NIOSH 10-Year Program Review Implementation

Stuart Hinnefeld
Director
National Institute for Occupational Safety and Health
Division of Compensation Analysis and Support

December 2011
Tampa, FL

Five Review Reports

- Reports focus on the following topic areas:
  - Dose Reconstruction
  - Quality of Service
  - Timeliness of Program Products
  - SEC Petitions
  - Quality of Science
- Summary of the reports and recommendations are available on the NIOSH Web site at:

  http://www.cdc.gov/niosh/docket/review/docket194/default.html)

Quality of Service

- **Issues related to customer-supplied information**
  - Develop system(s) for collecting all customer comments along with disposition action
- **Issues related to understandability of information**
  - Improve understandability and quality of communication vehicles: Web site, information sheets, letters to claimants or petitioners, etc.
- **Issues related to access to information**
  - Ensure Board and Work Group work products are posted on the Web site as soon as practical

Timeliness

- Give higher priority to claims returned by DOL for new dose reconstruction
- Continue to adopt aggressive timeliness objectives for dose reconstruction
- Adopt aggressive time limits for the completion of the review of SEC petitions

SEC Petitions

- Separate “policy” issues from “science” issues
  - Include more detail on the evolution of a science decision in SEC Evaluation Reports (e.g., thorium exposures)
  - Develop a policy memo with each Evaluation Report that identifies policy decision and the thought process behind the decisions
- Work to define “sufficient accuracy”
- Utilize staff “other than health physicists” when appropriate to guard against “professional orientation” toward accepting adequacy of techniques

Quality of Science

- Consider subjecting program documents to formal peer review
  - NIOSH is developing an implementation guide to identify levels of review of program documents
- Assess validity of indirect exposure methods
  - NIOSH is conducting trial-run validation using Savannah River Site data

Quality of Science—cont.

- Characterize degree of claimant-favorability in current methods
  - Compare "claimant-favorable" approaches to assessment methods commonly used in other applications
- Evaluate utility of EPA surrogate data protocol
- NIOSH review of EPA protocol indicates its recommendations are similar to information in "The Use of Data from Other Facilities in the Completion of Dose Reconstructions Under EEOICPA" (DCAS-IG-004)
  - Non-NIOSH reviewers will review EPA protocol against methods used by NIOSH

Dose Reconstruction

- **Work with Subcommittee on Dose Reconstruction Reviews on QA/QC evaluation**
  - **Develop duplicate analysis program in order to identify potential issues with dose reconstruction process**
  - **Review recent dose reconstruction review findings to determine cause of findings**
- **Prioritize elimination of overestimating dose reconstructions relative to implementation of other program review actions**
  - **Analyze cost of eliminating overestimating dose reconstructions**
  - **Consider impact on long-range budget planning**