

Response to Issues Raised in the Lead Contact Brainstorm – 2/28/07
Issued May 1, 2007

The following issues were identified in need of clarification:

1. Would like to clarify the role of the Organization Team in the meetings, but not necessarily looking to have Leads run their own meeting.
See attachment.
2. Who the best person to go to for assistance in handling the workload crunch and/or prioritization. Is it the DD? Is it the STL? Is it Lou?
and
3. Who is best-equipped to help a LC resolve DLC issues, either with EHS Coordinators or management?

2 and 3

There are several options a Lead Contact can pursue. While the order below is desirable in a given circumstance several steps can be skipped:

- Start with your DD. They can then work with the Lead Contact, other DD's or the EHS Director to resolve an issue or determine the best approach.
 - The EHS Coordinator may also be able to help in some cases.
 - The EHS Director has ultimate responsibility.
 - The Organization Manager (Mitch Galanek) has a role if it pertains to organization issues.
 - The EHS ombudsperson (Joe Pinciario) can offer advice if confidentiality is desired. He can work with other DD's or the EHS Director in a manner to protect confidentiality.
4. Who really owns central oversight for DLC compliance with the EHS-MS and regulations?

Sounds trite but we all own responsibility for “oversight” of compliance with the EHS-MS. Ultimately, the DLCs are responsible for following the rules. The EHS Office has some specific regulatory roles it must perform (i.e. sampling, reporting, recordkeeping, etc) and a duty to monitor and report any issues of non-compliance to the Institute.

- The EHS Roles and Responsibility Database identifies a responsible person for each EHS program. That person and their DD has first line responsibility for the program and all its elements. This means they need to verify that the program requirements are being met. The delivery or implementation of the program requirements may be done by others, but all involved must agree and understand their role. As usual the relevant DD's and EHS Director can assist in final determinations.
- The Lead Contact and Coordinator has the next level of responsibility for oversight of the EHS issues within each DLC. This means they should be aware of the status of the relevant EHS programs and/or have assurance that someone (the Lead Contact, Coordinator, Representative, EHS office Member) is taking the appropriate actions.
- DD's, Service Team Leaders and EHS Director have ultimate oversight responsibilities.

- 5 Who is responsible for **following up on EHS Training compliance** – Lead Contacts versus Team Members when the EHS Coordinator isn't accomplishing the targeted goals for training?

Ultimately, the PI and supervisor of the DLC's are responsible. The EHS Organization (EHS Office & DLC's) has key roles. This is still being flushed out but it is likely this will vary from DLC to DLC and EHS Program to EHS Program.

- 6 What is the **priority of the Lead Contact work** versus program work and its importance in Performance Review?

Hopefully there will continue to be more of a merge between LC and Program work. The individual components should be addressed on a case by case basis. Generally, the relevant Deputy Director and Service Team Leader should help to determine priorities. The Director is consulted when conflicting priorities can't be easily resolved.

Clarification of Organization Team and Organization Manager (Mitch) Roles (Draft 3/20/07)

The Organization team was originally formed in 2002 to identify and develop the best way MIT should be organized for EHS issues. This led to the current structure of an EHS Representative for each PI with hazards, an EHS Coordinator for each DLC with hazards reporting to the DLC Head, an EHS Committee for each DLC and a Lead Contact from the EHS Office to form a partnership with the Coordinator. As this organization has evolved and matured the mission of the Organization Team has also changed. The MIT EHS Organization (EHS Office and DLC Structure) is now focusing on ways to sustain the EHS-MS and a clearer more efficient identification of roles and responsibilities for the various organization components (i.e. Lead Contacts, Coordinators, etc.). The Organization Team has evolved to meet these new challenges. **The current Team Leader is Joe Pinciario.**

The EHS Organization Team deals with people and has 2 main focuses. One is the EHS Office personnel and the other is all the other MIT personnel who have EHS roles (i.e. Coordinators, Reps, etc.). The duties, roles, responsibilities and authorities of the Organization Team are as follows:

- 1) Responsible for all aspects of the internal EHS Office organizational structure in conjunction with the EHS Director and EHS Deputy Directors
- 2) Identify and recommend to management opportunities to improve workload balance
- 3) Work with EHS staff to increase their capabilities / capacities to perform their duties
- 4) Address issues raised by EHS staff
- 5) Support EHS staff in their relationships / duties with the DLC's
- 6) Assist in building team cohesiveness
- 7) Monitors workload balance and reports recommendations to management
- 8) Manage development of Organization related process maps
- 9) Keeps EHS Director and EHS Deputy Directors informed of internal EHS Organizational matters
- 10) Identifies and recommends a) new Lead Contact skill sets and b) skill sets for new Lead Contacts
- 11) Authority to recommend to the EHS Director and EHS Deputy Directors matters related to the internal EHS Office organization
- 12) Authority to carry out EHS Office organization related directives as deputized by the EHS Director to do so.
- 13) Interface all EHS cross functional areas inclusive of Programs and Service Teams
- 14) Overlap EHS office Service teams and EHS Programs

The Team as a whole is primarily focusing on EHS Office personnel and our necessary skills and professional development.

It was felt one of the team members (currently Mitch Galanek) would be designated as Organization Manager with the responsibility for oversight of the organizational components of the EHS-MS. This involves verifying that the organizational components are in place and working smoothly and identifying opportunities for improvement. This is described in more detail as:

Components Include:

1. EHS Coordinators
 - a. Verify all appropriate DLC's have appointed coordinators.
 - b. Monitor effectiveness of coordinator.
 - c. Recommend changes to coordinator personnel/time, commitments/resources.

2. EHS Lead Contacts and EHS Teams
 - a. Verify all appropriate DLC's have assigned Lead Contacts and EHS Teams.
 - b. Monitor/evaluate effectiveness of LC's and EHS Team.
 - c. Recommend changes to LC's or EHS Team.

3. Coordinator-Lead Contact Partnership
 - a. Monitor/evaluate relationship and effectiveness.
 - b. Identify opportunities for improvement.

4. DLC EHS Committees and EHS Reps
 - a. Monitor activity

5. Coordinator/Lead Contact, Lead Contact, Working Committee Meetings
 - a. Monitor the effectiveness of these meetings.
 - b. Identify opportunities for improvement.
 - c. May lead these or delegate the lead.

Process for Oversight:

High level reviews of implementation and effectiveness based on results of various inputs, including DLC Assessment reports, surveys, observations at group meetings and feedback from organization. Can delegate responsibilities of specific tasks associated with the components listed above to others within EHS. For example WC can be lead / facilitated by Laurie Veal and/or others. Organization Manager monitors to see it is inclusive, effective, efficient and meeting our goals.

There will necessarily be some overlap with Mitch's focus and the Organization Team's focus – most notably in seeing that the EHS Office personnel have the ability and skills to perform the duties needed to sustain the EHS-MS.