UA/UAF Land Permitting Process Improvement Team (Land-It) Business Case
May 2016

Project Background and Purpose

This project focused on clarifying and streamlining the permitting process from a research and administrative perspectives including:

- analysis of the role/responsibility of the PI/researcher,
- the role/responsibility and steps to process a permit within the UA Land Office,
- and the role/responsibility and steps to process a permit within the UAF Environmental Health & Safety Office.

Approximately 100-200 permits are required for processing each field season; nearly 80-90% of these are UAF permit requests, the remainder are UAA/UAS.

Team Members

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Tina Schimschat, UA Land Management (UA Land)
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Emily Youcha, Institute of Northern Engineering
Jennifer Harris, Margo Griffith, Faye Gallant, UAF PIT Crew Facilitators

Brief Description of Problem

Researchers have been frustrated by the amount of time and oversight involved in applying for a land use permit. Delays can disrupt field schedules, delaying research projects, expenditures, and indirect cost recovery. As the university's budget shrinks, there are fewer resources available to spend on administrative processes. Administrative staff in UA Lands and UAF EHS&RM struggle to process permits quickly when information is missing; researchers often are not aware of resources and requirements for a complete permit application.

Recommendations

1. **UA Land will no longer hold a permit submission for any UAF internal risk review by or notification to EHS&RM.**

   UAF EHS&RM currently reviews all UAF permit applications, which delays the submission of applications to external agencies by UA Land. Restructure the UAF risk evaluation process, clarifying the difference between a risk review where action is needed vs. notification to UAF EHS&RM where no action is required (see Recommendation 6). Regardless of review, UA will no longer hold any permit application under review by UAF EHS&RM - the review/notification will occur in

parallel. If an application is deemed to be unallowable, the application can be retracted. Communicate process changes to PIs.

Responsible: UA Land & UAF EHS&RM
Implementation Time Frame: Summer 2016

2. **Invite State of Alaska and Bureau of Land Management to collaborate with UA in developing a cost and staffing needs reduction plan to service the permit processing needs of UAF and other UA research teams.**

   The Land It team evaluated the pros and cons of working with the State of Alaska and Bureau of Land Management to develop a permitting process, reducing the volume of individual permits required to be processed, consider those frequent projects that might warrant a blanket permitting approach. Given the tightening fiscal climate at both the university and state agencies, and the staffing issues BLM is experiencing all areas may benefit from reducing administrative work where possible. The pros and cons sheet is attached as Appendix A (see note2.s at bottom of sheet where similar permitting approaches have been done).

   Responsible: UA Chief Strategy, Planning and Budget Officer; UAF VC for Research
   Implementation Time Frame: Summer 2016

3. **Create a web searchable permit status log to improve transparency for PIs**

   The team has created a simple google tracking sheet that identifies the status of a permit through its major internal stages: "Incomplete- info requested from PI," "At agency," "Back from agency," "Legal review," and "Complication- see notes." Entering the information is a simple step that should take less than one minute per permit, keyed by UA Lands. The google sheet can be easily linked on the website so that PIs can check the status of their permits quickly and without needing to call or email, and using this approach will automatically display the most recent version of the log.

   Responsible: UA Land Staff
   Implementation Time Frame: Summer 2016

4. **Update website and/or create internal UA webpage that can be managed by UA Land and with greater functionality for permit processing**

   The UA Land website is currently hosted by an external party/vendor, primarily for the management of University of Alaska lands. UA Land would benefit from an internal site or pages that can be linked to UA internal forms and tracking sheets for improved process management. Land It recommends UA Land/OIT create an internal website/pages dedicated to land permit processing. This webpage needs to be updated to include improved training resources, the updated checklist/intake form,

and the searchable status log. Currently information on land permits are spread across several UA and UAF websites (e.g. UAF Office of Research Integrity, Toolik Field Station). This information should be consolidated and maintained by UA Land in collaboration with UAF stakeholders.

Responsible: UA Land Staff
Implementation Time Frame: Summer 2016

5. **Training and education**

The Land It team identified improving training and resources for researchers as a key need for improving the process. They highlighted particular areas where researchers would like more information about requirements and processes, attached in Appendix B. A defined owner for these trainings, likely UA Land, should be identified to ensure development and delivery. Electronic resources/guidance should be posted to the improved website.

Responsible: UA Land Staff/UAF EHS&RM/Institute Director/UA General Counsel/UA Risk Services
Implementation Time Frame: Summer/Fall 2016

6. **Revise criteria for UAF risk review - develop matrix/decision tree resources to aid PIs in understanding when a permit requires review**

The team identified the UAF risk review step as a complication that caused delays and confusion among researchers, UA Lands, and UAF. This is driven by the timing of the risk review step, as well as the scope of the review. The team recommends that the risk review step happens in parallel with the submission to the agency, rather than before. The team also recommends that this step be entirely internal to UAF to avoid unnecessary touch-points in the process. Finally, the team recommends redefining the scope of risk review, limiting this step to those activities that represent risk to the university, and clarifying where this step is purely informational (Appendix C).

UAF EHS&RM will use a "trust but verify" approach to ensuring permits are submitted for risk/environmental review, with an audit process. If submission is not occurring, the process may be adjusted.

Responsible: UAF EHS&RM and PIT Crew
Implementation Time Frame: Summer 2016

7. **Update checklist/intake form utilizing electronic workflows**

The team created an updated and comprehensive checklist for PIs and research staff to utilize. An electronic routing/signature form (Docusign PowerForm) (Appendix D) was created to electronically obtain Dean/Director approval and route the request

form to UA Land - this new form should be fully implemented on the new UA Land website/page. The change must be communicated to PIs. The updated process ensures all questions and information (that can only be provided by the PI) are captured at the intake stage with a high degree of accuracy and reduces back-and-forth routing. The updated process ensures a complete application is submitted from the beginning with all internal reviews completed prior to UA Land receives the application.

Responsible: UA Land Staff and PIT Crew
Implementation Time Frame: Summer 2016

8. **Staff/create an expert resource Permitting Coordinator position - consider where this should be best located (at UA or at UAF)**

   The permitting process requires timely and accurate execution for university sponsored activities or projects to start on-time and be completed within the funded period of performance. A permitting expert must assist in preparing permits and amendments to ensure complete and correct applications. Experts can identify opportunities for permit consolidation by agency and develop a filing system for all applications and permits. Appendix E outlines the basic skills and responsibilities needed.

   Responsible: TBD, depending on where resource is located (UA or UAF)
   Implementation Time Frame: Revisit necessity following implementation of other recommendations

9. **Flag land permitting requirements on pre-award routing form, harmonize with post-award staff**

   Create a "trigger" mechanism or check-box listed on the proposal routing form. Once awarded, the notification from OGCA to the PI/Unit will include a reminder task outlining the land permitting process. Pre-scoping meetings ("harmonization" meetings) were identified as a proactive approach as well to ensure unit personnel, researchers and administration are coalesced when a land permit is identified in the award documentation. Often grants and contracts are signed very last minute and proactively scheduling this level of communication will ensure a smooth and successful application approval.

   Responsible: UA Land/UAF OGCA with communication to VCR's Office/Units
   Implementation Time Frame: In process

Current Process

Major areas of inefficiency or "rubs" the Land IT team is working to reduce or eliminate in the improved process:

1. Time delay and lags between UAF Risk & UA Land and between UA Land & agencies
    a. Impact: Impediment to conduct research/field work in a timely manner, or conduct the work without an approved permit
2. Incorrect or incomplete information provided on permit application
    a. Impact: time delays and increased
3. Training and resources needed in permitting
    a. Impact: There are currently multiple reviews of the same application
4. Liability of risks (monetary, political, environmental and reputation)
    a. Impact: Risk elements are not identified at the beginning of the process and institutionally we do not define/communicate expectations for acceptable risk. Review should not be a uniform risk assessment.
5. Budget and staffing constraints in UA Land office during high permitting times
    a. Impact: Reduced resources to assist and guide the permitting process.
6. Best practices needed
    a. Impact: Faculty acknowledge that other universities and peer institutions "do it better" with less cumbersome processes. UA has a wide variety of the types and complexities of permitting needs. Use of automation could add efficiency/transparency. Blanket permitting or processes to handle repeat applications may be useful.
7. Harmonization with post-award needed
    a. Impact: Awards may be signed just as field work is starting. We are caught 'flat footed' and unable to respond quickly to researcher needs.
8. Transparency/communication and Faculty/PI permit expert resource needed
    a. Impact: The current message from SW Land is perceived to be "Talk to me when you have X, Y, Z ready," not "Let me help you get X, Y, Z ready." Faculty are unaware of the applications status as it moves through the process after initial submission. Faculty need a permit specialist or resource to help ensure forms are completed properly - where this resource should be located should be considered.
9. Confusion surrounding 'who' approves: UA Land vs. UAF Risk vs. Landowner
    Impact: Perception that unnecessary internal reviews occur/take valuable field season time away from research, or reviews that add no value. Many faculty do not know when a permit is required, what is involved, who is responsible and get conflicting internal information after a landowner may have provided approval.

Conclusion

The team's recommendations address the primary concerns or "rubs" in the current process. By streamlining the intake process, clarifying needed information, and separating the UAF EHS&RM review from the UA Lands permit processing, we foresee a faster, more transparent process that ensures reasonable oversight.

Many of the team's recommendations can be implemented immediately, with support from the steering committee.

Appendixes

Appendix A- Blanket Permit Pros and Cons

Appendix B – Training Needs
Appendix C – Risk Review Decision Tree
Appendix D – Intake Form and Checklist
Appendix E – Permit Coordinator Position

APPENDIX A: BLANKET PERMITS	
Blanket Permit - One UAF department with multiple researchers all with different scopes of work contained on one permit issued by one property owner for one location.	
PROS	**CONS**
One permit for multiple users. (If they are working in the same area, with similar activity and shared resources)	Multiple users with different scopes of work - complex tracking issues
May be more cost effective?	Various term dates or project duration - complex tracking issues
Onetime approval processing time. More efficient for researchers than multiple permits.	Adding more research projects or changing researcher using that site - would require amending the permit. BLM permit language "There shall be no additions to this site without written approval of the authorized officer." "Only the person listed on the permit is authorized to use the permit." "This permit may not be assigned without prior approval of the authorized office of the Bureau of Land Management." MAY NOT BE NEGOTIABLE
Consolidation allows for easier tracking within the University department?	Removing completed research site - would require amending the permit (for each individual site). BLM "All equipment used in this project must be removed from the public lands within 30 days of expiration of this authorization." DNR "The site shall be restored to a condition acceptable to the Authorized Officer."
	Reports due for all or some of the research projects. Most will have completion reports. No change or benefit of Land Management.
	Researcher not providing required reports or removing their site - the permit now is in default and can be terminated.
	Permits are revocable. DNR permit language "This authorization is revocable immediately upon violation of any of its terms, conditions, stipulations, nonpayment of fees, or upon failure to comply with any other applicable laws, status and regulations (federal and state)." BLM "It is revocable at the discretion of the BLM, at any time upon notice."
	How do we know if a new site/researcher is "using" the site?
	Each project can have different stipulations or terms and conditions. It all depends on what the scope of work is and the duration/term of work - complex tracking issues

	BLM is not charging UA the fees it could. This could very well change that and end up costing the University much more in fees. The fees are paid by the departments.
	Could damage working relationship between the University, DNR & BLM
	BLM is not receptive to Blanket Permits.
	DNR is not receptive to Blanket Permits.
UPDATED 2-18-2016 DES MAA	

UA Land and DNR have several permits with sites throughout the DNR Region on one permit. The permit is for the same or similar activities within the same Region (examples: 1) Met Stations & Repeaters Sites are combined 2) boreholes for permafrost studies are combined when possible to one permit 3) seismic sites).

BLM is in the process of issuing a permit that will authorize the access, data collection and monitoring of over 50 boreholes on one permit. This will eliminate several permits with single sites on them.

The permit examples above do not encompass the full scope that UAF researchers would like, but it is a step in that direction and one that BLM and DNR is willing to take. **Not all DNR Regions or BLM offices permit the same way. It would be a major help if DNR and BLM state wide would be consistent in their process, it would improve the speed and efficiency of the process.**

APPENDIX B: TOPICS FOR TRAINING/EDUCATION LAND-USE PERMIT

Training/Education

- What sorts of activities need permitting
- Potential consequences for not having a permit
- UA vs. UAF responsibilities
- Timelines for Permit Processing

Associated Topics

- UAF Risk Related
  - Environmental Permitting/Responsibilities
  - Risk Reviews
  - HazMat Shipping
  - UA Land Management Related
    - Required information to submit a complete permit packet.
    - Property Owner(s)
    - Legal Description
    - Site Map
    - Project Description
    - Project Duration (term)
    - UAF Internal Reviews

Associated Tools

- Flow Chart depicting Permit Process
- FAQs
- Contacts for Questions
- Guidance Documents

AUDIENCE

- Faculty
- New Faculty
- Graduate Students
- Post Docs

METHOD OF DELIVERY

Website containing all of the information and tools

- Have UAF Departments Link to SW Lands

E-Mail from Department Head

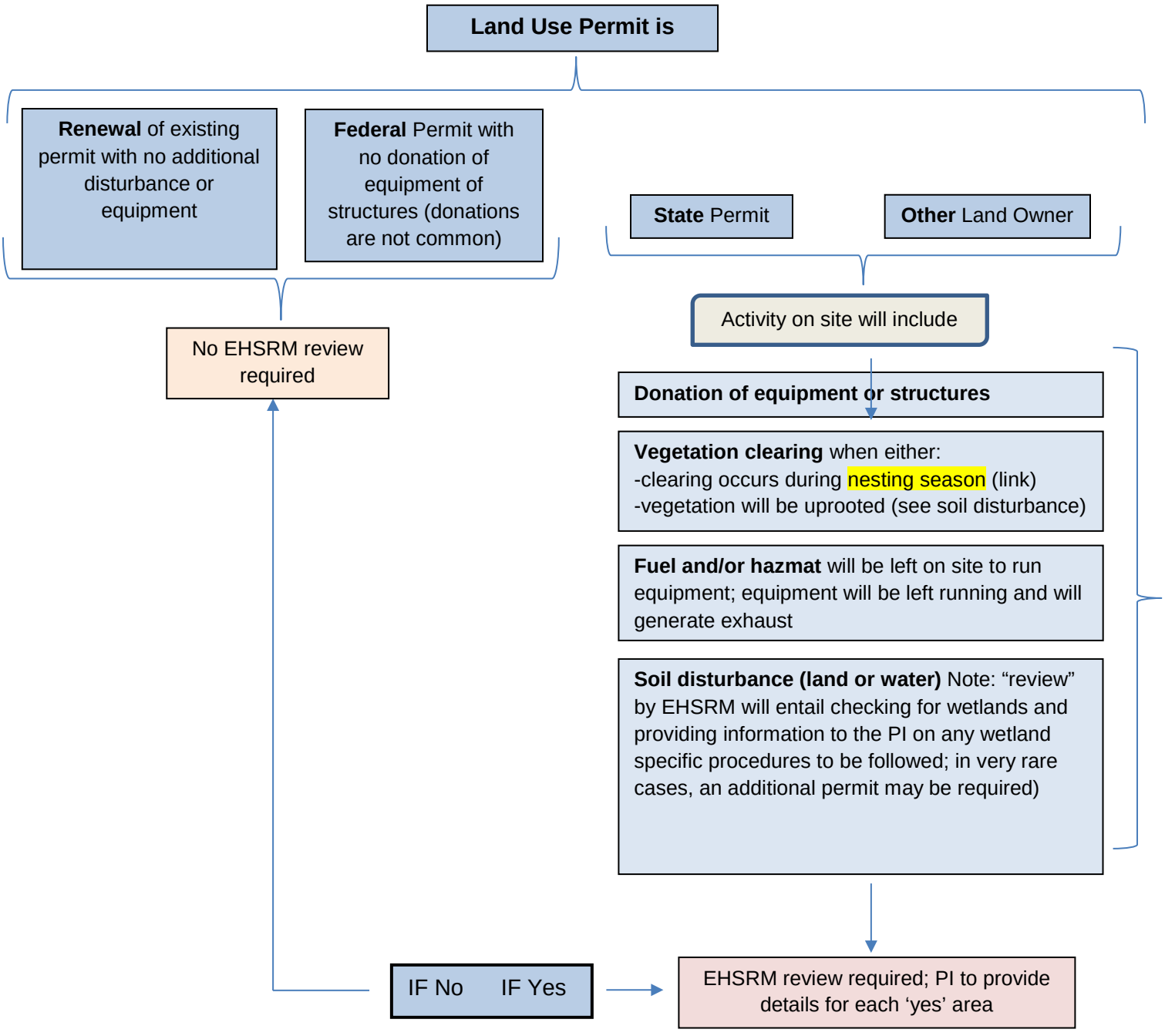
- E-Mail would have the "why should I care about this statement"
- Attachment would include the tools listed above as well as any additional developed and a link to the website.
- Timeframe for Delivery - November and February annually

In-person

- Department training (road show)
- New Faculty Orientation
- Grad Student Orientation

APPENDIX C: UAF RISK REVIEW DECISION TREE

The UAF EHSRM (Risk) review of land use permits will occur in tandem with the permit application process; the PI will contact UAF EHSRM when they apply for a land use permit based on the following chart. A final copy of the land use permit application will be filed at EHSRM for awareness of potential contaminants (such as batteries) which do not require specific review. Please feel free to contact us with any questions at 474-5487.



APPENDIX D: UA LAND INTAKE FORM/CHECKLIST/AUTHORIZATION

The team updated the UA Land permit checklist to include an authorization for permit fees and the fund/org to charge, and turned the form into a DocuSign Powerform that can be filled out and routed electronically. The form is currently available at: https://www.docusign.net/Member/PowerFormSigning.aspx?PowerFormId=cbf1d1a2-25cf-4e16-9f05-89876c11b6fd

The next step will be rolling out the form and posting it to the UA Land website.

APPENDIX E: PERMIT COORDINATOR or MANAGER

Grade 78 Exempt position

Permitting requires timely and accurate execution in order for university sponsored activities or projects to start on-time and be completed within the funded period of performance. Land use permitting granting access to private or government controlled lands is a required compliance part of activates or projects. The permit manager will assist in preparing permits and amendments to ensure complete and correct applications. The permit manager will determine opportunities for permit consolidation per agency. Manager will develop a filing system for all applications and permits; develop a computer-based system for permit tracking/reporting and enter permit information into a database. The manager will monitor performance of permits for compliance of permit conditions; receive and compile post-activity reports, prepare work products and deliverables. Work is performed under administrative supervision of the Director of EHS&RM. The manager will work with university students, staff, faculty, private land owners and governmental agency representatives.

Knowledge: University rules and regulations, policies and procedures; applicable Local, State, Federal laws, rules, regulations and policies with relation to land use permitting and environmental impacts and permitting requirements. Knowledge of English grammar, sentence structure, abbreviations, spelling, capitalization, punctuation and word usage; and working knowledge of computers and software programs for development of databases. Ability to interpret and apply complex polices, rules, and regulations.

Skills/Abilities: Ability to research, interpret, correlate, evaluate, and analyze rules and regulations and develop sound conclusions to ensure the activity/project is in compliance. Ability to determine which research activities and projects require permits. Possess excellent written and oral communication skills; effective public speaking and presentation skills. Ability/skill to produce accurate and complete permit applications and final permit reports. Proficiency in Microsoft Word, Excel, PowerPoint, and Filemaker Pro, or equivalent software.

Understand and carry out verbal and written instructions; work independently through all phases of a permit process including preparation of final reports; demonstrate initiative; prioritize tasks to meet set deadlines; and generate reports in accordance with permit stipulations. Work cooperatively and communicate effectively with other staff members, representatives from other government agencies and organizations, stakeholders, private land owners.

Experience: One year of progressively responsible work experience involving permits. Experience related to working effectively with regulatory/permit agencies. Experience in preparing clear and well organized reports, representing your organization to agencies, facilitating multiple individuals and/or organizations applying for consolidated permit.

Education: Bachelor's degree in science or other related field, and one year progressively responsible relevant experience (i.e. government permitting agency), or an equivalent combination of training and experience.