



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 9 2011

OFFICE OF
ADMINISTRATION
AND RESOURCES
MANAGEMENT

MEMORANDUM

SUBJECT: Response to the Office of the Inspector General's Final Report "EPA Needs Better Agency-Wide Controls over Staff Resources," Report Number 11-P-0136

FROM: Craig E. Hooks
Assistant Administrator

A handwritten signature in black ink, appearing to read "Craig E. Hooks", written over the printed name and title.

TO: Arthur A. Elkins, Jr.
Inspector General

This is in response to the final subject report on the Environmental Protection Agency's Position Management Program. The Office of Administration and Resources Management concurs with the recommendation contained in the report. OARM will address this recommendation through the development of a new Agency Order on position management by the staff in the Office of Human Resources' policy division. This will replace the previous "Position Management and Control Manual," dated January 27, 1982, which was cancelled on April 2, 2010.

The Order will contain specific guidance to the human resources community, management and supervisors on the importance of having a sound position management program, including a review of best practices. We anticipate the new Agency Order to be in place by September 30, 2011. We have attached a corrective action plan with the major milestones needed to address your recommendation and a copy of the draft Order.

We appreciate your efforts and concerns about the Agency's Position Management Program. If you have any questions or need additional information, please contact me at (202) 564-4600 or have your staff contact Kimberly A. Lewis, Director, Office of Human Resources or Susan Kantrowitz, Deputy Director, Office of Human Resources at (202) 564-4606.

Attachment

cc: Nanci E. Gelb
Kimberly A. Lewis
Susan Kantrowitz
Wade Najjum
Eric Lewis

Audit Follow-up Corrective Action Plan (CAP)

Title of Audit Report:	EPA Needs Better Agency-Wide Controls over Staff Resources
Number of Audit Report:	11-P-0136
Date of Report:	February 22, 2011
Lead Office for Audit:	Office of the Inspector General
Coordinating HQ/Region Offices:	Office of Administration and Resources Management
OIG Lead/POC:	Arthur A. Elkins, Jr.

OIG Report Recommendation	Proposed Corrective Action(s), Milestones and Supporting Documentation	Proposed Corrective Action Date	Actual Corrective Action Date	Responsible Office(s)
<i>Formal Extension Request Date</i>	<i>OIG and/or OARM AA Response (comments and related dates)</i>			
The Environmental Protection Agency establishes an Agency-wide workforce program that includes controls to ensure regular reviews of positions for efficiency, effectiveness, and mission accomplishment.	<ul style="list-style-type: none"> • Completion of Position Management Order Draft's internal review • Stake Holders review and comment period • Placement into Directives Clearance Review Process • Submission for final approval • Position Management Order issue date 	<p style="text-align: center;">June 10, 2011</p> <p style="text-align: center;">June 13- 24, 2011</p> <p style="text-align: center;">August 1, 2011</p> <p style="text-align: center;">August 26, 2011</p> <p style="text-align: center;">September 30, 2011</p>		Human Resources Policy Division

Audit Follow-up Corrective Action Plan (CAP)

<p>Responsible Managers:</p> <p>_____</p> <p>Signature/Date</p> <p>Kimberly A. Lewis Director, Office of Human Resources</p>	<p>_____</p> <p>Signature/Date</p> <p>Craig E. Hooks Assistant Administrator, Office of Administration and Resources Management</p>
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Responsible Office(s)	Actual Corrective Action Date	Proposed Corrective Action Date	Proposed Corrective Action(s), Milestones and Supporting Documentation	Old Report Recommendation
Human Resources Policy Division			<ul style="list-style-type: none"> Position Management O-ls issue date Submission for final approval August 28, 2011 Review Process Placement into Director's Office August 1, 2011 State Holders review and comment June 13-24, 2011 Completion of Position Management Order Grant's interim review June 10, 2011 	<p>The Environmental Protection Agency establishes an agency-wide workforce program that includes controls to ensure regular review of positions for efficiency, effectiveness, and position reclassification.</p> <p>Formal Extension Request Date</p>

U. S. Environmental Protection Agency

OFFICE OF HUMAN RESOURCES



Position Management

EPA ORDER:

DATE:

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Section 1 – Introduction

Federal agencies are created by law and Executive Order to accomplish specific missions in the furtherance of Agency goals. Federal managers and supervisors who have delegated authority have the obligation to structure the agency in a manner that will assure that assigned missions are legally, efficiently, and effectively accomplished. The structuring process involves the assignment of missions and tasks to major organizational parts and eventually to the position. The Federal classification system allows considerable freedom and flexibility for Federal managers to establish an organizational structure that is not only efficient but also cost conscious.

Position management can be defined as a carefully designed position structure that blends the skills and assignments of employees with the goal of successfully carrying out the organization's mission or program. Sound position management shows a logical balance between employees needed to carry out the major tasks of the organization and those needed to give adequate support; between professional employees and technicians; between fully trained employees and trainees; and between supervisors and subordinates.

Position management also requires consideration of grade levels for the positions involved. Grades should be commensurate with the work done to accomplish the organization's mission and should not exceed those grades needed to do the work of the program office. A carefully designed position structure will result in reasonable and supportable grade levels.

1-1. Purpose

The purpose of this policy is to give supervisors and managers in the Environmental Protection Agency guidance on the use of position management. It is the intention that this policy will give support to the Environmental Protection Agency's offices to establish positions in sound organizational structures that meet assigned missions and make the best use of position management practices. Position Management affects work outcomes, customer satisfaction, cost of operations, and employee satisfaction.

1-2. Goals

The goals of position management are:

- (1) To strengthen the Environmental Protection Agency's position management practices so that each organization is staffed to best serve the mission of the agency following official statements of organization and function; optimize economy, productivity and organizational effectiveness;
- (2) To follow the Position Classification Plan established under Chapter 51, Title 5, United States Code, in establishing and keeping up with positions to do the agency's legally assigned work in the most effective and efficient manner;
- (3) To pursue position management practices that achieves proper balance among mission needs, efficiency of operations, and effective use of employees;
- (4) To ensure that jobs are correctly classified per the Office of Personnel Management's position classification standards and directives;
- (5) To ensure that position analysis is effectively accomplished and that position descriptions are current, specific, and correct;

- (6) To increase productivity by implementing and adhering to quality management principles that include the elimination of unnecessary vacant positions and the avoidance of position design practices which fragment grade controlling duties and cause an increase in operating cost; and
- (7) To ensure positions are structured to avoid conflict or overlap with other positions, and to serve as an effective tool for recruitment, training, advancement, and evaluation of a quality work force.

1-3. References

5 United States Code, Chapter 51

U. S. Office of Personnel Management Classification Standards

5 Code of Federal Regulations Part 335

5 Code of Federal Regulations, Chapter 511

The Organization and Functions Manual 2000 dated 10 July 2003

1-4. Coverage

This policy is applicable Agency-wide and encompasses all positions including General Schedule, Trades and Labor, Senior Executive Service, Public Health Service Commissioned Officer, Expert and Consultant, and excepted categories.

1-5. Supersession

This policy supersedes the Agency's Position Management and Control Manual dated 27 January 1982.

1-6. Definitions

- A. *Career Ladder Position*: A position restructured to allow for entry at a lower grade level than the full performance grade level which allows for progression to the full performance level. The career ladder refers to the range of grades to which the employee may be promoted noncompetitively up to the classified full performance level of the position.
- B. *Counterproductive Fragmentation*: An organization is split into many unnecessarily small segments. This causes over specialization and restricts employee development, prevents effective communication, and requires more supervisors.
- C. *Excessive Layering*: Unnecessary organizational levels exist. This interferes with communication and restricts responsibility of lower level supervisors.
- D. *Inconsistencies among Position Descriptions*: Individual position descriptions have been revised without considering similar positions in the organization.

- E. *Job Dilution*: Lower level work carried out by higher-graded employee which results in higher cost and can cause low morale among employees whose positions have been diluted with lower level duties.
- F. *Mismatched Strength and Workload*: Too few or too many people are assigned to accomplish the mission.
- G. *Missing Career Ladders (also called dead end positions)*: These are positions that have no promotion potential or no opportunity for added development or movement to a higher graded job within the organization
- H. *Narrow Span of Control*: Scope of employee supervisory responsibility is limited. This results in higher cost and is usually a direct result of counterproductive fragmentation and excessive layering.
- I. *Position Classification*: The analysis of a position's duties, responsibilities, and qualification to determine the position's title, series, and grade level per classification standards issued by the Office of Personnel Management.
- J. *Position Description*: A statement of the major duties, responsibilities, and supervisory relationships of a position. The description of each position must be kept up to date and include information about the job which is significant to its classification.
- K. *Position Management*: The continuous and systematic process that includes organization and position design, and position classification. Position management overlaps with the recruitment and retention process, is used to determine training and development needs, and is part of the promotion process.

1-7. Responsibilities

- a. The Assistant Administrator, Office of Administration and Resources Management or designee is appointed as the Agency Position Management Officer and will:
 - (1) Oversee the effective conduct of the Environmental Protection Agency's position management practices, evaluating management's attention to position management, and reporting on the effectiveness of the agency's position management practices to interested parties.
- b. Assistant Administrators, Regional Administrators, and the Chief of Staff for the Office of the Administrator or their designee will be responsible for assuring the implementation of the Agency's Position Management policy in their organizations and will:
 - (1) Maximize utilization of existing personnel, management analysis, equal opportunity, program planning and administrative staffs in doing the required analysis needed to assure effective position management.
 - (2) Give staff guidance in position management to subordinate organizations, managers, and supervisors.
 - (3) Assure continuous attention to position management within their offices.
 - (4) Evaluate position management within their offices, recognize effective action, and direct corrective action, as necessary.
 - (5) Assure reviews of all positions and certify as to their need at least every three years.
 - (6) Assure a review of each vacant position and make a determination whether duties may be reassigned or the position may be abolished without seriously affecting the execution of essential roles.

- (7) Establish office position management programs, as suitable, to supplement the national program.
- c. Managers and supervisors or designee who have the authority to establish, abolish, or assign duties to positions will:
- (1) Assign employees to do the duties described in their official position descriptions or duties to which they are officially detailed or temporarily promoted.
 - (2) Ensure every position in their organization has a correct and certified position description which gives a clear and definitive description of the primary duties of each position under their scope of responsibility.
 - (3) Ensure that position descriptions correctly show the duties and responsibilities assigned to their employees, and rate employees against those duties and responsibilities in the position description.
 - (4) Ensure that employees in career ladder positions are given increasingly difficult assignments and training to prepare them for the next higher grade.
 - (5) Evaluate the impact of changes in tasks and ensure prompt action to recommend reclassification of positions based on changing work needs.
 - (6) Review and revise position descriptions to ensure that grade levels are not improperly inflated to levels that do not promote efficiency.
 - (7) Review vacancies and determine whether positions should be restricted and filled at lower levels.
 - (8) Ensure that the grade-controlling duties in a position description are done at least twenty-five percent of the time.
 - (9) Consult with the Shared Service Center when review of work and performance indicate a change in grade.
- d. The Director, Office of Human Resources or designee will:
- (1) Give leadership and guidance in Position Management as it pertains to his or her functional responsibilities.
 - (2) Publish and distribute information on Position Management.
 - (3) Give feedback to the Assistant Administrator, Office of Administration and Resources Management on the administration of Position Management throughout the Agency with recommendations for improvement.
 - (4) Report on the effectiveness of the Position Management Program practices to the Assistant Administrator, Office of Administration and Resources Management.
 - (5) Analyze organizational proposals and prepare and give recommendations on organizational proposals, including necessary action documents, to higher authority.
 - (6) Conduct or administer special reviews to find possible improvements in the Position Management Program.
 - (7) Make periodic evaluations of trends toward or away from the goals of this policy for the information of interested parties.
 - (8) Give guidance in the effective conduct of the Position Management Program.
- e. The Directors, Shared Service Centers or designee will:

- (1) Give advice in the evaluation of position management activities, aimed at preventing and eliminating counterproductive fragmentation, excessive layering, unnecessary positions, job dilution, inconsistencies among position descriptions, and narrow spans of control by utilizing organization charts when working with their servicing organization.
- (2) Pinpoint and resolve position management, classification, diversity, and staffing issues before promotion or classification decisions are made to ensure merit systems principles are adhered to.
- (3) Conduct periodic position reviews to gather first-hand information about a position to ensure position descriptions are correctly classified.
- (4) Analyze adverse trends (e.g., increase in average grade, number of supervisors, numbers of higher graded positions, etc.) for cause and give help to responsible program/regional offices of the organization serviced in accomplishing corrective action.
- (5) Give support to managers and supervisors in analyzing the personnel aspects of position structures and suggest alternative structures to achieve improvements in position management.
- (6) Organize and give position management training for all supervisors as part of or as a supplement to the training required for all first-line supervisors.
- (7) Conduct reviews of positions every three years, in conjunction with program managers and supervisors, and where suitable, recommend improvement(s) in position management.
- (8) Work closely with the supervisor to ensure that full performance levels have been established as shown as promotion potential on pertinent documents
- (9) Ensure that all statutory and regulatory needs have been met when establishing positions.

f. Employees should:

- (1) Review their position description to ensure that it correctly shows the duties they are doing and work with their supervisor to resolve any grade controlling discrepancies.
- (2) Actively pursue and satisfactorily complete assignments and/or training that will prepare them for advancement.

Section 2 – Position Management

2-1. General

Position management is essentially a responsibility of management/supervisors and manifests itself in the way in which management combines duties and responsibilities, assigns work, and establishes organizations. Position management is in the manner in which management chooses to formulate positions and structure organizational entities. As such, position management encompasses position classification and gives the framework upon which position classifications are based.

Position classification primarily concerns itself with the application of Government-wide job standards and classification principles to positions to establish the proper pay plan, title, series, and grade (all of which contribute to a position's rate of basic pay) by dealing with duties, responsibilities, and work assigned by management in an organization structure established by management.

Nonetheless, the position classification process is not complete until and unless adequate consideration has been given to position management, both by those authorized to make changes in an organization and job structure and by those authorized to classify the positions thereby affected.

As a result, position management, rather than position classification, is the dominant factor influencing the extent to which an organization approaches the most utilization of human resources, particularly in terms of financial resources.

While determining job content and organizational structure is the prerogative of management, support entities (including human resources staff, budget staff, and etc.) play a key role in recommending management in carrying out these responsibilities following sound position management practices. A full and open partnership should exist between line management and the human resources staff in weighing the position management and classification impact and consequences of proposals affecting organization, work assignments, and changes in job content.

2-2. Policy

Position Management gives a foundation to structure organizations in a manner that will ensure organizational missions are efficient, effective, and legally accomplished. It is the policy of the Environmental Protection Agency to structure organizations and positions to optimize efficiency and organizational effectiveness so that:

- a. Positions are established and kept based on sound position management practices, the type of work to be done, and the costs and benefits of the organizational structure on providing customer service and meeting organizational needs.
- b. Organizations are streamlined by preventing and eliminating counterproductive fragmentation, excessive layering, unnecessary positions, job dilution, inconsistencies among position descriptions, mismatched strength and workload, and narrow spans of control.
- c. Each proposed change of organization or position structure will be reviewed and approved as proper from the stand-point of work design, occupational distribution, grade distribution, manpower needs, and cost.

- d. No position is upgraded unless the organizational work pattern is thoroughly reviewed and approved by the respective Shared Service Center to determine the necessity for assigning duties and responsibilities as high as the grade being proposed.
- e. Vacancies are reviewed, before filling, to determine whether the duties of the position can be eliminated, assigned to other positions, or modified to allow performance at a lower level.
- f. Desk audits may be asked for at anytime by supervisors, managers, and employees.
- g. Wasteful and inefficient practices are identified and eliminated.
- h. Supervisor to employee ratios are optimized.
- i. Techniques are incorporated to effectively make possible the recruitment and retention of highly qualified individuals, and utilize the greatest resources of the Agency's human workforce and the fiscal resources towards meeting the Agency's mission.
- j. The balance between employee motivation and incentives, economy and efficiency, and mission is supported to ensure fair workload distribution is optimized.
- k. Personnel are developed to keep up with and enhance their competencies and effectiveness through training, development, and education programs.
- l. All positions are reviewed, at least every three years, for essentiality, and nonessential work is eliminated and unnecessary positions abolished.
- m. All positions are described and classified per governing rules, regulations, and standards.
- n. Human Resources and other staff such as budget will be involved in position management to ensure the identification and implementation of effective and economical alternatives for organizations and positions.
- o. Whenever possible, hires at the "entry" or "technician" level are made to ensure a balance between employees who do the full performance level duties of the program office and the development of employees who do routine and lower level tasks.
- p. Career ladders should only be established when there is available senior staff with the breadth and scope of technical knowledge necessary to train the employee.
- q. Positions requiring unique, specialized qualification where there is no staff available or knowledgeable to train or develop the employee, career ladder should not be established.
- r. Positions are established in such a way as to encourage career development and allow cross-training, consistent with the need to recruit and keep a diversified work force.
- s. All position must be discussed during the annual performance process between supervisors and employees to insure position description and classification accuracy.
- t. Experts and consultants are utilized in strict compliance with governing rules and regulations.
- u. Decisions made on the Position Management Program should be per the applicable bargaining agreements.
- v. For a position where anything less than full performance would put the agency or any of its organizations at risk, a career ladder should not be established.
- w. Career ladders should not be established for supervisory positions.
- x. Unless higher graded duties are assigned for developmental purposes, employees should be assigned only to those duties and responsibilities relevant to the grades of their position.
- y. Multipurpose position descriptions should be considered whenever a group of same positions exist. This is particularly effective when the manager/supervisor wishes to use uniform or standardized organization patterns/procedures in different locations where the same activities are to being done.

2-3. POSITION MANAGEMENT BASICS

Position management is the one Federal human resource management task that does not have a strict rule or regulation. Position management is the continuous and systematic process used to determine how many positions are needed; how jobs should be designed, and what organizational structures are needed to accomplish the functional assignments (the mission) of the program office.

The position management process is carried out so that the mission of the program office is accomplished in the most economical, efficient, and effective way possible by all levels of employees. It aims at achieving the following three operating virtues:

- (1) **ECONOMY** - Getting the mission accomplished with the least outlay of dollars.
- (2) **EFFICIENCY** - Accomplishing the mission economically in the timeliest manner with the least wasted effort possible
- (3) **EFFECTIVENESS** - Getting the work done using the proper tools and personnel in a positive work environment that supports the best balance of economy and efficiency.

Position management is often referred to as a “micro approach” because it deals with the daily operations of the program office. The process is literally concerned with managing positions. The supervisor is required to strike a balance between numbers of competing factors that influence the design of each position.

- (1) Among the obvious factors are:
 - a. Full-time equivalent (FTE) limitations
 - b. Shifting mission of the supervisor’s program office
 - c. Priorities
- (2) Other factors include:
 - a. Innovations in work methods
 - b. Ratio of supervisors to staff
 - c. Use of deputies
 - d. Career opportunities
 - e. Moral impact of decisions
 - f. Training needs
 - g. Work environment

Designing a position or restricting a program office is a balancing act in which trade-offs are made. For example, while it may be economical to reduce grade levels, having the lowest possible salary costs may mean that the supervisor cannot attract and keep a capable workforce.

Good position management is the careful design of a position structure that blends the skills and assignments of employees with the goal of successfully carrying out the organization’s mission or program.

Good position management also requires consideration of grade levels for the positions involved. Grades should be commensurate with the work to accomplish the organization's mission and should not exceed those grades needed to do the work of the program office. A carefully designed position structure will result in reasonable and supportable grade levels.

Because supervisors and managers play major roles in the management and classification of employee positions, they are responsible for assuring a sound structure in the organization they lead that is not only efficient, but also cost conscious.

2-4. POSITION MANAGEMENT PLANNING

Managers and supervisors must consider the mission and organizational structure. The mission is the basis for all organizational and position decisions. In managing positions and structural problems, managers must make informed decisions about organizing the work. They must first recognize the problems that affect program office productivity. Examples of these considerations may include:

- (1) High employee turnover
- (2) Recruiting problems
- (3) Frequent disciplinary problems
- (4) High number of substandard products
- (5) Unmanageable backlog
- (6) Work environment

Once the problem is recognized, the manager/supervisor can take action to solve it. Attachment A entitled "Position Management Troubleshooting Guide" is designed with the intent to focus on many common position management problems.

2-5. Establishing Career Ladders

Establishing career ladder positions can optimize efficiency, productivity and organizational effectiveness by broadening the pool of applicants when filling vacant position; enhancing employee motivation and job satisfaction through planned employee development; reducing time to process promotions and administrative costs by providing noncompetitive advancement within the career; enhancing workforce retention by providing internal career opportunities; and lowering average human capital costs by including a range of pay levels. Career ladders are a useful tool when recruitment for the position is difficult at higher grade levels.

If a career ladder position is established and filled, it is recommended that supervisors and managers should:

- (1) Give employees increasingly difficult assignments and training to prepare them for the next higher grade.

- (2) Watch training progress continuously to enable next promotions on time.
- (3) Clearly communicate to employees the normal expected span of time between next promotions, especially if that time frame exceeds one year between grade levels.
- (4) Ensure funding plans accommodate next promotions of employees below the full performance level.
- (5) Promote employees who show the ability to successfully work at the next higher level of duties and responsibilities in the career ladder per the specific training agreement or collective bargaining agreements.
- (6) Give remedial support to employees who are not ready for promotion to enhance their performance and future success.

2-6. Implementation

While the Agency's organizational program offices take the lead, the Office of Human Resources (OHR) plays an essential supporting role in ensuring sound position management practices. OHR, agency managers and supervisors will work together to assure that:

- (1) Positions and organizations are structured following sound position management practices.
- (2) Each employee has a current and properly classified position description that adequately describes the work assigned.

Position Management Troubleshooting Guide

Symptom		Problem and Suggested Solutions	
<ul style="list-style-type: none"> ❖ Many Supervisors ❖ Employee Job Development limited ❖ Miscommunication or no communication between supervisors and employees ❖ Individual positions overspecialized 	and	<ul style="list-style-type: none"> Organization split into many small segments 	<p>Problem: Fragmentation</p> <p>Solutions: Combine related tasks and processes in the same organization under one supervisor, team leader, or other line authority. Ensure breadth of knowledge and tasks in individual positions to allow challenge, development of individuals.</p>
<ul style="list-style-type: none"> ❖ Difficulty in getting decisions made ❖ Management often unaware of why or how lower-level decisions are made ❖ Controversial issues sometimes do not reach upper-level supervisors ❖ Lower-level supervisors and employees overly restricted 	and	<ul style="list-style-type: none"> Too many Layers in the line of supervision 	<p>Problem: Layering</p> <p>Solution: Reduce number and layers of supervision, increase spans of control; increase authority that individual positions have to do their work; ensure clear lines of supervision and communication.</p>
<ul style="list-style-type: none"> ❖ Low employee morale ❖ Inefficiency ❖ High costs 	and	<ul style="list-style-type: none"> High-level duties spread thinly among several positions 	<p>Problem: Job dilution</p> <p>Solution: increase percentages or grade-controlling work in position; establish technician and support jobs to take care of lower-level work.</p>
<ul style="list-style-type: none"> ❖ High operating and salary costs ❖ Many layers in management chain ❖ Low employee morale 	and	<ul style="list-style-type: none"> Positions do not contribute largely to the mission of the unit 	<p>Problem: Unnecessary positions</p> <p>Solution: Eliminate positions that duplicate efforts. Determine what work is actually needed and design jobs around that work.</p>
<ul style="list-style-type: none"> ❖ Dead-end position ❖ Low employee morale 	and	<ul style="list-style-type: none"> No clear path or 	<p>Problem: Missing career ladders</p> <p>Solution: Establish bridge positions, including technicians,</p>

Symptom		Problem and Suggested Solutions
<ul style="list-style-type: none"> ❖ Recruitment problems ❖ Job dilution 		<p>progression to higher levels within an organization</p> <p>support staff at interim levels; create development programs, internships, etc., to move employees into higher-graded positions.</p>
<ul style="list-style-type: none"> ❖ More than one position with same responsibility ❖ Confusion on accountability 	and	<p>Workload and program changes not followed by position, organization changes</p> <p>Problem: Workforce and Position Description inconsistency</p> <p>Solution: Review organization's tasks and re-design positions; review and update all position descriptions; follow up with communication, accountability.</p>
<ul style="list-style-type: none"> ❖ Little employee initiative ❖ Eroding responsibility for quality ❖ Excessive overhead expense 	and	<p>More supervision than is actually needed to get the job done</p> <p>Problem: Narrow supervisor to employee ratio</p> <p>Solution: Increase span of control, introduce team concept, peer reviews, etc.</p>

DRAFT