

Attachment B
Management of Organizational Change
Date: June 15, 2011

**ATTACHMENT B:
AMERICAN CHEMISTRY COUNCIL'S (FORMERLY THE
CHEMICAL MANUFACTURING ASSOCIATION)**

**MANAGEMENT OF SAFETY AND HEALTH DURING
ORGANIZATIONAL CHANGE**

Management of Safety and Health During Organizational Change

**A Resource and Tool Kit for
Organizations Facing Change**

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CHEMICAL MANUFACTURERS ASSOCIATION (1998)

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FOREWORD AND DISCLAIMER

The guide is intended for the safety manager or professional familiar with safety and health management. It suggests a process that may be used to manage safety and health during organizational change, and provides sample worksheets and checklists as appendices. Although directed specifically to safety and health at the plant level, the concepts may also be adaptable to related areas such as environmental protection, quality assurance, occupational health, and more.

This guide is necessarily general in nature and leaves resolution of site-specific circumstances to the user. The samples and figures presented in this guide are intended to illustrate the principles discussed and represent only one option for managing safety and health during organizational change. **The guide is not intended to represent uniform or mandatory industry practice, and its use is purely voluntary.** Users of this guide have an independent obligation to ascertain that their actions comply with existing federal, state and local laws and regulations, and should consult with legal counsel concerning such matters. Users of this guide also have an independent obligation to ascertain that their actions represent sound practices, and should evaluate organizational change in light of the specific facts and circumstances of their particular case.

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INTRODUCTION

1.0 General

Change is an important and necessary part of a vital and growing organization, and many chemical plants are undergoing or contemplating significant organizational change. Such changes may be the result of redesign (re-engineering) of the workplace, new technology, downsizing, changing workforce, acquisitions, mergers, or regulations. Regardless of the cause, organizational change can cause permanent or transitory changes in work load, roles and responsibilities, and the manner in which work is done. Such changes can affect formal and informal work processes and the employees, with attendant stress on the organization. In addition, the organizational change may result in disruption of safety and health management, changes in available human and financial resources, reduction in experience levels, and revisions to safety-critical work processes. These factors could lead to inadvertent deterioration of safety and health performance.

“Process safety management of change” for operating facilities is now generally well-understood and work processes and procedures for evaluating such changes are widely used. However, the application of similar work processes for organizational change is not as well developed or widely used.

1.1 Objective

The resource and tool kit is intended for use by the safety and health professional or manager in a facility facing organizational change. It describes a process that may be used to plan for and manage safety and health during organizational change, and provides useful worksheets and checklists as appendices. The process in this guide is only one option for managing safety and health during organizational change. The process should be adapted as appropriate for the facility and can be integrated into any overall plant effort to plan and implement the change.

1.2 Potential Benefits

Without planning, significant organizational change may result in inadvertent lack of emphasis on safety and health management, the loss of established formal and informal safety processes, and deterioration of performance. With proper planning, safety and

health performance can be maintained, and the organizational change can even become an opportunity for improvement.

In addition to its intended purpose of assisting management of safety and health during specific organizational changes, the concepts and tools contained herein - once practiced - may become part of the plant's culture, just as management of other types of change is now well established.

SCOPE AND APPLICATION

2.0 General

This publication is intended for manufacturing facilities (plants) where significant organizational change may be pending or underway. It is primarily a planning tool, but may also be used to evaluate change already in progress. Although directed specifically to safety and health at the plant level, the concepts may also be adaptable to related areas such as environmental protection and quality assurance. With suitable adaptation, it may also have use in other parts of an organization.

2.1 Potentially Affected Positions and Work Processes

Depending on nature and scope of the organizational changes, a number of safety-critical positions may be affected. For example:

- Operator positions may be consolidated
- Self-directed work teams may be established
- Supervisory positions may be eliminated
- The span of control for supervisors or other managers may be increased
- Maintenance (craft) assignments may be revised, or multi-craft teams established
- Manager positions may be reduced and areas of responsibility changed
- Technical and quality assurance assignments may be revised
- Safety and health positions may be eliminated

As a result, many traditional roles and responsibilities may change, affecting the manner in which work is done, by whom, and the system of checks and balances that have evolved within a plant's culture. These changes in roles and responsibilities may affect formal and informal work processes and procedures, such as:

- Safety and health management systems
- Operating procedures
- Safe work authorization and permitting
- Special work authorizations (hot work, confined space, lockout/tagout, hot tapping, flare entry)
- Safety and health training needed or delivered
- Emergency response capability
- Undocumented or informal safety cultures, practices, and norms

The above lists illustrate some potential areas of concern and are not meant to be inclusive.

2.2 Relationship to Overall Plant Effort

In many cases, a special plantwide effort may be underway to plan and implement the organizational changes being contemplated. Managing safety and health should be considered as an integral part of that effort. This resource and tool kit is intended for the safety and health manager or professional (hereinafter “safety liaison”) who should be an integral part of the overall “change team.” Depending on the scope and nature of the change, the application or use of the materials in this publication may also involve other plant personnel.

2.3 Adapting to Specific Needs or Limited Scope

The scope and nature of organizational change being contemplated can vary significantly. For example, in some cases the organizational change may be limited to specific departments, or otherwise limited in scope and potential safety and health impacts. While the process and tools provided were designed with significant or plantwide changes in mind, they may also be useful for changes of limited scope. The process and tools suggested in this publication may be adapted as appropriate to the need.

A PROCESS FOR MANAGING SAFETY AND HEALTH DURING ORGANIZATIONAL CHANGE

3.0 General

The overall process for managing safety and health during organizational change consists of three broad areas of activity. These are:

- Understanding the change
- Planning for the change
- Implementation and monitoring

A more detailed eight-step process is outlined. The steps are described below, and shown in Figure 1. In addition, sample worksheets and checklists are provided in the appendices. The process described in this guide is only one option for managing potential impacts to safety and health during organizational change. The steps, figure, sample worksheets and sample checklists are not intended to represent uniform industry practices. Rather, they are intended to illustrate the principles discussed in the example framework provided in this guide.

3.1 Understanding the Organizational Change

The first step in managing safety and health during organizational change is to understand the nature and scope of the pending change. One starting point may be to obtain management direction and input on the purpose, scope and potential timing of the change. A next step is to confer with the plant “change team” to obtain its input. In some cases, a single meeting between management, the “change team” and the safety liaison may be preferred.

Using this input and working as part of the overall plant “change team,” the plant safety liaison should consider characterizing the planned changes by establishing a written description of the purpose and scope of the change, the potentially affected positions and work processes, and the timing. Understanding the organizational change is fundamental to anticipating possible problems and safety improvement opportunities. The written description can also be used to promote communication and common understanding between the overall “change team” and the safety liaison.

It is also likely that the plant’s vision of the organizational changes may continue to evolve while the process of evaluating safety-related aspects of the change is underway

(i.e., the change may be a moving target). Any written description can be updated as appropriate as the planned changes evolve.

The first page of the sample worksheet *Understanding the Organizational Change* (Appendix A) is intended to help the safety liaison and the plant “change team” understand and communicate the nature and scope of the pending change.

3.2 Identifying Potential Safety and Health Impacts (Screening)

Next, the facility can determine the personnel (positions) affected by the change and consider performing a preliminary screening to identify the affected work processes, prioritizing the importance of each. This suggests a systematic approach to consider the effects of the change on all aspects of safety and health, aided by an inventory checklist. This step produces a “going-in” assessment of the potential safety and health impacts of the organizational change. This assessment can help to identify the most important concerns and the areas where more detailed evaluation using the other worksheets and checklists may be appropriate. Pages 2-3 of the sample worksheet *Understanding the Organizational Change* (Appendix A) can assist this process. A simple “high-medium-low” prioritizing system can be used to set priorities.

Good documentation skills should be used in creating documents of this nature and appropriate personnel should be involved to approve the document as final. The emerging Appendix A worksheet should be reviewed with the “change team” and management as appropriate. In addition, involvement of other appropriate functions or disciplines, including legal, is critical prior to completion. When completed, the Appendix A worksheet may be used to summarize a common front-end vision of the safety and health aspects of the organizational change.

Depending upon the nature and scope of the change, the Appendix A worksheet may be prepared by the safety liaison (for small changes), or completed by a group in a brainstorming session as appropriate. The group could be the plant’s “change team” or a special group assembled for the purpose, with representatives of various levels from affected departments (safety, operations, maintenance, etc.).

3.3 Integrating Safety and Health Management into the Organizational Change Design

As discussed, significant organizational change may be under the direction of a plantwide team established by and reporting to local management. Communications with employees regarding the planned changes and the process being used to manage the changes will likely be coordinated through this plantwide effort. Since concern for maintaining or improving safety and health during the change may be of interest to many,

consideration should be given to communicating the planned approach to safety and health as part of the overall dialogue or communication with the workforce.

3.4 Assessing Potential Safety and Health Impacts and Opportunities

The next step may be to assess the potential safety and health impacts and opportunities for improvement resulting from the change. Building upon step 3.2, the facility should consider performing a more detailed assessment. Again, any written assessment should be drafted in accordance with good documentation skills and should involve the appropriate functions including legal, prior to completion.

Depending upon nature and scope of the change, areas to be addressed may include, but are not limited to, the following:

- Safety and Health Management
- Safety and Health Training
- Safe Work Practices
- Process Safety Management (PSM) Elements
- Contractor Safety
- Emergency Response
- Safety and Health Regulatory Compliance
- Occupational Health
- Operations Safety Effectiveness
- Craft Safety Effectiveness

To assist assessment of safety and health impacts and opportunities, sample checklists for each of the above are provided in the *Safety and Health Checklists* (Appendix B). The appropriate portions of the Appendix B checklists could be completed by the safety liaison or by a special group assembled for this purpose, with representatives of various levels from affected departments. The safety liaison should consider adding to the checklists as appropriate for the facility.

In the course of completing the Appendix B checklists, it may become apparent that a more detailed analysis (exceeding the depth of the checklist) is needed, or additional safety-sensitive concerns may be identified for which no checklist is provided. In such cases, one approach is to assemble a team with the appropriate expertise to conduct a more in-depth review of the issue, functioning in a manner much like a process hazards analysis (PHA) team. For example, some aspects of work authorization and permitting may require input from a multidisciplinary team, exploring issues not reached by the questions on the sample checklist. As another example, craft safety effectiveness may require more detailed analysis, benefiting from the synergism of an appropriate team. A

sample generic worksheet for a more in-depth review is in the *General Purpose Worksheet* (Appendix C).

The completed worksheets can then be used to prepare a list of proposed actions to address any potential impacts as appropriate.

3.5 Developing an Action Plan and Monitoring

The Appendix worksheets and checklists described above are constructed in a manner to assist facilities in identifying potential concerns and listing possible actions. Using the completed worksheets, the safety liaison or team can prepare a proposed action plan. The safety liaison should consider reviewing the proposed actions with the plant “change team” and management, as appropriate. Agreed-upon actions can be assigned and target completion dates established.

Another planning step for consideration is monitoring the change process through the identification of leading safety and health indicators or key work processes and preparation of a plan for monitoring these during implementation of the change. For example, the change team may decide that work authorization and permitting and craft safety effectiveness should be monitored as important leading indicators of success or potential problems. The plan should incorporate monitoring such leading indicators. While this monitoring will be performed in Step 3.8, the monitoring protocol can be designed before implementing the change. The sample worksheet *Monitoring Implementation* (Appendix D) is a tool for planning the monitoring process.

The final action plan, consisting of agreed-upon actions and an approved plan for monitoring, is then ready for implementation.

3.6 Communicating the Plan

As a logical continuation of the workforce communication begun in step 3.3, the approved safety and health management action plan can be summarized and communicated to the workforce as appropriate. This communication can occur within the framework and tenor of other communications regarding the overall change or as a separate safety initiative to deal with the change. The potential benefits of an informed workforce include easier and faster implementation of the actions, familiarity with (and feedback on) the planned monitoring process, and even improved understanding and support for the change itself.

3.7 Assessing Readiness

Prior to implementing the change, the facility should consider conducting the equivalent of a “pre-startup safety review” to assess the state of readiness for the planned change. This review could address the status of the agreed-upon action items and the plan for monitoring the success of the change. Appropriate personnel, e.g., plant management, should review the state of readiness and give final approval to implement.

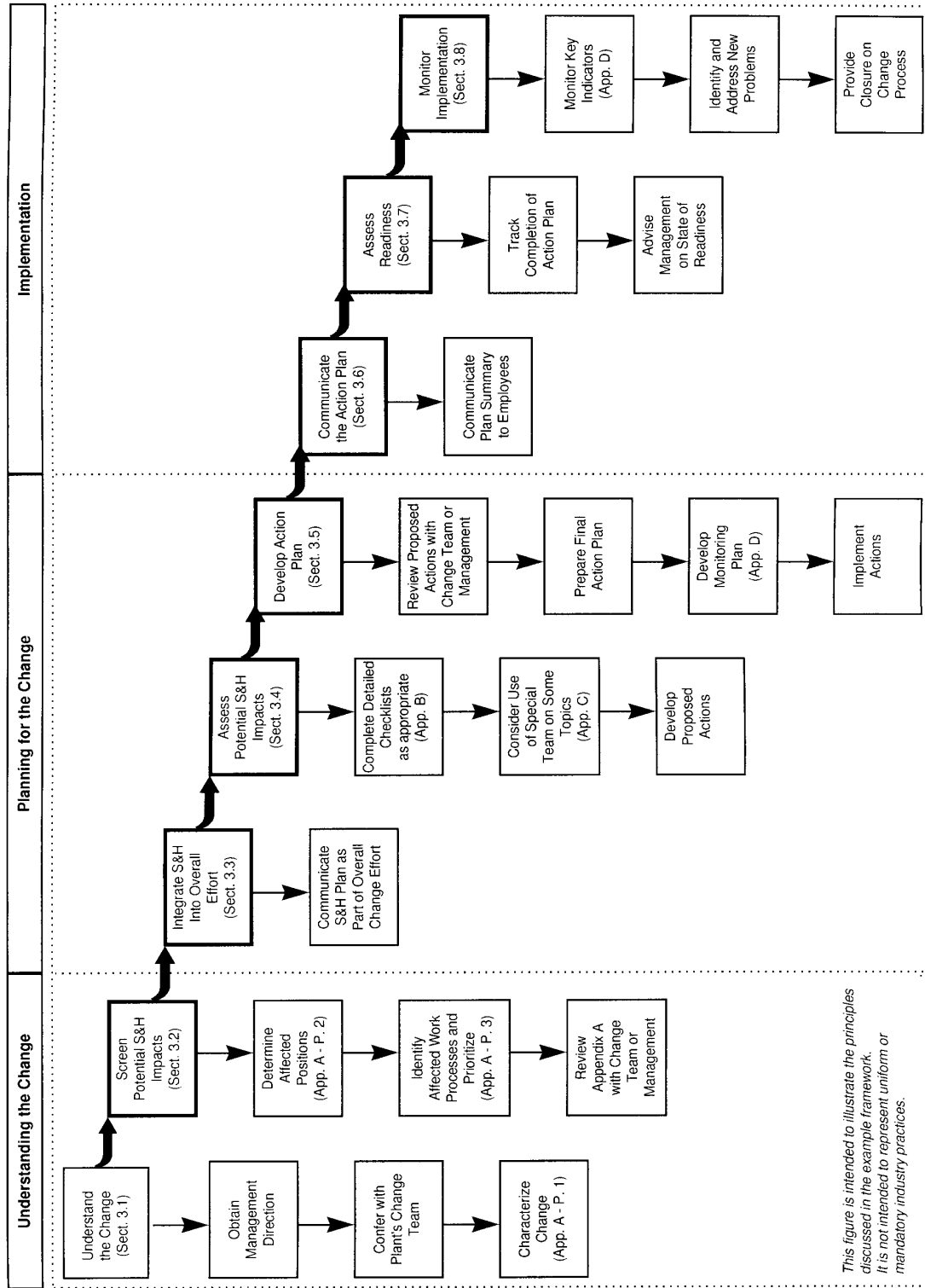
3.8 Monitoring Implementation

When the change has been initiated, the plan for monitoring implementation should be followed, as discussed in section 3.5.

New issues or concerns may become apparent during implementation, requiring additional action items or adjustments to the action plan. These should be addressed as they emerge to identify suitable actions.

It is important to reach an appropriate closure on the special effort to manage safety and health during organizational change and to consider communicating that closure to the workforce. This might entail a summary communication to employees regarding the lessons learned, new procedures or responsibilities which will become part of the culture, and actions still pending (if any).

FIGURE 1: Process for Managing Safety and Health During Organizational Change



Appendix A

Sample Worksheet

Understanding the Organizational Change

Appendix A contains sample worksheets. These samples are intended to serve as a tool for understanding the organizational change and identifying potential safety and health impacts. Users should adapt these worksheets to meet their particular needs. These samples are not intended to be all-inclusive.

The samples in this appendix are intended to illustrate the principles discussed and represent only one option for managing safety and health during organizational change. These samples are not intended to represent uniform or mandatory practices.

In addition, these worksheets should be drafted in accordance with good documentation skills. All appropriate functions or disciplines, including legal, should be involved prior to completion.

APPENDIX A

SAMPLE WORKSHEET -- UNDERSTANDING THE ORGANIZATIONAL CHANGE

Purpose: When used: Prepared by: Used by:	A tool for understanding the organizational change and identifying potential safety and health impacts (screening) In steps 3.1, Understanding the Organizational Change; and 3.2, Identifying Potential Safety and Health Impacts Safety liaison, or special multi-functional group created for the purpose Safety liaison or change team
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DESCRIPTION OF ORGANIZATIONAL CHANGE	
General Description of Organizational Change:	
Purpose of Change:	
Scope of Change:	
Timing:	

IDENTIFYING POTENTIAL SAFETY AND HEALTH IMPACTS - WORK PROCESS SCREENING		
Work or Process Affected	Potential Safety Impact	Priority2
Safety & Health Management		
Line mgmt. involvement		
Injury/illness recordkeeping		
Injury/illness investigation		
Departmental safety meetings		
Routine self safety audits/inspections		
Accident/incident reporting		
Safety suggestion systems		
Safety/Health committees		
Safety/Health performance appraisals		
Observation programs		
Enforcement & corrective action		
Safe Work Practices		
Work authorization (permitting)		
Confined space entry procedure		
Lockout/tagout procedure		
Hot work procedure		
Firewatch procedure		
Flare entry procedure		

2 Suggested three-tiered priority system H = high; M = medium; L = low

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IDENTIFYING POTENTIAL SAFETY AND HEALTH IMPACTS - WORK PROCESS SCREENING		
Work or Process Affected	Potential Safety Impact	Priority2
Other		
Safety & health training		
Process safety management		
Contractor safety		
Emergency response		
S & H regulatory compliance		
Occupational health program		
Operations safety effectiveness		
Craft safety effectiveness		

Appendix B

Sample Safety and Health Checklists

Appendix B contains sample checklists. These samples are intended to serve as a tool for assessing safety and health impacts of organizational change and identifying potential corrective actions. Users should adapt these checklists to meet their particular needs. These samples are not intended to be all-inclusive.

The samples in this appendix are intended to illustrate the principles discussed and represent only one option for managing safety and health during organizational change. These samples are not intended to represent uniform or mandatory practices.

In addition, these worksheets should be drafted in accordance with good documentation skills. All appropriate functions or disciplines, including legal, should be involved prior to completion. Facilities should also consider documenting resolution for each potential issue identified during the process. The resolution may be an action plan or the conclusion that no additional action is necessary.

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APPENDIX B SAMPLE CHECKLISTS

SAMPLE #1 HEALTH & SAFETY MANAGEMENT CHECKLIST					
Could The Change...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Affect the reality of line management commitment to safety?					
Affect the perception of line management commitment to safety?					
Affect the visibility of line management in the plant (i.e., walking the talk?)					
Affect accountability for safety?					
Require revision or consideration of the S&H Policy statement?					
Require revision of the safety manual(s) or booklet(s) for the facility?					
Require revision to safety awareness programs?					
Require changes in the manner in which departmental safety meetings are done?					
Require changes in the manner in which safety bulletins or periodical newsletters are prepared or issued?					
Require changes in the way that safety and health information is communicated?					
Affect the injury and illness reporting and investigation procedure?					

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SAMPLE #1 HEALTH & SAFETY MANAGEMENT CHECKLIST					
Could The Change...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Affect the involvement of direct supervision in the management of workplace injury and illness cases?					
Affect the manner in which safety performance data are collected, analyzed and reported?					
Affect the manner in which safety performance goals or targets are established?					
Require revisions to written role descriptions for managers, supervisors, technical staff, operators, maintenance crafts or other safety-critical personnel?					
Potentially affect the community?					
Necessitate discussions with the community about the change?					
Require changes in the way that drug and alcohol control policies are administered?					

SAMPLE #2 HEALTH & SAFETY TRAINING CHECKLIST					
Could The Change...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Require changes to the safety training programs for the plant as a whole?					
Require changes to the safety training materials (i.e., workbooks, videos, etc.) for the plant as a whole?					
Require changes to the safety training programs within departments ?					
Require changes to the safety training materials (i.e., workbooks, videos, etc.) within departments ?					
Require new or different instructors who must be trained?					
Result in changes in safety procedures which will require new or additional training?					
Require training of existing employees in procedures or practices that will be new to them?					
Require changes in "on-the-job" training?					
Affect "hands-on" application support?					
Result in changes in how the safety training recordkeeping system functions?					
Require special "one-time" training to implement the change?					

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SAMPLE #3 SAFE WORK PRACTICES CHECKLIST

Could The Change Require Changes In...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Procedures or personnel involved in removing equipment from service or preparing it for maintenance?					
Blinding or isolation procedures?					
Work authorization procedures?					
Vehicular entry procedures?					
Confined space entry procedure (see also S & H Regulations Checklist)					
Lockout/Tagout procedures ? (see also S & H Regulations Checklist)					
Hot work authorization procedures?					
Hot tap procedure?					
Fire watch procedures?					
Flare entry (opening) procedures?					
Temporary connection procedures?					
Periodic audits of equipment? (e.g., operator audits or verifications)					

SAMPLE #4 PROCESS SAFETY MANAGEMENT (PSM) CHECKLIST					
Could The Change Require Changes In...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Employee participation?					
Process safety information?					
Process hazard analyses?					
Operating procedures?					
Training?					
Contractors? (see also separate section)					
Pre-startup safety review?					
Mechanical integrity?					
Hot work permit?					
Management of change procedures?					
Incident investigation procedures?					
Emergency planning and response? (see also separate section)					
Compliance audits?					

SAMPLE #5 CONTRACTOR SAFETY CHECKLIST					
Could The Change Require Changes In ...	Yes/No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Persons responsible for implementing a contractor S&H program?					
New contractors in the plant?					
Types of work performed by contractors?					
Contractor pre-qualification procedures?					
Owner's S&H requirements for contractors?					
Owner's pre-bid package for contractors?					
Contractor selection process?					
Pre-job activities?					
Contractor S&H statistical reporting?					
Inspections and audits of contractor work in progress?					
Investigation of contractor incidents?					
Contractor emergency drills and exercises?					
Periodic evaluation of contractor's safety & health performance?					

SAMPLE #6 EMERGENCY RESPONSE CHECKLIST					
Could The Change Require Changes In ...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
The plant's written emergency response plans?					
The personnel who respond to emergencies as part of an organized response team?					
The personnel who respond to emergencies within a department?					
The plant's emergency alarm or notification system?					
The procedures for notifying off-duty personnel to respond to an emergency?					
The incident command system?					
Emergency response training?					
Personnel needing emergency response training?					
Compliance program or strategy for emergency response regulations? (see also S&H Regulatory Checklist)					

SAMPLE #7 SAFETY AND HEALTH REGULATORY COMPLIANCE CHECKLIST FOR SELECTED REGULATIONS						
Could The Change Require Changes In Compliance Programs For...	Yes/No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)	
OSHA (General)						
Injury/illness recordkeeping (29 CFR Part 1904)?						
Handling OSHA inspections?						
OSHA General Industry Work Practices						
Lockout/tagout (29 CFR 1910.147)?						
Confined space entry (29 CFR 1910.146)?						
Electrical safety - General Industry (29 CFR Subpart S)?						
Electrical safety - Special Industries (29 CFR 1910.269)?						
OSHA Emergency Response						
Emergency and fire prevention plans (29 CFR 1910.38)?						
Fire brigades (29 CFR 1910.156)?						
Hazardous waste operations and emergency response (Hazwoper) (29 CFR 1910.120)?						
Medical services and first aid (1910.151)?						

SAMPLE #7 SAFETY AND HEALTH REGULATORY COMPLIANCE CHECKLIST FOR SELECTED REGULATIONS						
Could The Change Require Changes In Compliance Programs For...	Yes/No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)	
OSHA PSM (see separate checklist)						
OSHA Other Selected Standards						
Scaffolds (29 CFR 1910.28 or 1926.450-454)?						
Powered industrial trucks (29 CFR 1910.178)?						
Excavation (29 CFR 1926 Subpart P)?						
OSHA Health Standards (selected)						
Hazard communication (29 CFR 1910.1200)?						
Personal protective equipment (29 CFR 1910 Subpart I)?						
Respiratory protection (29 CFR 1910.134)?						
Occupational noise exposure (29 CFR 1910.95)?						
Radiation (29 CFR 1910.96-97)?						
Asbestos (29 CFR 1910.1001 or 1926.1101)?						
Benzene (29 CFR 1910.1028)?						
Lead (29 CFR 1910.1025 or 1926.62)?						

SAMPLE #7 SAFETY AND HEALTH REGULATORY COMPLIANCE CHECKLIST FOR SELECTED REGULATIONS

Could The Change Require Changes In Compliance Programs For...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Access to employee exposure and medical records (29 CFR 1910.1020)?					
Bloodborne pathogens (29 CFR 1910.1030)?					
Other Regulatory					
TSCA 8(c) and 8(e) reporting?					
FIFRA 6(a)(2)?					

SAMPLE #8 OCCUPATIONAL HEALTH CHECKLIST					
Could The Change Require Changes In ...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
General					
Management of potential workplace illnesses?					
Administration of general medical examinations?					
Administration of OSHA-required medical examinations?					
Administration of OSHA health regulations?					
Exposure monitoring strategy?					
Handling employee complaints?					
Respiratory Protection (see also S&H Regulatory Checklist)					
Program administration?					
Persons subject to use of respirator?					
Fit testing program?					
Training?					
Selection and use?					
Cleaning, maintenance and repair?					

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SAMPLE #8 OCCUPATIONAL HEALTH CHECKLIST

Could The Change Require Changes In ...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Hearing Conservation and Noise (see also S&H Regulatory Checklist) Program administration?					
Persons subject to use of hearing protection?					
Audiometric testing & recording shifts?					
Training?					
Selection and use?					
Signage?					
Personal protective equipment (see also S&H Regulatory Checklist) Program administration?					
Persons subject to use of PPE?					
Selection criteria?					
Training?					

SAMPLE #8 OCCUPATIONAL HEALTH CHECKLIST

Could The Change Require Changes In ...	Yes/ No	Possible Effect	Action To Maintain Or Improve Safety	Action For	By (Date)
Hazard Communication (see S&H Regulatory Checklist)					
Chemical-Specific Standards (see S&H Regulatory Checklist)					
Heat stress					
Administration of program?					
Engineering controls					
Maintenance of ventilation systems?					
Ergonomics					
Administration of program?					

SAMPLE #9 OPERATIONS EFFECTIVENESS HEALTH & SAFETY CHECKLIST				
Factor or Issue of Concern	Yes/ No/ NA	Action item	By	Date
Planning and Participation				
Has a process been established to involve affected personnel in the safety and health considerations pertaining to the change?				
Should a special team be considered as one means to obtain employee participation and input?				
Should on-shift meetings be considered as one means of obtaining employee input, and assuring communication?				
Administrative Factors				
Are new lines of authority established and understood by all, particularly with regard to around-the-clock communications?				
Are procedures in place for decision making, particularly in off-hours?				
Have the procedures for calling out additional personnel been addressed?				

SAMPLE #9 OPERATIONS EFFECTIVENESS HEALTH & SAFETY CHECKLIST

Factor or Issue of Concern	Yes/ No/ NA	Action item	By	Date
Human Factors				
Will the responsible operator be able to monitor critical controls and alarms?				
Will the responsible operator be able to deal with the number of alarms associated with an upset or emergency?				
Will the responsible operator be able to monitor appropriately the number of control loops assigned?				
Are the roles, responsibilities and authorities of the board and field operators clear and concise?				
Are there procedures and equipment in place to promote clear communication between board and field operators?				
PHA Reviews				
Have the PHA reports been reviewed to identify events where safeguards include operator intervention and procedural activities involving operators?				
Are these safeguards still appropriate?				

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SAMPLE #9 OPERATIONS EFFECTIVENESS HEALTH & SAFETY CHECKLIST

Factor or Issue of Concern	Yes/ No/ NA	Action item	By	Date
Operating Procedures Have the operating procedures been revised to reflect the new assignments and duties, as appropriate?				
Do the procedures provide for safely conducting activities for each phase of operation? <ul style="list-style-type: none"> • Initial startup • Normal operations • Temporary operations • Emergency shutdown (more...) • Emergency operations • Normal shutdowns • Startup following turnaround or emergency shutdown 				
Are the procedures written such that staffing is appropriate for special tasks such as lighting furnaces, special line-ups and transfers, operator entry into confined spaces such as pits, or similar tasks where short-term assistance may be necessary?				
Are procedures in place for managing changes to operating procedures, particularly during off hours?				

SAMPLE #9 OPERATIONS EFFECTIVENESS HEALTH & SAFETY CHECKLIST

Factor or Issue of Concern	Yes/ No/ NA	Action item	By	Date
Emergency Procedures				
Can the operator(s) reasonably complete all tasks necessary to safely shutdown the process?				
Does the answer change if all instrumentation fails simultaneously?				
Are emergency valves, switches and shutdown devices accessible?				
Is staffing appropriate to make proper emergency communications (local and facility communications; affected units)?				
Does the operator have time to activate emergency systems such as manual sprinkler systems and fire water monitors?				
Are the number and location of emergency breathing apparatus appropriate for both board and field personnel?				
Does the change affect the make-up of the plant's emergency response teams or fire brigade?				
Are there procedures to address response to medical emergencies?				
Are there procedures for dealing with non-emergency injuries and illnesses?				

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SAMPLE #9 OPERATIONS EFFECTIVENESS HEALTH & SAFETY CHECKLIST

Factor or Issue of Concern	Yes/ No/ NA	Action item	By	Date
Training				
Are the employees affected by the change identified and informed of the changes?				
Are affected employees trained in the operating procedures as appropriate?				
Are affected employees trained on significant hazards (chemical and physical) and use of appropriate personal protective equipment (PPE) for their area/work responsibility?				
Are process managers and supervisors trained in the hazards of processes for which they are now responsible? Have they demonstrated proficiency and knowledge as appropriate?				
Is all training documented?				
Are plans in place for appropriate emergency drills, involving all affected operating personnel?				

SAMPLE #9 OPERATIONS EFFECTIVENESS HEALTH & SAFETY CHECKLIST			
Factor or Issue of Concern	Yes/ No/ NA	Action item	By Date
Process Safety Information (PSI) Did the change result in any modifications to PSI? <ul style="list-style-type: none"> • Chemical hazards • Process technology • Process equipment 			
Equipment changes Did the change result in modification to equipment? If Yes, is management of change process completed? Are the changes mechanically complete?			
Is a pre-startup safety review (PSSR) planned or complete?			

SAMPLE #10 CRAFT SAFETY EFFECTIVENESS CHECKLIST					
Could The Change Require Changes In ...	Yes/No	Possible Affect	Action To Maintain Or Improve Safety	Action For	By (Date)
The way in which work is assigned to crafts?					
Work authorization procedures (craft's perspective)					
The nature or type of work assigned to particular crafts?					
The amount of supervision provided?					
Technical or functional direction for crafts?					
The way in which persons within a craft work together?					
The way in which various crafts work together?					
Supervision of multi-craft tasks?					
Quality assurance of craft work?					
Skills required within a craft?					
Skill level within a craft?					
Training required within a craft?					
Informal or on-the-job training in safe work practices?					
Craft safety meetings?					

Appendix C

Sample General Purpose Worksheet

Appendix C contains a sample worksheet. This sample is intended to serve as a tool for a more detailed analysis of selected topics (exceeding the depth of the Appendix B checklists), or for assessing safety-sensitive concerns for which no checklist is provided. Users should adapt this worksheet to meet their particular needs. This sample is not intended to be all-inclusive.

The samples in this appendix are intended to illustrate the principles discussed and represent only one option for managing safety and health during organizational change. These samples are not intended to represent uniform or mandatory practices.

In addition, these worksheets should be drafted in accordance with good documentation skills. All appropriate functions or disciplines, including legal, should be involved prior to completion.

APPENDIX C

SAMPLE GENERAL PURPOSE WORKSHEET

Purpose:	A tool for reviewing additional potential safety and health impacts of organizational change
How used:	As a supplement to the specific checklists used to assess safety & health impacts and opportunities (Section 3.4)
Prepared by:	A special multi-disciplinary group created for the purpose
Used by:	Safety liaison or change team
Discussion	In the course of completing the specific checklists, it may become apparent that a more detailed analysis (exceeding the depth of the checklist) is needed, or additional safety-sensitive concerns may be identified for which no checklist is provided. In such cases, one approach is to assemble an appropriate team to conduct a hazard review of the issue, functioning in a manner much like a PHA team. This is a general purpose work sheet for that purpose, similar to a "what if" PHA worksheet. For example, it could be useful in assessing work authorization and permitting procedures.

GENERAL PURPOSE WORKSHEET			
What if...?	Potential Consequences	Existing Systems and Safeguards	Additional Considerations

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GENERAL PURPOSE WORKSHEET			
What if...?	Potential Consequences	Existing Systems and Safeguards	Additional Considerations