

# U. S. DEPARTMENT OF THE INTERIOR OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

OPM-9

Transmittal Number:

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## DIRECTIVES SYSTEM

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Subject: Program Evaluation Procedures

Acting

Approval:

Title: Director, Office of Surface Mining

l. <u>Purpose</u>. This directive contains policies, procedures, responsibilities and standards for the conduct of evaluations assigned to the Program Evaluation Staff for the Office of Surface Mining (OSM). This directive covers special, functional, organizational and other evaluations as defined below.

#### 2. <u>Definitions</u>.

- a. <u>Program</u> An activity or group of activities which are organized and managed to produce a predetermined result or effect on the organization, its clients or its employees.
- b. Program Evaluation An assessment of the effectiveness of an OSM program in achieving specific goals and objectives. Program evaluations will focus on the relationship between program inputs and the resultant outcomes as well as the impacts of such outcomes upon program recipients. The focus of a program evaluation is to provide management with information regarding the utility of the program as a vehicle for achieving policy initiatives, how well the program is achieving its intended purpose, how the program influences activities for which it was designed and how the program is responding to policy and procedural guidance governing its operation. For the purposes of this directive the term program evaluation includes all of the specific types of evaluations defined in c through e below.
- c. Special Evaluation An assessment of a specific program, phenomenon, event or condition which, in the opinion of the Director, Deputy Director or Assistant Directors, merits evaluation.
- d. <u>Organizational Evaluations</u> An assessment of an organizational element's policies, organization, structure, staffing, controls, procedures and methods.
- e. <u>Functional Evaluation</u> A review of a single program function or a group of related program functions to determine the effectiveness of implementation, the adequacy of existing directives, policies, procedures or standards, the need for additional instructions and the degree of adherence to program guidance and established policies, instructions, laws, regulations and directives.

- f. <u>Director's Impact Assessment</u> An independent evaluation conducted by the Program Evaluation Staff at the request of the Director/Deputy Director to determine the effectiveness of QSM's field locations vis-a-vis its field clientele. The Director's Impact Assessments will evaluate the overall delivery of services, relationship with local, Federal, State and municipal counterparts, degree of involvement with citizens, industry, operators, environmental groups, colleges, universities, Indian tribes and congressional offices served by local field offices and technical centers.
- g. <u>Evaluation Team</u> An individual or group of individuals assigned to conduct a program evaluation.

### 3. Policy and Procedures.

a. <u>Policy</u>. It is the policy of OSM that the Program Analysis Officer, in conducting assigned evaluations under his/her responsibility, will conduct evaluations in an objective, impartial and professional manner.

#### b. Responsibilities.

- (1) The Director/Deputy Director of OSM are responsible for the general guidance of evaluations conducted by the Program Evaluation Staff.
- (2) The Program Analysis Officer is responsible for the conduct, management and control of evaluations under the jurisdiction of the Program Evaluation Staff.
- (3) <u>Assistant Directors and Technical Center Administrators are</u> responsible for cooperating with the Program Analysis Officer in the conduct of assigned evaluations.

#### c. Procedures.

- (1) <u>Objectives</u>. Specific objectives of the various program evaluations are to provide management with the following information:
- (a) Objective information regarding the achievement of program goals, the extent to which OSM's objectives are being accomplished (coordinated through OSM's Objectives Management System) recommendations for improving program operations with possible methods for initiating them and an assessment of overall costs and benefits of the program;
- (b) Recommendations for change to bring about improvement or expansion of positive program results to achieve greater program efficiencies;
- (c) An assessment of program impact on the achievement of OSM's overall mission; and
- (d) An assessment of program compliance with and/or need for change in applicable policy or procedural guidance.

- (2) <u>Preliminary Steps in the Evaluation</u>. The Program Analysis Officer in consultation with the Director, Deputy Director and Assistant Directors schedules and conducts OSM's program evaluations. Program evaluations can occur as a result of:
- (a) Regularly scheduled program evaluation as determined by the work schedule developed by the Program Analysis Officer.
- (b) Reports generated by the Objectives Management System (OMS) which indicate that a program or group of programs will not achieve the desired objective.
- (c) Unforeseen circumstances or events which come to the attention of management which indicate a program evaluation is necessary.
- (d) A request made by the Director, Deputy Director or Assistant Directors to examine certain aspects of a program's performance.
- (e) Events which come to the attention of the Director or Deputy Director which require immediate analysis.
- (f) A request made by the Secretary of the Interior, Assistant Secretary for Energy and Minerals, members of Congress (via the General Accounting Office) or other members of the Executive Branch.
- (3) Evaluation Team Composition. After receiving the assignment to conduct a program evaluation, the Program Analysis Officer will determine the resources required to conduct the evaluation. In most instances, a team of analysts will be assigned to complete the program evaluation. In most cases only one program analyst from the Program Evaluation Staff will be assigned to conduct the program evaluation. Other members of the evaluation team may be drawn, with appropriate approval, from the staff of Assistant Directors or the Director's staff offices.
- (a) The program analyst from the Program Evaluation Staff serves both as team leader and project director for program evaluations conducted under the auspices of the Program Evaluation Staff. Program Evaluation Staff members may be asked to participate as a team member in an evaluation conducted by the staff of an Assistant Director or Office Head. If this occurs, the responsibility for naming the team leader rests with the Assistant Director or Office Head initiating the evaluation. The team leader conducting evaluations for the Program Evaluation Staff in conjunction with the team members (if applicable):
- $\frac{1}{2}$  Develops the information necessary to complete the preliminary analysis of the assignment.
- $\underline{2}$  Organizes team members, team assignments and schedules preliminary meetings.

- $\underline{3}$  Organizes and develops a field contact plan (if applicable) to inform the appropriate field units which may participate or be contacted by the evaluation team.
- 4 Ensures that team members, participants and all others affected by the evaluation adhere to the policies outlined in the directive titled "Office of Surface Mining's Evaluation System."
- 5 Ensures the program evaluation is completed on schedule, informs management of the team's progress and prepares and submits the final report to management.
- (4) <u>Preliminary Analysis of Evaluations</u>. The team leader for the program evaluation will conduct the preliminary analysis of the assignment. This preliminary analysis will allow the requirements of the study to be fully analyzed before actually committing agency resources. In this capacity, the team leader will:
  - (a) Perform the initial review of the program evaluation.
- (b) Define preliminary objectives, scope and methodology of the evaluation.
  - (c) Conduct preliminary interviews with key officials.
- (d) Conduct a preliminary interview with the manager responsible for day-to-day operations of the area being evaluated.
- (e) Review previous studies conducted on the program, regulatory requirements, requirements under the Surface Mining Control and Reclamation Act of 1977 and any other pertinent information in order to fully understand the background of the program being evaluated.
- (f) Develop a preliminary cost estimate for the program evaluation.
- (5) <u>Development of the Study Plan</u>. After the completion of the preliminary analysis, the team leader will develop a formal study plan. The study plan will consist of the following elements:
- (a) <u>Background</u>. A narrative statement defining the purpose of the program evaluation, program history and current organizational situation, if applicable.
- (b) <u>Statement of the Problem</u>. A narrative statement detailing the perceived reason(s) for the program evaluation, special areas of concern, perceived problems or issues to be addressed and any management concerns uncovered during the preliminary analysis. The statement of the problem will address the following areas:
- $\frac{1}{2}$  The program evaluation will be conducted based upon previously expressed program goals or desired results.

- $\underline{2}$  Standards and criteria for program accomplishment such as expected program results as defined in a manager's performance standards and/or the Objectives Management System.
- $\frac{3}{2}$  Primary or outside sources which impact upon the program's implementation.
- (c) <u>Objectives</u>. This part of the study plan will outline the objectives of the program evaluation. Objectives of the program evaluation should summarize the information in the statement of the problem and should be stated in the form of an objective(s), i.e., they should begin with an action verb; To examine, To determine, To develop, etc.
- (d) <u>Scope</u>. This part of the study plan will expand upon the objectives in that specific areas to be addressed in the evaluation will be listed. Organizational units involved, specific information to be reviewed and program recipients to be contacted will be identified.
- (e) Methodology. This part of the study plan will describe the anticipated techniques and approaches to be employed in gathering, analyzing, organizing and presenting data for the evaluation. Any special analytical techniques to be used such as statistical models, work measurement studies, or matrix/dynamic modeling will be outlined. A discussion of the final report format is also included in this section.
- (f) Schedule Allocation of Resources and Estimated Costs. This part of the study plan will describe initial milestones for the evaluation, i.e., estimated starting time, completion of data collection, completion of data analysis, completion of draft report, revision of draft report and submission of the final report to management. Additionally, evaluation team members, if appropriate, will be identified and an estimate of the total cost of the evaluation will be calculated.
- (g) Approval. This final section of the study plan will include a provision for approval of the study plan by all concerned officials. The team leader will forward the study plan to the appropriate management officials for approval. At a minimum, the following officials should review and approve the study plan:
- $\frac{1}{2}$  Division or Branch Chief responsible for the program or organizational element being evaluated.
  - The Program Analysis Officer.
- for the program or organizational element being evaluated. 3 The Assistant Director or Office Head responsible
  - $\underline{4}$  The Director or Deputy Director.

- (6) Conduct of the Evaluation. The conduct of the program evaluation depends on such factors as the type of evaluation, scope of the perceived problem(s), sensitivity of the problem, time available to conduct the evaluation, probable impact of the evaluation, all of which must be carefully analyzed by the team leader. In most cases, specific methods and techniques to be employed in an evaluation will be detailed in the study plan. General areas of consideration, issues to be addressed and general steps of an evaluation are listed below:
- (a) Identify the primary goals and objectives of the program in as specific terms as possible.
- (b) Identify the operational goals and objectives of the program against which the outcome(s) or result(s) are tested. To the greatest extent possible, these should be explicit and measurable.
- (c) Construct a model of how the program should operate and what it should accomplish. (This can be a verbal model, quantitative model, diagrammatic model, or a mixed model. Existing policies and procedures (if any) are to be factored into the model.
- (d) Refine the statement(s) of the issue(s) or question(s)
  to be evaluated, as necessary.
- (e) Using the program model, identify the critical links or operations which are crucial in the determination of what the program achieves or produces.
- (f) Determine the criteria for measuring program success. Highlight the indicators that tell managers what the program is doing, what it is supposed to do, and which indicators are the most critical.
- (g) Identify program costs and resources consumed. Determine how costs have been distributed across individual program elements, and over specific time periods.
- (h) Specifically, determine the data to be collected as indicators of program inputs, results, processes or impacts, and which data are quantifiable by amount, time and/or series.
- (i) Select the appropriate data collection method or methods (e.g., interviews, questionnaires, reviews of records and reports, observations of events or processes, ratings by clients or beneficiaries, pre-program/post-program tests, etc.) to be utilized. Design the collection instruments and review the locations to be visited as identified in the study plan to ensure they are still valid.
- (j) Collect and analyze the data. Test the analysis against the model of expected program results outlined in (6)(c) and (6)(e). Identify the differences, and if possible, isolate the causes of the differences.

- (k) Identify alternative program approaches or alternative methods of achieving the program results. Test these methods against the program model.
- (1) Conduct interim briefing with appropriate Assistant Director or Office Head to discuss issues which may require prompt attention.
- (m) From the analysis performed, identify the significant conclusions of positive program effects and any problems to be corrected.
- (n) Develop recommendations for management's review to solve problems or implement more effective program approaches. Develop possible implementation decisions/plans for each recommendation.
- (o) Indicate actions to monitor future program progress, and any revisions to program data collection in order to facilitate future monitoring and evaluation efforts.
  - (p) Develop first working draft of the report.
- (7) <u>Final Report Contents</u>. The final report contents will be designed to meet the needs of client office. Generally, the final report will contain the following sections: executive summary, background, discussion, conclusions, recommendations (with options if appropriate).
- (8) Final Report Clearance. Once the draft report is completed, the Program Analysis Officer will circulate it to the appropriate Assistant Director or Office Head for review. Two weeks will be allowed for this review, at which time the Assistant Director or Office Head should prepare a written response regarding the contents of the report. This response should address any differences regarding findings, conclusions, recommendations, etc. and provide alternative language and justification for a different course(s) of action.
- (a) The response should indicate which report recommendations are accepted as stated and which recommendation should be modified with an appropriate explanation. Recommendations already implemented should be so identified.
- (b) When this review is completed, it is forwarded to the evaluation team for analysis. The evaluation team will complete its review within 15 working days.
- (c) When the evaluation team has completed its analysis, the principals will meet to discuss the feasibility and policy implications of implementing recommendations. If at all possible, a concensus regarding recommendations to be implemented should be reached at this time.

- (9) Submission of the Evaluation to the Director/Deputy Director. The final report with the conclusions and recommendations endorsed by the evaluation team will be submitted to the Director/Deputy Director for review and approval. Dissenting viewpoints will also be included. If there is a disagreement as to whether a recommendation Should be adopted, the Director/Deputy Director will make the final decision.
- (10) Implementation of Recommendations. Procedures and target dates for implementing recommendations will be developed by the office principally affected by the report and the evaluation team. Recommendations that can be implemented within 1-2 weeks and do not require development of new policies, programs and/or procedures will be included on DIMS so that implementation progress can be monitored.
- (a) Recommendations which require additional time to implement (those which require development of new policies, procedures and/or programs) will be monitored by the Program Evaluation Staff. Target dates for implementing the recommendations will be developed by the evaluation team and the client office.
- (11) Accessibility of Information. During the course of an evaluation, it may be necessary to have access to sensitive/confidential information. It is the responsibility of all OSM managers to cooperate with the evaluation team and honor requests for information relating to the evaluation.
- (12) Evaluation Files. All information, background material, numerical data, etc. will be kept by the Program Evaluation Staff for future reference.
- 4. Reporting Requirements. The Assistant Director or Office Head principally affected by report conclusions and recommendations is required to provide written comments to the evaluation team no later than two weeks after the report is submitted for review.
- 5. References. None.
- 6. Effect on Other Documents. Directive "Clearance of Evaluation Reports" Chapter 25, Section Ol, dated February 15, 1980, is obsolete.
- 7. Effective Date. Upon issuance.
- 8. <u>Contact</u>. Program Evaluation Staff, Office of the Director, (202) 343-4781 or FTS 343-4781.