

Management of Change Program

Policy Type: Health & Safety

Status: DRAFT ☐ APPROVED ☐

Owner: Department Heads

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Purpose:

Management of Change (MOC) is a control strategy to ensure that all changes will provide the intended benefits without causing injury to any employee and contractor or reduction in process reliability. The Management of Change program ensures that all changes to people, equipment and processes are addressed, plans developed, training provided and follow- ups and documentation completed.

Scope:

All hourly and salaried employees are included under this program. Contractors, vendors, consultants and visitors are also included when and where appropriate.

The Management of Change process shall or shall not be used in the following circumstances:

MOC applies:	MOC does NOT apply:
• When new equipment, operations, or facilities are to be used, • When new materials are to be used, • When equipment (not replacement-in-kind) or technological alterations are made, • Upon the introduction of a new s supply chemical, • When process control changes are made, • When significant organizational or policy changes that impact the operation of facilities or the utility systems the organization are made, • Changes, which affect personnel safety and process safety, • Changes which affect environmental conditions, • Process changes in temperature, pressure, flow rates, etc.	• A adjustment that satisfies design specifications • A adjustment that satisfies operating parameter ranges • When minor PLC changes are made, • When maintenance and operations tuning and troubleshooting are conducted, • For equipment and parts replacement-in-kind (same in function and application) • For in-kind additive or raw material changes, • For minor equipment modifications such as guarding, control panel changes, minor parts, etc.

Management of Change Program

Definitions:

Notification of Change (NOC) – A process to inform employees affected by change once the change has been reviewed and approved by the working group for industrial control system process changes. A NOC form will be used to communicate changes to affected employees.

Unit Manager / Sponsor – Supervisor of Facilities' Shops, EHS, OIT, or P-3.

Initiator – Person or persons who proposes a change.

Process Owner – the Management of Change process is owned by the management of unit affected by the change, who will ensure that proposed projects or changes receive the proper review.

Register – a list of MOC documents that have been initiated. The MOC Register is kept on the MDF Facilities' web site.

Department Heads – Employees the oversee units, departments and or operations. Department Heads include the following: Utility Energy Plant Manager, Director for Utility Services Contractor, Utility Services Electrical Engineer, Architectural and Engineering Service Director, Office of Technology Services Director, Environmental Health and Safety Manager, Director of Facilities and Maintenance Operations, Emergency and Security Director, Utility P-3 Director, and Housing and Residences Director.

Industrial Control System Process Working Group (ICS Working Group) – Working group will consist of the Director of Facilities Maintenance and Operations, HVAC Shop Foreperson, OIT representatives, Risk Management representatives, Utility Services P3 Director, and representatives for Utility Services contractor.

Resources – The university and Utility Services contractor may use other university units, outside vendors and or contractors. Notification of Change for Resources processes, equipment, products and technologies must be processed in the same manner as a university or Utility Service contractor. The Process Owner will work with the Resource to develop a NOC and submit the information to the ICS Working Group for review and processing.

MOC Changes

Responsibility:

Implementation of **MOC** is the responsibility of the Process Owner and Department Heads. Responsibilities include conducting a risk assessment to the proposed changes, development of safety and work plans (SOPs, JSA's, etc.), obtaining approval of the process for change, communication and follow-up on the changes.

The Process Owners are responsible for training employees and or Resources on change and communicating those changes using the Notification of Change process.

All employees and or Resources are responsible for understanding what triggers a management of change and to follow process if an MOC is triggered.

Management of Change Program

MOC Elements

- Phase 1:
 - A hardcopy form that starts the MOC process. It is completed and filled out by the Initiator and approved by a Unit Manager / Sponsor.
- Phase 2:
 - The electronic MOC Form that is developed and routed to affected Unit Manager for completion. Unit Manager sends to Department Heads to initiate the review and approval process.
- Phase 3:
 - Notification of Change (NOC) form.

MOC Steps

1. Employee proposing the change or proposing the change on behalf of a Resource (Initiator) will complete Management of Change form (*Phase 1, sections A. – D*) with assistance and approval of Process Owner (A Process Owner is the Initiators Supervisor).
2. Process Owner will send a notification email to the Unit Manager that an MOC has been initiated and attach the MOC form with Phase 1 completed.
3. The Unit Manager complete section E. (*Phase 2*) and send a notification email to all affected Department Heads to review applicable sections.
4. Department Heads will review the MOC by completing section F. and making modifications to change, assignment correction actions, and completion dates as needed. Department Head will email back MOC changes and approval to Unit Manager to work with Process Owner for implementation signifying initial review is complete.
5. Unit Manager will review outstanding MOC(s) Department Head approvals weekly to get status updates from Department Heads for pending reviews.
6. Once MOC has Department Head initial approval, (Phase 3) Unit manager will work with Process Owner for completion.
7. Unit Manager will prepare NOC form and email Process Owner.
8. Process Owner will review completed MOC form and notify all affected employees by using the NOC form. NOC form needs to be signed and dated by all affected employees. A copy of the NOC form also needs to be posted in affected employees work station for 30 days.
9. Process Owner will route the completed NOC(s) to Unit Manager, Department Heads for final review and verification that the items are completed.
10. Superintendents will send out final communication that all items are complete and to execute change.
11. Original MOC form will be filed with Facilities as the repository of the record.

Pre-Startup Safety Reviews:

It is critical that new or modified equipment be inspected prior to start-up to ensure that hazards

Management of Change Program

are identified. To accomplish this an inspection will be completed using a Safety Start-Up checklist.

The affected Department Heads will include and review the Pre-Startup Safety checklist to ensure all safety items are met.

Training:

All employees and Resources are required to go through Management of Change training by the Process Owner and as required if changes occur to the program. The Process Owner will supply to the Unit Manager the attendance list with a copy of the NOC covered after the training has occurred. The Process Owner is responsible for ensuring and monitoring employees and Resources for understanding and implementation of MOC.

Audit Guidelines:

The ICS Working Group will audit the Management of Change program annually. Any change developed by the group will be updated on the Facilities website and notice of the change sent to Department Heads and Unit Managers.

Emergency MOC:

Sometimes there is no choice and a change has to be made without the full approval process. In this case an Emergency MOC procedure is followed. In a situation where normal operations do not resume after the emergency change, a full MOC evaluation should be completed.

- Need a contingency plan – what alternative is taken place and for a specified time.
- Evaluate using available skills and resources – focus on immediate risks only.
- Close out emergency MOC when normal operations resume.

Temporary MOC:

Temporary MOCs must have a specified time limit with an expiration date. If the change is not returned to its original condition, a full MOC must be completed. Examples of temporary changes are conducting trials and bypassing equipment.

Exemptions:

- There are no exceptions.

Revision Log:

University of Idaho

Management of Change Program

	Revision Date	Description	
	Original Implement	Original Implement DATE	