

Making On-site Training Count

by Larry Freeman, PhD
The Shipley Group, *Senior Consultant*

For years, Shipley Group clients have talked to me prior to a scheduled on-site workshop. Besides discussing logistical details, they want a guarantee that attendees get training that is effective and project specific.

To address their concerns and objectives, I usually ask several questions, such as these:

- 1. How much NEPA experience will attendees bring to the workshop?**
- 2. What NEPA topics need special emphasis during the workshop?**
- 3. Are one or more local NEPA documents available for use during the workshop?**

Answers to these questions help a Shipley consultant tailor a workshop to attendees' needs. Such tailoring is especially important for on-site workshops, so that attendees from a single office or with similar NEPA tasks can share problems and discuss relevant projects.

Then a fourth question is important when the workshop is over:

- 4. Was the Shipley workshop effective and did it provide useful NEPA tools and skills?**

Shipley workshops are successful when they provide participants with real-world examples and with realistic answers to their questions. These real-world applications help guarantee that principles taught are immediately useful when participants work on their next NEPA compliance analysis.

On-site Shipley workshops are different from our open-enrollment workshops. In an open-enrollment workshop attendees might come from six or eight different agencies and a dozen or more work sites. As such, tailoring of the workshop topics is not possible ahead of time. Instead, the Shipley consultant presents general NEPA concepts and illustrates them by discussing stock examples.

An on-site workshop allows the consultant to tailor or customize workshop topics, as the initial three questions listed above suggest. So, for example, a Bureau of Land Management workshop in Wyoming might emphasize grazing projects if that is what most participants are working on. Attendees would discuss NEPA documents on BLM grazing decisions and strategies for preparing them in their local office.

The following text discusses all highlighted questions listed above. The first three deal with the Shipley tailoring of a NEPA workshop. The fourth question moves into the complex area of performance measurements of training success. As the No Child Left Behind law has shown, objective measurements of training success are difficult to prepare and their validity unclear.

1. How much NEPA experience will attendees bring to the workshop?

Compliance with the National Environmental Policy Act (NEPA) is a complex subject, so any presentation has to start by setting priorities as to what to cover and what to ignore. For example, attendees might be working on routine minor projects, ones most often documented by a categorical exclusion. In such cases, the Shipley consultant would spend little time discussing lead and cooperating agencies. For minor projects, agency NEPA folks usually don't need to be familiar with the legal roles of lead or cooperating agencies.

The more experience participants bring to the workshop, the more they will take away useful tools from the workshop. This past summer I facilitated a NEPA workshop attended by a half dozen university students. They already knew the basics of NEPA compliance, but they were unable to ask practical questions on NEPA compliance and the associated documents.

These students' lack of NEPA experience meant that they took away fewer useful strategies than they would have if they had had prior NEPA experience. Relevant learning most likely occurs when participants are able to link new concepts or strategies to their existing knowledge.

So, I always ask an on-site workshop coordinator about the NEPA experience that participants will bring to the workshop. I sometimes even recommend that they avoid filling a workshop with just newly hired NEPA workers. Generally such new hires need a few months of NEPA aging before they attend a Shipley workshop!

2. What NEPA topics need special emphasis during the workshop?

Most frequently, an agency contact person for a Shipley training workshop is a NEPA coordinator or a district manager/supervisor. Both have enough NEPA experience to identify topics or skills that would be beneficial for attendees to work on.

A variant of this second question is to ask if their recent NEPA work revealed any weaknesses in the compliance process. Or even more directly, did any of their recent NEPA documents have legal problems (either during an internal appeal process or perhaps in formal litigation)?

Legal weaknesses are the clearest link to possible topics for a training workshop. For example, if a recent NEPA Environmental Assessment failed to analyze a range of reasonable alternatives, then the training workshop should address this specific weakness. One or more of the workshop exercises would focus on the identification of reasonable alternatives.

Notice that these identified weaknesses are indirect quality criteria. So when agency representatives mention possible training topics, they are identifying criteria for judging the adequacy of a NEPA analysis and its associated documentation. These same criteria would be the basis for judging the success of the Shipley workshop.

Tailoring a workshop, therefore, means that the training topics are as project specific and as legally relevant as possible.

3. Are one or more local NEPA documents available for use during the workshop?

Real-world sample documents have always been the key to Shipley tailoring. Documents are especially important for a NEPA workshop. After all, successful NEPA compliance is essentially a documentation effort. The best analysis steps and effects analyses fail if they are not documented skillfully.

For example, the Ninth Circuit Appeals Court uses a comprehensibility standard in its decisions on NEPA compliance. This explicit standard means that NEPA documents must be clear enough so that the average federal employee (and members of the public) can understand what the potential impacts of a project are likely to be. And all identified impacts are clearly explained as to their potential significance.

Shipley consultants have routinely asked agency representatives to submit possible tailoring examples. In some instances, a representative will suggest that no recent documents are available. In such cases, the consultant will draw on one or several of the sample NEPA documents in the Shipley files.

So, most Shipley workshops deal directly with actual NEPA documents, not artificially constructed examples. Working with actual documents; gives participants experience with the many real-world questions that confront NEPA practitioners as they deal with complex compliance questions.

4. Was the Shipley workshop effective and did it provide useful NEPA tools and skills?

Success is difficult to measure. Yet, Shipley workshops routinely have repeat attendees, who attest to the value of prior workshops. They also often mention the value of one or more of the Shipley NEPA publications.

Such real-world evidence is the best argument for the success of Shipley workshops. At times, we have been asked for a test as an objective way of measuring our success. Our experience suggests that tests are not really effective in measuring the success of our workshops. In one instance we did prepare a written test of NEPA concepts covered in a Shipley workshop. Upon review of the test and its coverage of concepts, we decided that its focus was too narrow. A typical workshop covered many other topics and in much more detail than a brief test was able to address.

Our workshops do end by asking participants to fill out an evaluation sheet. The most important question on this evaluation sheet is this one: "Would you recommend this Shipley workshop to other NEPA practitioners in your agency or office?"

Conclusion: Training that Counts!

Shipley training counts. Our thousands of repeat customers are proof of our effectiveness.

Even back in the early 1980s, a regional NEPA coordinator said that he could tell when a field office had had a Shipley workshop. That office's next EA or EIS would then be *Shipleyized!*