

External Assessment & Evaluation Logistics Guide: A Resource Guide for the **DOE** Community

Generated by the Integrated Safety Management and Contractor **Assurance System Working Groups**

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Introduction

Various entities in the United States Department of Energy (DOE) complex—such as the Office of Enterprise Assessments and the DOE Voluntary Protection Program (VPP)—conduct assessments, evaluations, reviews, etc. of prime contractor organizations periodically. With ongoing changes to both DOE and prime contractor personnel, it is understood that many individuals are supporting external assessments for the first time. The EFCOG Safety Culture Community of Practice and the Contractor Assurance System (CAS) Working Group developed this document to identify best practices, lessons learned, and tools to help prime contractor personnel support external assessments of their organization efficiently and effectively.

Note: While it is recognized that the Oak Ridge Associated Universities safety culture evaluations and the emerging Safety Culture Assist Visit process are not assessments as described in DOE O 226.1B, *Implementation of Department of Energy Oversight Policy*, and related documents, this guide may still be applicable to components of these and similar processes, especially when coordinating logistics for external visitors, survey (questionnaire) administration, and document requests.

The topics covered in this guide are as follows:

Topic 1. Communications. Develop communications for the assessors, managers, and employees throughout the planning, conduct, and follow-up of the assessment, including regular status meetings with the assessment team.

Topic 2. Pre-Assessment Surveys. Coordinate survey administration, including communications to internal personnel; adhere to industry protocols.

Topic 3. Logistics. Identify a logistics point of contact, develop time and cost estimates, develop schedules, manage physical security and site access, and manage cybersecurity.

Topic 4. Data Calls/Document Requests. Track document calls and then share documents.

Topic 5. Interviews. Plan interviews, select interviewees, and communicate expectations to interviewees.

Topic 6. Follow-Up and Close-Out. Fact-check the assessment report, and disposition results.

Appendix A presents the process flow for an assessment. Appendix B and Appendix C contain logistics templates and safety culture concept crosswalk examples, respectively.

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TOPIC 1. COMMUNICATIONS

Communication is integral to a successful assessment experience for both the assessing organization and the assessed organization. Ideally, communication is repeated through multiple avenues before and during the assessment and is tailored to the audience based on their needs. An external assessment has multiple phases, and associated communications will target specific audiences.

Develop Pre-Assessment Communications

Notification from the external assessor to the organization to be assessed (or finalization of a contract or other agreement if the assessed organization is initiating the assessment) initiates communications. Communication can be maintained via recurring virtual planning meetings with the lead assessor and the organization's manager and logistics points of contact (POCs) to ensure adequate preparation.

• External assessment team. Pre-assessment meetings should be conducted to discuss planning and logistics with both the designated logistics POC and leaders as needed for the assessed organization. Meeting topics may range from conceptual (e.g., what projects and organizations are in scope or out of scope) to logistics (e.g., site or organization security protocols and visitor training) to requirements (e.g., sharing documentation with assessor reviewers). The external team should communicate any assessment process specifics (e.g., confidentiality controls) to the leaders of the assessed organization.

Note: *Site* refers to the physical location where the organization primarily resides. While a site and organization may be synonymous, some organizations may be spread across multiple sites, or multiple organizations may operate on one site.

- Senior leaders of the assessed organization. Senior leaders should be aware of the timing, scope, and requirements basis or drivers for the external assessment and be ready to communicate the current state of the organization/project/lab. Organizational leaders, including the local DOE oversight office, should be aware of any assessment and its status: scheduled, in-process, or concluded. This awareness can include:
 - o any current or planned relevant activities or projects
 - o recent or ongoing impacts (e.g., leadership changes or planned or in-process actions)
 - status of meetings for relevant departments or groups (e.g., Employee Concerns, Labor Relations, or Issues Management and Corrective Action).

Note: Organizational leaders will usually meet with the external assessment team formally for an in-brief and an out-brief. Informally, additional meetings can be useful for open discussion, brainstorming, dealing with any special requests, and capturing lessons learned.

• Employees of the assessed organization. The scope, duration, and intent of the assessment and potential impacts (e.g., potential or required participation in surveys, focus groups, or interviews) should be communicated to all employees, with specific communications to the organization's relevant subject matter experts (SMEs) (e.g., the organization's lockout/tagout SME will be required to participate in an assessment of lockout/tagout methods). A multipronged communication approach is a good practice for ensuring adequate coverage of communication (e.g., cascading messages from managers, all-employee emails from senior leaders, and newsletters or 'porcelain press' hard copy announcements posted in employee common areas). Communication to employees is especially important if they will be invited to participate (e.g., in focus groups, surveys, or interviews) so they know the purpose of the

assessment and know that it is not a phishing or other social engineering scam attempt. If the assessed organization has large or frequent in-person meetings, physical handouts and announcements can be another avenue to disseminate information, especially if some of the employees do not have regular access to email or computers.

Note: If the assessed organization includes a large proportion of union or bargaining unit employees, additional in-briefs and out-briefs and communications with the union stewardship or leadership may be valuable.

Develop Remote Assessment Communications

An assessment may begin with document reviews and interviews being conducted remotely before an on-site visit. If there is no remote assessment component, the following communications should occur during the on-site visit:

- External assessment team. Coordinate a formal kickoff meeting with the leaders of the assessed organization. Separate status meetings or daily debriefings can be held with the team to discuss administrative and logistics support for emerging issues.
- Senior leaders of the assessed organization. Provide an overview of the organization, mission, work, and scope for the external assessors along with any current challenges or pending changes.
- Employees of the assessed organization. Target affected SMEs and others who will be interviewed or included in direct observation of work being performed, with updates on the assessment's status as a part of ongoing communications.

Manage On-Site Assessment Communications

External assessors may need to send out communications periodically during an assessment while they are physically on-site at a location being assessed, usually to perform inspections, walk downs, or observations or to conduct focus groups, interviews, or meetings.

- External assessment team. Coordinate with logistics POCs from the assessed organization to plan interviews, focus groups, walk downs, and observations. This may include daily close-out meetings to discuss the assessment's status and make any corrections or adjustments as needed, including identifying follow-up conversations and issues. Additionally, any emerging issues or potential findings should be communicated to managers of the assessed organization for transparency.
- Senior leaders of the assessed organization. Cascade information about expectations for support to affected organizations (e.g., SMEs

Transparency is important, as is approach; assessors may encounter a notably different response to something like "we did not fully understand how you're complying with XYZ requirement after our discussion with the program SME and would like to know more" vs. "we're looking into a potential finding for XYZ compliance." Inquiry and communication earlier in the process may prevent challenges during a factual accuracy check.

and managers should make themselves available for interviews). If an organization has a large proportion of hourly or bargaining unit employees who will be invited to participate in activities (e.g., in surveys or focus groups), there may be transportation and work planning impacts.

• Logistics POCs for the assessed organization. Provide explanatory direction about materials to be provided (e.g., how to interpret the materials and where to find them) based on initial

document requests Check that information is cascaded to affected parties within the assessed organization (e.g., bargaining unit employees mentioned above) and associated logistics are taking into consideration (see Topic 3, "Logistics," for more information).

• Employees of the assessed organization. Confirm support expectations with line managers. If an organization has a large proportion of hourly or bargaining unit employees who will be invited to participate in activities (e.g., in surveys or focus groups), there may be transportation and work planning impacts.

Send Post-Assessment Communications

Post-assessment communications are sent after the site visit wraps up and end when the report is finalized and results are disseminated. Employees should also be informed of any follow-up actions based on results of the assessment.

- External assessment team. Conduct a formal out-brief with managers of the assessed organization. This may occur before or after a factual accuracy review of the report. Additionally, consider a separate "lesson learned" or plus-delta review of the report or assessment process with the assessed organization to discuss potential improvements for future assessments.
- Senior leaders of the assessed organization. Review the results provided by the assessment team at the formal out-brief. Ensure the employees have information about the results or how the results are driving further decisions/actions (next steps). What are we doing well, where do we need to improve, and what are we doing about it? Include further input opportunities, including on actions.
- **Employees of the assessed organization.** Provide further input at solicited by leadership regarding results and follow-up actions.

Develop General Communications

While there is more information in Topic 3, "Logistics," communication logistics should include the following:

- External assessment team.
 - Provide contact information for all assessors, including mobile phone numbers.
 - Confirm assessed organization's expectations for immediately reporting evidence of imminently harmful safety hazards or security incidents (e.g. report to escort, notify area supervisor, call emergency hotline, etc.). This also includes: allegations of harassment, intimidation, retaliation, or discrimination; or waste, fraud, and abuse to leaders of the assessed organization and the assessors.
- Assessed organization.
 - Confirm external assessment team protocols for notification of negative reactions to assessment practices (e.g. employees feeling intimidated by interviewers, assessor questions interpreted as procedural direction, etc.).
 - Provide contact information for support POCs, including designated administrative, security, safety, and information technology (IT) support.
 - Provide lists of program SMEs for interviews; while assessors may not need SME contact information, they should have the names of relevant SMEs and the interview schedule.
 - Provide site protocols for inclement weather, adverse conditions, or responses to any sitespecific or unique hazards (e.g., wildfires, tornadoes, or uncontrolled release).

TOPIC 2. PRE-ASSESSMENT SURVEYS

Note: Guidance on timing in this section is more applicable to those external assessments that are subcontracted by the prime contractor, rather than being performed by oversight organizations.

Some types of external assessments, especially those with a safety culture component, may include administering a survey to some or all of an organization's population prior to starting the assessment. The survey results then help guide planning for further data collection, including lines of inquiry, specific focus areas, and potential interviews (e.g., a particular group or work location may be an outlier for some of the responses, leading to additional focus groups to gain more context for the survey responses). These pre-assessment surveys may be conducted by the assessed organization or by the external assessors.

Surveys require significant pre-assessment work to be successful; a survey involves coordination with internal departments, adherence with Institutional Review Board (IRB) and human experimentation (i.e., voluntary participation in studies and surveys) protocols and approvals, development of a communication plan, and finalization of survey administration details.

Note: An IRB exists to protect the rights of individuals participating in studies; more information on this topic is provided in 'Adhere to Institutional Review Board Protocols' below. This information is included for reference and as a contracting consideration by assessed organizations; for guidance regarding IRB requirement applicability, contractors should consult DOE Order 443.1 and their Legal, Contracting, and internal IRB, if any.

Coordinate Survey Administration

The external assessment team should coordinate survey administration with internal departments in the assessed organization to establish the best chance of obtaining a high survey response rate.

Within the assessed organization, it is critical that all layers of leaders — from executives to supervisors — are committed to explaining the rationale for the survey and providing individual contributors with the time and resources (e.g., computer access) to take the survey. Office workers can typically dedicate time to complete their surveys. However, supervisors and line management of field workers may need to factor in survey completion time around other work tasks and milestones and provide charge codes or work package numbers as needed.

The external assessment team should make every attempt to consider the following when scheduling surveys:

- Avoid holiday times and popular vacation times (e.g., summer months).
- Avoid overlapping survey requests; schedule separate surveys at least four months apart.
- Consider partnering with other teams (e.g., security, quality, training, or human resources) to combine surveys and reduce the burden on employees.
- Avoid peak work seasons when workers may not be mentally available to add a survey to their tasks (this may depend on the industry or region, and the assessed organization should be engaged to help identify potential challenges).

Survey coordination is not complete without a strong partnership with the information technology (IT) department. Since most surveys are now administered electronically, in-house IT employees and leaders should weigh in on any firewalls, email size and number limitations, or other factors that may inhibit survey links from reaching employee inboxes or employees from accessing the survey.

Additionally, a pre-survey communication plan should be developed in coordination between the external assessment team and the assessed organization. Communication is a primary determinant of survey success or failure, and the communications team along with key leaders across the assessed organization should be involved in designing the communications plan.

- Where feasible, plan communication pathways, frequency, and messages at least two to three months before survey launch and then communications should begin four to six weeks before survey launch.
- The plan should include different methods for reaching employees and encouraging their participation (e.g., word-of-mouth reminders, email reminders, funny or entertaining video snippets, or flyers on bulletin boards).
- In addition to communicating the when, where, who, and how of a survey, employees must be told why they are being asked to participate in the pre-assessment survey. Some employees may believe their feedback is not important, having taken company surveys before without seeing feedback incorporated into their organization's culture or policies.
- When distributing the survey, emphasize why the company is going through this effort now. Is there a certain need or gap that leaders have noticed? How will leaders use the survey information to institute positive workplace changes? How will leaders hold themselves accountable for ensuring that survey feedback is not deprioritized vs. other deadlines, responsibilities, and milestones that must be addressed?

Institutional Review Board Protocols

In accordance with DOE requirements to review all human subjects research prior to starting an activity that <u>may</u> fall under human experimentation guidelines, it is a good practice to engage with the IRB (if any) for the assessed organization. Safety culture assessments may be considered human subjects studies since informed consent is involved (i.e., workers must agree to participate in the survey and understand the risks and benefits, if any). An IRB review is designed to protect the rights and welfare of human subjects by ensuring equitable subject selection and adequate informed consent, evaluating and minimizing risks, and maintaining privacy and confidentiality. DOE IRB information is available on the DOE Institutional Review Boards website. Also, a listing with descriptions of all DOE studies that have received IRB reproval may be searched via the Human Subjects Research Database. While the IRB often exempts safety culture evaluations from extensive reviews, the IRB requires that all invitations to, and protocols for engagements with, DOE workers are reviewed for accuracy and adherence to ethical standards.

Finalize Survey Administration Details

Building time into the survey schedule up front to plan its administration will save time and reduce stress once the survey launches. After the survey content (e.g., questions) has been finalized, discuss

the best ways to administer the survey. A few questions for the external assessment team and the assessed organization to consider follow:

- Will online and paper survey administration methods be employed?
- How long will the survey remain open? Are these dates flexible? Are the results needed back by a specific time to support a customer deliverable?
- How will reminders be handled? Will reminders be sent to employees by the assessed organization or by the external assessors? What will be done to ensure that employees are not being pressured?
- Who will people be directed to if they have questions?
- How will new employees joining the organization after the survey launch obtain access to the survey?

Note: pre-assessment survey deployment logistics, especially for employees requiring a charge code and bargaining unit employees, need to consider coordination for work impacts, similar to Interviews. See <u>Topic 5</u>, "Interviews" for more information, and <u>Topic 3</u>, "Logistics," for general information.

TOPIC 3. LOGISTICS

External assessment logistics may include significant details which require support outside the expertise of the assessed organization's primary logistics POC. Early identification of either dedicated or ad hoc support POCs for administrative, IT, cybersecurity, safeguards and security, and safety tasks is key. Additional factors may include costs, scheduling, physical site access, and more.

External assessors and support POCs should be mindful of time and resource limitations for the assessed organization. Consider the value of the information gathered against the value of the participant's time.

Identify Points of Contact

The assessed organization should identify POCs for the following roles:

- Administrative support. Schedule interviews, focus groups, work observations, and walk downs. Assuring that physical locations are available and that the relevant SMEs will be available. It is likely that some rescheduling will be needed, either due to changes in availability of people, changes to work schedules (for observations), or other challenges (e.g., inclement weather or power outages).
- If multiple administrative POCs will be supporting the effort, make sure there is coordination and turnover. Scheduling support; planning will need to go into booking interview and focus group locations where space is limited. Consider:
 - Large conference space for kickoff events,
 - Medium conference space for assessment team "home base" or focus groups, and
 - Private offices and/or small conference space for one-on-one interviews.

Focus groups and interviews generally cannot be conducted in an open environment, which would not provide confidentiality for participations. Some spaces, like lunchrooms, may seem like a good option outside of break times, but often have too much traffic to be feasible. Likewise, if there are no appropriate spaces at the work site, supervisors may need to plan for and provide transportation to shuttle employees to alternate work locations for meetings.

- Coordinate retrieval and delivery of document requests. Allot time to reformat or redact documents if needed. Some sites may require all documents to be approved for public release before sharing them. Along with initial document requests, there will likely be multiple new requests daily as the assessment progresses. Help the external assessors verify that requested documents have been received (e.g., with a document index; see "Track Document Requests").
- Provide equipment to record interview sessions and other meetings if requested and appropriate (adhering to applicable requirements for public release).
 Note: If the assessment involves sensitive or classified topics, electronic notes or recordings may not be feasible.

This administrative role is key, and backups should be established in case dedicated support availability changes.

- **IT support.** This role may be on-call or dedicated.
 - Provide intranet access if required, or assist in access to document sharing software, locations, etc. if not.

- Assure that the external assessors can access the site's wireless network (guest Wi-Fi), and establish wired network access for areas where wireless is not available.
- Provide audiovisual support for meetings as requested (e.g., kickoff, end-of-day status, virtual interviews, and report out).
- Ensure appropriate navigation of any cybersecurity considerations (e.g., not sharing portable share drives). Consider providing an IT POC specifically assigned to cybersecurity support.
- Safeguards and security support. Assure that escorting, training, and badging requirements for site access are known and addressed appropriately. Provide escorts for the external assessors on an as needed or dedicated basis, depending on escorting requirements. One possibility is to have interviewees escort their external assessor to and from meetings. If interviewee selection is random or ad hoc, avoid having managers perform the escort role for the external assessors. However, employees may feel intimidated if their manager knows that they are going to be interviewed by the external assessors; having escorts who are individual contributors can mitigate this concern.

Note: for both physical site access and access to electronic resources, verify whether the external assessors have HSPD-12 badges or security clearances, and follow associated site protocols.

• **Safety support.** Assure that personal protective equipment (PPE) and training requirements are met prior to on-site engagements and ensure that safety and emergency protocols are communicated to the external assessors.

Estimate Costs

Estimating support hours in advance of the external assessment for management awareness and allocation of resources is a good practice. Additionally, tracking support (including interviewees and any escorts), either through dedicated charge codes or manually, can help managers plan for the cost of similar future external assessments.

Schedule Meetings and Interviews

Regarding scheduling, external assessors may begin with a list of SMEs and POCs to be interviewed and then add to it as the assessment progresses. Depending on the time of year the assessment is being performed, extra time may need to be built into the schedule to accommodate challenges. As mentioned at the beginning of this section, ensuring dedicated support, ideally with backups, is key. Some specific scheduling considerations include the following:

- Assessment duration and meeting methods. The assessment's duration will impact the assessed organization as will requirements for holding meetings, interviews, or focus groups inperson, virtually, or in a hybrid manner. Planning meetings are especially important if the assessment has a tight schedule or if the assessed organization has time constraints for support of the assessment (e.g., end of the fiscal year).
- Organization size (number of employees and physical site). The organization's size will play a large part in scheduling assessment activities. A small organization may have fewer SMEs wearing multiple hats, resulting in fewer interviews than a large organization. Likewise, assessments that require sampling (e.g., 10 percent of the overall population) will need more time to coordinate interviews or observations for large organizations. An overview of the organizations' size, both in terms of number of employees and the physical site, should be provided to the external assessors during planning along with special considerations such as remote sites. The external assessors may request copies of organizational charts or human

resources information system (HRIS) data (e.g., organizational sizes and demographics) to plan interview or focus group sampling. In this case, it's important to coordinate with the assessed organization's HRIS POC to ensure that personally identifiable information is not disclosed.

- Assessment timing in the year. The timing of an external assessment can have a large organizational impact, especially if it occurs near the end of the fiscal year, near a contract transition, or during one or more other external assessments. Additionally, seasonal timing considerations include potential weather impacts, wildfire smoke, or likely natural disasters (e.g., tornados or hurricanes). External assessors should be provided with phone numbers and organizational notification applications to independently verify work impacts, site closures, early releases, delayed starts, or emergency response actions (e.g., shelter in place). While these considerations may not immediately impact the external assessors, there can be large scheduling impacts to interviews, focus groups, or work observations; heat impacts can change work shifts to tropical or backshift, wildfire smoke can impact work locations and PPE, etc.
- **Significant impacts.** Possible schedule impacts include large-scale layoffs, union contract negotiations, active lawsuits (e.g., class action or whistleblower), and investigations (e.g., law enforcement or Office of Inspector General). Scheduling impacts should be communicated to the external assessors, though it may not impact their schedule or the scope of the assessment.
- Work schedules. Surveys, interviews, focus groups, and direct work observations will need to accommodate participants who work multiple shifts or swing and back shifts, staggering schedules for external assessors and the organization's POCs. Also, the external assessors or the assessed organization may have limits on the number of hours to be worked in a day or per week for safety or other reasons.

Manage Physical Security and Site Access

Physical security and site access requirements vary widely depending on the mission of the assessed organization. For instance, National Nuclear Security Administration or the DOE Office of Environmental Management may have secure sites in geographically isolated areas with security checkpoints or clearance requirements, while DOE Office of Science laboratories may have open-access college campus type designs in urban areas. Site access includes the following logistics:

- Badging requirements are the first hurdle for site access. While external assessors with HSPD-12 badges have site access to DOE sites, individual organizations may have additional or more stringent security requirements. Contact the local badging office or the safeguards and security support POC to verify requirements, including any training, necessary for on-site access. Additional protocols (e.g., hosting and escorting, sharing classified information, transferring technical information, or sharing Export Controlled Information) are required for external assessors who are foreign nationals.
- Hosting and escorting requirements and needs vary. It may be desirable to provide escorts (or drivers) even if not required to ensure that external assessors are able to maintain their assessment schedule, especially if a site has a large or complex footprint. Conversely, if the external assessors have a dedicated set of meeting rooms or an operations room that are public access areas, they may not want or need escorts.
- Identify areas with special restrictions (e.g., radiological zones, active construction sites, or limited access areas), and discuss with the assessment team to decide whether they want or need access to these areas.

Regardless of whether an escort is required or optional, the external assessors should be assigned specific POCs for emergency notifications (e.g., fire alarm or weather event) and given relevant information (e.g., evacuation or shelter-in-place protocols).

Manage Cybersecurity Requirements

Cybersecurity requirements and protocols vary widely based on mission contract requirements and site setup. Ensure that the external assessment team knows what IT will be available, especially before physically arriving at the site. This includes wired and wireless network access, and limitations on the types of devices that can be used and in what manner (e.g., not taking pictures with personal devices, and not using Bluetooth, infrared, and similar technologies including smart watches in secure areas). Another consideration is whether the external Identify any cybersecurity restrictions that will limit an assessment, including Wi-Fi and cellular coverage availability. Also determine whether navigation software will work, and adjust accordingly (e.g., provide physical maps if navigation software will not work at the site).

assessors and assessed organization will be using government issued or personal devices. Two factor authentication and "apps" may be a challenge for employees without a work-issued cellphone. This is especially pertinent to data transfer.

Provide Visitor Information

While not required, it is helpful to provide the following additional information to the external assessors:

- Provide hard copy packets with a minimum of basic information to the external assessment team, including site maps and security protocols, lists of POCs for various topics and their contact information, and schedules, for easy reference. This may include occupational medical or external medical providers, depending on the site.
- Describe dress code norms. For offices preferring business casual apparel, differentiate between business casual for an east coast office or a west coast office.
- Identify PPE requirements (e.g., only closed-toe shoes, steel-toed shoes, or loose-fitting clothing and hoody restrictions) for active construction, research, or nuclear work sites, and who will be providing the PPE for the external assessors. Also, some sites require jeans, long sleeves and/or high visibility over the shoulder shirts, and/or sturdy footwear for office attire. Additionally, some federal employees are not allowed to wear contractor-branded PPE during external assessments to avoid misrepresenting their affiliation, which means contractors may be unable to provide PPE to assessors who have forgotten to (or were unaware they needed to) bring their own.
- Provide options for local food vendors, including on-site and delivery options. Select vendors that can accommodate dietary restrictions.

See Appendix B for a sample logistics checklist that can be adapted for external assessment support planning.

TOPIC 4. DOCUMENT REQUESTS

Most external assessments include a document review component, and document requests (also referred to as data calls) often require dedicated support, software, and adherence to multiple processes to ensure access for the assessors while avoiding unintentional public release.

Note: Some sites require a nondisclosure agreement to review internal documents. Plan time for legal representatives from both the assessed organization and the external assessors' organization to review any such requirements.

Track Document Requests

To streamline responses to external assessor requests for documents and ensure that the correct information is furnished, it is a good practice to create an index or crosswalk. This will provide context for how the assessed organization describes the requested documents and their content, which may be useful in interviews. Specific POCs should be established to support document requests as a part of logistics.

Appendix C provides a sample crosswalk of terminology, document titles, and the associated safety culture concept for each requested item in a data call. Including a short description of the intended implementation and audience, and any specialized terms or acronyms may be helpful too. This indexing tool could also capture how and when the materials were provided to the external assessors, who provided the materials, who received the materials; where the materials are stored if using a collaboration tool to share information (e.g., Teams or SharePoint), the document's author or owner, and the organizational unit responsible for each requested data call item.

Define Terminology and Acronyms

Providing the external assessment team with a listing of any specialized terminology and acronyms that are not otherwise captured in an indexing document is another good idea. As an example, if an organization uses the Safe Conduct of Research principles as well as DOE G 450.4-1C, *Integrated Safety Management System Guide*, Attachment 10, "Safety Culture Focus Areas and Associated Attributes," then a crosswalk of terms and associated documents would define the language used by the assessed organization.

Leverage the Integrated Safety Management System Description

The integrated safety management (ISM) system description and similar documents that describe safety culture concept implementation (e.g., ISM guiding principles, ISM core functions, and safety culture focus areas and their associated attributes) can be used to prepare for anticipated data calls. For example, a crosswalk can be created for the ISM description, core function, and VPP tenet to pre-populate a VPP document request index. See Appendix C for a crosswalk between ISM guiding principles and core functions, VPP tenets, environmental management system elements, and safety culture focus areas and their associated attributes.

Determine Document Sharing Limitations

Identify both document requests and potential limitations (e.g., requirements to approve documents for public before sharing them with external assessors) as early as possible to provide adequate time

to compile documents for review. The logistics POC may be able to leverage program and process SMEs to gather documents and verify what, if anything, has been made available to external parties during previous assessments or benchmarking activities (e.g., to avoid duplication of effort and assure alignment).

Documents should also be reviewed to ensure that they are marked properly (e.g., Controlled Unclassified Information, Proprietary, or Business Sensitive) and evaluated to see whether they are appropriate to share (e.g., do the external assessors have a need to know, are the documents approved for public release, or do the documents contain personally identifiable information?). The logistics POC may need to meet with classification officers, legal counsel, security personnel, and external release process SMEs to review requirements applicable to the external assessment team's document requests.

Depending on cybersecurity restrictions, it may be easier to review some documents on-site (see "Manage Cybersecurity Requirements").

Share Documents

The external assessors or the assessed organization may have their own file sharing or collaboration tool (e.g., Microsoft OneDrive, SharePoint, Teams, or Box cloud storage) to share documents. While the benefits include bypassing printing costs, avoiding tracking multiple emails, and being able to share large files, cybersecurity, need-to-know, public release, and other considerations need to be addressed prior to populating documents in the chosen tool. Most file sharing locations and collaboration tools have unique security requirements and configurations. This introduces access administrative and logistics challenges such as multifactor authentication (e.g., requiring codes to be sent via cell phone to log in). While it may be difficult to obtain network access for external assessors, it may be worth it depending on document restrictions (e.g., the expectation that all documents be put through a public release process).

Note: a hyperlinked index may be beneficial but is highly dependent on the file sharing platform and access rights of the external assessors.

TOPIC 5. INTERVIEWS

An important point to determine early in planning is whether the external assessors or the assessed organization will determine who is interviewed. Regardless, the process by which interviewees are selected and scheduled should be communicated to all concerned.

Identify Interviewee Sampling Method

External assessor strategies for interviews will be either targeted or random, focusing on work scope, responsibilities, individual interviewe expertise, or overall population sampling. Regardless of interview strategy, logistics support includes the following:

- Targeted interviews necessitate a list of specific topics to identify interviewees; if topics are known in advance, a corresponding list of SMEs or others associated with the topics may be prepared ahead of the visit. This can be especially useful if a given SME has multiple areas of responsibility (e.g., a lockout/tagout SME who also manages the PPE program). Merging interviews or just knowing in advance how many times a given SME will be interviewed aids in scheduling.
- Random interview selection and scheduling can be based on a random stratified sampling (e.g., 10 percent of each department or work group), truly random sampling (e.g., 10 percent of the overall population), or ad hoc man-on-the-street interviews based on physical availability.

Random stratified sampling will require access to the internal organization's HRIS and a human resources POC during assessment planning to advise best methods and limitations to retrieve and share the data. If HRIS data are not accessible and the assessed organization has a full organizational chart (i.e., including all employees, not just leadership), the organizational chart can be used to identify interviewees.

If the interviews are intended to be ad hoc or the total percentage of employees being interviewed is the only consideration, the external assessors will need the overall site work schedule to avoid scheduling interviews during breaks or before or after work hours (especially with bargaining unit workers), and it may be permissible to allow supervisors to identify interviewees based on scheduled work and workload. See "Schedule Meetings and Interviews."

Identify Interviewees and Communicate Expectations

Once sampling has been determined and a list of interviewees is generated, identified and potential interviewees should receive communications regarding the assessment and any expectations – interviewees may also request copies of interview questions or lines of inquiry.

Logistics support for interviews includes administrative support (see Topic 3, "Logistics") to schedule interviews and quickly react to rescheduling requests or other changes (e.g., scheduled interviewee absences).

Organizations with a large union or bargaining unit population will have designated stewards, whom employees may request to be present during interviews. Time charging should be established in advance. Employees should not be expected to participate on their own time, and charge codes may need to be provided to ensure equal opportunity to participate.

Employees who may be impacted by the external assessment, including interviewees, should receive communications before the assessment, ideally through multiple avenues; see Topic 1, "Communications," for more information. Suggested information to share includes:

- Assessment scope, purpose, and duration
- Interviewee expectations (e.g., those invited will attend interviews) and interview preparedness, including knowing who to notify if unable to attend an interview and knowing limitations on sharing documents as well as knowing who to contact to clear documents for release.

Providing information about the purpose of the interviews and an overview of the assessment can improve attendance, as can providing a virtual interview option for those employees who have access to work computer systems.

Ensure Interview Privacy

The physical location for interviews should also be considered. Hard-walled offices should be used for interviews (though if interviewees have their own dedicated offices, it may be convenient to hold interviews there). An interview schedule can help with planning space allotment and booking. If interviewees work in an open-concept office building (e.g., in cube farms or bullpens), interviews should not be held there. If external assessors plan to conduct group interviews or focus groups, larger rooms will need to be booked and should be conference rooms (not lunchrooms, break rooms, or other high-traffic open access areas). See Topic 5, "Interviews" for more information.

TOPIC 6. FOLLOW-UP AND CLOSE-OUT

After the assessment data have been collected, there will likely be a report out of initial results. In addition, a final report will be compiled, and a factual accuracy review will be conducted. While the assessed organization generally does not help to produce the report, the external assessors will continue to work with the internal organization's POCs and SMEs to review the draft report and ensure an accurate final report. This may include periodic meetings with the SMEs and POCs after the on-site portion of the assessment is concluded.

Note: if the assessment or evaluation is the product of a subcontracted external entity, the factual accuracy review process and other close out activities, including information on good performance or practices, can be included in the initial contract deliverables.

Check Facts and Develop a Report

For an assessment to be effective, the final report should be factual, the results repeatable, and the recommendations actionable; communication during the drafting and finalization of the report between both the assessors and the assessed organization is key. To ensure factual accuracy, there should be clear delineation between requirements, findings (i.e., violations of requirements), and opportunities for improvement. If the external assessors use terminology that is different from that used by the assessed organization (e.g., referring to judgments of need instead of opportunities for improvement or deficiencies instead of findings), this should be communicated to the assessed organization to assist in addressing the results (see Topic 4, "Define Terminology and Acronyms").

Disposition Results

Any expectations for tracking and dispositioning results should be discussed. Considerations include:

- Will the report capture issues that were closed on the spot, or will they be addressed in an issues management system?
- If corrective actions are entered in the internal organization's system, are they to be dispositioned by a certain time date (e.g., before the next assessment occurs)?
- Is inclusion in a corrective action system undesirable (e.g., including culture issues in the system has been discouraged historically due to the challenge of timely and measurable closure)?

Likewise, if the external assessment is a recurring review, discuss any expectations for follow-up activities (other than addressing issues and opportunities for improvement) between closeout of the current assessment and initiation of the next assessment (e.g., capturing lessons learned or best practices). See Topic 1, "Communications," for more information about sharing assessment results and any follow-up actions with all employees.

Appendix A. Assessment Process

A sample assessment process is presented in Figure A-1.

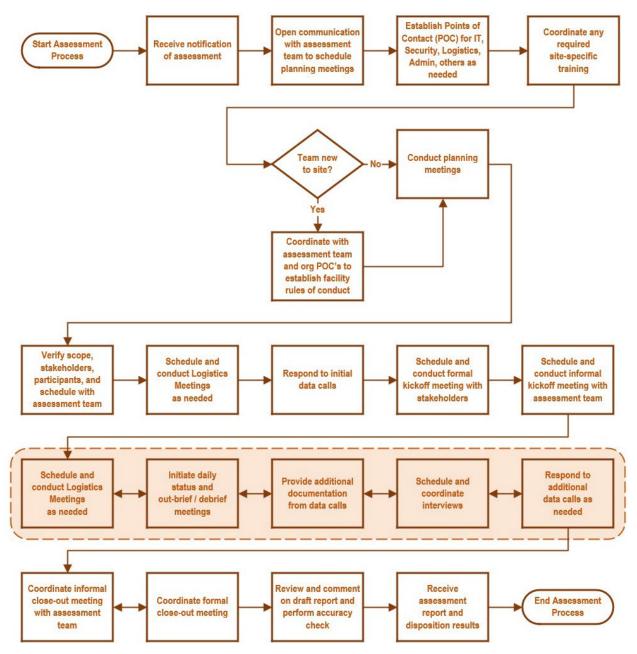


Figure A-1. High-level assessment process flow chart

Appendix B. Logistics Templates

Table B-1 presents a sample logistics checklist; organizations are encouraged to adapt and develop their own logistics checklists with the topics and level of specificity required. Table B-2 presents a sample document request tracking sheet.

| Table B-1. Assessment logistics checklist | template |
|---|----------|
| | |

| Action | POC | Y/N/NA |
|--|-----|--------|
| Have head count, demographics, and HRIS data been provided? | | |
| Has an organization chart been provided? | | |
| Have alternative shifts (e.g., night, swing, or backshifts) been accounted for in sampling and schedule planning? | | |
| Have site maps been provided? | | |
| Have SME and emergency contacts been provided? | | |
| Have badges been provided? | | |
| Are any assessors foreign nationals? | | |
| Have any required trainings been provided and completed by external assessors and/or hosts and escorts? | | |
| Have escorts been assigned and scheduled? | | |
| Are there special access considerations (e.g., construction, radiological, or limited access)? | | |
| Have dedicated workspaces been assigned? | | |
| Has Wi-Fi and local area network access been provided? | | |
| Have device limitations (e.g., no photos to be taken on personal devices or no smart devices in some areas) been communicated? | | |
| Have limitations on data transfer been addressed? | | |
| Have dress norms and PPE been reviewed and provided if needed? | | |
| Have interviews, focus groups, walk downs, and observations been scheduled? | | |
| Have other considerations such as food options been provided? | | |
| Have communications about the assessment purpose, duration, etc. gone to the assessed organization's employees? | | |
| Have communications about the assessment purpose and support expectations gone to the assessed organization's management? | | |
| Has a virtual or onsite in-brief been scheduled between the assessment team and the assessed organization's leadership? | | |

Table B-2. Document request tracking sheet template; as with the logistics checklist, organizations are encouraged to adapt the tracking sheet to their needs, including date columns, requestor columns, etc. as appropriate.

| Requested Document | Terminology Guide and Translation | Document Number and Title | Associated Voluntary Protection Program, Integrated Management System, Environmental Management System, and Safety Culture Concept |
|---|--|---|--|
| (Example: Issue management procedure) | is called is called here (Example: Issues are called condition reports and the issues management system is called DevonWay) | (List document numbers and titles here as they appear in the file name. Example: 1234-XYZ-789 Rev2, Condition Reporting) | (Example: questioning attitude) |
| | | | |
| | | | |
| | | | |

Appendix C. Safety Culture Concept Crosswalk Examples

The crosswalks in Table C-1 and Table C-2 simplify document retrieval for safety culture-related assessment lines of inquiry.

Table C-1. ISMS core functions, environmental management system elements, and VPP elements crosswalk

| Integrated Safety Management System Core Functions | Environmental Management System Elements | Voluntary Protection Program Elements |
|--|---|--|
| 1. Define the scope of work | 1. Establish environmental policy | |
| | 2. Planning | |
| 2. Identify and analyze hazards and environmental impacts | | 3. Worksite analysis |
| 3. Develop and implement hazard and environmental controls | 3. Implementation and operations | 4. Hazard prevention and control |
| 4. Perform work within controls | | |
| 5. Provide feedback and | 4. Checking | All five elements |
| continuous improvement | 5. Management review | |

Note: Human Performance Improvement (HPI) (or Human and Organizational Performance (HOP)) and Conduct of Operations (ConOps) concepts and subfunctions, respectively, have some overlap with the Safety Culture, ISM, VPP, and EMS, but the structure is different enough to create challenges when attempting to compare them on a one-to-one basis.

Table C-2. ISMS guiding principles, environmental management system elements, VPP elements, safety culture, and Safe Conduct of Research crosswalk

| Integrated Safety Management System Guiding Principles | Environmental Management System Elements | Voluntary Protection Program Elements | Safety Culture Focus Area and Associated Attribute | Safe Conduct of Research* |
|--|---|--|--|---|
| 1. Line management responsibility | | 1. Management leadership | Focus area: Leadership Attribute 1: Demonstrated safety leadership | Principle 2: Leaders value the safety legacy they create in their discipline |
| | | | Focus area: Leadership Attribute 2: Risk- informed, conservative decision making | Principle 2: Leaders value the safety legacy they create in their discipline |
| | | | Focus area: Leadership Attribute 3: Management engagement and time in field | Principle 4: A healthy respect is maintained for what can go wrong |
| | | | | Principle 7: Hazards are identified and evaluated for every task, every time |
| 2. Clear roles and responsibilities | | 2.Employee involvement | Focus area: Leadership Attribute 6: Clear expectations and accountability | Principle 2: Leaders value the safety legacy they create in their discipline |
| | | | Focus area: Leadership Attribute 5: Open communication and fostering an environment free from retribution | Principle 3: Staff raise safety concerns because trust permeates the organization |
| | | | Focus area: Employee/worker engagement Attribute 8: Teamwork and mutual respect | Principle 5: A questioning attitude is cultivated |
| | | | Focus area: Employee/worker engagement Attribute 7: Personal commitment to everyone's safety | Principle 1: Everyone is personally responsible for ensuring safe operations |

| Integrated Safety Management System Guiding Principles | Environmental Management System Elements | Voluntary Protection Program Elements | Safety Culture Focus Area and Associated Attribute | Safe Conduct of Research* |
|--|---|---|---|--|
| 3. Competence per responsibilities | | 5. Safety and health training | Focus area: Leadership Attribute 4: Staff recruitment, selection, retention, and development | Principle 2: Leaders value the safety legacy they create in their discipline |
| 4. Balanced priorities | 1. Establish environmental policy | | Focus area: Organizational learning Attribute 13: Performance monitoring through multiple means | Principle 6: Learning never stops |
| | 2. Planning | | Focus area: Employee/worker engagement Attribute 9: Participation in work planning and improvement | Principle 3: Cutting- edge science requires cutting-edge safety |
| | 3. Implementation and Operations | 3. Worksite Analysis 4. Hazard Prevention and Control 4. Hazard | Focus area: Organizational learning Attribute 15: Questioning attitude | Principle 5: A questioning attitude is cultivated |
| | | | Focus area: Employee/worker engagement Attribute 11: Credibility, trust, and reporting errors and problems | Principle 3: Staff raise safety concerns because trust permeates the organization |
| | | | Focus area: Employee/worker engagement Attribute 12 Effective resolution of reported problems | Principle 7: Hazards are identified for every task, every time |
| 6. Tailor hazard and environmental controls to work | 3. Implementation and Operations | Prevention and Control | Focus area: Employee/worker engagement Attribute 10: Mindful of hazards and controls | Principle 7: Hazards are identified and evaluated for every task, every time Principle 8: A healthy respect is maintained for what can go wrong |

| Integrated Safety Management System Guiding Principles | Environmental Management System Elements | Voluntary Protection Program Elements | Safety Culture Focus Area and Associated Attribute | Safe Conduct of Research* |
|--|---|--|---|--------------------------------------|
| 7. Operations (safety and environmental) authorization | | 3. Worksite Analysis | Focus area: Organizational learning Attribute13: Performance monitoring through multiple means | Principle 6: Learning never stops |
| | | | Focus area: Organizational learning Attribute14: Use of operational experience | |

*Used by Battelle-operated laboratories.

References and Further Reading

- Criteria Review and Approach Documents, National Nuclear Security Administration. NNSA develops and uses these documents primarily when performing biennial reviews.
- DOE G 226.1-2A, Federal Line Management Oversight of Department of Energy Nuclear Facilities. Appendix D, "Activity Level Work Planning and Control Criterion Review and Approach Documents with Lines of Inquiry"
- DOE G 414.1-1C, Management and Independent Assessments Guide
- <u>DOE P 450.4A, Chg. 1</u>., Integrated Safety Management Policy
- DOE G 450.4-1C, Integrated Safety Management System Guide
- DOE-HDBK-3027-99, Integrated Safety Management Systems (ISMS) Verification Team Leader's Handbook. This handbook, developed to provide guidance to the ISMS verification team leader and the verification team, includes recommended actions and procedures to help develop the skills and understanding necessary for effective membership on a verification team.
- DOE-STD-1232-2019, Volume 1, "U.S. Department of Energy Voluntary Protection Program– Program Structure," (Volume 1 of 4)
- DOE-STD-1232-2019, Volume 2, "U.S. Department of Energy Voluntary Protection Program– Procedures" (Volume 2 of 4)
- DOE-STD-1232-2019, Volume 3, "U.S. Department of Energy Voluntary Protection Program– Application" (Volume 3 of 4)
- DOE-STD-1232-2019, Volume 4, U.S. Department of Energy Voluntary Protection Program-Onsite Review" (Volume 4 of 4)
- Protocol EA-30-00, Rev. 6, "Office of Environment, Safety and Health Assessments Protocol for Oversight Activities"

DOE Office of Enterprise Assessments and Office of Environment, Health, Safety & Security Functional Area Criteria & Review Approach Documents are used to evaluate how requirements are met or for cross-cutting functional areas (e.g., conduct of operations and lessons learned).

- DOE Office of Enterprise Assessments, Criteria Review and Approach Documents
- DOE Office of Enterprise Assessments, Criteria and Review Approach Document List
- DOE Office of Environment, Health, Safety & Security, Facility Representative Program, Criteria & Review Approach Documents
- DOE Office of Environment, Health, Safety & Security, Functional Area Criteria & Review Approach Documents
- EA CRAD 30-01, Contractor Assurance System–Criteria and Review Approach Document
- EA CRAD 30-08, Safety Culture Assessment Criteria and Review Approach Document