

Assessment Guide

**Energy Facility Contractors Group
(EFCOG)
PAAA Working Group**

**Implementing the Assessment Process
At the Department of Energy Facilities**

Submitted by Assessment Guide Task Team:

**Walter Bird, ANL-E
Sandra L. English, PNNL
Alverton Elliott, LANL
Steve Filipowicz, BXWT – Pantex
Greg Peterson, WSRC – Savannah River
Ron Simonton, SNL
Conard Stair, Y-12
Robert W. Swatek, S.M. Stoller Corp – NTS
Brinley D. Varchol, Fluor Fernald
Al Wagner, INEEL - BBWI
Paul Wright, BNFL- ETPP**

**David Ponke, Writer/Editor
Fluor Fernald**

Revision 0

October 2004

DISCLAIMER

This document was designed to help Price Anderson Amendments Act (PAAA) Coordinators be consistent in the application of an assessment process approach at Department of Energy (DOE) facilities. The goal is to establish a common understanding and facilitation of the assessment process and to provide a written reference to reduce ambiguity. At the same time it is recognized that every situation is unique and that you must adapt the assessment process approach that best fits your circumstances.

The information within, while detailed and thorough, is for informational purposes and is not meant to replace the official descriptions or orders controlled by the DOE.

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RECORD OF ISSUE/REVISIONS

EFFECTIVE DATE	REV. No.	DESCRIPTION
06/2003	A	Issue for EFCOG Working Group Review
10/2003	B	Added: Obstacles and Issues, Overcoming Obstacles and Issues, and further input/comments from the Task Team.
10/14/2003	B-SLE-2	Included comments received from SLE and issued to EFCOG PAAA Assessment Guide Task Team for comment by October 24, 2003
11/2003	B-SLE-3	Addressed comments from user community, polished Section 1 for delivery to B. Varchol for incorporation into final product for anticipated delivery to EFCOG QA Group.
01/2004	C	Incorporated comments and additions from the sub-teams and finalized the document for broader review.
06/2004	D	Incorporated comments and additions from the sub-teams and finalized the document for final review. Also includes the incorporation of comments from DOE Office of Price-Anderson Enforcement.
08/2004	E	Incorporated comments and additions from the sub-teams. Also includes the incorporation of comments from DOE Office of Price-Anderson Enforcement.
10/2004	0	Incorporated additional comments and additions from the sub-teams. Also includes the incorporation of comments from other EFCOG Working Groups and the DOE Office of Price-Anderson Enforcement.

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INTRODUCTION

Management and Independent Assessment are discussed in DOE G414-1-1A, MANAGEMENT ASSESSMENT AND INDEPENDENT ASSESSMENT GUIDE FOR USE WITH 10 CFR, Part 830, Subpart A, and DOE O 414.1B, *Quality Assurance*; DOE P 450.4, *Safety Management System Policy*; and DOE P 450.5, *Line ES&H Oversight Policy*.

This guide is to be used as an operational guide for PAAA coordinators and personnel performing formal independent and self-assessments. The purpose of this guide is to:

1. Establish a common understanding of the principles of an effective assessment program.
2. Document and support the identification of obstacles and issues that are getting in the way of implementing an effective assessment program, and
3. Provide suggestions or recommendations for overcoming the obstacles and issues that prevent the implementation of an effective assessment program.

Additional sources of information to aid in providing an orderly and standardized process for preparation, performance, reporting, follow up/closure of independent and self assessments are found in:

Operations Assessments are discussed in the Operations Assessment Field Handbook published by the U.S. Department of Energy, Office of Operations Assessment, EM-25, DOE-EM-STD-5505-96, *Operations Assessment*, May 1996.

[These Guides describe suggested, non-mandatory approaches for meeting requirements. These Guides are not requirements documents and should not be construed as requirements in any audit or appraisal for compliance with the parent Policy, Order, Notice, or Manual.]

I. Principles and Practices of an Effective Assessment Program

Goal: Be the best – in achieving nuclear safety at DOE facilities. Get ahead of just meeting requirements.

What does a highly effective safe facility look like: Employees are highly knowledgeable of the hazards AND the consequences of those hazards to themselves and the public; the programs and practices that are systematically implemented to control those hazards successfully; and each employee assumes personal responsibility for their own safety, their fellow workers AND the public; and the management focus is on empowering AND enforcing the standards of knowledge, accountability and providing the information to employees on a real-time basis the hazards and their personal exposures such that the employees can assume their personal responsibility.

The facility is characterized by: cleanliness; safe practices are always practiced and observed; planning ALWAYS precedes the work; management is thoroughly familiar with every work practice and participates, reinforces high standards of safe performance, the atmosphere (culture) is characterized as “Prevention is always the best and most favored option; there is ALWAYS the time to do it right the first time.

Assessments are a requirement for DOE facilities as identified in Title 10 CFR Part 830, Subpart A--“Quality Assurance Requirements” within the Price Anderson Amendments Act (PAAA) Program. Key to an effective assessment program include:

- A strong message from senior management that a fundamental attribute of achieving excellence in safety and operations is continuous improvement and self-identification of problems through an assessment program is a critical element to continuous improvement
- Clear and consistent senior management endorsement, support and active use of the assessment program
- Senior management setting the example of being inquisitive about problems; and
- Establishing an assessment program lead who reports directly to senior management

Looking beyond the fact that assessments are a requirement, there are additional benefits. A well-planned and executed assessment program will:

- Implement expectations re: employee knowledge of and assumption of personal responsibility for safety (personal and the public)
- Improve systems and processes that contribute to improving safety
- Improve quality and efficiency of production
- Reduce costs by improving quality and efficiency
- Demonstrate pro-activeness instead of reactivity
- Demonstrate compliance with contractual and regulatory requirements
- Reinforce staff behavior by demonstrating management interest and concern
- Management to change the role of safety personnel from controlling to educating, providing real-time information to workers of hazards, identifying best practices, implementing best practices through training and follow-up, and assessing and measuring performance to standards which have been developed based on best practices

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- Measure performance to standards of best practices for achieving goals and objectives
- Inform management of status of processes and programs
- Establish an ability to provide information to external agencies and possibly reduce their intrusion
- Find precursors to significant problems that will prevent significant safety events from occurring
- Prevent financial consequences to DOE and the contractor organization that results from facility shutdowns, delays in completion of projects, additional scrutiny by outside organizations, enforcement actions, etc. that could be prevented through excellence in performance assessment

A self-assessment program should provide reliable information that allows management to be confident the organization is fulfilling the operating contract. Being the best in achieving nuclear safety at DOE facilities. Getting ahead of just meeting requirements.

1.0 GENERAL INFORMATION

Assessments hold organizations and individuals accountable to meeting management expectations for performance. These expectations should be greater than just bare compliance with minimum requirements. Organizational excellence needs to be the standard, rather than the bare minimum.

Individuals and organizations need information on how well their products and services are meeting customer requirements and expectations. This includes knowing what is being done right and what is being done incorrectly, inadequately or inappropriately. Assessment is a feedback mechanism for activities.

To establish a valuable assessment program, the activities and processes that are assessed should encompass all aspects of activities critical to the organization's success. This applies not only to the safety and health aspect of business but also the core functions such as subcontracting activities, securing new work, peer review process, method of responding to employee concerns, etc.

1.1 There are four main objectives for conducting assessments:

- To provide feedback to personnel doing the work. This information can be used to drive performance and organization improvement.
- To keep managers advised about the status and effectiveness of their programs and processes.
- To ensure that the company/organization/project is meeting its goals and objectives, or those of the larger entity.
- To self-identify significant problems before they are disclosed by an adverse event or found by an external body.

2.0 ASSESSMENTS

In general terms, an assessment is the act of reviewing, inspecting, testing, checking, surveilling, auditing, or otherwise determining and documenting whether items, processes, or services meet specified expectations. Assessments may also evaluate if processes are effective and efficient and meet customer expectations.

2.1 Assessment Program Elements

An assessment program should have the following elements:

- Identify “Standards of Performance”
- A documented description that defines the purpose, and the processes that will be used to plan, perform, and follow up on assessments.
- A training program to assure that assessment participants have the proper skills to perform assessments
- Defined roles, responsibilities, authorities, and accountabilities for staff performing and responding to assessments
- Performance metrics that reflect on the assessment process itself (e.g., customer satisfaction, value of assessment topics and findings, etc.)
- A clear link to measurable organization goals and objectives
- Elements of both independent and self-assessment
- Identify the root causes that prevent recurrence
- Assessment results that feed the corrective action system

2.2 Independent Assessment

An independent assessment can be an audit, surveillance, or inspection conducted by individuals within the company but independent from the work or process being evaluated. The purpose of an assessment is to:

- Evaluate compliance with standards and requirements,
- Evaluate the performance of work,
- Measure the quality of the item or service,
- Examine process effectiveness, adequacy and
- Promote improvement.

The organization or staff performing independent assessments should have sufficient authority and freedom from the line organization to carry out its responsibilities. Individuals should be technically qualified and knowledgeable in assessment techniques and in the areas being assessed.

2.3 Self-Assessment

Self-Assessment is a disciplined, systematic evaluation, using identified standards of performance, performed independently of the actual performance of the assessed work but with line management planning, direct participation and involvement. (e.g., 2nd review of test results, post job evaluations, facility walk-thrus,) A Self-Assessment is an organization's/ project's/ or process owner's evaluation of itself and is generally self initiated. Self-Assessments are the responsibility of line or organizational management and are not to be delegated away to independent oversight organizations such as Quality Assurance or Safety. (A self-assessment may be performed for an organization (on their behalf) by a subject matter expert or a QA representative.) It may be focused on compliance, adequacy, or effectiveness all of which lead

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to process improvement. The results of the assessment are documented and reported to the requesting organization.

Self-Assessments are separate and distinct from independent assessments. They demonstrate a proactive system for the early detection and correction of potential problems, and provide management at all organizational levels with an accurate and current awareness of their organization's performance and compliance with high expectations. Self-assessment is just one of the many items competing for limited budget. Since it is an elective process, to some degree, it is important to examine the "culture" within your own organization and determine how staff decides what to assess. An example of how one organization makes the decision on what to assess is presented in Attachment 5, "Self-Assessment Flow Chart."

Self-Assessment programs are generally monitored by and given credibility through a program of periodic independent assessments, which examine expectations of high compliance.

2.4 Management Assessment

Management Assessment (a form of self-assessment) is an evaluation of management systems to assess their adequacy and effectiveness. It is used to determine how well management is providing the leadership to enable an organization to continuously meet internal and external customer's requirements and expectations. A management assessment will look at processes and sometimes the leadership characteristics of an individual. The purpose of the assessment is to identify strengths and weaknesses affecting the achievement of organizational objectives so that meaningful action can be taken to improve the opportunity for success. Management assessments of processes should be comprehensive (from cradle to grave) and not hesitate to cross organizational boundaries. Management assessments should not hesitate to evaluate the adequacy of the current approach and always question if a significant process change would be more efficient/ effective. Always determine, "Are we doing things right vs. doing the right thing."

The value of examining a process from cradle to grave is that it forces communication between participants and focuses on the larger issues that lead to more comprehensive improvements. This is a much more valuable approach rather than spending significant time devising and implementing corrective actions in response to small individual itemized findings.

Management can promote the value of self-assessment by focusing on processes to make sure staff are receiving the support/ tools to do their job. What is it that is working well and what is it that is getting in their way? Are they getting the right training, qualification, documents, procedures, cooperation from another group, etc.? How can the communication, processes or procedures be improved? Is management setting high performance expectations and following through to support the workforce?

Management Assessments should be more than compliance audits. Quality stems from management and performance rather than from an intense system of compliance audits, surveillances, and inspections. Enhancements to management and performance can be accomplished even in situations where compliance has already been achieved.

For performance of an effective Management Assessment, it is necessary that assessments be performed and rolled up to form a comprehensive picture. Senior management must integrate and evaluate the many performance indicators which come from independent, self, and external assessments as well as financial performance, program control information, communications survey results, employee feed back systems and other data sources. Management assessment is a tool for management to use in mitigating risk.

Management Assessment should focus on the identification and resolution of both systemic and cultural management issues and problems. Strengths and weaknesses affecting the

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achievement of organizational objectives should be identified so that meaningful action can be taken to improve quality.

Management assessments need to be focused on achieving high expectations of performance that go beyond compliance. Quality, efficiency, effectiveness, confidence, reputation will lead to lower life cycle costs, improved safety, and more business opportunities.

2.5 External Assessment

An external assessment is an evaluation performed by individuals outside the company or corporation. It can include formal and informal observations of specific work activities and processes, or a comprehensive evaluation of performance and compliance with expectations. External assessments are a valuable source of information for the receiving organization. They are a good way to assess the effectiveness of the assessment program.

3.0 ORGANIZATIONAL ACTIVITY LEVELS

3.1 Process, System, and Program Level Assessments

To shape a comprehensive assessment program that optimizes the application of each assessment type, it may be helpful to visualize the organization as having three interlinked levels of activity. For this discussion, these levels will be referred to as “process”, “system”, and “program”. The following paragraphs demonstrate how the different types and levels of assessment could be applied to an organization’s work control methods. Some of the elements within the work control system are planning, identifying hazards, identifying controls, scheduling, performing, verifying/testing, and documenting the work performed.

3.1.1 Process Level Assessments

A process is a collection of steps or actions that yield some intermediate outcome. Process assessments involve examination of work controls and verification that they are being implemented effectively. Assessments should also assess the effectiveness of the process from a quality and customer satisfaction perspective. Do the workers know and understand the hazards and their consequences? Do they know and follow/observe the hazard(s) controls? Does management require and expect the workers to take personal responsibility for their safety?

At the process level, assessments verify compliance with procedures and ensure the work-control documents (e.g., procedures, instructions, radiation surveys, permits, and safety checklists) accurately reflect the task and associated hazards.

The following overall safety perspective needs to be considered for the overall report.

Who is responsible for safety?

- Each individual must be responsible for his/her safety by being trained, knowledgeable, proactive and perform work in accordance with documented safe working procedures, control, skills, etc.

This does NOT absolve management of their responsibility for safety. Management is responsible for:

- Setting expectations for high performance

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- Establishing systematic processes and controls for safe work performance, identification and control of hazards
- Providing real-time or near real-time information to workers of exposure levels, radiation or otherwise, and any other relevant hazards information required for employees to accurately assess their safe environment
- Providing sufficient training to employees to understand the hazards and the relevant biological effects that make them hazardous to themselves and the public
- Providing leadership by example AND participation
- Continuously evaluating organizational performance to the standards of performance that are based on best practices

3.1.2 System Level Assessments

A system is made up of two or more processes that may operate independently or interdependently and may yield a complete product or service. System assessments focus on whether appropriate leadership and support systems are provided to enable the implementation of work processes. It's important that an adequate number of key assessments be focused at the system level to identify and fix the problems with those processes so they won't happen again and to identify their Root Causes. These assessments are performed to ensure human and material resources are being properly used to achieve an organization's mission and objectives. This level of assessment may range from informal daily oversight of performance to formal periodic evaluations using established protocols.

At the system level, assessments may determine whether all the necessary elements and interfaces are addressed to ensure the process is capable of consistently meeting requirements and customer expectations. The assessment may be performed to determine the cost and resource allocation issues that impact the system.

3.1.3 Program Level Assessments

Program level assessments are used to determine whether overall organizational programs are properly established and implemented. They are appropriate for evaluating complex organizations from several perspectives; consequently, program assessments usually examine the integration of the many systems designed to achieve organizational goals and customer expectations.

For example: At the program level, a maintenance management program, which relies on the work control system, would use results from the process and system level assessments to determine the effectiveness of the entire maintenance program. This program assessment could be performed as either a management assessment or an independent assessment. A management assessment might focus on comparing the strategic goals for maintenance with actual performance to determine whether the rewards and recognition plan targeted to improve maintenance had the desired effect. The independent assessment might compare the program results with contractual and regulatory commitments or customer requirements.

3.2 Assessing for Compliance, Effectiveness, and Performance

There are three different methods commonly used for accomplishing assessments. These are usually known as compliance assessment, effectiveness assessment, and performance-based

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assessment. While each method has distinct characteristics, a comprehensive assessment will use elements of all three.

3.2.1 Compliance Assessment

Compliance assessment focuses on verifying compliance with requirements through the implementation of procedures. Compliance assessment begins with a determination of the contractual and regulatory requirements binding the assessed organization. Assessors then verify that requirements flow down to implementing documents such as procedures, whose implementation is in turn verified.

Assessing for compliance alone may not adequately identify higher-level systemic or programmatic problems or determine the effectiveness of the program. In many situations an organization has written procedures that appear to implement the requirements; however, in practice the intent of the requirements is not fully achieved because of variables such as the way those procedures are executed.

3.2.2 Effectiveness Assessment

Effectiveness assessment begins like compliance assessment, looking for implementation of requirements in procedures and compliance with the procedures in the workplace. This is followed by a determination whether pure compliance has led to effective implementation of the intent of the top-level requirements. The assessor is expected to determine whether a noncompliance or series of noncompliances with procedures could actually result in a failure to satisfy top-level requirements. The assessor must assure the top level requirements are being met. To determine the program effectiveness, the following example may be noted: “Staff are compliant with the procedures on how to prepare a work request– but there are many dissatisfied customers based on not receiving what they want due to the fact that the staff didn’t know how to write specifications.”

Effective assessments can also focus on how effective a specific corrective plan has been to correct a deficient or noncompliant condition or its effectiveness to prevent recurrence.

3.2.3 Performance-Based Assessment

Performance-based assessment takes a different approach by focusing first on the adequacy of the process that produced a product or service and then the product itself. If problems are found in the product or work processes, then the assessor evaluates the methods and procedures used to implement the applicable requirements. This is done to find the failure that led to the problems.

In performance-based assessment, great emphasis is placed on getting the full story on a problem before coming to a conclusion. If an assessor sees a problem with the execution of a welding process, he or she should determine the extent of the problem. Is it limited to one welder? Is it limited to one process? Can the problem be traced to the qualification program for the welder or to the qualification program for the welding process? Or is there a problem with the weld material itself, indicating an engineering or procurement problem?

While the assessor must be familiar with requirements and procedures, in performance-based assessment the assessor’s experience and knowledge play an integral part in determining whether requirements are satisfied. Therefore, participants in performance-based assessments must be technically competent in the areas they are assessing. For example, if an assessor is evaluating a welding process, the assessor relies heavily on his or her knowledge of welding

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codes, welding processes, and metallurgy, rather than just verifying simple procedure compliance.

Performance-based assessment usually provides the most useful information to management; however, it requires a much higher level of competence on the part of the assessment team. In practice, assessments are likely to include elements of all three methods.

Organizations need to establish procedures for planning and performing management and independent assessments. These need to address training and qualification of personnel, planning the assessment processes, performance protocols and tools, reporting, distributing reports, and developing and implementing corrective actions and other follow-up activities

Management assessments share many procedural and protocol commonalities with independent assessments. Because of this, the organization must ensure assessment procedures are well defined and integrated while maintaining the separate focuses of management and independent assessments.

4.0 ROLES OF ASSESSMENT PERSONNEL

4.1 Each organization must define the roles, responsibilities, authorities, and accountabilities for assessment personnel.

Role:

- The fundamental role of the assessment personnel is to evaluate performance to standards, thus providing another indicator to management as to how well it is performing to these standards.
- The assessor needs to be able to collect performance data through interviews, document reviews, observations, and inspection.

Responsibility:

- Provide input to assessment planning that identifies significant areas of risk and the assessment approach that will best serve management.
- Assess the implementation of defined programs and monitor the adequacy/performance of products, services, and deliverables.
- Identify problem areas.
- Report findings in an understandable form and in a timely manner to an appropriate level of management having the authority to effect corrective action.
- Validate the effectiveness of the corrective action and report those results back to management in a timely manner.
- Be capable of making professional judgments on the adequacy and effectiveness of the personnel and the systems. These individuals must be able to go through the appropriate steps in the assessment and be professionally competent / knowledgeable in the field they are assessing. Some specific job tasks may require qualification and/or certification (i.e., Lead Auditors, Welding Inspectors, etc.) to perform assessments.

Authority:

- Authority to request information, observe activities, and interview personnel

Accountability:

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- The assessor is accountable to the individual for whom the assessment was performed. This may be an involved/ responsible manager (self assessment) or the Senior Leadership of the company (independent assessments)

5.0 STEPS IN THE ASSESSMENT PROCESS

The assessment process may be divided into four essential phases: planning, performance, reporting, and follow-up/closure. While each assessment is likely to be different, the steps described in these phases are common to all, regardless of the type of assessment, where the team will be, or what will be assessed.

5.1 Planning Phase

Planning involves both the overall approach and the specific assessment plan.

5.1.1 Assessment Scheduling

The organization should review and update its management assessment schedule on a regular basis, either bimonthly or quarterly, to ensure relevance. The review should consider the current conditions, conclusions of recent management assessments, inputs for independent assessments, and organizational performance.

Management assessments should be planned with input from all levels of management. Some organizations have found it beneficial to schedule the number of assessments but leave some of the topics or areas of assessment to be determined by the performing manager to allow needed flexibility and to allow the manager the freedom to perform assessments that will result in the greatest opportunity for improvement.

The planning process may include and take credit for existing management reviews or similar assessments that routinely occur, such as the following:

- program reviews,
- strategic planning sessions,
- reviews of performance indicators,
- organizational goals- and objectives-setting sessions,
- financial reviews,
- reviews of outputs of improvement teams, and
- reviews of independent assessments.

5.1.2 Overall Assessment Plan

The assessment program should have an overall approach that is developed to the level of detail necessary to ensure adequate review of programs, systems, and processes. This includes the logic for how topics are chosen for review (e.g. generally risk based), the frequency (required frequency or suggested), type of assessment (management, system, independent), responsible organization (to prevent redundancy), and balanced (e.g. business processes as well as safety related processes). Assessments should be planned around what the company must do in order to be successful.

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Evaluating Probability and Consequences of Probability (Risk): Evaluate the program, systems, and processes to identify the various factors and elements that could result in a failure to achieve the mission or the objective's success. Factors to consider include, but are not limited to, the following:

- worker health and safety (injuries, deaths, exposures);
- public health and safety (injuries, deaths, exposures);
- community concerns;
- regulatory noncompliance and liability;
- business efficiency/productivity;
- complexity of the involved processes;
- reliability of the engineering and administrative controls;
- skills and experience of the personnel involved;
- maturity of the program, system, or process (developed, mature techniques/processes versus state-of-the-art or developmental/pilot technology);
- changes that may affect performance (including regulatory);
- life-cycle phase (new, midlife, closeout of activity);
- organizational experience with the program, system, or activity;
- economic costs (uncertainty);
- schedule/commitment or milestones failure; and
- performance measures/indicators, trending downward.

Each of the factors should be evaluated for likelihood of occurrence and severity of consequences.

This is a rough estimate, using professional judgment, and the use of a multidisciplined team for this process is encouraged.

Prioritizing Assessment Activities: Rank the program, system, and process risks based on the consequences and likelihood. Those with high risk or multiple lower risks should be ranked higher. This may identify risks that crosscut several programs, activities, or organizations, thus benefiting more than one organization.

Identifying Areas for Further Evaluation: List the programs, systems, or processes and the areas of risk; then further evaluate other factors such as

- time since the last internal, independent assessment;
- time since other assessments (external, management, process improvement teams, investigations, etc.);

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- opportunities to perform the assessment in conjunction with other organizations (internal or external);
- work schedules (will a lower-ranked program start or complete before a higher-ranked program or activity);
- other scheduled assessments (management assessments, process improvement teams, etc.) that would be expected to address the area;
- availability of assessment personnel, including technical personnel to perform the assessment; and
- certifications, registrations, or other scheduled activities that would be expected to evaluate the program, system, or process.

5.1.3 Specific Assessment Plan

The planning phase of a specific assessment starts when the decision to conduct an assessment is made. It includes those activities necessary for determining the scope, selecting assessment personnel, notifying the organization to be assessed, conducting team orientation, and preparation. The Assessment Leader initiates the assessment planning stage by contacting the responsible manager of the organization to be assessed. At this time, the assessment date is confirmed and a request for documentation (plans, procedures, standards, etc.) is made. This contact is the first step in establishing a working relationship with that organization.

5.2 Performance Phase

The performance phase of an assessment is the data-gathering portion of the assessment and covers the time period from arrival at the assessment location up to, but not including, the post-assessment meeting, when required. It consists of the following activities: the pre-assessment meeting (as required), conducting the assessment, and daily meetings.

5.3 Reporting Phase

The reporting phase of the assessment includes the post assessment meeting (when required), reporting of the findings, lessons learned, and reporting of the assessment. The reporting phase is the means of communicating all the assessment results to others. Reporting may include elements of verbal presentations, lessons learned, as well as written reports. It is important that each organization decide the most valuable means of communicating the results and the effort to be expended. For example, one company found that the most valuable aspect of an assessment report was the periodic updates during the assessment and the visual presentation of the summary of results at the end. For this company, the polished final report was superfluous.

5.4 Follow-Up Phase

The follow-up phase of an assessment starts after the formal report is issued. Some organizations identify that the responsibility for corrective actions plans and the execution rests with the organization which was assessed and that follow up to measure effectiveness should also be an element of the plan. Assessors should be cautious about recommending corrective actions and thereby assuming ownership of the issue and responsibility for the fix. Some organizations consider this to be part of the corrective action management process, but the ultimate responsibility is that it is performed.

Activities may include evaluating the assessee's corrective action response, verification of corrective action, and validation of the corrective action. Each organization should define for

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themselves how they will address: authorities associated with assessments and corrective actions (If management does not want to take all the corrective actions suggested – who has final say?), how the graded approach will be applied to the variety of assessment types, does validation include assessment of effectiveness – or just that they did what they said they would do, etc.

The same techniques used to conduct assessments may be used for verifying corrective actions; however, there are several common ways to verify the implementation of corrective actions, including the following:

- reassessment of the deficient areas;
- review of new or revised quality-affecting documents such as manuals, procedures, and training records;
- verification during the next scheduled assessment; and
- The results of the review (accepted or rejected) are documented on the deficiency report and/or database. ALL objective evidence must be documented when it is accepted or rejected including the reason for rejection.
- The reviewer notifies the responsible manager of the results. The deficiency is closed when the verification process has been completed.
- Determine if validation is necessary.

Validation is the determination that a corrective action is functioning as designed and has eliminated the specific issue for which it was designed. It determines the action taken is effective in correcting both the deficiency and the cause of the deficiency.

□Note: If required and after a reasonable period of time, validation assessment activities may be performed to verify the effectiveness of the corrective action and how it was implemented.

The validation process is done after the corrective action is implemented and after the deficiency is closed.

Validation methods may include:

- Witness of activities
- Review of documents

Results of validation is documented in a subsequent assessment report (audit, surveillance, or self-assessment).

As a result of the assessment process, the following need to be addressed: casual analysis of significant findings, extent of condition for significant findings, formal tracking of issues, and a recommendation for validation of effectiveness (as well as completion) of corrective actions for significant issues and lessons learned.

6.0 ASSESSMENT PROCESS

There are numerous things that are required to be done to lay the foundation, properly organize, and execute the assessment. An assessment consists of a series of activities and steps that require careful and deliberate planning to be successful. This section reviews protocol, explains

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steps in the assessment process, and provides some basic tools the assessor needs to perform meaningful assessments. A strong message from senior management that a fundamental attribute of achieving excellence in safety and operations is continuous improvement and self-identification of problems through an assessment program is a critical element to continuous improvement

Self-Assessment is the most common form of assessment, and is in many cases so integrated into work processes it isn't even recognized as an assessment per se. A Self-Assessment is an organization's evaluation of itself and is generally self initiated. Self-Assessments are the responsibility of line organizations and are not to be delegated to independent oversight organizations such as Quality Assurance or Safety. It is focused on compliance and process improvement. The results of the assessment are documented and reported to the initiating organization.

Self-Assessments are separate and distinct from independent assessments. They promote a proactive system for the early detection and correction of potential problems, and provide management at all organizational levels with an accurate and current awareness of their organization's performance and compliance with requirements. Again with existing rules, performance short of expectations can subject an organization to significant fines and penalties.

Self-Assessment programs are generally monitored by and given credibility through a program of periodic independent assessments, which examine effectiveness.

6.1.1 Assessment Protocol

The active interface with the assessee is the core of the assessment. It is where observations will be made, data collected, interviews conducted, and the initial assessment of compliance and effectiveness is made. The following is a discussion of some human factors that may affect the assessment process and its results.

6.1.2 Putting The Assessee At Ease

It is the responsibility of the assessor to establish an atmosphere that will enable him/her to obtain as much valid information as possible in the time available. When dealing with the assessee, some key principles to keep in mind are: be sensitive, establish trust, promote open communication, and project a positive attitude.

- Be Sensitive To The Personnel involved in the Assessment Process

Being assessed can be a stressful event. Early and clear identification of the purpose of the assessment, why the individual is being interviewed, and how the results will be used, will contribute to alleviating the interviewee's stress. Assessors should be sensitive to the anxiety of the person being assessed and should try to put that person at ease.

- Establish Trust

It is up to the assessor to establish an initial atmosphere of trust. Assessors should stress they are there to assess the systems or programs, not the person. The assessment team should project an attitude of confidence in their ability to assist the organization being assessed. Assessors should help the organization to view the team as a valuable resource for providing input into the objective evaluation of their activities and in bringing to light issues that that should be addressed to prevent more significant issues/events later on.

- Promote Open Communication

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Building rapport and understanding between the assessor and assessee is important in maintaining an atmosphere of openness. It helps to ease tension so the assessor can gain information that would not have been obtained otherwise. To enhance open communication, the assessor should show interest as the assessee talks and recognize accomplishments that are discussed. Also, the assessor should try not to show shock, dismay, or surprise if potentially damaging information is revealed.

- Project a Positive Attitude

The assessment team should arrive at the designated locations on time and be mentally and physically prepared to perform the assessment. They should be prepared and act as a cohesive team with one leader who sets the tone and pace of the assessment. The team should be enthusiastic, unbiased, and project a positive attitude.

6.1.3 Situations To Be Familiar With

There are several areas and/or situations, which an assessor may be confronted with during an assessment. The assessor's effectiveness will be largely dependent upon an understanding of these areas and situations, and the ability to deal with them when necessary.

- Objectivity

The assessor should maintain a conscious objectivity toward the subject being evaluated. This requires focusing on the assessment and the elimination of external factors. Personal beliefs and opinions are biased factors, which may prevent the assessor from fully understanding the conditions that exist and their relationship to the program.

- Fact and Conjecture

The assessor may be confronted with conjecture, suggestions, and leading or distracting questions and opinions. It is important for the assessor to observe facts or obtain objective evidence such as copies of documents, material, data, etc., which support the elements of fact.

- Hostile or Reserved Environment

Due to the fear of being assessed, an assessee may assume a hostile or reserved manner. This condition can be reduced by the assessor assuring that person the purpose of the assessment is to be constructive and not to put blame on anyone. Assurance should be provided to all contacts that the assessment will be carried out in an ethical manner, with no surprises, and that they will be informed of all information of any significance.

- Fairness and Empathy

The assessor should communicate a sense of fairness to the assessee and may express empathy for the conditions or situations that exist. However, the assessor should not ignore a problem, if there is one. The most important role of the assessor is to secure the facts.

- Set Proper Environment for Interviews

If full rapport and candor is expected in an interview, the environment of the interview should be conducive to these results. For example, attempting to interview a line foreman in the noise and interruption of his floor duties will often lead to the inability to communicate. A remote location, which is private, will be more conducive for such interviews. However, if a tour of the area is needed, it is appropriate to follow up with a second interview in a more favorable location. It is essential that a complete and full understanding of the facts be maintained.

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- Deception

Sometimes personnel anticipating the assessment may develop data, statistics, or other information which is offered to the assessor as evidence of corrective action or which proposes to demonstrate that no problem exists. Some people are skillful at using statistical data in a manner, which is deceptive. Such data should be accepted and used only if there is a thorough investigation as to the validity of the data.

6.1.4 Do's and Don'ts

There are a few basic rules that lead to a successful assessment. The following section provides some guidance on assessment protocol by outlining things to do and not to do during the assessment process.

Things To Do

- Learn as much as possible about your audience. Research the organization that you are assessing.
- Keep promises. Going back on you word will cause distrust.
- Be prepared. Ensure you have all necessary materials for the assessment and be organized.
- Know the subject material. Review requirement documents prior to the assessment and be familiar with the scope of work.
- Give positive feedback, when appropriate. It will help the interviewee to relax.
- Maintain control of the interview. Don't let the interviewee take control or you may not obtain all the necessary information. Be composed at all times and be flexible.
- Be a good listener. This will ensure you get the facts straight.
- Cultivate a positive attitude. The interviewee will be more cooperative.
- Observe business ethics. Don't use foul, inappropriate, or condescending language.
- Be professional. Project a serious, positive attitude.
- Stick with the subject. Don't get off track.
- Keep questions clear and concise. It will lessen confusion.

Things Not To Do

- Don't be sarcastic. It projects a negative attitude.
- Don't get into personalities. Don't let personal feelings get in the way of business.
- Don't argue. Try to give the benefit of the doubt.
- Don't be late. It gives an appearance of not caring.
- Don't be negative.
- Don't compare. No one wants to hear how much better another system/etc. is.
- Don't discuss politics. It is neither the time nor place.

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- Avoid using **yes** or **no** questions. Use questions that solicit more in depth answers to ensure you are securing all the facts.
- Don't argue with the other assessment team members. Disagreements should be handled in private.
- Don't jump the chain of command. Make sure every level is aware of an issue or nonconformance beginning at the lowest level of supervision.

II Obstacles and Issues that are getting in the Way of Implementing an Effective Assessment Program

7.0 OBSTACLES AND ISSUES

Improvements in safety are best achieved through setting and achieving high standards of organizational and individual performance based on incorporating 'Best Practices' as the objective performance standard. Assessments provide the opportunity for the greatest improvement at the lowest cost. Assessments that are performed correctly evaluate holistic programs and processes as compared to piecemeal reviews.

So why don't contractor assessment programs find weaknesses before adverse events or other work activities disclose them? This section describes some of the obstacles to an effective assessment program.

7.1 Senior Management Support - Alignment with Strategic Goals

7.1.1 Failure of Senior Management to set high expectations of performance is one of the most important factors (obstacles) to a successful nuclear safety program. As a corollary, lack of Senior Management Support for a strong assessment program based on achieving high performance standards goes hand-in-hand with that failure as a contributing factor. The importance that management places on performing assessments and their expectations for robust results is the most important expectation to be understood by the organization and the assessor(s). Assessments are performed to provide feedback to management of an organization or department, and if management does not believe the information provides value it will not matter how "good" the assessment is, the information will never be used to benefit the organization or department.

Common objections that are the responsibility of senior management to overcome include not providing sufficient time for assessment planning, conduct, and reporting assessment results. In effect line management is saying that assessments are not a priority. Granted other priorities such as workload of personnel performing assessments may reduce the allotted time to perform the assessment decreasing the thoroughness of the assessment, however, if assessments are a high enough priority in an organization, they would be completed on-time and well. So it's not a matter of having enough time, it's saying that I have more important things to do than perform an assessment.

Assignment of line management who themselves believe they have little time to conduct an adequate assessment will result in a less than robust assessment and a weak assessment report. Alternately the manager may not believe the assessment results are of sufficient value to warrant the time required. Senior management directly influences these perceptions.

7.1.2 Overcome the Obstacles:

- Have a senior level "Champion" of the assessment process.
- Link involvement with and successful performance of assessments to the line management performance appraisal process.
- Clearly define and communicate the importance (value added) of the assessment to management.
- Ensure that assessments are linked to items that are critical to success.
- Provide the appropriate types and amounts of resources.
- Provide assessors with the adequate time to prepare for and to complete the assessment without their primary job functions intervening.
- Walk-the-Talk.

7.2 Stovepipe Process – Different Assessment Processes Implemented in Different Projects on a Site.

7.2.1 For some projects, assessments may be implemented differently among different organizations or groups and may focus on small issues within the organization (stovepipes). Assessment activities that are too narrowly focused result in a failure to assess an entire process from cradle to grave throughout the project. The narrowly focused assessments then tend to focus on work observations rather than real assessment of management process throughout the project. Assessments that evaluate work processes merely through observations using a checklist or a checklist mentality often result in a failure to go beyond the checklist mentality to evaluate performance and effectiveness thoroughly.

This is an example of the importance of establishing and using criteria in the performance of assessments. A weak assessment plan will result in weak assessment results and be a significant obstacle in achieving a robust assessment program. Failure to utilize a well thought out assessment plan as a tool to perform an assessment will reduce the chances of success. The assessment plan should clearly identify the criteria upon which the assessor(s) will base the assessment conclusions. For compliance-based assessments or QA audits or surveillances a checklist may be appropriate as an assessment plan. For a strategic/forward looking management assessment, thought provoking, open-ended criteria are likely more appropriate. Not having a plan and established criteria is an obstacle to obtaining robust assessment results.

This obstacle may be exaggerated by using confusing terminology (see the section on Variation in Assessment Terminology, Approaches and Techniques below). If the terminology is defined differently from facility to facility across one site, or if it is interpreted differently from the standards and the guides, then performing successful assessments across the project becomes more difficult.

Recognize that a decentralized process for an assessment program, training, etc. creates challenges that must be monitored and addressed for an assessment program to be effective.

7.2.2 Overcome the Obstacles:

- Senior Management – Establish high performance expectations across the organization.
- Ensure that the scope of the assessment is defined, appropriately focused, and has clearly defined criteria.
- Ensure that assessments are linked to items that are critical to success.
- Assure the consistent implementation of appropriate policies, procedures and tools.
- Stick to the checklist to prevent the possibility of being drawn away from the assessment goals.
- Decentralized processes – Monitor the effectiveness of the decentralized assessment program.
- Assessments need to be integrated across the organization (failure to do so will result in a loss of efficiency and a weakening of the organizations ability to detect repetitive or programmatic deficiencies).

7.3 Cultural/Social Nicety Issues

7.3.1 Within an organization, a community, such as a scientific community, may have individuals who believe that the work they perform is above being assessed. In these instances, the person's perception is that few people could understand the nature of the work that is performed by these well-educated or senior experienced individuals. Therefore, they may expect to be treated

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differently, either as assessors, or as individuals being assessed, and are reluctant to accept criticism. The level to which an individual has risen within an organization may make him/her or others reluctant to be critical of their own programs or the programs of others. This inherent bias against assessment personnel and lack of objectivity and is an obstacle senior management must overcome to have an effective assessment program.

Other social conflicts that may develop include conflicts between managers that could result in uncomfortable working relationships. For example, a manager who identifies weaknesses in another manager's program might be perceived as creating more work for his associate, or pointing out weaknesses in an associate's ability to run/manage their own programs could be interpreted as "why are you picking on me?" Conflicts between organizations may result in incorrect perceptions about what is important to the mission or vision of the project. For example, is the production part of the organization perceived as more important as compared to the safety and health organization (that may be perceived as anti-production)? Finally, social conflicts may influence ones reputation in the community. For example, in a small town community, where everyone knows everyone else and gossip is rampant, one's reputation is everything. Therefore, criticizing the performance of an individual or an organization at work may also result in town gossip. If the individuals, organization, or community believes that identification of weaknesses is bad and would tarnish one's reputation, then there may be real or perceived pressure for the assessors (or assessment team) to be less critical to avoid conflict.

In some instances individuals may be reluctant to identify weaknesses because they know it will result in entering this weakness in an issue tracking system. Some organizations perceive that by opening more issues in the tracking system, and assigning the issues to a specific manager, may reflect poorly on that manager's performance. Once issues are entered into an issue tracking system, they are usually available for anyone to view and comment on. More weaknesses result in more work for that manager on top of what may be an already full schedule.

Senior management must change these perceptions. Assessments identifying opportunities for improvement need to be perceived as "good." It is the first step toward continuous improvement and providing openness to the feedback and continuous improvement process of the Integrated Safety Management System. A change in culture will come when management properly addresses incentives for the behavior they want to see and applies disincentives for inappropriate behavior.

7.3.2 Overcome the Obstacles:

- Have the immediate senior level "champion" the assessment.
- Understand the culture and personality of the organization being assessed.
- Ensure management supports that assessment results should be a tool for continuous improvement.
- Ensure that assessments are linked to items that are critical to success.
- Thoroughly evaluate the results of assessments to identify significant issues (system problems) that fix more and merit the investment in correction.
- Evaluate the reporting mechanism / communication style and make sure the message is being conveyed in a manner that management hears.
- Use performance indicators to evaluate the degree of problem self-identification and the effectiveness of corrective action.
- Publicly recognize exceptional acts of self-identification.
- Use assessors from the facilities or peer group that are being assessed.
- Recognize leadership improvements for individuals or team leadership improvements.
- Provide examples of improvements of ownership enhancing safety, productivity, housekeeping, etc.

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- Communicate closely with those being assessed to help ensure understanding of and ownership for the results.
- Assist the assessment organization when possible to ensure the assessment results are correct and understood by everyone.
- Ensure assessment results are communicated to affected groups and individuals.
- Ensure number of issues that were self identified by each organization/group is recognized.

7.4 Selection of Assessors – Types of people

7.4.1 Failing to select the appropriate individuals to perform assessments results in weaknesses in assessment execution. Assessors that do not have a questioning attitude or who have an expectation of completing the assessment with no weaknesses identified results in assessments that tend to justify what the organization is doing as satisfactory rather than performing a critical look at where programs could be improved and why. Using assessors that do not know how to “pull the string,” or prefer to be “socially nice,” and not be critical of their coworkers, are inappropriate individuals to perform assessments.

Qualifications of personnel performing assessments may not be adequate for the scope and breadth of assessment being planned. This could include areas such as: not having broad enough experience and technical base, not having the ability and willingness to convey constructive criticism, not having a questioning attitude (assessor) that leads to an acceptance of less than adequate performance, not being critical, and not judging overall performance.

In summary, selection of assessors is vital. Criteria for personnel conducting assessments should include:

- Honest, critical judgments/rating on overall performance
- Technical inquisitiveness/questioning attitude of assessor
- Ability and willingness to convey constructive criticism
- Assessment Team Makeup – size and skills based on above

7.4.2 Overcome the Obstacles:

- Establish qualification requirements of assessors based on the assessment goals.
- Use assessors from the facilities or peer groups that are being assessed.
- Interview potential assessors to ensure the right degree of inquisitiveness.
- Ensure experienced assessor leads the team.
- Ensure assessors are technically qualified.

7.5 Weaknesses in Training and Administering an Assessment Program and Conducting Assessments/Assessment Techniques

7.5.1 Once appropriate individuals are selected to perform assessments, training programs enhance those skills and abilities. Some organizations believe that performing assessments is a “right” of management. That is, one should not be a manager if she/he cannot critically evaluate the status of their programs and offer opportunities for improvement.

Some assessments however, are more comprehensive and may require more in-depth training. On occasion, well-intentioned assessors are assigned to perform assessments but they don't know how to assess. Training programs, therefore, tend to have obstacles of their own.

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Training programs often tend to focus on what assessments are, how the project or organization's assessment program is administered, or why assessments are performed. These are important topics and need to be understood by managers throughout the organization, however, for assessors the training also needs to include practical factors. Actual in-field demonstration training should focus on developing appropriate investigation techniques. For example, showing trainees how to plan for and conduct an assessment, practice assessment techniques, "pulling the string" with technical inquisitiveness are topics that should best be demonstrated instead of being taught in a classroom.

Senior management should consider the scope and content of the assessment program training when developing assessors.

7.5.2 Overcome the Obstacles:

- Provide the assessors with sufficient training in the assessment process on how to prepare, perform and document the assessment results.
- Provide the assessors with "pulling the string" techniques to ensure that they can identify the root cause of the problem.
- New assessors should go through at least one assessment as an observer prior to performing an assessment on their own or as a team member.

7.6 Failure to Effectively Plan, Schedule and Coordinate Assessments and Their Results.

7.6.1 Failure to embrace and use an effective and well planned Assessment and Corrective Action Management program results in too much data that does not provide relevant information for senior management decisions. The results of assessments and management walkthroughs, when not properly managed and communicated, often create confusing or conflicting findings that make it very difficult for managers to make informed and meaningful decisions. Ineffective assessment programs can also result in the loss of leading indicators due to poorly documented information, too much information that masks the issues, or failure of management to use the results as an action-forcing mechanism for improving safety performance.

In addition, most corrective action management programs issues are evaluated commensurate with their significance, to determine the priority for resolution. The difficulties here rest in aligning self-assessment and continuous improvement priorities. For example, if there are limited funds, then how does management choose between implementing corrective actions for continuous improvement and/or performing additional assessments that will result in the list of continuous improvements corrective actions growing longer?

The goal with a corrective action management program is not just to close action items in the tracking system; rather the goal is to improve the programs and processes. Corrective actions are designed to prevent recurrence of similar problems and should be evaluated for how effective the corrective actions are at preventing recurrence. There are several attributes of a successful corrective action management program. A graded causal analysis is performed and corrective actions recommended. Management ensures corrective actions are approved, prioritized, and completed in a timely manner consistent with their significance. In this instance the corrective action management process is a required and necessary tool for continuous improvement.

The organization that was assessed is responsible for the implementation of the corrective action plan. An element of the corrective action plan should be a metric that measures effectiveness. One of the goals of a management assessment is to be strategic and forward

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looking. In these instances, who better to recommend improvements to one's own programs and processes than the person responsible for implementing them?

7.6.2 Overcome the Obstacles:

- Ensure the assessment report clearly defines the issues and provides the right level of supporting data. Eliminate redundant or unnecessary information from the assessment report that might cloud the important issues and cause management to focus on less significant items.
- Thoroughly evaluate the results of assessments to identify significant issues (system problems) that fix more and merit the investment in correction.
- Look for conflicts between the results of different assessments and resolve these conflicts before developing corrective actions that lead to ineffective performance.
- Evaluate the reporting mechanism / communication style and make sure the message is being conveyed in a manner that management hears and understands.
- Assure corrective action with certainty and timeliness.
- Provide examples of improvements.
- Incorporate assessment results into the Lessons Learned program for distribution throughout the complex for sharing of information purposes.
- Those conducting the assessment should communicate closely with those being assessed to help ensure understanding of and ownership for the results.
- Assist the assessment organization when possible to ensure the assessment results are correct and understood by everyone.
- Ensure that assessment results are communicated to affected groups and individuals.
- Document program improvements/trending.

7.7 Failure to Adequately Trend Site Deficiencies and Tie Site Trending Information to Performance Assessment Schedules

7.7.1 Resources are limited and need to be managed. Doing assessments just to be performing assessments and not targeting the topics to the weak areas in order to maximize improvement would not be a "good" use of resources. For example, a better use of limited resources would be to schedule assessments of areas that pose the greatest risk or are known to be the weakest programs (from on-going trend analysis), rather than assessing an entire program annually just to assess it. [DOE mandated assessments such as of the RADCON program must be performed, of course.] [To not consider the importance of risk as an indicator for scheduling assessments could result in a significant obstacle in performing assessments as too many will be performed and perhaps in the wrong areas.]

Topic selection for an assessment schedule should focus on assessments that are required or for which there are commitments, and assessments to meet customer demands. Next should be assessments that are not required but management would want to investigate further based on a risk benefit graded model.

Assessments that are required and committed to must be noted for higher priority, and enough flexibility and freedom should exist in the schedule to allow for unscheduled, or customer requested reviews.

The assessment schedule is a critical tool in the assessment process and ensures that the number of assessments does not overload the staff or duplicate assessments. Several

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characteristics must be considered when developing a schedule. The schedule must consider the integration of assessments by organizations or facilities. It must identify the subject matter, scope and frequency of all assessments. Trending data is either unavailable or is not used to target assessments in areas that have presented the greatest challenges and appear to be struggling with poor performance. If you don't have knowledge or information on where your problems are occurring or on performance trends across the projects, it's difficult to focus meaningful assessments on the right area or subject.

7.7.2 Overcome the Obstacles:

- Assure that safety deficiencies are adequately trended through the use of a centralized issues management system.
- Ensure that assessments are linked to items that are critical to success, based upon site trends.
- Follow-up by planning and scheduling a new assessment to evaluate effectiveness of program enhancements.

7.8 Weaknesses in Monitoring Assessments Programs

7.8.1 Focused attention causes improvement, or stated other ways, what is measured and reported improves, or expect what one inspects. Therefore, one mechanism to provide for continuous improvement of an assessment program is the development of metrics that keep management informed of the status or health of the assessment program (an effective set of performance indicators).

For projects or organizations that have difficulty completing scheduled assessments or completing them on time a simple metric would be to track the number of assessments scheduled as compared to the number completed.

For projects or organizations that have difficulty completing the assessment report once the assessment is completed, a metric that tracks the time between performance of that assessment and the date the report is approved and issued should be developed and tracked.

For projects or organizations that do not have consistency in the contents and format of the assessment plan or report then a simple review of the final product as compared to some standard and simple criteria for format and content is appropriate.

Once the assessments are being completed on time with some product being delivered, then track what was done with the weaknesses identified in the assessment reports.

Finally, the robustness of the review should be evaluated. Criteria for this review may be the most subjective. Criteria to consider would be: are the assessments identifying anything of substance, are programmatic problems being identified or missed by the assessment, are minor weaknesses being used to reach conclusions about program effectiveness, and/or does the report draw any conclusions. Metrics for this element can be the number and significance of findings discovered by external assessments versus those that were uncovered by the contractor's assessment program.

Once the criterion is established the quality of the assessments and assessment reports will rise to this level of expectation.

7.8.2 Overcome the Obstacles:

- Periodically assess the assessment process and always include customer satisfaction.

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- Provide an independent review of assessment reports and grade the Assessment Reports to management.
- Use metrics to track the completion of assessments, their timeliness, and their effectiveness in identifying issues before they become significant or before external assessors identify them.
- Adhere to the assessment schedule, but be flexible to change the schedule as appropriate.
- Ensure the assessment organization understands the assessment results (findings and observations).
- Provide feedback of corrective action to those who identify the problems.

7.9 Variations in Assessment Terminology, Approaches and Techniques

7.9.1 Although there are numerous guides, standards and procedures to implement an effective assessment program, the terminology, assessment approach, and the techniques used to perform assessments are interpreted differently by different organizations. This is in part due to too much variability in interpretations of what constitutes a self-assessment, management assessment, independent assessment, audit, surveillance, etc.

Terminology needs to be the same across the organization, so that individuals understand and relate to the common terms. Is it really the most effective use of resources to let each project on a site develop their own assessment programs? (Refer to Stovepipe Process above)

7.9.2 Overcome the Obstacles

The most important outcome of an assessment program is that it demonstrates it is effective at identifying strengths and weaknesses and results in continuous improvement. This can only be done through standardization among terminology, approaches, techniques, standards, guides, procedures, managers, assessors, the organization and the project.

7.10 Summary

7.10.1 Inquisitiveness, extent of condition reviews, striving to reach the bottom of issues, finding real root causes to define the solution, are behaviors driven down through an organization by its leader. If it's important to senior management it will be important to the next level of management. So how does an organization change the thinking to be more inquisitive? Ultimately it rests with senior management. If actions of senior management are perceived to cut corners then the organization will embrace that message and performance will rise (or sink) to that level of expectations. Effective assessments drive the feedback and continuous improvement core function of ISMS.

7.10.2 Overcome the Obstacles:

Place Assessment Results input into Company's ISMS Feedback and Improvement program.

- Worker feedback and improvements
- Lessons Learned coordinator
- QA/PAAA/Training groups review and input
- Summary of reports and programs to executive management

ATTACHMENT 1

EXAMPLES OF SOURCE DOCUMENTS

EXTERNAL	INTERNAL
DOE Correspondences Reports	Occurrence Reporting and Processing System (ORPS) Reports
DOE-OH Assessment/Audits Reports	Noncompliance Tracking System (NTS) Reports
DOE-HQ Assessment/Audit Reports	QA Audits
DOE-Contractor Assessment/Audit Reports	Nonconformance Reports (NCR)
DOE-Contractor ConOps Assessment Reports	CTS Commitments
EPA-State Assessment Reports	Radiological Deficiency Reports (RDR)
US-EPA Assessment Reports	Surveillance Reports
	Self Assessment Report
	Management Assessments

Development of corrective actions begins with the source document, which is generally in the form of an assessment report or tracking document. Source documents may include, but are not limited to, the documents listed above. The Corrective Action Plan (CAP) is generated in response to the source document and shall include the results of a root cause analysis.

The source document and the CAP form the basis for the implementation and completion of corrective actions. Individual CAs are developed and compiled into an overall CAP.

The source of the identified deficiencies should be clearly identified in the CAP.

For the purpose of this attachment, internally generated noncompliances include ORPS-reportable occurrences, Price-Anderson Amendments Act (PAAA) noncompliance issues, and Nonconformance Reports (NCRs) with a degree of complexity, which requires the development of a CAP (as determined by the Responsible Program/Project Manager/Supervisor). Externally generated noncompliances include DOE assessments, DOE correspondence, and any other directive or request from a non-Site entity.

ATTACHMENT 2

GUIDELINES FOR DEVELOPING AND REVIEWING CORRECTIVE ACTION PLANS

Check for the following characteristics when reviewing draft and final commitments or corrective actions.

Must be measurable. Once corrective actions are implemented, an independent reviewer must be able to objectively confirm that they have been completed.

Must specify a deliverable. After the commitment is completed, what will be used to show it was completed?

Must define the affected population. Watch out for the words “all”, “every”, “always”, “everyone”, etc.

Must have a tolerance when appropriate. A tolerance will define the degree of corrective action implementation. If the corrective action specifies training, an appropriate tolerance would be to train 80% of the affected population by a certain date, with the understanding that the balance will not perform the duty until they've been trained.

Must designate the acceptable tolerance if applicable. Nothing is perfect - all machines and processes have operating tolerances. Decide what those acceptable tolerances will be.

Must have one Owner. If an owner is not specified, the commitment may never get completed! Do not list multiple owners. If you specify more than one owner, you are inviting finger pointing if things are not completed.

Must address and correct the root cause analysis. Review the root cause analysis and corrective actions thoroughly. They must agree.

Must be divided into several simpler tasks. If you read a corrective action, and cannot easily see the steps it will take to complete it, it is probably too complex.

Must have a Proposed Completion Date. Break each corrective action down into tasks and sub-tasks. Then estimate how long it will take to perform each one. Add up the dates and determine the estimated completion date. Also remember to expand the completion date 30 days to allow for independent verification.

Must be approved by the people doing the work. If they do not agree with what has been said will fix the problem, more than likely they will not do it the way it was said.

Must be reasonable. A reasonable person would not expect all problems to be fixed in just one or two comprehensive corrective actions. Quality is achieved by *incremental improvements*. Make sure the proposed completion date is reasonable.

There must be some method to allow for updating and revising corrective actions. This may occur for the following reasons: it is determined that the originally stated corrective actions will not correct the problem and they must be revised, additional corrective actions are established, responsibility for the corrective actions are transferred to someone else, and corrective actions due dates must be extended.

ATTACHMENT 3

CORRECTIVE ACTION COMPLETION AND SUPPORTING DOCUMENTS

When a client identifies weaknesses with a program, the contractor is required to respond by implementing corrective actions. When corrective actions are completed, we are obligated to prove to the client that those corrective actions have indeed been completed. This is done with a Letter of Completion from the responsible organization.

The Letter of Completion is a formal correspondence from the Project/Program Director of the Division responsible for the action(s) to the client. This letter should include all pertinent information supporting the completion of the corrective actions, including the following as a minimum:

- Statement of the Original Weakness
- Root Cause determinations if appropriate
- What Corrective Actions were Completed
- Who Completed the Corrective Actions
- Where the Corrective Actions were Completed
- When the Corrective Actions were Completed
- How the Corrective Actions were Completed

Supporting Documents must be relevant to the corrective actions and should be referenced in the Completion Memo. The goal of this task is to provide the least amount paper with the most amount of information that describes the actions taken to correct the weakness. Below are some examples of Supporting Documents:

Copies of Work Order (WO) numbers	Memo numbers and dates sent
Copies of memos	Letter numbers and dates sent
Copies of letters	Copies of schedules
Primary and secondary contact persons	Scheduled completion dates
Project numbers	Document numbers and issue/revision dates
Copies of document/procedure cover sheets	Procedure numbers and issue/revision dates
Copies of Changes In Operation (CIO)	Copies of affected pages
Copies of current procedure indexes	Copies of health and safety plan cover sheets
Copies of work plan cover sheets	Root Cause Analysis Reports
Completed Nonconformance Reports	Self and management assessment reports
Organizational charts	Site perspectives / maps

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Short procedures and documents	Copies of applicable e-mail
Copies of applicable handwritten notes	Copies of training rosters
Lesson plan numbers	Student handbooks/workbooks
Copies of short lesson plans	Copies of meeting minutes
Meeting attendance lists	Meeting agendas
Copies of completed inspection checklists	Copies of completed calibration records
Copies of completed maintenance records	Copies of telephone conversation notes
Design Change Notices (DCN)	Nuclear Safety documents
Department performance indicators	Safety inspection reports
Lessons learned reports	Photographs and electronic images
Field notes	Safety meeting information
Engineering calculations and determinations	Technical reviews

ATTACHMENT 4

DEFINITIONS

1. Assessment - The act of reviewing, evaluating, inspecting, testing, checking, surveillance, auditing, or otherwise determining and documenting whether items, processes, systems, or services meet specified requirements and are performing effectively.
2. Auditor - An individual whose primary job function is to perform independent assessments.
3. Assessor In Training - A member of the team who participates in an assessment with close supervision by an assessment professional or assessment team leader.
4. Assessment Team Leader - An individual who manages a specific independent, self, or management assessment by leading and coordinating the resources of the assessment to ensure assessment quality; who is trained and/or qualified in the methods of leading an assessment team.
5. Assessor - A general term to include any person trained and/or qualified to participate in the assessment process.
6. Audit - A planned and documented assessment performed to determine by investigation, examination, or evaluation of objective evidence the adequacy of, and compliance with established procedures, instructions, drawings, and other applicable documents, and the effectiveness of implementation.
7. Corrective Action - Measures taken to rectify significant conditions adverse to quality and, where necessary, to preclude repetition.
8. Concern - A Concern is a determination of a programmatic breakdown or widespread problem supported by one or more findings.
9. Deficiency - Lacking in characteristic, documentation, or procedure that renders the quality of an item or activity unacceptable or indeterminate; or a nonfulfillment of a specified requirement.
10. Extent of Condition – A determination of the breadth and depth of the noncompliance, all occurrences of the noncompliance, including where else the problem might have occurred and whether or not the same or similar conditions/systems exist in other programs or processes.
11. Finding - A Finding is an individual item that does not meet written requirements.
12. Independent Assessment - An assessment performed by an individual or team that is not affiliated with the organization directly performing the work. Independent assessments evaluate the performance of work processed with regard to requirements, compliance, and expectations for safely performing the work and achieving the goals of the organization. The focus of independent assessments should be the items and services produced and their associated processes. Independence is defined as not having direct responsibility for the work being assessed. Independent assessments typically are performed by personnel from organizations or work units outside the one being assessed. (ref. DOE Guide 414.1-1A, section 4.2)
13. Management Assessment - An assessment performed by a qualified individual or team at all levels of management to verify the effectiveness of operational performance standards. Management assessments look at the total picture: how well the management system meets the customer's requirement; the expectations for safely performing work; and the organizational goals, and

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objectives. The emphasis of management assessment is on management issues that affect performance and related processes such as strategic planning, personnel qualification and training, staffing and skills mix, communication, and cost control; organization interfaces; and mission objectives (DOE Guide 414.1-1A section 4.2)

14. Management Assessment Personnel - An individual who participates in or conducts a management assessment.
15. Noteworthy Practice - A condition, which exceeds expectations or common practice (e.g., goals, performance, established requirements, etc.) worthy of raising to the attention of management.
16. Observation - An observation is an assessment conclusion that identifies a condition that is not a deviation to a written requirement. An Observation, if resolved, could lead to excellence in operations.
17. Recommendation - Any method of improvement offered to the effectiveness or efficiency of an activity, process, or product (e.g., List Management Practice).
18. Root Cause - The most basic cause(s) than can be reasonably identified and that management has control to fix.
19. Self-Assessment - An assessment of work conducted by individuals, groups, or organizations directly responsible for overseeing and/or performing the work. Assessments that a contractor conducts on its own performance (context from DOE P 4450.5 *Line Environment, Safety and Health Oversight*, June 1997)
20. Subject Matter Expert - An individual who is a technical expert and/or technical representative assigned to support the assessment team and evaluate the technical accuracy and appropriateness of a particular area or function.
21. Validation - The process of evaluating a product at the end of the entire development process to ensure compliance with requirements, or the measurement of effectiveness regarding corrective actions.
22. Verification - Synonymous with assessment. Their use is determined by who is performing the work. Assessments are performed by or for senior management. Verifications are performed by the line organization.

ATTACHMENT 5

EXAMPLE OF HOW AN ORGANIZATION DECIDES WHAT TO ASSESS

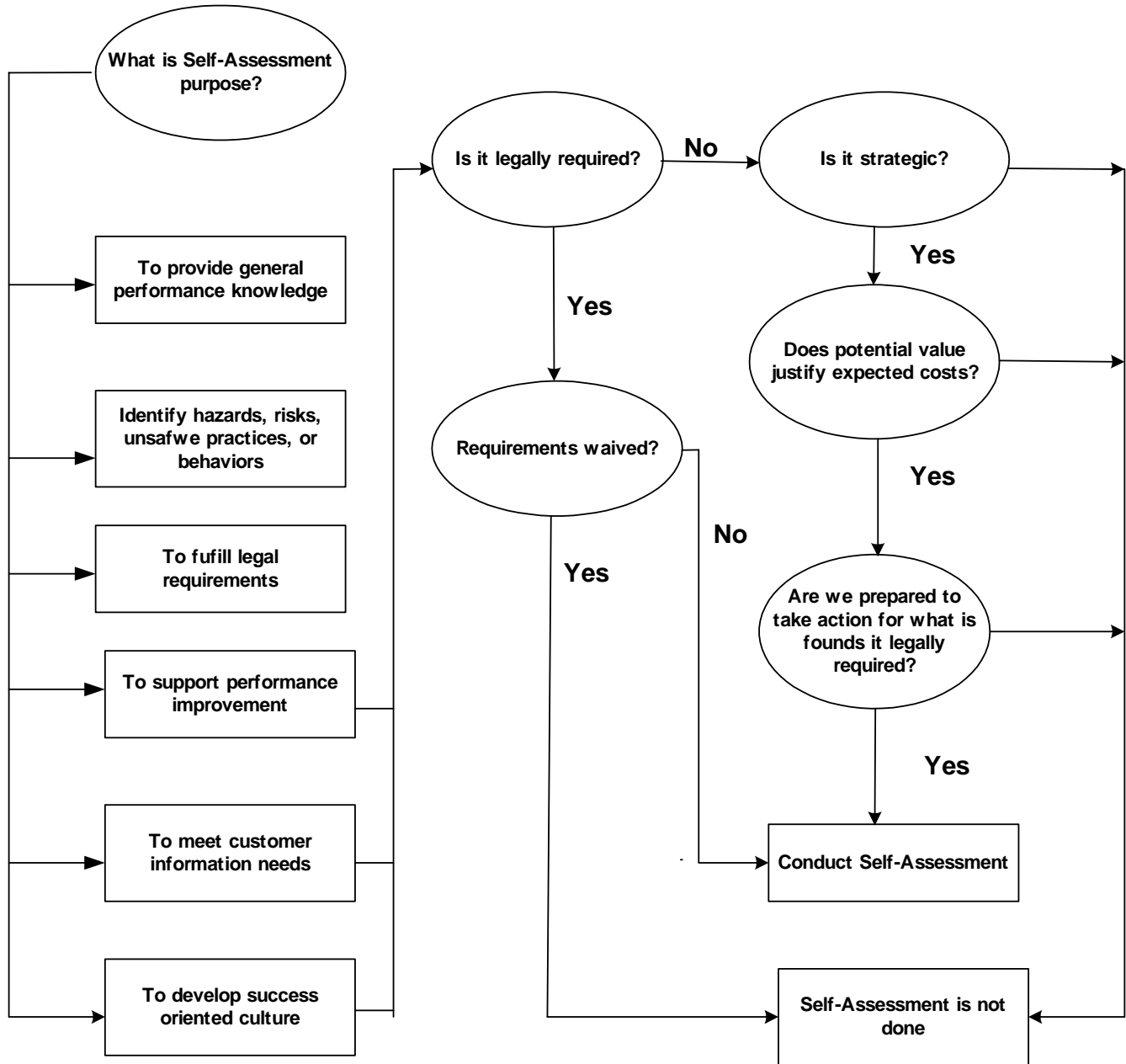


Exhibit 1 – Example of a Team Self-Assessment Walkabout Program

Purpose

The purpose of the team self-assessment walkabout program is to support continuous improvement and promote employee ownership of performance by using work teams to assess overall performance of the facility in meeting environmental, safety, health, radiation protection, and quality assurance requirements, to assess implementation of Orders, standards and procedures, and to evaluate the effectiveness of management systems and controls in meeting contractual requirements and strategic objectives.

Description

Team self-assessment walkabouts are activities taking approximately 3 to 5 hours in which small, diverse teams of individuals working in a participative manner, identify process improvement opportunities and non-compliance with requirements. This approach is taken to improve the organization's performance, to increase worker involvement in evaluating the processes, to enhance individuals' awareness of other functions in the organization, and to improve working relationships between managers and workers.

Team Self-Assessment Walkabout Procedure

- 1.0 The team self-assessment walkabout should identify improvement opportunities by evaluating key processes and activities potentially in need of improvement, and by reviewing compliance. Decide which activities should be covered by the team self-assessment walkabouts. Review various inputs available on facility performance.
 - Compliance Requirements
 - Lessons Learned
 - Performance Indicators
 - Performance Trends
 - Commitments
 - Management Requests
 - Employee Suggestions
 - Job Observation
 - Post Activity Reviews
- 2.0 Prioritize the areas for review during the upcoming year. Consider risk, benefits, goals and objectives, customer expectations and obligations and on the team self-assessment walkabout activity's ability to optimize performance, mitigate risks, and maximize efficiency.
- 3.0 Establish a schedule and minimum frequency for the team self-assessment walkabouts based on funding, manpower availability, environmental, and operational factor. Team self-assessment walkabout activities should occur at least monthly.
- 4.0 Walkabout Team Activities
 - 4.1 Team self-assessment walkabout activities are conducted to identify hazards, efficiency and effectiveness opportunities, to comply with requirements, to build trust between workers and managers, to promote positive interactions between employees, to ensure that employee issues are heard and acted upon, and to promote leadership throughout the organization.
 - 4.2 Select appropriate team members.

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- 4.2.1 Teams should consist of a cross-section of employees, both laterally and vertically, and should be led by an appropriate individual. For example, if the area to be assessed is possible productivity improvements related to machine shop operation, one of the senior machinists may very well be the proper individual to lead the effort.
- 4.2.2 A manager or supervisor will generally be involved in every team self-assessment walkabout. The managers and/or supervisors involved should be responsible for the areas being assessed. The manager should not lead the effort but rather participate on the same level as other team members.
- 4.2.3 Ensure the necessary technical subject matter expertise is included.
- 4.2.4 Select other members based on their availability, the value of the activity to them and their potential contribution to the team's activity.
- 4.3 Develop a checklist for the lines of inquiry to be used on the walkabout. Since the team self-assessment walkabout will address topical areas, a checklist should be used. Depending on the scope of the assessment, the checklist could include using as a highlighted company procedure, or a multiple-page document prepared by the subject matter expert, detailing the technical requirements to be reviewed.
- 4.4 Prepare the team for conducting the self-assessment walkabout.
 - 4.4.1 Provide a general discussion on the purpose and how to conduct the assessment.
 - 4.4.2 Members should read appropriate documents including procedures, reports, trends; lessons learned summaries, and employee suggestions as well as be given an overview of the technical aspects of the assessment by a subject matter expert.
 - 4.4.3 Prepare and review the checklist with the team.
 - 4.4.4 Assign walkabout responsibilities to each individual.
- 4.5 Conduct the team self-assessment walkabout.
- 4.6 Analyze the results of the walkabout. At the end of team self-assessment walkabout, the participants need to review the assessment for areas of improvement and lessons learned.
 - 4.6.1 Document the results (actions taken, or actions needed) in an Automated Tracking System (ATS.)
 - 4.6.2 Assign responsibility for acting on the improvement opportunities and employee issues. In general, where a physical location (building) or particular activity (carpenter shop) is involved, it would be expected that the supervisor or manager of that area or activity would be responsible for completing identified actions.
 - 4.6.3 The individual assigned responsibility for an action in ATS is responsible for tracking the item to closure.
- 4.7 Evaluate the value of the team self-assessment walkabout activity on a scale of 1 to 10 where 1 indicates no value and 10 indicates great value to the organization.
- 4.8 Describe benefits gained from performing this specific activity. If there is a cost saving to be gained by completing the recommended actions, what is the one timesaving or annual savings to be realized?
- 4.9 Evaluate the effectiveness of the team's interactions with each other and the work group, how effectively and efficiently the team performed, and whether any process or productivity improvements should be made.
- 4.10 Document suggestions for improving the team self-assessment walkabout process in ATS.

Exhibit 1-1 Team Self-Assessment Walkabout Process Drawing

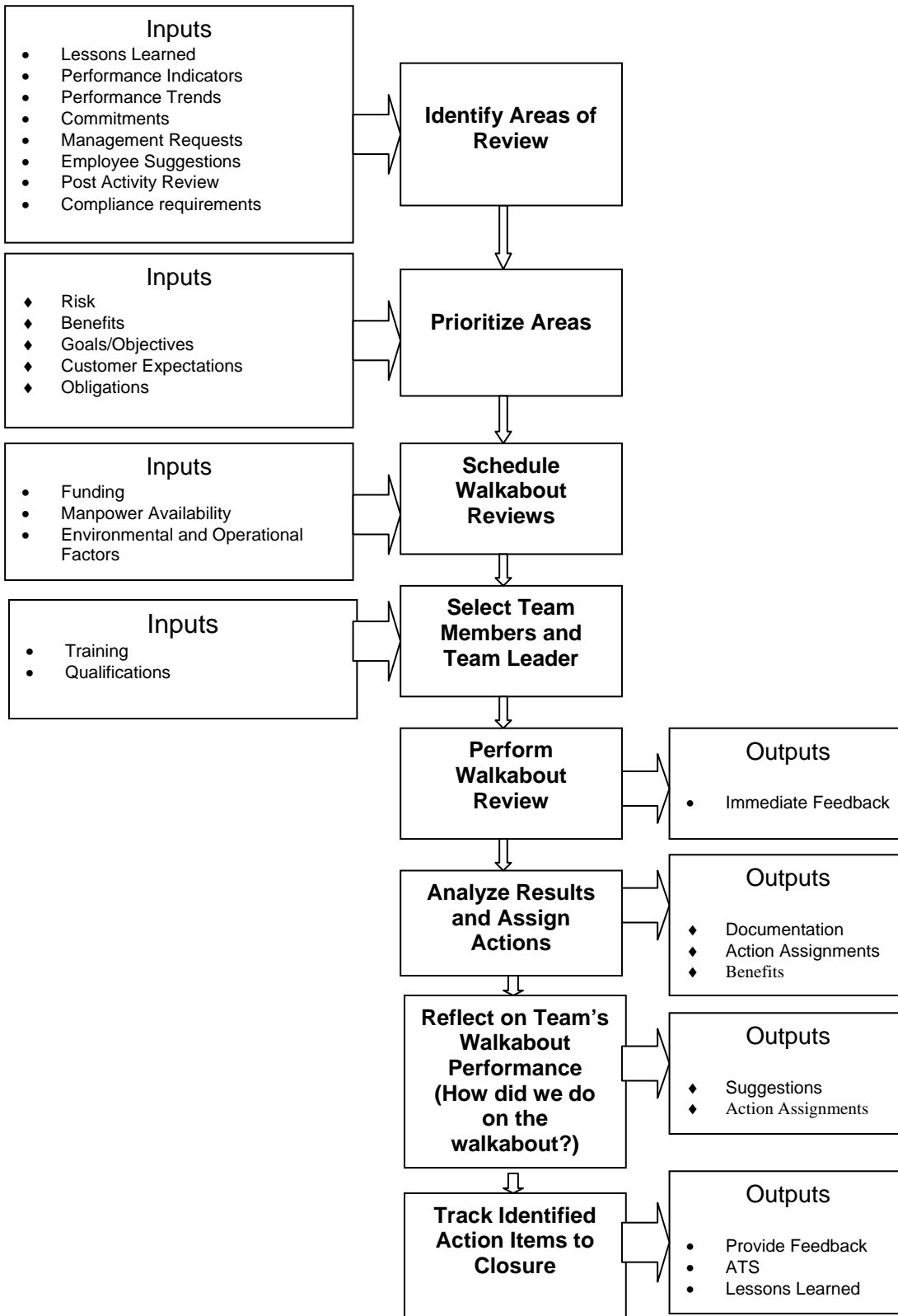


Exhibit 1-2 Team Self-Assessment Walkabout Report Outline

Date: _____

Location: _____

Team Leader: _____

Participant: _____

Participant: _____

Participant: _____

Participant: _____

Self-Assessment Topical Area and Purpose of walkabout: (Check list attached)

Persons contacted:

Opportunities Identified and Action Assignments:

Potential benefits and savings identified during walkabout:

Describe Benefits

One time savings \$_____ Annual savings \$_____

Indicate Overall Activity Value to Organization **(low) 1-2-3-4-5-6-7-8-9-10 (high)**

Team reflection evaluation:

Team reflection suggestions:

Exhibit 2 – Example of an Employee Self-Assessment Walkabout Program

Purpose

The purpose of the employee self-assessment walkabout program is to support continuous improvement and promote employee ownership of performance by having individuals perform walkabout observations of operational and administrative areas within the plant. Observations are limited scope, single focus evaluations of the implementation of environmental, safety, health, radiation protection, and quality assurance requirements as well as evaluations of process elements that can be evaluated through direct observation during a walkabout.

Description

Employee self-assessment walkabouts are activities taking approximately 1.5 hours including preparation and post walkabout debriefing. The activity identifies and communicates process improvement opportunities and non-compliance with requirements to management. This approach improves the organization's performance, increases worker involvement in evaluating and improving processes, and enhances individuals' awareness of requirements and activities in other parts of the organization.

Employee Self-Assessment Walkabout Activities

Recommendation for Implementation strategies

- 1.0 The employee self-assessment walkabout identifies improvement opportunities and non-compliance by observing facilities and activities.
 - **Compliance requirements (specific elements such as housekeeping, equipment guards, equipment tags)**
 - Lessons Learned (identify similar conditions or action taken)
 - Manager requested field review
 - Follow-up on Employee Suggestion
 - Follow-up on Job Observation issues
 - Follow-up on Post Activity Reviews
- 2.0 Target the areas and issues for review during the upcoming year. Consider scope, risk, benefits, goals and objectives, customer expectations, and obligations.
- 3.0 Establish a schedule and minimum frequency for the employee self-assessment walkabouts based on funding, manpower availability, environmental and operational factors. Employee self-assessment walkabout activities should occur daily.
- 4.0 Employee Self-Assessment Walkabout Activities
 - 4.1 Employee self-assessment walkabout activities are conducted to identify hazards, efficiency and effectiveness opportunities, to verify compliance with requirements and expectations, to build ownership in the organization's performance, to promote positive interactions between employees, and to promote leadership throughout the organization.
 - 4.2 Select appropriate individuals.

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- 4.2.1 All individuals at the facility should be tasked with at least one employee self-assessment walkabout activity per year. Ensure individuals are capable of safely performing the walkabout activity in the assigned area.
- 4.2.2 Managers and supervisors must make it clear when they are performing an employee self-assessment walkabout activity so that it is clear that they are not performing a manager walkabout activity
- 4.3 All employee self-assessment walkabouts should have a checklist. Depending on the nature of the assessment, the checklist may be a highlighted company procedure, or a short list of specific physical checks to be made. Normally the checklist will be prepared by the subject matter expert or the responsible manager, however the person performing the walkabout may generate the checklist used.
- 4.4 Prepare to conduct the self-assessment walkabout.
 - 4.4.1 Individuals performing self-assessment walkabouts should be trained on the purpose and how to conduct employee self-assessment walkabouts.
 - 4.4.2 The individual should be familiar with the checklist and what to look for prior to starting the walkabout.
- 4.5 Conduct the employee self-assessment walkabout.
- 4.6 Document the results of the walkabout on the employee walkabout form or directly into ATS or other database.
 - 4.6.1 Document the results (actions taken, or actions needed) in ATS.
 - 4.6.2 The individual performing the walkabout should debrief with the walkabout coordinator and/or action manager.
 - 4.6.3 The individual assigned responsibility for coordinating employee self-assessment walkabout activities assigns responsibility for acting on the improvement opportunities identified. In general, where a physical location (building) or particular activity (carpenter shop) is involved, it would be expected that the supervisor or manager of that area or activity would be responsible for completing identified actions.
 - 4.6.4 The individual assigned responsibility for an action in ATS is responsible for tracking the item to closure.
- 4.7 The employee evaluates the value of the employee self-assessment walkabout activity on a scale of 1 to 10 where 1 indicates no value and 10 indicates great value to the organization.
- 4.8 Describe benefits gained from performing this specific activity. If there is a cost saving to be gained by completing the recommended actions, what is the one timesaving or annual savings to be realized?
- 4.9 The employee(s) evaluate(s) the effectiveness of interactions with the work group observed. How effectively and efficiently was the walkabout performed? Should any process or productivity improvements be made to the walkabout process?
- 4.10 Document and track suggestions for improving the team self-assessment walkabout process in ATS.

Exhibit 2-1 Employee Self-Assessment Walkabout Process Drawing

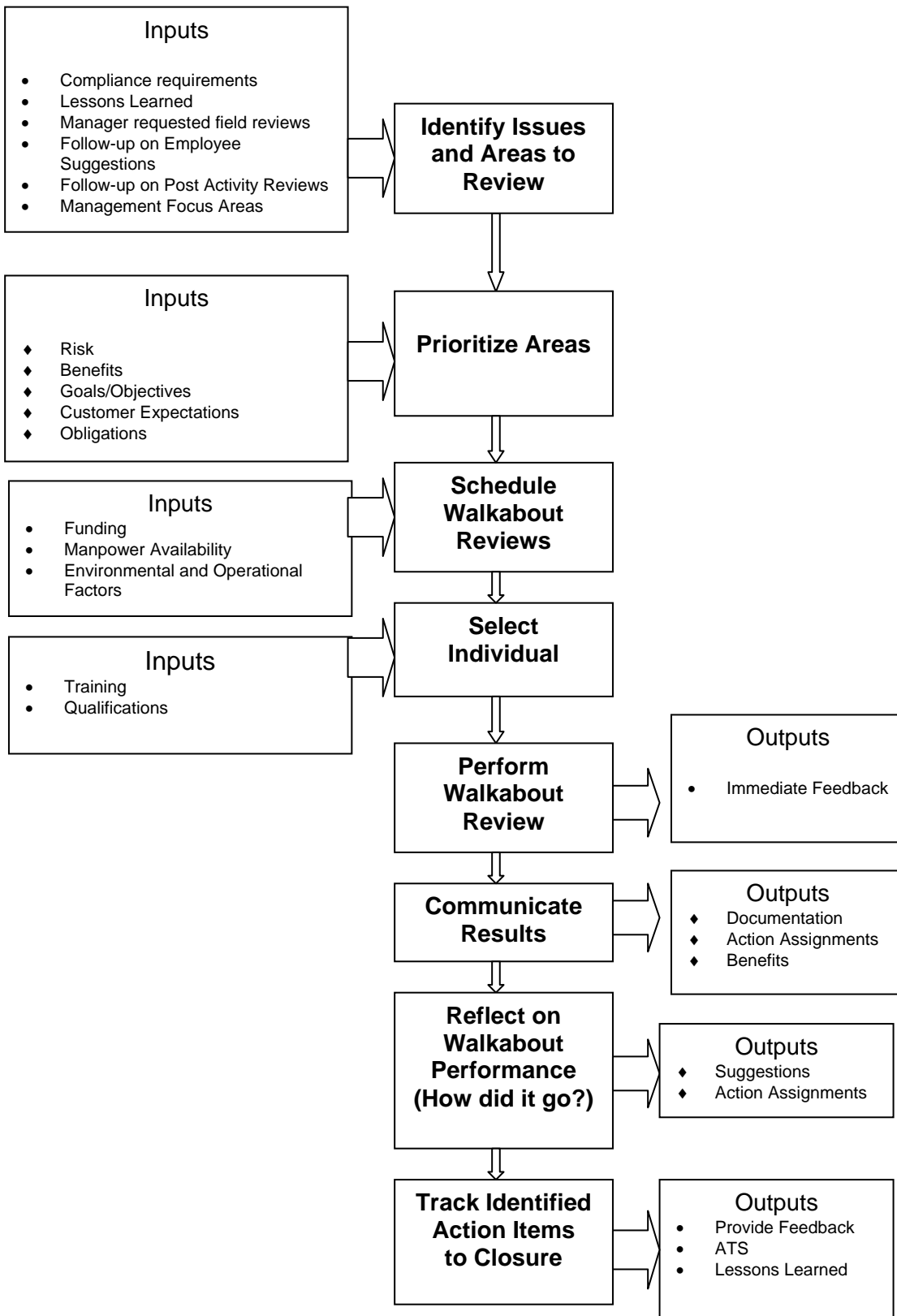


Exhibit 2-2 Employee Self-Assessment Walkabout Form

Date: _____
Location: _____
Participant: _____
Participant: _____

Self-Assessment Topical Area and Purpose of walkabout: (Check list attached)

Person(s) contacted:

Opportunities or Deficiencies Identified and Action Assignments:

Potential benefits and savings identified during walkabout
Indicate Overall Activity Value to Organization (low) 1-2-3-4-5-6-7-8-9-10 (high)
One time savings \$_____ Annual savings \$_____
Comments:

Reflection evaluation:

Reflection suggestions:

Exhibit 3 – Example of a Manager Walkabout Program

Purpose

The primary purpose of conducting walkabouts is to promote communication and trust between managers and other workers, and to identify improvement opportunities by actively soliciting the workers' inputs, needs and concerns.

Description

Manager Walkabouts are performed to establish trust and mutual respect, and to follow-up on completed actions. The management walkabouts are conducted honestly, in an informal manner, with enthusiasm. The walkabouts do not evaluate or assess but rather are used to gather input from workers. They focus on how well employee concerns/suggestions and previously identified walkabout items are being resolved, on worker perceptions, on ideas for improving the working environment or processes and on improving the bi-directional communications in the organization. This approach is taken to build trust between workers, supervisors, and managers, to build ownership, to demonstrate sponsorship and to improve the overall performance of the company.

Manager Walkabout Activities

Recommendation for Implementation strategies

- 1.0 Decide which activities should be covered by walkabouts. There are three key types of manager walkabouts activities, they are: verifying the effectiveness and responsiveness of actions taken to resolve previously identified worker issues, gathering worker inputs, and sharing information.
- 2.0 Establish a schedule and minimum frequency for manager walkabout activities. For example:
Supervisor/foreman: Daily
Department Manager: Weekly
Director: Biweekly
- 3.0 Walkabout Activities
- 3.1 Manager walkabout is an informal process to improve communications between supervisors, managers, and other workers. The following guidance is provided to help optimize the time spent by the managers and supervisors during walkabouts.
- 4.0 Walkabout Procedure
- 4.1 Have an objective for doing the walkabout. For example:
 - To find out from individuals how responsive management has been,
 - To find out how the workers feel about a recent change in policy,
 - To provide feedback on actions taken due to previous walkabouts,
 - To ask for suggestions on ways to improve work or the working environment,
 - To explain actions being taken that may be important to individuals,
 - To share reasons for a new policy or expectation,
 - To get to know more about individuals and their personal goals, interests, and families, and
 - To let individuals get to know you.

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- 4.2 Share your walkabout objective(s) with the individuals you encounter.
- 4.3 Be flexible. Modify your walkabout objective(s) due to inputs you receive, as appropriate.
- 4.4 It is important that the activity is not an assessment process or perceived as one. Do not take notes during the walkabout.
- 4.5 When the walkabout has been completed, prepare notes from the walkabout and document any commitments you have made on the Commitment Tracking System.
- 4.6 Evaluate the value of the manager walkabout activity on a scale of 1 to 10 where 1 indicates no value and 10 indicates great value to the organization.
- 4.7 Describe benefits gained from performing this specific activity. If there is a cost saving to be gained by completing the recommended actions, what is the one timesaving or annual savings to be realized?
- 4.8 Evaluate how effective you were in your interactions with others and in achieving the walkabout objective(s). (Post activity review)
- 4.9 Identify what element of interaction you would like to personally improve upon during your next walkabout activity. (Post activity review)
- 4.10 Tell the individuals to whom the commitments were made what is happening with their inputs.
- 4.11 Periodically share what you are learning with the work group(s) involved. Protect the sources of the information you are sharing with the group.

Exhibit 3-1 Manager Walkabout Process Drawing

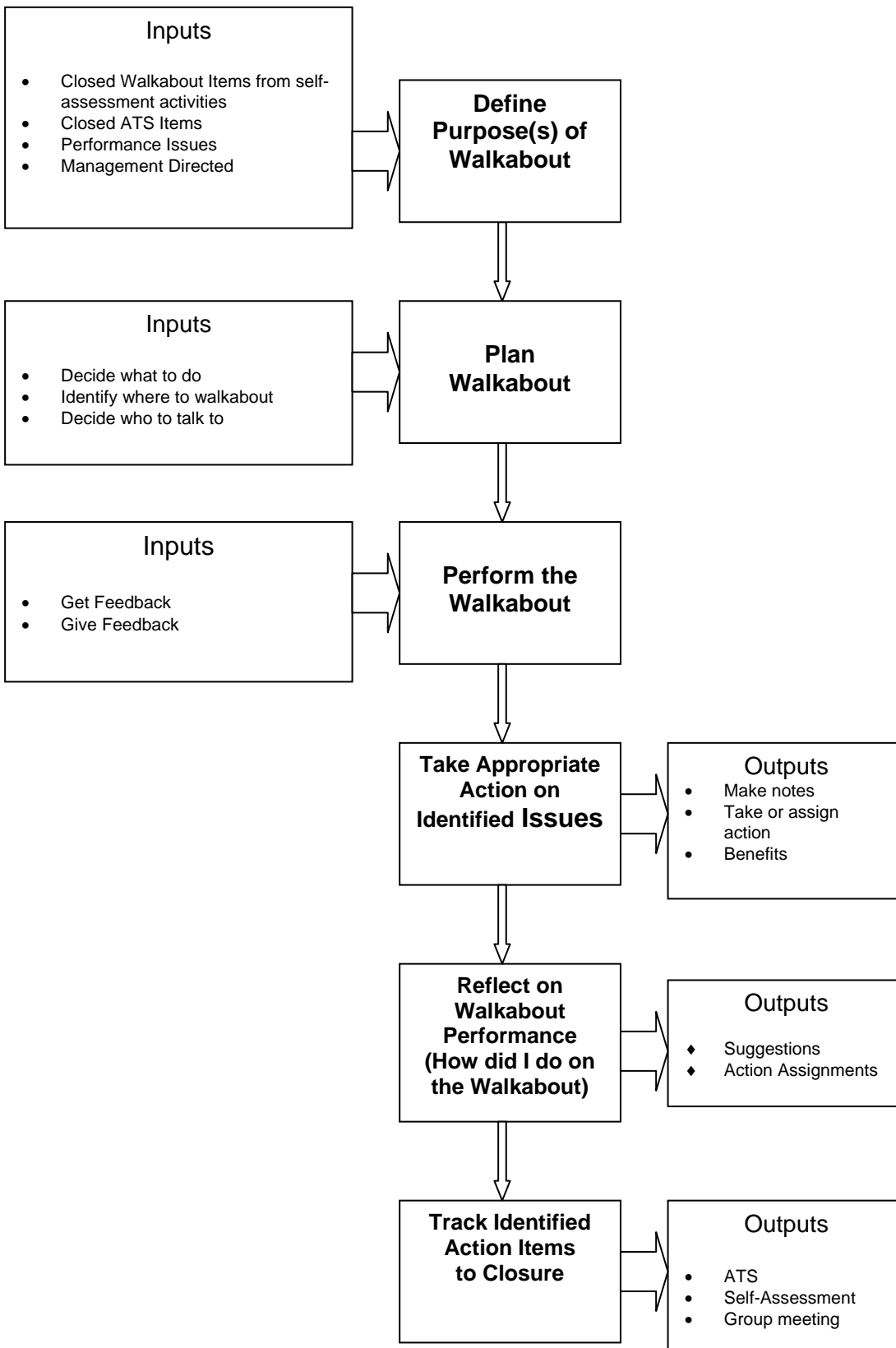


Exhibit 3-2 Manager Walkabout Activity Form

Date: _____

Location: _____

Manager: _____

Why am I doing this Walkabout?

Who should I talk with? Who did I talk with? Individuals:

What issues did they raise?

What commitments did I make? To whom did I make a commitment?

Potential benefits and savings identified during walkabout:
Describe benefits:

One time savings \$_____ Annual Savings \$_____
Indicate Overall Activity Value to Organization (low) 1-2-3-4-5-6-7-8-9-10 (high)

How did I do?

How will I apply what I learned next time I go out?