



United States Department of the Interior

OFFICE OF SURFACE MINING
RECLAMATION AND ENFORCEMENT
Washington, D.C. 20240



Directive: OPM-1

Title: Office of Surface Mining Reclamation and Enforcement Directives and Standard Operating Procedures System.

Approval: Glenda H. Owens, Deputy Director _____

1. Purpose

The Office of Surface Mining Reclamation and Enforcement (OSMRE) Directive OPM-1 establishes the OSMRE Directives and Standard Operating Procedures (SOP) System, which is used to document and convey the Bureau's policies, programs, and procedures. Directive OPM-1 also establishes the process and procedures for maintaining OSMRE's Directives and SOP System, for modifying or removing existing directives and SOPs, and for adding new directives and SOPs to the Bureau's inventory. This directive is established in accordance with Department of the Interior Departmental Manual, Part 381, Chapter 1 (381 DM 1), *Directives Management*.

2. Summary of Changes

- a. Delegates authority to Assistant Directors, Regional Directors, and Staff Office Heads (AD/RD/SOH)¹ for maintaining appendices when updates to content do not materially or substantively alter OSMRE's policy position. This delegation allows for increased efficiency when updating supporting materials such as handbooks and templates.
- b. Introduces *Appendix Revision Log* (Appendix E) to aid responsible AD/RD/SOH in completing and tracking updates to appendices.
- c. Introduces *Action Summary* (Appendix F) to clarify action specific templates, procedures, and guidance for any possible directive or SOP action.
- d. Removes *Comment Form* (Appendix D in previously issued version). Review and comment to proposed directive actions will be done collaboratively in a shared electronic environment eliminating the need for individual comment forms.
- e. Removes *Process Flow* (Appendix E in previously issued version). The flow charts in previous issued version did not account for all possible variables in the directives and SOP processes. To clarify the unique requirements for each possible directive or SOP action, *Action Summary* (Appendix F) was developed.

¹ "Staff Office Heads" refers to the chiefs of the following offices: Administration, Communications, Equal Opportunity, Human Resources, Information Resources, and Planning, Analysis and Budget.

- f. Restricts primary use of Change Notice to rescinding an existing directive. Previously, Change Notices were also used to modify existing directives and were published as separate files without updating the base directive. To improve end user clarity and efficiency during the approval process, the base directive itself will be updated, as needed, instead of issuing a separate Change Notice.
- g. Removes the Date and Transmittal Number fields from page one. The date a directive is signed will be indicated in the digital signature block.
- h. Improves compliance with Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794 (d)).
- i. Updates organizational terminology, responsibilities, and procedures.

3. **Policy**

Directives are written communications used to establish OSMRE policy and high-level procedures. Directives are maintained on OSMRE's publicly facing web page. SOPs are written communications that do not establish OSMRE policy. SOPs prescribe specific procedures to be followed routinely for the performance of designated operations or in specific situations. The goal of SOPs is to ensure OSMRE consistently adheres to existing policy or high-level guidance (e.g., statutes, Department of the Interior policies, OSMRE directives, federal manuals, regulations, etc.). SOPs are maintained on OSMRE's intranet. Directives and SOPs will be organized systematically and readily available to users. They should provide users with only necessary information and be written in a clear, concise manner and in the simplest and most easily understood language for the intended audience. OSMRE Assistant Directors, Regional Directors, and Staff Office Heads (AD/RD/SOH) have the authority to issue, modify, or rescind a SOP. Only the Director has the authority to issue, modify, or rescind a directive.

4. **Responsibilities**

- a. Director. Responsible for issuing all directives and change notices.
- b. Assistant Directors, Regional Directors, and Staff Office Heads (AD/RD/SOH). The AD/RD/SOH will:
 - (1) Employ their awareness and assessment of their operating environment to determine the need for creation, modification, and/or rescission of directives and SOPs;
 - (2) Create and maintain directives, SOPs, and supporting materials ensuring they reflect the most current statutory, regulatory, and policy requirements;
 - (3) Review and resolve comments or suggested changes to draft directives and SOPs prepared within their program area;

- (4) Review and provide comments or suggested changes to draft directives and SOPs presented for review by other AD/RD/SOH offices;
 - (5) Prepare final proposed directive actions for the Director's signature;
 - (6) Issue and rescind SOPs;²
 - (7) Ensure that, in accordance with this directive, background materials are provided to the Directives Coordinator and to the Office of Communications as appropriate; and
 - (8) Participate in the biennial review of directives and SOPs.
- c. Chief, Office of Administration. Responsible for developing and maintaining the overall Directives and SOP System and designating a Directives Coordinator.
- d. Directives Coordinator. The Directives Coordinator will:
- (1) Serve as OSMRE's primary point of contact and subject matter expert for the Bureau's Directives and SOP System;
 - (2) Work with the Director's Office and AD/RD/SOH to develop, finalize, and disseminate new or revised directives in accordance with the procedures provided in this document;
 - (3) Retain directive materials in accordance with prescribed records retention policies and procedures;
 - (4) In conjunction with the Office of Communications, maintain OSMRE's publicly accessible directives web page ensuring the most current issuances of electronic directives materials are posted;
 - (5) Assist in the maintenance of OSMRE's intranet pages hosting SOPs and archived directives;
 - (6) Coordinate biennial directives and SOP review; and
 - (7) Provide regular and recurring advisory notices to all OSMRE to aid in the use of the Directives and SOP System.

² Assistant Directors and Regional Directors are generally the SOP issuing authority for activities within their AD/RD organization. However, this authority may be delegated to Field Office Directors, Division Chiefs, or equivalent positions within the AD/RD organization.

- e. Office of Communications (OC). The Office of Communications will:
- (1) Review and publish approved directive actions requested by the Directives Coordinator on OSMRE's publicly accessible directives web page;
 - (2) Receive electronic rescinded, retired, or inactive directives materials from the Directives Coordinator for maintenance in archive status on the OSMRE intranet;
 - (3) Receive electronic SOP materials from the issuing AD/RD/SOH for maintenance on the OSMRE intranet; and
 - (4) Provide guidance and assistance, as needed, with Section 508 compliance requirements in their role as the Bureau's Section 508 coordinating office.

5. **Procedures**

- a. The following procedures will be used to prepare, process, review, revise, and rescind OSMRE directives.
- (1) The AD/RD/SOH responsible for maintaining OSMRE policy necessary to support a statute, regulation, related policy, or other formal requirement based on the authorities delegated in OSMRE Directive OPM-5 or other authoritative source, maintains an ongoing awareness of their operating environment. Based on this awareness, the responsible AD/RD/SOH assesses whether existing OSMRE directives accurately reflect the policies required to effectively implement their program areas. This assessment will consider organizational changes; legislative changes; impact to OSMRE delegations of authority; and the impact of other events influencing the continued need of an existing directive or the need for a new directive.³
 - If the assessment indicates that all aspects of the directive remain valid and correct, then no immediate action is required by the responsible AD/RD/SOH. See 5.a.(11) for periodic review instructions.
 - If the assessment indicates that: (1) a new directive is needed; (2) updates are required to an existing directive (including adding or removing any appendix); (3) updates are required to any directive appendix *content* that materially or substantively alters OSMRE's policy position; or (4) rescission of an existing directive is

³ Unless specifically required, OSMRE should not issue or maintain a directive simply to restate existing policy issued by the Department of the Interior, or other appropriate authority, when that existing policy is otherwise suitable for use by OSMRE. Instead, the responsible AD/RD/SOH should consider issuing supporting Standard Operating Procedure(s) to ensure OSMRE adheres to the existing policy. See paragraph 5.b.

necessary, the responsible AD/RD/SOH will utilize procedures beginning in paragraph 5.a.(2). Note: The primary purpose of a Change Notice is to rescind an active directive. When proposing a rescission, use the *Change Notice Template*, presented in Appendix C. When it is necessary to change the content of an active directive, or any appendix content that materially or substantively alters OSMRE's policy position, regardless of the scope of the change, a Change Notice will not be used. Instead, the responsible AD/RD/SOH will prepare a new directive or appendix utilizing the procedures beginning in 5.a.(2).

- If the assessment indicates that updates are required to appendix content that does **not** materially or substantively alter OSMRE's policy position, the responsible AD/RD/SOH will prepare and provide the modified appendix and an *Appendix Revision Log*, presented in Appendix E, to the Directives Coordinator for update to OSMRE's publicly accessible directives web page. All modified appendices must comply with Section 508 standards.⁴ Modified appendices that do not comply with Section 508 standards will not move forward in this process. Responsible AD/RD/SOH are required to retain all versions of appendices for reference, if needed.

To further assist responsible AD/RD/SOH in this determination, proposed directive actions are available in *Action Summary*, presented in Appendix F.

- (2) The responsible AD/RD/SOH, based on assessment of their operating environment, advises the Director when a proposed directive action is necessary.
- (3) The responsible AD/RD/SOH, in conjunction with subject matter experts in their program areas,⁵ prepares the proposed directive action utilizing action-specific guidance found in *Action Summary*, presented in Appendix F. Some directives actions require an additional redline version indicating proposed changes. This will assist during the review process beginning in paragraph 5.a.(4). When a proposed directive action includes requirements for other AD/RD/SOH offices, the responsible AD/RD/SOH will coordinate development of the proposed directive action with the impacted office in advance, as appropriate. Directive materials must comply with Section 508 standards.⁴ Directive materials that do not comply with Section 508 standards will not move forward in this process. Upon

⁴ Section 508 of the Rehabilitation Act (29 U.S.C. § 794 (d)), as amended by the Workforce Investment Act of 1998 (P.L. 105-220). Visit <https://www.section508.gov> or contact the OSMRE Office of Communications for additional information, tools, and guidance.

⁵ May include DOI Solicitor at the discretion of AD/RD/SOH.

completion, provide all electronic draft directive materials to the Directives Coordinator.

- (4) The Directives Coordinator reviews draft directive materials for compliance with OPM-1. Noncompliant materials will be returned to the originator for revision. The Directives Coordinator distributes compliant draft directive materials electronically to all AD/RD/SOH for a formal review period of no less than 15 working days. If the directive materials are unusually complex the Directives Coordinator may, in conjunction with the responsible AD/RD/SOH, specify a formal review period of more than 15 working days. If a proposed directive action is limited to minor typographical updates, or is the result of a higher-level mandated change, the Directives Coordinator and responsible AD/RD/SOH will determine if the approval process can proceed directly to paragraph 5.a.(8).
- (5) The reviewing AD/RD/SOH, in conjunction with subject matter experts within their program areas, performs a comprehensive review to ensure the materials are necessary, accurate, complete, without excessive detail, and do not conflict with other existing policies. Reviewers provide electronic comments or suggested changes to the distributed draft materials that are consistent with instructions provided by the Directives Coordinator. Conflicting comments or suggested changes from the same office will be resolved by the appropriate AD/RD/SOH. Any AD/RD/SOH may submit a request to the Directives Coordinator for extension to the published formal review period. Extension requests will generally be accommodated to ensure the highest quality review of proposed directives by all offices. Only in unique circumstances will an extension request not be accommodated by the Directives Coordinator.
- (6) At the conclusion of the formal review period, the Directives Coordinator restricts electronic access to the draft materials and saves a copy of all electronic files for reference. The Directives Coordinator provides all materials to the responsible AD/RD/SOH for review and resolution.
- (7) The responsible AD/RD/SOH considers each comment or suggested change for inclusion or rejection. Rejected comments and suggested changes will be annotated by the responsible AD/RD/SOH in accordance with review instructions provided by the Directives Coordinator. Unless a compelling reason exists to do otherwise, the responsible AD/RD/SOH shall communicate any proposed rejection of comments or suggested changes to the reviewing office before finalizing the rejection decision. Upon completing final edits, which reflect all changes made during formal review, the responsible AD/RD/SOH retains the working files of all directive materials. The responsible AD/RD/SOH also ensures that edited directive materials are Section 508 compliant before providing an

electronic copy of all final proposed directive action, including the rejected comments and suggested changes, to the Directives Coordinator.

- (8) The Directives Coordinator validates that all final proposed directive materials comply with Directive OPM-1 requirements, to include Section 508 requirements. The Directives Coordinator will return noncompliant materials to the responsible AD/RD/SOH for correction. The Directives Coordinator will transmit compliant materials to the Director for review and signature.
 - (9) The Director reviews the proposed directive materials and either: approves the materials by digitally signing; or disapproves by not signing and provides a summary of why the materials were disapproved. In either case, all materials are returned to the Directives Coordinator for action.
 - (10) The Directives Coordinator returns disapproved directives materials to the responsible AD/RD/SOH. The Directives Coordinator maintains electronic versions of signed directives and all supporting materials. In conjunction with Office of Communications, the Directives Coordinator ensures approved directives materials are posted on OSMRE's publicly accessible web page. The Directives Coordinator will coordinate with Office of Communications for any proposed action-specific web procedures as outlined in *Action Summary*, presented in Appendix F, as needed.
 - (11) As discussed in 5.a.(1), the responsible AD/RD/SOH maintains an ongoing awareness of their operating environment. Based on this awareness, the responsible AD/RD/SOH assesses whether OSMRE directives accurately reflect the policies required to effectively implement their program areas. To support responsible AD/RD/SOH in this effort, and to comply with the requirements stated in 381 DM 1, the Office of Administration will coordinate a biennial review of OSMRE directives to be completed by responsible AD/RD/SOH.
- b. The following procedures will be used to prepare, process, review, revise, and rescind OSMRE SOPs.
- (1) The AD/RD/SOH responsible for maintaining OSMRE policy necessary to support a statute, regulation, related policy, or other formal requirement based on the authorities delegated in OSMRE Directive OPM-5, or other authoritative source, maintains an ongoing awareness of their operating environment. Based on this awareness, the responsible AD/RD/SOH assesses whether OSMRE SOPs prescribe accurate and replicable procedures to ensure consistent adherence to existing policy or high-level guidance.

- If the assessment indicates that all aspects of the SOP remain valid and correct, then no immediate action is required by the responsible AD/RD/SOH.
 - If the assessment indicates a new SOP or changes to an existing SOP are needed, the responsible AD/RD/SOH, in conjunction with subject matter experts in their program areas, prepares the proposed SOP action utilizing action-specific guidance found in *Action Summary*, presented in Appendix F.⁶ SOP materials must comply with Section 508 standards. In instances where processes defined in a SOP bridge multiple AD/RD/SOH areas of responsibility, the responsible AD/RD/SOH will coordinate, as needed, with impacted organizational elements. If appropriate, a SOP may be jointly developed and issued by multiple AD/RD/SOH.
- (2) The responsible AD/RD/SOH provides the draft SOP materials to affected AD/RD/SOH offices for review and comment, as appropriate, to ensure the SOP can be implemented by the intended users. The responsible AD/RD/SOH approves SOPs by signing with digital signature exclusively.
 - (3) The responsible AD/RD/SOH coordinates directly with Office of Communications to ensure the appropriate web procedures are completed in accordance with action-specific guidance found in *Action Summary*, presented in Appendix F.
 - (4) All current and rescinded SOP materials are maintained by the responsible AD/RD/SOH's program area in accordance with their record management practices.
 - (5) As discussed in 5.b.(1), the responsible AD/RD/SOH maintains an ongoing awareness of their operating environment. Based on this awareness, the responsible AD/RD/SOH assesses the need for creation or maintenance of SOPs. To support responsible AD/RD/SOH in this effort the Office of Administration will coordinate a biennial review of OSMRE SOPs to be completed by responsible AD/RD/SOH.

6. **Reporting Requirements**

Responsible AD/RD/SOH report the results of the biennial review of directives and SOPs in accordance with the instructions published by the Office of Administration.

⁶ AD/RD/SOH should attempt to follow the SOP template's format. It may be more appropriate, however, to deviate from the provided format to better communicate the SOP's content to the reader. Final decisions on SOP format are made by the responsible AD/RD/SOH.

7. **Effect on Other Documents**

When issued, this version of Directive OPM-1 supersedes all previous versions and subsequent Change Notices.

8. **References**

- a. <https://www.plainlanguage.gov/>.
- b. <https://www.section508.gov/>.
- c. [Departmental Manual 381 DM 1](#).

9. **Effective Date**

Upon signature.

10. **Distribution**

By electronic format. All OSMRE directives are publicly available at <https://www.osmre.gov/laws-and-regulations/directives>.

11. **Appendices**

See the OSMRE directives page linked in the “Distribution” section above for links to appendices.

- a. Subject Code Identification.
- b. Directive Template.
- c. Change Notice Template.
- d. Standard Operating Procedure Template.
- e. Appendix Revision Log.
- f. Action Summary.

12. **Contact**

Office of Administration, Directives Coordinator.