

From: S.A. Romeo
Date: Tuesday, February 4, 2014 6:42 PM
To: SEC <PerformancePlanning@sec.gov>
Subject: Draft Strategic Plan

Re: comments related to the 2014 through 2018 SEC strategic plan.

A mission statement is who you are and what you do. A vision statement should describe what you want to do at some point in the future (a vision). The assumption is, since it is a vision, you don't do these things now. That delivers the message that for example, right now you don't provide protection against fraud and abuse, since that is part of your vision. Is that the message you intended to deliver? The vision statement in your draft plan does not meet industry standard for a vision.

Your strategic goals should be specific and measurable. Perhaps you have another more in-depth copy of the plan than the 42-page draft document posted online for review. For example, strategic objective 2.3 says the SEC prosecutes violation of federal security laws and holds violators accountable through appropriate sanctions and remedies. If you prosecute one person, that objective is achieved. Is one your goal for this indicator?

Under the section titled Environmental Perspective and Outlook, since this is a strategic plan, there should be specific strategies and tactics related to each of these items. Strategies and tactics are thus far lacking in this strategic plan.

With regard to the risks, I assume there are more someplace else and that there are risk mitigation strategies related to each of these. It's good to identify the risks; however, if one only lists them and does not design mitigation strategies and techniques, it is only a brainstorming activity.

Strategic goal number one says: establish and maintain an effective regulatory environment. How will you know when this goal is achieved? There seems to be very little strategy, tactics, and control mechanisms related to this goal. The number of disclosures seems to be the only measurable aspect for controlling and monitoring progress toward these efforts.

As the plan progresses, it becomes more specific and measurable.

You probably should include a stakeholder analysis in your plan as well.

I hope this general thoughts help your efforts.

If I can be of any assistance in your efforts, either facilitating sessions or assisting with risk assessment, stakeholder analysis, interview, analysis or developing the final plan, please don't hesitate to contact me.

I want to mention that using an outside facilitator can often result in better plans, especially if the facilitator has been professionally trained and certified in high-level facilitation. If a trained and certified facilitator is not used, the quality of the sessions can diminish greatly.

Having an external strategy consultant or SME on your strategy team can also greatly enhance the probability of success. Trained strategists automatically use a holistic approach so whenever someone mentions a topic for discussion, a trained strategist automatically begins to think about stakeholder impact, risk assessments, analyzing the amount of time and budget required, etc., and can bring these collective items to the forefront.

My name is S.A. Romeo, “Romeo” and I am the Founder and Chief Strategist for Strategic Planning 2020, LLC, www.planning2020.com, a business and management consulting firm that specializes in helping clients evaluate the past, understand the present and achieve the future. I am the creator of the QuickStart to Strategic Planning™ process. I have helped write, develop, assess or conduct due diligence on over 2,000 plans throughout my career. I have also facilitated over 1,200 sessions.

I have a Master’s degree in Organizational Management. I am a Certified Advanced Facilitator and a Certified International Business Specialist. I am presently a strategy SME (Subject Matter Expert) for Harvard – reviewing and assessing its Core Curriculum Series. I am a member of the Bloomberg Insight Exchange Committee (Bloomberg BusinessWeek) a publication with 4.7 million readers in 140 countries. I also teach in the MBA program for the University of Phoenix.

If I can assist you in your planning efforts as either a facilitator or an advisor on your strategy team, please contact me.

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