

CHAPTER 7: MANAGEMENT OF CHANGE FOR ORGANIZATIONAL CHANGES

Section 450-8.016(B)(v) of County Ordinance 98-48 requires stationary sources to conduct a Management of Change prior to staffing changes for changes in permanent staffing levels/reorganization in operations or emergency response. Employees and their representatives shall be consulted¹ in the Management of Change. The intent of this chapter is to identify those requirements that stationary sources must incorporate into their existing Management of Change procedure to satisfy these requirements. Stationary sources may elect to develop a separate MOC procedure for staffing changes. Primarily, this chapter details requirements for identifying the technical basis for the organizational change (Section 7.3) and for assessing the impact of the organizational change on safety and health (Section 7.4). It is not the intent of this chapter to address the general requirements of Management of Change specified in Section 450-8.016(A)(6). The requirements of this chapter apply to:

- Reduction in the number of positions, or number of personnel within those positions in operations, including engineers and supervisors with direct responsibilities in operations; positions with emergency response duties; and positions with safety responsibilities
- Substantive increase in the duties in operations, including engineers and supervisors with direct responsibilities in operations; positions with emergency response duties; and positions with safety responsibilities (e.g., addition of equipment or instrumentation which significantly adds to the complexity of the system)
- Changes in the responsibilities of positions in operations, including engineers and supervisors with direct responsibilities in operations; positions with emergency response duties; and positions with safety responsibilities

Each stationary source must develop criteria or guidance to assist appropriate personnel in determining “when” an MOC for an organizational change should be initiated.

The following process for managing organizational changes is based upon the method described in *Management of Safety and Health During Organizational Change*¹. Sample worksheets provided in this publication are included in Attachment B of this document. Stationary sources may also consider applying appropriate questions or indicators from Attachment A. Stationary sources electing to develop and implement programs other than those described in this chapter must consult with CCHS representatives.

7.1 FORMING A “CHANGE TEAM” OR “MOC TEAM”

The *Management of Safety and Health During Organizational Change* publication advocates the use of a “change team” or “MOC team” to scrutinize staffing changes. Stationary sources should consider the use of a “change team” or “MOC team” to satisfy the requirement that employees and their representatives be consulted in the Management

¹ The intent of consult is to exchange information, solicit input and participation from the employees and their representatives. It requires more than simply informing employees [Part 4, GISO Section 5189].

of Change. The “change team” or “MOC team” should include employees and their representatives, as appropriate, from engineering, maintenance, and operations as well as safety and health. Each stationary source must develop and disseminate criteria or guidance to assist personnel responsible for conducting the MOC in determining whether a team approach is appropriate and the composition of the team.

7.2 DEFINING THE EXISTING SITUATION AND IDENTIFYING AFFECTED AREAS

Stationary source representatives must clearly understand their existing situation (e.g., personnel, personnel responsibilities, program requirements) before they can thoroughly analyze the impact of the staffing change(s) on safety and health. Members of the “change team” or “MOC team” should consider developing checklists of general program requirements (safety and operational) that must be met. The following program requirements are examples that the stationary source may elect to consider:

- Safety Meetings
- Process Safety Management Programs
- Self Audits/Inspections
- Accident/Incident Reporting
- Safe Work Practices
- Health and Safety Training
- Contractor Safety
- Emergency Response
- Occupational Health Program
- Operations

Members of the “change team” or “MOC team” should also consider developing the specific tasks within each of the program requirements for which personnel are responsible (e.g., operations – correct staffing to handle the number of alarms associated with an upset or emergency; contractor safety – responsibility inspecting and auditing contractor work in progress). Additionally, stationary sources may elect to incorporate within the checklist “reminders” of the effects of the change(s) on procedures and training (e.g., could the organizational change require changes in personnel needing emergency response training).

Once the stationary source has clearly identified the existing situation, they should first identify all areas (e.g., programs, procedures, meetings, training) that could potentially be affected by the change, then focus the review on those areas with highest priority (i.e., not every identify change may warrant an extensive review). Members of the change team may elect to revise the checklists included in Attachment B of this document (Appendices A and B) to reflect conditions at their source.

7.3 DEVELOPING THE TECHNICAL BASIS FOR THE CHANGE

One or more members of the “change team” or “MOC team” must determine the purpose, scope, and schedule of the pending staffing change and the potentially affected positions. Members of the “change team” or MOC team” may elect to incorporate information from the worksheet in Attachment B (Appendix A). This information may be documented on the usual Management of Change form as the technical basis for the change.

7.4 ASSESSING THE IMPACT OF THE ORGANIZATIONAL CHANGE ON SAFETY AND HEALTH

Members of the “change team” or “MOC team” must assess the impact that the staffing change(s) will have on safety and health once they have clearly detailed their existing situation (e.g., program requirements, personnel tasks/responsibilities) and the reason for the organizational change. Members of the “change team” or “MOC team” should determine the potentially affected programs and tasks using the checklists/reminders developed in Section 7.2 (if available). Members of the “change team” or “MOC team” should also document the effects of the change and potential action items to mitigate the consequences of the change. Members of the “change team” or “MOC team” that are implementing the checklists developed in Section 7.2 should be encouraged to use the checklists to prompt discussion and brainstorming. It should not be used as an absolute.

Of primary importance during this phase of the MOC, is assessing the impact of the change on safety and health during “off hours” or during emergency situations (e.g., spills, fires, explosions, excursions). For example, the “change team” or “MOC team” may identify that the proposed organizational change will affect Operations. In particular, the personnel change will affect the number of operators available to bring the process to a safe state in an emergency situation. Another example is the addition of equipment that significantly adds to the complexity of the unit and requires additional resources to bring to a safe state during emergency situations. The “change team” or “MOC team” should then identify the consequences of the change and identify action items to mitigate the consequences if necessary.

Stationary sources that elected not to develop the checklists and stationary sources that want to perform a more detailed analysis than associated with the checklists may elect to conduct a modified PHA (e.g., What-If analysis) to analyze the potential impact of the change on safety and health. Members of the change team may elect to incorporate information from the worksheet shown in Attachment B (Appendix C). This information may be documented on the usual Management of Change form as the impact on safety and health.

7.5 COMPLETING THE MANAGEMENT OF CHANGE

The management of change procedure should be completed in accordance with Section 450-8.016(A)(6) following identification of the technical basis of the change (Section 7.3) and the potential impacts of the change (and suggested action items to mitigate the impacts) on safety and health (Section 7.4). Of particular importance, is to ensure that employees affected by a change are informed of, and trained in, the change prior to the change occurring. Also of particular importance, is to ensure that operating and emergency response procedures are updated accordingly. Stationary sources may elect to include these types of reminders in the checklists developed in Section 8.2 and implemented in Section 7.4 (e.g., is additional training required, does the change affect the procedures for notifying off-duty personnel during an emergency).

“Change team” or “MOC team” members should document the MOC process thoroughly, particularly when the management decision is inconsistent with the team findings (e.g., the MOC team concludes that removing a particular position could negatively impact safety and cannot be appropriately mitigated. Members of management feel that the negative impacts can be mitigated through certain corrective actions).

¹ CMA, Management of Safety and Health During Organizational Change (1998)