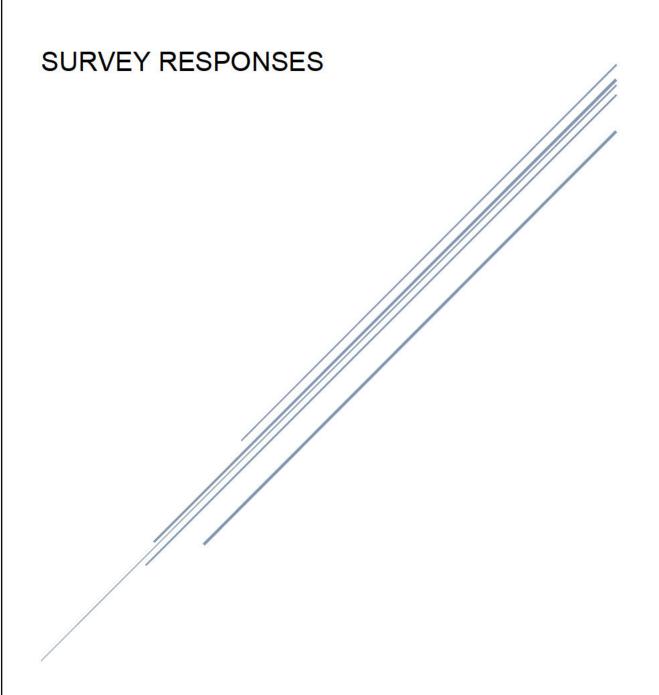
# OCSPP LOOKING FORWARD: A CLIMATE ASSESSMENT

**BACKGROUND DOCUMENTS** 

- > SURVEY RESPONSES
- > LISTENING SESSION NOTES
- > INTERVIEW NOTES

# OCSPP LOOKING FORWARD: A CLIMATE ASSESSMENT



# SURVEY RESPONSES

### 10/12/2021 and 10/26/2021

**Note:** The survey responses from the 29 participants are verbatim except for minor grammatical and spelling edits.

# 1. What makes you feel good about your work and workplace?

- 1. I work with many intelligent and hard-working scientists who want to make a difference.
- 2. For the past year and a half, working at home. But not much else over the past few years as the workload is unrealistic and unmanageable. The things that make a job rewarding are autonomy (about significant aspects of the work), intellectual challenge, and the support of upper management. For the past few years, we have been treated like low-level drones doing as we are told, per SOPs and protocols. Management does not have our backs.
- A feeling of trust between myself and my supervisor. A place where you can freely discuss ideas without fear of management putting them down.
- 4. Positive affirmation for a job well done.
- 5. My coworkers, RMB management, and RAB staff. I trust my RMB team leaders and branch chiefs. With my coworkers, we have a fun and supportive atmosphere. I also feel good about the mission of protecting human health and the environment from possible risks from new chemicals.
- 6. Since about March of this year, work has been dysfunctional, stressful, and hostile. There is virtually nothing good about this environment. Even logging on or seeing that I have an email from certain people in the division causes my blood pressure to rise in anxious anticipation of more workplace drama.
- 7. Knowing that the Agency I work for has a mission that resonates with my values- to help protect environmental and public health.
- 8. Positive support from my peers and supervisors for my thoughts and care in the work I do. Being acknowledged for upholding a standard of excellence in protecting human health. Even I have never received any praise from (b) (b) (6) for the work I do, I know that the work I do protects myself and others to ensure that my family, my community, and the greater world can have access to clean safe water, air, and land to thrive on. This brings me immense joy to serve them in this way.

- 9. EPA's mission of protecting health and the environment. My coworkers. My immediate supervisor.
- 10. When colleagues (including management) treat each other with respect, openly share information and expertise for collaboration, and when mental energy can be spent on meeting EPA's mission, not worrying about harassment in the workplace.
- 11. Delivering completed work products regularly. Continuously improving myself and the work environment. Helping others.
- 12. Being able to use science to protect human health and the environment. Working with very talented scientists and engineers to address big and small issues related to chemical exposure and effects.
- 13. The people. Everyone around me is incredibly hard-working, smart, and wants to do a good job. We also have great branch chiefs.
- 14.I enjoy collaborating with my co-workers. I also truly love what I do. I feel like I have made an impact.
- 15. Many of my colleagues inspire me every day with their dedication to the Agency's mission and their passion for science and doing the right thing. I feel like OCSPP has this incredibly powerful role to play in protecting human health and the environment. While much of this potential remains untapped, it's exciting to think that there are many opportunities to do better and to grow, and a chance to see that happen from the inside.
- 16. The belief that my work will help protect human health and the environment and my hard-working, intelligent, and kind colleagues make me feel good about my work and workplace.
- 17. The importance of being valued by my colleagues and management, working in a warm, friendly, and collaborative work environment; being engaged in a team and work while performing my job; recognized and respected for my talents and skill set; having friends at work; cleaning up the environment as a result of doing my job; not feeling anxious or stressed out; having a work-life balance. What also makes me feel good about my work and workplace is the ability to share with customers or outside parties my knowledge and experience because I like to help people and find it rewarding.
- 18. The mission. If I take a moment and step back to look at what the work I am doing might accomplish, I take pride in it. I notice this when talking to potential new hires or students interested in our work. Yet, this becomes very hard to recognize in the day-to-day. While I can draft an inspiring/impressive blurb about my work, the daily tasks and pace of work can quickly make the highlight reel of my work feel like a complete distortion of

- the truth. I can tell myself that I feel good about my work, but do I? Depends on the day (or hour).
- 19. Not much. OPPT is chaos. Most staff believe that they are not protecting the public and decisions favor industry instead.
- 20. When I joined the NCD in OPPT, my expectation was very high because I was standing in the core sector to protect the American public and environment. But now I am failing all my excitement for the EPA, my duties, environmental justice for the public, and even as a human being. I am so exhausted and worn out due to the harsh environment.
- 21. Supportive, fun, coworkers as well as trusting and supportive supervisors. The work environment and communication matter. Regular morale boosters/team building make a difference.
- 22. I believe in the mission of EPA and public service. I like the idea of the new chemicals program and what is it supposed to do.
- 23. The staff I work with is incredible, hard-working, kind people.
- 24. Absolutely nothing!!
- 25. My direct coworkers and supervisors.
- 26. I feel good knowing that I have a role in carrying out EPA's mission to protect human health and the environment. Even though challenging, I also really enjoy utilizing my background in toxicology to conduct exposure assessments and to develop human health hazard assessments and human health risk assessments. I also enjoy collaborating with many knowledgeable team members.
- 27. What makes me feel good about work is a sense of purpose and working in a community of talented scientists to support the mission of the Agency. As a member of the management team, I found a profound motivation in developing others. The New Chemicals Program has been dramatically impaired by years of neglect. Our science team is full of passionate scientists that believe in the mission of the Agency. They need to be nourished and empowered so they can develop themselves and turn into great leaders. I have satisfaction in coaching people and guiding them through the journey. This would be a great legacy when I leave the Agency, as the mission will continue, and human health and the environment will be protected for future generations.
- 28.I do enjoy the work that I am doing. It is challenging and stimulating and allows for continual opportunities for learning. I also generally enjoy my colleagues and working with them.

29. Very little in the New Chemicals Division. Staff who are passionate, talented, and committed to carrying out the Agency's mission.

# 2. What is impeding your ability to get work done? (Process, people, systems, other)?

- 1. Managers at the BC level are extremely overloaded. In the current matrix system, managers are expected to manage up to 6 different highly specialized scientific disciplines (in the old EETD organization and most offices, BC manage 1-2 technical areas within their expertise). In addition to the administrative duties and personnel issues, it's extremely challenging to manage all the technical areas due to the lack of bandwidth. As a result, certain technical issues do not receive the amount of attention they deserve. The division is also lacking in senior scientists who have programmatic expertise and lacking in staff.
- 2. Not even remotely enough people to do the work. (And we take the heat for it.) EXCESSIVE requirements to report what we are doing and when and how that takes huge amounts of time away from us being able to do the work. There is also the continuation of the previous administration policies that don't pursue our mission to protect the environment and human health. Current upper management is not reversing course back to our mission.
- 3. Some of the offices in OCSPP do not like change and are incredibly resistant to it. This is incredibly frustrating when change is needed to improve the efficiencies of our work.
- Systems: CBI has been down for a few days, and also fails quite often. Our process has
  recently been altered to incorporate NCR updates. This is a difficult question to answer
  while we make this transition.
- 5. We don't have enough staff to do all of the work thoroughly and efficiently. Particularly in RAB. We have a handful of human health assessors responsible for all of the new chemicals cases, which means each one might have over a hundred cases they need to keep track of at a given time. That's too much work and quality can suffer as a result. Other disciplines are also overburdened, but human health is the most complicated and the issue is largest there. Frequently, cases have to be delayed in the review process because human health hazard reports or risk assessments have not been finalized.

Management review is also a major problem. Beyond the scientific ethical issues that come from 2-3 managers being capable of overruling staff and having the final say on all of the risk assessments, the limited number of management reviewers has turned it into a major bottleneck in the review process. This is the biggest impediment to completing new chemical reviews. Many cases are languishing because they have been waiting months (close to a year in some cases) for a management-reviewed health

report. These cases are under initial review and aren't even ones that required a new health report. This is the single biggest impediment to completing chemical reviews.

6.	The hostile and dysfunctional environment  (b) (6), (b) (7)(A), (b) (7)(B), (b) (7)(C)  We no lon	(b) (6), (b) (7)(A), (b) (7)(B), (b) (7)(C)
	(b) (6), (b) (7)(A), (b) (7)(B), (b) (7)(C) We no long	ger feel safe to have scientific deliberations.
	We are paranoid and distrustful of each other	<b>5</b> , 5
	because we are acutely aware that our mee	tings are more than likely being recorded
	without our knowledge and consent.	(b) (6), (b) (7)(A), (b) (7)(C)

- 7. The process and timeline for new chemical registration make it extremely difficult to provide high-quality and confident assessment outputs. Given the limited resources and people's time, there was minimal training for new staff to get acclimated to the process.
- 8. My manager (b) (6) . I have been repeatedly bullied by (b) (6) are also being trained to remove hazards from reports, manipulate calculations, and support bad science. This is extremely distressing to me, and I have a work-related disability due to this hostile work environment. The EPA has done very little to hold these managers accountable and misused taxpayer dollars to pay for expensive "executive training", thus the problems continue to persist and create systemic dysfunction. Furthermore, the entire work climate, NCD structure, and TSCA itself benefit industry and use taxpayers' dollars to fund it, and a huge impediment to getting my work done properly.
- 9. Some processes are outdated and there is resistance to change among some team members who have been in the program for many years. There is also a need for better communication between risk assessment and risk management functions.
- 10. EPA hiring process- when it takes months to onboard new staff and existing staff are overloaded with an unsustainable workload.

Knowledge transfer - when new staff, especially those new to the subject matter, do not have the background, training, or information access to be successful in their jobs.

People - when managers are SMEs but not prepared to manage people.

Political interference - when EPA changes direction or flip flops on cases without staff or program-manager level input.

- 11. Belligerent staff seem to go undisciplined by management despite continuously violating all norms of acceptable workplace behavior. Any one staff member at any time seems to have the ability to object, regardless of scientific validity, and stop all work with no apparent way of resolving the conflict.
- 12. Managers who put political or cost to the industry before the science is making decisions on policy and application of policy. Managers who don't understand the science and are not willing to listen to the technical experts. Managers from the Branch Chief level up to the AA level force technical experts to do unethical or illegal things and block scientific information from being released if it says something they don't like.
- 13. Not enough risk assessors to get cases done and excessive workload. Bad upper management undermines, humiliates, and de-incentivizes staff, People leave due to the bad upper management, feeling happy that they no longer have to deal with terrible management and then convincing others to leave. Also, can we review the Kodak case that leads to the need for CBI LAN? It seems weird that pesticides, which have more reason to keep their CBI secured don't need a separate LAN. The number of fire drills has gone down drastically since the new administration but that was a big issue. Also, the reiterative do loops with submitters. I know we are doing risk-based assessments but is there a way, we can just order them to limit their water or air releases instead of constantly receiving new information until the MOE has just barely been cleared and then just doing a water trigger, which we would have done in the first place. I wish there were a, if you can't meet this, then we either issue a unilateral order that you can't make it and if you can meet it, sign the order, and send us some monitoring after 3 years, showing that you are abiding by the terms of the order.
- 14. We are a very small team, and it is difficult to balance the workload with the number of people that we have. The reorganization impacted my discipline.
- 15. All of the above. Processes are not well documented, training is inadequate, there is insufficient staff to have proper separation of functions, and delays tend to ripple through the system. Every case feels like a "hot potato" where you just try to get it off your plate as soon as possible so you're not holding the ball when the timer buzzes.

There are people in the program who actively stand in the way of making improvements. These people create chaos, refuse to make decisions, change their minds frequently, or see any sort of discussion as a threat to their position of authority or knowledge of the subject matter. We need more collaboration and communication in a spirit of teamwork, not recriminations and pressure to hurry up. No one is an expert in everything and even experts can make mistakes; there needs to be more humility and open-mindedness. We need managers that are supportive of their staff.

One item that stands out is that more detailed discussions would be a good use of time if the earlier process piece weren't so broken. If it takes a little longer to reach a decision but then it's incorporated into the protocols/operating procedures, you save time down the road instead of constantly relitigating the science. We don't do a great job of documenting, so the same issues keep coming back and blowing up in the team, which chips away at the legitimacy of the process and inflames interpersonal conflict. The systems are set up to reward speed over accuracy, and deference to authority rather than deference to the facts. The Toxic Substances Control Act specifies the length of the review period and managers and staff who want to demonstrate "outstanding" levels of performance do everything they can to meet those deadlines, even when they have to undermine their colleagues to do so. In addition, the hierarchical structure of EPA and constant "rank-pulling" by senior leaders means that arguments aren't being judged based on the merits but the identity of the speaker.

- 16. Changing scopes, deadlines, processes, systems, and policies; vague directions/requests from the management; and limited resources impede my ability to get work done.
- 17. Process: The New Chemicals (NC) program is focused on getting the cases done within 90 days. It's just a factory-line assembly process and not focused on good science and not protecting human health and the environment. EPA also needs to engage more with the companies on the work regarding the different types of chemical classes. It would be great to collaborate with companies/trade associations on a joint project that results in a product. NC Program Managers should be able to have conference calls or meetings with companies for pre-notices and carry out the Pre notice Program the way it was designed to be implemented under the Lautenberg Act and not submit SOPs to a company's request for a meeting/conference call with EPA per (b) (6)

People: The managers are combative, retaliatory, mean, and do not follow scientific integrity. They just want to control employees and retaliate against employees who offer differing technical viewpoints on work. The human health assessors are stressed, have made complaints about me, and have given me the third-degree over non-issues. The human health assessor intentionally stays silent in conference calls with companies, and I have had to ask the human health assessor to answer the company's question since they were intentionally staying silent out of fear of retaliation (b) (6)

(b) (6) have contributed to a lot of problems and the NC Program would improve if (b) (6) . (b) (6) .

Systems: There are multiple computer systems for tracking and it's too much. We don't need reports all the time just to make sure it's under 90 days. We need to update EFAST.

- 18. Meetings and fire drills. My job, as I see it, is to distill multidisciplinary thoughts into readable, defensible, protective regulations. I'm a rule writer and a reviewer of others' work. Doing my job well requires large blocks of time, 2-3 hours, to write, rewrite, delete, research, rethink, stare blankly at the wall, and finally (hopefully) figure out how to pull something together--followed by a mad dash to get it all down before the idea disappears. 15 or 30 minutes between meetings is a waste of time to do anything of substance. It takes a good 15 minutes to figure out where I left off. Yet, from 9 am to 5 pm, I am faced with a wall of meetings--except for Friday. But I can't push all my actual work off until Friday. A person only has a few good hours of real work in them each day, hours which are best contiguous, with the rest padded out with administrative work. EPA, however, doesn't operate like this. And I am not naïve to think that other public or private organizations are much better. Yet, if I and others are to feel proud about our work, we need space to work rather than being jettisoned into a daily barrage of quick turnarounds and meetings with no clear point. I "go" to work each day fully expecting to play a grownup version of "Red Light, Green Light" and often crash in the evening, frazzled from being on overdrive for 9 or 10 hours.
- 19. Managers intimidating staff to change the science (b) (6) to favor industry, it delays everything.
- 20. I say that it is people in NCD and OPPT.
- 21. Too many meetings to check in about the progress of work. (Not necessarily happening right now but has happened in past.)

  Technical difficulties while working remotely.
- 22. All of the above for the risk assessment side of the program.... especially since the passage of the 2016 Lautenberg amendments which have put new pressures on the PMN program. Here are some specific examples:
  - PROCESS in my opinion, the PMN process is hampered by the CBI system (see below) and adherence to a siloed system of analysis. For the latter, each technical discipline operates on its own to develop a part of a risk assessment and there is no ownership of the total package.
  - PEOPLE we are woefully understaffed given the 2016 mandate. Lautenberg requires us to make a risk assessment finding for all cases (400-500 a year) whereas before 2016 we would only need to do so for ~20% of the cases received. Also, the reorganization in October of 2020 removed people from the PMN program (many very experienced). Finally, due to workload and other issues, people are leaving the program for other opportunities, and we have not been able to attract good candidates to come to our group.
  - SYSTEMS we use a separate LAN not connected to the internet for all of our PMN work. This is called the CBI LAN. It has its own email system (an outdated

- Outlook doesn't have Teams), there is no SharePoint, and the databases and infrastructure are antiquated because this IT system does not fall under the purview of the EPA IT system (it is all managed internally to OCSPP). And since the reorganization, CBI duties are split between an OPPT division (PMOD) and a new office (OPS). The CBI LAN needs to be updated or removed.
- OTHER our CBI restrictions don't allow us to collaborate easily with colleagues in EPA or anywhere else. We are not allowed to have graduate students or postdocs work with us to do key foundational work to help our program. This also needs to be corrected.
- 23. On a process note, we are crippled with a lack of SOPs and sheer terror at the thought of being less-than-perfect. We have let our sense of perfectionism destroy any forward progress we desire to make. We seem to think in such dramatic terms. It's almost like a novel: "we can't write SOPs because we might forget a reference that the American Chemistry Council might have wanted to be included and if they ask for us to include a reference that we didn't at the start then the whole thing has to be thrown out and we have to perform a sacrifice to redeem ourselves in the eyes of some unknown god." The drama of it is absurd. I've never met a group of people more afraid of getting in trouble in my entire life. We let perfect be the enemy of good until we have nothing written down, no policies, no processes, no directions, no onboarding documents, nothing. Why can't we just have SOPs and policies that we know are living documents and might need to be expanded or reduced over time? Why do we have to live in constant fear of imperfection?
- 24. People, process, and pending litigation.
- 25. The process of completing the risk assessment as well as difficulties with our main database.
- 26. What we lack here in NCD are standard processes and motivated individuals to complete assessments. We are very much in a reactive state when it comes to assessments. I would like for us to be proactive and build out standard operating procedures. I believe that management should provide all of the necessary tools (e.g., SOPs, best practices, etc.) and training so that the assessors are set up for success. We also need buy-in from the team so that the team is aware and properly utilizes all of the provided tools.

We also need to rebuild trust within NCD. Trust has been broken and seriously impedes our ability to finalize human health assessments to meet statutory deadlines. Trust issues have led to communication issues where individuals lash out at others- we need effective and respectful communication.

Motivation has been lacking. Some individuals do not pull their weight and that negatively affects others. In addition, when individuals act inappropriately towards others, there should be consequences. Managers and others should protect victims from continued harassment.

(b) (6)

The problem is that (b) (6) doesn't have actual expertise in risk assessment, doesn't understand the science, and cannot lead effectively. This is demonstrated by how (b) (6) reacts to the science information shared with (b) (6) treats the science managers particularly in public meetings with other managers or in private. (b) (6) consistently shows a lack of knowledge about basic concepts, has made edits to presentations that do not technically make sense and are uncomfortable that the science managers engage in technical conversations with (b) (6) or above the organization. This is a big problem especially when we have a high-paced environment, and (b) (f) frequently overreacts because (f) (f) doesn't understand the science work and comes up with unrealistic expectations when we still have severe staffing issues.

Lack of trust in the science managers and their staff. It is understood that the organization is frustrated by the lack of meeting statutory deadlines for new chemicals. However, we are where we are because the program was neglected for many years. Most resources went to the Existing Chemicals program when the statute was amended in 2016. The New Chemical program was self-managed by the scientists because the managers in the former Risk Assessment Division were primarily focusing on the first ten risk evaluations and the systematic review framework. So, the money, the budget, the staffing went to the Existing Chemicals program, and the New Chemicals program was not resourced appropriately. The current science managers have significant institutional knowledge both technically and organizationally. However, (b) (6) has indicated that some science managers have hidden delays from and do not communicate frequently on the science work. (b) (6) has also sought division between the risk assessment and risk management branches by regularly saying that the risk management team, but not the science team, informs her regularly on the work. That is not factual due to the many meetings that we have with members of the NCD Immediate Office where we communicate what the science team does and its challenges. The (b) (6) has requested these meetings since the inception of the division, and the science team has been regularly meeting with the (b) (6) to inform about the status of work, prioritization of cases, staffing/recruitment, infrastructure work, etc. Also, there is a pattern that has been created in the last 6 months where some

science managers are excluded from email communications. This is very concerning and, if not addressed, may turn into perceptions of discriminatory practices that are not explained by just division of labor and delegation of work from the (b) (6) to a It is well known that the lack of trust hurts the (b) (6) productivity and innovation of the organization as people don't feel safe. It is important to feel valued, be part of a group and know that your boss has your back. If you don't' have that, people look for other jobs. We quite frankly do not have enough team members to process the volume of work that is required of us. Further, our work is scientifically complicated and requires time for in-depth thought and research for which we do not have enough time to do due to the previously mentioned lack of sufficient team members. We also need to be reading and learning so that we can correctly apply scientific principles and risk assessment methodologies and there is zero time for that because we are too busy just trying to keep up with the workload because we don't have sufficient staffing. Contributing to this is also the number of meetings that we often find ourselves in. Lastly, for any team to work effectively, we have to be able to trust and rely on our colleagues. Currently, there are some issues with this at the staff level. There seems to be some hostility and disruptive behavior from some staff members towards others and it has created an unhealthy situation that is affecting morale.

- 28. Management that micromanages and interferes with staff risk assessments.

  Assessments were put through multiple rounds of review with the sole purpose of eroding risk findings. The results in several cases were not supported by basic scientific principles.
- 29. The focus on the number of completed cases, as opposed to the quality of the work or being protective, is also a major impediment. The "surge" goals under the previous administration were heavily demoralizing and counterproductive. Even now, there seems to be an idea of adding busy work to RMB to improve the perception of our work output. Things are busy enough already.
- 3. What are the most critical things that need to be addressed to improve your organization? NOTE: Please indicate if your suggestion relates to a specific level or generically to OCSPP
  - Lack of trust in the human health team at the staff level. When issues are identified, some staff tend to perceive the situation as a scientific integrity violation rather than a simple mistake, without giving others the benefit of a doubt. General lack of resources at both staff level and branch level. Staff does not have the bandwidth to improve the science beyond the day-to-day casework.
  - 2. Branch level about 4 times as many people as we currently have. Return decision making to Division level and below. Office and Senior Leadership should be fighting for a return to our mission and support the staff over angry industry lobbyists.

- 3. SES leadership that embraces our AA's vision and promotes a kinder workplace.
- 4. No comment. I have only been in NCD since July.
- 5. Aside from what was mentioned in the previous response, it seems like the work atmosphere in RAB has become somewhat toxic. There needs to be more trust between the RAB staff and their management. It's also difficult to recruit and retain staff when the work environment is not fun.

It doesn't make sense for the management review of health reports to be done by the actual managers. Branch chiefs are busy with a lot of work and don't seem to have the time to do all of the management reviews they need to do. There are also bad power dynamics when it comes to differing scientific opinions since they often have power over the staff they are disagreeing with. Ideally, there should be more people capable of doing the second line "management" review and they should be out of the chain of command of the staff health assessors. There should be some mechanism for handling DSOs beyond the current system of "what management says, goes.

At the OCSPP level, the most important thing is for upper management to realize that adherence to the statutory deadlines is virtually impossible without sacrificing quality or greatly expanding the workforce. It's also virtually meaningless because chemical companies are happy to provide suspensions and there's no reason to try to force the end of a case when the company isn't applying pressure. I think they should care less about the deadlines and allow us to focus on the actual mission, which is protecting human health and the environment and not simply completing as many chemical reviews as possible. Beyond providing more resources to do the work, it would be helpful if they could lobby Congress to just get rid of that arbitrary deadline.

6. It is critical that management and senior leadership come to terms with the reality that they have a responsibility and duty to the rest of us to provide a safe working environment.

(b) (6), (b) (7)(A), (b) (7)(C)

environment. (b) (6), (b) (7)(A), (b) (7)(C) (b) (6), (b) (7)(A), (b) (7)(C)

7. Branch and Division level managers should provide more support for training new staff to learn about the risk assessment and management process in NCD. Supervisors were too busy doing so many other activities like risk assessment reviews, meeting with stakeholders, etc. that they didn't have enough time for staff support.

- 8. All of the above Branch Level, Division Level, Office Level, Senior Leadership Level (AA/DAA). There is a systemic problem. I think holding the perpetrators responsible for committing these scientific integrity violations and fraud will help improve the organization.
- 9. Improve communication between risk assessment and risk management functions (between risk assessment branches and risk management branches). Create openness to change, where processes are outdated.

### 10. Branch and Division level:

- There needs to be actual repercussions when individuals create a toxic work environment, and more tools to equip staff to call out unacceptable workplace behavior.
- More transparency is needed between management and staff on agency decisions (relating to chemicals management AND staff/organizational management).
- 11. Developing a process of resolving disagreements in a timely fashion (Branch/Division). Working with the union to develop a process where staff is not subjected to continued harassment by one employee after numerous complaints have been raised. Whistleblower protection cannot allow an employee to email disturbing images to staff, call/text their personal phone numbers at all hours of the day and force the staff to continue working in a hostile environment (AA/DAA).

Background investigations need to be conducted before bringing employees into a highpressure environment (Division level).

The staff should be part of the hiring/interview process since it is the staff that will be working most closely with new employees.

Due to the paucity of data, many short deadlines, and a high volume of work, new chemicals is a far more difficult job than many other places in the agency. The NCD human health toxicologists need to be primarily GS-14 level positions with GS-13 and GS-12 apprenticeships. This was the way the program ran for many years and has recently been jettisoned due to staffing shortages. This is justified by the fact that the current risk assessments require not just a comprehensive understanding of toxicology, but also deep knowledge of the other disciplines as well to draft a cohesive document (AA/DAA/Office Level/Division Level).

Apprenticeships should serve on a trial basis for 6 months at which time a mutual decision should be made as to whether the new employee is a good fit with the team (all levels).

12. Certain Branch Chiefs and higher-level managers need to be removed.

A first-line manager who continually receives grievances and complaints should be closely evaluated. In at least one case you will find that several world-class experts have left OPPT to avoid being required to follow unlawful directions or face disciplinary actions. If a manager has been identified by the EPA unions as having revived more complaints and grievances than any other in the Agency should not be promoted.

Branch Chiefs and higher-level managers should not be allowed to use their authority to block science they do not like. The number one change I would suggest is to allow staff to release or publish without technical information without having a required step where managers can censure it.

OPPT pays only lip service to scientific integrity. There is no negative effect for a manager at the Branch Chief or ADD or DD level violating the Agency or White House scientific integrity policy. On the contrary mid and higher-level management actively violate it and are rewarded for doing so.

It is clear to staff that they will never see a manager removed or disciplined for anything. The staff knows that their only recourse, when confronted with unethical or illegal actions by management, is to leave.

- 13. Office Level! Please for the love of God, get a good permanent office director. Someone who is technically knowledgeable but also values a cohesive and supportive work environment, even if that means from another agency. This whole beat them until morale improves ideology is not working.
- 14. We need to address the scientific integrity issues head-on at all levels because it has created distrust between employees. Those who provided the information to the public for the articles would record meetings, etc. and we were not aware of that. While I was not directly impacted, I know that other employees don't feel protected. It is a giant elephant in the room that hasn't been addressed by upper management and it needs to be addressed because everyone is indirectly aware of what has been going on.

5. <mark>(b) (6)</mark>	

	the branch level - lack of trust and understanding between managers and staff; at the division level - vague and ineffective directions cause everyone to operate in a reactive (not proactive) manner; at the office level - insufficient resources, unrealistic requests, and fear of how office managers will react to staff recommendations; and at the senior leadership level - lack of strong representation and support when interacting with external stakeholders.
17	
17	(b) (6)  EPA should offer NC webinars to the public as a form of training so submitters can submit improved submissions and we don't have to do a Q&A session since the companies right now are so angry with EPA. Over time after improving relations with the companies, we include a Q&A in the future.
	It's also important to incorporate the knowledge and experience of the staff scientists and Program Managers (risk management) into the cases and they should not feel intimidated or scared to speak out of fear of retaliatory comments and behavior or fear of being yelled at or fear of being publicly outsmarted/argued against. I see this all the time with all risk assessors and with me (b) (6) and this has to stop. The risk assessors won't even speak in conference calls or meetings with companies since they are too afraid and I'm tired of it.
	Stop being so focused on getting cases done in 90 days and the bean-counting. Focus on getting high-quality results and high-quality deliverables. (b) (6) should stop reviewing and re-editing the human health reports. The human health reports do not need to be reviewed and re-edited at the These are just staff documents so why is (b) (6) reviewing and editing the work? It should only go to the Branch Chief level, but (b) (6) is not technically competent, and I cannot trust (b) (6) work or judgment. Management needs to trust staff's work and not micromanage.
	Another problem is that (b) (6) thinks that some employees are more valuable than others and therefore the valuable employees get treated better and fairly while the non-valued employees are not treated fairly and treated like garbage. For example, (b) (6)
	(b) (b)

16. The following issues need to be addressed to improve the New Chemicals Division: at

- 18. Days or blocks of times without meetings. Zero exception. If you allow an exception, people will find ways to back into the exception--we're a regulatory agency, this should be clear.
- 19. New managers need to be brought in for OPPT without ties to the industry.

20.(b) (6)

They are the same people involved in the whole process from the beginning to the end process.

21. Sometimes there's a disconnect between expectations and the reality of when/ how long it takes to finish deliverables. Would help to have experienced staff in leadership like (b) (6) is experienced, extremely knowledgeable, a great communicator, and a wise leader. (6) knowledge of both the science and the statute goes unmatched. (6) should be promoted to division leadership or at least work in the IO of New Chemicals.

There should also be transparency about the QA/QC process of reports through RAB management.

I'd also like to improve communication between RAB and RMB. There is still a hesitancy to contact RAB with questions from RMB because of prior protocol and I wish we could feel more comfortable engaging assessors in dialogue.

- 22. I provided specifics above....and below I suggest the appropriate organizational level:
  - PROCESS New Chemicals Division (notably three branches RAB1, RAB2, and ICB)
  - PEOPLE NCD IO and above
  - SYSTEMS I believe this is an OPPT IO issue (working with OPS and PMOD and NCD and DGAD)
  - OTHER updated/reviewing the need for strict CBI LAN stuff same as systems but also with OGC
- 23. In OPPT, at every level (Branches through Office), a sincere look needs to be taken by our AA to decide if the desire is to preserve the current supervisors, in which case they need formal supervisory training, or if they need to be replaced. There have been a lot of turnovers and a lot of folks filling into temporary roles to support OPPT, and the attitude seems to be a strong willingness to burn out managers and staff with incompetent leadership instead of investing in training and development. Not everyone who is a good scientist will be a good supervisor, and soliciting feedback from staff,

acting on that feedback (which will be an important step in rebuilding good faith with the office, as staff feedback is ignored to the point of hilarity), providing resources, providing replacements, all of that would be a kindness at this point. Why leave an office to drown and then punish them for drowning?

- 24. The organization needs to hire the resources it needs to get the work done.
- 25. Communication between all levels on reasons behind decisions and making sure decisions continue to get made in a reasonable amount of time.
- 26. Trust within the team as well as branch Level.

Standard and management-approved procedures to protect the team from allegations of scientific integrity. When we have a standard process/best practices, many times we can rely on the process instead of professional judgment."

27. We have to build trust in the (b) (6) and between the science and risk management branches. If the managers have trust issues, how can we ask the rest of the division to exhibit and promote certain values? This includes making people visible in the organization. This is not necessarily presenting briefings to upper management. It is about making people feel welcome, valued, included, not putting them in a corner because of allegations that have been surfaced in the press. This includes accepting diversity of viewpoints, communication styles, and cultural differences in an environment that is respectful without manipulative behaviors that undermine the confidence of your management team and staff.

The science branches need more people to do the work, including technical GS-14 scientists and organizing the scientists by expertise. Adding a third branch would be helpful: one for exposure/engineering work; another one for eco/fate, and another one for human health hazard/biotech.

First-line supervisors work in a stressful environment every day. Some of them feel that their superiors don't have their backs since they exclude them from the important discourse that affects the daily management of their units. On one hand, it has been communicated that the first-line supervisors are accountable for their operations, but other times, their autonomy is highly controlled by the (b) (6). It is difficult to know what we can or cannot do.

(b) (6)

NCD Branch
Chiefs can also help with the training, but they are overextended with the multiple

First-line supervisors and team leaders need to spend less time in meetings. The same applies to the staff. There are too many meetings related to the new chemicals review process. The LEAN workflow should be reopened to simplify the meeting schedule.

NCD organized a retreat in January 2021 and there were various presentations about improvements to the risk assessment and risk management work. The retreat was recorded, and the files are available to the third-party group for review. The presentations were mainly done by knowledgeable staff in the program that understands working in the trenches.

Rework of human health risk assessments has caused a backlog of cases. We have to control the rework. However, we still see an influx of requests to rework cases and companies are elevating matters to the political level.

- 28. Staffing levels for our team are by far the most critical issue, followed by the number of meetings that we are attending. Make sure that any hostile and disruptive behavior is not tolerated.
- 29. Retaliation, intimidation, lack of transparency, improper alterations of assessments without staff knowledge.
- 4. What would be the most helpful actions that could be taken to improve the New Chemicals Division? NOTE: Please indicate if your suggestion relates to a specific level or generically to OCSPP.
  - 1. Re-organizing the risk assessment branches into exposure-focused v. hazard-focused branches, rather than 2 parallel branches with identical functions.
  - 2. LOTS more staff to do the work. Commitment to staff career development.
  - (b) (6)

    , who have a lot of these same issues. This creates an incredibly toxic work environment.
  - 4. No comment. I have only been in NCD since July.
  - 5. Hire more RAB staff. Improve the management review process.
  - 6. That management and senior leadership stop allowing the rest of us to be bullied. Hold accountable for [6] countless examples of unprofessional conduct.

- 7. Managers could pair new staff with seasoned staff or alum to make sure historical knowledge is retained and shared. Supervisors should provide more support through regular check-in meetings and introduction to relevant members of various disciplines in NCD. There were way too many meetings and not enough time for staff to interact with each other informally so that we could learn from each other. Major restructuring so that meetings could be minimized will help improve the process.
- 8. are the worse perpetrators of these scientific integrity violations and fraud.

  (b) (6) have been complicit in these crimes against humanity.

  (b) (6) also committed these crimes but left the Agency. Hire competent Ph.D. toxicologists to rebuild the program. The new hires are being wrongfully trained and need to be retrained or also fired if they continue these fraudulent acts.
- 9. Improve communication between risk assessment and risk management functions (between risk assessment branches and risk management branches).
  - Create openness to change, where processes are outdated.
- 10. Generically to OCSPP: more emphasis on developing/maintaining scientific expertise for new staff and developing Allow staff appropriate time to work on cases and reserve time for professional development to improve overall office efficiency.
- 11. See answers in number 3.
- 12. Replace managers who do not know the science and the policies with ethical people who understand the technical and policy aspects of the New Chemical Program. Any manager who has not done New Chemical assessments should be replaced. Any Branch Chief who regularly loses technical staff should be removed. The ongoing loss of technical expertise needs to be stopped if the program is to function at a high scientific level. This will only happen when abusive, unethical, ignorant managers are replaced.
- 13. Mean managers need to be gone, specifically (b) (6) needs to go. (b) (6) actions during the last administration were underhanded. One of the most egregious examples was when (b) (c) championed the removal of PPE restrictions, tried to pretend that (b) (c) was just following orders, and then when pushed finally stated "we all know all of these risk assessments aren't good anyway". (c) (c) had been the (c) (d) (d) just a month prior! It was insane and a terrible way to show that (c) (d) would throw us all under the bus. Also, in general, (c) (c) is not a great manager. (c) (d) was the main driver of the (b) (6) management system and promoted supervisors that were less knowledgeable but harsher and got rid of branch chiefs that tried to protect the work-life balance and were more knowledgeable.

to understand and correct for weaknesses. has a habit of making most of the people working under befreel miserable.

Promote (b) (6) knowledgeable, practical, and cares about staff but is never given to due because (b) (6) quiet. ICB needs a mechanism to promote crucial scientists who are not on the management track. We keep losing all of our good chemists to other programs or industry.

- 14. We need to focus on retaining and hiring employees at the branch level.
- 15. We need an investigation of alleged violations of the scientific integrity policy and corrective actions to be taken. These corrective actions should include accountability for those who violated the policy and a revisitation of any decisions or Agency actions that may have been taken incorrectly.

At all levels, we need bullying and intimidation to stop and to foster a workplace with cooperation and trust.

16. The following actions could improve the New Chemicals Division: at the branch level - culture change where staff members' differences in scientific opinions are valued and respected and workload is realistic; at the division level - increased transparency about challenges and changing policies; and at the office + senior leadership levels - meaningful listening sessions with follow-up check-ins about the process.

17. (b) (6)

18. Fewer meetings. Clearer meetings. Focused shorter meetings, grouped in time blocks. Understanding of who has to be at a meeting. I don't like to multitask--multitasking is something that isn't all that possible, at least for anything beyond rotary tasks--and shouldn't be expected to be reviewing/drafting something while also paying attention to or contributing to a meeting. Also, an acknowledgment that everything can't be a priority. Having more than one priority, priority is a modern linguistic phenomenon. The word "priority" remained singular for the first five hundred years of its use in English. Only in the 1900s did we pluralize the term and start talking about priorities. Only one thing can be the most important. For something to move up, something must slide back. Let's stop pretending that we can bend space, time, logic, and the English language to meet unreasonable demands.

19.<mark>(b) (6)</mark>

20. Agency should remove the list of these corruptive people from the current position including (b) (6) and bring the new people who allow the employee to have

- safe working environments in NCD and OPPT and are willing to bring back the mission goals that our administrator, Michael Regan announced on April 9, 2021.
- 21. Promoting the more experienced, knowledgeable employees to help within division leadership like (b) (6). I would like more communication on how to best contact RAB from RMB. More team building with the whole division would be helpful.
- 22. PROCESS we are working within NCD to help fix the risk assessment process (HH QA/QC, develop a new process for our risk assessment process, and other activities identified in our January 2021 retreat).
  - PEOPLE we need more people...primarily in human health toxicology and risk assessment. But we also need more folks in other disciplines (i.e., environmental fate and engineering) and some general scientists (what used to be called integrators).
  - SYSTEMS/OTHER- assuming we have to keep using the CBI LAN, update it and ensure that external experts/graduate students can help us with advice, expertise, and work.
- 23. I want you to understand how passionately I hate this question. This question is asked frequently, which is how I know staff feedback is ignored to the point of hilarity. The answer remains the same every time: hire more human health assessors for New Chemicals Risk Assessment Branches. And not "oh we put out a call for a GS-9 and then four months later we did three-hour interviews with two people who were marine biologists and neither of them wanted to join us, how could this have happened?" Make a good-faith effort. Put out for non-supervisory GS-14s. Scientists who spent 6 years getting PhDs to be subject matter experts in an area we have decimated deserve to get paid appropriately to do hard work. Also, you know that managers in these areas are highly criticized (for valid reasons) so in addition to hiring and appropriately paying competent people, shaking up the managers with either training (absolutely bonkers that you can't just take a Ph.D. scientist who has never managed anyone, give them 15 employees, and assume they are conflict resolution experts; it would be nice if that's how it works, but it doesn't, and frankly it's cruel to assume it does) or bringing in new people who have experience. Beyond this, the above point of allowing staff to speak would also be a bonus, but I'll settle for, getting human health assessors.
- 24. The program is broken. Hire the resources needed to get the work done. I am now embarrassed to be a part of this organization and feel my professional integrity is at stake. I am front-line to submitters and tired of telling them to resubmit their PMNs because we can't bring the work to completion. I hope someone looks at the cases that were withdrawn and resubmitted.

25. Have a way to solve disputes outside of the direct management chain and with knowledgeable scientists leading it instead of managers.

# 26. Generically:

- Training on effective and respectful communication.
- Developing SOPs/best practices, etc.
- Provide training
- Update models and upgrade CBI LAN
- Team building opportunities where the team is incentivized to participate (e.g., during work hours, food/drinks/entertainment are provided, etc.).
- 27. Rulemaking specifying a minimum data set for the risk assessments would be helpful.

Documentation of science and risk management policies with internal and external stakeholders. We need to be more transparent with the public. If we are developing a new scientific approach, we could send it to the TSCA FACA committee for peer review.

We need to balance the workload of managers and staff, so they start achieving a work-life balance. We can't do it all now as we don't have enough people. Even if we have money to send to the contractors, you still need people in the division to evaluate/check the contractual deliverables. There are inherently governmental functions that can't be given to our contractors. There are limits to what we can accomplish in-house based on current staffing levels. NCD/OPPT/OCSPP leadership should support opportunities to scale down our work during this difficult period. People are stressed out, particularly in the human health team. As we gain more staff, we can gradually do other projects. The first line supervisor and staff are overwhelmed, and we need some relief. Otherwise, we will see another wave of people leaving the division. The high level of stress is affecting our well-being and is sickening people.

- 28. Increase staffing, reduce meetings.
- 29. Managers need to be held accountable for their retaliation against staff who have been working to support the Agency's mission. Staff should be rewarded for making safety findings rather than just for greenlighting the greatest number of chemicals.

# 5. What is your greatest hope going forward?

1. I hope that the division can be re-organized to allow managers to better focus on areas within or close to their technical expertise, that the division can be provided more resources (FTE), and that trust/interpersonal relationships can be re-built such that people understand that most of us are trying to do the right thing.

2. (b) (6)

- 3. (b) (6)
- 4. That we continue to improve our process and don't settle for adequate completion of tasks. I live for efficiency, and I hope the division, branch, and team are always amenable to changes that may improve our efficiency. I want my ideas to be heard.
- 5. That we hire more RAB staff. We could use at least two more RAB branches.
- 6. That I find a new job as soon as possible.
- 7. The work that NCD does is so important. But the pressure and high expectation have caused a lot of staff turnover. I hope that going forward we can strengthen NCD such that it's a place people want to come to rather than leave.
- 8. I hope that NCD will be rebuilt from the ground up, as originally intended by the 2016 TSCA reform, and enact new policies to enforce these reforms. If this is not feasible, it appears we will need a new law. Ask me to be a part of this transformation of NCD, how to implement this change, interview/hire/train new managers and scientists. I would also like to be publicly recognized for the work I and others have done to bring to light these ongoing scientific integrity violations and deception to the American people. If the New Chemicals Division is failing, the ECRAD will always be overwhelmed by an endless backlog of chemicals that need to undergo systematic review.
- 9. Communication will improve. Processes will improve.
- 10. That OPPT staff can function in a safe work environment free from harassment to become a high-performing organization and become subject matter experts in their fields to give EPA some credibility and regain public trust in our decisions. - from a former OPPT staff member
- 11. Concrete changes will be made to protect staff from working in a hostile environment.
- 12. To see OPPT as a place where people around the Agency want to join and come to work instead of a place to avoid or leave as soon as possible.
- 13. A New Chemicals program with good management, positive social interactions, established processes for scientific decisions, realistic expectations with industry, more interaction and training with NGOs and workers, so we can see how our regulations affect the people we're trying to protect, and of course good work-life balance. Also, the Categories Document is extraordinarily outdated. I think if that were updated, it would cut down on the scientific integrity issues.

- 14. That we can move forward from the scientific integrity issues and retain and hire more employees (to spread the workload).
- 15. I hope that we can emerge from this trying time stronger, with a better, healthier organization. I hope that we can identify our areas of weakness so they can be strengthened against future challenges to our scientific integrity. We will again have more tests of our organization and its commitment to the mission, there are powerful incentives to ignore science and make decisions based on politics or financial incentives instead. We need to have robust defenses in place to ensure we stay strong for decades to come.
- 16. My greatest hope going forward is that the New Chemicals Division can be a place where staff members and managers can pursue their professional and personal goals in a collaborative and positive environment.
- 17. That I can do my job in which I am exercising my educational background; work experiences, share my knowledge and experiences to companies and coworkers, have a management team that's warm, friendly, fair, can accurately assess things, apply professional judgment instead of personal bias, and that recognizes and appreciates my work while perceiving me as a valuable employee in the division.
- 18. That someone reads my responses and cares, rather than thinking I'm a whiny, smart-ass.

19. (b) (6)

That the PMN program will be based on science and not policy-based outcomes influenced by industry.

- 20. I want to have a safe working place without being bullied, discriminated against, feared, and disgraceful. At least I want to have a team environment in which the members could respect each other.
- 21.I hope the division morale can improve and we can work out the processes in question regarding scientific integrity.
- 22. That we "right the ship" as we move forward and gain internal and external trust in what we do.
- 23. We have the best staff; my greatest hope is that we can retain them. I hope that we change OPPT's culture to a point where people enjoy their work again and want to join us. I hope being detailed to OPPT is no longer viewed as a punishment but as a fun

learning experience. I hope that this year New Chemicals staff receive awards instead of being blacklisted for a backlog they neither created nor propagated. I hope we stop immediately caving to industry pressure on every single issue instead of trusting in our science and following the law. I hope that this not-anonymous survey does not result in retaliation against me.

- 24. To get out of the organization. Willing to take a lateral or move to a different agency to escape this broken organization.
- 25. That the program can continue making decisions with sound scientific reasoning that is shared among all staff and the public.
- 26. I hope for a better, proactive process for the team to conduct assessments to meet statutory deadlines.
- 27. The New Chemicals Division is encountering enormous challenges. All of us care about protecting human health and the environment. Nobody wants to approve a chemical that harms the public or the environment. I hope that the division, office, and AAship work together to overcome the negative perceptions about scientific integrity violations and wrongdoing allegations affecting public health. We have to respect each other and be able to be kind to one another. The current discourse has been unfair to many people who are highly committed to the mission of EPA and are being maligned by constant allegations that have been raised in the organization in a very disrespectful way. I also hope for increased collaboration with other parts of the Agency to transform the division and inject excitement into our scientists. They need to be intellectually stimulated and feel that they are part of the transformation.
- 28. I just want to have a collegial team where we can work together and accomplish our work and feel good and proud about the work we do and have sufficient staff so we can leave at the end of the day feeling like we still have the energy to have a fulfilled life outside of work rather than being completely drained and stressed.
- 29. That I no longer have to fear that management interference could result in a decision or assessment that I worked on/contributed to harming human health and the environment.

# OCSPP LOOKING FORWARD: A CLIMATE ASSESSMENT

LISTENING SESSION NOTES

# LISTENING SESSIONS

### 10/27/2021 and 11/2/2021

**Note:** The responses from the 4 listening sessions were combined under each question since they originated from group sessions.

# 1. What do you appreciate most about working in the New Chemicals Division?

- Excellent Branch Chief
- Many smart and highly skilled peers in the branch
- Innovative and creative staff who use technical skills to solve problems
- Great diverse team of dedicated and talented professionals
- The Risk Management Branch has an amazing staff and branch chief.
- Staff are friendly. There is a collaborative and fun atmosphere.
- Good alignment of work with the vision/mission of the Division
- Very exciting to see the newest chemicals on the market before they were released.
   Can see where the industry is going. Very much like being "in the know."
- Interesting work
- Short deadlines
- Everyone works hard.

# 2. What challenges are you facing in getting your work done?

- Biggest challenge is that there are not enough people to do the work required by the statute. We could get the work done more quickly if there were increased staffing.
- The final review process needs more people. There is too much work on top of all the other duties.
- In addition to the lack of people, the timelines of 30 days and 90 days are just too restrictive. We can't get work done effectively in this high-pressure situation.
- The timeline may have worked when this first started, but the number of cases has exploded. It is a challenge to get enough information so accurate work could be done.
- The most difficult part is the lack of data. It is very difficult to make quick decisions. There is no time to produce new policies or more data.
- Issues:
  - Lack of people
  - Lack of time
  - Lack of data
- More issues:
  - Complexity of science
  - New science
  - New applicants don't know how to submit applications
- Expectations are ever-changing without communication to the team. SOPs are not followed.

- Need time for training and accountability to follow SOPs.
- Sometimes different people in our division have different ideas about how things happen. If people are firm in what they believe is the appropriate course, it can be difficult to untangle the differences.
- In addition, there are teams and disciplines. If something is held up by a particular issue, it holds up the whole process.
- The biggest barrier is the bottleneck with risk assessments due to a shortage of staff and not enough management reviewers.
- The communication process between the Risk Management Branches and the Risk Assessment Branches is broken. Risk Management Branch staff are forbidden from contacting Human Health Assessors. They must raise the issue to their Branch Chief who will speak to the Risk Assessment Branch Chief who will talk to the Human Health toxicologist then the communication process is reversed.
- If there are difficult choices to be made different disciplines, different risk assessors, different risk managers we lose time trying to settle/resolve these differences. This adds more pressure to decision-making, especially given the timeline.
- Each assessor approaches the assessment differently. They don't codify approaches. Lots of back and forth with managers can provide an opportunity for managers to change the science.
- The timeline is being used to force decisions, especially when risk assessors don't have enough information. Risk assessors need to be able to say that they cannot decide because they don't have enough data. This needs to be an acceptable answer!
- Multiple teams look at chemicals from different scientific perspectives. Differences can sometimes be reconciled and sometimes not. There needs to be a better way to settle differences.
- Difficult to have peer discussion to resolve issues because there is not enough time.
- There are "off-ramps" to stop the clock when needed. Sometimes there is major pushback on using the "off-ramps." Non-scientists sometimes force the scientists to stay on the clock and not use the "off-ramps."
- The pre-notice program is not used sufficiently.
- One participant said they left the New Chemicals program because decisions no longer were made by experts.

# 3. How would you describe the culture of the New Chemicals Division?

- Many years ago, the culture in the New Chemicals program was amazing. They were a work-family where the staff was trained and treated well.
- New TSCA brought changes to how we work and imposed unrealistic goals.
- Today there are split cultures. The risk assessors are under more pressure than others in the NCD.
- On the risk management side, there is more staff, and the work is better to spread out. There is less pressure on the risk management side. The culture is good.

- In risk assessment there is a hostile culture. The staff has been told to leave the room when they expressed a scientific opinion which was contrary to management.
- Almost everyone who has disagreed with management has been reprimanded and received poor performance reviews.
- There is a lack of transparency. Cannot speak to PMs in the Risk Management Branches. They are also not allowed to talk to other experts outside of OPPT.
- Suggested changes to improve the division have been manipulated to make managers look good.
- Risk assessors are hostile.
- The culture has slightly improved on the surface. But it has become more covert and less overt.

# 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?

- Need a new management team.
- Need more staff. Need at least double the number of risk assessors.
- It would be great to develop policies on routine health concerns and policies. Staff is so overworked that they can't keep up with these.
- Must improve the workflow.
- Never any time to make sure that the science is up to date and accurate.
- There are many high-quality, intelligent people with great staff interactions. This comradery should be supported.
- Unique situation onboarded during the pandemic. Struggled because I did not get proper training, did not get background, and had no historical knowledge on how these cases were treated in the past. In the 9 months, I only met with my supervisor three times on significant issues.
- There is a lack of guidance, training, or framework to make sure that the new scientists are up to speed. A sink or swim mentality prevails.
- Recommend: Big Brother or Big Sister to share policies, written or unwritten, with new scientists. Everybody was too busy. What is needed is:
  - Guidance
  - Frameworks
  - Training
- Change the new QA/QC process which was supposed to improve the workload. It
  requires more time to finish a case. "It has evolved into another way for us to suffer."
- Managers just observe differences of opinions among disciplines without interceding and resolving the issues.
- Promoting non-qualified scientists.

# 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the Branch Level and the Division Level?

### Branch Level:

- In the Risk Assessment Branches, the process to address differing opinions goes through the supervisor.
- o If there were differing opinions, you had to go through a supervisor. There were allegations of retaliation from people in the same discipline.
- Not enough input to see if there is consistency across assessments.
- The recommendation is to establish senior advisors for science who look at the science issues. Separate science review from administrative review and from the manager who does your PARS. Get someone outside the chain of command to look at the science. No one assessor should finalize. It is an EPA decision.
- Assessors were put in a tough position. The person reviewing exerted intense pressure to change things. And if the scientist refused, there was retaliation against the staff in their PARS review.
- When communicating across organizations, employees were chastised.
- No consistency is assured across different cases.
- o There needs to be an additional review of decision points as they are finalized.
- Want more empowerment and respect for decisions.

### Division Level:

- Because of the fast pace, risk management decisions were made and not shared. Learned of the decisions in E&E News months later.
- Need to share general policy decisions with risk assessors.
- "Moving forward, here is the policy..." Would like to get them in a line item in divisional emails.
- Policy decisions should be kept in one centralized location, TEAMs, or SharePoint, to keep people informed and up to date.
- Update policies in real-time.
- Don't delete old policies. Mark them superseded or no longer used.
- It would be helpful to have occasional all-hands.
- Hold the perpetrators of the hostile environment accountable and put them on administrative leave.
- Risk assessment management interferes with risk management work.
- Curtail interference from Risk Assessment Branches with submitters and allow risk management the opportunity to ask for more data.

# 6. What is the most important next step?

- Staffing, staffing!
- Hire more people
- Training
- Transfer of historical knowledge
- Appreciation of the workload. Better manage the workload because Lautenberg demands so much more rigor!

- Management needs to do something about managing the workload to mitigate the dayto-day stress. Anything to support folks with the workload would be appreciated.
- Better plan for hiring in the most impacted organizations.
- Highlight the accomplishments and decisions to remove chemicals from use or mitigate exposures rather than only the number of chemicals approved. Measure impact, not beans!
- Sincere acknowledgment that there is an issue of waste, fraud, and abuse. Hold transgressors accountable and communicate the actions taken.
- Appreciate listening sessions but need to recognize those in the risk assessment arena have been through the wringer resulting in no trust.
- Stop the retaliation.
- Something needs to come out of the Climate Assessment. It is demoralizing when nothing happens.

# OCSPP LOOKING FORWARD: A CLIMATE ASSESSMENT **INTERVIEW NOTES**

# INDIVIDUAL INTERVIEWS

### 11/02/2021 and 11/12/2021

# **INTERVIEW #1**

# 1. What do you appreciate most about working in the New Chemicals Division?

- Interacting with colleagues
- Using my scientific skills, my experience, and technical knowledge so the companies can benefit and provide a value-added submission
- Enjoy getting to know submitters
- Opportunity to be creative as a Risk Assessor and as a Risk Manager. Worked in both areas.
- Enjoy working with new chemicals and enhancing my technical skills.
- Before the Lautenberg Act was enacted, people were very helpful.
- After Lautenberg, the Risk Assessors were stressed out and mean.
- Lautenberg didn't change the way we did things.
- New managers came to help with the implementation of the Lautenberg Act.
- There was pressure to get things done in 90 days and look for creative ways to address the backlog. It caused stress.
- The Branch Chief and Division Director were new.
  (b) (6)

# 2. What challenges are you facing in getting your work done?

- Reworking of reports.
- Human Health Assessment reports took a long time to be drafted and finalized.
- The new (b) (6) don't understand the process. The
  assessments are not deep dives or research projects. They are at the screening
  level.
- (b) (6) (b) (6)
- When I made a negative outcome from the Human Health technical data and reports, I was bullied. Companies demanded meetings with the AA and above. Learned from another that after a meeting with the (b) (6)
   the outcome was changed to no risk.
- Hair on Fire Requests. How do we give the companies what they needed so there
  would be no likely finding of risk? We were pressured to find ways to grease the
  wheel.
- Too much micromanagement.
   (b) (6)

- (b) (6) blocks communication between the Risk Assessors and the Risk Managers.
  (b) (6) told the Risk Managers to stop contacting Risk Assessors and Human Health Assessors.
- Companies had control of the regulatory outcome. EPA lost control of the regulatory outcome.
- (b)(6) has caused problems and protects (b)(6).
- (b) (6) (b) (6)
- (b) (6) was accused of changing reports to "no risk." (b) (a) left the agency.

# 3. How would you describe the culture of the New Chemicals Division?

- Risk Management Branch is positive, happy, and helpful
- In Risk Assessment Branch, the Eco assessors, toxicologists, and fate assessors are mean, hostile, and combative.
- (b) (6) lied to the supervisor that this individual threatened [9] (6) requested an investigation. After the investigation, the (b) (6) was cleared.
- The (b) (6) doesn't assess things correctly, is not good in Human Health, and couldn't manage complex issues.
- (b) (6)
- (b) (b) (c) (b) (d)
- (b) (6) didn't promote from within for the team leader vacancy.
- On the conference calls with companies, the Risk Assessors are afraid to talk when is there. They complained that was putting the Human Health assessors on the spot. There is a fear of retaliation on the PARS or in biweeklies.
- The scoping meetings originally were attended only by staff. After the reorganization, (b) (6) started attending. The staff was uncomfortable with attendance. It contributed to the atmosphere of fear.

# 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?

- Hire more Ecotox Assessors and Human Health Assessors.
- Keep the Risk Management supervisors.
- Remove (b) (6)
   from their jobs.
- Restore people taken out of their jobs in both the Risk Assessment and Risk Management Branches.
- (b) (6)

- (b) (6) is very hostile and makes false complaints about the Risk Assessors. Branch and Division leadership side with (b) (6) and 'come after' the Risk Assessors. (b) (6) know there is a pattern of lying with (b) (6).
- No more unwarranted fact-finding investigations.
- Separate scientific disagreements from PARS
- Empower staff when scheduling conference calls.
- Reinstate scoping meetings for staff only.

## 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:

- ~ Branch Level
- ~ Division Level
- Continue to build positive relationships with companies through capacity building, public webinars, and new chemicals training.
- That will help with improved submission.
- Great way to improve a positive relationship with the regulated community.

#### 6. What are the most important next steps?

- Leadership reorganization.
- Conduct public webinars with the regulated community. An educated community is more likely to submit quality submissions.
- Allow the people who want to come back to NCD, especially (b) (6)

## **INTERVIEW #2**

## 1. What do you appreciate most about working in the New Chemicals Division?

- They bring in new employees at low-grade levels. I wouldn't be here if they hadn't given me that chance. I began in March 2016.
- In the Risk Management Branch, we work as a team.
- The approach has changed.

## 2. What challenges are you facing in getting your work done?

- Since the reorganization, the whole division is not a team. Before you could go to the
  assessors and ask questions and get things taken care of. Now people are rude and
  unprofessional.
- One individual verbally attacked her boss. Verbal abuse.
- Disrespectful political DAAs. A Branch Chief said, "Fire me over it." "I can arrange that." said the DAA.
- The Risk Assessors take data from the companies and make assessments. Risk Managers mitigate the risk and make determinations.

- The Risk Managers cannot talk to the Risk Assessors. This situation existed before the reorganization.
- People are leaving. There are resource issues and scientific integrity issues.
- There are backlogged cases from 2016 with a solution. They can't move forward because the Human Health Assessments need to be updated.
- People are fearful of (b) (6).
- Very appreciative of the AA, Michal Freedhoff.
- Part of my frustration is that I have a substantive background but I'm unappreciated.
- PARS are done at a high level but don't reflect nuances of the work.

#### 3. How would you describe the culture of the New Chemicals Division?

- Nothing positive
- Oppressive
- Extreme pressure by all levels of management up to the OPPT IO.
- The ever-changing policies make it difficult to manage with submitters.

## 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?

- Work as a team like in 2016. Well-oiled machine. Respect. Questions were encouraged. Get back to a team environment.
- Need more resources on the Risk Assessment side. Especially while they work through the Scientific Integrity issues.
- Before the reorganization, the Risk Assessment Division was pulled in many different directions existing chemicals or new chemicals.

## 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:

- ~ Branch Level
- ~ Division Level
- Division Needs more resources, to work as a team, and increased access to work together. Better communications and transparency. Solid policies so that they are not continuously changing
- Branch Acquire the information needed to get the work done.
- OCSPP Communications to be more frequent and transparent on the future and what people are working on. We don't know where we are headed.
- Listened to the AA's testimony at her hearing. It was really helpful. It would also be helpful to know the AA's priorities.

#### 6. What is the most important next step?

- Recruit additional Human Health resources.
- Get information to complete the work.

### 1. What do you appreciate most about working in the New Chemicals Division?

- Loved the staff.
- Personally recruited 24 people to join the New Chemical Division.
- Fun, cohesive, supportive, sharing group.
- Like a family. Happy hours. A tight group
- The best things about the New Chemicals program were collaborating with the staff and learning from them.

#### 2. What challenges are you facing in getting your work done?

- The biggest challenge is the (b) (6)
- People are made to cry regularly.
- Pressure to get things done. Got worst with Trump and the new TSCA.
- Under the previous (b) (6) the new TSCA was enacted in 2016, everything had to be redone. That (b) (6) led the division to accomplish that challenge.
- Under the Trump administration, (b) (6) ran an ad hoc committee. Nothing was in the database. Everything was secret.
- All authority was taken away from Branch Chiefs and Division Directors. Everything was managed at the Office Director level.
- There was no trust.
- (b) (6) reviews every document. (b) (6) can be very hostile.
- creates a sense of fear in the organization. (b) (6) sends emails at midnight and expects a response first thing the next morning. (b) (6) is responsible for the culture of fear.
- When (b) (6) was (b) (6) , (b) (6) was uncooperative and very difficult.
- The (b) (6) was reassigned to (b) (6) Very talented people applied for vacancy. (b) (6) was selected. Nobody knew (b) (6).
- (b) (6) wanted to please the (b) (6)
- (b) (6) made some questionable personnel decisions. (b) (6) forced (b) (6) (b) (6) to retire. (b) (6) stripped (b) (6) duties. (b) (6) kicked a rule writer off a rule.
- (b) (6) still doesn't know the substance of position. (b) (6) "freaks out" and makes difficult demands on position.

## 3. How would you describe the culture of the New Chemicals Division?

- (b) (6) would have us meet with of at 8 am every day to ask the number of PMMs done since the day before. Things are still bad.
- [b] (6) doesn't know the work and lacks leadership skills and (b) (6) is hostile.

- The managers perpetuate a culture of fear.
- 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?
  - There was very little participation in one of the listening sessions because (b) (6) buddy was logged on to spy.
  - People have been disappointed with the new administration that there have been no management changes.
  - (b) (6)
  - (b) (6) was just nominated for an award for [9] leadership.
  - The culture will not approve as long as the current managers are protected and in place.
- 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:
  - ~ Branch Level
  - ~ Division Level
  - (b) (6)
  - (b) (6) needs to go. (b) (6) altered the science using a different analog.
  - Recruit new people with a ton of Emotional Intelligence.
  - Great process changes and innovations have been made.
  - NCD was a wonderful place to be. They are having a hard time recruiting because of the managers, not the nature of the work.
- 6. What are the most important next steps?
  - Create stability within the program.
  - Select an Office Director for OPPT.
  - Make changes in the Management.
  - People need to be heard and what they say needs to be acted upon. Only then change will happen.

- 1. What do you appreciate most about working in the New Chemicals Division?
  - Sense of purpose and working in a community of talented scientists who support the mission of EPA.
  - People like the mission of the agency.
  - Profound motivation in developing others.
  - Great satisfaction in developing people and coaching them.
  - Good relationship with staff, coaching, understanding their interests.
  - The opportunity to use all the talent to transform the NCP into a world-class science organization.

• You see how your science is affecting the American people and the US economy.

#### 2. What challenges are you facing in getting your work done?

- For years, the New Chemical program had been neglected before the new TSCA amendments. It lacked proper staffing and management structure.
- The infrastructure is insufficient. Weak IT infrastructure and databases.
- Did not keep up pace with the science through the years.
- There were more requirements with Lautenberg
- The last 2 years were very demoralizing for the staff. The Administration was very aggressive about cutting the budget and people.
- It has become a very combative organization, especially with Scientific Integrity complaints.
- In addition to the lack of resources and deficient IT infrastructure, (b) (6)
   (b) (6)
   (c)
  - An ineffective leader.
  - No understanding of the Risk Assessment process.
  - No clue about the science portfolio.
  - Cannot manage a science organization
  - o Demonstrates manipulative behaviors affecting the morale of the staff.
  - o Creates a hostile work environment with a total lack of trust across the team.
  - Pits people against each other.
  - Works behind supervisors' backs.
  - Comfortable with the Risk Management branches but not the 3 science branches.
  - Has a problem accepting other perspectives.
  - Does not like to be challenged in front of others.
- Complexities of dealing with an employee's conduct and performance issues who becomes a whistleblower.
- Recruiting aggressively nonstop for the last several years. Candidates don't have the basic skills. Competing with other program offices. HR process is very slow.
- The focus for the supervisor is to clear cases as a Sr Toxicologist which puts recruitment and team training on the back burner.
- (b) (6) had a division retreat in January where we developed a Strategic Plan for the division including core values, behaviors, and goals. It was never implemented.

## 3. How would you describe the culture of the New Chemicals Division?

- Trust issue in the management team creates a hostile environment.
- People don't want to touch other people's assessments because of fear. This fear has been stalling the productivity of the program since the summer.
- (b) (6) overpromises with the management team and doesn't consult with the branch chiefs.
- The quality of the assessments is a problem. There is not enough senior staff to do a critical review of the problems.

- (b) (6) puts the Human Health team on the spot in meetings because (b) (6) doesn't understand the issues.
- Many areas of tension. And poor communication with the management team.
- (b) (6) hides (b) (6) tracks well, but it's all talk. (b) (6) does 'weird stuff' behind the scenes.
- 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?
  - Build a high-performing team.
- 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:
  - ~ Branch Level
  - ~ Division Level
  - Walk the talk. Team coaching. Improve relationships. Neutral parties help to build trust in the organization.
  - Engage a facilitator to guide the team on the journey.
  - Schedule a retreat
  - Focus on healing and moving forward
  - Do what's best for the division
  - Protect our employees
  - Foster collaboration
  - Hire more people
- 6. What is the most important next step?
  - Build trust among the management team.
  - Increase staffing. Rational recruitment. Not just "butts in the chairs."

- 1. What do you appreciate most about working in the New Chemicals Division?
  - Exciting, fast-moving, and challenging
- 2. What challenges are you facing in getting your work done?
  - The biggest challenge is how to develop the best Human Health Assessment in a timely manner that will pass the internal and external rigors.
    - Receive between 400 and 500 applications a year which must be turned around in 30 to 90 days.
    - Since Lautenberg, every chemical has to have an assessment that has to be generated and reviewed.

- The staff has been completing the work, but management reviews have not been completed timely.
- The evaluation has 6 reports. The Human Health Assessment is the only report that requires a narrative that can run from 15 to 50 pages each.
- The second main challenge is the CBI LAN. Everything is done behind a firewall not connected to the internet because of CBI.
  - IT Enterprise architecture only has 2 systems not connected. The CBI LAN receives no support from the agency. It is an antiquated system with its internet that still uses Lotus Notes.
- Before the reorganization, the New Chemicals program had double the health staff.
  - The most senior people were moved after the reorganization.
  - The belief was that Existing Chemicals would need more people.
  - Because of Lautenberg and the increased fees, it was felt the New Chemicals Division would get a lesser number of applicants.

#### 3. How would you describe the culture of the New Chemicals Division?

- There are 3 science branches the Industrial Chemistry Branch and the two 2 Risk Assessment Branches.
- (b) (6) . Chemistry is the only discipline in that branch that enables them to stay in their lane. Most staff are very happy.
- The two Risk Assessment Branches are composed of mixed disciplines.
- There is more of a discipline culture rather than a branch culture.
- Disciplines meet weekly or biweekly with themselves and other divisions in a technical team structure.
  - The Exposure team and Eco team are very tight and functional. There is open communication. A good collaboration with DGAD. Chemistry and Risk Assessment.
  - The Environment Fate group is decimated. There are only 2 scientists plus a brand-new hire. They are functional but under severe stress.
  - Engineering is more dysfunctional.
  - Human Health Assessment is the most dysfunctional. People are afraid to speak. They fear their statements will be misread. Working from home has made the situation worse.
- (b) (6) . The culture is strained but professional. Conversations are difficult.

# 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?

- Most of the one is out of touch with the day-to-day work. (b) (6) don't understand the work, especially on the risk assessment side. Can't expect the deputies to learn the risk assessment side. (b) (6) and the other deals with management issues.
- Modernize the IT infrastructure with CBI.

• Be more transparent on how we do our work with all stakeholders.

## 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:

- ~ Branch Level
- ~ Division Level
- Organize the branches by discipline Hazard, Eco/exposure, Fate, Engineering.
   Recruit branch chiefs and team leads experienced in that discipline.
- One single report in place of 6 differently formatted reports. Used to do that.
- Too many meetings and too many reports. There was a LEAN event to limit the number of meetings.
- Everybody is stuck on a linear approach and siloing with no attempt to integrate.
- Division level:
  - Members of the IO should attend the discipline meetings to learn and show interest. It will earn respect.



### 6. What is the most important next step?

- Address the antiquated IT infrastructure
  - o Can we operate without the CBI LAN?
  - Ability to buy proprietary toxicity prediction software used by companies to check the applications.
- Staffing
  - People don't want to come to NCD because we are a dysfunctional overworked group.
  - Work on getting our act together.
  - o Ability to hire graduate students and postdocs to work on CBI never allowed
  - Collaborate with ORD on the New Chemicals immersion experience.
- Update the PMN application, the 720 rule.
- Establish a New Chemicals subcommittee on the FACA.

## **INTERVIEW #6**

## 1. What do you appreciate most about working in the New Chemicals Division?

- In the past:
  - NCD had a collaborative environment.
  - There were opportunities to be creative about problem-solving.
  - Enjoyed quickly evaluating chemicals.
  - Collaborated with a team of brilliant individuals.
  - A healthy scientific argument was encouraged.
- Today:

- Disposition Meetings with management are hostile and scientists were openly disparaged by (b) (6)
- o (b) (6) pushes cases through and makes the hazards "go away." will make calls on the hazards without full knowledge of the different assays. If is questioned, is likely to retaliate against the person who asked the questions.
- A "win" for NCD is to get the chemical into commerce. Staff and managers are rewarded and praised for making the hazards "go away."
- Inexperienced staff and inexpert staff are making calls outside their disciplines and making decisions that should not be made.
- o **(b)** (6) obstructs scientists using existing processes, e.g., the QA/QC process. is stealthy in applying pressure to get the change that wants by calling scientists directly.

## 2. What challenges are you facing in getting your work done?

- Retaliation from supervisor in performance reviews, not often asked to participate in professional development activities for training new scientists.
- The interviewee was granted funding to attend the Society of Toxicology meeting but wasn't given time to attend the conference. The interviewee was still required to do her regular work. "We were already being overworked and this was just too much."
- The interviewee became physically ill from the stress in NCD.
- through assessments after changing them without telling the scientist responsible for the hazard assessment. Now, to the scientist responsible for the hazard assessment. Now, to the scientist responsible for the hazard assessment.
- (b) (6) asked for a button to bypass the QA/QC protocol and the proper risk assessment protocol.

## 3. How would you describe the culture of the New Chemicals Division?

- No trust.
- Management has requested that staff file a complaint against the interviewee.
- The interviewee has been told to stop talking in meetings on several occasions.

# 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?

- See answers to other questions.
- 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:
  - ~ Branch Level
  - ~ Division Level
  - Overhaul of program.

- (b) (6)
  - With excellent management skills
  - With an understanding of psychology to address the cycle of abuse
  - o (b) (6)
- Retrain staff.
- Restore experts who were reorganized into other organizations.

#### 6. What is the most important next step?

- The Administrator needs to give us an update on IG complaints.
- Make NCD emotionally safe. Must support the individuals that have come forth.
- The Agency needs to uphold scientific integrity and transgressors must have consequences for their actions.
- Need to ask if a safety finding can be made with the information and data available and ask what information and data are needed to make a safety finding.
- Need a standard procedure for how we communicate with the submitters.
  - Blocked from consultations with submitters. This is a huge obstacle to getting the work done.
  - Need a process to secure information and data when we don't have enough.
  - Who comes to the table from EPA and the submitter?
  - o BPBD (b) (6) has a standard procedure in OPP. We could begin there.
  - Submitters are limited in who they can contact. They are not allowed to contact the Interviewee directly. They must communicate through RMB and NCD.
- Need more consistency in our schedule.
  - o In the past, we knew our schedule 3 months in advance.
  - Now scheduling is haphazardly done, and cases are beginning to overlap.
- Need more staff.
  - Need at least 4 people on each rotation, with a mix of junior and senior staff.
  - o Need overlapping knowledge in various disciplines.
- I hope that we rebuild NCD.
  - We need more funding and more FTEs.
  - By NCD properly doing their job, it reduces the burden on the existing chemicals program (e.g., PFAS, BPA) and reduces the risk to human health.
  - Needs better organization and more structure.
- Need more competent management so we don't feel afraid to come to work.
  - These are fundamental moral and character issues.
  - o (b) (6)
- Measures of Success
  - Rewarded for turn-over of cases.
  - Not rewarded for safety findings.

#### **INTERVIEW #7**

1. What do you appreciate most about working in the New Chemicals Division?

Collaborating with the people.

#### 2. What challenges are you facing in getting your work done?

- Unrealistic expectations. Get work done fast, not right.
- Excessive workload due to whistleblowers.
- Need to do our job and protect human health, rather than push things out the door.
- Need more staff.
- Too much work, and not enough of us.

#### 3. How would you describe the culture of the New Chemicals Division?

- Obey orders, do the work, don't make waves, placate the chemical companies, do it fast, do it faster.
- Pats on the back only for following orders without whining.

# 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?

- Need career development.
- Stop the mission abandonment.
- Stop worship at the shrine or get it done fast.
- Management needs to support their staff.

## 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:

- ~ Branch Level
- ~ Division Level
- (b) (6)
- Make the workload reasonable.
- Get management to support their staff. Especially the scientists.
- When promoting technicians to management, provide training on management skills.
- Retrain staff.
- Keep RMB good.

#### 6. What is the most important next step?

- Need managers to behave ethically and trust the rank and file.
- Need managers who get the job done on time correctly and take care of the staff.
- Keep remote working highly utilized and flexible.

- 1. What do you appreciate most about working in the New Chemicals Division?
  - Collaborating with the people.
  - Fast-Paced, new things to do, every day is a challenge.
- 2. What challenges are you facing in getting your work done?
  - Short turnaround times and interference from above.
  - Lost team unity.
  - Other peers or colleagues called in to take over an assessment. Not informed by management.
- 3. How would you describe the culture of the New Chemicals Division?
  - Toxic
  - pushes very hard and overrides people.
  - Not allowed to discuss openly and disagree on scientific issues.
  - Lack of social gatherings. No team unity.
- 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?
  - Personnel changes.
  - Repair relationships using facilitated sessions to share feelings and talk about them.
  - Team building.
  - Hire new people, and train mindfully and intentionally.
  - Need better training and training materials.
  - Document standard operating procedures and processes.
- 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:
  - ~ Branch Level
  - ~ Division Level
  - Personnel changes.
  - Document standard operating procedures and processes.
  - Re-emphasize team building and hiring.
  - Hire new people many new people.
  - (b) (6) is difficult to work with.
  - Make the workload reasonable. Coverage issues are problematic.
- 6. What is the most important next step?
  - Documenting procedures to set up a virtuous cycle.

- Treat every case the same way and be objective about it.
- The growing pains of a new regulatory program need addressing.

#### 1. What do you appreciate most about working in the New Chemicals Division?

- · Being the first set of eyeballs for new chemistries
- Stress due to newness

### 2. What challenges are you facing in getting your work done?

- Not enough time to pay attention to detail on the risk assessment
- New hires not getting a lot of training
- Communication is inadequate.
- The branch chief has too much work to give staff attention.
- Need standard operating procedures.
- Staff collaboration and cohesion are just not there (RAB).

#### 3. How would you describe the culture of the New Chemicals Division?

- Toxic. RAB1 is extremely toxic. It has been made worse by whistleblowing.
- So bad interviewee considered quitting. Very high turnover.
- Work overload with no solutions in sight.

# 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?

- Approvals should be by scientists, not the branch chief.
- Fewer meetings. Many meetings prevent work from getting done.
- Managers only care about meeting deadlines. PARS is about numbers.

## 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:

- ~ Branch Level
- ~ Division Level
- Hire more people
- Build team cohesion.

#### 6. What is the most important next step?

- More people and extramural funds.
- Better workflow using tools for tracking purposes.
- Documenting SOP's and centralized location for procedures.

- Better training, education, and communication
- Put step-by-step instructions on SharePoint for how to get through a case.

#### 1. What do you appreciate most about working in the New Chemicals Division?

- RMB good people to work with.
- Good supportive atmosphere.

#### 2. What challenges are you facing in getting your work done?

- Risk management work's main challenge is that they need risk assessments.
- Staff retention is an issue in risk assessment branches.
- (b) (6) (b) (6)
- RMB workload is overall a lot more manageable.

#### 3. How would you describe the culture of the New Chemicals Division?

- RMB has a lesser workload than RAB.
- Chemical companies are not happy with how slow things are moving.
- Branch chiefs and team leaders doing a good job.
- Previously focused on productivity, now less focused on numbers.

# 4. What changes would you like to see to improve the division? What aspects of the culture in the division should not be changed?

- Hire more risk assessors.
- Need more people to do the management review.
- Separate Branch Chief from management reviewers.
- If the manager has a different scientific opinion than the staff, then it makes it difficult for the staff to disagree.

## 5. What would be the most helpful actions that could be taken to improve the New Chemicals Division at the:

- ~ Branch Level
- ~ Division Level
- Hire more people
- Build team cohesion.

#### 6. What is the most important next step?

Need something to come out of listening sessions/investigation. Not business as usual.

- More people.
- OCSPP has new policies for resolving differing science opinions; How do they work?
- Shift management review from branch chiefs.
- Separate science reviews from performance reviews.
- Fix RAB.