Streamlining the Development of Priority Product Profiles

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Steelhead behaviors

- SharePoint
  - Internal communication
  - Don’t reinvent the wheel
- Public meetings best practices
- Documenting processes
  - Project management roadmap
  - Chemical Product Evaluation Team (CPET) toolkit
  - Workflow analyses for CalSAFER
  - Petition process workflow analysis & checklist
- Lessons learned meetings after major milestones
1. Candidate Chemical List
2. Priority Products
3. Alternatives Analysis
4. Regulatory Response
The SCP process

The Four-Step Framework for the SCP Regulations

Candidate Chemicals
- Universe of Chemicals
  - Authoritative Lists
    - Candidate Chemical List

Product-Chemical Combinations
- Universe of Products
  - Proposed Priority Products
    - 3-yr Priority Products Work Plan (with Product Categories)

Rulemaking
- Rulemaking
- Priority Product Listing Regulations

Alternatives Analysis (AA)
- Range of Alternatives
  - First Stage AA
  - Preliminary AA Report
  - Second Stage AA
  - Final Stage AA

Regulatory Responses (RR)
- Possible Responses
  - No Regulatory Response
  - Additional Information to DTSC
  - Product Information for Consumers
  - Use Restrictions / Product Sales Prohibition
  - Safety Measures / Administrative Controls
  - End-of-Life Management
  - Advancement of Green Chemistry / Engineering
2015 – 2017 Priority Product Work Plan

- Building Products
- Household/Office Furniture & Furnishings
- Cleaning Products
- Office Machinery (Consumable Products)
- Beauty, Personal Care, and Hygiene Products
- Fishing and Angling Equipment
- Clothing
Chemical – Product Evaluation Team (CPET)

- ~15 technical staff who:
  - Research chemicals and products
  - Identify potential Priority Products
  - Engage with the public
  - Develop Priority Product Profiles

- Led by André Algazi
A continuous improvement culture

- “Lessons Learned” meetings
- Lean Six Sigma Green Belt project via GO-Biz
  - **Objective**: complete 95% of Priority Product Profiles in 1 yr
  - **Baseline**: unknown, likely 3 to 3.5 yr
  - **Primary metric**: time to finalize Priority Product Profiles
  - **Secondary metrics**: quality and cost
Key Lean Six Sigma principles

- Eliminate waste
- Break down siloes
- Simplify and mistake proof the process
- Build decision-making into the process
- Standardize the work
- Develop a flexible workforce
- Use single-piece flow (vs. batches)
- Strive for good communication
- Use feedback from data to continue improving
- 4 phases
- 83 steps
- 14 VA steps
- 2 regulatory requirements
- 14 decision-making steps
Which work phase took longest?

Process Map Time Analysis (Pareto Chart)

- **Phase**: Product Scoping
  - **Duration [days]**: 304
- **Phase**: Public Engagement
  - **Duration [days]**: 212
- **Phase**: Chemical Scoping
  - **Duration [days]**: 149

# of days: 700

Percent: 100
Which work step(s) took longest?
Which decisions took longest?

- Public engagement to profile writing: 15 days
- Public engagement: 53 days
- Product scoping to public engagement: 101 days
- Chemical to product scoping: 88 days

4 work days remain out of one year
Our challenges in decision-making

- Uniqueness and complexity of our regs
- Diversity of factors to be considered
- Regulatory framework vs. traditional expertise
- Varied understanding of the regs
- Misalignment of priorities
- Balance of science and policy
Critical x’s (root causes of problems)

- Internal communication and decision-making
- External communication
- Research approach
- Toolkit
Improvements to internal communication and decision-making

- Align management-staff expectations and set boundaries for research at process start
- Be transparent about executive decisions
- Track decision-making time
Improvements to external communication

- Solicit chemical-product nominations prior to scoping
- Reach out to trade associations upfront
- Draft stakeholders list and engage stakeholders early
Improvements to research approach

• Ensure chemicals of emerging concern are included
• Combine chemical and product scoping phases
• Update scoping guidance
• Develop guidance for dealing with data gaps
• Schedule workshops at process start
• Perform peer review sooner and streamline QA/QC
Improvements to toolkit

• Update and expand the “CPET Manual”
• Streamline the scoping templates
• Eliminate the Internal Summary Report
• Improve reference and document organizing
• Hold regular trainings
Phase 1 (Chemical Scoping)
- Divide staff into teams by Work Plan product category
- Compile and evaluate tools with information towards each Policy Priority
- Develop a research approach / workplan
- Identify which chemicals relate to each policy priority within each product category
- Update management
- Write up chemical scoping approach summary
- Present to CPET and management
- Create matrix of options for Phase 2 (“Mardi Gras” Matrix)
- Management deliberates

Phase 2 (Product Scoping)
- Develop team assignments for Phase 2
- Scope products
- Create Product Scoping Team Findings Matrix for Phase 2
- Present to CPET and management
- Generate and develop topics for Phase 3
- Create one pagers for each proposed workshop topic
- Create matrix of topics for Phase 3
- Management deliberates
- Management approves

Fill out Other Regulatory Programs Template

Management deliberates
- Create matrix of options for Phase 2 (“Mardi Gras” Matrix)
- Assess staff’s time availability and expertise
- Project managers prepare project management docs for Phase 3
- Management approves
New process map - Scoping

Phase 1 (Chemical-product Scoping)
- Hold CPET-management meeting to decide research approach, scope, timeline, etc.
  - Divide staff into teams
  - Compile or update tools with information towards each Policy Priority
  - Scope chemical-products

Phase 0 (Work Plan Development)
- Request chemical-product nominations
- Start assembling stakeholders list and reach out to trade associations

- Write up chemical scoping approach summary
  - Present to CPET and management
  - Prepare documents for briefing

Management deliberates
- Generate and develop topics for Phase 3
- Project managers prepare project management docs for Phase 3

Management approves
New process map – Public engagement
Initial process map – Profile writing
New process map – Profile writing
## New capability analysis

<table>
<thead>
<tr>
<th>Phase</th>
<th>Current Duration</th>
<th>Target Duration</th>
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</thead>
<tbody>
<tr>
<td>Scoping</td>
<td>453 days (~15 months)</td>
<td>120 days (4 months)</td>
</tr>
<tr>
<td>Public engagement</td>
<td>~260 days (~9 months)</td>
<td>120 days (4 months)</td>
</tr>
<tr>
<td>Profile writing</td>
<td>~600 days (~20 months)</td>
<td>300 days (10 months)</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>~3.5 years</td>
<td>1.5 years (1 year for program work)</td>
</tr>
</tbody>
</table>
“Do. Or do not. There is no try.”

- Implement improvements in next Work Plan period
- Communicate new expectations and train staff
- Update the instructions to teams
- Solicit feedback, adjust as needed
- Keep record of actual time spent:
  - Scoping
  - Preparing for workshops
  - Writing technical documents
  - Decision-making
Benefits across the program

- Improved work satisfaction and ownership
- More effective and efficient use of resources
- Greater flexibility
- Inspiration to:
  - Be waste-conscious
  - Break down silos
  - Go lean
Thank you!

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