



Florida Department of Environmental Protection
OFFICE OF INSPECTOR GENERAL
Program Review & Improvement



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Southwest District Air Program Management Review

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OVERVIEW

A Management Review of the Southwest District (SWD) Air Program (Program) was conducted June 14 – 16, 2010 at the request of Law Enforcement Major Roy C. Dickey, acting as Interim Inspector General, based on reports generated by the Division of Air Resource Management (DARM) that suggested disproportionately high enforcement case backlogs in the SWD compared to other Air Program districts.

The review included an examination of Southwest District Air Program policies and procedures as well as interviews with SWD Air Program staff (the findings in this report based on interviews represent a majority of the opinions expressed by 21 employees and 3 supervisors interviewed).

In addition, this management review included examinations of the processes of other DEP District Air Programs as well as interviews with personnel assigned to the other Districts as deemed necessary in order to form an independent and objective opinion as to whether the processes of the SWD Air Program were comparable to those of other DEP Districts.

We also interviewed management staff assigned to the Division of Air Resource Management in Tallahassee to gather information with respect to the management of Air Programs Department-wide.

We found the management goals of the SWD Air Program to be generally sound. The major exception we noted was the number of unresolved enforcement cases. The SWD was responsible for 12 of 13 cases that had exceeded the 270 day limit for closure allowed by the U.S. Environmental Protection Agency (EPA). We believe the probable root causes for the enforcement case back log were (in descending order of importance):

- Lack of a well-defined Management Plan
- Lack of a well-defined Change Plan for operational changes introduced by the SWD Program Administrator (PA)
- Poor communication on the part of Program management
- Too slow a pace for execution of Program changes

We also noted low employee satisfaction with management practices expressed by SWD staff during personal interviews conducted in the field compared to other District Air Programs. We believe that the probable root causes for low employee satisfaction were (in descending order of importance):

- Management practices and style at the Program and Section level
- Pre-existing staff perceptions and issues created by prior Program management that pre-dated the assignment of the current Program Administrator.

The summary conclusion we have reached with respect to the current situation is that failure of SWD Air Program management to effectively manage these issues may have damaged the reputation of the Department with the local regulated community and federal regulatory agency (EPA). It will also be difficult for Program management to carry out its management plan, to conduct operations in an efficient and effective manner, or to increase employee satisfaction without intervention by the District Director.

In addition, we recommend possible mediation by an acceptable third party. The goal of such mediation should be to obtain staff “buy-in” for the operational changes needed to align SWD Air Program operations more closely with the Air Programs of other DEP Districts, which place a greater emphasis on expediency; risk assessment, prioritization, and open communication with staff to achieve their mission and manage enforcement case loads.

SCOPE AND OBJECTIVES

Scope

The nature and scope of the management review were agreed upon with the Inspector General, and are intended to add value, result in reduced expense and improve the governance, risk management, controls, and processes of the Florida Department of Environmental Protection (DEP).

The focus of this report is limited to the management practices of the SWD Air Program and evaluation of concerns expressed by SWD staff in communication with the DEP Bureau of Personnel Services and Office of Inspector General.

Objectives

The objectives of the management review are as follows:

1. To form an independent and objective opinion as to whether SWD Air Program management goals are being met and that the Program is managed in an efficient and effective manner that is conducive to organizational success.
2. To identify the probable root cause(s) of negative comments made by SWD Air Program staff with respect to management practices.

METHODOLOGY

This management review was conducted under the authority of Section 20.055, Florida Statutes (F.S.). The review was conducted according to the *International Standards for the Professional Practice of Internal Auditing*, published by the Institute of Internal Auditors. The review included an examination of Southwest District Air Program policies and procedures as well as interviews with SWD Air Program staff (the findings in this report based on interviews represent a majority of the opinions expressed by 21 employees and 3 supervisors interviewed).

In addition, this management review included examinations of the processes of other DEP District Air Programs as well as interviews with personnel assigned to the other Districts as deemed necessary in order to form an independent and objective opinion as to whether the processes of the SWD Air Program were comparable to those of other DEP Districts.

We also interviewed management staff assigned to the Division of Air Resource Management in Tallahassee to gather information with respect to the management of Air Programs Department-wide.

SURVEY OF BACKGROUND INFORMATION

The Southwest District Air Program regulates sources of air pollution in 11 Florida counties (Citrus, Desoto, Hardee, Hernando, Hillsborough, Manatee, Pasco, Pinellas, Polk, Sarasota, and Sumter) plus the western portion of Marion County. The predominant industries regulated in the Southwest District are engaged in the production of phosphate agricultural products, citrus products, and electrical power. The SWD is assisted in its endeavors to protect, maintain, and enhance air quality by approved local air programs in Hillsborough, Pinellas, Manatee and Sarasota Counties. The approved local air programs administer state air pollution-related activities under various agreements with DEP. The SWD and local programs work together to ensure that state and federal air requirements are met.

The Program is organized into three sections: Permitting, Compliance, and Enforcement and Ambient Air Monitoring. Functions related to Transportation Air Quality are performed within the permitting section. The Air Resources Management System (ARMS) database is used to store information about permitted facilities.

Air Permitting Section

The primary purpose of the Air Permitting Section is to review applications for completeness, request additional information if required, and prepare the final permit for issuance or denial.

The Southwest District is responsible for processing all construction permit applications involving emissions of up to 250 tons per year of a single pollutant and all operating permits in the District except major electric power generating facilities (processed by the Bureau of Air Regulation in Tallahassee). Delegated source permits are issued by the air programs at the Hillsborough County Environmental Protection Commission and Sarasota County Natural Resources Department.

Transportation Air Quality is another component of the Permitting Section. Staff serves as voting or advisory members to Metropolitan Planning Organizations' Technical.

Compliance Section

The Compliance Section's primary duty is to ensure stationary point sources meet state and federal air rules and regulations. Compliance engineers perform inspections on these sources, audit the conduct and results of tests performed to measure compliance with emissions limits, collect data on facility operations and emissions, and investigate complaints. The predominant industries in the Southwest District are engaged in the production of phosphate agricultural products, citrus products, and electrical power.

Enforcement and Ambient Air Monitoring

Sources not meeting permit conditions or rules are referred to the Enforcement and Ambient Air Monitoring Section. Appropriate actions may include an informal Warning Notice or a formal Notice of Violation and ultimate entry into a consent agreement. Consent agreements may include monetary (fines) and non-monetary penalties (such as establishing a public environmental education program).

An important activity of the Southwest District is its response to citizen complaints. Due to the large increase in population within the District, individuals sometimes face air quality issues and have air pollution concerns. Typical complaints range from odors and open burning to particulate fallout. After a complaint is logged, staff normally investigates it within three working days. Once the investigator has gathered enough facts to substantiate and define the exact problem, the appropriate action is initiated.

Ambient Air Monitoring maintains, operates, and collects data from various air monitoring stations located within the Southwest District. They are responsible for sites located in Polk, Pasco, and Manatee County. Hillsborough and Pinellas Counties also maintain and operate monitoring stations which report data to DEP and the federal Environmental Protection Agency (EPA) Region 4 office in Atlanta.

SUMMARY RESULTS

We believe that the operational goals of the SWD Air Program are generally sound. The major exception we noted was the number of unresolved enforcement cases. The SWD was responsible for 12 of 13 cases that had exceeded the 270 day limit for closure required by the U.S. Environmental Protection Agency (EPA). The other outstanding case was associated with a local program administered by Hillsborough County. The backlog of SWD Air Program enforcement cases was not comparable with other DEP District Air Programs. We believe the probable root causes for the enforcement case back log were (in descending order of importance):

- Lack of a well-defined Management Plan
- Lack of a well-defined Change Plan
- Poor communication on the part of Program management
- Too slow a pace for execution of needed Program changes

We also noted low employee satisfaction with management practices expressed by SWD staff during personnel interviews conducted in the field. We believe that the probable root causes for low employee satisfaction were (in descending order of importance):

- Management practices and style at the Program and Section level
- Pre-existing staff perceptions and issues created by prior Program management that pre-dated the assignment of the current Program Administrator

Failure to effectively manage these issues may have damaged the reputation of the Program with the local regulated community and federal regulatory agency (EPA).

The summary conclusion we have reached with respect to the current situation is that it will be difficult for SWD Air Program management to carry out their management plan; to conduct operations in an efficient and effective manner; or to increase employee satisfaction without intervention by the District Director. We also recommend mediation by an acceptable third party. The goal of such mediation should be to obtain staff "buy-in" for the operational changes needed to align SWD Air Program operations more closely with the Air Programs of other DEP Districts.¹

¹The processes of other District Air Programs place a greater emphasis on expediency; risk assessment, prioritization, and open communication with staff to achieve their mission and manage enforcement case loads.

FINDINGS AND RECOMMENDATIONS

Finding 1:

The SWD Air Program enforcement case backload as of June 15, 2010 includes 12 of 13 cases agency-wide that have exceeded the 270 day limit for closure allowed by the EPA.²

Example:

Air ID #	Entity	Days Open	Days Delinquent
0490015	Hardee Power Partners	605	385
0490340	Seminole Electric Cooperative,	1059	789
0810076	American Marine Holdings,	551	281
0810211	Yellowfin Yachts, Inc.	1093	823
1050003	Lakeland Electric	699	429
1050004	Lakeland Electric	1100	830
1050046	Mosaic Fertilizer, LLC	1912	1642
1050053	Mosaic Fertilizer, LLC	1274	1004
1050059	Mosaic Fertilizer, LLC	740	470
1050233	Tampa Electric Company	516	246
1050352	Lakeland Electric	749	479
1050432	General Engines Company	534	264

Comment:

The EPA and states share responsibility for environmental protection and work as partners to set and meet environmental goals, to track and share information on compliance rates, to give compliance assistance and to enforce the law when necessary.

According to Division of Air Resource Management (DARM) staff, the EPA has expressed concern regarding the agency's inability to resolve outstanding cases in a timely manner. Five cases have been open in excess of 1000 days.

Recommendation:

Failure to effectively manage these enforcement issues has potentially damaged the reputation of the Program with the regulated entities and the federal regulatory agency in a harmful way. SWD management should examine the methods used to categorize violations, assess the process used to determine if the violation requires enforcement, assess the efficiency of the enforcement process, and implement a solution to effectively address the enforcement case backlog. The process should place a greater emphasis on expediency; risk assessment, prioritization, and open communication with Program staff and the regulated community.

²Title 40, Code of Federal Regulations (CFR): Protection of Environment (40 CFR 262.34, Accumulation Time) - a generator who accumulates hazardous waste may be subject to the requirements cited under Title 40 CFR

Finding 2:

The SWD Air Program enforcement case backlog was disproportionately high compared with other DEP District Air Programs.

Examples:

- A June 2010 report provided by the Division of Air Resources Management included the following enforcement case load data for District Air Programs:

	NWD	NED	CD	SWD	SED	SD
Staff	15	18	16	23	11	8
Enforcement Cases	8	2	18	104	5	8
Avg. Days Open	85	94	124	616	245	102
Facilities Regulated	315	200	498	600	130	200
Title V Facilities	42	44	51	66	27	19

- SWD staff members alleged that the PA did not allow permits to be issued if the applicant had pending enforcement cases or outstanding penalties (Staff commented, “Permits were held as bargaining chips”)
- Staff alleged that they had been directed to ask clients to file for permit extensions because the enforcement case backlog had forced the district to exceed the deadline for processing the permit
- Staff asserted that the enforcement case backlog was due to the PA and a section supervisor placing undue emphasis on enforcement case issues to the detriment of the overall Program.

Comment:

The SWD Air Program is responsible for regulating more facilities, including more Title V facilities³ than any other DEP District Air Program. Notwithstanding the fact that SWD has more staff than any other District Air Program, the SWD has had difficulty keeping pace with the addition of new enforcement cases. On average, 7 enforcement cases were added each week, while approximately 3 enforcement cases were closed (according to statements made by the Enforcement Section Supervisor). This appeared to be due to a failure to prioritize and categorize violations in accordance with existing guidelines available to Air Program staffs.⁴

Recommendation:

See finding 1.

³Title V. - Title V [Title V of the 1990 Federal Clean Air Act Amendments](#) is a federal program designed to standardize air quality permits and the permitting process for major sources of emissions across the country.

⁴Guidelines for Characterizing Air Violations, Rev. June 10, 2010 (and) DEP Directive 923, July 17, 2007.

Finding 3:

We found a significant process change in progress within the SWD Air Program without the benefit of a formal Management Plan, Change Plan, or Communications Plan.

Examples:

- According to the SWD Program Administrator (PA), upon being assigned to the district, the PA determined that changes were needed in order for the Program to achieve its goals
- The PA acknowledged that the changes initiated were characterized by direct control and shifted decision-making from section supervisors to the Program Administrator
- According to a majority of staff members interviewed, questions asked by staff in attempts to understand the need for change were met with defensive behaviors on the part of the PA
- Changes that were intended to improve the efficiency and performance of Program operations have not been embraced by staff, who continue to question among themselves the appropriateness of changes that continue to take place within the Program

Comment:

A formal Management Plan, Change Plan, and Communications Plan are necessary components of effective change management. It should not be assumed that staff understands the issues, feels the need to change, or sees the new direction as clearly as management.

Recommendation:

SWD District Management should create a formal Management Plan, Change Plan, and Communications Plan with respect to all phases of the Program's intended operational changes.

The SWD Program Administrator should immediately and openly communicate appropriate information with respect to the operational changes to staff. The scope of communications should extend "from inception to completion" for the change process.⁵

Additionally, staff should be provided a forum in which to express concerns, ask questions, and make suggestions. This should be the responsibility of all supervisors and managers, with accountability for effective communication made a part of the evaluation process.

⁵Heathfield, Susan M., *Build Support for Effective Change Management*, September 2010. - Summary of best practices for effective change management.

Finding 4:

Management practices were not conducive to organizational success.

Example:

- Staff commented that the SWD Air Program had become too “bureaucratic,” emphasizing process more than protection with an undue emphasis on enforcement

Comment:

SWD Program management appeared to be inflexible in its execution of changes that were perceived to be necessary.

Any significant transformation will create “people” issues. Dealing with these issues on a reactive, case-by-case basis places efficiency, morale, and results at risk. Change management requires a disciplined approach. Change management should be fully integrated into program planning. It should be based on a realistic assessment of the organization’s history, readiness, and capacity to change – and, most important – the reasons for change must be communicated clearly, along with a clear expectation for each step of the change process.

Individuals are inherently rational and will question to what extent change is needed, whether the organization is headed in the right direction, and if they want to personally commit to making change happen. They will look to management for answers. Articulating a formal case for change and communicating a consistent vision statement with respect to the desired outcomes are critical in obtaining team alignment. Leaders must customize their message to accommodate employee diversity, describing the impending change in terms that are understandable and matter to each individual.

Recommendation:

See the recommendation for finding 3.

Finding 5:

Management was not skilled at effectively addressing race, gender, age, or discrimination issues.

Examples:

- SWD Air Program staff expressed a belief that SWD Program management had an age or gender bias that was reflected in hiring, promotion, and management style
- Male employees expressed a belief that preferential consideration was given to female candidates in hiring and promotion

- Some staff expressed a belief that several former employees were targeted for termination based upon their gender or for expressing dissatisfaction with Program management

Comment:

It is our opinion that SWD Air Program management did not adequately address the age, gender, ethnic, and professional diversity of the Program staff in planning changes instituted closely following the PA joining the Program; and placed too great an emphasis on the processes, while the human factors were neglected.

Additionally, no evidence was found that a baseline of the Program's process capability was developed prior to initiating the changes. As a result, success or failure of the changes was not monitored; nor were adjustments made to correct for accumulating case backlogs.

Recommendation:

SWD Air Program management should request consulting services support from the OIG to help develop a plan for an efficient and effective transition to the desired operational model.

Finding 6:

There was a perception by staff that section supervisors were not empowered to make decisions. This undermined the section supervisors' ability to effectively lead their staff.

Examples:

- Staff interview responses included the comment, "section supervisors are puppets" (of the Program Administrator).
- The SWD Program Administrator characterized the three section supervisors to our interviewers as "young and inexperienced," therefore requiring an exceptional degree of oversight.

Comment:

The section supervisors were apparently recruited personally by the SWD Program Administrator. Information provided to us suggests that the section supervisors were well qualified and experienced in their respective areas. For the Program Administrator to characterize them as "young and inexperienced" appears disingenuous and not supported by factual evidence.

Recommendation:

It is our opinion that in order for the SWD Air Program to successfully achieve its operational goals section supervisors must be empowered to directly manage the issues for which their Section is responsible.

Additionally, the section supervisors must give evidence to Program staff members that they are enabled, and capable of making appropriate operational decisions. Training opportunities should be provided in order to address any actual weaknesses on the part of the section supervisors.

Finding 7:

SWD Air Program staff characterized the PA as “controlling,” and “micromanaging.” This management style made employees feel they were not “trusted” to make even minor decisions or to carry out tasks they were empowered by previous managers to carry out. This led to a perception by staff that Program management did not believe their section supervisors were capable of taking independent action.

Examples:

- Staff commented that it felt like “they were treated like children” rather than as “professionals”
- Several staff expressed the belief that supervisors lacked the knowledge required to address employee’s technical questions related to Program operations
- There was a general perception among staff that even the most trivial matters were micromanaged by the Program Administrator
- There was a general perception that Section supervisors and individual staff were not allowed to make decisions without the involvement of the PA
- Multiple staff asserted that micromanagement on the part of the Program Administrator had adversely affected productivity, caused unnecessary work delays, contributed to case backlogs, and caused resentment among staff

Comment:

Changes instituted by the SWD Air Program Administrator were inherently unsettling for staff, and when change was imminent staff members turned to their immediate supervisors for leadership, support, and direction. The section supervisors needed to embrace the changes first to challenge and motivate the rest of the staff, speaking with one voice and “walking the talk” to model desired behavior. At the same time, individual supervisors were experiencing their own

personal changes and needed to be supported by the Program Administrator. When the section supervisors were perceived by staff as ineffective, the staff turned to its most senior members for guidance and leadership, further undermining the effectiveness of the section supervisors.

Recommendation:

We found Program staff to be experienced, well-trained professionals. The diversity, longevity, and professional experience of the SWD Air Program staff should be considered an asset. It is our opinion that staff must be empowered to make individual decisions with guidance from their Section supervisors.

In addition, the Program Administrator should observe the “chain of command” and avoid publicly countermanding decisions of the section supervisors, or interacting directly with staff beyond interpersonal communications and socializing.

Finding 8:

The interpersonal relationship between staff and section supervisors was described as positive.

Examples:

None

Comment:

Although the interpersonal relationships between staff and their supervisors were described as positive, two of the twenty-one employees interviewed stated that there was very little interaction with their supervisor. They also stated they were unable to approach their supervisor with issues because the supervisor lacked the technical expertise to answer their questions. When the Section supervisors were questioned with respect to the comments, the responses supported our finding that the section supervisors are constrained in their ability to answer technical questions or to make decisions by the limitations placed on them by the Program Administrator.

Recommendation:

The Section supervisors must communicate their readiness to deal directly with technical questions and issues presented by SWD staff. The SWD Program Administrator should rely on section supervisors to raise issues to the next level at their discretion.

Finding 9:

Employees believe they are treated with dignity and respect by their immediate supervisor.

Examples:

None

Comment:

We found no indication that the interpersonal relationships between workers and supervision had contributed to low employee satisfaction or to reduced operational efficiency and effectiveness within the SWD Air Program.

Some SWD Air Program staff expressed general dissatisfaction with respect to many of the actions taken by Program management; which contrasted with a general sentiment that the PA and Section supervisors were well thought of as individuals. This may indicate that many of the issues existing in the SWD are related to decisions and actions taken by management, rather than personality conflicts.

Recommendation:

None

Finding 10:

Employees believe that they are able to discuss their concerns with their immediate supervisor; however, one third of the SWD Air Program staff members believe that if they have a conflict with their immediate supervisor they cannot take it to the next level without fear of reprisal.

Examples:

- All staff members expressed the belief that they were able to discuss their concerns with their immediate supervisor; although several staff commented that they could only express their concerns up to a point; because any statement made in confidence to the supervisor would be communicated to the PA
- Employees expressed a belief that there would be immediate or long-term reprisals as a result of any criticism of Program management
- Employees stated that staff has been reprimanded by the Program Administrator for expressing comments that were perceived as negative and were instructed not to place negative comments in emails

- Employees stated that they believed staff had been terminated, forced to resign or chose to resign for expressing concerns that were perceived to be negative by Program management
- Employees stated that they believed their section supervisor listened to their concerns but was powerless to address the issues due to the defensive reaction of the PA to criticism

Comment:

Employees appeared to be comfortable discussing concerns with their immediate supervisor, but were not comfortable discussing their concerns with management beyond their immediate supervisor. Staff stated that the source of their concern was with the potential reaction of the Program Administrator.

Recommendation:

The assertion described in finding 10 is not consistent with DEP values and warrants the attention of the District Director.

Finding 11:

SWD Air Program Staff consistently expressed a reluctance to freely say what they think in open meetings or during individual exchanges with the Air Program Administrator. Among the reasons provided was a habitual defensive response by the PA when presented with questions related to management practices, and fear of reprisal for being “negative” (employees stated that they had been reprimanded for expressing negative sentiments verbally and in emails).

Example:

- During a general meeting of SWD Air Program staff, several employees expressed concern with respect to a reorganization and reprioritization of tasks introduced by the Program Administrator. In response to questions by the senior staff, the Administrator became defensive and visibly angry. As a result staff declined to ask further questions or volunteer any comments related to Program administration.

Comment:

The episode given as an example had a chilling effect on the willingness of Program staff to freely say what they think due to fear of reprisals.

Recommendation:

The assertion described in finding 11 is also not consistent with DEP values and warrants the attention of the District Director.

Finding 12:

Management failed to communicate effectively with staff.

Examples:

- A retreat was conducted for District management. Management did not communicate the purpose of the retreat with employees, the topics discussed, or improvement actions planned as a result of the retreat.
- SWD Air Program management did not communicate the reasons for decisions or procedural changes
- SWD Air Program staff were not included in the planning process
- SWD Air Program staff were concerned that the District Director did not know what was occurring in the Air Program because there was not a forum for them to express their concerns
- Issues identified in prior Employee Climate Surveys have not been addressed by SWD management even though the results indicated low satisfaction

Comment:

A Communication Plan is a necessary part of good management practice. It should not be assumed that staff understands the issues, feels the need to change, and sees the new direction as clearly as management. The messages of management must be reinforced through regular, timely communication that is both inspirational and actionable. In particular, change requires over-communication through multiple, redundant channels. In the absence of communication staff is left to make assumptions and come to conclusions based on limited information or misinformation.

Recommendation:

SWD management should communicate appropriate information to staffs at all levels. Staff should be provided a forum to express concerns, ask questions, and make suggestions. This should be the responsibility of all supervisors and managers, with accountability for effective communication made a part of the evaluation process.

DIVISION AND PROGRAM RESPONSE

The Division and Program Response is Program management's statement of how report findings will be resolved.

The Southwest District management team has generally agreed with the findings and recommendations of the OIG Final Report, and has made substantial progress as of the date of this report to address the issues cited herein.

SUBSTANTIALLY AFFECTED PARTY RESPONSE

A substantially affected party response was not required for this management review.

AUTHORITY

This management review was conducted under the authority of the Inspector General Act of 1994 (Section 20.055, Florida Statutes) which established duties, responsibilities, and authority of an Inspector General in the State of Florida. In addition, this review was performed in accordance with the International Professional Practices Framework published by the Institute of Internal Auditors, and the Principles and Standards for Offices of Inspectors General published by the Association of Inspectors General.

The Final Report was prepared by Court F. Lilly, Director of Program Review and Improvement; and Don Hurst, Auditor in Charge. Please address inquiries regarding this report to the OIG by telephone at (850) 245-3151. Copies of final reports may be viewed and downloaded via the internet at <http://www.dep.state.fl.us/ig/reports/default.htm>. Copies may also be obtained by telephone (850) 245-3151, by fax (850) 245-2970, in person or by mail to the Department of Environmental Protection, Office of Inspector General, at 3900 Commonwealth Boulevard, Tallahassee, FL 32399.

**Court F. Lilly, Director
Program Review and Improvement**

Roy C. Dickey, Interim Inspector General

ATTACHMENT 1: BUILDING SUPPORT FOR EFFECTIVE CHANGE MANAGEMENT

Adapted from an article by Susan M. Heathfield

Susan Heathfield is a management and organization development consultant who specializes in human resources issues in workplaces. She is a member of the Society for Human Resource Management (SHRM) and the American Society for Training and Development (ASTD). Ms Heathfield contributes regularly to professional publications including a book chapter for *ASTD* and a recent article in the *American Society for Quality's Journal for Quality and Participation*.

An organization adapts to change most successfully when:

- The staff is well prepared and knows what to expect in advance
- Management creates a trusting and trustworthy environment in advance of the change
- The organization values each employee and respects their potential contribution before, during, and after the change process
- The organization has a norm of frequent, honest communication.
- There is widespread agreement, in the organization, about the need to change

To build agreement about change and institute effective change management, do the following:

- Provide as much information as possible, to as many employees as possible, about the desired business or operational model
- Share financial information, customer feedback, employee satisfaction survey results, management projections and challenges, and data from processes you measure
- Assuming decisions about needed change are made based on relevant data, an informed workforce will understand and agree with the need for change (They may not agree on the how and/or what, but you are miles ahead if you have agreement on the why and the fact that the change IS going to happen)
- Create urgency around the need to change by forecasting for your workforce what will happen if you don't make the needed changes
- Communicate information honestly and use data whenever it is available
- Ensure that you actually do have compelling reasons for making the changes
- Spend extra time and energy working with your front line supervisory staff to ensure that they understand, can communicate about, and support the changes

Help employees feel that they are involved in a change management process that is larger than themselves.