

**From:** [Morris, Jeff](#)  
**To:** [OPPT ALL](#)  
**Subject:** Updated DRAFT OPPT reorganization proposal  
**Date:** Tuesday, April 24, 2018 12:10:21 PM  
**Attachments:** [DRAFT OPPT reorganization proposal 23 April 2018.pptx](#)

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Dear OPPT Colleagues,

On September 22, 2017, you were provided three straw proposals that were developed by the Senior Leadership Team to realign OPPT's organizational structure, in large part to support implementation of the 2016 amendments to TSCA. We appreciate the thoughtful and insightful input you provided during the initial comment period on the different proposals. Over 200 comments were received. Several themes emerged from the comments, with major themes being:

1. Ensure that TRI functions and activities continue to be performed at a high level by choosing an option that maintains its identity as an organizational unit at some level focused on and accountable for TRI and that provides a management champion who can represent the interests of that program.
2. Consider all the options for different branch structures for the Risk Assessment Division including options organized around program areas (e.g. new chemicals, existing chemicals); discipline (e.g. toxicology, exposure assessment, fate\chemistry); matrix approach (current structure); and assessment type (e.g. human health and environmental).
3. Consider how best to organize to ensure that chemical cases are effectively managed across the various divisions throughout the review process. Considerations include role clarification, appropriate skill alignment, improved cross organization communication, accountability and collaboration.
4. Create an organization that has the capacity to grow as the program matures, fees are collected and workload increases over time.
5. Several alternatives for different branch configurations were offered, such as integration of economists and risk managers, industrial chemists and risk assessors, and project managers and risk managers.

This input was considered in the development of the revised draft organizational structure being presented to you today. OPPT briefed senior leaders in OCSPP as well as the Agency's COO on this revised structure, on which we received positive feedback. The model presented today increases the number of divisions being proposed from five to six. This major change is centered on creating two science divisions that will provide assessments and other scientific support to the office. One will focus on conducting evaluations in support of the new chemicals program and the other will focus on risk evaluations for existing chemicals. This has been done in part to better align our science resources to our two core TSCA program areas in a way similar to the model we are using for risk management. This approach will also enhance senior management accountability in these two critical program areas. Another driver for this change was the significant growth anticipated in our science resources. We believe having two complementary science divisions for new chemicals and existing chemicals with senior executive ownership over two key processes in the office will assist in the accomplishment of these aspects of the office's mission. Considering the proposed creation of a

second science division and our efforts to conduct significant hiring in the near future, we plan to conduct a short survey within RAD to obtain input that will assist with planning for recruitment of scientists and engineers within the two new science divisions. This is not to be confused with the staff preference process which will occur soon across OPPT, on which we will provide additional details in the near future. In addition to renaming several other divisions and branches, other notable changes from the previously provided straws include:

1. Moving the Industrial Chemistry Branch to the New Chemicals Science Division;
2. Reducing the number of branches in the New Chemicals Management Division from 5 to 4 by combining the outreach, tracking and pre-notice consultation functions into a single branch and;
3. Increasing the number of branches in the Mission Operations Division from 5 to 6 by separating human capital management and the outreach/communications functions.

Although this draft proposal evolved in part from the feedback received to date, we recognize that there are some significant changes, so we are seeking additional input on how to best ensure a successful implementation of the new organizational structure. Specifically, we are seeking input on how to maximize collaboration and synergies between the two science divisions and ensure that the organization maintains maximum flexibility in both applying resources to critical needs and affording opportunities to have broad work experiences to promote staff development and enrichment. One key area in this regard will be enhancing RAD's current Technical Team approach by including discipline experts from both science divisions. We are seeking other ideas on ways we can promote flexibility and coordination between the two science divisions and across the office.

To accomplish this, there will be a two-week comment period starting on April 25<sup>th</sup> and ending on May 9<sup>th</sup>. The procedures we established during the initial comment period will be used again as the mechanism for submitting your ideas and suggestions. Comment boxes will be placed in rooms 3432, 4210, 5210 and 6208, and the anonymous email box, [OPPT.Change@epa.gov](mailto:OPPT.Change@epa.gov) will be reinstated.

I want you to know that I appreciate your engagement in this effort, as well as your continued work to protect human health and the environment through sound chemicals management.

All the best,

Jeff