TECH TIP

CalARP Program 4 – Management of Organizational Change (MOOC) Requirements

Is your facility considering making an organizational change? If so, you may need to consider whether or not you should complete an MOOC before proceeding. MOOC requirements specifically apply to California Petroleum Refineries that are designated as CalARP Program 4. However, MOOC assessments are a useful tool for any facility considering making major organizational changes and can be considered best practice.

With COVID-19 impacting a wide variety of businesses, more and more companies are considering restructuring their management systems internally to accommodate the transitions to a more remote workforce. MOOCs are a mechanism to ensure that major organizational changes are critically evaluated prior to implementation to ensure that they won't negatively impact employees or the facility.

When are Program 4 facilities required to complete an MOOC?

As specified in §2762.6 (j), facilities are required to complete an MOOC if the organizational change will be in effect for over 90 days and can impact operations, engineering, maintenance, health and safety, and/or emergency response. The assessment should be completed if any of the following will occur as part of the change:

- The responsibilities for employees will increase by 15% or greater.
- Shift durations will be increased.
- Classification levels of employees will be reduced.
- Staffing levels will be decreased.

What needs to be included in an MOOC?

A proper MOOC assessment should have an effective up-to-date written procedure to manage organizational changes. As required by §2762.6 (k) you should include, at a minimum, the following in the MOOC assessment:

- What team members need to be responsible for assessing the proposed change.
- The factors that the team needs to consider during the assessment.
- The rationale for choosing to implement or reject the proposed change.
- Findings from the assessment, including any necessary recommendations.

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What other CalARP elements are impacted by an MOOC?

MOOC is one part of a holistic process safety program and it is vital that the appropriate components are working cohesively with the MOOC Program and are updated, as applicable, based on changes made from an MOOC assessment. As required by §2762.6 (k), the following needs to be addressed with an MOOC:

- Before conducting the MOOC, job function descriptions should be current and accurate for all applicable positions that are affected by the change.

- The owner/operator must provide for employee participation. To address this, the Employee Participation plan should include documentation ensuring there is effective participation in the MOOC process.

- The MOOC analysis must include an assessment of human factors. To address this, the Human Factors Program should include documentation that human factors need to be analyzed as part of the MOOC.

- Employees must be informed of the changes prior to implementation. As part of this requirement, employees should be trained on any changes that may have impacted their job expectations (i.e. if they are required to perform additional or new tasks).

The final step of the MOOC process is to certify that the assessment is accurate, and the organizational changes meet the requirements outlined in the MOOC procedure. If all of these items are considered during an MOOC, the facility should have an easier time adapting to change and successfully restructuring the organization, leading to long-term success.

For more information, join RMP's "Process That!" segment on CalARP Program 4 Requirements, where I will be joining Project Engineer, Katya Mandziuk, to discuss various components associated with CalARP Program 4 requirements and how to successfully implement them. Visit RMP's LinkedIn page for dates and details.

Resources

https://www.caloes.ca.gov/FireRescueSite/Documents/CalARP%20Regs%20Title%2019%20Division%202%20Chapter%204.5.pdf

About the Author:
Ms. Black is a Senior Engineer and has been involved in a variety of activities associated with the California Accidental Release Prevention Program (CalARP), Environmental Protection Agency's Risk Management Plan (RMP) and Occupational Safety and Health Administration's Process Safety Management (PSM) Program. She specializes in facilitating Process Hazard Analysis (PHA) studies using the Hazard and Operability (HAZOP) and Layer of Protection Analysis (LOPA) methodologies.
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