Ten Year Review Follow Up Action Items

Concerning Dose Reconstruction

1. Issues related to QA/QC

- Action 1: DCAS/ORAU will provide documentation of current in place QA/QC efforts, including QA/QC plans and the results of several years of use of such plans.
- Action 2: DCAS will work with the Subcommittee on Dose Reconstruction as they explore DCAS QA/QC efforts.
- Action 3: DCAS will provide an answer to the question, "If the Board's review has found an "error" in DCAS's efforts, why was that error not found by the internal DCAS/ORAU QA/QC review?"

2. Issues related to use of efficiency measures

- Action 1: DCAS will review current communications to those filling claims, and where necessary make improvements in such communications.
- Action 2: DCAS will perform a cost benefit analysis of the elimination of the use of overestimating DR's.
- Action 3: DCAS will prioritize the elimination of overestimating DR's relative to their implementation of other Program Review recommendations.

Concerning Quality of Service

1. Issues related to using customer supplied information

- Action 1: DCAS will review current communications vehicles and where appropriate will make improvements in such vehicles.

2. Issues related to Understandability and Quality of Information

- Action 1: DCAS will continue on going efforts to evaluate and improve the understandability and quality of DCAS communication vehicles.

3. Issues related to Access to Information

- Action 1: DFO and staff will continue efforts to see that Board and Work Group work products are posted on the web site as soon as practical.

4. Issues related to perceived burden on claimants and petitioners

- Action 1: DCAS will consider its current communications strategies as they might present perceived burdens to claimants and petitioners, particularly in light of the real burden felt by those individuals through their interactions with the DOL.

Concerning Timeliness

1. Issues related to higher priority to returns

- Action 1: DCAS will continue its current efforts to give higher priority to returns.

- Action 2: DCAS will share with the Program Review team its current targets for processing returns.

2. Issues related to aggressive time limits for DR's.

- Action 1: DCAS will prepare cost estimates for the realization of more aggressive time limits for DR's and prioritize such efforts relative to the implementation of other Program Review recommendations.

3. Issues related to aggressive time limits for the completion of the review of SEC Petitions.

- Action 1: The DFO and the DCAS Director will discuss this issue with the Board Chair and explore strategies for realizing this recommendation while working in conjunction with the Board.

- Action 2: DCAS will prepare a white paper that lays out a plan for realizing this recommendation. The white paper will be s based upon NIOSH and the Board limiting their initial efforts in review of an SEC Petition to only those issues raised by the Petition. Should other issues arise that are worthy of consideration, these issues would be addressed through other means, such as 83.14 petitions.

Concerning SEC Petitions

1. Issues related to separating "policy" issues from "science" issues.

- Action 1: DCAS will prepare a draft of a Petition Evaluation Report that includes a section that identifies all important "decision points," and provides the rational for the path chosen by DCAS in its report. NIOSH Leadership will review such a draft evaluation report to indentify the "nature" of the decisions made. If those decision points are determined to be "policy" decision points, the appropriate level in the organization as to where such decisions should be made will be identified.

2. Issues related to the definition of Sufficient Accuracy.

- Action 1: DCAS will develop a series of paragraphs that begin to define, to the degree possible, aspects of a definition of “sufficient accuracy.”

- Action 2: NIOSH Leadership will review such paragraphs and provide feedback to DCAS.

3. Issues related to a possible Health Physics bias.

- Action 1: In drafting the paragraphs related to the definition of sufficient accuracy, DCAS will consult with "other than Health Physicists." In this way it can start to explore the contributions that can be made to the program by other disciplines.

Concerning Quality of Science

1. Issues related to Documentation.

- Action 1: DCAS will explore the use of tools (such as data base management tools) to minimize the possibility of inconsistencies between NIOSH Procedures.

- Action 2: DCAS will develop a list of products it will submit to external peer review, consistent with the recommendation to make broader use of peer review within the program.

2. Issues related to modification of the Procedures Data Base.

- Action 1: DCAS will explore modifications of the Procedures database that would include information on the resolution of comments from all sources. DCAS will develop an estimate of the cost to implement such modification, and prioritize such an implementation relative to the implementation of other recommendations that result from the Program Review.

3. Issues related to Indirect Exposure Assessments.

- Action 1: DCAS will perform a trial run on one or two sites that will allow for the validation of the exposure assessment methodology used by DCAS in a completed program action. The Savannah River Site will be used for one of these trial runs.

4. Issues related to "Better" Characterization of Claimant Favorability.

- Action 1: DCAS will consider how best to undertake such a task and report back to NIOSH Leadership.

5. Issues related to Review of OTIB 0020.

- Action 1: DCAS will review as appropriate modify that OTIB.

6. Issues related Surrogate Data.

- Action 1: DCAS will undertake a detailed review of the EPA methodology. Consistent with efforts to diversify the accomplishment of program tasks. DCAS will invite "other than Health Physicists" to join in the performance of such a review.