Working Draft

ISSUES MATRICES PERTAINING TO THE REVIEW OF OCAS-PR-012, *WORKER OUTREACH PROGRAM*, AND ORAUT-PROC-0097, *CONDUCT OF THE WORKER OUTREACH PROGRAM PROCEDURE*

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Issues Matrix Pertaining to the Review of OCAS-PR-012, *Worker Outreach Program*, and ORAUT-PROC-0097, *Conduct of the Worker Outreach Program Procedure*

This latest revision of the OCAS-PR-012 issues matrix follows the format and issue numbering established in Revision 4 (SC&A 2012b), including a table of abbreviated summaries of issues and action items. Revision 4 incorporated all previously identified action items and commitments from previous issues matrices, DCAS formal written responses, and less formal venues, such as Work Group discussions (as documented by meeting transcripts) or e-mail communication. For each Finding or Observation, SC&A stated the original finding/observation from its *Review of OCAS-PR-012: Worker Outreach Program* (SC&A 2010a) and provided a brief summary of the Work Group resolution history, including a numbered list of "Work Group Recommended Action Items" and "Other Actions Proposed/Considered" (if applicable).

The final column of the matrix contains SC&A's assessment of the status of each action, which has been updated following Work Group meetings on August 29, 2012, and November 8, 2012. The most recent updates to matrix items are marked in blue font.

A revised draft of OCAS-PR-012 (OCAS 2012c) was reviewed at the November 8, 2012, Work Group meeting. All findings specific to the procedure have been resolved to the Work Group's satisfaction.

Three issues remain in progress at this time: Finding 3, Finding 4, and Observation 3. None of these issues impact the revision and issuance of OCAS-PR-012.

Review of OCAS-PR-012 and Legacy Issues from ORAUT-PROC-0097

No.	ISSUE STATUS[1]	SC&A Summary of Work Group Resolution History	SC&A Assessment of Status
OCAS-PR-012 FINDINGS			
F1.	**The procedure does not provide direction for tracking, trending, evaluating, or responding to worker input.** *CLOSED*	SC&A found the absence of direction for effective documentation, evaluation, and response to worker comments to be a weakness in programmatic guidance that may impair effectiveness of worker outreach. Specific concerns discussed include: • Minutes or notes of information-gathering meetings (e.g., Outreach and SEC Focus Groups) • Capture of substantive comments from information-giving or giving/gathering meetings (e.g., workshops, town hall meetings) • Tracking of comment resolution and trending of recurrent issues • Scarcity of Action Items in Outreach Tracking System (OTS) database • Functional integration of worker outreach process with site profile and SEC evaluation procedures to assure that substantive worker information is considered in the development of technical work documents NIOSH clarified that OCAS-PR-012 is a tool in support of outreach meetings; it is not intended to address the broad range of activities in which NIOSH participates. The various communication techniques are so diverse that it is difficult to proceduralize them in one procedure. Disposition of worker input is identified and tracked through the Action Item application in the OTS. Trending and tracking can be performed on just about any field in the OTS, in particular the Action Item screen. Information placed into the OTS "Meeting Files" is placed into the Site Research Database (SRDB). **Work Group Recommended Action Items** **NIOSH:** (1) Add guidance in OCAS-PR-012 to identify the types of events for which	**General Observation**: The majority of NIOSH changes have been made to supporting sections of the PR-012 procedural document (e.g., General, Scope, References, Appendices), whose relationship with Section 6 ("Procedure") is unclear. The Work Group should clarify what parts of PR-012 are "actionable," i.e., required for staff implementation, and how they will be implemented. **August 29, 2012, Action Item for NIOSH:** Add references where applicable to integrate appendices into procedure. **Update Sept. 2012:** SC&A noted that the revised procedure successfully integrates the appendices into the body of the procedure. *Complete.* **Work Group Recommended Action Items** **NIOSH:** (1) OCAS 2012a, Section 5.0 (pp. 4–5):

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[1] Original SC&A review finding (SC&A 2010a) with current Work Group status.

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		meeting minutes will be taken. [October 20, 2010]	Focus Groups: "Minutes are typically taken, but notes may be taken for smaller groups (or one-on-one) and/or if classified/sensitive material is to be discussed."
			Town Hall: "Minutes of the meeting will be taken."
			SEC Outreach and other meetings (e.g., workshops, DOE & DOL meetings): Minutes are not taken.
			Appendix F (p. 29) lists minutes as likely documents for SEC Outreach and Town Hall meetings; meeting notes as likely for Focus Groups.
			Update Sept. 2012: Revised descriptions of focus group meetings clearly state, "A written record of the meeting will be generated" (OCAS 2012b, pg. 5). *Complete*
		(2) Reference, as appropriate, DCAS procedures. [October 20, 2010]	(2) References to OCAS-PLCY-0001 (OCAS 2009a), OCAS-PR-010 (OCAS 2009b), and OCAS-PR-011 (OCAS 2009c) have been added to Section 3.0 of OCAS-PR-012. *Complete.*
		(3) Develop appropriate wording characterizing the requirements to capture worker input from information gathering meetings. [December 16, 2010]	(3) Work Group meeting transcript indicates that the procedure should clearly require an accurate account of the substantive issues discussed, regardless of whether the format is minutes or notes (ABRWH

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			2010a, pp. 167–170). The wording used for focus groups (quoted in Item 1 above) still lacks a clear statement of this expectation.
			Update Sept. 2012: See action item (1) above. ***Complete***
		(4) Evaluate the OTS and WISPR database compatibility to determine if comments/action items from WISPR can be added to OTS. [December 16, 2010]	(4) NIOSH transfer of WISPR data to OTS was in progress as of the June 29, 2011 Work Group meeting (ABRWH 2011).
			Update Sept. 2012: At the August 2012 Work Group meeting, NIOSH indicated the transfer of items from WISPR to OTS is complete.
		Other Actions Proposed/Considered	**Other Actions Proposed/Considered**
		A. NIOSH proposes adding an appendix (Appendix E) describing the criteria for determining action items. [December 16, 2010]	A. See Finding 2.
		B. NIOSH acknowledged the importance of documenting comments/ questions from information-gathering/giving (i.e., workshops, invited forums) and information-giving meetings (i.e., joint outreach meetings, Department of Labor Town Hall meetings, SEC information meetings) where an immediate answer is unavailable or where new information is supplied. This is in lieu of taking formal meeting minutes or notes. [December 16, 2010] (ABRWH 2010a, pp. 171–174). SC&A recommends this commitment be reflected in OCAS-PR-012.	B. With the exception of Town Hall meetings, the potential for NIOSH to receive relevant input at information-giving and giving/gathering meetings is not expressly addressed in OCAS-PR-012. The possibility is implied in Appendix F, which lists Action Items (as appropriate) as a potential product of all types of outreach meetings.
			Update Sept. 2012: The following statement was added to the description of each meeting type in Appendix A (OCAS 2012b, pp. 14–17):

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			"NIOSH/ORAU participants should be attentive to discussions in which issues or discussions are appropriate for documenting and tracking in accordance with Appendix E." ***Complete***
		C. NIOSH indicates tracking and trending can be performed on just about any field in OTS, in particular, the Action Item screen. While SC&A acknowledges the mechanics of tracking and trending from this database is possible, OCAS-PR-012 contains no recommendations or requirements for tracking and trending comments. As of December 2010, there were only six action items in OTS. SC&A noted in June 2011 that 16 action items for the Rocky Flats Plant had been added to OTS (SC&A 2011). While the database can be queried to produce reports, too few action items exist to meaningfully trend action items and follow-up responses. SC&A recommends NIOSH continue to upload legacy action items from WISPR. This will establish sufficient data to track and trend worker comments and subsequent actions.	C. Appendix D of OCAS 2012a mentions NIOSH's capability of generating ad hoc reports for field trending. No recommendation or requirement is communicated. NIOSH transfer of WISPR data to OTS was in progress as of the June 29, 2011 Work Group meeting (ABRWH 2011). **Update Sept. 2012:** As discussed at the August 2012 Work Group meeting, ad hoc trending is acceptable to the Work Group, and NIOSH has indicated that the transfer of items from WISPR to OTS is complete.
F2.	**The procedure does not specify criteria for identifying Action Items or evaluating the adequacy and timeliness of response/resolution.** *CLOSED*	Worker Outreach Program (OCAS 2009d) describes a process for documenting and tracking action items, rather than all substantive worker comments. The appropriate determination of action items becomes a critical part of being responsive to worker comments and providing consideration of those comments in the dose reconstruction and SEC processes. Lack of specific criteria may lead to inconsistent determination of action items. This has the potential for increasing workers' perception that their comments are not being considered. Appendix E, added to the procedure, outlines a mechanism for capturing worker comments, documenting and tracking action items, and assigning an owner to action items. Specific wording was discussed at the Work Group	

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		meeting in December 2010. **Work Group Recommended Action Items** **NIOSH:** (1) Additional guidance will be incorporated into OCAS-PR-012 to address Action Items (AIs) final disposition determination. [October 20, 2010] The response will address: - AI [Action Item] commitment date - Review for technical adequacy - Designation of whether a technical document requires an update - Identification of how the action item was closed out [document update, response to individual, etc.] (2) Additional guidance will be incorporated into OCAS-PR-012 to address judgment for identifying AIs: [October 20, 2010] - Informed of a specific area of site profile or technical document that has been pointed out as incorrect or inadequate. - Informed/discovery of new information that may have impact, but may not have been considered before. - Follow-up on a question, request, or the possible need to look for additional information. (3) Evaluate the feasibility of adding to OTS those comments from WISPR that resulted in changes to technical documents.	**Work Group Recommended Action Items** **NIOSH:** (1) Appendix E (OCAS 2012a, p. 28) has been added as described in the Work Group meeting on December 16, 2010 (ABRWH 2010a, pp. 176–178 discusses this action item). *Complete* (2) Appendix E (OCAS 2012a, p. 28) has been added to OCAS 2012a as described in the Work Group meeting on December 16, 2010 (ABRWH 2010a, pp. 185–187, discusses this action item). *Complete* (3) NIOSH transfer of WISPR data to OTS was in progress as of the June 29, 2011 Work Group meeting (ABRWH 2011). **Update Sept. 2012:** At the August 2012 Work Group meeting, NIOSH indicated the transfer of items from WISPR to OTS is complete.
F3.	**The majority of expected documentation is not available in the OTS for meetings conducted**	SC&A delivered *Follow-up Review of the Outreach Tracking System (OTS): Status of Finding 3 from Document No. SCA-TR-PR2010-0002* (SC&A 2010b) in response to the action item to validate updates to OTS accomplished by NIOSH in October 2010. This report was submitted to the Work Group in	

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	within the effective period of PR-012. **IN PROGRESS - Item 1** [Does not impact issuance of revised PR-012.]	December 2010. Several recommendations were included in this report. • Incorporate guidance provided in *Classification of Worker Outreach Meetings* (OCAS 2009e) and *Types of NIOSH Meetings* (OCAS 2009f) into OCAS-PR-012 in order to facilitate consistency of records uploaded to OTS for different meeting types. • Complete communication to and/or training of all potential meeting facilitators on required documentation from worker outreach meetings • Hold meeting facilitators accountable for implementation of worker outreach documentation requirements. **Work Group Recommended Action Items** **SC&A:** (1) Validate whether the updates of OTS completed by NIOSH resolve the concerns under Finding 3. [October 20, 2010] **NIOSH:** (1) Re-evaluate the meeting minutes from the meetings conducted since the implementation of OCAS-PR-012 based on the new Action Item Criteria determining if there are additional action items. [December 16, 2010]	**Work Group Recommended Action Items** **SC&A:** (1) Completed Dec. 2010 (SC&A 2010b). **NIOSH:** (1) At the August 2012 and November 2012 Work Group meetings, NIOSH reported this action is complete. Minutes of each outreach meeting were reviewed by HP staff in light of the new criteria, and no new Action Items were identified. **Update Jan. 2013:** At the August 2012 Work Group meeting, DCAS Director Stu Hinnefeld proposed to review the documentation from the 8 outreach meetings and the HP responses so that the determination would not rest on one person's opinion (ABRWH 2012, pp. 75–78). The status of this administrative review was not discussed at the

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			November 2012 Work Group meeting. *In Progress.*
		(2) Incorporate guidance from *Classification of Worker Outreach Meetings* (OCAS 2009e) and *Types of NIOSH Meetings* (OCAS 2009f) into OCAS-PR-012, or an internal guidance document or communication to staff. [December 16, 2010]	(2) NIOSH added Appendix F, Examples of Likely Outreach Meeting Documents, to PR-012. *Complete*
F4.	**The procedure fails to consider other venues of worker outreach. The multiple venues are not subjected to equivalent standards for documentation. Of particular concern is the two-track system for obtaining and documenting worker input that appears to give site expert interview records more weight than worker input obtained through outreach meetings.** **IN PROGRESS** [Does not impact issuance of revised PR-012.]	Several activities conducted by NIOSH can provide substantive worker input consistent with the objectives of the Worker Outreach Program, but receive little or no attention in OCAS-PR-012. These venues include, but are not limited to: • Advisory Board meetings • OCAS web site/docket • Computer Assisted Telephone Interviews (CATIs) • Close-out Interviews (COIs) • General information provided by workers via e-mail or letters • Site expert interviews While some of these processes are formalized, existing procedures do not provide a mechanism by which general site-specific information (as opposed to personal claimant-specific information) may be captured for consideration in technical work products. SC&A noted what appeared to be a two-track system for gathering input from former and current workers: worker outreach has formalized requirements for documentation, but lacks integration with the site profile and SEC evaluation processes; site expert interviews are relatively informal, but may carry greater weight in the development of technical documents due to direct participation of document authors in the process. NIOSH indicates that, procedurally, the two-track system for obtaining and documenting information does not exist. The agency attempts to identify personnel who have knowledge of the facility and	

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[2] This action item is listed under F5 prior to matrix revision 4. It was discussed under F4 on October 20, 2010, and is responsive to the issues associated with this finding.

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		its era of operation, regardless of their site discipline, union, or professional status/affiliation. There are several facets to SC&A's concerns regarding multiple venues and the two-track system. • An equivalent level of rigor should be applied to the documentation of information received from all venues. • Fragmentation, as opposed to centralization of worker input, makes it difficult for personnel involved in the dose reconstruction and SEC evaluation processes to locate and utilize the information provided by the workers. This may lead to unequal weighting of worker input. • There is no systematic method described for documenting and resolving differences in important technical input that may arise from different settings in which different classes of workers are typically represented. SC&A recommends considering a consolidated system of identifying substantive comments and issues raised by workers. **Work Group Recommended Action Items** **NIOSH:** (1) Look at the feasibility for capturing and tracking information in the OTS derived from any type of meeting or correspondence deemed potentially important to dose reconstruction.[2] For example, this may be through added fields in OTS to accommodate this application or through a separate tracking system. [October 20, 2010]	**Work Group Recommended Action Items** **NIOSH:** (1) As discussed at the August 2012 Work Group meeting (ABRWH 2012a, pp. 82-94), it is a complex undertaking to integrate worker input from multiple venues received in different forms. Some venues will be straightforward to integrate; some (particularly CATI and Close-Out Interviews) may be very complicated. The group agreed it is an important goal to give attention to worker input by virtue of its significance regardless of its source.

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			Update Jan. 2013: NIOSH will consider the possibility that ORAU DR reviewers could capture general information relevant to the site from individual CATI and close-out interviews (ABRWH 2012a, pg. 93-94). This would facilitate the capture of general site information through an existing process.
			At the November 2012 Work Group meeting, NIOSH presented information about a new database that is under development to eventually consolidate comments from multiple outreach venues. Technical staff is currently assessing data management needs. No timetable has been identified. ***In Progress.***
		(2) Develop a proposal for resolving the dual tracks system for site expert interviews and worker outreach meetings. This will take into consideration different types of worker comments, the various sources of comments, and how it informs the review/preparation of technical work documents. Furthermore, consideration will be given to resolving how comments from different types of workers or site experts are weighted. [December 16, 2010]	(2) Appendix E provides guidance regarding the identification, tracking/resolution, and consideration of impact of Action Items from worker outreach meetings. NIOSH has indicated that PR-012 will not address the broad range of venues from which input can be received.
			Update Jan. 2013: At the August 2012 Work Group meeting, the Work Group requested a proposal and timeline from NIOSH (ABRWH 2012a, pg. 95). Refer to item 1 above regarding new comprehensive database under

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			development). *In Progress.*
F5.	**The procedure does not describe a process for assuring that worker feedback is accurately and completely documented.** **CLOSED**	• The lack of a requirement in PR-012 [OCAS 2009d] for an affirmative sign-off by meeting participants who provided input, along with the destruction of audiotapes, prevent the resolution of issues that arise regarding omissions or misrepresentation of meeting participant comments. SC&A recommends a feedback loop, including a specified review period, be incorporated into OCAS-PR-012 for verifying the accuracy and completeness of meeting minutes, notes, and/or interview summaries. Furthermore, the procedure should address how comments provided during information-giving meetings are to be documented and resolved. • SC&A recommends that the invitation letter should include a disclosure that tapes made by NIOSH and its contractor will be destroyed, so that participants can bring their own equipment, should they desire to record the proceedings. **Work Group Recommended Action Items** **NIOSH:** (1) In OCAS-PR-012, include additional wording at the end of the statement addressing the recording of the meeting, stating that copies of the recording will not be available for public distribution.[3] [October 20, 2010] (2) Evaluate feasibility of incorporating feedback loop into PR-012. Feedback for a large group meeting may be obtained from the meeting organizer. After a specified target date, lack of response is interpreted as consent or	**Work Group Recommended Action Items** **NIOSH:** (1) An announcement regarding recordings is described in Appendix A (General Meeting Structure & Discussion Points). *Complete.* (2) Appendix G of draft PR-012 describes a feedback loop in which draft outreach meeting minutes are distributed to the

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[3] This action item is listed under F4 prior to matrix revision 4. It was discussed under F5 on October 20, 2010 (ABRWH 2010b, p. 184), and is responsive to the issues associated with this finding.

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		agreement. [June 29, 2011]	host organization and posted on the web site for 60 days. To promote review and comment by individual participants, SC&A recommends informing participants at the time of the meeting that the minutes will be posted for their validation (following internal review, DOE review, and PA redaction). **Update Sept. 2012:** The revised procedure includes an additional announcement "that the meeting minutes will be posted on the NIOSH Web for their validation for 60 days (following internal review, DOE review, and PA redaction)" (OCAS 2012b, pg. 18). "Where notes are taken in lieu of minutes, notes are recapped with the group/individual prior to the close of the meeting to verify accuracy and completeness…" (OCAS 2012b, pp. 4, 5, and 34). ***Complete***
OCAS-PR-012 OBSERVATIONS			
Obs 1.	**The procedure does not address the possibility that sensitive or classified information could be shared at worker**	At a minimum, the procedure should alert worker outreach staff to submit recordings, minutes and meeting notes for classification review if they have any doubt about classification status of information shared at an outreach meeting.	

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[4] This action item is listed under F4 prior to matrix revision 4. It was discussed under Obs 1 on October 20, 2012, and is responsive to the issue associated with Obs 1.

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		Work Group Recommended Action Items	**Work Group Recommended Action Items**
	CLOSED	**NIOSH:** (1) Add a reference and a sentence in OCAS-PR-012 to note the review of minutes by the Department of Energy.[4] [October 20, 2010]	**NIOSH:** (1) DOE classification review of meeting minutes/notes is described in Section 5.0 (General) and in Appendix G (Development process for worker outreach minutes). *Complete*
		(2) Address/reference the process in OCAS-PR-012 for the discussion of classified/sensitive material with present or former DOE workers and employees. [October 20, 2010]	(2) References and information have been added to PR-012 in Section 3.0 (p. 2) and Appendix A (p. 16). *Complete*
Obs 2.	**The procedure does not provide an opportunity for workers to discuss potentially classified information. Particularly at NNSA sites, workers may be restricted from openly discussing site-specific information due to security concerns.** **CLOSED**	Worker outreach meetings at some sites can inadvertently solicit classified information. A cautionary statement should be made upfront that reminds individuals to be cautious about the information they are sharing. Participants should be notified that the meeting is an unclassified meeting and that classified information should not be shared. The procedure should describe a process for those who wish to share classified information. **Work Group Recommended Action Items** **NIOSH:** (1) In OCAS-PR-012, add a discussion to include an announcement at the beginning of an outreach meeting "not to discuss classified/sensitive information. If there is a need to discuss classified/sensitive information, a separate interview can be arranged." [October 20, 2010] (2) Address/reference the process in OCAS-PR-012 for the discussion of classified/sensitive material with present or former DOE workers and employees. [October 20, 2010]	**Work Group Recommended Action Items** **NIOSH:** (1) Statements have been added to PR-012, Appendix A, p. 16, as discussed at the December 16, 2010 Work Group meeting (ABRWH 2010a, pp. 222–223). *Complete* (2) A note in Appendix A directs staff to conduct and document special interviews in accordance with Section 5.2 of OCAS-PR-010 (OCAS 2009b), Data Access and Interview Procedures. *Complete*

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Obs 3.	**There are no provisions for soliciting comments from workers who are unable to physically attend the meetings.** **IN PROGRESS - Item 2** [Does not impact issuance of revised PR-012.]	**Work Group Recommended Action Items** **NIOSH:** (1) In OCAS-PR-012, address that independent interviews associated with a specific outreach meeting will be collated with the minutes of the group meeting for continuity and usability. [October 20, 2010]	**Work Group Recommended Action Items** **NIOSH:** (1) The capture of special interviews in OTS is addressed in Section 4.7 (p. 3) and Appendix A (p. 16). Appendix A indicates that interview documentation "is to be entered into the OTS for the respective facility and meeting if cleared for release" (p. 16). **Update Sept. 2012:** The following statement has been added to Appendix G (OCAS 2012b, pg. 34). *Note: Connectivity of minutes for a specific outreach and associated independent interviews with that outreach will be coupled in the SRDB through a naming convention. The naming convention, as an example for an SEC, is "Documented Communication (SEC00192)..." for an SEC outreach meeting minutes placed into OTS. This naming convention will be replicated when placed into the SRDB. Interviews performed in conjunction with this SEC outreach meeting and placed into the SRDB will have the same naming convention "Documented Communication (SEC00192)..." This naming convention will connect the outreach minutes to associated independent interviews when doing a search during SEC evaluations and technical basis*

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			document updates. **Complete**
		(2) Check into posting the presentations from the worker outreach meetings on the NIOSH web site. [December 16, 2010]	(2) NIOSH investigation of feasibility of posting outreach meeting presentations is in progress.
			At the June 2011 Work Group meeting, NIOSH noted that the government is restricting informal presentations from being posted on government agency web sites. They would need to request special permission from above NIOSH to post presentations that are not taken directly from formal numbered publications. (ABRWH 2011, pp. 251–253).
			Update Jan. 2013: This question was discussed, but not resolved, at the August 2012 Work Group meeting (ABRWH 2012, pp. 122–130) and the November 2012 Work Group meeting. The Work Group regarded this as "nice to have," but not essential. NIOSH will check into this issue and evaluate what additional burden would be placed on NIOSH to post Worker Outreach meeting presentations on the website. *In Progress.*
		Other Actions Proposed/Considered	**Other Actions Proposed/Considered**
		A. NIOSH proposes adding the following verbiage to the procedure (ABRWH 2010a, p. 235): *Support efforts where individuals would like to participate in an outreach*	A. The statement regarding support for individuals who are unable to attend has been incorporated, verbatim, into OCAS-PR-012 Draft June 22, 2012

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		meeting but are unable to for some reason. This may include establishing teleconference capabilities at the scheduled meeting, providing phone interview arrangement, directing individuals to the NIOSH website for their feedback, or directing individuals to the DCAS HP.	(Section 6.2.6, p. 7). ***Complete***
Obs 4.	There is no requirement for disclosure of conflict of interest during worker outreach meetings. **CLOSED**	**Work Group Recommended Action Items** NIOSH: (1) In OCAS-PR-012, indicate that NIOSH and contractor personnel will disclose whether they are conflicted or not. [October 20, 2010]	**Work Group Recommended Action Items** **NIOSH:** (1) Statements have been added to PR-012, Appendix A for Focus Group Meetings and for Worker Outreach Town Hall Meeting. Members of NIOSH, Board, Board Contractor, ORAU, Outreach Support Contractor, and other NIOSH support personnel are asked to state whether they are conflicted or not. ***Complete***
Obs 5.	The Site Profile and Technical Basis Document Development (ORAUT 2007) procedure references ORAUT-PROC-0097 (ORAUT 2005), which has been replaced with OCAS-PR-012. **CLOSED**	At the time of SC&A's review of OCAS-PR-012, ORAUT-PROC-0031 (ORAUT 2007) still referenced ORAUT-PROC-0097, which had been replaced with PR-012. The interconnection between site profile development and worker outreach efforts no longer exists with OCAS-PR-012. This and other procedures, plans, and policies that reference ORAUT-PROC-0097 should be updated to reflect the current worker outreach processes and procedures. **Work Group Recommended Action Items** NIOSH: (1) Inform ORAUT that procedure ORAUT-PROC-0031 references ORAUT-PROC-0097, which is no longer in use. [October 20, 2010]	**Work Group Recommended Action Items** **NIOSH:** (1) According to discussion at the Work Group meeting on December 16, 2010 (ABRWH 2010a, pp. 248–249), NIOSH sent an e-mail to ORAUT informing them the reference to ORAUT-PROC-0097 should be removed from ORAUT-PROC-0031, *Site Profile and Technical Basis Document Development* (ORAUT

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			2007). This will be done during the next update to the procedure. ORAUT-PROC-0031 is not posted on the NIOSH web site. SC&A is unable to identify the current version to evaluate closure of this observation. **Update Sept. 2012:** As reported at the August 2012 Work Group meeting (ABRWH 2012, pp. 131–133), NIOSH confirmed that PROC-0031 has been revised. A search for PROC-0097 was conducted, and the term only appears in the record of changes. *Complete*
OUTSTANDING ORAUT-PROC-0097 FINDINGS			
Finding PROC-0097-4 (SC&A 2007)	**The procedure does not explicitly require worker outreach meetings for all sites where site profiles are being prepared, but it refers to ORAUT-PLAN-0010 (ORAUT 2004), which has such a specification.** **CLOSED**	Under ORAUT-PROC-0097, the focus of outreach meetings was dominated by site profile development. ORAUT-PLAN-0010, which provided an implementation plan for ORAUT-PROC-0097, is also no longer effective. Legacy issues exist from the period of time when ORAUT-PROC-0097 was in effect. The lack of worker outreach meetings supporting site profile development, historically, has not been resolved, and in some cases has led to gaps in current site profiles. SC&A recommends that a review of the site profiles where no worker outreach was conducted be re-evaluated to determine whether the site profile would benefit from an information-gathering meeting. At the August 2012 Work Group meeting, NIOSH/ORAU noted that the procedural requirement was not binding after ORAUT-PLAN-0010 was cancelled (March 2006).	

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		Work Group Recommended Action Items **SC&A:** (1) Provide the Work Group with examples where worker outreach meetings were not held during the preparation of the site profile. [December 16, 2010] **NIOSH:** (1) Provide a written response of rationale for lack of worker outreach meetings supporting site profile development. [December 16, 2010] (2) Review and respond to SC&A e-mail of June 16, 2011, in regard to potential benefit of outreach meetings for sites lacking outreach and site expert interviews. [June 29, 2011] (3) Provide updates for sites where meetings have been conducted since June 2011. [August 29, 2012]	**Work Group Recommended Action Items** **SC&A:** (1) SC&A submitted an e-mail listing examples of site profiles completed in the absence of worker outreach meetings on June 16, 2011. Site expert interviews were also considered in developing the list. **NIOSH:** (1), (2), and (3): **Update Jan. 2013:** NIOSH presented a written response at the November 2012 Work Group meeting (NIOSH 2012). The sites listed in SC&A's memo were categorized and addressed as follows: o Sites where SECs have been granted or considered by the Board, but not recommended: Work is complete for these sites, except for occasional DRs, and outreach is not warranted at this time. o Sites in the process of Board review for unresolved periods of an SEC petition or for findings from a site profile review: The need for worker outreach "will be determined by the finding resolution process under the

No.	ISSUE STATUS[1]	SC&A Summary of Work Group Resolution History	SC&A Assessment of Status
			auspices of the respective Work Groups" (NIOSH 2012, p. 2). o For the remaining sites: "NIOSH will consider pursuing worker outreach activities as outreach resources are available, keeping in mind other project priorities. The ability to identify a target population and some judgment of the likelihood of obtaining helpful information will also influence decisions about where to conduct outreach activities" (NIOSH 2012, p. 3). ***Complete***

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