REPORT OF THE TRANSITION TASK FORCE FOR THE NATIONAL ENFORCEMENT TRAINING INSTITUTE

UNITED STATES · ENVIRONMENTAL PROTECTION AGENCY

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Executive Summary

The National Enforcement Training Institute (NETI) was organized into the Office of Compliance (OC) in January 2005, at which time Director Michael Stahl established a NETI Transition Task Force (TTF) charged to examine various issues associated with training for EPA's national enforcement and compliance assurance program. The TTF, comprised of 12 members (eight from NETI's staff, one OC staff member, and one Regional representative each from Regions 1, 3, and 5), met and deliberated the issues and developed findings and recommendations over the period of December 2004 through February 2005. Approximately 30 stakeholders also provided input on these issues. Following is a summary of the findings and recommendations of the Task Force.

Part I: Identify NETI's key accomplishments over the last 5-10 years and the factors that helped produce those accomplishments.

The TTF found that since its inception in 1991, NETI has developed and delivered quality training to meet program needs, increased information access and availability of training, and has created an enforcement training community within EPA. These accomplishments came as a result of staff knowledge, skills, and abilities, resources to support initiatives in NETI's formative years, and leadership within OECA which helped to build a solid organizational foundation.

Part II: Identify the emerging training needs of the national enforcement and compliance assurance program over the next 3-5 years.

Although a scientific survey was not completed for this report, nor are training needs systematically assessed nationally, Task Force members and stakeholders readily identified areas of needed training: continued basic and core training, media-specific and specialized training, and continuing to provide training to state and tribal partners.

Recommendations:

1. NETI will report the extent to which the needs identified in the Task Force process are being addressed currently, based on information already available to NETI.
2. Enforcement managers shall direct NETI to carry out a regular, systematic national training needs assessment.
3. NETI will continue to develop partnerships, particularly with external organizations, to provide training to state, local, and tribal agencies.

Part III: Describe the state of training in the national enforcement and compliance assurance program, NETI's role in it, and opportunities for enhancing NETI's role.

The TTF found that enforcement training at EPA is decentralized – each OECA and regional office takes responsibility for training for its program areas. Stakeholder responses also indicated that there are differing views of NETI's role in the training program. There was also

consensus that there is no national strategic plan for training, nor a single source for training schedules and information in the enforcement program.

Recommendations:

4. NETI will undertake a pilot study to identify initial bench marks and best practices in collecting information that would be used for a future, comprehensive look at the state of training.
5. NETI will strengthen its role as a national "clearinghouse" of training information, with the cooperation of OECA and Regional offices in providing NETI with course information.
6. Enforcement managers shall create a Training Planning Council, with representatives of the enforcement program offices and disciplines, under NETI's leadership, to prepare a two-year strategic plan for training that convenes on a schedule that coincides with the annual OECA planning process. The plan should be provided to national enforcement program managers for their review and approval.
7. NETI will continue to fulfill its existing roles to aid others on training development, deliver classroom and distance training, provide training delivery support, collect and maintain a database of course information.

Part IV: Examine the current delivery modes for training and review their cost-effectiveness.

OECA employs a mix of training delivery methods, including classroom and distance learning platforms. There are advantages and disadvantages to both classroom and asynchronous, or distance learning, training. While technologies may reduce the overall cost of training, the majority of stakeholders prefer classroom instruction. The industry trend is toward distance learning but experts find that the right delivery method varies on many factors.

Recommendations:

8. NETI will continue delivering the preferred, classroom-based training, using cost-effective strategies.
9. NETI will provide leadership in using distance learning technology by keeping abreast of Agency solutions.
10. NETI will explore cost-effective technologies to produce distance courses, specifically reviewing existing CD/ROM courses for conversion to the web.

Part V: Describe how NETI currently measures and reviews its performance and identify alternative ways (if any) that performance might be evaluated.

The Task Force agreed that NETI measures and reviews the enforcement training program primarily through output measures. The use of outcome measures, such as course evaluations, are not standardized nor used for overall program evaluation, and enforcement training evaluation data is incomplete.

Recommendations:

11.   NETI will convene a workgroup comprised of representatives from NETI, OECA, and Regional offices that will develop and recommend performance measures for the enforcement training program.

Part VI: Identify the organizational strengths or assets that will help in meeting the emerging training needs, as well as the most significant barriers or challenges that will make it difficult to meet these needs.

The Task Force found, and stakeholders agreed, that the staff within NETI is its greatest strength and that NETI has the infrastructure for a first-quality training program. Barriers or challenges to meeting emerging training needs include NETI's limited resources, the need for additional continuing education for its staff, and a misunderstanding of NETI's role within OECA.

Recommendations:

12.   NETI will endeavor to gain management support for priority training projects and explore cost sharing opportunities and partnering with other organizations.

13.   NETI will seek to build staff expertise through various methods, and details and rotations from outside of NETI to supplement NETI staff expertise.

14.   Other recommendations in this task force report will be implemented to clarify NETI's role and strengthen its organizational standing.

Report of the NETI Transition Task Force
March 2005

PURPOSE AND METHODOLOGY

The National Enforcement Training Institute (NETI) was organized into the Office of Compliance (OC) in January 2005. In bringing NETI into OC, Director Michael Stahl established a NETI Transition Task Force charged to examine various issues associated with training for EPA's national enforcement and compliance assurance program (detail of the charge at Appendix 1). The Transition Task Force (TTF) comprised twelve members: eight from NETI's staff, one OC staff member, and one Regional representative each from Regions 1, 3, and 5. The Task Force met and deliberated the issues, and developed findings and recommendations over the period of December 2004 through February 2005. The Task Force members considered the questions posed by the charge and reached out to approximately 80 stakeholders for input on these issues; over 30 stakeholders provided responses (stakeholder input at Appendix 2). This report of the Task Force is organized in six parts around the six inquiries posed to the TTF. Each part begins with a re-statement of the "issue," followed by a brief summary of the Task Force findings, and recommendations, if any.

NETI BACKGROUND

NETI was first organized under provisions of the 1990 Pollution Prosecution Act. NETI's mission, as set forth in Section 204 of the Act, provides in pertinent part:

> "It shall be the function of the institute to train federal, state, and local lawyers, inspectors, civil and criminal investigators, and technical experts in civil and criminal enforcement of the nation's environmental laws."

The Institute was formed in the Office of Enforcement, the predecessor to the Office of Enforcement and Compliance Assurance (OECA). The current re-organization into OC was recommended by the December 2003 Management Review of the Office of Criminal Enforcement, Forensics, and Training, NETI's organizational home for the preceding eight years. The report of that Management Review stated, "This consolidation of mission would strengthen both the NETI program and the training program in the Office of Compliance and make better use of existing knowledge, network and infrastructure for supporting the program."

From NETI's inception, its managers and staff have viewed the Institute's role as having broad responsibility for ensuring that training is provided in all aspects of environmental enforcement, regardless of program or jurisdiction, to all disciplines whose job descriptions involve enforcing environmental laws and regulations. In sheer numbers of personnel and breadth of skills and knowledge covered, this has been a daunting assignment. Indeed, NETI's greatest challenge has been attempting to reconcile the expectations of this mission with the reality of its resource levels and organizational influence. The sections that follow discuss NETI's efforts to date in fulfilling this role and current thinking regarding NETI's role in the future.

PART I: NETI CONTRIBUTIONS TO THE NATIONAL ENVIRONMENTAL ENFORCEMENT PROGRAM

Issue: Identify the NETI's key accomplishments over the last 5-10 years and the factors that helped produce those accomplishments.

An effective environmental enforcement and compliance assurance program requires a skilled and knowledgeable workforce, which comes, in part, from training. Over the past fifteen years, NETI has strengthened the Agency's national program for training environmental enforcement and compliance assurance professionals by building a training infrastructure, organizing support systems, and delivering quality courses. In reviewing these accomplishments, the Task Force members agreed that NETI has already accomplished a great deal, and yet more could be done to enhance and expand the national environmental enforcement training program.

Finding: NETI has developed and delivered quality training to meet program needs

In just the past three years, 6,471 students have taken training developed and directly sponsored by NETI. To highlight some of these offerings: NETI trained 704 inspectors in classroom deliveries of the Basic Inspector Course; 255 inspectors have attended the new Advanced Inspector training; and 257 students were trained in Advanced Negotiation Skills. Criminal investigator training was provided to over 2,000 students at the Federal Law Enforcement Training Center (now part of the Criminal Investigation Division). Over 4,600 students have taken computer-based courses such as Environmental Statutes Review and Putting It Together (case development training). NETI sponsors Enforcement Teamwork training, a week-long, residential course that presents an overview of the enforcement process and emphasizes working as teams. In cooperation with the Office of Compliance, NETI launched a web-based version of the Basic FIFRA Inspector Training on its website, NETI Online. NETI has worked cooperatively on training efforts with EPA Regions to meet special needs, for example NETI worked with Region 5 and the Midwest Environmental Enforcement Association (MEEA) to develop and conduct petroleum refining process training.

Finding: NETI has increased information access and availability of training

It is through NETI's efforts over the past ten years that a database of existing enforcement and compliance assurance courses has been organized and is available to enforcement personnel nationwide. Beginning with its catalog of courses issued since the late 1990's to the on-line catalog available today, listing 88 courses in 2005, NETI has compiled training information to make it available to the enforcement community. Since 1998, NETI has disseminated monthly updates of course schedules to approximately one thousand professionals nationwide.

In addition to regularly scheduled classroom courses, NETI offers easy access to web-based full-length and short courses on NETI Online. NETI also maintains an inventory of nine CD/ROM courses.

Training is available to state and local personnel through course offerings funded by grants to state organizations. State and local personnel also participate in training funded by NETI and the Regions - free of charge. Working with state partners NETI has sponsored courses such as Science for Prosecutors to fulfill needs expressed by state and local practitioners.

Two state-of-the art training facilities, which include mock courtrooms, operate at EPA Headquarters and in Lakewood, CO. The Colorado site now includes a practical exercise site (former industrial plant) customized for inspector/investigator training. These facilities host nearly 25,000 students and meeting participants each year, at no cost to the sponsor.

NETI recognized the opportunities available in the developing Internet, and built its own web-based training site/learning management system, NETI Online. The system has provided registration, course management, student services, and on-line courses since 2000, with over 8,500 currently active users.

NETI collects and maintains training statistics on course deliveries and student participation. The statistics are used for an annual report of training activities, and to compare accomplishments and assess certain trends over time.

NETI also collected data on training needs through the MOA planning processes as well as surveys conducted in the past at the direction of the OECA Deputy Assistant Administrator.

Finding: NETI has created an enforcement training community within EPA

As NETI staff have gone around the country delivering training and working with training partners from the states, they have identified and developed a cadre of state and EPA instructors who can be tapped for training nationwide. Annually NETI acknowledges these outstanding partners by presenting the "NETI Training Partner of the Year" award.

Over the past several years, NETI has built a network of EPA regional and OECA training contacts who have been meeting regularly to exchange information and cooperate on training activities and developments. Also in the past year, NETI has compiled and distributed to this network a regular newsletter highlighting the training accomplishments of network members.

FACTORS THAT HELPED PRODUCE THESE ACCOMPLISHMENTS

Finding: Staff knowledge, skills, and abilities are key to accomplishments

These accomplishments are most directly due to the outstanding contributions and commitment of NETI's staff over the years. It begins with the NETI staff who designed,

and now manage and maintain NETI facilities. NETI has had talented training designers, developers, managers, and instructors. NETI has attracted staff with technical expertise who oversaw development of early computer-based training efforts, and ultimately designed, developed, and now maintain NETI On-line.

Two attributes of staff have played a significant role in NETI's success to date. One is the willingness of all NETI managers and staff to embrace innovation, especially in employing technology in training delivery and making training cost-effective and widely available. The second quality is the customer service orientation of NETI's staff. Most of the progress that NETI has made in collecting and disseminating training information, in developing a training network, and in producing reports of training statistics and accomplishments is the result of the staff's personal contacts throughout the national program. This also extends to the commitment to service evident in the operation of NETI's training facilities and course deliveries.

Finding: Resources supported initiatives in formative years

During the mid-1990's NETI was able to achieve the advances noted above with funding devoted to technical and other initiatives. There was contractor technical support for developing new courses and producing computer-based training. Support was also directed to designing and building NETI Online. In addition, NETI was able to foster increased training development and delivery through interagency agreements, grants, and cooperative agreements with partner organizations such as the four state environmental associations.

Finding: Leadership built a solid organizational foundation

When NETI was formed, the leadership of managers and cooperation of other offices gave NETI a strong foundation to build upon. Important early support came also from the NETI Council, made up of EPA headquarters, regional, and state representatives, which provided feedback and guidance in shaping the early organization of NETI.

PART II: TRAINING NEEDS AND TRENDS

Issue: Identify the emerging training needs of the national enforcement and compliance assurance program over the next 3-5 years.

NETI Transition Task Force members and training stakeholders readily identified areas of needed training. A number and variety of specific needs were cited, and although these represent the perspectives of particular individuals and small groups, certain strong themes emerged, i.e. that training is critical to the national program in these ways:

- Assures a well trained work force that provides appropriate, competent and consistent interactions with the regulated community.

- Provides for a continuing education that maintains competency and develops new competencies, especially with new technologies and new program emphases.

- Provides for continued training of new and inexperienced work force personnel.

- Prepares for the loss of expertise due to retirements, transfers, and attrition.

Finding: Need for continued basic and core training

Over the next three to five years, EPA, states, and tribes expect to lose a large number of experienced inspectors, investigators, chemists (i.e., laboratory personnel), and attorneys to retirement. Some estimates are as high as 35% of the remaining experienced inspectors will be lost. States are reporting the potential loss of 10-20% of their middle and upper management personnel in all areas. This expected turnover points to the continuing need for courses that teach the fundamentals of enforcement and compliance assurance to new personnel.

Furthermore, static funding levels will constrain new hiring. In order to continue to meet staffing needs of the program, it is likely that on-board staff will have to be re-trained or cross-trained, again calling for core training.

It will be necessary to train inexperienced inspectors and investigators so as to impart the tacit and explicit knowledge, techniques, current procedures, and best practices of inspections.

Generally, program managers must be vigilant about liabilities that result from inadequate training. The strength of enforcement litigation and administrative actions, for example, can be jeopardized by inadequately trained attorneys. Case development and government prosecutor training (e.g., Science for Prosecutors, ethics training, court room procedures, Administrative Hearings and Trials, Rule Making Process) should be scheduled and provided on a regular basis to ensure a trained and skilled legal staff. A key feature of this training is the hands-on practice afforded the students in a learning setting. Government witnesses benefit from witness preparation training.

Compliance assistance providers seek training in basic aspects of compliance assistance, as well as inspection protocols. Civil investigators should receive basic investigator training.

Feedback from the NETI Basic Inspector Training and Advanced Inspector Training courses and the Annual Inspector Workshops indicates a perception among EPA instructors, inspectors, and some managers that there is inconsistency in the ways the Regions target, plan, conduct, document and respond to findings from EPA compliance inspections and compliance evaluations. A nationally consistent training program can help to address and minimize these inconsistencies, improve overall compliance

monitoring and enforcement program activities, and obtain better quality national compliance data.

Finding: Need for media-specific and specialized training

Ad hoc, specialized training on new and emerging issues should be developed and provided to Federal, state, local, and tribal lawyers, inspectors, civil and criminal investigators, and technical experts to ensure that all enforcement personnel are current on topics such as new initiatives, targeting training, environmental justice, and compliance assurance procedures/guidance, among others. Media and sector based training should be scheduled and provided on a regular basis to field the maximum number of trained inspectors in the various media. In particular, training is needed to support the designated National Priorities.

Feedback from the NETI Basic Inspector Training and Advanced Inspector Training courses, the Annual Inspector Workshops, and contacts with state personnel indicate that large numbers of inspectors need technical training and training in special initiatives (e.g., Bevel amendment application for the mineral mining industry). Senior inspectors and those inspectors who are moving into performing multi-media inspections require courses such as NETI's Advanced Inspector Training Course and the Multi-Media Inspector Training Course. Civil investigators need specialized training (e.g., in money laundering, asset location, and basic computer forensics).

Inspectors, in particular, seek training to understand new and developing environmental technologies, as well as training in use of technology to support their work.

Finding: Continuing need to train state and tribal partners

The majority of inspections and the primary workforce for the national enforcement and compliance assurance program come from the states. Tribes also maintain enforcement programs for their lands. EPA has historically acknowledged an obligation to support these programs through training. Under its statutory mission, NETI provides training to state, local, and tribal inspectors and compliance assurance personnel to the extent possible through its courses; however, a significant means of training for these non-Federal inspectors and compliance assurance personnel is partnerships with organizations such as the four regional environmental enforcement associations. These partnerships need adequate funding to provide the necessary training to foster a competent tribal and state enforcement and compliance assurance workforce.

Finding: Training needs are not systematically assessed nationally

It is important to note that the preceding list of needs comes mostly from intuition and observation, rather than from a scientific survey of training needs. Although some EPA Regions and other organizations (e.g. state groups such as the four regional enforcement associations and STAPPA/ALAPCO) undertake training needs assessments for their particular communities of interest, the national enforcement program does not have a

comprehensive assessment of training needs. Undoubtedly there would be benefit in an effort to systematically collect, review, and analyze data about training needs in order to validate the basis for planning and developing training offerings.

<div align="center">RECOMMENDATIONS</div>

1. NETI will report the extent to which the needs identified in the Task Force process are being addressed in the short-term, based on information already available to NETI.

2. Enforcement managers shall direct NETI to carry out a regular, systematic national training needs assessment in order to form the basis for planning and developing training offerings.

3. NETI will continue to develop partnerships, particularly with external organizations, to provide training to state, local, and tribal agencies.

PART III: STATE OF TRAINING

Issue: Describe the state of training in the national enforcement and compliance assurance program, NETI's role in it, and opportunities for enhancing NETI's role.

Finding: Enforcement training is decentralized

Training within the enforcement and compliance assurance program is decentralized – each OECA and regional office takes responsibility for training resources and activities for its program areas. Consequently, there are hundreds of training events sponsored in a year (Regions reported nearly 300 training activities to NETI in FY2004), but no single body of knowledge exists for the national program, nor could this Task Force definitively describe the "state of training" in entirety. Clearly, there are advantages to decentralization, such as allowing those professionals closest to policy-setting and program implementation to determine and address training needs. The primary disadvantage is the potential for redundancy. Information sharing and consistency can also suffer in decentralized models.

Acknowledging this finding resulted in some of the most provocative discussions of the Task Force. A comprehensive picture of enforcement and compliance assurance training seemed desirable; however, gathering that information across all of the program would be difficult and controversial. Stakeholders expressed concern that efforts to centralize information collection might lead to infringement on decisions of individual offices to provide training as they deem necessary.

Capturing a complete picture of national enforcement and compliance assurance workforce training in the form of a *state of training* report would provide a detailed

assessment of the effectiveness of training and provide benchmarks for future progress. A study would gather information about the training universe and characteristics, then follow up by continually reassessing training program performance. The report could also better define the roles of each organization, including NETI, in the training of enforcement professionals.

Finding: There are differing views of NETI's role

A number of stakeholder responses demonstrate differing views of what NETI's role is in the enforcement training program versus the view of other OECA offices. There also seems to be a differing view between that of Headquarters and Regional offices as to what role NETI has, or should have, in enforcement training. For example, Regions generally support a NETI-managed training clearinghouse, while Headquarters commenters questioned this premise.

NETI has understood its role, as stated earlier, as responsibility for ensuring that training is provided in all aspects of environmental enforcement, regardless of program or jurisdiction, to all disciplines whose job descriptions involve enforcing environmental laws and regulations. Over the years NETI has developed its infrastructure and undertaken activities to implement this role as it was understood by NETI managers and staff.

- NETI Online contains profiles of over 100 training courses sponsored by Headquarters, Regions, and grantees, available to prospective students.

- NETI provides direct training support, using NETI FTEs to conduct classes, participate in the design and development of new courses, and maintain facility support.

- NETI provides indirect training support for OECA and Regional courses, including the use of NETI Online to advertise courses, register students, present web-based training modules, provide statistical reports of training activities, and to serve as a central repository of data about NETI-sponsored courses.

- NETI supports a cross matrix of media programs (air, water, hazardous waste); a mix of job skills (inspectors, attorneys); uses various delivery methods (classroom, web-based, CD/ROMs); and works with various sponsors and partners (Headquarters, Regions, and state associations).

Finding: There is no national strategic plan for training

Task Force members bemoaned the lack of a strategic approach to planning and delivering training. Members felt that, at minimum, this undermines coordination among the various offices in sharing expertise and training resources. More important is the need to ensure that training aligns with enforcement strategies and implementation plans. Given the extensive list of training needs discussed in Part I of this report, and the finite

resources for training funding, instructors, student time, and travel costs, a strategic approach at the national level should both maximize use of limited resources and ensure priority needs are met.

A list of subjects for training courses does not go all the way in satisfying needs. As one stakeholder commented, "Perhaps the question isn't so much 'what type of training will be needed in the next decade and beyond,' but rather 'is NETI structured and equipped to adequately deliver the necessary training to those with the greatest need'?" Supervisors and potential students need to be able to plan to get training when they need it. Instructor-led courses should be scheduled well in advance (one year in advance is desirable for courses such as Basic Inspector training) at various locations to provide maximum national coverage. Providing web- and computer-based training should also be explored and produced.

Finding: There is no single source for training schedules and information

Finally, related to developing a training plan that allows personnel to plan ahead for training, the information about training offerings needs to be readily available. The Task Force members and stakeholders agree that a single source of training information would be a real improvement to effective use of limited resources. There is also consensus that NETI should expand its efforts to provide this service. In order to accomplish this, the Task Force members agreed that NETI would need cooperation from other OECA offices and the Regions to provide this information to NETI.

RECOMMENDATIONS

4.   NETI will undertake a pilot study to identify initial bench marks and best practices in collecting information that would be used for a future, comprehensive look at the state of training. The pilot activity could be limited in scope to a smaller training segment, such as IT-related skills for enforcement inspectors, to be able to hone the techniques and methodologies of benchmarking.

5.   NETI will strengthen its role as a national "clearinghouse" of training information, providing a central location of enforcement and compliance assurance training course schedules and sources for training, with the cooperation of OECA and Regional offices in providing NETI with course information.

6.   Enforcement managers shall create a Training Planning Council, with representatives of the enforcement program offices and disciplines, under NETI's leadership, to prepare a two-year strategic plan for training. The council should convene on a schedule that coincides with the annual OECA

planning process. The plan should be provided to national enforcement program managers for their review and approval. The plan should:

- Address training needs aligned with enforcement and compliance assurance national strategies, and consider training needs assessments and workforce deployment information.

- Determine national training priorities, project resource requirements and offer creative approaches to cover both financial and human resource needs, and assign lead roles for development and delivery of priority training projects.

7. NETI will continue to fulfill its existing roles to aid others on training development, deliver classroom and distance training, provide training delivery support, collect and maintain a database of course information.

PART IV: DELIVERY METHODS

Issue: Examine the current delivery modes for enforcement and compliance assurance training and review their cost-effectiveness.

Findings: OECA employs a mix of training delivery methods

OECA currently provides a mix of classroom and distance learning training. Distance learning can be accessed at any time and includes self-study, web-based courses. (See Appendix 3 for glossary of delivery methods.)

- In FY2004, 76.5 % of our students attended instructor-led courses and 23.5% of students were trained in a non-classroom environment.

- NETI Online supports several distance learning training courses, which include Timely Training Topics, web-based training courses, videos, and CD/ROM courses.

- NETI instructional CD/ROMs were developed several years ago with in-house contracted resources.

Findings: There are advantages and disadvantages to classroom training:

Advantages:

- Can be highly interactive; promotes relationships and students gain from live discussions and feedback.
- Easier to evaluate whether learning has occurred
- The speaker's tone and style come through well
- Often easier to develop

Disadvantages:
- Can be very expensive to deliver
- Scheduling can be difficult and may require several sessions to reach everyone
- The case of "live - broadcasting" can require complex technologies such as satellite receivers and may require large bandwidth.

Findings: There are advantages and disadvantages to asynchronous training:

Advantages:
- Easier to distribute to large audiences.
- "Desktop, anytime"; students can access where and when they want
- Conveys a standard message
- Ability to skip topics that are already understood or mastered

Disadvantages:
- Lacks inherent interactions
- Can have a high dropout rate
- Can be difficult to evaluate learning/monitor trainees' progress
- Can be costly to develop

Findings: Technologies may reduce overall cost of training

Technology makes it possible to significantly reduce travel costs to offer some types of training. Emerging technologies include the use of e-Learning/e-Seminar events (such as the delivery tool "WebEx"), where users enter a URL to "see" the presentation and teleconference the audio portion of the event. Also, the Agency has satellite broadcasting and video teleconferencing capability.

Finding: The majority of stakeholders prefer classroom instruction

The enforcement program is staffed by "professional" employees, such as attorneys, who feel they benefit most from interaction with an instructor. An advantage of classroom-based instruction for geographically dispersed enforcement and compliance assurance personnel is promoting personal interaction among colleagues about their specialties. Getting together, face-to-face, affords networking opportunities and transfer of

knowledge between Federal, state, tribal and local environmental enforcement personnel. The majority of stakeholder comments express this preference.

Finding: The industry trend is toward distance learning

The industry trend is toward *distance learning* and perhaps more accurately, *blended learning*, which affords the benefits of classroom instruction with the convenience and advantages of distance training, by combining aspects of online and face-to-face instruction.

- American Society of Training and Development (ASTD) cited in its *2003 State of the Industry Report* that classroom training (as a percentage of delivery methods) has decreased over the past four years and is projected to continue to decline.

- *Training Magazine*'s 22nd Annual Industry Report (2003) stated that instructor-led classroom training accounted for 74% of all training in 2002 but dropped to 69% in 2003.

Finding: The right delivery method varies

The Hay Group, in their *Best Practices of Leading Training Programs Report* submitted to EPA's Air Pollution Training Institute in December 2004, assessed exactly these issues. Based on a survey of training organizations, the Hay Group determined that in general, "there are no hard and fast rules for making decisions about which training delivery media to use. Often the decision is a pragmatic one that is based on the time available and money or other resources needed to develop and deliver the training program."

- Criteria to be used can include the complexity of the material, need for interaction, requirements for validation and/or certification, training audience, goals of the program, budget and time.

- The Hay Group also concluded, "when the outcomes of training are to analyze, synthesize, or evaluate, or when poorly defined problems are the focus, more synchronous [e.g. classroom] delivery methods work best. When the outcomes of training are to provide procedural or well-defined information, or when providing regulation updates, the training methods should be more asynchronous [e.g. on-line]."

RECOMMENDATIONS

8.   NETI will continue delivering the preferred, classroom-based training, using cost-effective strategies.

9.   NETI will provide leadership in the enforcement and compliance assurance program in using distance learning

technology by keeping abreast of Agency solutions such as IP Multicasting, Lotus LearningSpace Virtual Classroom, and Macromedia Breeze Live meeting software.

10. NETI will explore cost-effective technologies to produce distance courses, specifically reviewing existing CD/ROM courses for conversion to the web, with interactive capabilities that engage the trainees.

PART V: EVALUATION

Issue: Describe how NETI currently measures and reviews its performance and identify alternative ways (if any) that performance might be evaluated.

Finding: NETI measures and reviews the enforcement training program primarily through output measures

Historically NETI has evaluated the OECA enforcement training program by collecting and analyzing data after the end of each fiscal year and then publishing the results in an annual report. Recently NETI has also collected data from the Regions as well. Data collected includes:

- number of students trained by OECA
    1. by employer (Federal, state, etc.)
    2. by OECA office (OC, OSRE, etc.)
- number of course deliveries held by OECA by delivery method (classroom v. distance)
- number of participants in each NETI facility
- number of students trained by Regional offices
- number of course deliveries held by Regional offices.

In the past, GPRA and NPMS measures for the training program were also output measures (e.g., number of state and local personnel trained). While capturing statistics such as these have value, numbers only tell part of the story.

Finding: The use of outcome measures, such as course evaluations, are not standardized nor used for overall program evaluation

To evaluate its classroom courses, NETI currently asks students to complete a Level 1 ("Reactions") Evaluation Form for its courses, also known as a post-course evaluation or "smilesheet." Most of the NETI instructors are using the input received to improve future course deliveries.

The training industry standard for evaluation is the Kirkpatrick model, a course evaluation model that recommends four levels (see Appendix 4). NETI has considered Level 2 ("Learning") evaluations, such as pre- and post-tests, and Level 3 ("Transfer")

evaluations, such as 3-month follow-up surveys with students. NETI has not used these to date, due in part to Paperwork Reduction Act concerns that prohibit follow-up surveys of non-Federal students.

Of the stakeholders that responded to this issue, about two-thirds indicated that pre- and post-tests and/or follow-up evaluations to determine whether job performance was improved as a result of training was needed. Several suggested using an automated system such as NETI Online to assist in this process.

Finding: Enforcement training evaluation data is incomplete

Enforcement training is decentralized among Headquarters and the Regional offices, and output data is submitted on a voluntary basis to NETI. NETI staff reviews and summarizes what is received, but believes that not all training activities are being reported; thus the annual report may be incomplete. Outcome data, such as course evaluations, may be used by other OECA offices but that information is typically not shared with NETI.

<div align="center">RECOMMENDATION</div>

11.   NETI will convene a workgroup or committee comprised of representatives from NETI, OECA, and Regional offices that will develop and recommend performance measures for the enforcement training program. The group shall review current data collected, including both output (such as current "bean-counting" numbers) and outcome (such as course evaluations) information. The group shall also develop and recommend any new tools needed for further evaluation and how those tools would be implemented.

PART VI: STRENGTHS AND BARRIERS

Issue: Identify the organizational strengths or assets that will help in meeting the emerging training needs, as well as the most significant barriers or challenges that will make it difficult to meet these needs.

Finding: The staff within NETI is its greatest strength

The staff of NETI show personal dedication to NETI and its mission as well as to each other – there are personal relationships and camaraderie among staff members. These individuals have a thorough knowledge of NETI's mission, as well as their individual duties and responsibilities for accomplishing that mission and are also willing to help one another achieve the mission of NETI. Most are self-directed and carry out their assigned duties and responsibilities without close supervision. Almost half of the stakeholders that responded to this question echoed these characteristics: the staff members' positive attitudes and their ability to network are strengths of the organization.

Finding: NETI has built the infrastructure for a first-quality training program

As mentioned at the outset, NETI has in place a framework for an effective training program:

- state-of-the art facilities in Headquarters and Lakewood, CO, including a new practical exercise site

- systems for developing and delivering classroom and computer-based courses;

- NETI Online, a web-based interactive system that houses user registrations, course information, delivery information and statistics, and computer-based training; and

- a network of personnel involved in enforcement and compliance training.

Stakeholders wholeheartedly agreed with this assessment, mentioning NETI Online, the NETI facilities, and development and delivery of training as effective elements of NETI's program. Other strengths mentioned included NETI's statutory mandate, its position as a national organization, and its focus solely on training.

Finding: NETI encounters barriers or challenges to meeting emerging training needs

Limited resources hamper NETI's ability to meet fully the needs identified. Funds are needed to develop and present new courses -- whether classroom or distance delivery; to establish a schedule of course deliveries in advance adequate to meet needs; and to train and develop staff in order to keep up with new developments and technologies that ensure cost-effective, quality training. NETI has seen its operating funding drop 45% from FY2000 to FY2004. Over half of the stakeholders that responded to this question supported the perception that NETI lacks sufficient funding for its mission.

NETI's role as designer and developer of new training would benefit from enhancing the experience and depth of its training design and development staff. In addition, since many staff came to NETI from environmental programs but now lack current knowledge and expertise in various media areas, NETI needs assistance from subject matter experts from offices with media responsibilities to produce new training courses.

Within OECA there is organizational resistance to or misunderstanding of NETI's role. Some perceive that NETI's primary function is to serve as a "conference center" for training and meeting rooms. Several stakeholders mentioned that they are not sure which courses NETI has the responsibility for developing and delivering, or believe that "sometimes [NETI] strays from its mission by assuming responsibilities not assigned within OECA."

12.   NETI will endeavor to gain management support for priority training projects and explore cost sharing opportunities and partnering with other organizations.

13.   NETI will seek to build staff expertise through various methods, including rotational and detail assignments, educational classes, and memberships in professional training organizations for the NETI staff, and details and rotations from outside of NETI to supplement NETI staff expertise.

14.   Other recommendations in this task force report will be implemented to clarify NETI's role and strengthen its organizational standing.

CONCLUSION AND ACTION PLAN

The members of the NETI Transition Task Force seek the endorsement of managers of the national enforcement and compliance assurance program for these recommendations.

Implementation of the 14 recommendations of the NETI Transition Task Force will have outcomes that, going beyond a statement of NETI's role, will improve the effectiveness of the national enforcement and compliance assurance program.

Task Force members see the potential for the national enforcement and compliance assurance program to realize cost-savings from these proposals by developing a strategic plan for training, strengthening information sharing about training events across the national program, and pursuing cost-effective delivery methods. In addition, the proposed strategic training plan and training information clearinghouse can give assurance that priority training needs are met.

Finally, the many comments from stakeholders have not only informed the deliberations and recommendations of the Task Force, but provided numerous good ideas in specific areas that NETI will pursue independently of the Task Force actions.

Following is a summary table of recommendations and initial action plans.

RECOMMENDATION	ACTIONS
Part II: Training Needs and National Trends	
1. NETI will report the extent to which the needs identified in the Task Force process are being addressed in the short-term, based on information already available to NETI.	NETI staff are currently assembling a report on the needs identified through the Task Force process.
2. Enforcement managers shall direct NETI to carry out a regular, systematic national training needs assessment in order to form the basis for planning and developing training offerings.	Upon management's direction, NETI will work to develop a needs assessment process, to be implemented in FY 2006.
3. NETI will continue to develop partnerships, particularly with external organizations, to provide training to state, local, and tribal agencies.	NETI will broaden efforts to arrange partnerships, especially those with mutual resource benefits. Ongoing
Part III: State of Training	
4. NETI will undertake a pilot study to identify initial bench marks and best practices in collecting information that would be used for a future, comprehensive look at the state of training. The pilot activity could be limited in scope to a smaller training segment, such as IT-related skills for enforcement inspectors, to be able to hone the techniques and methodologies of benchmarking.	Upon management's direction, NETI will propose a pilot study (in-house or contracted) in FY 2006.
5. NETI will strengthen its role as a national "clearinghouse" of training information, providing a central location of enforcement and compliance assurance training course schedules and sources for training, with the cooperation of OECA and Regional offices in providing NETI with course information.	Upon management's direction, NETI will immediately begin work on a process for collecting course information from OECA and Regional offices for a central location of an enforcement training schedule.

6.	Enforcement managers shall create a Training Planning Council, with representatives of the enforcement program offices and disciplines, under NETI's leadership, to prepare a two-year strategic plan for training. The council should convene on a schedule that coincides with the annual OECA planning process. The plan should be provided to national enforcement program managers for their review and approval. The plan should: --address training needs aligned with enforcement and compliance assurance national strategies, and consider training needs assessments and workforce deployment information. --determine national training priorities, project resource requirements and offer creative approaches to cover both financial and human resource needs, and assign lead roles for development and delivery of priority training projects.	Upon management's direction, NETI will begin to form Council, so that it may hold initial meetings before the end of FY2005.
7.	NETI will continue to fulfill its existing roles to aid others on training development, deliver classroom and distance training, provide training delivery support, collect and maintain a database of course information.	Ongoing
Part IV: Delivery		
8.	NETI will continue delivering the preferred, classroom-based training, using cost-effective strategies.	NETI will formalize the processes used for cost-effective classroom courses, and will make the information available to others via communication vehicles such as NETI Online, the Enforcement Training Network and newsletters.
9.	NETI will provide leadership in the enforcement and compliance assurance program in using distance learning technology by keeping abreast of Agency solutions such as IP Multicasting, Lotus LearningSpace Virtual Classroom, and Macromedia Breeze Live meeting software.	NETI will formalize distance learning technology information, and will make the information available to others via communication vehicles such as NETI Online, the Enforcement Training Network and newsletters.

10.	NETI will explore cost-effective technologies to produce distance courses, specifically reviewing existing CD/ROM courses for conversion to the web, with interactive capabilities that engage the trainees.	Within 90 days, NETI will develop a plan and budget for converting high-demand courses to the web.
Part V: Evaluation		
11.	NETI will convene a workgroup or committee comprised of representatives from NETI, OECA, and Regional offices that will develop and recommend performance measures for the enforcement training program. The group shall review current data collected, including both output (such as current "bean-counting" numbers) and outcome (such as course evaluations) information. The group shall also develop and recommend any new tools needed for further evaluation and how those tools would be implemented.	Upon management's direction, NETI will begin to form a workgroup or committee within 30 days of approval.
Part VI: Strengths and Barriers		
12.	NETI will endeavor to gain management support for priority training projects and explore cost sharing opportunities and partnering with other organizations.	Ongoing
13.	NETI will seek to build staff expertise through various methods, including rotational and detail assignments, educational classes, and memberships in professional training organizations for the NETI staff, and details and rotations from outside of NETI to supplement NETI staff expertise.	NETI will identify opportunities and work with OC managers, as the budget allows.
14.	Other recommendations in this task force report will be implemented to clarify NETI's role and strengthen its organizational standing.	Ongoing

NETI Transition Task Force

To prepare for the transfer of the National Enforcement Training Institute (NETI) to OECA's Office of Compliance (OC), a NETI Transition Task Force is being created to examine various issues associated with training for EPA's national enforcement and compliance assurance program.

To begin the work of the Task Force, this paper identifies the members of the Task Force, describes the issues the Task Force will be asked to address, and provides some ground rules for the operation of the Task Force.

Members of the Task Force

The Task Force will be chaired by Linda Flick, Deputy Director of NETI. Other NETI personnel asked to serve on the Task Force are: Don Gipe, Winston Haythe, Pat Straw, Sarah Hart, Arthene Pugh, Jibri Mayo, and Zena Aldridge. OC's Chief of Staff, Robbi Farrell, will also serve as a member.

Issues to Address

The Task Force should develop findings and/or recommendations about the following issues:

1. Identify the NETI's key accomplishments over the last 5-10 years and the factors that helped produce those accomplishments.

   This does not need to be an enumeration or inventorying of every course or activity NETI has carried out during this period. The Task Force should think broadly about a set of achievements NETI has contributed to the national program, describe those achievements, and identify factors that helped make them happen.

2. Describe how NETI currently measures and reviews its performance and identify alternative ways (if any) that performance might be evaluated.

   The Task Force should discuss the performance indicators NETI has implemented, how they are used to review and improve performance, and what steps might be taken to develop other indicators and increase their use as a management tool.

3. Describe the state of training in the national enforcement and compliance assurance program, NETI's role in it, and opportunities for enhancing NETI's role.

   The Task Force is being asked to comment on the training currently conducted – by NETI and by others – under the umbrella of the national enforcement and compliance assurance program, paying particular attention to NETI's current and future role.

4. Examine the current delivery modes for enforcement and compliance assurance training and review their cost-effectiveness.

   The Task Force should provide its views on whether various forms of delivery (e.g., classroom, on-line, etc.) are cost-effective, and which might be most cost-effective in the future given likely resource levels and emerging needs.

5. Identify the emerging training needs of the national enforcement and compliance assurance program over the next 3-5 years.

   Based on its own views of the future direction of the national program, and through consultation with appropriate parties, the Task Force should describe the training needs and explain why they are important to the national program.

6. Identify the organizational strengths or assets that will help in meeting the emerging training needs, as well as the most significant barriers or challenges that will make it difficult to meet these needs.

   The Task Force should also offer its views of how the strengths can be used and the barriers overcome to effectively meet the emerging training needs.

   It should be noted that some of the six issues above may be addressed only by findings, while other issues will likely be best addressed through findings and recommendations.

Ground Rules

1. As the Task Force works to address the issues presented above, it should seek input from all NETI employees, and reach out to customers and stakeholders as needed.

2. The Chair and the Members can organize the work of the Task Force as they see fit, determining the frequency of meetings, the division of work, whether teams of Task Force members and non-members should be formed to address specific issues, and whether other issues beyond those listed above need to be addressed.

3. A kick-off meeting with the Task Force and the Directors of OC and NETI will be held on XXX.

4. The Task Force will be expected to produce a final report with findings and recommendations by January 28. The report will be submitted to the Director of OC and will likely be the subject of a discussion at the first OECA Senior Enforcement Managers Meeting held in CY 2005.

5. During the operation of the Task Force, a weekly status meeting will be held to allow the Chair to update the Directors of OC and NETI about the work of the Task Force. These meetings can be attended by other members of the Task Force as determined by the

Chair. The meetings will provide an opportunity to ensure that the Task force is making progress, focusing on the right issues, consulting with staff and stakeholders as appropriate, and overcoming any obstacles to completing the report.

Stakeholder Information

OECA

Cheryl	Wasserman
Davis	Jones
Greg	Snyder
Iliana	Tamacas
Jonathan	Binder
Kenneth	Gigliello
Mark	Siegler
Mike	Walker
Mustafa	Ali
Patricia	Kennedy
Virginia	Lathrop
Phyllis	Flaherty
Peter	Bahor

NETI Staff

Nancy	McCeney
Ray	Brown
Daniel	Couturier
Alice	Mims

Regions

Lucy	Casella
Stephen	Perkins
Charles	Zafonte
Garth	Connor
David	Abbott
Bonnie	Romo
Joel	Dougherty
Monica	Espinosa
Kris	Goschen
Liz	Rogers

Other AA

Renelle	Rae
Lourdes	Morales

States

Mary	Boyer	California
Tim	Kluge	Illinois
Rose Ann	Wishner	WSP
James	Triner	MEEA

In its deliberations thus far, the Transition Task Force members have discussed the need for a single source of information about enforcement and compliance assurance training to facilitate planning, share resources and expertise, and avoid duplication of effort. How would it be beneficial to you and your staff if NETI were to fill this role? Can you think of any disadvantages to you if NETI were to fill this role? Please explain.

States

(1) Any centralized source of training information would be useful.

(2) I think that we should have a single source of information about enforcement and compliance assurance training. As you are probably aware, APTI, EOG, keeps the consolidated calendar of training offering for all air related courses. ARB gives EOG information on all the classes we hold nationwide, except for CA classes. Here, in California at the Cal/EPA agency we also have a consolidated calendar of enforcement events that are offered through out California by all the Boards and Departments under Cal/EPA. I also keep a separate list of other Enforcement Training offerings; this includes those that are offered by Western States Projects and California District Attorney's Office. I think that we could be beneficial to you in that we could be a part of your consolidated Enforcement network. I think that if you can develop a consolidated calendar we would then send you our information just like we do for EOG.

(3) Generically it would be an excellent idea. There is so much information available across the national board about enforcement and compliance assurance training and many entities are unaware it even exists. Getting the entire USEPA training universe (federal, state, local and tribal) on the same page would be definitely a productive step to increase efficiency and avoid duplication. Since NETI is already structured to outreach on a national level, it would be a logical choice to have them try and address this need.

<any disadvantages> When speaking on behalf of the four Regional Associations (REEA), definitely not. Our relationship with NETI is already established and we are familiar with its dynamics as they are with ours. We would anticipate continuing an excellent working relationship with NETI if they were tasked to take on the aforementioned role.

Region

(1) It would save the region time and plus NETI could coordinate w/ all the different media.
    No disadvantages

(2) It would be advantageous for the regions to have NETI be the single source of information for enforcement and compliance training. I can't think of any disadvantages, other than the amount of coordination with the regional offices this would encompass.

(3) It would be a good thing if NETI were the one stop shop for enforcement and compliance assistance training. They must have adequate resources to take on this role.

OECA

(1) NETI being a one-stop shop for inspection and enforcement training: This is a great idea, but if NETI has been striving toward that goal, I don't see it. I am not aware that NETI is the location for all compliance assurance courses, so better coordination and linkages to other EPA offices which sponsor training is needed. When looking for media-specific courses, I have exclusively looked to the media offices, such as OW, not NETI which I perceive as just trainers of inspectors and enforcement case managers. If NETI has been serving this function, it hasn't been clear to me and when I search the EPA web site for XYZ Training, I don't often hit NETI sites.

Inspectors in my office say the only way they find relevant training is by lots and lots of networking within OECA and with the Regions. They do not think of NETI as a first source of inspector courses.

Annual refresher OSHA training is also essential. I see NO OSHA courses at all on your web site. If NETI does not offer then, please put in a link to other course providers.

This may be outside of NETI's role, but one colleague of mine would like NETI to offer course in the federal budget process and management courses.

For attorneys, can NETI link readers to DOJ's environmental training courses? DOJ has a large office in So. Carolina devoted just to training DOJ attorneys in all sorts of areas, including litigation and environmental areas.

(2) I always thought that this was one of NETI's primarily roles within OECA. It would be beneficial, so that NETI could report back on courses we offer, and ensure that there are no other available courses so we didn't have to waste time looking elsewhere for training. The only disadvantage is reporting individual, independent training efforts to NETI when they are not directly involved with the development or presentation of the course.

(3) I believe that NETI should perform this function in general. In particular, we need to accommodate some differences in the way international training and capacity building is requested and requests met by EPA and in particular OECA in cooperation with the Regions and other program offices. Some sort of separate but parallel tracking and reporting system could be developed. This may be important for reporting to Congress etc since we usually do not provide funding for these activities and it is important that we be able to distinguish these activities.

(4) Maintaining a compendium of all training (Federal, State, Other) for the Air Enforcement Program would be very useful if the parties providing the information (input) can do so in an automated, brief format, readily available online. I don't think that NETI should be the sole judge of whether duplication is occurring or that similar training is not beneficial to a program. Each program/division should have its say, maintain its priority training list, and provide NETI with updated information. Program expertise should not be overridden by a training generalist's ideas. Besides how will NETI be funded? If the funds come directly from existing program operational funds, NETI will probably not succeed as the cost will be too great. However, putting aside "X" dollars per employee (E.G. $500) in a NETI training fund that programs must draw from is one idea. We should guard against too much paperwork, very long development schedules, too many meetings, and approaches that are not the best from a program perspective. Priorities for training development need to mesh with highest individual program needs.

I would also suggest that NETI serve as a training design consultant. In this capacity, NETI could provide information on how to effectively develop training. For example, NETI could provide training providers with information and substantive support on creating an effective training agenda, developing pre/post training measures, course size and course content. NETI could also help ensure that our training – regardless of subject matter — has the same template or "look and feel."

It is particularly important that NETI develop and apply its skills to measuring the outcomes associated with training. While it is important to track the outputs – the number of people attending a particular class and their affiliation – it is much more important to track how attending the training leads to changes in behavior or changes in understanding that directly or indirectly improve public health and the environment.

No disadvantages.

(5) OECA and the regions manage over 41 separate regulatory programs in 10 regions and HQ. It is unrealistic to believe that any one organization could provide a single source of information about enforcement and compliance assurance training. In addition, there are courses developed both by the Program Offices (OW, OAR, OPPTS, OSWER) and the Regions to meet a specific need (e.g., new regulation) that currently are not captured in the NETI system. While National planning would seem more efficient, it is unclear how this could be implemented without stifling the Regional/HQ efforts to provide training, especially as decisions to train are directly impacted by funding which may change in the year due to management decisions. NETI could provide a valuable service by better coordinating with the Program Offices to determine what training they deliver to the regions and maintaining a repository of up-to-date training materials.

It is not clear what is meant by a "single source of information about ... training". The National Compliance Monitoring Policy Branch, CAMPD, currently leads the effort to implement the revised EPA Order 3500.1 and the federal inspector credentials policies

(Guidance for states/tribes, Federal employees, etc). In that role, they have developed training requirements for inspectors carrying EPA credentials. Additional policies on credentials and training requirements are expected this year. Given their policy role on inspector training, it would seem misleading to designate NETI as the single source of information on compliance monitoring training.

NETI has primarily played the role of providing a catalogue of upcoming training courses, tracking delivery of courses including the number of persons trained based on reports from each OECA offices, as a repository of training materials to some extent, and development and delivery of some generic courses such as the Basic Inspector Training and the Advanced Inspector Training. That role has been useful. Expanding NETI's role as a repository of training materials that are up to date would be useful.

(6) We would like to hear more about this idea before we comment. How is this idea different from what NETI is currently doing (serving as a source of information about training)? Would OECA offices still maintain separate training staffs to develop training? Would NETI expect an influx of resources from OECA offices? These questions and others would need to be answered before we can comment.

(7) A single, comprehensive source of enforcement/compliance information would be useful. Other offices, however, should play a role in information dissemination, course development, and training. Certain offices have ongoing institutional relationships with people and entities that would benefit from learning about course offerings from offices in addition to NETI.

(8) I don't have any strong feelings on this issue. There should be one source of information for the EPA and probably also for the States on environmental enforcement and compliance training. And if there is one sources, NETI should be that source. I think NETI has established itself as a major player. Now it is just a question of enhancing that role and making sure all the enforcement professionals at Federal, State and local level are aware of what NETI can do for them. The main benefit for me would be a better way to get the word about the training I offer.

I can think of no disadvantages for NETI to be in this role.

NETI Staff	

(1) NETI as a single source of information. This is a BIG need. It was tried <previously> with the Blue Form input about five years ago, but it didn't work. I don't know if anyone analyzed why it didn't work, but I would have to guess that it was not supported by upper management, and ignored by the Offices and Divisions, because they preferred to do their own training and distribute their money to contractors.

Unless Top Management "directs" the other Divisions to deal with NETI, it will not happen, because the Offices prefer to spend their money on their own projects and do not want to be told how they can accomplish this task

(2) It would be beneficial to have a "one shop training center" resulting in a more consistent training program.

If NETI were to fill this role and did not have sufficient resources, this would be a grave disadvantage.

Other AA	

(1) From the EPA's Air Pollution Training Institute (APTI) perspective, a single source for this training will be beneficial for planning, sharing of resources and expertise. The lack of centralized planning may result in duplication of efforts. There are many needs at the State and local level for compliance and enforcement training that NETI should take the lead and/or share the lead with OAQPS for funding, development, maintenance and delivery of training.

(2) A central source of information would be useful especially to EPA. Some EPA offices such as OAR, Office of Radiation and Indoor Air (ORIA) have enforcement programs that are under statutory authorities that are not part of the traditional EPA statutes such as CAA, CWA, etc. The enforcement process has the same component and there is no reason to reinvent the wheel. Our emergency response and homeland security personnel could also benefit from NETI because of the need to understand the importance of preserving evidence.

In terms of solutions, I've been working on an EPA-wide project on long-term agency planning and we use a new RTP information sharing system called Quick Place for internal EPA information sharing.

One element of NETI's role in OECA is to track and report all enforcement and compliance training, including training developed and delivered without NETI's direct assistance. Have you or your staff identified or experienced advantages to reporting your training to NETI? Any disadvantages? Please explain.

NETI encourages the use of its website "NETI Online" for enforcement and compliance trainings in the regions and headquarters. "NETI Online" offers automated administrative services to instructors and students, including reporting training activities to headquarters. Have you or your staff identified or experienced benefits to using "NETI Online" for any courses you've developed and delivered? Any barriers or challenges? Please explain.

Aside from reporting training activities, what other criteria would you use to evaluate the national enforcement and compliance training program? How could that information be collected?

State

(1) We have not used NETI online for this purpose.

I think the provider of the training should be taken into consideration. It would be good to have a few testimonials by the students to see how it was received. I know that this would be hard to collect as well as hard to evaluate.

(2) There have been no disadvantages to reporting our training to NETI.

The success of this endeavor will be determined by how well USEPA can facilitate compliance and cooperation from those governmental agencies whose training information USEPA identifies as necessary to track. In order to accomplish this difficult task, NETI will need the support of OECA to stress to those agencies that working with NETI to track training is not just encouraged, but expected.

The instructors that have taught for REEA may have used "NETI Online" for assistance in developing curriculum. We have not experienced any discussion from faculty expressing their use of it. The marketing of this training tool to date has not yet been developed by the REEA.

REEA truly cannot provide a response that would have any impact on this question.

Create a date base of those trained by the various entities.

Continuity, Accuracy and Timeliness of the training. In other words, making sure training programs are constantly being updated and upgraded. The student evaluation process must serve a real purpose.

Conduct follow-up evaluations, maybe a year out, to see if the students who are now in the field were actually exposed to opportunities to put into play what they were taught. This could also be extended to evaluate what curriculum they wish they had been taught to prepare them better for the real world.

How could that information be collected?

The training entities would submit rosters of attendees in a universal format designated by NETI.

B. Giving the student evaluations a sincere look and then actually putting into place suggestions of merit. In addition, the creation of a National Curriculum Board could be tasked with reviewing training agendas and materials, and then making formal recommendations,

C. Idealistically, but probably not realistically, information could be gathered by conducting one-on-one telephone surveys. Not near as difficult would be the solicitation of comments by utilizing the training database. It would be the responsibility of the training entity to gather the information and forward it to NETI.

Region

(1) I am not aware that our region has been reporting to NETI all enforcement and compliance training, especially training developed and delivered without NETI's direct assistance to NETI. We do manually report capacity building efforts to OECA as part of the mid-year and end-of-the year reporting cycle. Compliance assistance training is entered into ICIS and reported quarterly.

- # of individuals (EPA or State personnel) reporting better understanding of the regulation or enforcement issue. The information could be collected at the end of the training or via email afterwards.

(2) I have not had anyone raise with me concerns or disadvantages to reporting training to NETI or using NETI Online. Ken Rota, or others closer to users, could provide a more informed perspective on this question.

An important way to evaluate the national enforcement and compliance training program would be to survey staff and their managers to find out if their training needs are being met through the availability of NETI courses. It is important for NETI to know what the unmet needs are and to develop a plan to address them.

(3) No, other than it being mentioned in a newsletter.

Yes, NETI could help with keeping the national inspector database current by listing inspector training. This would also help inspector managers assure that there inspectors meet the training requirements of 3500.1 <disadvantage> No

Yes, benefits include efficient source for tracking who's signed up and printing out rosters. The only barrier or challenge is again reminding our Region 7 staff that even though they sign up on a different system to get credit in their HR file, they also have to sign up at NETI Online. So there are still inconsistencies w/ who will show up for the training.

I would suggest sending out at least 1 or 2 follow up emails to everyone who attended the NETI training and then asking them a few easy questions like if they are using information learned from the training in their work life? It could be collected automatically through NETI Online by having the survey/questions emailed right after the person attends the training.

I would develop a certification program for the various training courses that would require testing of the students. This would allow for a clear measurement of knowledge and a means of assuring that inspector capabilities.

OECA

(1) Yes, NETI has been a major benefit in deliver of a number of my courses and they have help wonderfully to ensure my courses were working properly. I felt without their help my course would have not been as well put together. And Jibri Mayo continues to work on some project for me to get training up and running. Without we would not have been able to have accomplished this work.

<what other criteria> Surveys and websites usage

(2) If I stay current with my reporting to NETI (Not always the case), it gives me the ability to see what was actually done and numbers of people trained without reviewing my individual files. The disadvantage is the reporting mechanism doesn't always work well, and is one more thing to do in an already busy schedule when preparing for a course.

One major software problem is the inability to list locations outside the U.S., where all my courses are held. I have also reported courses into the system that were either lost or not referred to in developing EOY reports. It is not useful to me for printing certificates, etc., since I usually don't have the attendance list before leaving for the course. Finally, I am an infrequent user, and consistently forget my access information.

It would be useful if NETI could evaluate courses themselves to see how well they are conducted and whether actual job performance is improved. (Indicators of behavior change.) I don't know how to collect the information.

(3) It is important for EPA in general and our offices in particular to account for our activities and use of the federal dollar, so I support the kind of reporting that NETI engages in. This reporting should not be an end of year, end of quarter activity but should be driven by the delivery of training and the excellent NETI system.   Training should not be closed out until a) a class list as attended is submitted (so no-shows neither get credit nor do they get off scott free), b) the final class statistics are recorded, and c) the evaluations are reported in highly summary form.   Should include stats about who was trained, including EPA HQ, EPA Region, Other Federal agency, state, local, tribal, international etc.

NETI online is wonderful and easy to use and has the added benefit of enabling NETI staff to provide tent cards, name tags and certificates. There were glitches however, including: a) need to provide for registration of facilitators or trainers so that there are name tags and tent cards and certificates for them as well, b) double entries which could not be eliminated from the list, c) difficulty of removing a name if the individual pulled out of the training.

a) whether each of the key target groups identified in the legislation is being served and to what extent, i.e. what is the relative resource investment in Inspectors, investigators, prosecutors, program personnel, etc...federal versus, state, local, tribal; domestic versus international; b) what skill and experience level is targeted by the training, basic versus advanced, skill versus knowledge, c) what techniques are being used and what are the trends? i.e., classroom, distance learning, field experience, self study to provide an indication of how NETI is making use of a variety of approaches to meet its mission, d) extent to which training requests are met by current training program…quantitatively and qualitatively…if requests are in for training 2000 and NETI trained 200, that says something.   If requests are in for training in Drinking Water programs by local governments and the vast majority of courses are in other program areas and delivered to federal and state levels, that would be something worthy of follow up.

(4) No advantages noted. Disadvantages have been the time to do all of the reporting and stay current with training procedures and paperwork. Effort that doesn't help accomplish program goals.

No comment. Not used. Basically too busy.

Get feedback from the immediate supervisors of the trained person to determine if any appreciable improvement or benefit could be related to the training. Are cases better handled? Are more violations uncovered? Coordinate with States and State associations with RO help.

(5) …unified tracking and reporting is essential to measuring the Tribal Priority's success or failure in increasing the number of tribal environmental professionals trained through EPA-sponsored courses. The Tribal Priority Implementation Team relied on NETI's information to establish the training measurement's baseline data. In the past, I've relied on NETI to track information associated

with the number of tribal environmental professionals taking the Basic Inspector Training Class. In both cases I've had positive experiences obtaining the information. NETI's assumption of a "single source" role and "clearinghouse" large would greatly enhance the Tribal Priority's ability to measure tribal participation in EPA-sponsored trainings.

It may be difficult for people interested in NETI training to finding information about NETI and NETI Online. To find NETI from the OECA webpage is not necessarily intuitive. More specifically, to get information about NETI training from the main OECA Internet site, one must first click on "training" on the left side (http://www.epa.gov/compliance/training/index.html and then click on Enforcement and Compliance Monitoring. Typing "NETI" in the search box at www.epa.gov does lead to NETI information. The first link, however, is a PDF document for someone interested in applying for training. The second link indicates that a course schedule is available and requires and additional "click" to go to NETI Online.

NETI may want to consider making it easier for users to identify courses by media topic or by inspector topic. As currently organized, NETI Online allows users to identify courses only by "Course," "Date," and "Region."

Note that as of January 31, 2005, no information is available on courses in EPA Regions 1, 2, and 10. It may also be helpful to not use abbreviations (NEPA, NPDES, OECA, etc) and identify the states that each regional office serves.

While deciding the scope of NETI's mission, NETI should consider adding a "links" tab that would allow users to go to other EPA training websites.

NETI should develop expertise in measuring the pre- and post-training knowledge of training participants. As I understand the current situation, NETI does not routinely measure the transfer of knowledge at training classes, including changes in behavior. This type of measurement is essential to truly understanding a particular training course's success. Rolling up this type of information could transfer NETI's measurement from one purely based on "outputs" to one based on both "outputs" and "outcomes."

(6) There are obvious advantages in working with NETI to register students and have certifications printed to track the training. It does provide a good repository of upcoming and planned courses, although including information of training to be delivered by the Program Offices and the regions should be a long-term goal. One disadvantage is the fact that NETI online is available to the general public, namely access to training for people who are not the target audience. All of the NETI courses should target the regulatory agencies (states, tribes, county, local organizations) as the audience. These courses should not be open to those outside of EPA or states/tribes/local governments unless the course is specifically meant to be open to them such as EPA contractors or EPA grantees.

NETI has been helpful by posting CD ROM training on web pages so that state/tribal inspectors did not need to physically obtain the CD ROM. It would be helpful if NETI did more with existing inspector training courses/ material, especially the health and safety CD ROM, the BIT, and the Advanced Inspector Training to make them available over the web rather than by CD ROM.

A recent example of an unanticipated problem encountered when our office posted training on NETI was when we posted the National EPA Inspector Workshop announcement and training courses being offered this past December. This workshop was limited to EPA and invited state personnel (one for each state association that are regulatory partners). Someone from a foreign country registered - we did not realize this until late and then had to notify him that this was not a workshop opened to outsiders. He insisted he was going to attend. This resulted in a security issue as well as an uncomfortable situation. Given that registering for a course could result in anyone's name being on an attendance list and being admitted into a Federal building, this would seem a potential security risk. In addition, most of EPA's courses that are aimed at our regulatory partners and EPA personnel should not be open to those outside of EPA or states/tribes unless the course is specifically meant to be open to them. It may be useful for NETI to remind persons sponsoring courses and listing them on NETI that they need to say who the course is for as the website is open to the public and that it is their responsibility to screen attendees. Another alternative may be to have a way for the computer to alert sponsors to those who register that don't fit the profile and to reject the registration unless the sponsor specifically approves the person.

The NCMPB is also working on an Inspector Directory to track what training inspectors have had that meet the requirements of the EPA Order 3500.1. Ideally, we would have one tracking system for inspector training requirements - previous discussions indicate that NETI's tracking is only done for those courses listed on NETI on-line and doesn't capture all training. Discussions with NCMPB on tracking training and ensuring inspectors have met training requirements and NETI's tracking system would be useful.

One criteria could be availability of required inspector training (per 3500.1).

Another would be measuring environmental results achieved by conducting a short survey of students 3-6 months after taking the training to determine if it has helped them do their jobs more effectively (e.g., more quality inspections, more violations noted, more enforcement, etc.). NETI could also explore establishing a more rigorous training evaluation process that could include a pre- and post- test to determine whether the trainee actually learned the material

It would be useful to test whether the trainee actually understands the material - while pass/fail tests may not be the best approach, training where the trainee doesn't pass until he has accurately completed test questions would provide a better measure than simply showing up or reading a CD ROM.

NETI has been very helpful in the delivery of a number of the NCPMB/Water team courses. NETI ensured the courses were working properly; without NETI's help the courses would have not been put together as well. NETI has been useful to advertise courses and for people to contact those in charge of setting up the course.   It would be helpful to have NETI track the calls of those who have questions on specific courses, and determine the demand for each course.

(7) OSRE currently reports all training information from completed course deliveries through NETI. Over the years this has worked out well to have one central office publish this information. The advantage to NETI reporting our training is that OECA management is aware of training that has occurred and the number of people reached.

OSRE currently uses NETI Online to register attendees for the New Attorney Training. This is a very efficient way to register the attendees, provide a copy of the draft agenda and hotel information which save time in not having to respond to separate requests. We have experienced some challenges in getting our information put onto NETI Online in a timely fashion, but we have rectified that situation.

Evaluation of training, as you are well aware, is expensive and time-consuming. Anything other than what is being done now would probably take more resources than are available. I believe NETI did an overarching evaluation several years back. Perhaps there are "lessons learned" from that exercise that would help?

(8) I think it is very important for there to be one consistent point of contact on these issues, and NETI is by far in the best position to be that point of contact. I routinely report my training to NETI, and I do not find it burdensome. In the meantime, the reporting allows us to better determine what training is needed.

I think it is a very solid system for course registrations. There are a few minor user friendliness issues from an instructor's point of view that could be improved upon, but I really appreciate the utility of the system in delivering my courses. Here are a few ideas:

a.   It seems like I have to repeat some steps to get an idea who has registered for my courses. I think it could be simplified
b.   Even better, but more complicated from your end, would be a system that would automatically report to the instructor once each week on the status of the registrations. It could be done by e-mail.
c.   At the end of each year, the system could be used to generate the yearly numbers.

If you could somehow automate course evaluations in the system, you could have that information available to the instructor on an easy routine basis by e-mail.

Other AA

(1) We don't report our training to NETI. If you are only tracking for "bin counting" then it is not very useful. If you are tracking to determine if you are meeting identified needs and to help identify new needs, then it is useful.

Collect information that helps to assess the effectiveness of the training and if additional training is needed. Second and higher level evaluations are recommended.

(2) Reporting the existence of new training courses relevant to NETI would be useful even when the course might not address a typical NETI training area. For example, ORIA has a basic course on air plume modeling that would be useful for non scientist to understand how pollutants move through the air. There is a great opportunity for transference of knowledge and concepts.

There is also value in sharing new training designs and delivery options such as web-based training that may be downloaded to State and local classrooms.

NETI's delivery system is outstanding. The on-line web site is a useful tool to quickly answer the question "What training is available? Its on-line data base connects to other EPA institutes such OAR APTI course. It is easy to register for a course on line or obtain course handbooks.

In addition to reporting training activities, breakdown categories of and delivery methods and learning methods could be reported. For example
--the reach of NETI. The number of people that participate in a distributive learning program from various geographic places (courses by mail, classroom, CD-ROM.) Some delivery methods lower participant travel costs by having NETI faculty travel to the location.

--The diversity of NETI learning methods. The number of intense skill-building courses such as courtroom advocacy or negotiation skill development. These courses cost more but are more likely to embed the skill for the long-term. The number of CD-ROD courses that can be used anytime and anyplace. CD-ROMs present a different learning method where the student can use the product first to learn the basics and then go back and get refreshers when they need to or annually such as inspector 40 hour safety training. Interactive CD-ROMs which requires the participant to learn by doing and trial and error are more likely to enhance memory and learning then CD-ROMs than page turner CD that use PowerPoint slides and pictures and simple tests.
The cost to NETI of designing and delivering this course will vary. Measuring the intensity and investment in learning will help demonstrate the need for different course costs. Courses with more interactive learning and more faculty to coach students may cost more but may have more lasting value.

NETI Staff

(1) NETI on line This one is my pet peeve – because it would be SO USEFUL for all of the Regions to use when we schedule courses. Some Regions still insist on using their system – The Registrar -- which means that we record the attendees twice (in their system and then in ours). If we could just Get them to understand our system, then they might use it too.

(2) <Other Criteria> Some type of needs assessments resulting in developing an overall effective training program.

Since our resources are limited, we can check with our training counterparts to see if they have actually conducted (recent) assessments. If so, review and compare the results. The information gathered could help with our training needs.

Another approach, we could identify a more defined way to identify knowledge areas needing training and skill areas needing training. Depending on the position, skill matrixes could be developed. Current or potential students could evaluate their own strengths and weakness and then compare their current skill level with needed skill level. This would give a general idea where the gaps in current training exist. It would help with identifying what courses are actually useful and what courses need to be developed.

Follow-up evaluations is another way to evaluate and assess the effectiveness of the training program. For a more effective evaluation process, we should move beyond level 2 to level 3 and 4 evaluations. Level 3 evaluations will determine if the newly acquired skills, knowledge or attitude of the student is being used in their everyday environment.

Eventually level 4 evaluations would measure the success of the training program. Did the training actually improve productivity and how much return on the dollar was received. Based on the priorities of the organization; managers and trainers will have a better idea of where best to spend the limited resources that are available.

(3) Consensus on what should be considered measurable training activities
       a: How do you capture direct field "one to one" mentor-ship which is the best training method that exist but virtually never captured in our national reporting.
b: Use of IDP's to assess training needs and track progress .
c: Enforcing and tracking minimum training standards 3500-1order.

(4) Currently, NETI uses "head counting" and deliveries as primary measures. NETI refines these numbers by breaking out audience profile along the lines of its mission statement - according to level of government (federal, state, local, tribal, international), and media (air, water, etc), and program (civil, criminal, judicial, administrative), and position (inspector, investigator, attorney, case developer).

This has been helpful to ensure that goals for meeting target audiences are met (e.g. increase tribal audience by 20%; or not too heavily Fed).

The method by which productivity is measured merits reconsideration and should be supplemented with other parameters to better reflect use of resources. A view from day-to-day facility management raises some interesting observations:

Consideration 1. The all-in-one number (per delivery) does not distinguish course duration. For example, a one-hour course delivery is "weighted" the same as a week-long course delivery. Both are represented as one delivery.

Consideration 2. Varied use of a facility within a delivery can be significant (at least from the perspective of a facility manager). For example, NETI-West hosted a course which used seven rooms of elaborate set-up and nine instructors for 5 days of intensive role-play. Though a great challenge, it appeared small - counted as 1 delivery with 20 students.

Consideration 3. One 3-day course involved slightly different attendees on each day. Even though the additions and subtractions balanced to report a total of 20 students (each day) for one delivery, the course actually trained 30 different persons. Conversely, a 30-count roster by day three might over-represent.

Consideration 4. Occasionally, the same two-day course is delivered back-to-back within the same week. Current accounting would likely allow for this to be counted as two deliveries, but the reservation system (used for year-end tally) used to book the customer as a 4-day block without reflecting the finer division within.

As a magnified example, consider a year-long comparison of two courses:
Course ONE is Mondays only; 2-hours; 20 students; 50 weeks
Course TWO is five days per week; 8-hour per day; 20 students; 50 weeks

Using the existing per delivery and per head counting method:
Course ONE = 50 deliveries / 20 students
Course TWO = 50 deliveries / 20 students

Using a per student contact-hour counting method:
Course ONE = 2,000 hours
Course TWO = 40,000 hours

There is a variety of ways that these totals could be represented. There is no trick to this math, nor intent to artificially inflate numbers. The number of deliveries and students is critical, representative of an admirable effort, and of course should be maintained. Ultimately, NETI asks: "What are we trying to indicate with the annual report?"

Considering the drastic difference in resources expended by NETI, additional methods of accounting would be useful in reflecting services provided. Also, viewing the NETI picture at more angles would provide data for deeper analysis.

Since some expenditures (and therefore stated continuing resource needs), are driven by replenishing used resources and maintenance of the facilities, NETI might use a per person-day, or other measure. Such factors better reflect the intensity of facility use and investment of staff time. At NETI-West, a large portion of time is spent providing training support such as facility management (reservations, tours, hosting, supplies) and development (design consulting, video editing) – representing another list of core services which might be measured (which may not even yield a delivery, a head count, nor a final product owned by NETI). These intangible services may be harder to quantify, or may be considered overhead and background activity.

A secondary measure representing facility usage (based upon percent of seating capacity, and/or tracking functionality utilized by customers) might be helpful in proposing expansion of services provided, and projecting hardware upgrades, and general wear-and-tear maintenance, replacements, and cleaning.

A related, but separate consideration is "Who are the facility users?". As a member of the deep and wide government community, NETI should consider to what extent their resources should be available for use by non-EPA agencies. If prioritization conflicts occur too frequently, either NETI projects, or customers and the facility, suffer diminished attention.

For example, NETI-HQ has more specialized staff (facility manager, A-V support, PC support, purchasing, contracting, instructors, assistants) than does NETI-West where these responsibilities are spread among the small existing staff who act in multiple roles.

Head counting and deliveries are good starting points to quantify training. Certainly, volume of traffic indicates customer interest and responsiveness. Getting bodies into seats and brains engaged is prerequisite to effectiveness. Ultimately, training effectiveness is foundational to a training organization claiming success. NETI should discuss measures of training effectiveness unto a conclusion - either create a means to do so (albeit simplistic to start) or consciously decline based upon stated impracticalities (which are many – methodology, volume, representativeness, access to users, etc). Personnel constraints within NETI seem to be the de facto basis for not having the capacity to adequately address this critical measure.

Other areas of data collection and analysis could provide NETI a continuous measure of success toward objectives, and provide feedback to reveal any need for adjustments to expectations and strategies.

For example, the future viability and demand for CD-based courses is unknown. What does the reduced number of technical support phone calls indicate? If the volume of distribution has gone down, then it might indicate simple proportional expectations. A log of technical issues has not been maintained, but it is notable that recent user problems seem to center upon the users' computers. There is an increasing number of student progress tracking issues where changes to Windows is suspect (a normal occurrence). Have the CD products been tested for compatibility onto the Windows XP platform? Will NETI continue to produce and distribute the Win95 version to meet demand, or prioritize and fund conversion to an online platform? The latter is recommended.

Other goals for NETI that might allow measurement include:
Number of new courses developed
Reduced product development time
Return on Investment
New customers served, or added to NOL database
Customer satisfaction survey results
Staff satisfaction survey results
Staff positions acquired, retained
Organizational recognition award (another "Hammer")

The Task Force is interested in benchmarking the state of enforcement and compliance training. Nationally, this training is conducted by NETI and others within and outside EPA.
> d.   *To reflect the universe of training, what data and information should be collected?*
> e.   *What method should be used to collect universe of training information to prepare a state of training report?*
> f.   *What role should NETI have in managing the national enforcement and compliance assurance state of training?*

State

(1) EOG just finished a six-month benchmarking study on how effective is the EOG training program. I would recommend that you look at that study. The study not only covers EOG training but also several other government agencies and one private company that also does training.

To study the universe of training would be a very large job. Since you cover all media and both inspectors and prosecutors, you add another layer of study. I think this would be a huge job. I would suggest you review what you, NETI, does as a good starting point. This would involve interviewing your stakeholders to see if they are getting the most out of what you offer. Considering that your budget has decreased each year, I am afraid the chief compliant will be "not enough training to take care of the need".

(2) universe of training - In order to assure consistency in training we should be identifying what courses are being offered to federal, state and local regulatory, investigative and attorneys, enforcement, both civil and criminal. This will identify what is currently available by subject matter (potential target audience) and provider.

method - The easiest method would to devise a form that could be submitted electronically by the presenter of each training course to NETI. It should contain that basic course target audience information to assist in classifying the courses. By using the electronic submission the information it would be possible to develop lists of training by type and provider and apply it to each identified target audience.

role- NETI should be the repository for all of the information and from that be able to identify training courses by type (i.e. regulatory, investigative, legal) and possible providers. This would assist in identifying duplication of training by both location and content and could assist in identifying "training needs" by tracking the type and location of training requests.

Region

(1) a. Who attends training, how well the training helps people, and creative ways to train the trainer in light of training budget cuts.
b. On line survey
c. Lead coordinator and creator or training survey information/data.

I would suggest sending out at least 1 or 2 follow up emails to everyone who attended the NETI training and then asking them a few easy questions like if they are using information learned from the training in their work life? It could be collected automatically through NETI Online by having the survey/questions emailed right after the person attends the training.

(2) *universe of training* - we need data on who has taken what courses. If NETI Online is insufficient, they you may need to consider a survey to collect *universe of training* information.

role - NETI ought to have the main compiling and coordinating role in managing the national enforcement and compliance assurance *state of training*.

(3) I.D. all EPA developed inspector training and it's source.
role - Lead coordinator and creator or training survey information/data.

OECA	(1)What courses are actually being offered, numbers of attendees, number of unmet requests for training, both by course and by students unable to attend, how many people are at what stage in the NETI curriculum. (2) *universe of training* - Examine what is offered by our domestic and international partners, including information from ASWIPCA, ATSWOMO, STAPPA, ALAPPCO, UIC...District Attorneys, NAAG, etc. Toxics ......others police, customs officials, FBI, DOJ, EPA Regions and HQ, Labs etc, State and local and university based training at the graduate level of a professional nature related to inspection and enforcement activities. Given the importance of our cooperation internationally, particularly in the field of environmental crime and enforcement of domestic provisions of law implementing international agreements, I believe it should also count training undertaken by organizations such as INTERPOL and INECE etc., and to assure that this is manageable, I would only include either initially or on a sustained basis, those organizations with a common purpose to OECA/NETI and with whom we partner. For example, if we develop a course for INTERPOL or one being used by INECE, we should could when it is offered even if we are a minority or are not on the training team. As for industry compliance related training, that is a more difficult question. I think training for compliance management is an important programmatic priority, one that should be leveraged with private sector groups. But I question whether that is a purpose of NETI under the law, and whether that sort of counting would be counter-productive and diluting of the focus of NETI.

method - I would work with the Associations as part of our grants (do we still have them?) And the NETI Board and steering committee structure. As a collaborative effort to address and indeed credit/acknowledge training needs and delivery nationally I believe it would be welcome.

role - As we envisioned when my office had developed the EPA Order on Inspector Training, I believe the Regional Offices and Program offices should report training related to environmental compliance and enforcement to NETI.   Definitional issues may arise in regard to related disciplines such as monitoring techniques etc, but if they are for the purpose of training someone to do the job functions listed in the NETI law, it should be covered and included.

(3) *universe of training* - By program (air(and major topic (case development) and level (100, 200, 300 course), collect the number of courses conducted, format, number of trainers, number of students trained, approximate cost (all costs) per student, frequency of delivery, party doing the training, funding source (feds, states, private etc), and special considerations (video, travel funds)
method - Online voluntary survey sponsored by state/federal/university organizations
role - Coordinate, organize, collect, review with task force, and implement with program support

(4) EPA Program Offices and Regions directly and indirectly (through contracts, grants, cooperative agreements, etc.) offer an array of training. NETI should identify the universe by working with the key Program and Regional personnel responsible for these activities. If no such a person exists, NETI should work with the various organizations to establish such a point of contact. NETI should consider measuring how many individuals (and which individuals) respond to the bi-monthly distribution of the National Environmental Enforcement Training Newsletter. NETI could accomplish this by setting up a temporary Internet portal with a unique URL listed in the newsletter; this is similar to Region 1's post-inspection letter website. This measurement would help NETI determine the Newsletter's impact and might lead to altering how training information is distributed.

universe of training - NETI should consider adopting the Internet information "collection" tools currently used by the Compliance Assistance Centers and the National Environmental Compliance Assistance Clearinghouse. NETI could collect information using the "contacts" network. Another possible option is for NETI to work with the Grants Administration Division to determine whether it is possible to collect information on all EPA-sponsored grants & cooperative agreements with training components.

NETI should consider the results of four Google searches conducted on January 31, 2005. These searches used the phrases: (1) "environmental enforcement training;" (2) "environmental compliance training;" (3) "environmental training;" and "EPA training." Links to NETI appeared three time sin the "environmental enforcement training" search. NETI did not appear in either the "environmental compliance training," "environmental training," or "EPA training" searches.

role - NETI should manage the effort. That said, I'm not sure I understand what you specifically mean by *state of training report.*

(5) Bench marking the availability of inspector course required by EPA Order 3500., including media specific training, Health and Safety Training, and the Basic Inspector Training.

Tracking number of persons including their affiliation (EPA, state or tribal inspectors, or case development officers or managers) would be useful.

Developing measures for training that can be used across the board as well as standardized course evaluations .

Maintain a library of training materials as they are completed (CD ROMS, manuals, instructor manuals).
Have a method to determine if the materials are considered current by the OECA program leads. As Regions give courses, they often provide ad hoc updates - including this material to the library would be useful, although it is also important to identify which material has undergone an official review within EPA for accuracy.

The existing list of training which comes out every month or two is very useful. Having all the training listed in one location is a big help.

(6) We think you probably have a handle on the universe of training from the information you collect already.
role - We feel that NETI could report on the universe as well as on trends – numbers of participants going up or down in certain types of training, for example. We don't think that NETI should try to "steer" (i.e., decide what training should be offered) the state of training in any one direction. It should be a reporting office and let the program OECA offices "steer" the courses.

(7) The task force should consider using the OECA Strategic Plan as a possible bench marking tool by reviewing the various subject matters of the courses taught and their relationship to the strategic plan and the overall goals of OECA.
universe of training- Outcomes; Measures of success; Number of students; Hours of training

method - In depth follow-up interviews.
role - NETI has the expertise and experience to ensure that training inside OECA is achieved in an efficient and effective manner. NETI should continue to be the central point for the development and implementation of enforcement training.

(8) For each course, number of deliveries, number of attendees divided by EPA (HQ, Regions) State and local, other Federal Agencies, foreign governments

method - To the greatest extent, NETI data supplemented with course information not in the system.
role - It should have the major role.

Other AA	
	(1) The APTI just completed a training benchmark study on our training program. My recommendation is to hire an experienced company to focus the scope of your benchmark study, and to identify the data needed and its collection methods.

(2) Studying the universe of training would reveal the gaps and redundancies. The success of NETI has been to build the basic courses so that each EPA office does not build a duplicate basic course. It's cheaper for EPA to build one basic introduction to inspections course or an introduction to enforcement negotiations program and to let HQ and Regional offices tailor that course to their needs.

A universe of training benchmark study might reveal. What can only EPA NETI do? What does NETI do best? Where does NETI have the greatest assets such as faculty experts with experience? What are the specialties of other training courses within and outside EPA? Who has the tailored courses or the courses that address basic, mid-level and senior-level employees? What do you do when you've taken all of NETI's courses?

NETI Staff	
	(1) State of Training – is a difficult one and, in my opinion, very hard to pin down. It will probably take many questionnaires and meetings to come to an agreement on this one.

(2) *universe of training* - Other training counterparts and training identified; Audience (Federal/State/Local/Tribal) trained; Delivery methods used

NETI should be the overall single source of information with efficient resources for the national enforcement and compliance assurance state of training.

(3) Training continues to be challenged by ever-changing technology, specialization, inadequate resources, and competing priorities. The need for training is growing across government, and the diversification topics will multiply that growth.

Training is an expertise that must be both responsive to discovered needs unforeseen, and always staying ahead of known needs that could significantly impact its resources and objectives. Homeland Security is just one example of large and entirely new subjects to be folded into the employee skill set. We have seen this historically with Environmental Justice, EMS, Compliance Assistance, AIDS, etc. NETI should consider forming a <u>rapid response and deployment</u> strategy for urgent topics (such as the existing Timely Training Topics). Such a team would be <u>integral to initial formation of any OECA Task Force</u> where an eventual need for more formal,

substantial, and ongoing training is likely. NETI could apply understanding of the topic gained by early participation to assisting Task Force members or delegates who would act as Subject Matter Experts on an awareness and action campaign (communication and training).

Being the Office for compliance and enforcement, NETI must remain focused upon its primary audience of inspectors and attorneys. However, there may be an opportunity to expand the coordination with the Media Program Offices (while avoiding an historic trap of too deeply supporting weak programs). NETI could compliment efforts or content produced there.

For example, years ago, Air rulemaking groups were asked to consider implementer needs and to involve trainers from prior to the regulation proposal. This provided ample lead time for training material design and development, and for timely distribution to the field.

Also, the Air training institute was willing to run NETI's compliance and enforcement training (BEN/ABEL; negotiations, CEMS) to serve our shared audience, and reciprocated to offer OECA their version of cross-over issues (permitting, monitoring, even field enforcement).

Opportunities exist for NETI to partner with other Offices (or even outside Agencies), to share resources and divide capabilities thus allowing all to economize efforts and focus limited resources upon developing excellence. This would also allow each separate mission to develop fewer areas of in-house expertise. Past project successes include:

  IAG with the FDA studio for live delivery of the Basic Negotiation Skills course
  APTI satellite program contributions delivering OECA content
  FLETC interviewing skills course delivered in Colorado
  SHEMD Health and Safety course delivered to local agencies
  OECA Program Update video produced with OCEMR
  RCRA toxicity testing video produced with NEIC and Dept. of Interior
  Large scale inter-agency counter-terrorism exercises developed with FEMA and GSA

These were all very good one-time efforts; few have been repeated. A paradigm shift comes only when collaborators are willing to divest from some of their traditional processes and allow mission critical dependency upon each other. Such interdependency represents the tougher part of collaborating; it is far beyond an objective list of technical capabilities and ad hoc teams.

Classroom training is getting more prohibitive due to the cost of travel. What other delivery methods have you implemented and/or experienced? Which training methods do you prefer and which training delivery options do you think are the most cost-effective, given likely resource levels and emerging needs?

States

(1) Travel costs and staff time spent on travel are concerns of Illinois EPA. We have utilized both on-line and CD-based training materials and find them beneficial.

(2) We are in the process of putting one week of our training on-line. Our experience, thus far, has been of high frustration. It is difficult to create an on-line program that has enough bells and whistle to keep the person interested so that they complete the entire course. Once it is up and running, which we hope will be in July of this year, I will give you our feedback.

We are also in the process of webcasting another one of our courses. We are planning on having a detailed evaluation for this course offering to see if this will be a feasible option for us to pursue in the future.

As you are probably aware, both on-line and webcasting are very expensive to do. We will have to weigh the cost versus the quality as well.

(3) Distance learning training such as CD ROM based training courses, internet-based training courses and self-guided paper-based training courses all have a role in delivering training in a cost-efficient manner and should be employed when appropriate. However, these distance-learning methods can never truly replace the effectiveness of classroom training. For this reason we feel it is equally important to seriously consider and explore alternative methods of delivering classroom training whenever possible. Listed below are a couple alternatives that we have employed successfully and would recommend to NETI. Each of these alternatives provides a more cost efficient method of delivering training, while preserving several important benefits of traditional classroom training such as, the interaction between students and instructors, the interaction and networking between students, the ability of students to participate in class discussions and/or group exercises, etc.

Alternative One: The traditional method of delivering classroom training [transporting the students, instructors and staff to a specific location] is undeniably becoming more and more costly. However, over the past couple of years the regional associations have been able to continue to present a significant number of classroom training events by taking the instructors and staff to the students. Most environmental enforcement personnel are located either in the state capital agency headquarters or within a few district offices. Students attend training in the city where they are employed and, therefore, have no travel costs associated with attending the training.

By taking the course to the students it has allowed us to continue to present effective classroom training to a large number of students at reduced costs.

Alternative Two: A modified version of classroom training is the use of a satellite broadcasted or a videotape training session with live local facilitators. Such training courses involve the presentation of either (1) the live broadcast of a training course to various locations across the nation with local facilitators and a live "on-the-air" question and answer session, or (2) the video tape presentation of a previously broadcasted satellite training course, again with local facilitators. These types of training sessions allow the course to be presented to a large number of students while preserving the classroom setting. The regional associations have experience in the design and presentation of such a live satellite broadcasted training course. The course was presented in conjunction with the University of Tennessee and broadcasted live over the Law Enforcement Training Network to police officers nationwide.

The Western States Project has approached the challenge of delivering training by determining the most economical ways to provide classroom instruction.
- They conduct courses in less expensive locations (e.g., "Introduction to Criminal Environmental Investigation" course, September 2004, in Las Vegas, NV.) Las Vegas offers relatively inexpensive air fare / hotels.
- They sponsor courses in regional area, (e.g., Sacramento, CA) in which a large number of participants work in the area.
- Recruit experienced retired employees to conduct course (e.g., Interviewing Techniques.)
- Provide limited number of scholarships.
- Look for ways to decrease overall cost of training. For example, the Denver area in not necessarily an inexpensive area, however, they have negotiated with Candlewood Suites near NETI West to provide a discounted room rate and a rental car ($10.00 per day) so students can travel to training site.
- Use the NETI West facility which allows students to use classrooms, computer training lab, mock courtroom, and the practical exercise site at Denver Federal Center at no cost.
- Like the NETI course (CST208 - Enforcement Teamwork: Regulations to Resolutions), they have developed a complex Case Development course example which uses a practical exercise concerning a fictitious company. This example is portable and can be packed up for delivery at different locations.
- The State Associations maintain a catalog of instruction which allow organizations to "pick and choose" from the various topics. For example, a presentation has been put together with ½ day of report writing and ½ day of expert witness training.
- The State Associations cosponsor courses with each other and/or other organizations (i.e., NAAG, CDAA, states) to share costs and make limited training dollars go farther.

Regions

(1) Computer Training versus Classroom Training - I've taken both, and I have trouble taking (and especially finishing) a lengthy course on the computer. It's just so hard to maintain your concentration and focus taking a long course via the computer with major

interruptions.   I like the computer training more for short specific courses or for a topic that is simply not available via the classroom and has to be done via the computer.   If I'm given a choice, like the inspector requirement to have 8 hours of Health & Safety Training each year, I prefer the classroom setting to doing it on my computer.

(2) On-line and CD-based training are cost-effective but most people still prefer classroom environment because they enjoy interaction with the teacher/classmates and get more out of it.

(3)Distance learning options that offer some opportunity for interaction are probably best.

(4) (A) Online *training, teleconferencing, CDROMS, local trainers give training*

(B) - local trainers giving the training or train the trainer programs in each Region

Direct classroom training from nationally recognized trainers, if the region has these individual then they could provide the training.

OECA

(1) (a) Web based Training   (B) Web Cast Training.

(2) A minor point on classes on CD-ROMs: your web site says that after ordering, a CD-ROM will be shipped within 20 business days. That is 4 weeks/1 month which seems like a very long time. If I was interested in a course, I'd like faster delivery that 1 month.

(3) You should carefully consider whether the cost of classroom training is high compared to some other activities. How much does the development of an effective cd-rom or internet-based training cost? I recall figures over $100,000 for the inspector cd. That can fund a lot of classroom courses, if instructors go to students.

I have used live video training effectively, and some "ask-the-expert" type of internet based training. The cd-based training I've experienced had serious shortcoming, but was a little more effective than reading a book. The specific problem is with the Basic Inspector CD that requires internet registration - this is not effective for use as a stand-alone tool; registration should be optional.

(4) I prefer personal, face to face training if at all possible with a qualified and good instructor, and interaction with peers. This can be accomplished, however, by mixing up distance learning techniques with in-classroom experiences and discussions on site. Thus, resources which are limited and scarce, such as that offered by an EPA expert in a field can be complemented by on-site instructors who can engage people and save questions that may require the expert's advice for a special session for that purpose.

Interactive CD/internet based training can be an excellent means of delivering fairly straight forward material. OGC does an excellent job of this with the yearly ethics training program. This is one of several ways to reach a large audience with a consistent message. Again, if there is a set timeframe for taking the training and a session afterward in small groups to discuss issue and see if there are unanswered questions for which additional information needs to be provided, it would be more reinforcing.

I am not sure whether self instructional material will work if it is not required and tracked and not accompanied by a setting that introduces peer or other pressure to actually do the work given other demands.

(5) I prefer a variation on classroom training for complex, interactive topics. For specific topics easily retained video conferencing and computer assisted are OK. Most of the enforcement training fits better in a classroom environment. Classroom training where the instructor(s) travel to a central location to train in the States or other parties backyard in their facilities, often with travel support from the states, is not expensive and is the preferred method by most receiving parties. More people can be trained for less money this way and in a way that they can benefit from other students and direct instructor/student contact. This method can be extended to distant classrooms by video connections. Universities are using this method extensively and productively. Retention of computer-assisted training is so low that the real costs per student are in fact very high including retraining. When was the last time you remembered what you learned on a computer for more than two weeks? A second approach is to train the trainers at a central location, provide assistance as they teach, and use this method as a great multiplier. Cooperative agreements among the EPA programs and with states and their associations and a little university help would work again as it has in the past. Also why not have private-public sessions with industry with different cost scales for attendees?

(6) I've used on-line training, cd-rom training, and classroom training. I believe classroom training is the most effective way to effectively convey information about a particular subject matter. NETI should be cognizant of the fact that on-line training my require "newer" computers and requires regular updating. Factoring in the cost of regularly updating of on-line or cd rom training may reduce the apparent cost disparity with classroom training.

(7) **Training with other inspectors** is critical for inspectors - it is important for inspectors to develop contacts with other inspectors in their field so that they can share expertise.

National workshops which bring inspectors or managers together provide valuable opportunities to build learning networks.

Reviewing/reading national guidance and policies – inspectors need to read statutes and regulations before attending training courses in order to be the most effective. To minimize the time needed for classroom training, one approach that could be adopted is

to require attendees to complete computer based training modules or CD ROMS/reading prior to attending the course and then follow the training with scheduled OJT when they return to their office.

Satellite training with uplinks and downlinks – while this form of training is pretty expensive you can reach all regional offices and practically all state offices through downlinks at hotels, state offices, and universities. We used to do quite a bit of this type of training in the late 1980s and it was well received by the students.

Integrated teleconference with simulcast web presentation software. Have thought about doing this, but have not been able to pull it off. Need to pilot approach to see if it would work. Advantage: Live, with real graphics, text. No travel costs –students can take training at their own workstations. Disadvantages: cost of getting students on a telephone call for extended period of time and lack of availability of conference lines for all students.

On the job training with other inspectors is critical for inspectors - it is important for inspectors to learn from senior inspectors to develop knowledge, skills and abilities that are difficult to replicate in the classroom or anywhere else. **Mentoring** can also provide a training opportunity if generic Mentoring training was developed to promote it.

Mentoring also provides a useful approach in connection with assigned reading and OJT.

Web based Training/ Web Cast Training/ CD-ROM training work well.

(8) At this time, OSRE's training courses, Enforcement Process Overview and the Superfund New Attorney Training, are offered in a classroom setting with experienced instructors. As they are both introductory course, the instructors are able to provide first-hand experiences to enhance the training modules, as well as respond to specific questions. We have developed a CD-ROM training and have looked into, although never developed, web-based training. We believe that web-based training could be cost-effective as well as a way to effectively train, if done correctly. This might include having "live" sessions with regional experts to supplement the written material and offer participants a chance to ask questions. This format is probably best used for an advanced training on a specific subject, as opposed to an introductory "survey" course.

(9) The Office of Environmental Justice implemented a Environmental Justice Train-the-Trainer Workshop to do the following:
-) Increase the number of environmental justice trainers in the Regions and Headquarters.
-) To build environmental justice training capacity across the country .
-) To ensure consistency in the information presented in the environmental justice training workshops.

The Office of Environmental Justice in conjunction with NETI are launching an online environmental justice training course in Spring 2005. This course will be used as a primer to better prepare participants for the OEJ 104 workshop.

(10) The only legitimate alternative to in-person classroom training is WebEx so far, and it still is far less of an experience than live in-person training. I have tried the satellite approach, and I do not think it is very effective.

Other AA

(1) The APTI delivers training in a variety of media: Classroom courses, on-line asynchronous (at own pace) and synchronous (batch), VHS/CD/DVD, and satellite. The most cost-effective training methods will the ones that you can train large amounts of people with a one-time investment: on-line asynchronous and synchronous, and satellite. Blended approaches that combine various media are the best way to maximize resources. (We have a satellite network of over 120 downlink sites across the nation at Regional/State/Local/Tribal agencies and various universities that receive our programs.)

(2) As a former director of an institute, I have participated in many pilots on training delivery. My experience is that information technology (IT) works best for facilitating learning when it is appropriately applied. It depends on the learning objectives of the course and the broad diversity of student learning styles and preferences. What methodology will facilitate the learning of this kind of course material? For example, face-to-face negotiation or leadership simulations are still a superb way to facilitate learning. Information Technology can not replace it. But IT can enhance or reinforce what is learned.

There is value in reporting new kinds of delivery methods such as web-based distributive training. Having experimented with all kinds of training delivery methods, web-based training is an emerging option. Please do not interpret electronic training as e-learning. Some of the current e-learning courses are "page-turners". They present power point slides, outlines and pictures as learning. Web-based training needs to be interactive with the student and instructors. The based web-based I've seen still uses the classroom or team rooms as the gathering place in a local office. Classroom gatherings provide the dynamics and energy for learning. The value of interactive web training is that it can access experts and mentors on-line or by phone anywhere in the country. It allows state and local experts to participate and share their knowledge on-line or by phone.

NETI Staff

(1) All Langevin courses are classroom for the simple reason that it is best for the application and presentation of the materials. Langevin is the world's largest train-the-trainer company.

(2) Expanding NET facility use to leverage cooperative training opportunities across Agency lines
a. Expanded video conferencing within the agency and outside interagency cross-cutting opportunities.
b. The Lakewood Practical Exercise site. (Homeland security, other Joint Agency Exercises)

Examples of successful regional reliance on NETI support resources. Usefulness and methods of expanding opportunities to other regions and tribes.

a. Expansion of Region 6 and 4 examples
b. Training times and Training Review Newsletter
c. Web and NOL advertising in addition to posting short courses

Most effective method of delegation and disbursement of training dollars.

Expanded Systems Support of Capacity building development, tracking and reporting

(3) NETI has used a range of delivery modes over the years and has produced a variety of course materials (classroom, satellite, videotape, CD, online, videoconference, field exercise, residential, self-instruction). After gaining experience in a wide array of methods NETI has settled upon a blended approach consisting of mostly classroom, with some CD and online course offerings. Each has allowed NETI to gain experience in the associated tasks (need surveys, capacity inventories, design, revision, templates, programming, graphics, production, communication/marketing, technical parameters, delivery methods, distribution, contracting, facility management, etc, etc).

All approaches tried thus far seem viable and beneficial; however, each is different. NETI could proceed in any number of directions. Though each has been done well when undertaken individually, NETI resources simply could not sustain the skills and equipment for all of these capabilities. NETI should make deeper investments in developing fewer areas of in-house expertise (communication and marketing or facility management; design and delivery or materials development; programming and graphics or network administration) in order to sustain an excellent standard while continuing the balance of necessary services and production through contracting or partnerships.

An example, from the days of highest NETI productivity, is the CD course production. Four staff members with media program experience designed six environmental statute modules with the more technical work (programming and animation) done with the help of onsite contractors (working capital fund?). The six CDs produced (Statutes, CME Water, Superfund, BIT, RCRA, Criminal Hazard) created a major new component to the larger NETI program. NETI should continue with such forward thinking so that older products or services don't become obsolete.

The work of contractors and their services will have a critical role in supporting expanded NETI services. A contract with NCEP has reproduced and distributed NETI materials. Will that be resumed, even as a stop-gap, and if so can they meet new product formats? NETI might consider whether the "mission contract" (if still available) can support the services that it is now found needing. Or will

NETI Online be the increasing focus for formatting and delivery? If so, an <u>affirmation of its continuing and expanded role</u> should be projected, with discussion of functionality and costs.

<u>Developing complementary technical skills by in-house staff</u> will be invaluable. The staff development thus far seems to offer a backbone for productivity, but would likely need intentional, specific enhancement (programming versus contract management for programming, publishing versus GPO printing services, etc). Staff development is available by means of contracted training, or if not funded, self-initiated using internet or library resources.

There has been training developed within OC Divisions and other OECA Offices. NETI should ensure <u>coordination on the design and development</u> of "outside" projects in a way that assists those clients by lending experience, and potentially <u>directing their product toward a format</u> (templates) that easily integrates to one of the NETI development processes, and one of the NETI delivery strategies (online self-service to a national intranet audience). And, when the product fit is not easy (getting contractor formatted training into our online conversion process by hand copying), NETI should consider <u>modifying current processes</u> to accommodate likely similar requests (future trends).

For example, one expressed intent for NETI online has been to develop a series of "Timely Training Topics" in the PowerPoint format. This could be a productive initiative that lets many courses be uploaded in a fairly short timeframe, with much less production when using existing lectures, and begin to address (usually supplemented by more extensive training elsewhere) national need on a series of topics. However, customer demand seems to have driven NETI toward more extensive and interactive full-scale online training (FIFRA, NPDES). This too is a good thing. Though there has been some research into alternatives (DigiScript conferencing), and conversion of existing courses to an online format (no longer Authorware, but html), it appears that development of the original "campus" model and functionality of NETI online (chat rooms, library, counseling) has necessarily been sacrificed.

Also, a number of final products have been delivered to NETI (some even under a NETI contract) in formats unusable within owned software. NETI has also accepted final delivery without the master files which allow future modifications to be done in-house or by another contractor. NETI should ensure that these two problems are <u>covered in all training contracts (boilerplate)</u>.

A <u>cadre of instructors</u> from outside NETI would be vital to any plan for increasing the number of courses (both development and deliveries). NETI continues to depend upon remaining in-house expertise for some of its delivery of technical material or development of new material. Currently, In-house instructors are maximized and recruited adjunct faculty are well used, but the intent needs to be <u>formalized and investments</u> made.

NETI increasingly is asked to <u>customize course content</u> for a particular audience, on a per delivery basis (state-specific blend of basic and advanced, civil and criminal inspection). NETI might consider how a more <u>modular development</u> of course content would allow flexible deliveries, but needs to maintain some consistency for integrity of curriculum.

What do you see as the existing and emerging training needs for personnel in the national enforcement and compliance assurance program over the next 3 to 5 years? Where do you see critical gaps in the training that is currently provided compared to what is needed?

States

(1) Training should correspond to OECA national priority areas, for example wet weather discharges for the wastewater programs. Due to differences between administrative implementation between U.S. EPA and state programs, the training should have a technical rather than administrative emphasis.

(2) I think that we need more training on what enforcement and compliance assurance will be in the future. With so many companies submitting report online, we will need more auditing skills since the inspector will be required to do this. With new technology being developed so rapidly, the new inspector needs to keep current with what is out there.

In addition, within the next 3-5 years, you will see a turnover in the workforce of approximately 25%.   Thus, there will be need to offer the basic and advanced courses on a more frequent bases. We have 5,000 inspectors in California, but we have only one Advanced Inspector Training Course scheduled in CA. Thus we need to work on developing partnerships with other states and local agencies that would involve those states or locals putting on your training material. We need to be more creative on how to get the training to the inspectors.

(3) Due to normal attrition rates through retirement and the traditionally high turnover rates within the first 3-5 years of employment for both state and federal environmental enforcement professionals, there will be a substantial and continual need for basic enforcement training. Existing basic enforcement training courses therefore, will mostly likely continue to be the mainstay of the NETI curriculum.

Regarding emerging needs, we feel the most significant development impacting NETI over the next decade comes from the role the states now play in environmental enforcement. During the 1980s, and to a greater extent the 1990s, the states have become the primary enforcers of environmental statutes and regulations. Since the states now conduct approximately 80-90% of environmental enforcement activities nationwide (Statistics from an ECOS Report) there is now a disproportionate need to provide training to state enforcement professionals. Unless the states begin to reverse this trend by giving up their primacy in the major environmental programs, which is highly unlikely, one would expect this to be a long-term training need.

Other emerging needs are difficult to predict. An example is the role that environmental enforcement professionals now play in Homeland Security. The events of 9/11 that lead to the creation of the Office of Homeland Security and the developments that followed were not foreseeable.

In summary, we feel that the greatest need for training over the next decade will be basic level enforcement training for state environmental enforcement professionals. Perhaps the question isn't so much "what type of training will be needed in the next decade and beyond", but rather "is NETI structured and equipped to adequately deliver the necessary training to those with the greatest need?"

Regions

(1) More multi-media focused, community involvement, cultural sensitivity/EJ; would also like to see all trainings tied in to the Human Capital Strategy from OARM, especially those trainings designated for new employees.

Sometimes there is a need for more program specific training like RCRA inspections or Pesticides but funding isn't there.

(2) EPA New England understands that the compliance assistance content that NETI currently provides is limited to 30 minutes during the Basic Inspector Training, 60 minutes during the Advanced Inspector Training and one course devoted to compliance assistance, CPA 701 (Self Audit and Inspection Guide for Metal Parts Finishing).

EPA New England believes that NETI could and should have a role in providing more training related to compliance assistance and measurement. Specifically, we'd like to see NETI develop and emphasize the following eight (8) types of training:

- Add compliance assistance content to all regulatory courses that NETI delivers - especially air courses,

- Basic compliance assistance training, encompassing all facets including providing on-site compliance assistance,

- Measurement courses to cover: how to develop initial strategy performance measures, set a baseline, collect and mine data, aggregate and dis-aggregate national and regional data, and how to 'tell a story' based on collected data,

- Sector measurement course - how to address the measurement issues outlined above related to sectors that are more loosely-grouped and harder to reach than those in national legacy data systems,

- How to address measurement of geographic initiatives,

- Course of how to manage and measure website information,

- How to use laptops and other electronic equipment such as tablets to collect and analyze data, and

- Basic statistics training or refresher.

(3) Inspection targeting training, analysis of targeting and enforcement effectiveness training, inspection manager training.

The National Program Offices should be responsible for developing the program specific training information, they could work with NETI on developing the information into a quality course.

(4) Technical training related to national/regional priorities would be beneficial (inspector and case development). This would be even more helpful now that we are starting the three year cycle for the national priorities.

Employees need additional training regarding measurement of environmental outcomes resulting from Compliance Assurance activities. It would also be helpful to review those measures that are reported to Congress, etc., so they can understand why we measure the things we do.

(5) On the enforcement side, training in new techniques or new regulations for experienced inspectors would get top billing. On the compliance assistance side, a more general course for assistance providers (instead of an hour during inspector training) might be valuable. Training on measuring the effectiveness and outcomes of strategies - whether enforcement, assistance or mixed tools - would be very valuable across our staff.

OECA	
	(1) Technical training of inspectors. We are losing experienced inspectors and there knowledge with them as they leave the agency. To train the new inspectors we need to develop more and offer more training.

(2) I hear of a continual need for more advanced, sector or industrial specific training. This should align with OECA priority areas and come out shortly after the sector is identified. In addition, training on any new laws/regulations should come out quickly after the issuance.

(3) My focus now is on NEPA and environmental impact assessment training, the need for which is great throughout the agency, with tribes and other agencies, but I think it is best that I not comment except in general terms. My orientation has always been that it is important to begin with the basics and work from there, basics, not meaning something rudimentary, but ensuring that every player has a common understanding of the entire process, policies, institutions, priorities etc that surrounds their job, that they appreciate the parts and how it comes together, and may only then steep themselves in a series of training opportunities and expectations that |

advance the individual so they can be "excellent". I think we often take a very fragmented approach to training that is both expedient and sometimes wasted.

I would like to see routine "exchanges" among experienced staff where they can develop and record for sharing through HQ tips and tricks in response to problems and challenges encountered in the field. These kinds of 'war stories" and exchanges engender a sense of professionalism and camaraderie.

Training opportunities can be built into "initiatives" used to train staff in all aspects of the target group and the associated compliance issues, training to improve inspections, prosecutions etc. In other words, take advantage of an immediate need to both meet it and provide the basics to improve the program's operations in its entirety. Indeed, as resources become even more scarce, I believe an element of "training" needs to be built into other work as part of the transaction cost of doing the work, whether it be the introduction of new rules, new techniques and methods, new law etc.

(4) We are losing our base our institutional knowledge base over the next 5 years, so its back to basic and intermediate training of state and federal inspectors, engineers, and lawyers. We need to reinvigorate the base such as what California is doing with training in other states and what is happening at Rutgers University. Both of these mechanisms were set up many years ago for the air enforcement inspector training program. In addition to building the base, our work has become very complex, so advanced course for those on the leading edge are also needed.

One major concern is to maintain the separation between enforcement and compliance assistance training and inspections. I'm afraid enforcement training and priorities would suffer. The role of the enforcement inspector is a very difficult one even for an experienced person. We shouldn't compromise valid enforcement cases by providing inappropriate assistance at the same time. Possibly we could establish the separation by creating two new categories with supporting training; 1) certified civil investigators for enforcement and 2) compliance assistance inspectors for compliance assurance?

Without a thorough needs survey I couldn't point to specific gaps. In air enforcement, we could use more 200 and 300 courses on individual programs (Stationary and Mobile) and basic training on the fundamentals of enforcement and the Clean Air Act as well as courses that teach us negotiating, researching, homeland security EPA aspects, etc.

(5) One possibility would be an updated version of the CD-ROM course "Introduction to Superfund Enforcement." This training gives a new employee a good overview of the program without incurring training costs. The current CD was last updated more than seven years ago.

We think we have the introductory course needs met through our current offerings, which we plan to continue. It is always a challenge to develop training for new initiatives or topics that arise and have that training be completed in a timely manner. The gaps right now seem to exist in the areas of financial assurance, institutional controls, and real property law as it relates to site remediation.

(6) The critical gap seems to be in finding and retaining qualified instructors. There is definitely a need for increased resources in this area.

(7) The biggest gap by far is in brining administrative enforcement actions. Our attorneys are woefully inadequate here. We need the equivalent of the Boulder Institute for administrative litigation. It should be an intensive one week course along the same lines as Boulder. Maybe we should call it the Pebble Institute.

(8) Training to meet 3500.1 mandatory training requirements and the mandatory training requirements for states/tribes requesting EPA credentials. The BIT should be tailored to states/tribes.

Use of and expertise in new monitoring technologies including continuous emission monitors, remote sensing, computer monitoring systems and field techniques to measure air, water and waste releases

- Biological, chemical, electrical engineering in emerging areas that have potential to cause serious environmental damage: aquaculture; nanotechnology;, exploration, use and distribution of new energy distribution systems (fusion, hydrogen, wind, solar); electronic waste; genetic engineering

- New regulations for air, tanks, water and waste (especially recycling of former hazardous wastes that have been declassified to be non-hazardous)

Critical Gaps:

- Basic Inspector Training delivery

- Appropriate Health and Safety Training for field inspectors

- Advanced Inspector Training– As courses are developed such as the Advanced Inspector Training, it would also be useful if NETI made an effort to have a formal Agency review of the materials to make sure information taught is accurate and peer-reviewed. An example is that a recent advanced course indicated that it was acceptable for the inspector to destroy his field

notes after completion of the inspection report. Our office is reviewing the appropriateness of this practice; our current view is that it is not appropriate to do so - we are checking on this from a legal standpoint (records retention act) and from a policy standpoint before issuing a National policy. That said, a number of inspection manuals issued by EPA indicate that this should not be the practice.

- Appropriate Health and Safety Training for field inspectors.

- OC recently issued Guidance for issuing credentials to states and tribes that provides a uniform policy on what training is needed by state/tribal inspectors. Availability of this training is limited and there is some concern that the CD ROM for the BIT needs updating/revising. In addition, a number of states/tribes have difficulty using CD ROMS that weren't designed for their computers and web based training would be easier. Given some of these inspectors, esp. tribes, may be new to the program, on site training would be preferred. Any efforts NETI can make to improve the BIT and H&S training delivery would be great.

- Right now the need is for MS-4 training (Storm Water), CAFOs, CMOMs and perhaps SPCC new regulatory approach.

- Technical training of inspectors. We are losing experienced inspectors and their knowledge with them as they leave the agency. To train the new inspectors we need to develop more and offer more training.

Other AA

(1) I will recommend that you partner with STAPPA/ALAPCO and /or other organizations to conduct a training needs assessment in your specific area.

(2) An informal group called the EPA Futures Network tracks emerging trends that will impact on EPA. Several futures reports provide information on the challenges and opportunities between now and 2025. Below are only a few examples of how emerging trends will change the work of attorneys and compliance experts.

-- Bar-coding to track official documents that may be used in court such as inspection reports.
-- Bar-coding may be a useful tool for routine parts of inspections.
-- Compliance reports submitted electronically using electronic identification signature rather than a handwritten signature.
-- Environmental monitoring sensor technology (including small nanotechnology devices) that collects compliance data in new ways.
-- Multi-media environmental impacts; geographic issues

-- GIS plotting systems that will show environmental issues in holistic ways. What will happen when the public can sees the whole picture and the systemic interrelationships across pollutant media? EPA's statutes, compliance and enforcement data bases emphasize the parts – clean water, clean air, clean land, etc. Regional offices are already experiencing the impacts.
-- Game theory in promoting learning. The FBI and other offices are developing computer games to assist learning.   The Woodrow Wilson International Center for Scholars has an on-going speaker series in this area.

As part of the benchmarking exercise, NETI might look at tracking these emerging trends. Other government agencies such as DOJ, FAA may already be using some of these technologies. NETI could offer update courses on emerging technology for managers and hiring officials. When the emerging trend is solid and likely to impact EPA within the next 2-3 years, NETI could begin designing the introductory course a year or two in advances.

NETI Staff	

(1) NETI should be training employees on how to use power-point presentations, and communications and speaking skills. Many of the employees in NETI are skilled in these tasks and could teach other EPA employees. EPA employees area aware of the Toastmasters Speaking group, which offers life-long training in communications.

(2) By maintaining a professional network (inside and outside the government) to monitor the pulse and trends around training, and by using those insights to conduct a survey unique to the OECA audience, and thus derive objectives and a flexible strategy for success, NETI could assume a leading role. The NETI Liaison Network of Regional Offices provides (among other benefits) an opportunity for ongoing feedback on the practical status of training programs within the EPA (resources, needs, deliveries, etc) which is quite useful.

Keeping abreast of the training industry (leading technologies, future trends) takes a deliberate and sustained effort to engage networks often outside the federal government. It is a challenge to efficiently use limited research time available, due to the broad scope of topics to monitor (hardware, software, networks, learning styles, delivery methods and interaction, content management techniques and tools, development and production, costs, staffing skills, audience interaction, faculty, … and on and on). NETI should ensure that this is included in performance standards, and that staff are encouraged to pursue this enhancement which broadly supports the institute, but may have little directly visible productivity.

The Annual Training Technology Symposium was a prestigious initiative which not only raised the NETI profile among all federal agencies, but also allowed it to keep abreast of the rapidly changing field. With reduced resources, NETI was unable to continue in a leading role, but NETI should maintain contact with the e-Learning Systems (ELS) Committee (integrated the former OPM-lead TTIG), which operates as an information, work, and advisory group for the federal e-Training Initiative (including golearn.gov).

Office automation has become vital part of managing complex systems (like training) with multiple dispersed users. NETI does a fine job of filling administrative demands, but could find more support (efficiencies, volume, variety) with upgraded electronic systems. Priority attention might be given to reservation handling and customer tracking. A consolidated and centralized facility reservation system that would allow staff to have immediate and up-to-date listing of courses to be delivered in each facility (including contact name, support needs etc) is needed. The Time and Place product has not been user-friendly, nor robust enough for all needs. Good progress has been made on student tracking, and annual reporting.

Another office automation recommendation is that NETI should research digital asset management software. Such a program would organize items (databases, documents, course materials, graphics) into a searchable and retrievable archive catalog. This *might* be possible through expansion of the current NETI Online functionality. For example, the current data system might support a searchable listing of which instructor taught which session at which location and when. In the industry lingo: NETI needs to append it Learning Management System (LMS) with a Learning Content Management System (LCMS). A comprehensive solution for all NETI systems may be cost-prohibitive.

Some standardization within administrative processes would also help (Adobe .PDF downloads versus MS Word, versus maintain WordPerfect).

The practicalities of conducting workgroups over distance (HQ to NETI-West to Regional experts, to delivery sites) should also be worked out to allow better collaboration.

Capturing the expertise of retiring employees should be a priority for content development. Each year sees the loss of experience and knowledge without a consistent approach that would institutionalize and distribute that fleeting and irreplaceable resource.

What are the organizational strengths or assets within NETI that you perceive will help in meeting the emerging environmental enforcement training needs, as well as what are the most significant barriers or challenges that will make it difficult to meet those needs?

States

(1) Organizational strengths that you have would be your resources. You have the resources to put courses on line as well as very talented instructors; you just need additional resources so that they can do what they do best. In addition, you have a good network to get the word out on what you do. Your must significant barrier is that you department has been cut financially each year. In order to be more effective, you need to be out in the field, plain and simple.

(2) REEA sees the strongest asset of NETI as being their ability to coordinate information between Headquarters, the Regions and States (the four Regional Associations) in regard to training course availability, location and provider. They can use the NETI training calendar as a starting point; it is already available on the Internet to all of the potential target audience.

The biggest problem that REEA can identify is obtaining the needed cooperation and communication between the various training providers and the potential "users".

Regions

(1) Good communication w/ Regional contacts, positive attitudes, timely info. & accurate information and willingness to seek feedback from Regions. The national conferences are also very helpful. Possible barriers or challenges include changes in management or HQ priorities or mechanisms to formally assess training needs for states and tribes and EPA employees and funding and lack of a senior enforcement or compliance assistance train the trainer program.

(2) Organizational strengths or assets: effective clearinghouse; NETI staff have good understanding of what makes for quality training; done well developing courses - when resources are made available.

(3)Barriers or challenges: funding; ability to access experts within the agency
Key course development and delivery skills, extensive knowledge of national training needs based on feedback from basic and advanced inspector training courses, ability to deliver a nationally consistent courses of training, ability to evaluate and test on national basis, ability to assess national training needs.

OECA

(1)Strength of NETI is that its sole focus is training and the support of training. Delivery of training is a barrier cost and lack of training dollars and development of new materials too.

(2) NETI needs to better engage and utilize outside experts from the enforcement program offices. They should also facilitate regional experts and cross-regional training. E.g., region 4 offers very good wastewater sampling course - NETI should help take those trainers to other regions to nationalize the course.

(3) NETI has many strengths and along with them some areas of potential weakness, including:

Strength:
      NETI leverages staff throughout the organization to deliver training and/or
      NETI online system
      legal mandate and discrete budget
      Physical facilities in HQ and NETI West
      Many on the staff offer senior expertise in their fields and are therefore available full time to support training.

Weakness:
Other forms of training need financial support that must be concentrated within NETI such as:
      – Contract dollars for a "studio" to broadcast
      – Contract dollars to develop interactive self instructional material- Not necessarily same level of effectiveness as trainers
      – Travel dollars to get experienced trainers on-site
      - May not be available to train when other duties demand attention
      - training is often first to be cut, so centralizing reporting and increasing transparency may leave us more vulnerable.
      - No clear curriculum and career path through the training even though KSAs are listed. Needs to be tied more to things like EPA Inspector Training order etc.
      - Some do not have the expertise to actually deliver the training—not entirely a negative.
      - Need some way to lock in time commitment of experienced personnel and trainers, and integrate it with job performance expectations and accountability.
      - Need improved management systems to hold managers accountable for required training of staff. EPA Inspector Order tries to establish this but was moribund for too long for that to work smoothly now, although recent efforts may have corrected this.

      - Means of identifying needs seems to be based upon culling of regional and HQ requests rather than keying off a curriculum, which means that a HQ perceived need may not get the weight of regional requests for training in absence of a more protracted dialogue. Training needs are a kind of "reality" fix that HQ needs on problems in the field implementing national directives etc. and should be used as a more prominent "opportunity" for program feedback than merely putting needs into a pot. NETI does have annual meeting, but not clear that the right people are committed to attend and whether this is right context for all the dialogues that need to happen.

?) Unclear about status of advisory groups and structure for developing curricula for NETI's target audiences

(4) The barriers may be a combination of the organization NETI is resident in an it's priorities versus the greater training good that could come from a more independent NETI. Lack of even baseline continued funding. Need a promised level for multiple years (say 3 to start) to get everything back on track. Should deliver user needs based training not management driven training. Need a bottom up approach from the field (states, Regions, industry)

Strengths are experience with EPA and its programs, talented specialists in training and facilitation, many products and many good policies, good will from past successful products and presentations, reputation, and an excellent mission.

Future is bright if we can reinvent our training priorities and get a multi-year funding base with cooperative non-EPA partners.

(5) NETI's Jeff Lightner has supported OC's efforts to create and offer Tribal Basic Inspector Training Program. Jeff's work involved both substantive suggestions on creating new training material and time serving as an instructor.

I would suggest that NETI personnel may need additional training to support the "training design consultant" concept ..

(6) Strengths:
- Name recognition and a viable platform at NETI online;
- Established credibility on delivering Basic Inspector Training course on a reasonable frequency and at various locations to accommodate the need;
- Expertise in setting up courses, sending out notices and tracking attendance which position it to help with those aspects of training delivery that often take someone without experience a great deal of time to do;
- Catalogue of resources to develop/deliver courses and course schedule;
- Establishment of curriculum and courses for inspectors, investigators, attorneys, and technical experts;
- NETI could offer services in helping with course development such as training techniques that should be used, identifying which approaches work best with which audiences, and taking on course announcements, registration, issuing certificates and tracking attendance, they would provide a valuable service to technical experts who often develop and offer courses without taking into account who will be attending and their expertise;
- NETI's sole focus is training and the support of training;
- NETI has system already in place to provide services such as training registration, certificates, etc.;
- NETI-online is a popular site that EPA/State employees are familiar with and look at for upcoming training;

♦   A network of regional contacts to distribute news about training and gather information on regional training (on enforcement);

♦   Training rooms set up and available to use for training.

Weaknesses:
♦   Insufficient resources to develop and deliver existing and new courses to meet the curriculum established;
♦   Very large and diverse audience including EPA, states, tribes, locals, each of which has multiple and competing needs;
♦   Not clear which courses NETI has responsibility for developing/delivering
♦   Need to better capture training courses developed/delivered by program offices and regions;
♦   Don't provide sufficient service to help with course development including appropriate training techniques and best approaches to use with specific audiences
♦   Sometimes stray from main mission by assuming responsibilities not assigned within OECA;
♦   Don't provide sufficient leadership on use of new delivery mechanisms such as satellite training, web-based training, CBT;
♦   Need to focus on what they can deliver as opposed to assuming the lead for responsibilities when they aren't the ones providing the funding or doing the work to develop the course or to deliver it;
♦   not enough resources to develop new courses needed or update existing courses.

(7) Over the past several years, NETI's strength has been in supplying administrative support to training. NETI Online has been very helpful in this area by taking care of registration, certificates, reporting, etc. Also, the training rooms that NETI provides are a great asset.

We think that having more communication within OECA about training is a challenge for NETI. In the past, we participated on a workgroup with the other offices regarding training. We didn't meet often, but it was nice to find out what other offices were working on, in terms of training.

A constant challenge that we have is the aversion the regions have to any training that is not done "live." Perhaps NETI could take on trying to change the culture in OECA (I assume it's AA-ship wide) that good quality training can only occur in a traditional classroom setting. An excellent web-based course or two could go far in getting the regions to accept electronic training.

(8) NETI has one of the most dedicated and resourceful staffs our office has had the opportunity to work with. The expertise of the staff in the areas of education and training are just some of the outstanding attributes of the organization. NETI has continually exceeded expectations with their outstanding service and skills on a very limited budget. Additional resources being placed in NETI

can only help to strengthen the overarching goals of OECA and help us to better achieve our mission of protecting human health and the environment.

(9)NETI has the experience after 13 years to assume the dominant role in this area. The biggest challenge will be resources. To develop any new training course of significance will require substantial resources. The other barrier is to educate the enforcement professionals that they should come to NETI first for enforcement and compliance training.

Other AA

(1) Organizational strengths are the people like Zena Aldridge that are very committed to training and are always promoting NETI's training and working on partnerships. The most significant challenge will be for NETI to set aside the necessary resources to fully partner with others in the Agency (like APTI) that do training and have invested in infrastructure to look for opportunities to support each other and to find solutions to our common and also particular problems.

(2) Strengths: NETI has a broad range of faculty and participants. Local enforcement staff may see the trend emerging in a more magnified way then HQs.   Tape this resource with some emerging trend interviews or sessions. Other offices such as OSWER, OCFO, ORD, OAR, OEPI, and EPA-NACEPT Futures Workgroup have conducted emerging trend studies and there are several processes to choose from.

Challenges: NETI or OECA staff does not seem to be involved in the EPA-wide futures and emerging trend work.

NETI Staff

(1) In May 1995 I earned my Masters Degree in Business and Management from Johns Hopkins University. For my final project I analyzed NETI using many strategies. The TOWS Matrix (Threats, Opportunities, Weaknesses and Strengths) was used to identify specifically the Strengths and Weaknesses.

NETI's strengths are: mandated by the Pollution Prosecution Act in 1990; have adequate staffing to deliver training; facility is new (and has been updated); new technology is available; need to establish a vision for the future.

NETI's weaknesses are: lacks defined budget; lacks upper management support; need dollars allocated for training and equipment; and lack of Congress' support of EPA.

(2)Strengths: Basic infrastructure; Reputation; Employees
  Barriers: Lack of funds; Major Contract Vehicle

(3) A reputation for being responsive, and for offering good customer service

Construction and maintenance of state-of-the-art facilities
Training delivered at Regional and state locations in response to identified needs, demand, and for customer convenience
Sharing course materials and adapting content to meet customer needs

The NETI facilities and infrastructure (classrooms, locations, electronics) are premiere assets. The commitment and investment to maintain and upgrade them has been worthwhile and commendable.

The attitude and professionalism of staff are also among the NETI strengths. Since NETI was an amalgamation of reorganized staff, it can not be expected to cover all knowledge, skills and abilities sought in a fully equipped training institute. However, NETI has done well to use the educational and administrative skills (online registration, facilities management) of staff gained in 1994 when technical compliance experts were acquired. Unfortunately, NETI has lost some of that staff expertise. An opportunity now exists to integrate individuals (and other resources) to the "NETI Machine".

Following the staff reorganization years ago, a helpful metaphor was developed to project possible future directions for NETI and to foster staff discussions – it was "*The NETI Machine*". This was useful for a number of reasons: it helped build a unified understanding of each person's roles and responsibilities, specified Divisional resource needs, defined inputs, outputs and assumptions, and focused upon end products and services. Revisiting the big picture of NETI may be helpful to all staff (if not now during restructuring, then after all has settled under new management directives).

A review of the current, the past, and the projected priorities for NETI may be the over-arching means for determining the future direction of NETI. What specializations should NETI develop in-house, versus getting contractor or other support? NETI has accomplished an impressively broad range of accomplishments; however, sustaining the resources needed to continue with such a diverse approach and meet created expectations would be enormous.

The Office of Compliance is rich in technical expertise. NETI does not need to house the best trainers. If residing outside NETI, can a hybrid expert-plus-trainer be given recognition that would enhance their status in their home office?

A similar relationship existed prior to the 1994 OE reorganization: The Air compliance division sustained productive and cordial working relationships with the legal and engineering divisions by each depending upon the expertise of the other. Some of that collegial cooperation may have diminished in the forming of OECA, but NETI could lead the establishment of new and productive relationships by offering what the other divisions lack and currently attain through outside contracting.

Though these issues have been discussed, the decisions thus far don't seem to drive NETI toward a more refined and unified effort. Each team is doing a good job within their area of responsibilities (course delivery, facility management, catalog, liaisons, NETI Online, admin, etc), but a more coordinated program (possibly reduced and simplified) would assist productivity. Taking the time to state general directions (likely many) for all of NETI to consider allows staff to complement each other's projects. This deliberative and holistic approach was successful in the past. These examples are offered to demonstrate how a stated broad objective with momentum can unify the efforts of staff on tangentially related projects:

Consider an actual integrated staff effort: all of the NETI-held videotapes were cataloged (by existing onsite contract support); a section of the NETI Library was reorganized and indexed (by staff); CLE qualified tapes were selected (by ORE liaisons and NEIT staff); and purchased to serve that local audience (attorneys) with a priority need (continuing education credits); a white paper on CLE accreditation was written (incl. state-specific listing) by NETI staff; weekly inspector technical training was captured to videotape from an Air Program satellite network and placed into NETI library holdings; tapes were selected for the "NETI-TV' initiative using a brownbag strategy (for over 1.5 years); "this week" announcements were sent via email to all OECA staff; duplications were made available to OECA experts upon request; walk-up self-service was continuously available to all; the entire collection also served as stock footage for development of various other training materials.

A possible future example, tying all lead project areas into one Basic Inspector Training effort might begin with a purpose review (pre-requisite and complementary to the Advanced Inspector course); reformatting of existing materials; development of new materials (video production and exercise development); a curriculum-driven approach (four particular courses offered two times per year, for three years); delivery methods based upon objective goals (every Region, every year); reformatting the catalog (along curriculum lines, with suggested progression); prioritize the scheduling and facility use and asset purchasing (to meet development timelines, sequencing and locations); loading support documents to NETI Online (standardized downloadable format); and marketing through the Liaison Network; in a format transferable to Highlights and the annual accomplishments report.

Characterizing Air, Water, and Enforcement as being particular "media" offices, means that training is more akin to administration and resource management in that it provides and overlay to all other programs. LAN support teams are similar to training units, in that they provide an overlay service. They are not involved in the content of a particular document as it travels across network wires. LAN teams do however, create a path for the user and monitor the safe conduct of those transactions. Likewise, NETI should provide services (needs analysis, review of learning objectives, contract terms, design consultation, development standards and guidelines, draft review, marketing and distribution assistance) without leading responsibilities better left with the program division (needs determination, expert availability, project management, review and approval, funding). Ultimately, a successful project should be a collaboration with NETI, but prime responsibility should remain with the lead division.

There are obvious and substantial advantages to having technical experts on staff (project liaison, subject leader). On the other hand, a training designer supports the training program (conduct needs/task/situational analyses, work with the subject matter expert (SME), guide the development process, and possibly lead the project), but typically is not expected to provide the subject matter expertise as well. A good instructional designer can sit with any type of expert and apply techniques to extract the expertise, then consolidate and packaged it for transfer without possessing personal experience in the topics handled.

Considering knowledge management, NETI seems undecided regarding staff profile and future hiring needs. Should NETI hire more technical and administrative staff (needed to maintain current approach), or be reframed around specialized training themes (instructional designers, computer programmers, and educational technologists)? Fiscal planning appears to want to continue in both directions. Either core group would only be in addition to (and maybe even secondary to) the management and administrative support specialists that make the machine run.

Considering succession planning, NETI first needs a destination vision. The "NETI Machine" was crafted in two fashions. The first was an "optimized" NETI that placed a PhD of Education in the Director position, supported by managers with degrees in communication, graphic design, business, public admin., etc. Though staff did not agree upon that as a goal, it stimulated rich discussion. Since then, other Federal agencies have established whole divisions of instructional designers (DHS/TSA), or exercise coordinators (FEMA).

Since optimization was fantasy, the staff retreat focused upon getting to an "actualized" NETI, which became the basis for the organizational team structure. NETI need not adopt a course for attaining the "idealized" model, but envisioning staff through dialogue can help set directions and project needs that go beyond line item budgeting.

Organizational change has become a science of its own. NETI might benefit from applying one of those formal matrices during this reorganization season. An in-depth review may not be practicable, but some of these general principles could be overlaid to an assessment of NETI's unique work culture and history, so that imminent changes are not crippled by institutionalized expectations.

Component considerations typically include: revisiting core purpose (mission, goals, clients); envisioning personnel (management, communication); identifying strengths and barriers (real and imagined); empowering agents of change (natural leaders, risk-takers); correcting or removing problems (overcoming resources constraints, reassigning positions, changing methods or processes); augmenting and increasing strengths and successes (offer exemplars, recognize, reward and celebrate); reiterative cycles.

In order for NETI to realize leadership of the OECA training effort, it must have an appropriate level of respect (authority and priority) and resources (people and money). Otherwise, trying to blend an umbrella administrative role for all of OECA, while each

Division maintains course ownership, yields excellence in neither. Even if kept to its current role, NETI should reconsider its prioritization schemes, staff specializations, and evaluation and adjustment processes to maximize efforts. NETI will be challenged to execute risky advancements, while bringing along staff and client comfort with new and unknown technologies and processes. NETI must be not only a technological innovator, but also form the locus and impetus for collaboration.

Ultimately, NETI could serve well at any level given communicative leadership that envisions staff toward defined objectives. The potential is already here and the possibilities are inspiring!

Glossary of Delivery Methods

Asynchronous learning:	Learning in which interaction between instructors and students occurs intermittently with a time delay. Examples are self-paced courses taken via the Internet or CD-ROM, Q&A mentoring, online discussion groups, and email.
Blended learning:	Learning events that combine aspects of online and face-to-face instruction.
Computer-based training (CBT):	An umbrella term for the use of computers in both instruction and management of the teaching and learning process.
Classroom training:	See *instructor-led training*.
Collaboration technology:	Software, platforms, or services that enable people at different locations to communicate and work with each other in a secure, self-contained environment. May include capabilities for document management, application sharing, presentation development and delivery, white boarding, chat, and more.
Distance education:	Educational situation in which the instructor and students are separated by time, location, or both. Education or training courses are delivered to remote locations via *synchronous* or *asynchronous* means of instruction, including written correspondence, text, graphics, audio- and videotape, CD-ROM, online learning, audio- and videoconferencing, interactive TV, and FAX. Distance education does not preclude the use of the traditional classroom. The definition of distance education is broader than and entails the definition of e-learning.
E-learning (electronic learning):	Term covering a wide set of applications and processes, such as Web-based learning, computer-based learning, virtual classrooms, and digital collaboration. It includes the delivery of content via Internet, intranet/extranet (LAN/WAN), audio- and videotape, satellite broadcast, interactive TV, CD-ROM, and more.

ILT (instructor-led training):	Usually refers to traditional classroom training, in which an instructor teaches a course to a room of learners. The term is used synonymously with on-site training and classroom training.
Synchronous learning:	A real-time, instructor-led online learning event in which all participants are logged on at the same time and communicate directly with each other. In this virtual classroom setting, the instructor maintains control of the class, with the ability to "call on" participants.
Web-based training (WBT):	Delivery of educational content via a Web browser over the public Internet, a private intranet, or an extranet. Web-based training often provides links to other learning resources. When used with a facilitator, WBT offers some advantages of *instructor-led training* while also retaining the advantages of *computer-based training*.

The Four Levels of Training Evaluation
(The Kirkpatrick Model)

Level	Definition	Advantages	Disadvantages
Level 1- "Reaction"	Measures trainees' opinions about the course. This Is the most common way to evaluate student reaction to the course and provides a measure of immediate customer satisfaction with content, delivery, and environmental factors. Often referred to as "Smile Sheets."	Low cost and easy to administer. Provides insights to participant's personal feelings about the course. Provides quick feedback on successes and failures to the training provider.	Only reflects a quick reading of the participant while they are still in the class. Results should not be used as a solid basis for changing the educational content or strategy
Level 2- "Learning"	Measures how well participants have mastered the course objectives. Can include tests of performance immediately before and after the course.	Compared to level 1, this provides more compelling evidence of whether the training program works.	Requires more time and money than level 1. Also requires greater insight to the evaluation process to develop valid measures of learning.
Level 3- "Behavior"	Assesses practical value of training. Measures how well the knowledge, skills, and/or values from the course are used in the job. Typically measured 3-6 months after the course.	Provides stronger evidence that the investment in training yields the desired return. If designed properly, can also identify barriers and obstacles to improved performance.	Requires significantly more investment of time and money. Requires in-depth insight into performance interventions and root causes of performance deficiencies.
Level 4- "Results"	Measures performance improvement, quality improvements, and cost savings to the organization. Measures the return on investment of the training course.	Provides strong evidence that training program has impact on organization. Addresses whether the performance is important to the organization's bottom line (e.g., production, safety, sales).	Substantial levels of investment and expertise are required to develop level 4. Often hard to decide whether or not this level is required. Linkage from training to org'1 results is hard to establish.