers involved.

Most activities of the Technology and Federal Programs Division are scheduled to be either terminated, spun off to other agencies, or completed by the end of January 1982. The only major activities that will remain after this date will be the aviation noise program, the quiet engine program and the quiet tire program. In January all employees not essential to remaining functions will either be reassigned to other ongoing activities within the office or their positions will be abolished.

The Science Assistance Staff will have terminated all technical assistance, special projects, and standardization activities by January 1982 and should be down to 2 FTE. If they are not at the projected level the surplus position will be abolished and a reduction-in-force notice issued. The balance of research studies remaining will be handed off to various organizations for completion as soon as feasible: the construction site survey; the epidemiological study; replication of the primate study; human experimental study; effects of noise on sleep; the University of Miami primate study; Fels longitudinal study; and the national health survey data analysis.

The bulk of the remaining activities will be concentrated in the State and Local Programs Division and the Standards and Regulations Division. Within the State and Local Programs Division functions which are not critical to the effort to pass the program responsibility to the States and local governments will be completed by the end of January 1982. At that time all employees not essential to the remaining functions will be either reassigned to other ongoing activities or their positions will be abolished. For the balance of FY 1982 there will remain three ongoing activities: tracking grants and cooperative agreements with States; managing the National ECHO program, the NANCO technical assistance program, and the "Buy Quiet" program; and providing direct technical assistance to States as they assume full responsibility for the noise programs. The Standards and Regulations Division's efforts will be conducted mainly in the de-regulatory areas that I discussed in my September 24, 1981 memo to you. Unlike the other parts of the office, our main concern here is to retain personnel that are experienced in the regulatory area for as long as possible in order to complete the de-regulatory effort.

All remaining personnel will need to receive formal reduction-in-force notification by September 1, 1982, in order for us to have an end strength of zero on October 1, 1982. Every possible effort will be made to assist personnel in obtaining other employment. We can expect a great deal of inconvenience to our operations as individuals depart, but this is expected in a final phase-out. Additional details and reassignments will be required as we complete our phase-out.

If you should have any questions relative to this plan, I would be happy to visit with you and discuss them in greater detail.

Attachment

APPENDIX C. STATUS REPORT TO THE AMERICAN STANDARDS INSTITUTE'S
ACOUSTICS STANDARDS BOARD (MAY 6, 1982) EPA'S
NOISE REGULATORY PROGRAM PHASEOUT

(Verbatim Text from Original Document Typed on
U.S. Environmental Protection Agency Letterhead)

In mid February of 1981, EPA's Noise Office was informed that the Administrator had recommended to the President that in view of tight Agency budget constraints and in keeping with the President's new Federalism policy, that the Office be closed by September 30, 1982. In keeping with this recommendation the Administrator requested a minimum budget for Fiscal Year (FY) '82 for the Noise Office and zero budget in FY '83.

The formal phaseout program of the Noise Office, has been underway since August of 1981. It's main thrust has been directed toward transferring, to the extent possible, Federal programs to State and local governments, and to effect resolution of noise regulatory activities that were in various stages of development. The phaseout has been accompanied by a substantial reduction in ONAC staff (from 92 to the present level of 15 members).

The phaseout status of State and local programs has been well addressed in acoustic/noise news letters, journals and other media.

This status report is limited to the Federal noise regulatory phaseout which, I believe, has a direct bearing on the program planning and activities of ANSI's Acoustics Standards Board.

At the beginning of phaseout the Agency's incomplete noise regulatory actions consisted of proposed noise emission regulations for wheel and crawler tractors, buses, railroad refrigeration cars, and a railyard property line noise level. In addition, the Agency had identified power lawn mowers, truck transport refrigeration units, pavement breakers and rock drills as major sources of noise for which it intended to develop noise emission standards. Also pending was a decision to further defer the effective date of the 80 dB medium and heavy truck regulation; the decision to rescind the enforcement requirements for production verification, recordkeeping and reporting; and to a final resolution of the testing requirements attendant to the truck mounted solid waste compactor regulation (enforcement had been suspended until technical issues were resolved).

As of this date, the Office of Noise Abatement and Control has completed its review of all outstanding regulatory actions and is at various stages of submitting recommendations to Administrator Gorsuch for the appropriate resolution of these regulatory issues. Although final decisions have not yet been made, I think we can share with you some of the recommendations we are making to the Administrator.

(1) On November 26, 1981 the United States District Court of Appeals for D.C., dismissed the legal suit which the American Association of Railroads had filed requesting additional regulation to preempt State and local actions. The

court dismissal terminates the Agency's obligation to issue final regulations for railyard property line noise levels and refrigerator car noise levels. We are recommending the withdrawal of these two proposed regulations;

(2) At the time the final motorcycle and motorcycle exhaust system regulation was promulgated, the Agency also proposed to amend the compliance test procedure to require manufacturers to remove all "easily removable" noise attenuating components from mufflers in exhaust systems, prior to compliance testing. The intent was to encourage manufacturers to incorporate permanently fixed components and exhaust systems thereby discouraging field modification by users. Subsequent to this proposal we learned of a potential conflict with U.S. Forestry Service maintenance requirements for off-road bikes which require disassembly of exhaust systems to clean spark arrestors and other components. Further, we concluded that existing anti-tampering requirements in the regulation should provide adequate safeguards against extensive field alterations of exhaust systems. If it is found that additional deterrence is necessary, actions can best be effected by concerned State and local governments. Consequently, we are recommending that the proposed test amendment be withdrawn;

(3) In light of the depressed economic conditions existing in the construction equipment and motor vehicle industries we are recommending that the proposed rules for buses and wheel and crawler tractors be withdrawn. We believe that any adverse environmental effects arising from the absence of Federal regulation can be mitigated by State and local programs.

(4) In view of limited Agency resources and the closing of the Noise Office, we are recommending that buses, wheel and crawler tractors, power lawn mowers, truck transport refrigeration units, pavement breakers, and rock drills be removed from the Agency's report of major noise sources, for which it intended to develop regulations. However, these products are still considered major sources of environmental noise and under the present Noise Control Act, they remain candidates for possible future regulation if appropriate.

(5) The Noise Office is currently exploring the feasibility of modifying the Interstate Motor Carrier regulation to bring in-use noise limits for medium and heavy trucks, manufactured after January 1978, into alignment with the existing standards for newly manufactured trucks.

(6) The rescission of compliance recordkeeping and reporting requirements is in the final stage of preparation. We are also recommending that in the absence of these two requirements, the Agency also rescind the Production Verification Test requirement which formed the basis for the record and reporting requirements. The retention of Selective Enforcement Audits, testing by the Administrator, and compliance labeling requirements are believed to be adequate for manufacturer compliance.

(7) On February 16, 1982, the Administrator deferred the effective date of the medium and heavy truck 80 dB noise standard to January 1, 1986.

Finally, the closing of the Noise Office and the subsequent transfer of regulatory initiatives to State and local jurisdictions places a significantly increased responsibility upon the voluntary standards community and particularly

on the Acoustics Standards Board. The harmonization or alignment of product noise test standards was emerging as a key responsibility of EPA's noise regulatory office. The increasingly serious problem of technical barriers to trade exists on both a national and international plane. It can most effectively be handled by persons who understand both the technical and political problems. In the absence of EPA's Noise Office, this responsibility rests squarely with the voluntary standards community.

Appendix D. MEMORANDUM REGARDING CLOSEOUT OF A CONTRACT AND
USE OF A STANDARD CONTRACT SYNOPSIS FORM

(Verbatim Text from Original Document Typed on
U.S. Environmental Protection Agency Letterhead)

MEMORANDUM

Date :

Subject: Contract Close Out

From : John M. Ropas, Acting Office Director
for Noise Control Programs (ANR-471)

To : Casey Caccavari
Kenneth Feith
Jeff Goldstein
Rodney Jenkins

Attached for your information and use is a list of contracts for your division that have not been closed out by the EPA Contracts Division.

It is the responsibility of each Division Director to ensure that all contracts that are the responsibility of his division are closed out properly. If the Project Manager listed has left your division, it is your responsibility to contact the Project Manager for an appropriate close out or, if unable to contact the Project Manager, to take whatever action is necessary yourself to close out the contract. EPA will not be able to audit any contracts in the foreseeable future so close out actions will need to be completed on each contract up to the final audit stage.

Since it is highly probable that someone who is not the original Project Officer will ultimately complete the final sign off on these contracts, it is important to leave a detailed contract synopsis that can be used by the individual given signature responsibility to ascertain whether the contract has been successfully completed and all obligations are met.

Attached is a sample format to be used in writing these synopses. Each and every contract must have such a document prepared.

This is a high priority item. Staff members are leaving rapidly and we must complete the task of contract close out while we still have personnel on board with institutional knowledge.

Please forward a duplicate copy of each synopsis plus a cover memo providing a status report with a full explanation as to any deficiencies to my office by COB November 18, 1981.

Attachments

CONTRACT SYNOPSIS

1. Contract Number
2. Name and Address of Contractor
3. Title of Project
4. Name of Project Officer (include office, division, and branch)
5. Summary of contract:
Objectives and Requirements of Contract

Outstanding Task or Deliverables

If tasks or deliverables are not completed, please give a detailed summary of what remains to be done or delivered and due dates associated with each item.

6. List any equipment in Contractor's possession either Government owned or purchased with contract funds.

7. Is Project Officer's Evaluation of Contractor Performance (EPA Form 1900-27) completed? [] Yes [] No

If response is no, please explain why not.

Appendix E. MEMORANDUM REGARDING THE TRANSFER OF ONAC CONTRACTS

(Verbatim Text from Original Document Typed on
U.S. Environmental Protection Agency Letterhead)

MEMORANDUM

Date : October 22, 1981

Subject: Transfer of EPA Contracts to Other Government Agencies

From : W. Don Franklin, Director
Plans and Programs Staff

To : John M. Ropes, Acting Office Director
for Noise Control Programs (ANR-471)

I talked with Mr. James Kranda of the EPA Contracts Office on October 22, 1981, relative to the procedures to be used for the possible transfer of several EPA contracts to the responsibility of other Government agencies. He indicated that there were several steps in the process:

a. Write a memorandum to the EPA Contracts Office with the following information:

- (1) EPA Contract Number
- (2) Identification of gaining agency
- (3) Name of gaining contracts office
- (4) Name of gaining Project Officer

b. Attach a formal acceptance letter to the memorandum from the gaining agency indicating they will accept responsibility for the contract.

c. Indicate in the memorandum to EPA Contracts whether an attempt will be made to get value back from the gaining agency (will they reimburse EPA for EPA funds expended). In all probability this will be a negative statement.

When this is forwarded to EPA Contracts, they will issue a modification to the contract transferring responsibility to the gaining agency.

Appendix F. SAMPLE LETTER FROM A GAINING AGENCY REGARDING
TRANSFER OF AN ONAC CONTRACT

(Verbatim Text from Original Document Typed on U.S. Department of
Transportation, Federal Highway Administration Letterhead)

HRS-42

Mr. John Ropes
Acting Director
Office of Noise Abatement and Control
Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Ropes:

Following discussions with Mr. Daman Gray of your office I have asked Mr. Fred Romano to assist Mr. Gray as necessary with completion of the contract with Wyle Laboratories, Development and Demonstration of Quiet Truck Tires.

In the event that the Office of Noise Abatement and Control is unable to complete management of the contract because of organizational changes, Mr. Romano will accept responsibility as contract manager and, together with the Environmental Protection Agency contracting office, conclude the contract work as agreed to by the Environmental Protection Agency and Wyle Laboratories. It is understood that the Federal Highway Administration will not contribute funds in support of the work or agree to extension of the contract in any form.

I hope that Mr. Romano can be of assistance to you in accomplishing a successful completion of this worthwhile research effort.

Sincerely yours,

David Solomon
Chief, Environmental Division

APPENDIX G. CLOSING THE TECHNICAL REFERENCE CENTER: A DETAILED CHRONOLOGY

INTRODUCTION

From August 7, 1981 through September 30, 1981, ONAC, with the assistance of the management support contractor, completed the closing of the Technical Reference Center (TRC). This chronology documents those efforts; the discussion that follows presents the tasks accomplished as well as the problems encountered.

ORIGINAL OUTLINE OF WORK

On August 7, the director of the ONAC plans and programs staff made the decision to close the TRC. Until then, it was thought that ONAC personnel would be available to do the work, but with reduced ONAC staff and pressing time demands, the TRC tasks were assigned to the management support contractor. The following tasks were envisioned on August 7:

a. pulling, boxing, and archiving the regulatory support materials, consisting of final regulations, draft regulations, identified noise sources and candidates for proposed rulemaking (under section 5B(1) of the Noise Control Act), and those areas that had been studied, but had not progressed to the identification stage (the materials were to be matched with the project officer's files and eventually shipped to the Federal Records Center (FRC), and the remaining holdings were to be boxed in acquisition number order for shipment to the FRC;

b. disposing of the books and periodicals that made up the technical library some of which were to be moved to ONAC and kept for the duration of the program and then to be offered to the EPA library and others to be offered immediately to the library or discarded if unwanted;

c. disposing of equipment that had been stored at the TRC including verifying an inventory prepared by the contractor that ran the TRC and either moving the equipment to ONAC or sending it to the EPA warehouse as surplus;

d. disposing of furniture and miscellaneous supplies that had been stored at the TRC; and

e. disposing of both the collection of "Noise Abstracts" and the boxes containing personal materials belonging to specifically named individuals within ONAC.

At this point the volume of material could not be estimated. Mr. Harold Webster of the EPA Records Management Division was identified as the authority on how to do the work but as of August 7, no details had been worked out with his office.

No detailed planning and scheduling for those tasks had been done. Each of the tasks required that numerous details be addressed in an expeditious manner. When the management support contractor began these tasks on August 10, no work had been accomplished, nor had information for planning purposes been collected, except for the general information discussed above.

PERSONAL BOXES AND NOISE ABSTRACTS

To create some usable work space, one of the first efforts the contractor undertook was to determine the disposition of personal boxes and paper copies of the "Noise Abstracts." On August 11, the four individuals who had stored approximately 25 large boxes of materials in the TRC were notified that they should review the contents of those boxes and indicate whether the materials could be discarded. When they had not been reviewed by August 13, the contractor moved the boxes to ONAC and distributed them among their owners; on that same day, 17 boxes of "Noise Abstracts" were also moved to ONAC. On the

19th, the management team learned that the abstracts had little usefulness and requested permission to discard them; authorization to do so was received on the 20th.

In addition to opening valuable work space for other efforts, this prompt action enabled the return of personal boxes to two individuals who were about to leave ONAC. Thus, no employee unfamiliar with the materials had to assume responsibility for them.

REFERENCE LIBRARY BOOKS AND PERIODICALS

Before the August 7 action initiating the TRC closing activities, four decisions were made by the Deputy Assistant Administrator (DAA) of EPA.

- a. All hardbound reference books were to be moved to ONAC for the duration of the noise program. Ultimately they were to be offered to the EPA library or to an area university.
- b. Eighty-two sets of periodicals were to be kept and moved to ONAC.
- c. One hundred and fifty-one sets of periodicals were to be offered to the EPA library and discarded if unwanted.
- d. Twenty-seven boxes of extra copies of ONAC reports, pamphlets, and brochures were to be brought to ONAC to be used in response to public requests for noise information.

ONAC arranged to have Ms. Sami Klein, the EPA librarian, visit the TRC on August 18. She reviewed the collection of books and periodicals and shortly thereafter informed ONAC of the periodicals that the library could use. ONAC complied with her requests and also provided her with four boxes of miscellaneous EPA reports (one copy of each); the remaining 23 boxes of reports, pamphlets, and brochures were moved to ONAC.

On August 20, all unwanted periodicals were discarded. The remaining collection of books and periodicals, along with the necessary bookcases, were moved, incrementally, to ONAC on August 20 and September 1, 18, and 22. (The collection had to be moved incrementally because of space constraints within ONAC and the need for avoiding disruption of the TRC contractor's work on the regulatory support materials.)

In a memorandum dated September 23, the management support contractor informed ONAC that the moving of the library had been completed; this management team offered several suggestions regarding the security, use, and final disposition of the library materials.

REGULATORY SUPPORT MATERIALS

Scheduling and Monitoring Progress

No schedule of actions necessary to complete the task existed before August 7; ONAC had made no estimate of whether the effort could be completed on schedule if the work continued at its current rate. Therefore, one of the first tasks undertaken was to plot the work required against the time available and to make the necessary determinations of work effort required.

On August 14, the first plot (a milestone chart) was completed. It indicated that if the contractor operating the TRC facility continued its tasks at the current rate, collecting and boxing of all 27 regulatory areas would run too close to the September 30 deadline to allow for unexpected complications. Therefore, a second schedule was plotted allocating twice the manpower; it provided for completion of the work with an adequate margin for unforeseen problems.

Both schedules were presented at an August 18 meeting attended by the project officer, representatives of the Standards and Regulations Division

(S&RD), the TRC contractor, the ONAC management support contractor, and the Director of ONAC. During the discussion of these two schedules, it became apparent to all that the TRC contractor and S&RD were not in agreement on the scope of work--the TRC contractor insisting that only 14 regulatory areas were to be culled from the collection according to the contract and other binding agreements, and the S&RD personnel expecting 27 areas to be collected. It took several days of negotiation to resolve that problem.

By September 8, compromise had been reached. It stipulated that the TRC contractor would collect information for the 10 regulatory areas specifically stated in its contract and for the four additional areas that it had verbally agreed to produce but which were not identified by the contract. The contractor also agreed to box and label three other areas not listed in the contract for which it had already done most of the collection work. The remaining 10 regulatory areas would not be collected by anyone. Therefore, ONAC was able to establish a schedule for completion that was satisfactory to the TRC contractor and permitted ONAC to monitor their progress in sufficient detail.

Acquiring Supplies

The contract with the TRC operator required the Government to provide all necessary supplies for the effort, including boxes, labels, and sealing tape (per FRC specifications). ONAC's fiscal year (FY) 81 funding constraints precluded normal acquisition of those items from the General Services Administration (GSA) store. Therefore, ONAC had to resort to ingenuity and persuasion to obtain the necessary supplies. It worked out an agreement to acquire the boxes and labels from the GSA store in FY 81, using FY 1982 funds; the management contractor acquired the tape from other sources. Thus, ONAC was

able to keep the TRC contractor supplied with the necessary materials and so prevented the possibility of its not meeting the deadline for lack of supplies.

Representing ONAC to EPA Records Management Division and National Archives

Although Mr. Harold Webster of the EPA Records Management Division had met with ONAC representatives before involvement by the ONAC management support contractor, little more than the wording of the labels for the regulatory areas had been settled. Therefore, on August 20, this management support team met with Mr. Webster to learn the exact details of boxing, labeling, and archiving the 17 areas of specific regulatory support materials. On August 26, a memorandum was prepared for the project officer's signature that explained to all the ONAC staff the requirements for having material accepted by the Federal Records Center (FRC).

On September 14, it became apparent to ONAC that the material remaining after the 17 regulatory areas had been collected would be huge. Heretofore, all involved within ONAC had underestimated its volume. As soon as it recognized the error of previous estimates, ONAC also became aware that earlier procedures applicable to the regulatory areas were not appropriate.

The management contractor arranged for Mr. Tom Tasker to visit the TRC on September 18 and explained the problem to him. On September 30, the management contractor represented ONAC in a meeting with Ms. Rita Wolfinger of the National Archives, again, explaining in detail the problem and ONAC's recommendations for a mutually satisfactory solution.

On September 24, Mr. Tasker informed ONAC that a new category to cover this extra material had been tentatively approved and that he was beginning the process of obtaining formal approval (by means of a red border action). On October 13, ONAC obtained from Mr. Tasker the red border approval form and,

in turn, transmitted it to the Assistant Administrator for Air, Noise, and Radiation.

Actual Moving

The management contractor and the moving contractor moved the boxes of records from the TRC to ONAC. The records of the 17 regulatory areas were moved as they were completed by the TRC contractor; this move coincided with the moving of the remaining library materials. The remaining 600 boxes of material not categorized by regulatory area were moved on September 24 and 29.

During those moves, as well as all others, it was vital to coordinate access to the loading docks and use of the freight elevators in both the TRC and ONAC buildings with the building managers. On more than one occasion, those well-planned efforts were disrupted by uncooperative security guards, tardy maintenance engineers, and rival moving crews. ONAC was frequently forced to use extraordinary measures to ensure the success of the move.

Indexing and Copying

The content of the TRC regulatory support materials are described in 15,601 pages of computer printouts, the results of a search of the entire data base by regulatory subject area. Those pages represent a detailed index of archived material required by the FRC and the National Archives. The plan agreed upon by ONAC and FRC was to place the index for each of the regulatory areas in the last box of the series for a particular regulated product.

As early as July 15, ONAC personnel realized that if the original computer printout was archived with the records, there would be no reference copy remaining at ONAC. Accordingly, on that date, ONAC requested that its management contractor obtain quotes from area vendors who could copy the material. Two quotes were provided to ONAC within a week of the request.

On September 17, as the first regulatory subject area (two boxes of records on the earthmoving equipment regulation) was being prepared for archiving, ONAC realized that no copy of any of the printouts had been made. Therefore, arrangements were made for the copying. On October 1, the printouts were turned over to a copy vendor; the originals and the copies were returned to ONAC on October 9. The indexes were returned to their respective sets of regulatory material; the copies were stored in the temporary ONAC library for safekeeping until needed for reference.

Extension of the Data Base Management Contract

A third contractor involved in the TRC activities maintained the data base management system for the records of the 100,000-plus documents that composed the TRC noise information collection. According to the terms of its contract with ONAC, the data base contractor was to have turned over to ONAC the magnetic computer tape containing all of the records on September 16, two weeks before the end of the contract performance period. Once this had been done, it would have proved virtually impossible to obtain additional computer searches of the data base. And these computer searches might have been required if the FRC would have imposed additional requirements before it would accept the collection for archiving or for ONAC to respond to requests made under the Freedom of Information Act.

On September 11, the management contractor suggested that orders for any final computer searches be executed.

On September 14, ONAC directed that efforts be made to extend the agreement with the data base contractor at no additional cost to the Government. Also, ONAC sought to determine whether a previously submitted \$8,500 addition to this contract had been completely processed by the contracting officer.

In a September 15 meeting with the contracting officer, Mr. David Watson, ONAC learned that the data base management contract had been deactivated, but not terminated, as a result of the DAA's direction in June 1981 and that the \$8,500 addition to the contract, which was generated 3 weeks after the DAA's deactivation directive, had not been processed.

On September 17, ONAC delivered to the contracting office a memorandum of clarification that requested that the \$8,500 addition be processed and that the contract period of performance be extended through September 30, 1982. ONAC followed up this action with daily telephone calls to the contracting officer in an attempt to impress Mr. Watson with the urgency of the matter.

Those efforts proved successful. On September 30, according to Mr. Watson, modifications to the contract were executed; those modifications extended the performance period through FY 82 and increased the contract amount by \$8,500. That action provided ONAC with a data processing capability to respond to unexpected requests for searches or sorts by the FRC or by others under the Freedom of Information Act.

TRC EQUIPMENT DISPOSAL

As part of its contract with ONAC, the TRC contractor was required to prepare an inventory of all Government-owned equipment and furniture that had been stored at TRC. This inventory was delivered to ONAC on May 18.

The management support team verified the accuracy of that inventory and uncovered nine additional items of significance that had been stored in unlikely areas of TRC. All items were assigned ONAC control numbers for tracking and documentation purposes. The management team then developed a data base for all ONAC equipment records on a Lanier data/word processor and maintained status and disposition records for the equipment, using that data base.

When the EPA Office of Enforcement Policy, a newly established organization, learned of the TRC closeout effort, it requested that it be permitted to receive any excess equipment for which it had a use. The ONAC team complied.

By September 30, ONAC had completed all necessary documentation for the moving, transferring, or surplussing of the equipment and effected the following dispositions:

- a. three items of equipment were moved to ONAC;
- b. 14 items of equipment, along with 16 consumable/miscellaneous items, were transferred to the Office of Enforcement Policy; and
- c. 23 items of equipment were sent to the EPA warehouse as surplus.

For other major moves, a professional moving contractor was hired. Regular, full-time management contractor staff members assisted in and supervised all phases of the moving operations. The efforts also required coordination of access to loading docks, use of freight elevators, preparedness of the EPA warehouse for receipt of the items, and other necessary actions for ensuring success of the moving process.

DISPOSAL OF TRC FURNITURE AND SUPPLIES

As was done with the equipment, the management support team verified the accuracy of the inventory of furniture and supplies prepared by the TRC contractor; they also assigned control numbers and maintained status and disposition records. In addition, the team prepared all necessary documentation for disposition of those items.

Three separate activities were required to dispose of all of the furniture and supplies in the TRC. Seventeen bookcases for the library and three bookcases for the Technology and Federal Programs Division were incrementally moved to ONAC as part of the library effort previously discussed. In early

September, 31 items (desks, chairs, tables, and file cabinets) were sent to the EPA Warehouse as surplus; these were picked up incrementally by EPA movers between September 4 and 14. Because of their space and scheduling constraints, the EPA movers were unable to pick up all 31 items at once. In all they made three separate visits to collect that material. That, of course, required that the access to the loading dock and use of the freight elevators be coordinated on three separate occasions. On September 30, the third activity involved the moving of the following items:

a. 36 large items (bookcases, file cabinets, etc.), 114 stackable shelving units, and approximately 50 loose metal shelves, which were all sent to the EPA warehouse as surplus (several of the bookcases had to be unbolted from the walls and completely disassembled before they could be moved) and

b. all remaining supplies (consumables, stamps, miscellaneous office tools such as staplers and scissors, etc.), which were moved to ONAC.

These efforts were also performed by the management contractor and a moving contractor. Because of the ever-present elevator and loading dock problems, the moving van was always loaded for its final trip to the EPA warehouse no later than 3:30 p.m., which was the absolute deadline for the work to be completed at the TRC facility and still allow a timely delivery at the EPA warehouse before that day's closing.

WRAP-UP EFFORTS

On October 1, the team prepared formal memoranda between ONAC and the TRC contractor that listed all items removed from the TRC on September 29 and 30 and that stated the TRC was officially closed, both parties having fulfilled their obligations under this contract.