

memorandum

DATE: July 22, 2008

REPLY TO

ATTN OF: EM-961:Kadas

SUBJECT: **ENVIRONMENTAL MANAGEMENT PROCEDURE EM-3.3, REVISION 5,
"INTEGRATED ASSESSMENT PROGRAM" - APPROVED**

TO: Environmental Management Staff, EM-90

The subject procedure, see attached, is issued for your use. Please read and familiarize yourself with it. It will be placed onto the Office of Environmental Management's Office Policies and Procedures Webpage as soon as possible and will be available there for future reference, see <http://www.oakridge.doe.gov/External/Default.aspx?tabid=120>.

If you have any questions or concerns about this procedure, please contact Karen Kadas at 241-2224.



Stephen H. McCracken
Assistant Manager for
Environmental Management

Attachment

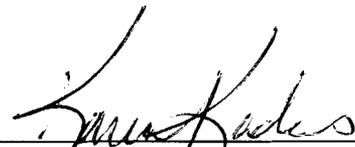


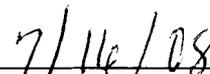
**U.S. Department of Energy
Oak Ridge Office
Office of Environmental Management
Procedure**

Integrated Assessment Program

**EM – 3.3
Revision 5**

Prepared:


Karen Kadas, Preparer


Date:

Approved:


Stephen H. McCracken,
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Date:

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LIST OF ACRONYMS

AL	Assessment Lead
AMEM	Assistant Manager for Environmental Management
AMESH	Assistant Manager for Environment, Safety, and Health
CA	Corrective Action
CAP	Corrective Action Plan
COR	Contracting Officer's Representative
CRAD	Criteria and Review Approach Document
DD	Division Director
DOE	U. S. Department of Energy
EM	Office of Environmental Management
ESH&Q	Environment, Safety, Health and Quality
FR	Facility Representative
IAS	Integrated Assessment Schedule
IVR	Implementation Verification Review
ORION	Oak Ridge Issues, Open Items, and Nonconformance Tracking System
ORO	Oak Ridge Office
PAT	Performance Assessment Team
PD	Project Director
PM	Program/Project Manager
PSOP	Project Safety Oversight Plans
QA	Quality Assurance
SME	Subject Matter Expert
SSC	Structures, Systems, and Components
TL	Team Lead
WL	Walkthrough Lead

1.0 PURPOSE

This procedure describes the roles, responsibilities, and basic processes to be used for the management of the DOE Oak Ridge Office (ORO) Environmental Management (EM) Integrated Assessment Program.

2.0 SCOPE

This procedure applies to all ORO EM divisions, programs, and projects. It includes the following assessment elements:

- Schedule Development
- Surveillances, Walkthroughs, and Oversight of Contractor Operations
- Formalized Assessments and Corrective Actions of Contractor Operations
- Safety Basis Changes and Implementation Verification
- Adequacy of Contractor's Implementation Verification Review
- Assessment of Significant Safety Systems
- Project Audits (in accordance with DOE O 413.1A)
- Trending and analysis of issues.

This procedure supercedes previous revisions of EM-3.3.

Assessment of startup and restart of nuclear facilities/activities is covered by DOE O 425.1C, *Startup and Restart of Nuclear Facilities* and EM procedure EM-2.1, *Startup and Restart of Oak Ridge Reservation Environmental Management Program Work*.

3.0 REFERENCES AND DEFINITIONS

3.1 References

- 3.1.1 DOE O 226.1A, *Implementation of DOE Oversight Policy*
- 3.1.2 DOE O 413.1A, *Management Control Program*
- 3.1.3 DOE O 414.1C, *Quality Assurance*
- 3.1.4 DOE O 425.1C, *Startup and Restart of Nuclear Facilities*
- 3.1.5 ORO O 410, Chapter III, *Quality Assurance*
- 3.1.6 ORO M 220.1, *Oak Ridge Office Assessment Program Manual*
- 3.1.7 ORO O 220, Chapter XII, *Project Safety Oversight Plans*
- 3.1.8 EM Procedure EM-2.1, *Startup and Restart of Oak Ridge Reservation Environmental Management Program Work*
- 3.1.9 EM Procedure EM-2.2, *EM Safety System Oversight*
- 3.1.10 EM Procedure EM-3.2, *Facility Representative Program*

3.2 Definitions

Refer to ORO M 220.1, Definitions, for terminology used in this procedure. For EM-3.3 specific terminology, not included in ORO M 220.1, see below

- 3.2.1 Safety Structure, Systems, and Components: Those systems that have been credited in the DSA documents as controls that perform important roles to protect the health and safety of

the public, workers and the environment. The following are examples:

- Confinement ventilation systems
- Active portions of fire protection systems
- Glovebox systems
- Criticality monitoring systems
- Radiation monitoring systems
- Continuous air monitoring systems

3.2.2 Surveillance: A focused assessment/observation of a specific work activity or work product of a contractor or of DOE. It is typically more rigorous than a walkthrough but less formal than an assessment. Surveillances are comprised of the following elements:

- Covers a specific topic
- The topic covered must have a basis (Order, Standard, Guide, Procedure, etc.)
- They are usually scheduled (This does not preclude emerging issues)

4.0 ROLES AND RESPONSIBILITIES

4.1 Assistant Manager for Environmental Management (AMEM)

Comply with Assessment Program roles and responsibilities identified in ORO M 220.1.

4.2 Contracting Officer's Representative

4.2.1 Approve and transmit direction to the Contractor regarding corrective actions to address the findings from walkthroughs and assessments of EM Contractors.

4.3 Federal Project Directors/Division Directors

4.3.1 Provide input to the Quality Assurance Division Director in the development and maintenance of the EM Integrated Assessment Schedule (IAS) and ensure that Project Safety Oversight Plan (PSOP) needs are reflected in the IAS.

4.3.2 Ensure participating personnel comply with the requirements of this procedure and ORO M 220.1.

4.3.3 Ensure that a Walkthrough/Surveillance Program is implemented in accordance with ORO M 220.1.

4.3.4 Review Issues Trending reports to establish oversight priorities.

4.3.5 Periodically review closed issues to determine the need for effectiveness reviews and schedule such reviews as necessary.

- Effectiveness reviews are required for Priority 1 issues and for those Priority 2 issues determined by the FPD to significantly impact safety or compliance.

4.3.6 Provide the SME/technical support necessary to develop and execute the EM IAS.

4.3.7 Ensure ORION is utilized for documenting surveillances, walkthroughs, assessments, corrective action plans, and corrective action completion.

4.4 Quality Assurance Division (QAD) Director

- 4.4.1 Act as the AMEM's assessment program manager.
- 4.4.2 Manage and maintain the EM IAS.
- 4.4.3 Through the Federal Project Directors (FPD)/Division Directors, ensure all applicable ORO EM personnel are familiar with the requirements of this procedure and ORO M 220.1.
- 4.4.4 Monitor the conduct of the EM Integrated Assessment Program.
- 4.4.5 Ensure quarterly summary status reports of overdue EM Contractor corrective actions are provided to EM management.
- 4.4.6 Ensure that issues are reviewed regularly for trends and raised to the FPDs/Division Directors and AMEM as appropriate.
- 4.4.7 Provide input to the Projects' walkthrough/surveillance schedule and focus.
- 4.4.8 In conjunction with the FPD/Division Directors and Program/Project Managers, ensure ORION is utilized for documenting surveillances, walkthroughs, assessments, corrective action plans, and corrective action completion.
- 4.4.9 Provide technical support as necessary to execute the IAS.

4.5 Program/Project Manager

- 4.5.1 Give input to the QAD Director, through their respective FPD/Division Director, on the development and review of the EM IAS and the Project's/Division's Walkthrough Surveillance Schedule .
- 4.5.2 Monitor the results of assessments and/or walkthroughs for their facilities/projects.
- 4.5.3 Review and recommend approval/rejection of Contractor corrective action plans (CAPs) after considering line, SME, and other technical support input.
- 4.5.4 Ensure CAPs and/or corrective actions for walkthroughs and assessments are entered into ORION.
- 4.5.5 Monitor the closure of corrective actions to ensure they meet the CAP, are closed in a timely manner and are effective.
- 4.5.6 Verify/validate the closure of Contractor corrective actions in accordance with Corrective Action Plans.
- 4.5.7 Ensure changes to CAPs and/or corrective actions are approved at the same level as the original, are tracked until closure, and that closure basis is documented.
- 4.5.8 Participate in at least one assessment and/or walkthrough per quarter and ensure that it is documented in ORION.

4.6 Assessment/Walkthrough Lead

- 4.6.1 With support from the FPD/Division Directors and Program/Project Managers, select and schedule the personnel necessary to conduct the assessment/walkthrough.
- 4.6.2 Comply with requirements of ORO M 220.1, Section 5.0 for the conduct of assessments and ORO M 220.1, Section 7.0 for the conduct of walkthroughs.
- 4.6.3 Assemble and maintain assessment evidence files that are consistent with the scope of the

assessment as appropriate. Evidence files are not required for walkthroughs.

- 4.6.4 Prepare walkthrough and assessment reports. Ensure that these are entered into ORION.
- 4.6.5 Transmit walkthrough and assessment reports to the appropriate FR, PM, and FPD/Division Director. Transmit reports to the Contractor via the COR, as appropriate.

4.7 Assessment Team Members

- 4.7.1 Participate fully, as required, to support the scope of the assessment.
- 4.7.2 Comply with the Assessment Team Member Duties identified in ORO M 220.1, Attachment 1.

5.0 PROCEDURE

The following sections provide direction to all personnel who participate in the EM integrated assessment program.

5.1 EM Integrated Assessment Schedule

- 5.1.1 An EM Integrated Assessment Schedule is developed and maintained by QAD and includes environment, safety, health, quality, and business management activities. The schedule shall be populated with the needed assessment topics taking into account input from the FPDs/Division Directors and Program/Project Managers. The following shall be considered when developing the schedule.
 - 5.1.1.1 The schedule should envelope a 36 month time frame based on a fiscal year format (October to September).
 - 5.1.1.2 The schedule shall focus on the next 12 months.
 - 5.1.1.3 The schedule shall take into account requirements identified in the Three Year Plan.
- 5.1.2 Route the completed schedule to the FPD/Division Directors and Program/Project Managers for their review of assessment topics and resource loading.
- 5.1.3 Make changes as appropriate to address comments and route to the Assistant Manager for Environmental Management for approval and transmittal to affected organizations
 - 5.1.3.1 Send copies of the schedule to staff and field personnel as applicable.
 - 5.1.3.2 Enter the schedule into ORION.
- 5.1.4 The schedule shall be reviewed and updated at least annually to document the completion of assessment topics and/or edit the assessment schedule and reallocate resources based on changing requirements and needs.
- 5.1.5 A revised schedule must reflect a change in revision and be approved prior to being reissued.

5.2 Surveillances of Contractor Operations

- 5.2.1 A Surveillance Program schedule should be developed at the Project Director and Team Lead level and may be incorporated into the PSOP and/or ORION. Issue trending analysis should be used in development of the schedule.
 - 5.2.1.1 The schedule shall include the topic for surveillance, the basis for surveillance, and the Surveillance Lead (by name or title) responsible for conducting the

surveillance.

- 5.2.1.2 Topics should be scheduled and conducted at two month intervals.
- 5.2.1.3 Management can identify and add to the schedule any emergent topics that require surveillances.
- 5.2.2 The schedule should be made available to EM Management.
- 5.2.3 The Surveillance Lead shall conduct the surveillance in accordance with DOE O 226.1 and this procedure.
- 5.2.4 The assigned Surveillance Lead should coordinate and schedule additional SME and technical support as needed to perform the surveillance.
- 5.2.5 Surveillance topics shall have a basis for conducting the surveillance. Checklists or lines of inquiry should be utilized. Surveillance checklists are available on the ORO Safety First website (<http://www-internal.oro.doe.gov/esq/safetyfirst/Links.htm>). Checklist or lines of inquiry that are utilized should be identified when an ORION entry is made.
- 5.2.6 The Surveillance Lead shall ensure that the walkthrough and any subsequent findings are documented in ORION. The findings shall be appropriately entered into ORION as issues rather than noted in the comment field.
- 5.2.7 For each Priority 1 or 2 issue entered into ORION, the appropriate manager shall be included on email distribution. This will serve as the opportunity for acknowledgement by the manager. If no response is received, the surveillance lead may assume that the manager has acknowledged the issue.
- 5.2.8 If there are any Priority 1 or 2 findings, a cover letter shall be drafted by the Surveillance Lead for COR transmittal of the ORION surveillance report to the Contractor. Findings from multiple surveillances conducted during the month may be combined into one letter.
 - 5.2.8.1 The cover letter shall include a request for a Corrective Action Plan to include the following at a minimum:
 - A determination of the extent of the deficiency.
 - A corrective action schedule with specific activities as appropriate and the individual responsible.
 - A corrective action schedule with specific activities as appropriate and the individual responsible.
 - Immediate or interim corrective actions if resolution is long term.
 - Direct and contributing causes.
 - Root causes if the issue is considered systemic.
 - Direction to provide a CAP, generally within two weeks from the date of the letter. This should be considered a goal and not a mandate.
 - Request notification and closure evidence when the contractor has closed an issue.

5.3 Walkthroughs of Contractor Operations

- 5.3.1 The Walkthrough Lead shall conduct walkthroughs in accordance with ORO M 220.1 and this procedure.
- 5.3.2 Walkthroughs are conducted on an as needed basis, as deemed necessary by any member of the Environmental Management technical oversight organization that are assigned to provide oversight for a project, area(s), or facility(s).

- 5.3.3 Walkthroughs do not typically require a predetermined schedule, basis, or checklist for performance. They are a means for EM technical oversight staff (at any level) to walk their appointed/assigned spaces in an unannounced and unencumbered fashion to monitor contractor activities.
- 5.3.5 Walkthroughs should be identified in ORION as an ISMS general walkthrough unless an issue is identified and then the issue(s) should drive the walkthrough category.
- 5.3.6 The Walkthrough Lead shall document the walkthrough and any subsequent findings in ORION. The findings shall be appropriately entered into ORION as issues rather than noted in the comment field.
- 5.3.7 For each Priority 1 or 2 issue entered into ORION, the appropriate manager shall be included on email distribution. This will serve as the opportunity for acknowledgement by the manager. If no response is received, the walkthrough lead may assume that the manager has acknowledged the issue.
- 5.3.8 If there are any Priority 1 or 2 findings, a cover letter shall be drafted by the Walkthrough Lead for COR transmittal of the ORION surveillance report to the Contractor. Findings from multiple walkthroughs conducted during the month may be combined into one letter.
- 5.3.8.1 The cover letter shall include a request for a Corrective Action Plan to include the following at a minimum:
- A determination of the extent of the deficiency.
 - A corrective action schedule with specific activities as appropriate and the individual responsible.
 - A corrective action schedule with specific activities as appropriate and the individual responsible.
 - Immediate or interim corrective actions if resolution is long term.
 - Direct and contributing causes.
 - Root causes if the issue is considered systemic.
 - Direction to provide a CAP, generally within two weeks from the date of the letter. This should be considered a goal and not a mandate.
 - Request notification and closure evidence when the contractor has closed an issue.

5.4 Formal EM Assessments (Attachment B, Parts I and II)

- 5.4.1 Assessments shall be conducted in accordance with ORO M 220.1 and this procedure with the exception of readiness reviews which are conducted in accordance with DOE O 425.1C and EM-2.1. Further direction on assessments of safety systems is provided in EM-2.2.
- 5.4.2 Formal assessments require greater planning than walkthroughs. The planning will encompass the schedule, guidelines for conduct, and report writing. EM assessments may include the following subject areas:
- Assessments and Corrective Actions of Contractor Operations
 - Safety Basis Changes and Implementation Verification
 - Adequacy of Contractor's Implementation Verification
 - Assessment of Safety Significant Systems
 - Project Management and Business Systems
 - Management Assessments, including functional and self assessments

- 5.4.3 The Assessment Lead shall coordinate and schedule the SME and technical support required to make-up the assessment team and conduct the assessment. For Safety basis change and IVRs, the cognizant facility representative and program/project manager should be included on the review team.
- 5.4.4 Assessments shall be of sufficient scope, duration, and frequency to ensure that ORO EM and Contractor operations are accomplished in a safe manner and within cost, schedule, and scope.
- 5.4.5 The organization to be assessed should be notified by the Assessment Lead at least two weeks in advance of the assessment.
- 5.4.6 Assessments shall be performed according to an assessment plan that is prepared by the Assessment Lead, with concurrence from the responsible manager, in advance of the assessment.
- 5.4.7 The assessment plan should contain the following:
- Objective: a brief statement of what the assessment is to accomplish.
 - Scope: a brief summary of the topical areas that will be covered during the assessment, and the depth to which each will be covered.
 - Assessment Methods: a listing of the planned date(s) of the assessment, team members, areas of review for each team member, general assessment techniques, and methods for issues communication during the conduct of the assessment.
 - Listing of Performance Criteria References: applicable requirements, regulations, DOE Orders, procedures, and/or industry standards. For safety basis change and implementation verification reviews, the Contractor's Implementation Plan shall serve as the basis for the validation criteria. DOE may include additional requirements if not adequately addressed by the Contractor's Implementation Plan.
 - Listing of Lines-of-Inquiry
 - Reporting Methods: a brief summary discussing the format of the assessment report and when draft and final reports will be released.
- 5.4.8 The Assessment Lead shall conduct an in-brief covering the scope with the organization being assessed at the start of each assessment.
- 5.4.9 Assessment team staff must document the results of the assessment lines-of-inquiry using a checklist, a logbook, or similar. All documentation will be of sufficient detail to reconstruct the activity being observed as well as the inspection logic.
- 5.4.10 During the assessment, if any activities are noted that represent an imminent threat to worker safety, or environmental protection, the assessor will alert the participants of the assessed activity to Stop Work. The assessor will then immediately notify the affiliated DOE and Contractor program/project managers and the DOE Facility Representatives.
- 5.4.11 For assessments that last more than one day, the opportunity for routine feedback meetings should be offered to the assessed organization by the Assessment Lead. At these meetings, the Assessment Lead should provide a status on the conduct of the assessment as well as any findings, observations, and proficiencies that have been identified.
- 5.4.12 Upon completion of the assessment, an out-brief shall be held with the assessed organization. At this meeting, a summary of the assessment results will be presented by the Assessment Lead. The time frame for delivery of the assessment report will also be discussed during this meeting.
- 5.4.12.1 Appropriate DOE and Contractor personnel shall be invited to the closeout meeting (e.g. FPD, Program/Project Lead, Facility Representative, Contractor

Facility Manager, etc.).

- 5.4.13 All assessments require a formal report. The report is prepared by the Assessment Lead with input from the team staff.
- 5.4.14 The content of the report should include:
- Audit objective
 - Scope covered during the assessment
 - Methods of performance
 - Results, including proficiencies, findings, and observations.
 - For safety basis change and implementation verification reviews, the report shall include a conclusion on the adequacy of the Contractor's Implementation Verification Review and the recommendation to approve operation under revised safety basis document or list of prerequisites and closure criteria..
- 5.4.15 A memo to the AMEM shall be drafted by the Assessment Lead for self assessments. For assessments of a contractor, a letter shall be prepared for COR transmittal if there are any Priority 1 or 2 findings to communicate to the Contractor. The cover letter shall include a request for a Corrective Action Plan to include the following at a minimum:
- A determination of the extent of the deficiency.
 - A corrective action schedule with specific activities as appropriate and the individual responsible.
 - Immediate or interim corrective actions if resolution is long term.
 - Direct and contributing causes.
 - Root causes if the issue is considered systemic
 - Direction to provide a CAP, generally within 30 days from the date of the letter. This should be considered a goal and not a mandate.
 - A courtesy copy of the report should be transmitted to the Contractor Project or Facility Manager.
- 5.4.16 As a general rule, the Assessment Lead should submit the official assessment report to the, FPDs, Project Managers, and Contractor within 2 weeks of the assessment closeout meeting and enter issues into ORION. Receipt and/or approval of the cover memo/letter shall serve as management acknowledgement of Priority 1 and 2 findings for entry into ORION.
- 5.4.16.1 Any corrective actions that were taken during the assessment and are listed in the assessment report must also be entered in ORION.

5.5 Receipt of Corrective Action Plans

- 5.5.1 When a CAP is received it shall be evaluated by the Program/Project Manager and Assessment or Walkthrough Lead for comment and/or approval.
- 5.5.1.1 The Assessment or Walkthrough Lead will review the CAP for appropriate corrective actions and comment as needed and forward the CAP to applicable FPDs and Program/Project Managers for review and comment.
- 5.5.1.2 The Program/Project Manager shall review the CAP and comment as needed. Review comments shall also be assembled from the FPD for comment resolution.

- 5.5.1.3 The Program/Project Manager shall coordinate the resolution of any comments. The Assessment Lead should assist with the comment resolution as requested.
- 5.5.2 When comments to the CAP have been resolved the Program/Project Manager shall ensure the CAP is entered into ORION.
 - 5.5.2.1 If it is a Contractor's CAP, the tracking ID from their tracking database can be referenced in ORION instead of repeating the corrective action description.
 - 5.5.2.2 If the Contractor does not have a tracking database then the corrective action must be repeated in ORION.
- 5.5.3 The Program/Project Manager shall ensure the CAPs are tracked to closure and closed out in ORION when they are completed. Adequate closure documentation must be noted in ORION and may be attached.
- 5.5.4 If a Contractor requires an extension to the CAP date or description, the Project Manager shall review and approve the revision as appropriate.
 - 5.5.4.1 ORION shall be updated as needed to address the approved changes requested by the Contractor.
 - 5.5.4.2 Revisions to the CAP shall be reported to management.
- 5.6 Training, Qualification, and Experience Requirements**
 - 5.6.1 Personnel conducting walkthroughs and assessments shall meet requirements of ORO M 220.1 and understand the requirements of this procedure.
 - 5.6.2 Lead Assessor/Auditor must have the attributes, skills, and experience to manage all phases of the assessment.
- 5.7 Issue Trending and Analysis**
 - 5.7.1 An ORION Issues Report and Trending Report is issued quarterly by AMESH. These shall be reviewed by the QAD and Issues and Trends needing senior management attention will be presented at the Project Performance Review Meetings.
 - 5.7.2 The Issues and Trending Report provides an overview of the previous quarter and year issues by functional area as defined in ORION. The issues will be further binned by Project and by Contractor. These reports will be distributed to the FPD/Division Directors for use in prioritizing oversight activities.

6.0 RECORDS

6.1 Program Records

- 6.1.1 Records generated as a result of implementation of this procedure include, but are not limited to:
 - 1. Assessment Plans
 - 2. Completed Lines-of-Inquiry or Checklists (as applicable)
 - 3. Attendance Sheets
 - 4. Assessment Reports
 - 5. Corrective Action Plan
 - 6. Correspondence on changes to CAPs, including extensions and rejections
 - 7. Letters requesting Corrective Action Plan
 - 8. CAP approval letters

9. Evidence files for corrective action closure
 10. Any other assessment correspondence
 11. Issues and Trending Reports
- 6.1.2 Records shall be maintained in accordance with the established ORO EM Records Management System.

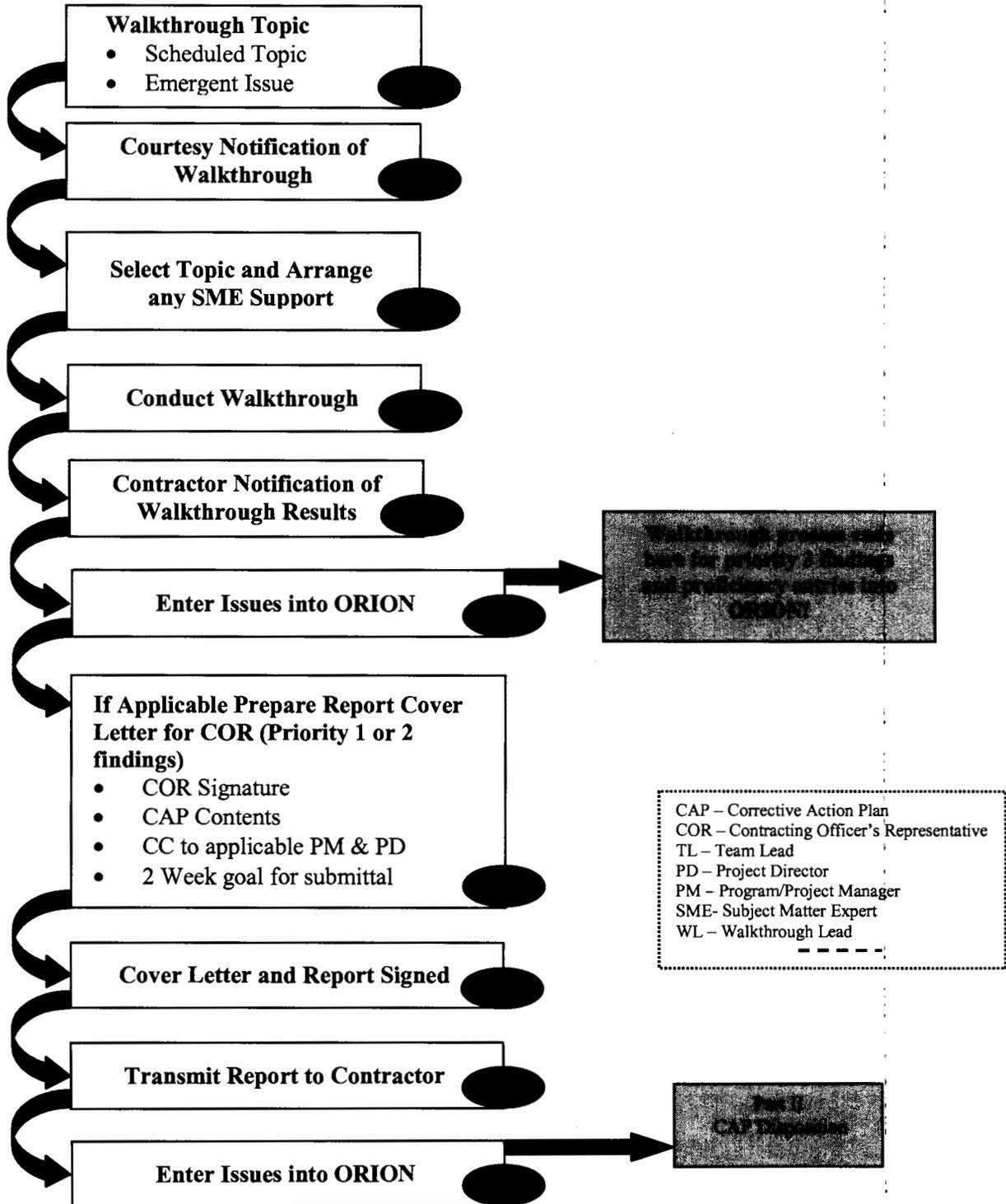
7.0 ATTACHMENTS

- ATTACHMENT A, Walkthrough Flow of Work and Responsibilities Part I, Walkthrough Preparation and Conduct
- ATTACHMENT A, Walkthrough Flow of Work and Responsibilities Part II, CAP Disposition
- ATTACHMENT B, Assessment Flow of Work and Responsibilities, Part I, Assessment Preparation and Conduct
- ATTACHMENT B, Assessment Flow of Work and Responsibilities, Part II, CAP Disposition

ATTACHMENT A

Walkthrough Flow of Work and Responsibilities

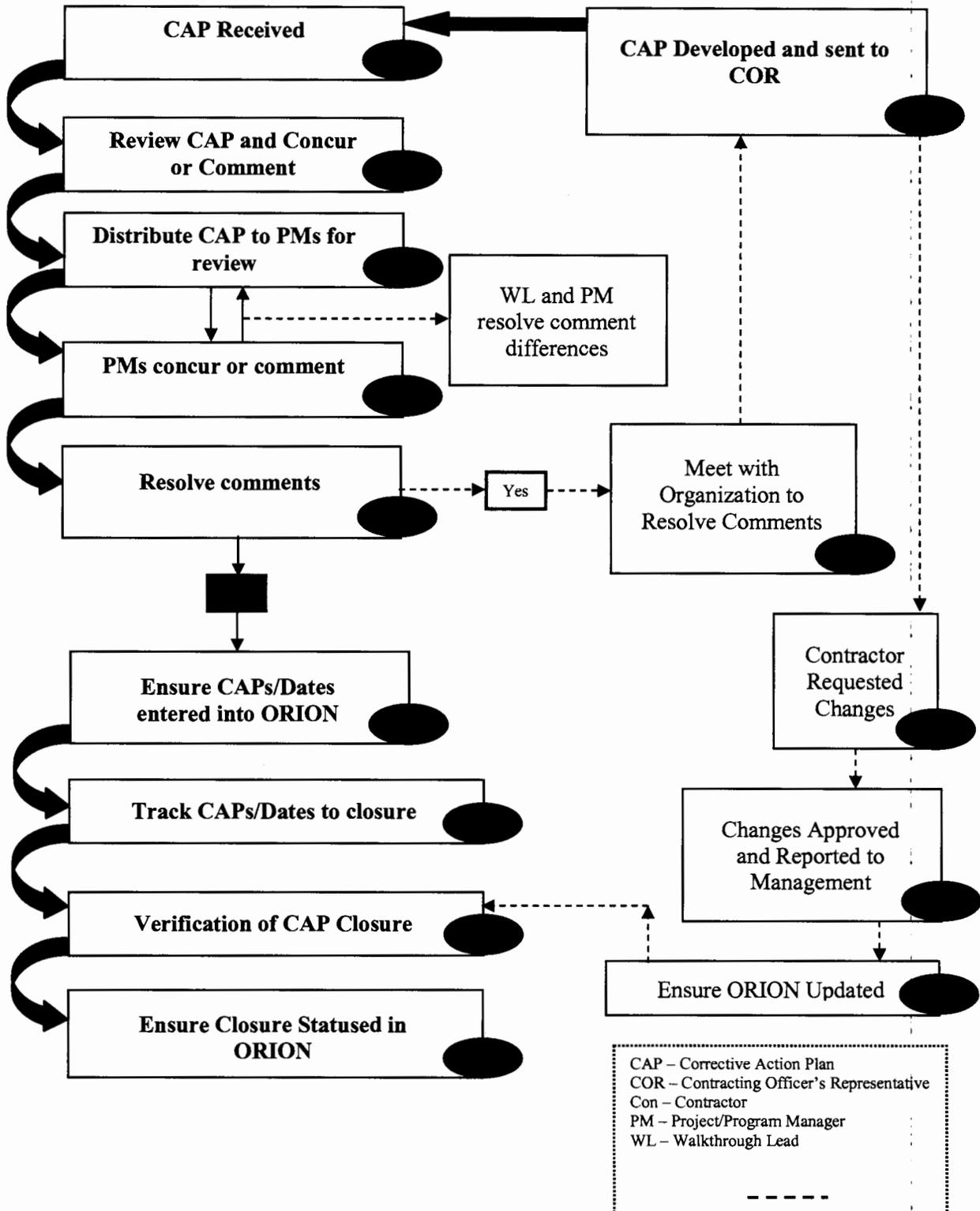
Part I - Walkthrough Preparation and Conduct



ATTACHMENT A

Walkthrough Flow of Work and Responsibilities

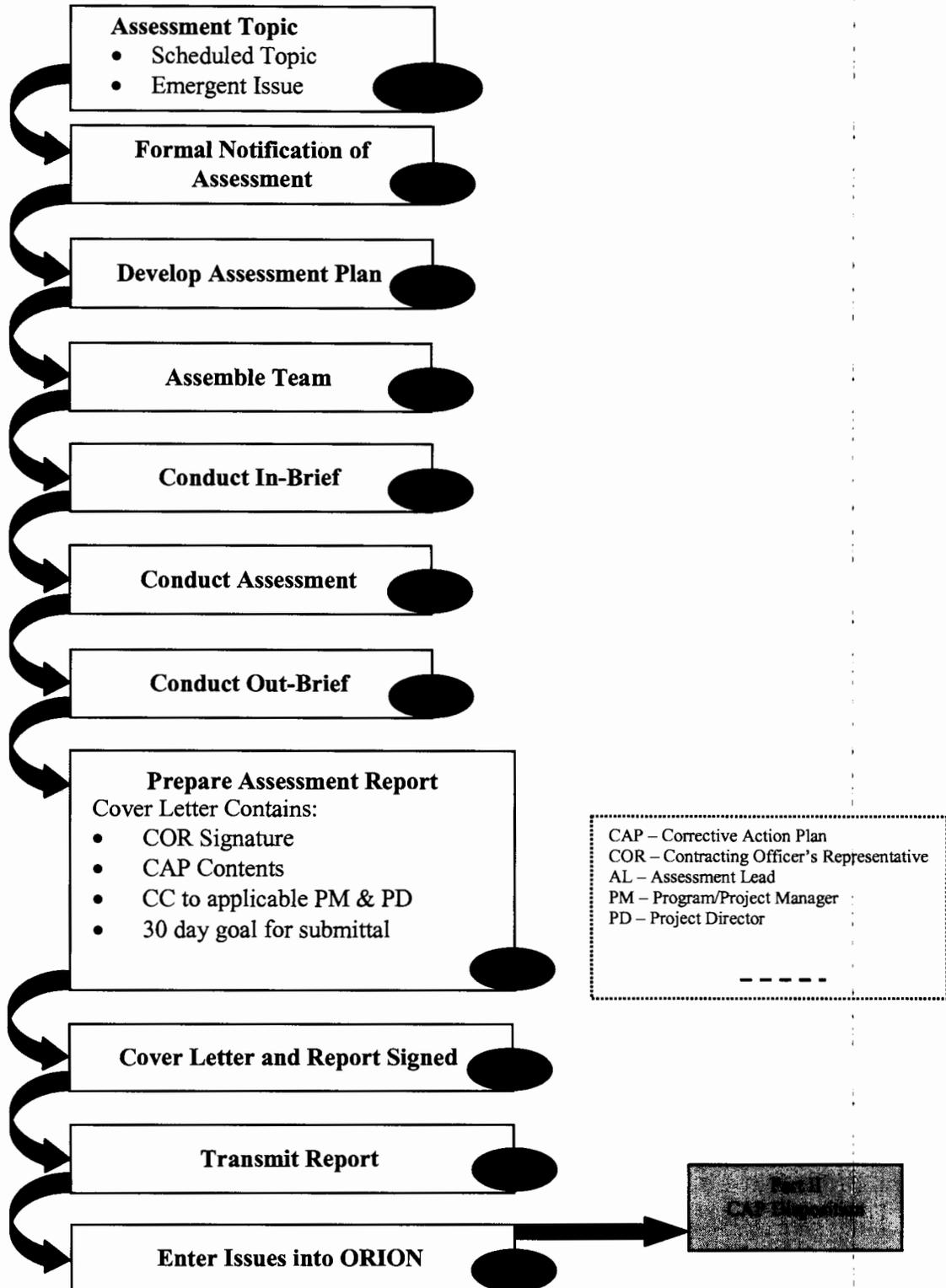
Part II - CAP Disposition



ATTACHMENT B

Assessment Flow of Work and Responsibilities

Part I - Assessment Preparation and Conduct



ATTACHMENT B
Assessment Flow of Work and Responsibilities
Part II - CAP Disposition

