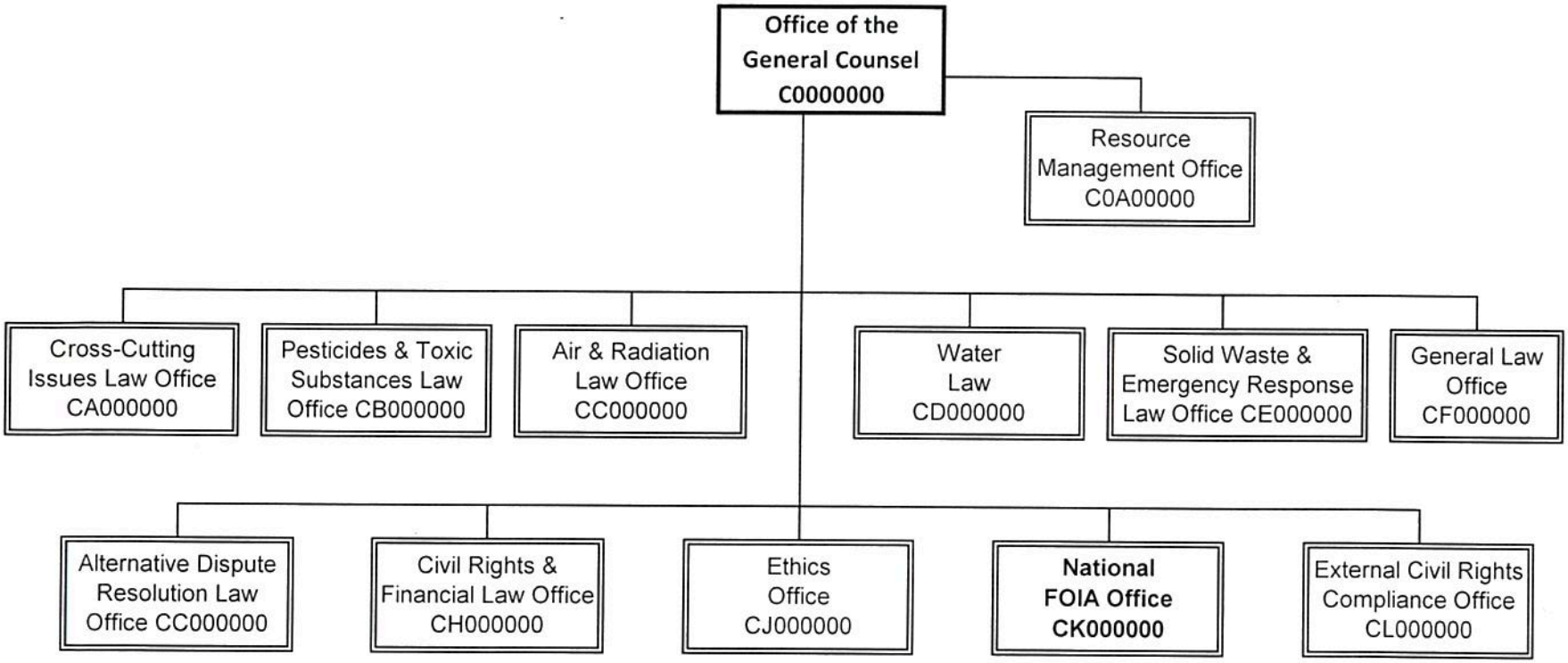
NATIONAL FOIA OFFICE CK000000 (Change in Org Title)

(A) Current Org Code	(B) Current Acronym	(C) Employee Name	(D) Current Position Title	(E) Position Series/Grade			(F) Empl ID	(G) Realign (L) Reassign (R) No Change (NC)	(H) Notes
		Vacant Position	Associate General Counsel/FOIA	ES	0905	00			Recruit Action
CK000000	FEAT	DOLPH, BECKY I	Senior Counsel (FEAT)	SL	0905	00	15798	NC	
CK000000	FEAT	WALKER, DENISE A.	Attorney-Adviser	GS	0905	15	2332312	NC	
GAE00000	FLAD	GOTTESMAN, LARRY F.	Gov Info Spec	GS	0306	15	24474	L	
CK000000	FEAT	MOUMBLEAUX, JOAN C.	Gov Info Spec	GS	0306	14	2333711	NC	
GAE00000	FLAD	LEWIS, MONICA L.	Gov Info Spec	GS	0306	13	19088	L	
GAE00000	FLAD	PERSON, LINDA F.	Gov Info Spec	GS	0306	13	8527	L	
GAE00000	FLAD	SCHUMACHER, WENDY	Gov Info Spec	GS	0306	13	12995	L	
CK000000	FEAT	BERMES, PETER E.	Attorney-Adviser	GS	0905	12	2333304	NC	
CK000000	FEAT	CLARKE, VICTORIA K.	Attorney-Adviser	GS	0905	12	2334665	NC	
CK000000	FEAT	REMENTER, NICOLE M.	Attorney-Adviser	GS	0905	12	2334540	NC	
CK000000	OGC	CREECH, CHRISTOPHER	Law Clerk	GS	0904	11	2334964	L	
		Vacant Position	Attorney-Adviser	GS	0905	11			Recruit Action
		Vacant Position	Attorney-Adviser	GS	0905	11			Recruit Action
		Vacant Position	Attorney-Adviser	GS	0905	13			Recruit Action
		Vacant Position	Gov Info Spec	GS	0306	13			Recruit Action
		Vacant Position	Gov Info Spec	GS	0306	13			Recruit Action
		Vacant Position	Gov Info Spec	GS	0306	12			Recruit Action
		Vacant Position	Gov Info Spec	GS	0306	11			Recruit Action
		Vacant Position	Law Clerk	GS	0904	11			Recruit Action

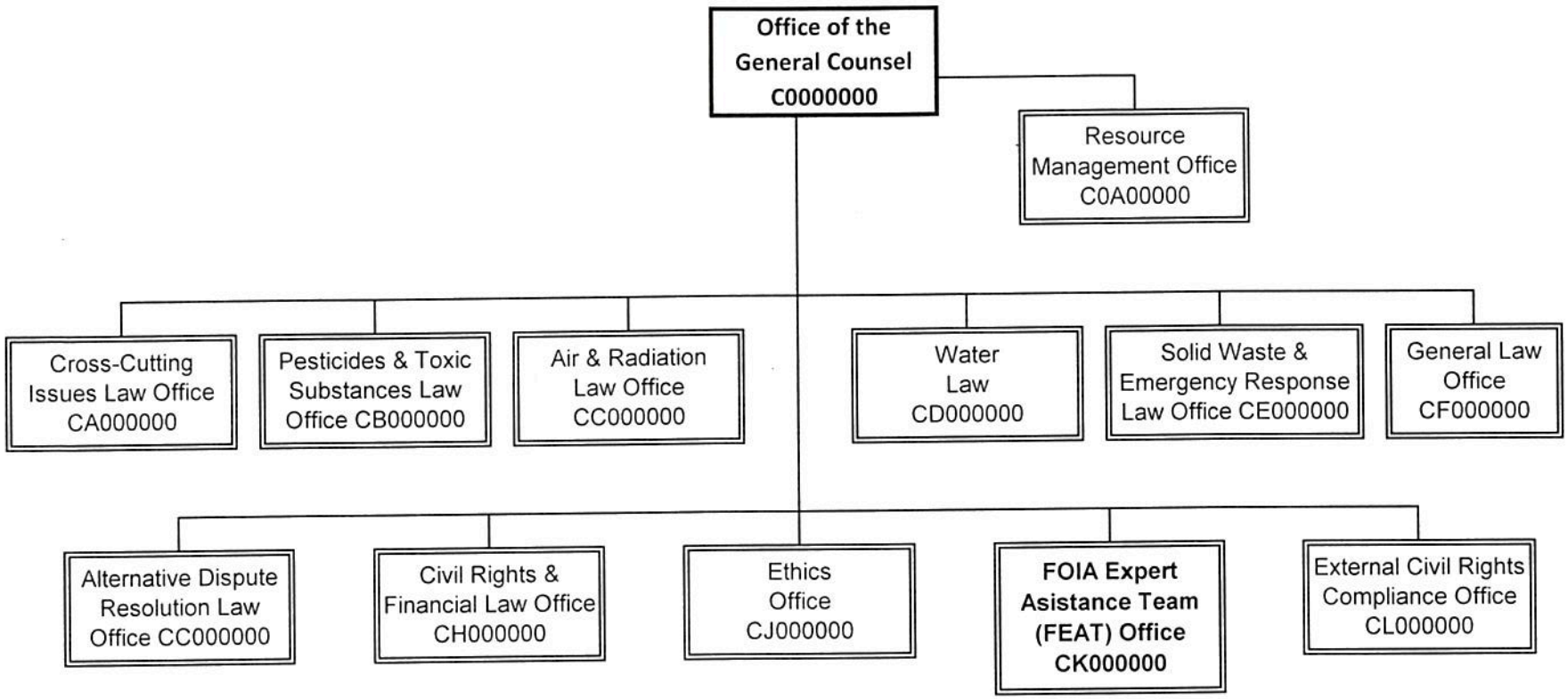
Proposed Organizational Structure

Office of the General Counsel Management



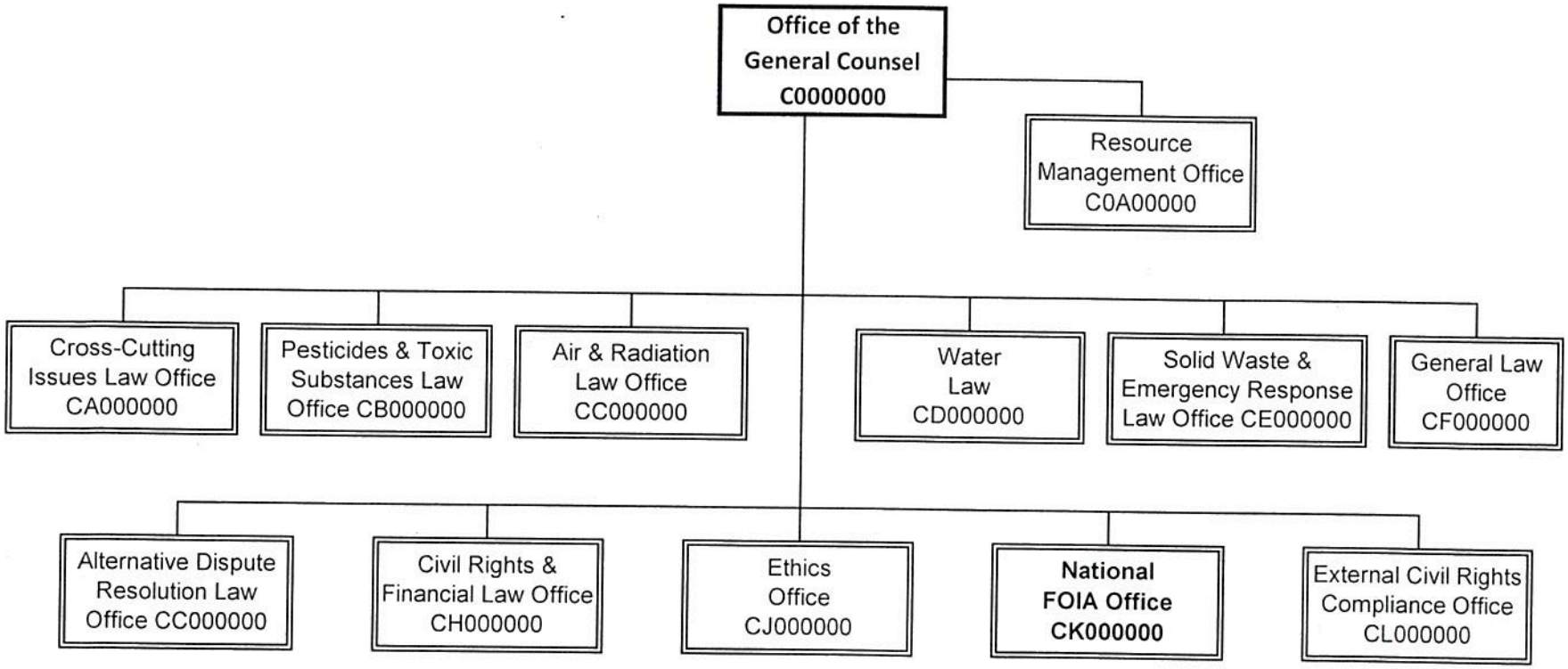
Current Organizational Structure

Office of the General Counsel Management



Proposed Organizational Structure

Office of the General Counsel Management



EPA REORGANIZATION PROPOSAL

The Reorganization Proposal form must be completed, ***signed by your Assistant Administrator/Regional Administrator,*** *and submitted to Troy Boxton, OARM, Office of Human Resources, Policy, Planning and Training Division and to your designated HR Shared Service Center Representative via* ***email and hardcopy*** *for review. Please complete this form in its entirety and submit with all required documents and approvals; forms are available at http://intranet.epa.gov/ohr/programs/reorg/start.htm.* ***If you have any questions regarding completion of this form, please see page 2 for Troy's contact information.***

A. CONCISE STATEMENT OF CHANGE

1. Provide an executive summary that succinctly explains the proposed change(s) (one paragraph or less).

This reorganization relocates the FOIA staff from the FOIA, Libraries & Accessibility Division of the Office of Enterprise Information Programs within the Office of Environmental Information to the Office of General Counsel. Within OGC, these staff will be part of the FOIA Operations and Implementation Team and will join with the FOIA Expert Assistance Team (FEAT) Office to create a new National FOIA Office.

2. Describe the title(s) of the unit(s) affected.

FOIA, Libraries & Accessibility Division
FOIA Expert Assistance Team (FEAT) Office

3. Explain the change purpose (e.g., whether the change is due to a new legislative authority, new program authority or shifts in program emphasis).

The purpose of this change is to co-locate the FOIA program staff and the FOIA Expert Assistance Team staff under a single office. This is expected to create efficiencies and improve the effectiveness of the agency's FOIA Program.

4. Discuss the progress to date based on communications with level approvers and discussions with stakeholders, unions, SSCs, etc.

EPA's Chief of Staff has discussed this proposal with the Acting Deputy Administrator, the Acting Assistant Administrator for OEI, the Acting General Counsel, and the Acting Assistant Administrator for OARM. In addition, the Chief of Staff and Acting Assistant Administrator for OARM have consulted with OCFO and OCIR regarding potential Congressional interest and responsibilities, and held an informal discussion with key Congressional staff on September 29, 2017. The Acting General Counsel had consulted with the Director of the FEAT. A briefing for the relevant unions and outreach to impacted staff will be done at the earliest possible time.

5. Describe the benefits of this change(s) to the agency (e.g., increased accountability, enhanced communication and coordination, improved efficiency).

This reorganization will significantly increase the effectiveness and visibility of the National FOIA Program, by bringing together the team setting FOIA policies and procedures for the agency with the legal experts in FOIA processing at EPA. The reorganization will also increase accountability by placing all FOIA-related program and legal responsibilities under the Office of General

Counsel. Finally, the reorganization will increase collaboration, improve the efficiency of EPA's programmatic FOIA work and delivery of critical legal advice, and provide agency stakeholders with a clear understanding of which office to turn to when they need FOIA-related assistance.

6. Is there an impact between AA/RA offices, between offices within an AA office or between Regional divisions?

Yes. Five FTE (four of which are currently encumbered) will be move from OEI to OGC. Two grantees working under the Senior Environmental Employees program will also move from OEI to OGC. In addition, the Chief of Staff has authorized the re-distribution of five FTE from outside of OGC to the new office once the reorganization has occurred.

B. ANALYSIS OF IMPACT ON PERSONNEL

1. Will there be an impact on the supervisor-to-staff ratio at the AAship/RAship level? (Contact your HRO/PMO for the current ratio). ☐ No X Yes

If yes, please explain and include your present AAship/RAship supervisor-to-staff ratio _____ and the proposed AAship/RAship supervisor-to-staff ratio _____.

This reorganization will have only minor impacts on supervisor-to-staff ratios. Within OEI the supervisor-to-staff ratio will change from 1:6.8 to 1:6.9. Similarly, within OGC the supervisor-to-staff ratio will change from 1:9.4 to 1:9.3

2. Will this proposed reorganization: (a) Eliminate positions; (b) Cause a reduction in force; (c) Change how positions are graded; (d) Add new functional units; or (e) Support a VERA/VSIP?
X No ☐ Yes
If yes, please explain.

3. Will there be an impact on the diversity of the organization? X No ☐ Yes
If yes, please explain.

C. ADMINISTRATIVE ISSUES *(Failure to address all administrative issues may result in a delay in the implementation of the reorganization.)*

1. Will there be any physical moves of staff? ☐ No X Yes

Ideally, yes. OGC would like to move the incoming OEI staff to space near the existing OGC space. Any physical movement of employees will occur in accordance with the generic move agreement made with our union partners.

2. Will new space be required? ☐ No X Yes

OGC will work with staff in the Facilities Management & Services Division to explore the availability of new space for the incoming staff.

3. Will the reorganization require new information systems/technologies, or significant changes to existing ones, and (if so) has it been acquired? X No ☐ Yes
If so, have all technical (computer, telecommunications, etc.) needs been assessed?

4. Will there be any budgetary impacts? **If yes, please explain in detail.** ☐ No X Yes

The resources associated with this function (both FTE and financial) will move from OEI to OGC.

D. **EPA DIRECTIVES**

1. Will any Delegations of Authority, Orders or Manuals be affected? X No X☐ Yes

Delegation 1-19, Directives, will be updated to authorize the General Counsel to issue agency directives related to the agency's FOIA obligations and remove such authority from the Chief Information Officer.
Delegation 1-30, Freedom of Information, will be updated to reflect the new National FOIA Office.
Delegation 1-84, Information Resources Management, will be updated to reflect the new National FOIA Office.

E. **ATTACHMENTS** *(Use the forms provided)*

1. Staffing Plan Crosswalk (*Use Staffing Plan Template*). Contact your servicing HR SSC for information *(Do not include social security numbers)*.

Please see attached document

2. Current Organizational Chart.

Please see attached document

3. Proposed Organizational Chart (*Must include all organization levels*).

Please see attached document

4. Current Functional Statement.

Please see attached document

5. Proposed Functional Statement (*Must include all reporting levels*).

Please see attached document

Assistant Administrator/Regional Administrator Approval

EPA	REORGANIZATION PROPOSAL
Name: Kevin S. Minoli	**Title:** Acting GC
Signature:	**Date:** 12/7/17
Human Resources Office/Program Management Office Reviewed (OGC)	
Name: KRAIG E. Lattimore	**Title:** Director, Resource Mgmt Office
Signature: Kraig E. Lattimore	**Date:** 12-12-17
RTP Human Resources Shared Service Center Approval (Certifies Receipt of this Package)	
Name:	**Title:**
Signature:	**Date:**

EPA	REORGANIZATION PROPOSAL
Name: Kevin S Minoli	Title: Acting GC
Signature: KSM	Date: 12/7/17
Human Resources Office/Program Management Office Reviewed (OGC)	
Name: KRAIG E. LaHimore	Title: Director, Resource Mgmt Office
Signature: Kraig E LaHimore	Date: 12-12-17
RTP Human Resources Shared Service Center Approval (Certifies Receipt of this Package)	
Name: Jeremy Taylor	Title: Director RTP-SSC
Signature:	Date: 12/12/17

EPA

REORGANIZATION DECISION MEMORANDUM

The decision memorandum must be completed, ***signed by the Assistant Administrator/ Regional Administrator,*** *submitted to Troy Boxton, Office of Human Resources, Policy, Planning and Training Division and the designated HR Shared Service Center Representative via* ***email and hardcopy*** *for review. If there are questions regarding this form, please refer to the agency's reorganization website for additional information at: http://intranet.epa.gov/ohr/programs/reorg/steps.htm*

NOTE: Signing of this memorandum prior to stakeholder reviews does not confirm that the AA/RA agrees to any comments received pending final stakeholder comments.

MEMORANDUM

DATE: **12/7/2017**

SUBJECT: National FOIA Office Reorganization Proposal — **REORGANIZATION DECISION MEMORANDUM**

FROM: Becky Dolph, Director
FOIA Expert Assistance Team Office

TO: Kevin Minoli
Acting General Counsel

NEED

The purpose of this change is to co-locate the FOIA program staff and the FOIA Expert Assistance Team staff under a single office. This is expected to create efficiencies and improve the effectiveness of the agency's FOIA Program.

PROPOSAL

Significant Changes: This reorganization relocates the FOIA staff from the FOIA, Libraries & Accessibility Division of the Office of Enterprise Information Programs within the Office of Environmental Information to the Office of General Counsel. Within OGC, these staff will be part of the FOIA Operations and Implementation Team and will join with the FOIA Expert Assistance Team (FEAT) Office to create a new National FOIA Office.

Key Discussions To Date: EPA's Chief of Staff has discussed this proposal with the Acting Deputy Administrator, the Acting Assistant Administrator for OEI, the Acting General

Counsel, and the Acting Assistant Administrator for OARM. In addition, the Chief of Staff and Acting Assistant Administrator for OARM have consulted with OCFO and OCIR regarding potential Congressional interest and responsibilities, and held an informal discussion with key Congressional staff on September 29, 2017. The Acting General Counsel had consulted with the Principal Deputy General Counsel, the Director of the FEAT, and the Associate General Counsel for the General Law Office. A briefing for the relevant unions and outreach to impacted staff will be done at the earliest possible time.

REVIEW AND ANALYSIS

Reviews and Comments Resolution: [*(1) reviews the proposal has undergone, including OHR's vetting of the proposal with appropriate agency stakeholders (e.g., OARM, OCFO, OGC, OIG, etc.); (2) explanation of any comments received during the formal review process; and (3) describe how all of the comments were resolved.*]

RECOMMENDATION

I have received notice from the Office of Administration and Resources Management's Office of Human Resources that all comments have been satisfactorily resolved and the proposal is ready for approval.

Approved: _____
[AA or RA]

Date: 12/7/17

Attachment:

Tab A: Reorganization Proposal Form

PROPOSED FUNCTIONAL STATEMENT

OFFICE: National FOIA Office

HEADQUARTERS OR REGIONAL OFFICE: Office of General Counsel

REPORTS TO: Principal Deputy General Counsel

FUNCTIONS: Under the supervision of the Associate General Counsel, this unit serves as the National Program Manager for FOIA and provides legal counsel and programmatic direction on issues pertaining to FOIA requests received across the Agency. The unit is broken into two teams: the FOIA Operations and Implementation Team and the FOIA Expert Assistance Team. Utilizing an extraordinary breadth of FOIA knowledge and experience, together with in-depth organizational and external awareness, the teams provide advice and guidance to the highest echelons of management within the Agency

The FOIA Operations and Implementation Team leads the Agency's FOIA program by:

- Developing and overseeing the implementation of Agency policies, procedures and guidance to ensure the timely and appropriate release of information under FOIA; and by
- Serving as the Agency FOIA Officer and working closely with all EPA offices to implement FOIA responsibilities Agency-wide.

The FOIA Expect Assistance Team supports the Agency's FOIA program by:

- Providing legal and strategic support to the FOIA Operations and Implementation Team;
- Providing legal and project management support to offices across the agency on the most complex and challenging FOIA requests; and by
- Providing legal advice on FOIA requests received by the Agency.

PROPOSED FUNCTIONAL STATEMENT

DIVISION: Libraries & Accessibility Division

HEADQUARTERS OR REGIONAL OFFICE: Office of Environmental Information

REPORTS TO: Office Director, Environmental Information Programs

FUNCTIONS: This Division supports the Agency's FOIA Program, Section 508 Program and EPA's National Library Network. The Division is responsible for the following functions:

- Manages EPA's National Library Network, including establishing central library policy, procedures and guidance.

- Manages the EPA Headquarters Library and assists with management of the EPA Chemical Library.

- Leads and coordinates efforts to make EPA's data and information accessible to individuals with disabilities and ensures compliance with Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended by the Workforce Investment Act of 1998 (P.L. 105-220, August 7, 1998).

CURRENT FUNCTIONAL STATEMENT

DIVISION: FOIA, Libraries & Accessibility Division

HEADQUARTERS OR REGIONAL OFFICE: Office of Environmental Information

REPORTS TO: Office Director, Environmental Information Programs

FUNCTIONS: This Division supports the Agency's FOIA Program, Section 508 Program and EPA's National Library Network. The Division is responsible for the following functions:

- Develops and oversees the implementation of Agency policies, procedures and guidance to ensure the timely and appropriate release of information under FOIA.
- Serves as the Agency FOIA Officer and works closely with all EPA offices to implement Agency-wide FOIA responsibilities.
- Manages EPA's National Library Network, including establishing central library policy, procedures and guidance.
- Manages the EPA Headquarters Library and assists with management of the EPA Chemical Library.
- Leads and coordinates efforts to make EPA's data and information accessible to individuals with disabilities and ensures compliance with Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended by the Workforce Investment Act of 1998 (P.L. 105-220, August 7, 1998).

CURRENT FUNCTIONAL STATEMENT

OFFICE: FOIA Expert Assistance Team Office

HEADQUARTERS OR REGIONAL OFFICE: Office of General Counsel

REPORTS TO: Principal Deputy General Counsel

FUNCTIONS: Under the supervision of the Senior Counsel, this unit provides legal counsel on all issues pertaining to selected FOIA requests that have been determined to be most complex and/or potentially sensitive requests received across the Agency. Utilizing an extraordinary breadth of FOIA knowledge and experience, together with in-depth organizational and external awareness, the team provides advice and guidance to the highest echelons of management within the Agency.