

<u>February 22, 2021</u> <u>SECY-21-0018</u>

FOR: The Commissioners

FROM: Margaret M. Doane

Executive Director for Operations

SUBJECT: UPDATE ON AGENCYWIDE TRANSFORMATION PERFORMANCE

MEASURES

PURPOSE:

The purpose of this paper is to provide the Commission with an update on the lessons learned from implementation of Objectives and Key Results (OKRs) in 2020 and new agency OKRs for 2021. This is forwarded in accordance with the agency transformation performance measurement methodology set forth in SECY-20-0049, "Agencywide Transformation Performance Measures," dated May 29, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20149K586). The paper does not address any new commitments or resource implications.

SUMMARY:

"Transformation" refers to the collection of activities that are advancing the U.S. Nuclear Regulatory Commission (NRC) towards the vision of becoming a modern, risk-informed regulator. The transformation is a multi-year journey. In 2019, staff gathered information and ideas, such as through the NRC Futures Jam, to formulate a common vision and goals for transformation. The NRC's transformation vision is oriented around four focus areas: 1) being "risk smart," 2) attracting and retaining staff, 3) innovation, and 4) effectively using new technology to work smarter. The staff identified the need for a broad set of new tools and

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resources that would provide the capability to perform its work in different and better ways. The development and familiarization of staff with these new tools and resources was the priority for 2020. In 2021, the staff will continue to integrate these tools and resources into routine agency work processes, anticipating that these will provide long-term and sustainable value.

In 2020, as discussed in SECY-20-0049, the NRC staff selected OKR methodology to assess and evaluate the progress of the NRC's transformation. OKRs, as implemented by the NRC, correlate to annual goals and thus define what the staff determines to be success in a given year. Because the development of transformation-enabling tools and resources was the principal task in 2020, the agency OKRs were largely oriented to drive actions and measure progress towards this outcome, such as by tracking project milestones. In 2021, the focus is on widespread application of these tools and resources across the agency, and the OKRs for this year are reformulated to reflect this aspiration. The measures of progress are different than they were in 2020, and center on indicators of adoption and usage.

This paper provides the evaluation of the agency's transformation progress so far, as measured by the 2020 OKRs (presented in detail in Enclosure 1), and sets forth this year's goals for transformation via the 2021 OKRs (presented in detail in Enclosure 2). The approach for the analysis of the 2020 OKRs follows the Agency 2021 – 2022 Interim Learning Agenda (ADAMS Accession No. ML20254A007), pursuant to the Evidence-Based Policymaking Act of 2018. As directed by the Interim Learning Agenda, the evaluation addresses whether OKRs are driving progress towards achieving aspirational, transformation-related goals, as well as the efficacy of the agency's implementation of OKRs as a performance measurement methodology.

Consistent with the primary goals for the year, the evaluation indicates that the use of OKRs contributed to meaningful progress in developing and building staff familiarity with transformation-enabling tools and resources within all four transformation focus areas in 2020. These included, within the risk focus area, the Be riskSMART decision-making framework; within the innovation focus area, the IdeaScale innovation platform; and within the people focus area, the Career Enhancement tool. Progress in the technology focus area was rapidly accelerated in 2020, as evidenced by widespread adoption of Office 365 and other collaborative work tools while over 90% of employees were working remotely during the Coronavirus Disease 2019 (COVID-19) public health emergency. By making use of these capabilities, the staff completed mission-critical work within the desired timeframe. Overlaying these efforts are the actions the staff is taking to improve elements of the agency culture that will lead to a greater acceptance and appetite for change. Additional examples of use and adoption of these transformative tools and resources in 2020 are included in Enclosure 1. The 2021 OKRs will drive the broader adoption and application of these tools and resources throughout the organization.

BACKGROUND:

The NRC's motivation for transformation is borne out of the increasing awareness that, while they have served the agency well, many of the practices used to accomplish the agency's safety, security, and environmental mission were based on 21st century technology. More modern, state-of-the art methodologies and approaches can be applied to accomplish the work of the agency more effectively and efficiently. For example, as the regulated community adopts new technologies, such as advanced reactor design concepts, the agency has identified opportunities for improvement. Moreover, the COVID-19 public health emergency brought to light the importance of adaptability and agility in confronting rapidly evolving challenges.

The starting point for the agency's transformation effort can be tied to a scenario-based assessment of what the future external environment, within which the NRC would carry out its mission, might look like through 2030 and beyond. This was documented in "The Dynamic Futures for NRC Mission Areas" (ADAMS Accession No. ML19022A178), also referred to as the Futures Assessment. Using this report, which included discussion of potential future workload scenarios, the staff held an all-agency "Futures Jam" in June 2019. The Futures Jam was a 3-day virtual discussion with NRC staff and management. All staff was encouraged to join the conversation and identify areas where the agency should focus its transformation activities to be successful in any potential future scenario.

The information gathered from both the Futures Assessment and the Futures Jam brought to light the need for a broad set of new tools and resources that would enable transformation of the agency's processes and approaches. On October 29, 2019, staff provided a briefing to the Commission entitled, "Transformation at the NRC – Becoming a Modern, Risk-Informed Regulator." In that briefing, the staff informed the Commission that this work would be organized around four focus areas:

- Be riskSMART making sound decisions while accepting well-managed risks in decision-making.
- Focus on our People maintaining an engaged and highly skilled workforce now and in the future.
- Innovation being innovators who making timely decisions that take into account different viewpoints and fully explored options.
- Use Technology using technology to work smarter, including using data analytics to highlight areas for regulatory attention and improvement.

The focus areas were supported by agencywide initiatives to put in place the transformation-enabling tools and resources. Those were led by Transformation Initiative Teams comprised of representatives from NRC headquarters and the regional offices. The project schedules for the Transformation Initiative Teams were established in what is referred to as the Transformation Roadmap, with a starting point in late 2019. Most of the Initiative Teams were tasked with completing the development of their respective tools and resources before the end of calendar year 2020, and building staff familiarity through strategic outreach and communication. The widespread deployment and integration of the tools and resources into routine work processes will continue in 2021.

The activities of the Transformation Initiative Teams complement work already underway or planned at the office level. In 2020, each of the Executive Director for Operations (EDO) offices put in place an Office Transformation Plan. These plans included innovative approaches to address challenges and improve work processes specific to those offices, ways to encourage staff to use the tools and resources developed by the Transformation Initiative Teams, and strategies to foster an office culture that would embrace change and support further innovation.

In Staff Requirements Memorandum M191029, "Staff Requirements Memorandum – Briefing on Transformation at the NRC – Becoming a Modern, Risk-Informed Regulator," (ADAMS Accession No. ML19324G270), dated November 20, 2019, the Commission directed the staff to provide it with information on transformation-related performance measures. Performance measurement, in this context, refers to a framework for defining goals and coherently assessing the progress towards meeting those goals. The staff stated in SECY-20-0049 that OKRs would

Office of the EDO (OEDO).

be used for this purpose. In the OKR methodology, as described in SECY-20-0049, the "Objective" is a statement of what the organization wants to achieve. These are intentionally aspirational, and may be referred to as stretch goals. That is, the goals reflected in the Objectives go beyond what is routine for the organization. The "Key Results" (KRs) are the criteria that tell the organization whether that objective has been accomplished. In keeping with stretch goals, the organization should be sufficiently ambitious that the accomplishment of all of the KRs is not assured. The OKR approach has been applied to guide transformation in modern, high-performing organizations, including Google, the Gates Foundation, and TED, and the approach is becoming more popular in the public sector.

In the framework implemented by the staff, OKRs that represent agencywide goals or aspirations are established by the EDO with the support of the Transformation Steering Committee.¹ Those OKRs become the basis for determining the actions that the EDO offices, regions, and Transformation Initiative Teams will do to support the agencywide transformation goals. Each office and Transformation Initiative Team then formulates their own organization-specific OKRs that support the agencywide OKRs. This manner of cascading OKRs facilitates alignment of the vision for transformation across the agency and ensures that staff are working towards a common purpose.

OKRs are intended to be time-bound, both to motivate near-term action and in recognition of the fact that an organization's goals evolve in response to internal and external drivers. The NRC has adopted an annual cycle, wherein the EDO establishes the agencywide OKRs at the beginning of the calendar year, evaluates the progress at the end of the year, and then re-formulates the OKRs for the following year based on new goals and priorities. The OKRs may be revised or updated in response to changing circumstances during the prior year. The office-level and Transformation Initiative Team OKRs are aligned with those at the agencylevel and will also be revised at the same frequency.

As transformation performance measures, OKRs are complementary to, and aligned with, the NRC's Strategic Plan. The Strategic Plan defines "goals" as those results that the agency must achieve to carry out its mission successfully. In NUREG-1614, Volume 7, "Strategic Plan: Fiscal Years 2018 – 2022," (ADAMS Accession No. ML18032A561), the NRC has one safety and one security goal, each being supported by "objectives," which are the outcomes the agency is trying to achieve, and "strategies" to accomplish the objectives. The appropriate consideration of risk in decision-making is emphasized throughout the Strategic Plan as a strategy to support the safety- and security-related objectives and goals, consistent with the intent of the "Be riskSMART" focus area. Moreover, the Strategic Plan speaks to continuous improvement of agency activities and processes, as well as the commitment to innovation in its regulatory activities, as supported by the "Innovation" and "Use Technology" transformation focus areas. Finally, the Strategic Plan states that recruiting, hiring, training, motivating, and retaining staff is critical to the agency meeting its strategic goals, in line with the "Focus on our People" transformation focus area. The NRC's Strategic Plan for the years 2022 – 2026 is currently under development, and synergies between that plan and the OKRs will continue to inform assessments of the NRC's progress in meeting mission execution and transformation-related goals.

¹ The Transformation Steering Committee provides ongoing strategic oversight of agency transformation activities. In addition to the EDO, the Transformation Steering Committee is made up of the Deputy EDOs, the Director of the Office of Nuclear Reactor Regulation, the Chief Human Capital Officer, the Chief Information Officer, and the Team Leader for the Transformation Core Team, who resides in the

DISCUSSION:

2020 Agency OKRs

In line with the vision of becoming a modern, risk-informed regulator, the EDO established the following agencywide objective for 2020:

Empower every employee to use innovation to make timely and better-quality decisions to promote safety, security, and protect the environment. This Objective had three KRs:

- **KR 1**: Deliver impactful solutions that meet the near-term goals identified in the Transformation Roadmap and the fiscal year 2020 Office Transformation Plans by September 30, 2020.
- **KR 2**: Free staff time to support better quality and more timely decision-making by each office improving at least three processes, either programmatic or corporate.
- **KR 3**: Improve employee engagement and demonstrate it by improving our overall Federal Employee Viewpoint Survey (FEVS) employee engagement score to 80 percent, the highest score ever achieved by the NRC. (Multiyear stretch goal)

Offices and Transformation Initiative Teams determined the goals they would need to meet in order to accomplish these KRs, and then formulated their own OKRs to measure their performance.

As discussed above, these OKRs reflect that a primary focus for 2020 was to develop and build staff familiarity with new transformation-enabling tools and resources. The development of these tools and resources is the near-term goal given in KR1, with reference to the Transformation Roadmap. Transformation Initiative Teams collaborated with offices, as part of the 2020 Office Transformation Plans, to build staff familiarity through outreach, communication, and training. The agency's work processes have a direct bearing on the quality and timeliness of decision-making, and the tools and resources created in 2020 will enable continued and sustainable improvements in these various processes in 2021. In 2020, KR2 drove office-specific improvements to some programmatic and corporate processes to start to realize the efficiency gains needed to allocate resources to matters that are most important to accomplishing the agency's mission. KR3 was established as a necessary corollary to realize the goals of KR1 and KR2. An organization with high employee engagement is one in which the staff know the organizational goals and priorities, understand how their work supports the accomplishment of those goals, and where trust is extended across the organization. A high level of employee engagement is critical to fostering an agency environment where innovative ideas are accepted, and meaningful change is possible.

OKR Evaluation Approach

In determining the approach to analyze the agency's transformation progress using the OKRs, the staff made reference to the Agency 2021 – 2022 Interim Learning Agenda, pursuant to the Evidence-Based Policymaking Act of 2018. Interim Learning Agenda Priority Question (3) asks:

Will the adoption of Objectives and Key Results be an effective method for the NRC to strive for aspirational goals?

The Interim Learning Agenda directs that, in answering this question, the NRC should perform an evaluation with three elements, each of which is addressed in this paper. First, the evaluation should determine whether the OKRs have effectively moved the NRC toward achieving its aspirational goals. For the manner in which OKRs were implemented by the NRC, this evaluation analyzes the progress made for each of the NRC's three KRs, with particular attention given to activities that will lead to meaningful and durable improvements in the timeliness and quality of decision-making. Second, the Interim Learning Agenda directs that the evaluation also addresses whether the agency established an effective program for the implementation of OKRs as a performance measurement methodology. This inquiry reflects upon the extent to which the staff have reached a shared understanding of the principles and best practices of OKRs, as well as whether the staff have established sustainable processes for the ongoing tracking and reporting OKRs. Third, the evaluation should assess whether OKRs should continue to be used as a framework for achieving aspirational goals.

Results of OKR Evaluation for 2020

The detailed evaluation of the agency's transformation progress using OKRs is found in Enclosure 1 and is summarized here.

Have OKRs effectively moved the NRC toward achieving its aspirational goals?

The agency's aspirational goal, as defined by the transformation vision, is to become a modern, risk-informed regulator. OKRs effectively move NRC towards this goal if their application specifically drives actions or supports decision-making to achieve this end. The OKRs specify, through the KRs, what will be necessary for the organization to measure to determine whether its transformation is successful for that time period. These measures then drive transformation as the organization structures its actions to meet the standard for success. The OKRs improve decision-making by orienting staff across the agency towards common outcomes and by highlighting what is working well that can be leveraged for further gains, as well as areas where focused attention is needed to address challenges.

The effectiveness of OKRs is evident in the assessment of each of the agency's three KRs in 2020. With respect to the Transformation Roadmap, the actions driven by KR1 were those necessary to meet the goals for completing the development of transformation-enabling tools and resources, such as by ensuring that Transformation Initiative Teams were provided sufficient resources (including staff) and that they were given support by management to try new approaches. Similar strategies were employed to implement office-level solutions in the Office Transformation Plans. The agency was largely successful in 2020 in each of the four transformation focus areas. Major milestones completed in 2020 included, within the risk focus area, the Be riskSMART decision-making framework; within the innovation focus area, the IdeaScale innovation platform; and within the people focus area, the Career Enhancement tool. Work in the technology focus area was rapidly accelerated this year to motivate the use of Office 365 and other collaborative work tools, while over 90% of employees were working remotely during the COVID-19 public health emergency. Additional examples of tools and resources established through KR1 are described in Enclosure 1.

The execution of Office Transformation Plans, as referenced in Agency KR1, significantly overlaps with Agency KR2, which addresses the implementation of office-level process improvements. The actions driven by KR2 were those necessary to put those process improvements in place, such as by building staff familiarity with new tools and resources.

For instance, each office encouraged its staff to use the IdeaScale platform as a replacement for the previous office-specific innovation hubs, and there have already been several successful Challenge Campaigns to crowdsource solutions, including five in 2020. Offices also showed that the use of Office 365 improves the process for collaboration on complex work products. It is now easier to make comments and edits, as well as to track changes through various file versions, including when the staff are not co-located. For example, in 2020 the staff completed the Final Safety Evaluation Report for the NuScale small modular reactor on the agency's original 42-month technical review schedule, while most staff were working remotely. In addition to using Office 365 for collaborative work, the Expert Evaluation Team on gas transmission lines near the Indian Point Nuclear Power Plant used Open Opportunities as an improved process to match technical support to the project, while also providing staff with a career development opportunity. Additional examples of office-level innovations and improvements are described in Enclosure 1.

The measure for agency KR3 is the FEVS Employee Engagement Index (EEI) score. Employee engagement refers, broadly, to staff's perceptions of the organization's leadership, their supervisor, and their work experience. An organization with high employee engagement is one in which staff know the organizational goals and priorities, understand how their work supports the accomplishment of those goals, and where trust is extended between peers, as well as between staff and management. This sort of engagement is critical to fostering an agency environment where innovative ideas are accepted, and meaningful change is possible. The actions driven by KR3 were those necessary to identify and address elements of the agency culture that could have negative implications for employee engagement. The NRC staff was surveyed in 2020 to identify gaps between the agency's current culture and its desired culture. Considering the results of that survey, the agency formulated a multi-year Culture Improvement Plan, to begin in 2021, centered on changing behaviors and processes, such as the ways that management communicates with staff and the ways that employees are recognized for embracing change. Some actions will be coordinated at the agency-level while others will be tailored to specific office needs. The agency recently received the results of the FEVS administered in 2020, and the EEI score increased compared to the FEVS administered in 2019.² This was consistent with achieving the multi-year stretch goal of 80%. The staff will use insights from the FEVS to further guide and refine its Culture Improvement Plan.

Was the methodology employed within the agency an effective program to implement the use of OKRs?

In 2020, the NRC focused on three elements of OKR implementation. Collectively, these maximized the effectiveness of the program, as is evident from the progress made during the year. First, the staff clearly delineated the roles and responsibilities of involved parties to streamline decision-making processes. The EDO formulated the agency-level OKRs. Transformation Initiative Teams and offices were given latitude to develop their own that supported the agency-level OKRs without intervention. Second, staff strove for consistency in the formulation of Objective statements and KRs among Transformation Initiative Teams and offices to more readily allow for comparisons of progress across the organization. Opportunities for improvement in this area became apparent during the year, such as to more clearly specify the expected measures and intended timeframes for accomplishing the KRs. Lessons learned will be applied to OKRs in 2021. Third, the staff developed mechanisms for tracking and reporting OKRs. OEDO directed that offices and Transformation Initiative Teams provide progress updates on their OKRs on a quarterly basis for discussion at Quarterly Performance

² The full results of the 2020 FEVS will transmitted to the Commission in a separate correspondence.

Review (QPR) meetings. OKR status is documented on an internal web-based dashboard³ that is visible to all staff and which was used at QPR meetings beginning in Quarter 2 of 2020.

Will the agency continue to use OKRs as a method of achieving aspirational goals?

OKRs and the agency's performance management framework, as described in Management Directive(MD) 6.9, "Performance Management," represent two different approaches to goal-setting and performance management. It is, at present, appropriate for the NRC to use the two approaches in parallel. While the transformation focus areas are aligned with the Strategic Plan, the sort of performance indicators described in MD 6.9 are not suited to assess transformation progress. Particularly, those performance indicators are the reference to determine whether the NRC is accomplishing its safety and security goals and serve as the baseline to measure successful mission execution. They do not, however, indicate whether there is a need or opportunity to improve the practices and processes by which the NRC accomplishes those goals. OKRs provide a suitable methodology for assessing changes in how the agency is accomplishing its safety and security goals, and notably, the degree to which innovative approaches are being adopted to improve the quality and timeliness of decision-making. OKRs are, necessarily, more aspirational than the agency's performance indicators. They represent challenges for which there may not yet be a defined solution, or for which the solution, if known, would require unusual or extraordinary staff effort to accomplish.

The NRC's transformation involves new tools or resources, and it is anticipated that these will be integrated into routine office work processes. At such time, they will be reflected in the agency's baseline mission execution and would be within the scope of the performance indicators. For instance, because they now have widespread adoption, performance indicators that concern the timeliness of executing work processes should reflect the advantages gained from using collaborative tools in Office 365. Further, although there is still progress to be made in the use of data analytics and process automation (as described in our 2021 OKRs), some analytical and data visualization tools provided through the Mission Analytics Portal have already provided better monitoring of licensing action reviews and enabled better decision-making in on-site inspection decisions during the COVID-19 public health emergency. OKRs in 2021 will capture specific positive examples of use of these tools, and how they improved our efficiency, effectiveness, and quality and timeliness of decision-making. The staff will continue to use OKRs as a complement to performance indicators in 2021, as there is still ongoing work related to transformation. The continued use of OKRs in 2022 and beyond will be assessed as part of the agency's annual transformation performance evaluation.

2021 Agencywide OKRs

The EDO has formulated new OKRs for 2021. There is one Objective and supporting KRs for each of the four transformation focus areas. The OKRs are listed here, and further details on the rationale for their development is provided in Enclosure 2. OKRs were transmitted to EDO staff offices on January 4, 2021, with the assignment to develop their own OKRs to support those at the agency level.⁴ These were submitted by the offices on January 29, 2021, and are currently being reviewed by the OEDO.

³ The dashboard is available at: https://app.powerbigov.us/groups/b3658de3-1bd5-46a8-a961-b02565097184/reports/3d70a4ad-f222-40a9-9ed1-5caf80f906fe/ReportSection?openReportSource=ReportInvitation&ctid=e8d01475-c3b5-436a-a065-5def4c64f52e.

⁴ Commission- and Chairman-reporting Offices were also encouraged to submit OKRs.

Be riskSMART Focus Area

Objective: Increase the use of the Be riskSMART framework across all sectors of the agency in 2021 to improve the timeliness and quality of decision-making.

KR1: At least 85% of staff complete the Be riskSMART training module and successfully pass a knowledge check before the end of calendar year 2021.

KR2: The Be riskSMART framework is used in at least 50% of what are determined by office management to represent key decisions related to the execution of that office's mission in 2021.

KR3: In 2021, each office submits to the IdeaScale Success Gallery four examples in which use of the Be riskSMART framework improved the timeliness and quality of decision-making.

KR4: At least 75% of external stakeholders (e.g., public interest groups, industry representatives, other government agencies) surveyed by NRC during 2021 agree that the use of risk information has improved the timeliness and quality of the agency's decision-making over the past year.

Innovation Focus Area

Objective: Leverage staff creativity to innovate the ways that the agency performs its work in 2021, while using the Innovate NRC 2.0 IdeaScale platform to collect, manage and document ideas.

KR1: Of the ideas posted in the IdeaScale Success Gallery in 2021, at least one-third are categorized as a process simplification.

KR2: At least 25% of agency staff engage in a Challenge Campaign in 2021.

KR3: In response to a survey, at least 75% of agency staff indicate that the adoption of innovative ideas is improving their job satisfaction.

KR4: At least 75% of external stakeholders (e.g., industry representatives, other government agencies, public interest groups) surveyed by NRC during 2021 agree that within the past year, the Agency has adopted new processes, tools, or products that are improving the Agency's mission execution.

Focus on our People Focus Area

Objective: Execute culture improvement and strategic workforce plans in 2021 to ensure that staff have the engagement, motivation, and skills to successfully execute our mission now and in the future.

KR1: Each office takes steps to address the behavior and process changes in their culture improvement plan.

KR2: The agency shows improvement in employee engagement as measured by the FEVS administered in 2021 compared to 2020.

KR3: At least 25% of agency staff visit the Career Enhancement and Employee Journey portals and completes a survey about the usefulness of the tools during calendar year 2021.

KR4: At least 75% of the staff responses to the Career Enhancement and Employee Journey surveys indicate that the use of these tools has positively influenced their career path.

Use Technology Focus Area

Objective: Employ greater application of technology, data, and data analytics across the agency in 2021 to strengthen our decision-making process and inform regulatory activities.

KR1: Each office will share in the IdeaScale Success Gallery two cases in which they used data analytics to improve decision-making in 2021.

KR2: Each office should identify at least two use cases for applying automation to improve a work process, which can be referred to the Office of the Chief Information Officer for inclusion in its Information Technology Roadmap.

KR3: At least 90% staff surveyed by NRC during 2021 agree that during the past year, the agency's use of technology, data, and data analytics has strengthened our decision-making process and informing regulatory activities.

KR4: At least 75% of external stakeholders (e.g., industry representatives, other government agencies, public interest groups) surveyed by NRC during 2021 agree that during the past year, the Agency's use of technology, data, and data analytics has strengthened our decision-making process and informing regulatory activities.

CONCLUSION:

The evaluation of the agency's transformation progress using OKRs indicates that the agency was successful in achieving its transformation-related goals in 2020, particularly the development of tools and resources to support innovation and improved decision-making. Goals for 2021 concern the widespread adoption and integration of the new tools and resources into offices' routing work processes. The staff will continue to share information on transformation-related performance measures with the Commission and other interested stakeholders.

RESOURCE:

No additional resources beyond those currently identified in the agency budget are anticipated. The staff continues to assess the resources associated with these activities as part of the normal budget development process.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection.

Margaret M. Doane Executive Director for Operations

Enclosures:

- 1. Objective and Key Results Evaluation for 2020
- 2. 2021 Agency Objectives and Key Results

SUBJECT: UPDATE ON AGENCYWIDE TRANSFORMATION PERFORMANCE MEASURES DATED: February 22, 2021

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