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Description of document: Department of Energy (DOE) Organizational Culture Assessment - DOE Environment Consolidated Business Center 2014

Requested date: 18-July-2021

Release date: 02-August-2021

Posted date: 10-October-2022

Source of document: FOIA Request
FOIA Request Service Center
1000 Independence Avenue, SW
Mail Stop MA-46
Washington, DC 20585
Fax: (202) 586-0575
Email: FOIA-Central@hq.doe.gov
[DOE Headquarters FOIA Request Form](#)

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From: Bedinghaus, Michele <michele.bedinghaus@emcbc.doe.gov>
Sent: Mon, Aug 2, 2021 9:37 am

Per our conversation, I have attached the newly revised redacted copy of the document that you have requested along with the new final response letter and the original final response letter.

Best Regards,
Michele Bedinghaus
Contractor FOIA/Privacy Act Specialist
TekProSupport Services, LLC
550 Main St. Room 7-010
Cincinnati, OH 45202
michele.bedinghaus@emcbc.doe.gov



Department of Energy

**Environmental Management
Consolidated Business Center
550 Main Street, Room 7-010
Cincinnati, Ohio 45202
(513) 246-0500**

August 2, 2021

EMCBC-OCC-0022-21

FREEDOM OF INFORMATION ACT REQUEST – EMCBC-2019-00463-F

This letter and the enclosed records are in response to your email of July 18, 2021, requesting the same records for which you were provided a response to on September 9, 2020 for Freedom of Information Act (FOIA) request EMCBC-2019-00463-F submitted on February 9, 2019.

On July 19, 2021, a member of our staff contacted you to inquire as to why you were requesting the same records that were already provided to you in response to FOIA request EMCBC-2019-00463-F. You informed the staff member that you were not satisfied that all the exemptions applied to the responsive records were valid and that you missed the window to file an appeal. You stated that you sent the request dated July 18, 2021 in order to get a new response for which you might then be able to file an appeal.

The record you requested on February 9, 2019 and again on July 18, 2021 was described as follows: "A copy of the Organizational Assessment conducted by J G Management Systems, Inc. for DOE in 2014 under contract DEDT0007122, associated with parent award DEEM0002037. Specifically, it was an Organization Culture Assessment of the Environmental Management Consolidated Business Center."

On occasion, requesters and agency representatives continue to discuss information that was provided in order to bring resolution to a requester's concerns. In your case, we reexamined the records in question to ensure that the exemption applied at the time of our original response were applied correctly and to determine whether the exemption applied is still relevant today given that the impact of case law can change the application of FOIA as well as the change of various sensitivities with certain records over time.

After careful review and consideration of the information contained in the responsive records, we have determined that the exemption previously applied was correctly applied. However, we then looked to see if a discretionary disclosure could now be made due to the passage of time and a decrease in the sensitivity in portions of the record. We have determined that we can make a discretionary disclosure of portions of the record that were previously withheld

under Exemption 5. Portions of the record previously withheld, are now being released as a discretionary disclosure. The remaining applications of Exemption 5 are still valid, and those redactions remain in place. The reason for those redactions were listed under the heading of FOIA Exemption 5 in the enclosed prior response letter. Please refer to that letter to review an explanation of how Exemption 5 was applied.

The above-referenced number remains the assigned number to the request, and you should refer to it in correspondence with this office about this matter.

Please contact me at 513-256-4544 if further information is needed regarding this matter.

Sincerely,

SCOTT
LUCARELLI

Digitally signed by SCOTT
LUCARELLI
Date: 2021.08.02 06:57:33
-04'00'

Scott D. Lucarelli
FOIA Officer

Enclosures: As Stated



Department of Energy

**Environmental Management
Consolidated Business Center
550 Main Street, Room 7-010
Cincinnati, Ohio 45202
(513) 246-0500**

EMCBC-00628-20

FREEDOM OF INFORMATION ACT REQUEST – EMCBC-2019-00463-F

This letter and the enclosed documents are in final response to the request for information that you submitted to the Department of Energy (DOE) pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552.

You requested the following records: "A copy of the Organizational Assessment conducted by J G Management Systems, Inc. for DOE in 2014 under contract DEDT0007122, associated with parent award DEEM0002037. Specifically, it was an Organization Culture Assessment of the Environmental Management Consolidated Business Center."

A thorough search for records responsive to your request was conducted by the Environmental Management Consolidated Business Center (EMCBC) in Cincinnati, OH. The search located 11 pages of records responsive to your request.

After careful review and consideration of the information contained in the responsive records, we have determined, that some information is exempt under Exemptions 5 of the FOIA. Please see below for additional information concerning the exemption being applied to the request.

FOIA Exemption 5

5 U.S.C. § 552(b)(5) or Exemption 5 of FOIA protects "inter-agency or intra-agency memorandums or letters that would not be available by law to a party other than an agency in litigation with the agency, provided that the deliberative process privilege shall not apply to records created 25 years or more before the date on which the records were requested," from disclosure. Exemption 5 incorporates the deliberative process privilege, which protects recommendations, advice, and opinions that are part of the process by which agency decisions and policies are formulated. The information withheld under Exemption 5 consists of inter-agency pre-decisional information.

As stated directly on page two of the document itself (which is marked as "Executive Privilege" and exempt from release under the FOIA), the record is to be considered as deliberative process information not subject to release under the FOIA. The reasons therein

are listed directly on the document itself under the heading “Exemption 5, Privileged Information. The information withheld under Exemption 5 includes a frank assessment of the EMCBC organizational work culture, the assessor’s findings, suggestions for improvement, and recommendations. The withheld portions of the documents are pre-decisional and deliberative. The information is both pre-decisional, because it was developed before the agency adopted a final policy, and deliberative, in that it reflects the opinions of individuals who were consulted as part of the decision-making process. DOE may consider these preliminary views as part of the process that will lead to the agency’s final policy decision about these matters. The documents and discussions do not represent a final agency position, and their release would compromise the deliberative process by which the government makes its decisions. Thus, portions of the documents are being withheld under Exemption 5 of the FOIA as pre-decisional material that is part of the agency’s deliberative process privilege contained within Exemption 5.

In conducting the organizational assessment, numerous employees and leadership personnel were interviewed. If it were known that their comments and contributions to the assessment were to be released to the public at large, it would have a “chilling effect” on the willingness of Agency staff to provide their best input, hurting the quality of Agency policies and decision making and impacting the effectiveness of the assessment. Because of this, their contributions must be exempted from release under the deliberative process privilege.

With respect to the discretionary disclosure of deliberative information, as stated in the preceding paragraphs, the quality of agency decisions would be adversely affected if frank, written discussion of policy matters were inhibited by the knowledge that the content of such discussion might be made public. For this reason, DOE has determined that discretionary disclosure of the deliberative material is not in the public interest because foreseeable harm could result from such disclosure.

This satisfies the standard set forth at 5 U.S.C. § 552(a)(8)(A) that agencies shall withhold information under FOIA “only if (I) the agency reasonably foresees that disclosure would harm an interest protected by an exemption...; or (II) disclosure is prohibited by law...” 5 U.S.C. § 552(a)(8)(A) also provides that whenever full disclosure of a record is not possible, agencies shall “consider whether partial disclosure of information is possible...and (II) take reasonable steps necessary to segregate and release nonexempt information.” Therefore, we have determined that, in certain instances, a partial disclosure is proper.

As the Designated Denying Official, I am responsible for the determination to withhold the information pursuant to the aforementioned FOIA exemption. This decision, as well as the adequacy of the search, may be appealed within 90 calendar days from your receipt of this letter pursuant to 10 C.F.R. § 1004.8. Appeals should be addressed to the Director, Office of Hearings and Appeals, U.S. Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585-1615. The written appeal, including the envelope, must clearly indicate that a FOIA appeal is being made. You may also submit your appeal to OHA.filings@hq.doe.gov, including the phrase “Freedom of Information Act Appeal” in the subject line. This is the method preferred by the Office of Hearings and Appeals. The appeal must contain all of the elements required by 10 C.F.R. § 1004.8, including a copy of the determination letter. Thereafter, judicial review will be available to you in the Federal District Court in the district: 1) where you reside; 2) where you have your principal place of business; 3) where DOE’s records are situated; or 4) in the District of Columbia.

If you would like to discuss our response before filing an appeal to attempt to resolve your dispute without going through the appeals process, you may contact our FOIA Public Liaison. A FOIA Public Liaison is a supervisory official to whom requesters can raise questions or concerns about the agency's FOIA/PA process. FOIA Public Liaisons can explain agency records, suggest agency offices that may have responsive records, provide an estimated date of completion, and discuss how to reformulate and/or reduce the scope of requests in order to minimize fees and expedite processing time. Mr. David Ford is the EMCBC FOIA Liaison, and you are welcome to contact him for assistance at:

U.S. Department of Energy
Environmental Management
Consolidated Business Center
Office of the Director
550 Main Street, Room 7-010
Cincinnati, OH 45202
513-246-0461
david.ford@emcbc.doe.gov

If you are unable to resolve your dispute through our FOIA Public Liaison, the Office of Government Information Services (OGIS), the Federal FOIA Ombudsman's office, offers mediation services to help resolve disputes between requesters and Federal agencies. The contact information for OGIS is:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road--OGIS
College Park, MD 20740-6001
202-741-5770
877-684-6448
ogis@nara.gov
ogis.archives.gov

Important: Please note that contacting any agency official (including the FOIA analyst, FOIA Requester Service Center, or FOIA Public Liaison) and/or OGIS **is not** an alternative to filing an administrative appeal and **does not** stop the 90-day appeal clock.

The above-referenced number has been assigned to the request, and you should refer to it in correspondence with this office about this matter. Please contact the EMCBC FOIA Requester Service Center at 513-246-0489 if further information is needed regarding this matter.

Sincerely,

Bell,
Melody

Digitally signed
by Bell, Melody
Date: 2020.09.09
09:16:21 -04'00'

Melody C. Bell
Deputy Director

Enclosures: As Stated

DE-EM 0002037

**FINAL DELIVERABLE: FINAL REPORT FOR EM-GTN FACT FINDING
TASK ORDER 7122**

JGMS PRIME CONTRACT/ORDER # DE-EM0002037
TASK ORDER # DT-0007122

May 9, 2014

TO: Ralph Holland, DOE – EMCBC, Angela Cooney, DOE – EMCBC

FROM: J.G. Management Systems, Inc.

SUBJECT: Final Report for EMCBC Organizational Culture Assessment

In accordance with Task Order 7122, J.G. Management Systems, Inc. (JGMS) submits the final deliverable for DOE EM management to support the Organizational Culture Assessment.

6.0 *Final Report of Findings and Recommendations (Milestone 6)*

FINAL REPORT

The report has been reviewed with EMCBC Senior Management and submitted under separate cover.

Freedom of Information Act (FOIA)

Exemption 5, Privileged Information

Although there are many categories of privileged information, the privilege most likely to be used within DOE is the deliberative process privilege (also known as "executive privilege"). This privilege ensures that Agency staff is free to make candid comments in the formulation of Agency policies. If every rejected comment were required to be made public, it would have a "chilling effect" on the willingness of the Agency staff to provide their best input, hurting the quality of Agency policies. The following factors should be considered when deciding whether information can be OOU under Exemption 5:

1. The document must be for inter-agency or intra-agency communication only. This means that any document not generated for public release may be considered an inter-agency or intra-agency document.
2. Release of the document could cause harm to the process of developing Agency policy because such release could:
 - a. discourage open, frank discussions concerning draft policies;
 - b. cause premature disclosure of proposed policies before they are finally adopted; and
 - c. cause confusion in the public that could result from disclosing reasons and rationales that were not ultimately the grounds for an Agency's action.
3. A draft document should only be OOU under Exemption 5 if its release could harm the deliberative process.

Examples of Exemption 5 OOU information/documents:

- A. Draft or final documents that contain advice, opinions, or recommendations on new or revised Government decisions and policies, regardless of whether prepared by Federal employees, contractors, consultants, etc.
- B. Evaluations of contractor performance and their products and services by DOE personnel.
- C. Information of a speculative, tentative, or evaluative nature concerning proposed plans to procure, lease, or otherwise acquire and dispose of materials, real estate, facilities, or functions when such information would provide undue or unfair competitive advantage to private personal interests or would impede legitimate Government functions.

AN ASSESSMENT OF THE EMCBC WORK CULTURE

EXECUTIVE SUMMARY

In response to the annual Employee Viewpoint Surveys (EVS), the EMCBC has launched numerous employee-driven and management-driven initiatives in an effort to improve the quality of the work culture. The CBC consistently scores higher than other Federal Agencies and DOE organizations in most of the survey areas. Despite this commitment and impressive effort on the part of the whole organization, there remains a persistent cluster of employees who remain dissatisfied with the performance management system. After analyzing the results and corrective actions for the past three years at the CBC, and interviewing almost all the supervisors and staff at the CBC, we have reached the following conclusions:

- The efforts of the CBC management team to improve the work culture at the CBC have been exemplary.
- There is a hard-core minority viewpoint regarding supervisory decisions and treatment that is "baked in" based upon perceived, or real, slights – some dating back to the creation of the CBC. It is unlikely that any remedy exists to alter these viewpoints.
- The challenges of being a Federal employee over the past few years, due to constrained budgets, uncertainties of funding, and a general compression of promotions, bonuses and other tools to reward employee performance, have taken a toll across the Government, the CBC being no exception.
- Although the organizational structure at the CBC could benefit from some adjustments to better align specific elements with the core mission and functions, the structure is not the cause of disharmony at the CBC, and it does not significantly limit current performance. The organizational structure should be updated after the strategic plan is updated, and after a workforce analysis is conducted.
- The CBC needs to move on from an annual, reactive approach to the EVS to an energetic, positive approach that normalizes and standardizes the many individual initiatives already in practice. The CBC should create a new vision of what it takes to be the best place to work, not get mired by the few who think it's the worst place to work.

This last point is critical. There is weariness among many employees about those who constantly carp about the negative. Instead of devoting so much energy to those who cannot be converted, harness those who aspire for greatness, or would be receptive to it. This is not to say there aren't behaviors that need improvement; there are. But even these changes can be made part of a plan to have both the best supervisors and most content employees.

We have four recommendations that we believe will have a positive effect on the CBC:

1. **Strategic Plan** - Focus on moving forward and update the CBC Strategic Plan.
2. **Leadership** - Develop and empower the Supervisors at the CBC to improve their performance in "managing, mentoring, and developing" their employees.
3. **Human Resources** - Enhance the skills and capabilities of the HR employees to enable them to be a key component in the strategic planning initiative described in recommendation #1.
4. **Communications** - The communications activities and tools currently utilized by CBC management should be "institutionalized" in a Communications Plan.

I. BACKGROUND AND APPROACH

For years, the CBC has used the Employee Viewpoint Survey (EVS) as a tool to improve its work culture. These efforts have been ambitious and earnest. As compared to the rest of the survey pool, the CBC generally scores above the Government and DOE averages. However, in a number of areas, related to opportunity and trust, scores remain stubbornly negative. Moreover, despite heroic efforts to address employee concerns, the scores related to these areas have not significantly budged up or down. In fact, over half the employees were either neutral or negative when asked: "I believe the results of this survey will be used to make my agency a better place to work." Furthermore, a significant and persistent cluster reflected low satisfaction with the performance management system at the CBC, while expressing very high satisfaction with the Work/Life programs (management responses to working conditions). It was on these apparent conflicts and rather stubborn results (they changed very little over three years) that the Review Team focused its efforts.

The Team reviewed the past three years of EVS results, as well as corrective plans and initiatives to address employees concerns. We also interviewed each of the CBC Managers and Supervisors concerning these results. Focus Groups were organized for every organization to provide non-supervisory employees an opportunity to discuss the issues. Finally, each employee was provided contact information for the Review Team should they prefer to comment privately. The collective input provided a broad and representative snapshot of the CBC today, as it relates to its workplace culture.

II. STRUCTURE, MISSION, AND ORGANIZATION OF THE CBC

The EMCBC was established on June 7, 2004, to provide Environmental Management customers with required and improved business and technical support services. Particularly for the smaller EM sites, the utilization of the CBC eliminated the need for each EM site to staff and develop the capabilities to provide a wide range of business and support services. A "consolidated" business center enabled effective utilization of EM's limited manpower. Over time, the successes of the CBC have led to greater utilization of the CBC by more customers. For example, the CBC Legal office provides support to LM, as well as EM. The Cost Estimating team has been recognized as a Center of Excellence for all of EM. The

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Safety & Quality Division provides Safety Management and Quality Assurance capabilities and Subject Matter Experts for Accident Investigations and other critical efforts. CBC is considered a leader in QA practices and techniques. Further, the Emergency Management team provides expertise and leadership for emergencies, and in the preparation and risk minimization phases for emergencies across EM. In addition, the CBC now executes more major procurements than any EM office, and is critical to the implementation of the EM mission. In addition to EM, other DOE organizations have reached out to the CBC. These organizations include NNSA, LM and SC. The number of Service Level Agreements between the CBC and other DOE organizations continues to grow.

In February 2012 the CBC was given another mission, line management responsibility for the EM Small Sites. This significant change marked the transition of the CBC from exclusively being a service organization. As will be discussed in more detail later in this document, we believe that the continued evolution of the CBC's mission has impacted the culture as new people join the organization, and incumbent employees seek to understand how they continue to "fit" into the evolving organization. This evolution has led to concerns by employees that they do not really know "where CBC is going." Attention should be paid to outlining the strategic vision and a strategic plan for the CBC. Until that strategic plan is developed for the CBC, it is impossible to determine the best organizational structure to carry out the CBC mission.

The basic organizational structure is nine years old, and has evolved as the mission of the CBC evolved, and new missions and functions were added. There are key elements within the organization that are performing important roles that closely align with the EM project management and contracts functions, that should be reviewed in light of the overall CBC mission and the overall EM mission. Examples include the Cost Estimating team, the Project Management Support team, the Technical Services team, and the Safety & Quality team. The addition of the "line management" responsibilities associated with the Small Sites also highlights the need for mission & function definition, workforce analysis, and the consideration of realignment.

The process model that has been used successfully in specific DOE organizations of 1. Strategic Planning (mission), 2. Workforce Analysis (human capital) and 3. Organizational Alignment (structure) is appropriate at this point in the life of the CBC. The CBC structure has grown organically since inception almost a decade ago, and the new mission sets prompt our recommendation.

III. CHALLENGES AND BARRIERS

When examining entire organizations, it is important to recognize the dynamics across the organizations, as well as the barriers and challenges facing each of them. In attempting to create an organizational identity and cohesive team, the CBC faces some unique challenges.

- **Geography.** Because of its roots in the Ohio Office, many people live a long way from the CBC. This makes extracurricular activities difficult or impossible for widespread participation. Therefore, one important tool, such as "out of hours" gatherings that can build camaraderie, are not practical for the CBC, except for very special events.

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(b)(5)

IV. MAJOR FINDINGS AND POSITIVE OBSERVATIONS

(b)(5)

(b)(5)

(b)(5)

V. RECOMMENDATIONS

Recommendation #1:

Strategic Plan - The current EMCBC Strategic Plan is three years old and much has happened since its development; it's time to update the plan. One way to mobilize positive energy is through the creation of a galvanizing vision that inspires the organization. Too many such plans are a "check the box"

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process, not a true mobilizing and inspiring endeavor. Going through this process can bond the management team and lay out a marker that builds on the already positive attitudes of those within the organization ready to move forward from "good to great."

Many organizations go through a process they call strategic planning; some because they have to, some because it sounds like the right thing to do. However, those efforts that are truly "strategic" have several common features: 1.) They are driven by the leadership team; 2.) The emerging plan is actionable the day it is complete; and 3.) The Leadership has committed itself to more than a one-day off-site pondering great thoughts. An effective strategic plan requires advance planning, analytic input, and a deep appreciation for the value of documenting a clear sense of strategic direction.

The timing for this exercise couldn't be better. The mission has grown, placing increased demands on the organization since the last plan. There are many new leaders and staff who would like a voice in the direction of the organization. There is a need, and hunger, among all of the employees for a clear sense of the future of the EMCBC. Finally, an effective, and utilized plan, can guide the organization throughout the remainder of the Administration. Developing a high-quality Strategic Plan will address the negative spectrum of the EVS results, and create a positive energy force that will jolt the CBC forward.

Recommendation #2:

Leadership - Develop and empower the Supervisors at the CBC to improve their performance in "managing, mentoring, and developing" their employees. This effort should include developing learning activities to help Supervisors address the unique challenges and stressors faced at the CBC in the modern work environment.

The decline of "Leadership" skills is a national issue, that some are calling epidemic. The CBC is not the only organization that is stretched as it continues to meet the still-relevant 20th Century requirements in a changing work environment that includes many new 21st Century stressors.

In addition to Supervisors, there are also "hybrid" roles, where a person is designated as a "Team Lead" and they have authority and responsibility for work assignment, work monitoring, and work completion, yet they are not the "supervisor" from a personnel standpoint. If not done well, the Team Lead can be solely focused on production – to the exclusion of employee development, employee health, employee work-life balance and ultimately employee job satisfaction.

"Getting back to basics" by having Supervisors complete the traditional supervisory courses is a start (formerly required for all Government Supervisors). However, as part of the Leadership culture at CBC, and the focus on the positive, it should be a priority to develop and implement learning activities and peer-to-peer groups to address the unique workplace issues faced by today's CBC Supervisors.

Recommendation #3:

Human Resources - Enhance the skills and capabilities of the HR employees to enable them to be a key component in the strategic planning initiative described in recommendation #1.

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If the strategic rebaselining described in recommendation #1 is to be implemented, HR should provide both management and employees with effective tools to support key activities like detailed manpower assessments. In addition, HR should serve as an unbiased strategic advisor to top management. It should be noted that the CBC is in the midst of filling a few key leadership positions in the HR organization, and those hiring efforts are very important. Filling those positions will go a long way toward meeting the current CBC mission, and supporting the implementation of the future HR organization. There is also the issue of how DOE wants to provide "shared services" Department-wide. In the face of these major challenges, the CBC has choices:

1.) Fill the current leadership positions, and then wait for the Departmental "shared services" decisions to be made and implemented, and then **react** to them. This would place the new leaders in a position of leading an already foundering organization for an indeterminate period while waiting to find out what will be the "new" model.

2.) Alternatively, the CBC could fill the current leadership positions, and then make CBC decisions based on the importance of the CBC mission and the services it provides (same or greater workload).

With the proactive approach (option 2), CBC would capitalize on the current leadership decisions, and promote stability, as the CBC prepares to support the Department-wide HR solutions. It would also change the focus of the group from solely being transitional support of personnel actions to assisting, and ideally pulling, the CBC strategic planning efforts forward. The existing staff may need training or mentoring by HR strategic planners from elsewhere in the Department.

Like the rest of the CBC, the HR Office needs to take care of their current responsibilities and activities. However, they need to look to the future and where their organization can be an essential part of achieving the CBC vision.

Recommendation #4:

Communications - The communications activities and tools currently utilized by CBC management should be "institutionalized" in a Communications Plan.

As noted in Positive Observation #2 above, there are many activities already underway to enable employees to communicate with management and each other. Over the past 18-24 months, the "best practices" have emerged, and the "other" efforts have withered appropriately. It is time to identify those mechanisms that will be part of the CBC culture and operations, and fully eliminate those that were not deemed suitable for further use.

These successful mechanisms should be described in a Communications Plan tailored for ease of use for all employees.

VI. NEXT STEPS

Strategic Plan - Immediately begin the development of the "Plan for the Plan (Strategic Plan)."

- Construct an outline of the strategic plan
- Identify key inputs to the development of each section
- Identify key participants
- Prepare a schedule that supports a completion date of September 30th
- Identify Action Officers and the support required to complete

Leadership - Initiate a new, action-oriented, EMCBC Leadership Development Program.

- Construct a standard for leadership capabilities – supervising, managing, mentoring, serving, providing feedback, developing team members
- Conduct an "assessment" for every person in supervisory or team lead positions to identify "gaps" and/or "opportunities for improvement"
- Establish a curriculum of activities to acquire leadership skills, for those who aspire to leadership
- Establish a Leadership Peer-to-Peer Forum (ideally more than one) for sharing, learning, and improvement
- Prepare a schedule, with resource needs, that supports a completion date of October 30th
- Identify Action Officers and the support required to complete

Human Resources - Initiate a program to identify and develop capabilities of HR employees to support the CBC strategic planning initiative.

- Identify options for roles of HR employees in development of the CBC Strategic plan
- Evaluate those options and determine optimal role of HR

Communications - Develop an Internal Communications Plan.

- Identify current internal communications activities
- Evaluate effectiveness of these activities through feedback from employees
- Finalize suite of communications activities and "institutionalize" them in CBC Internal Communications Plan
- Prepare concise standard operating procedures for the communications activities