



EFCOG ISM Working Group

**Feedback & Improvement Subgroup -
Panel Discussion on DOE O 226.1 Implementation**

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Introduction

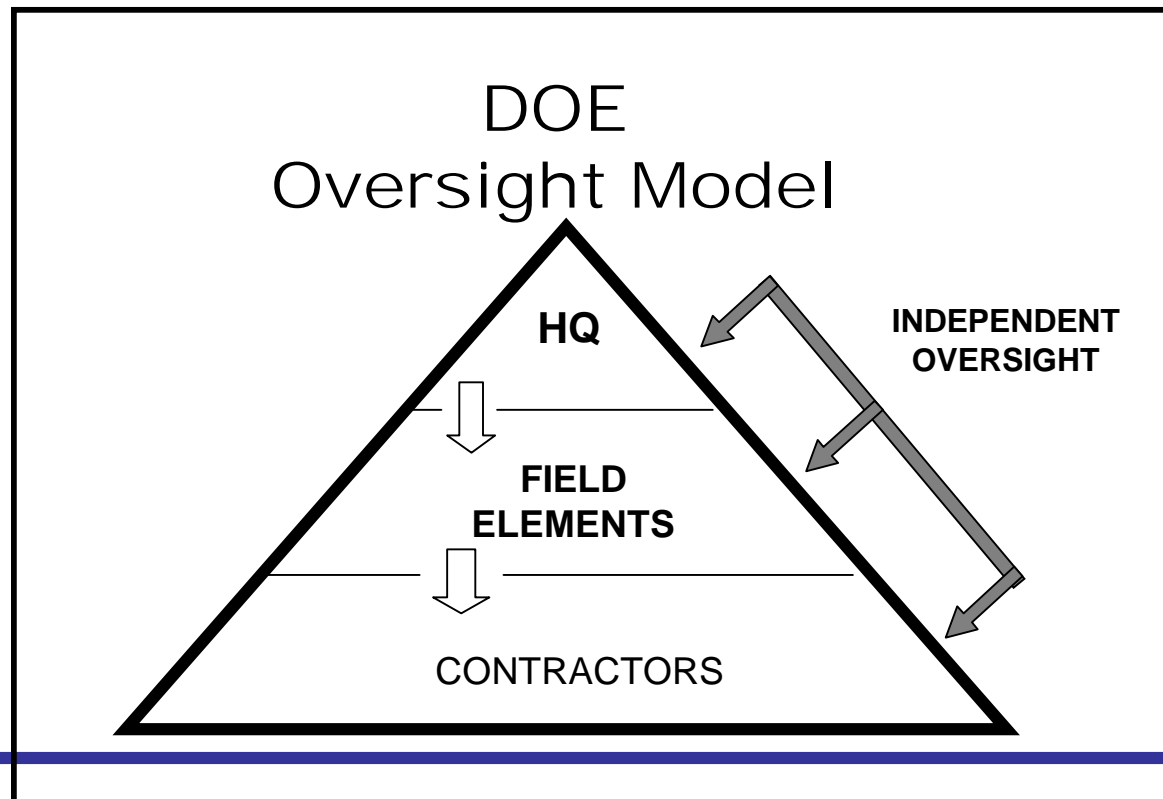


- In 2003, DOE Order Review Panel recommended the development of a single order for all oversight activities.
- Development of the policy and order were incorporated into the Department's 2004 Management Challenge Action Plan.
- Policy and Order 226.1 were incorporated into the 2004-1 Implementation Plan.
- Policy 226.1 was approved June 10, 2005.
- Order 226.1 was approved September 15, 2005.



Objectives

- Provides a comprehensive framework for integrated management of programs that were historically stove-piped along organizations and functional areas.
- Formalizes the four essential elements of the DOE oversight model.





Oversight and Assurance Programs



- Provide the framework for “how everything fits together” to include prioritization of activities based on rigorous analysis.
- Develop Program Description Plans for Federal Oversight.
- Develop Contractor Assurance System Program Descriptions.



Oversight and Assurance Plans and Processes



- Provide the basis for a strategic approach to Oversight and Assurance activities.
- Build on base-line requirements.
- Enhance expectations for areas of continuing weakness (e.g., corrective action management, self-assessment).
- Require balance between programs and performance.



Initial Schedule for Oversight Implementation



- Incorporate CRD into all contracts, no later than 6 months after the date of the order (March 15, 2006).
- DOE HQ and field elements revise policies and directives to conform to DOE P 226.1 and O 226.1 by September 15, 2006.
- Path Forward - Perform Gap Analysis to support effective implementation and near term schedules.



Summary of Recent Changes



- Requirement for HQ approval of CAS assigned to Field
- HSS is the OPI removed reference to Oversight Committee
- Removed reference to business operations
- Phased implementation strategy for security, cyber security and emergency management



Current Status of DOE P and O 226.1A



- § August - September 2006 -- working group addressed changes to 226.1 based on direction from the Deputy Secretary
- § October 2, 2006 -- a proposed revision to DOE P and O 226.1A was submitted to the DOE Office of Management
- § October 19, 2006 -- DOE P and O 226.1A was sent to the newly established Advisory Group to review justification and to endorse submission to RevCom
- § November 1, 2006 -- Approval granted for RevCom
- § November 3, 2006 -- Start 30-60 Day RevCom process for Policy and Order



Crosswalk Analysis to the Six Recommendations



Item	Recommendation	Resolution in DOE 226
Recommendation 1	HQ line organizations should oversee the Federal elements in the field, the Federal field elements should oversee the contractors. HQ line should limit its review of contractors as much as possible.	<i>Words added to Order to clarify HQ oversight responsibility primarily directed towards the Field Elements, and can look at the contractor, to the extent necessary, to verify effectiveness of Field Element Oversight</i>
Recommendation 2	The requirements for HQ to approve Contractor Assurance Systems, field oversight plans, and ISM System Descriptions (see commitment 22) can lead to micromanagement.	<i>Requirement for HQ approval of contractor assurance systems etc. removed from Order and assigned to Field Elements</i>
Recommendation 3	To promote ownership, responsibility and accountability, the Order should be the responsibility of an individual, not a committee.	<i>SSA (now HSS) assigned as OPI for Order. Establishment of Oversight Committee was removed from Order</i>
Recommendation 4	Initial implementation of the Order should be limited to safety; more clarity is needed on expectations for oversight in other areas, particularly cyber security and business operations.	<i>Revised/phased implementation strategy now included in Order for security, cyber, and emergency management. Business Operations functional area was deleted from Order. Expectations for ES&H implementation remained the same</i>



Crosswalk Analysis to the Six Recommendations (cont'd)



<p>Recommendation 5</p>	<p>The Order duplicates requirements existing in the QA rule, QA Order, and other Directives.</p>	<p>No changes in Order required. As part of issuance of O226.1, a formal review/impact study of other DOE Directives was done in response to DNSFB comments on draft O226.1 to identify conflicts with other Directives. This effort identified several Directives, including O414.1C <i>Quality Assurance</i>, O442.1A <i>Employee Concerns Program</i>, and O470.2B <i>SSA Independent Oversight Program</i> requiring revision. These Directives will be revised on their normal scheduled review cycle. This commitment is identified in SIMS tracking system and recent correspondence to the Board on these Directives demonstrates this issue is being adequately tracked/addressed. Other Directives such as the revised Integrated Safety Management Manual were in development <u>after issuance of O226.1</u> and have adequately addressed coordination aspects with O226.1</p>
<p>Recommendation 6</p>	<p>The Order does not specify a graded approach for small contractors and sub-contractors. Recommended Action: Modify DOE Order 226.1 to address the concerns above.</p>	<p>Order incorporated language within the CRD, to implement similar approach and expectations for flowdown to subcontractors as that for ISM contained within the ISM DEAR clause</p>