

Management of Change Standard Operating Procedure

I. Purpose

The purpose of this Change Management Standard Operating Procedure is to mitigate risk associated with changing procedures and/or processes that may have adverse impacts on employee or student safety. This includes changes to equipment used to accomplish a task, as well as new employees or new task assigned to existing employees. This SOP refers to change management control which may be referenced in other on the job training procedures.

II. Scope

The intent of this is to manage changes to process chemicals, technology, equipment, procedures; and changes to facilities or organizational changes that affect a covered process. The Change Management program shall assure that the following considerations are addressed prior to any change or proposed change:

- impact of change on health, safety & the environment
- modifications to existing standard operating procedures
- notification and training employees affected
- necessary time for the change
- authorization requirements for the proposed change

Emergency actions to imminent health, safety or environmental issues are exempt from this procedure.

III. Responsibilities

The following list of employees has specific responsibilities assigned to them in accordance with the requirements of the MOC.

- Academic Administration:

Primary responsibility to maintain a safe work environment within their jurisdiction, by monitoring and exercising control over their assigned areas.

Assign a representative from each academic and administrative unit to ensure compliance with this procedure – Departmental Safety Coordinators (DSC).
Ensure MOC responsibilities are carried out in the academic departments or administrative units for which they are responsible.
Monitor implementation of the MOC program.

- Facility Management:

Assist with oversight of approved changes and addressing actions needed to implement those changes, as it affects equipment and the facility it resides.
Revise appropriate SOPs or facility procedures based on changes.

Inform contractors working on or around a covered process about the requirements of the MOC program or direct the contractor to the department contact.

Communicate MOC to affected employees within their area(s) of responsibility, as it pertains to departmental equipment.

- Department Supervisors:

Identify changes within their respective area(s) that are covered by the MOC program and initiate the MOC review process.

Collect appropriate background data associated with proposed changes necessary to evaluate the Safety Risks.

Initiate and ensure training is conducted to affected employees.

Take prompt corrective action when unsafe process safety conditions or practices are observed or reported.

Assist with oversight of approved changes and address any actions, as assigned.

- Departmental Safety Coordinator:

Coordinate/Assist with implementation of the MOC program within the work unit.

Ensure required training is provided to employees within the work unit.

Reporting Process Safety issues to appropriate management or EHS Department

- Safety Director – EHS Department:

Overseeing all aspects of this MOC program

Implementing and documenting training programs related to this SOP.

Assuring the appropriate SOP documentation is maintained on each change associated with a process or equipment.

Evaluate inventory and purchases for changes required.

Periodically reviewing the program and update the MOC process as appropriate.

Tracking and reporting program affects to administration.

Periodic auditing of compliance.

- Employees:

Adhering to the requirements of this program
Help implement or revise changes to equipment or task, as needed
Reporting process changes or safety issues to appropriate management or the safety office

IV. Procedure

1. Originators request a change to a task or piece of equipment.
Change is approved by the Department Supervisor.
2. Change proposed is discussed with the appropriate reviewers within a department.
Review approach should be developed based on the complexity of the proposed change: A major change that has a significant impact on process conditions or system parameters, including installation of new equipment, changes to design parameters (e.g., chemical inventory levels, temperature, pressure, flow, etc.), decommissioning equipment, and deviation from standard operating safeguards should be submitted immediately.
Safety Data Sheets (SDS) should be included if required, outlining specified requirements. Refer to the [Chemical Hygiene Plan](#) for all points of consideration.
3. Each proposed change must be evaluated on a case-by-case basis and by employees familiar with the covered process. For complex equipment/task change, a "What-If" Hazard Analysis may be warranted. For other process changes, an informal (site) EHS review may be needed, or a brief meeting may be needed to evaluate the change required.
4. EHS will review the proposed change and communicate any questions, clarifications, or concerns to the MOC originator. If there are substantial issues identified by the reviewer to the proposed change, notification to the originator will be made in writing (detailing the basis for the rejection). If the basis for the rejection cannot be reconciled, the originator will schedule a meeting with the department to review the technical basis for rejection and define an appropriate path to move forward. If the proposed MOC is acceptable, the department will sign and date the new MOC procedure and place effective.
5. During the review process EHS can request additional actions associated with the proposed change to assist in risk mitigation or maintaining appropriate safeguards currently associated with the covered process.
6. If a department supervisor deems their approval contingent upon some specific action, clarification, or modification, it will be noted accordingly. It is recommended that the specifics relating to the contingency is reviewed with the MOC Originator to assess overall impact to the change or the potential for an alternate approach.

7. The originator can only implement the proposed change after the department supervisor and EHS has approved the process. If at any time during implementation there is a deviation to original proposed changes, the approval must be withheld until all questions are answered and agreed before proceeding.
8. Once the MOC has been approved, originator will communicate the changes to other individuals, departments, or operating personnel that may be affected by the change. The type of communication method will be determined by the originator but can include posting the new Standard Operating Procedure in a commonly accessed area for employee notices, electronic distribution, or holding a brief “safety” meeting.
9. Included in this process is change induced training of all users. Training on new or change procedures should be approved by the department supervisor.
10. EHS will track MOC training completions by employees. In addition, the EHS Office must be sent a copy of the MOC training for 3rd party contractors, vendors or visitors to the area of change.

When products are tagged by inventory controls, a list will be generated and sent to EHS department monthly. This list will be reviewed monthly and the EHS Director will reach out to each department who has not provided MOC documentation for new equipment.

Safety and Health:

- If health and safety is of concern, Personal Protective Equipment (PPE), engineering controls, and/or work practice changes shall be implemented.
- [PPE Assessments](#) should be conducted in any areas where PPE is utilized or needed. EHS will assist in the assessment process.
- At a minimum SDS must be reviewed and provided if new items contain chemicals.
- Hazardous chemicals and/or reagents designated as such will be accompanied by Safety Data Sheets (SDS).
- SDS sheets removed from packages should be kept on file in employee recognized areas and a copy forwarded to EHS for confirmation of entry into database.