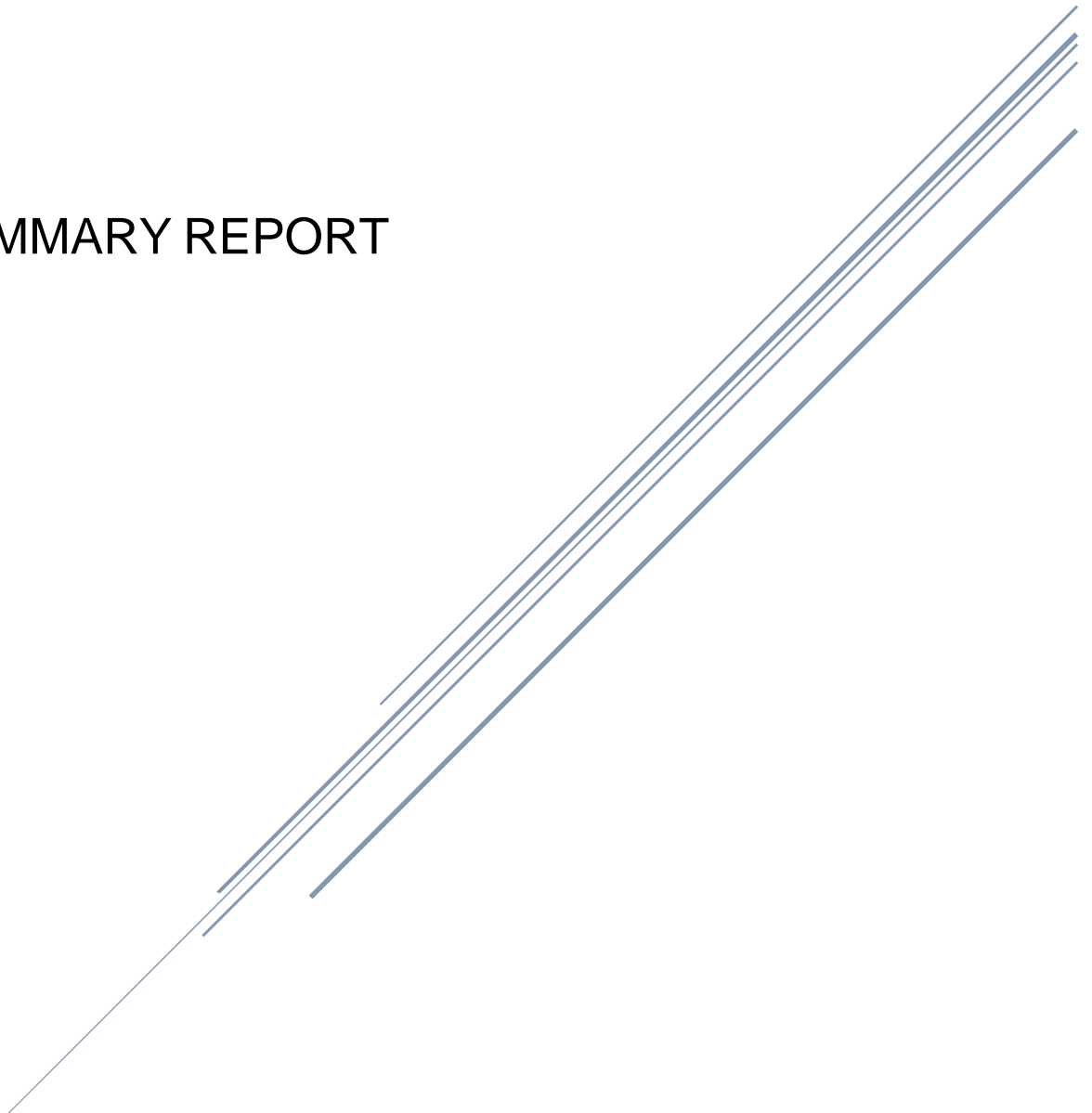


# OCSPF LOOKING FORWARD: A CLIMATE ASSESSMENT

## SUMMARY REPORT



Federal Consulting Group  
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## Introduction

In March 2021, Michal Freedhoff, the Assistant Administrator of the Office of Chemical Safety and Pollution Prevention (OCSPP) assured the staff that she and the OCSPP senior leadership team are committed to scientific integrity, robust scientific debate, and an environment where staff and managers identify errors, ask questions and express differing scientific opinions. In response to her commitment, an assessment was initiated of the New Chemicals Division (NCD) within the Office of Pollution Prevention and Toxics (OPPT). It is envisioned that this effort will be expanded to other parts of OCSPP.

The Federal Consulting Group (FCG) was asked to help OCSPP capture feedback from employees and management about any potential workplace barriers and opportunities for organizational improvement. The charge for the study's first phase was to engage both NCD employees and management who contributed to OPPT's New Chemicals Program from 2016 to the present. The overarching goal was to support OPPT and the New Chemicals Division along its pathway to becoming a high-performing organization. The feedback gained in this assessment is important to understand NCD's work practices and culture.

Participation in the assessment was completely voluntary. There were three ways for NCD employees to share their views, experiences, and other feedback: a survey, four listening sessions, and individual interviews. Respondents included 29 employees for the survey, 13 for the listening sessions, and 10 for the interviews. OCSPP's union partners were advised of all the appropriate meetings associated with this assessment.

Because every effort was made to provide for anonymous participation, it was not possible to determine if the responses are representative of all NCD. The climate assessment reflects employee feedback and concerns, without attribution, as well as suggestions from respondents for moving forward. Confidentiality of the information and the identity of individuals participating in this assessment have been protected to the greatest extent possible. Opportunities for anonymous participation in the survey, listening sessions, and individual interviews were provided. This report does not attribute any observations, findings, and/or recommendations to specific individuals.

The scope of the Climate Assessment did not include an investigation of violations of the Agency's Scientific Integrity Policy. This assessment is separate and apart from any other audits and/or investigations being conducted by the Office of Inspector General, per [Project Notification Liter. 7.14.21](#). The IG may request any materials obtained as part of the climate assessment that is relevant to the OIG's investigation.

## Findings

The goals of the assessment were to gain a better understanding of potential challenges that employees of the New Chemicals Division may be facing in performing their very important work within OCSPP and to identify opportunities for improvement moving forward.

The consistent overarching emotions and themes that emerged from these employee input opportunities include:

- **Commitment** to the Agency's mission, the organization, and their work.
- **Hope** that NCD will trust the science, follow the law, resist external pressures, and act to protect human health and the environment. While there are many challenges, there is strong acknowledgment and appreciation from respondents that the Risk Management and Industrial Chemistry branches are working well.
- **Fear** that some colleagues will secretly record them, categorize honest mistakes as scientific integrity violations, and ruin their good name and reputations.
- **Anger** at being bullied and harassed by NCD colleagues and managers, and dissatisfaction that the organization is not protecting them.
- **Frustration** with the heavy workload, lack of staff, and concerns with some on the NCD management team.
- **Disappointment** that their situation is not improving.

Underlying the concerns and challenges in NCD as expressed by respondents, there was enthusiasm about the importance of their work in protecting the American people as they review the newest chemicals coming onto the market, passion for the science, and sincere gratitude for the opportunity to work with highly skilled, hard-working colleagues.

The following are overviews of the input received from respondents who participated in the climate survey, listening sessions, and individual interviews.

### The Survey

The Climate Survey, Phase 1 of the OCSPP Looking Forward: Climate Assessment, was conducted from October 12 to October 26, 2021. There were 29 anonymous respondents.

The responses were thoughtful, frank, detailed, critical, and hopeful. They revealed that emotions are running quite high among the respondents. They expressed:

- **Hope** that NCD will trust the science, follow the law, resist external pressures, and act to protect human health and the environment.
- **Fear** that some colleagues will secretly record them, categorize honest mistakes as scientific integrity violations, and ruin their good name and reputations in the agency and the press.
- **Anxiety** that management is not protecting them from bullying and harassment from colleagues and managers.
- **Frustration** with the management team in NCD due to micromanagement, too many meetings, limited management skills, limited knowledge of science and science policies,

and exercising inadequate leadership. Leadership is essential to create standard policies and procedures that guide decision-making and reduce issues of scientific integrity, as well as allocate resources to get this done.

- **Disappointment** that there has not been a marked improvement in the workload and stress.

Suggestions that were most often raised by the respondents include:

- **Hire more staff.** If more staff cannot be hired, right-size the workload to fit the staff.
- **Create a safe work environment** free from harassment, bullying, intimidation, and public humiliation.
- **Improve the overall management** of NCD by reducing micromanagement, pushing decisions to the lowest level possible, reducing the number of meetings, reducing the reporting burden, and updating CBI LAN and E-FAST.
- **Develop written standard policies and practices** to guide the work, reduce the “relitigation” of science, and improve program operations.
- **Review and evaluate the NCD management team.**
- **Offer professional development opportunities and training to existing staff and managers.** Communicate a fair and transparent process for accessing development and training opportunities. Train new hires.
- **Improve communication and transparency** between NCD management and staff on decisions related to science and organization.

### Listening Sessions

Four Listening Sessions were held on October 27 and November 2 as Phase 2 of the *OCSPP Looking Forward: Climate Assessment*. Employees had the option to sign in anonymously or use their names. During the listening sessions, no one was referred to by name. There was not a great deal of participation in the listening sessions. Only a total of 13 people logged into the four listening sessions. In one session with managers and staff, the discussion was minimal.

After the listening sessions, in subsequent interviews concerns were expressed about the potential for retaliation, the presence of ‘spies,’ and/or feelings that they could not be candid. These concerns were reflected in the quality and quantity of comments in the discussions.

While the responses provided excellent feedback and suggestions for moving forward, they were not as frank, detailed, or critical as in the survey and the interviews.

Recommendations raised most frequently include:

- **Hire** more staff.
- **Train** new staff, current staff, and managers.
- **Develop written standard policies and practices** to guide the work
- **Create a safe work environment** free from harassment, bullying, intimidation, and public humiliation from staff and managers.
- **Improve communication and transparency** between management and staff.

## Individual Interviews

Individual interviews were conducted in November 2021 as Phase 3 of the OCSPP Looking Forward: Climate Assessment. The interviews ranged from 45 minutes to 90 minutes each.

Employees had the opportunity to sign up for interviews anonymously or use their names. During the interviews, names were not used. Ten employees chose to participate in the interviews. Some interviewees noted that other staff chose not to take part in the interviews because confidentiality could not be assured, and they feared retaliation by NCD supervisors and managers. Even in the anonymous interviews, the fear was palpable from both those that self-identified as NCD staff and as NCD management.

The interviewees not only supplied frank answers to the interview questions, but they also provided recommendations for addressing many of the issues that they raised.

Recommendations raised most often include:

- **Hire** more staff. Right-size the workload for the onboard staff.
- **Train** new staff, current staff, and managers.
- Re-build staff **collaboration, cohesion, and trust**.
- Improve **communication and transparency** between NCD management and staff.
- Develop and **document written standard policies and practices** to guide the work.
- Create a **safe working environment** free from fear, intimidation, hostility, and disparaging remarks from managers and staff.
- **Modernize the CBI LAN** infrastructure.
- **Buy the proprietary toxicity prediction software** used by submitters to check the applications.
- Improve the overall **management** of NCD by evaluating the NCD management team, reducing micromanagement, and reducing retaliation by separating the science review from the performance review.
- The **Risk Management and the Industrial Chemistry Branches are working well**. Do not change them.
- The **Risk Assessment Branches are not working well**. There are needs for more risk assessors, standard operating procedures, new NCD management, and separation of management reviews of science products from performance reviews.

## Summary of Challenges from Participants

Looking across all the feedback mechanisms (survey, listening sessions, and interviews), the following summarizes the challenges identified by participants.

In the survey, NCD participants were asked what processes, people, or systems are impeding their ability to get work done. The respondents in the listening sessions and the individual interviews were asked to identify the challenges they are facing in getting their work done. The

responses to those two questions are summarized below by theme – Mission, People, Work, and Processes.

- The Mission
  - Respondents felt NCD management’s focus is on meeting the deadlines, rather than promoting human health and the environment.
  
- The People
  - NCD is seriously understaffed. There are not enough staff to carry out the mission and meet statutory deadlines. If more staff cannot be hired, the workload should be right sized to fit available resources.
  - Highly trained staff are critical to success, yet there are insufficient opportunities for training, professional development, and knowledge transfer.
  - Citing various concerns, some respondents said that the NCD management team should be reviewed and evaluated.
  - Reviews of health reports by NCD management are a major bottleneck in completing chemical reviews, and some felt these reviews should not be done by the same managers who are responsible for employee performance reviews.
  
- The Work/Workplace
  - NCD faces an extremely demanding workload and tight deadlines. In some parts of NCD, changing management direction, micromanagement, many meetings, and excessive reporting burden leads to confusion, stress, and missed deadlines.
  - Some staff are fearful of harassment, bullying, retaliation, and loss of reputation from colleagues and managers. They want management to ensure their safety.
  - The loss of trust coupled with poor communication and collaboration are serious challenges to conducting work, especially about science and risk assessment.
  
- The Processes/Systems
  - NCD lacks well-documented standard procedures and processes that are critical to guiding the work.
  - The IT infrastructure and databases used by NCD need to be modernized to address several issues, including the use of multiple computer systems for tracking, outdated E-FAST, and an outdated and unreliable CBI LAN infrastructure.

#### Summary of Actions Suggested by Respondents

To capture views on suggested actions, two questions were included in the survey, listening sessions, and interviews:

1. What changes would you like to see to improve the division?
2. What would be the most helpful actions that could be taken to improve the New Chemicals Division?

From over 50 responses, the suggested actions can be summarized by theme.

- The Mission
  - Reaffirm the commitment of NCD to trust the science, follow the law, resist external pressures, and act to protect human health and the environment
  - Share and implement the outcomes from this Climate Assessment.
  
- The People
  - Hire more people. Explore ways to expedite the hiring process.
  - Provide training and development opportunities for NCD new staff, current staff, and management. Provide mentors for new staff.
  - Organize supervisory training and team coaching for all the managers in NCD.
  - Review and evaluate the NCD management team.
  - Separate the people who review the science from the people who review employee performance.
  
- The Work/Workplace
  - Manage the workload to mitigate the day-to-day stress on staff.
  - Show support and appreciation to the staff by highlighting staff accomplishments to promote chemical safety to protect human health and the environment.
  - Convey expectations, responsibility, and accountability for maintaining a safe work environment. Take appropriate steps to stop retaliation, bullying, and hostile and disruptive behavior from staff and managers.
  - Improve communication and transparency between NCD management and staff. Take needed steps to rebuild collaboration, cohesion, and trust.
  
- The Processes/Systems
  - Develop and document written standard policies and practices to guide the work and review the new QA/QC process to improve the workflow.
  - Modernize the CBI IT infrastructure, procure proprietary toxicity prediction software, update E-FAST, and eliminate the use of multiple computer systems for tracking.

## **Closing**

The staff who participated in the Climate Assessment were very thoughtful and provided recommendations that ranged from those that can be implemented in the near term with little added resources to those that will require time, funds, and FTE. Their intimate knowledge of the circumstances found in NCD today and their thoughtful recommendations serve as a starting point to create the high-performing New Chemicals Division envisioned by this Climate Assessment.

The following table provides an overall summary of the challenges and actions suggested by the respondents to the Climate Assessment.

THEMES	CHALLENGES IDENTIFIED BY RESPONDENTS	ACTIONS SUGGESTED BY RESPONDENTS
Mission	<ul style="list-style-type: none"> <li>• Respondents felt that management's focus is on meeting deadlines.</li> </ul>	<ul style="list-style-type: none"> <li>• Act to protect human health and the environment, trust the science, follow the law, and resist external pressures.</li> </ul>
People	<ul style="list-style-type: none"> <li>• NCD is seriously understaffed.</li> <li>• Insufficient opportunities exist for training, professional development, and knowledge transfer.</li> <li>• Respondents raised various concerns about the NCD management team.</li> <li>• Reviews of health assessments by management are a major bottleneck.</li> </ul>	<ul style="list-style-type: none"> <li>• Hire more people. Expedite the hiring process.</li> <li>• Reduce attrition/maximize retention.</li> <li>• Provide training and development for new hires, existing staff, and managers.</li> <li>• Review and evaluate the NCD management team to create a high-performing organization.</li> <li>• Add more non-supervisory management reviewers of assessments.</li> </ul>
Work/ Workforce	<ul style="list-style-type: none"> <li>• NCD faces an extremely demanding workload and challenging deadlines.</li> <li>• Some staff are fearful of harassment, bullying, retaliation, and loss of reputation from colleagues and managers.</li> <li>• The loss of trust and poor communication are serious challenges.</li> </ul>	<ul style="list-style-type: none"> <li>• Better manage the workload to reduce employee stress.</li> <li>• Create a safe work environment for everyone.</li> <li>• Improve communication and transparency between management and staff across NCD.</li> </ul>
Processes/ Systems	<ul style="list-style-type: none"> <li>• NCD lacks well-documented standard procedures and processes.</li> <li>• The IT infrastructure and databases are outdated and unreliable.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop written standard policies and practices.</li> <li>• Modernize IT infrastructure and databases including CBI LAN, E-FAST, and reduce the use of multiple systems for tracking.</li> </ul>

In addition to identifying challenges and recommended actions, the respondents also spoke of their belief that the work in OCSPP will help protect human health and the environment. They valued the opportunity to work with very talented scientists and engineers to address big and small issues related to chemical exposure and effects.

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*Respondents expressed hope for a New Chemicals Division that will trust the science, follow the law, resist external pressures, and act to protect human health and the environment -- and the staff.*

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