

**Research and Development Classification Process Survey Results
of Session 7 Participants**

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February 5, 2004**

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The Research and Development Classification Process (RDCP) was established in July 2001 as the process by which the work and qualifications of high-grade (GS-13 to GS-15) scientists and engineers employed by NASA Langley Research Center are classified and any subsequent personnel actions are effected. The key characteristic of this process is application of the Office of Personnel Management (OPM) classification guides and standards through a consensus decision-making process of peer scientists and engineers. A panel of such peers is convened to provide technical review of the assignment, impact, and qualifications that the employee brings to the position. RDCP panel chairs and members are non-supervisory Langley employees. The Office of Human Resources (OHR) effects the recommendations of the panels in terms of updating the employee's position classification and any resulting promotion. The selection of employees for review in the initial nine sessions was determined by random weighted assignment and some limited management requests for those already identified as ready for review or needing deferral. All of the approximately 800 employees initially assigned to a session are to be reviewed between the summer of 2001 and the summer of 2005. Seven sessions have been conducted to date (starting in August 2001), reviewing a total of 520 employees in about 54 branches across 58 panels involving a total of 384 employees as panel members. The process has resulted in 199 employees' jobs classified at their current grade, 269 classified at the next highest grade, two classified below grade, with the remainder to be reviewed again due to either insufficient information or appropriate Guide not applied. This paper describes the results of a survey conducted with participants of the seventh RDCP session and briefly compares it with results of earlier surveys of Sessions 1 through 6 participants. The purpose of the survey was to provide information about how well the process is working and where it may need improvement.

A simple survey (see copy in Appendix A) was posted on the internal LaRC web for three weeks (January 7 through January 28, 2004) in order to obtain feedback from RDCP participants in Session 7. Responses to the 18 items were anonymous and voluntary.

Session 7 Survey Results

Sixty-three out of the approximately 163 Session 7 participants responded to the survey, a 39% response rate: 8 out of 33 Branch Heads, 26 out of 57 panel members, and 29 out of 73 reviewees. (This response rate is lower than for previous surveys that have averaged around 58%, perhaps because no reminders were sent as was usually done.) Table 1 is a summary of the responses for all of the questionnaire items. (Items 5 through 16 were ratings from 1 (strongly disagree) to 5 (strongly agree), with 0 meaning no opinion or not applicable.)

Table 1. Summary of Responses to Questionnaire Items 1 through 17 for Session 5 (with “No Opinion” responses omitted)

Item No.	Item Name	N	Minimum	Maximum	Mean	Std. Deviation
1	Session participated	63	na	5.0	na	na
2	Guide used	63	1.0	2.0	na	na
3	Hours spent	63	4.0	160	64.2	29.6
4	RDCP Role	63	1.0	3.0	na	na
5	Fair selection	45	1.0	5.0	3.29	1.12
6	Adequate training	60	1.0	5.0	3.63	0.93
7	Adequate handbook	59	1.0	5.0	3.58	0.89
8	Understandable process	61	1.0	5.0	3.72	0.90
9	Clear criteria	61	1.0	5.0	3.15	1.01
10	Conducted consistently	60	1.0	5.0	2.97	1.28
11	Improved classification process	52	1.0	5.0	3.40	1.40
12	Improved promotion process	56	1.0	5.0	3.33	1.59
13	Improved morale	62	1.0	5.0	2.90	1.38
14	Adequate time	57	1.0	5.0	4.35	0.92
15	Agree with panel	61	1.0	5.0	3.79	1.27
16	Report adequate	58	1.0	5.0	3.59	1.40
17	Reviewee decision category	28	1.0	4.0	na	na

The average number of hours recalled being spent on the RDCP was about 64 but with statistically significant differences between branch heads (average 26 hours, standard deviation of 19.8 hours), and panel members (average 71 hours, standard deviation of 25.6 hours), and reviewees (average 68 hours, standard deviation of 27.7 hours). There was no significant difference between reviewee and panel member average time spent.

In general, the average rating scores were between 2.90 and 4.35. The average rating score of at least 3.0 (neither disagree nor agree) is used here as an arbitrary criteria for areas which are doing well. All but two of the twelve items had average ratings greater than or equal to 3.0. Those two items, Conducted Consistently (item 10) and Improved Morale (item 13), had average ratings close to 3.0 (2.97 and 2.90, respectively).

The only significant differences in any items by role of participant were for Item 8 (Understandable Process) and Item 14 (Allowed Adequate Time). For item 8, the branch heads indicated strong agreement that the RDCP was an understandable process (average rating of 4.5) than either the panel members or reviewees, although their average ratings were not especially low (3.81 and 3.48, respectively). For item 14, the branch heads did not agree (average rating 2.5) that they had adequate time to work on the RDCP although

the panel members and reviewees did agree (4.4 for both). From the comments, the lack of time for at least some of the branch heads was due to other duties.

The fact that 73 percent of all the respondents agreed or strongly agreed with the panel results is a very good indicator that RDCP is a process that provides valid results. Interestingly, the 5 of the 7 branch heads responding to this item agreed or strongly agreed with the panel results. Of the reviewees, 20 of the 27 respondents had been evaluated as above grade. They gave an average rating of 4.05 for Agree with Panel Decision (item 15), indicating strong agreement with the panel results. However, the 5 respondents who had been evaluated at grade had an average rating of 2.40, which indicated they disagreed with the panel results. This was a statistically significant difference.

When Improved Morale (item 13) average ratings within reviewees were compared with the actual panel decision results, there was a significant difference by panel decision category. Not surprisingly, those 20 reviewees who received promotions gave an average rating of 3.3 to the question about improved morale, whereas those 8 who remained in their current grade gave an average rating of 1.75 for this item. This difference was statistically significant.

Table 2. Practically Significant Correlation Coefficients ($r \geq .45, p = .00$) for Session7 participants

Item	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16
Q3	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Q4		1	-	-	-	-	-	-	-	-	-	-	-	-
Q5			1	-	-	.47	-	-	-	-	-	-	-	-
Q6				1	.84	.64	.53	-	-	-	-	-	-	.54
Q7					1	.71	.61	-	-	-	-	-	-	.53
Q8						1	.54	-	-	.51	.46	-	.45	.56
Q9							1	.59	.68	.59	.64	-	.53	.61
Q10								1	.68	.71	.69	-	.64	.53
Q11									1	.87	.77	-	.58	.47
Q12										1	.79	-	.56	.48
Q13											1	-	.54	.50
Q14												1	-	-
Q15													1	.85
Q16														1

Responses were examined in terms of correlations among items. A statistically significant correlation coefficient equal to or greater than $r = .45$ was considered to be of practical or meaningful significance. From Table 2, above, items 6 (Training), 7 (Handbook), and 8 (RDCP Understandable Process) are correlated, which is to be expected as they are all related to training and understanding the process. Item 16 (Adequate Report) is correlated with nine items, more than any other item. However, a multiple regression analysis indicated that Item 15 (Agree with Panel) significantly

accounted for the most variance (71%) in the average rating for Item 16. Apparently, agreeing with the panel decision is important in deciding that the panel report is adequate. Training (item 6) also contributed to explaining some variance (4%) in average rating for Adequate Reports (item 16).

Even though Improved Morale (item 13) was correlated with items 8 through 12, most of the variance (61%) in the average ratings for Improved Morale was due to rating RDCP as an improved promotion process (item 12). Ratings for RDCP being conducted consistently and having clear criteria also explained some variance in improved morale ratings, 8% and 3%, respectively.

Summary of Comments

A summary of comments received by the respondents is in Appendix B. In general the comments dealt with comparison of the RDCP to perceptions of the old promotion process, role of management, concerns about the time involved, and concerns about consistency. Both positive and negative comments were received. All comments were read and studied. (The Advisory Committee did receive all the unedited comments for their own reading.) Some comments are indicative that more training and information are needed to clear up some misperceptions about RDCP.

Some general themes in the comments include the following: There are concerns with consistency in applying the evaluation criteria across sessions and panels and that interpretation of the criteria are too subjective. This related to comments about training as well. More definitions of the criteria are desired. The time involved in both preparation and evaluation is thought to be too great. Also, some people think Branch Heads should play all or more of a part in conducting the evaluations. However, others think that Branch Heads do not have the knowledge about the research or the individuals to be able to do this adequately. More attention to providing correct, but succinct, information in the reviewee packages was mentioned. Diversity of panel members was expressed as a good characteristic. Some respondents were concerned that panel members' personal opinions of reviewees affected evaluations while others thought the panels were very impartial and thorough. Concerns were expressed about Branch Heads and reviewees not understanding the purpose of the RDCP evaluation reports. That is, some respondents commented that they expected panel evaluation reports to provide feedback on what to do to get a promotion if a promotion was not received. (*Note: this is not the purpose of the RDCP reports. The reports are to document why the assigned scores were given, rather than what to do to receive other scores, such as those necessary for a promotion. In effect, this would be asking the panel to conduct an additional evaluation for each person.*) Some people never received their evaluation reports from their branch heads. In general, for a variety of reasons, some people thought RDCP was a good idea and some didn't.

As a result of this feedback, some changes are being made for Session 8. These include a clearer explanation of what is RDCP and what to expect from it, especially with respect to the panel evaluation reports. Also, the training will provide more information about the evaluation criteria. A status report will be written soon for general release that provides many data on results for Sessions 1 through 7.

Comparison of Session 7 Survey Responses with Previous Sessions

While ratings decreased slightly for some items from Session 6 to Session 7, these changes were not great. Overall, there was little change or some improvement in RDCP ratings from Session 6. In general, ratings increased from Session 1 to 7. (Results of Session 6 and earlier surveys can be found at <http://ohr.larc.nasa.gov/RDCP.html>.)

The average ratings for each item for each session are shown in Table 3. The highest ratings over all the sessions were for item 14, which means that most respondents were allowed adequate time for RDCP, even though in the comments people indicate that it is too time intensive. There was no difference in time spent on RDCP across the sessions and neither was there any correlation between time spent and the panel decision.

The next highest ratings were for items 15 and 8 that indicate respondents agreed with the panel decisions and that RDCP is an understandable process, respectively. These are two very important items indicating that the process is valid.

Table 3. Average responses to Survey Items for Sessions 1 through 7

ITEM	SESSION							TOTAL
	1	2	3	4	5	6	7	
Q3-Time spent	59.57	57.58	56.10	54.58	60.95	59.59	64.16	58.90
Q5-Fair Reviewee Selection	3.23	3.32	3.12	3.38	3.14	3.36	3.29	3.25
Q6-Training adequate*	3.15	3.11	3.46	3.67	3.70	3.69	3.63	3.44
Q7- Handbook adequate*	2.97	3.24	3.39	3.54	3.52	3.63	3.58	3.37
Q8- Understandable process*	3.30	3.43	3.55	3.67	3.60	3.76	3.72	3.55
Q9- Clear criteria*	2.63	3.02	3.00	3.24	3.06	3.24	3.15	3.02
Q10- Consistently conducted*	2.70	3.06	2.90	3.38	3.17	3.03	2.97	3.01
Q11- Improved classification process	2.84	3.24	3.02	3.26	3.28	3.39	3.40	3.19
Q12- Improved promotion process*	2.91	3.11	3.11	3.66	3.44	3.52	3.34	3.26
Q13- Improved morale*	2.39	2.61	2.69	3.03	2.93	2.84	2.90	2.74
Q14- Adequate time allowed*	3.63	3.72	4.10	3.97	4.19	4.16	4.35	3.97
Q15- Agree with panel decision	3.52	3.87	3.55	3.90	3.91	3.56	3.79	3.72
Q16- Adequate panel report*	2.58	3.06	3.24	3.71	3.60	3.25	3.59	3.24

* Significant differences among sessions

There were statistically significant differences across the sessions for many items, which are shown as starred in Table 3 above and are illustrated in Figure 1 below.

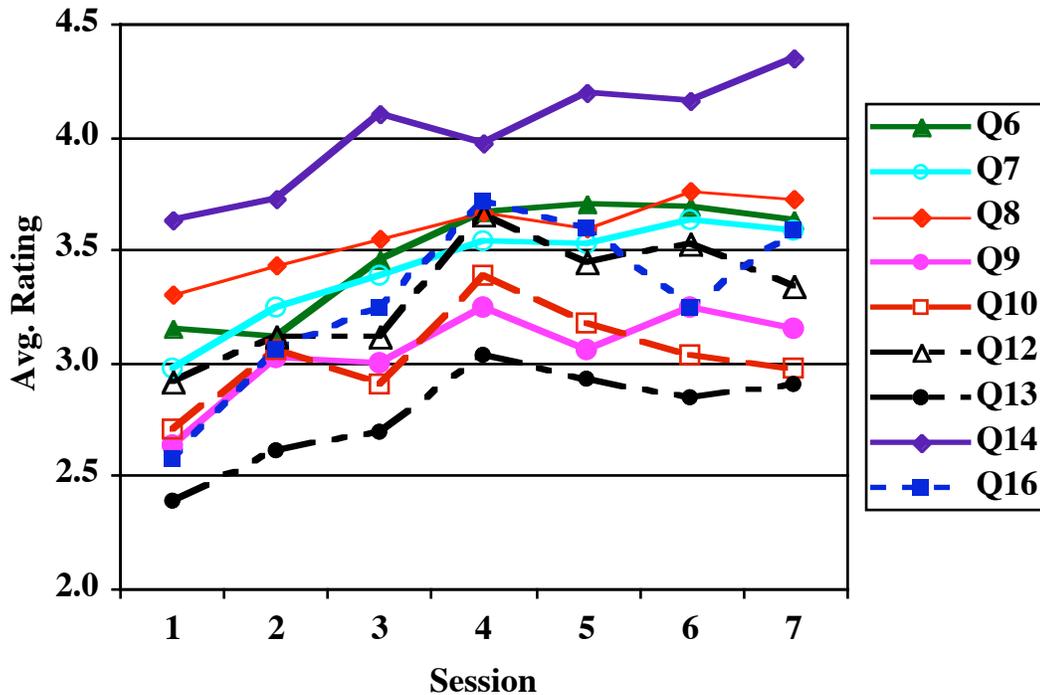


Figure 1. Significant differences in average ratings among sessions.

The ratings have generally increased between Session 1 and Session 7 indicating improvements in and/or greater understanding of the RDCP. Although there have been small fluctuations for some items across the sessions, all the ratings are higher for Session 7 than they were for the first session. However, even with this increase, the latest ratings for Item 10 (Conducted Consistently) and Item 13 (Improved Morale) are still marginally low. “Conducted consistently” includes the fact that changes have been made to the RDCP since the first sessions that encompass more than consistent application of the criteria. Thus, a low rating for this item may reflect those changes. Even so, increased attention will be spent on this item in future sessions to ensure consistent application of the evaluation criteria. Hopefully, as improvements are made to the RDCP, morale will continue to improve.

The average ratings for a few items have remained essentially the same across the sessions and did not differ statistically significantly. Except for Item 3 (Time spent on RDCP), these are illustrated in Figure 2.

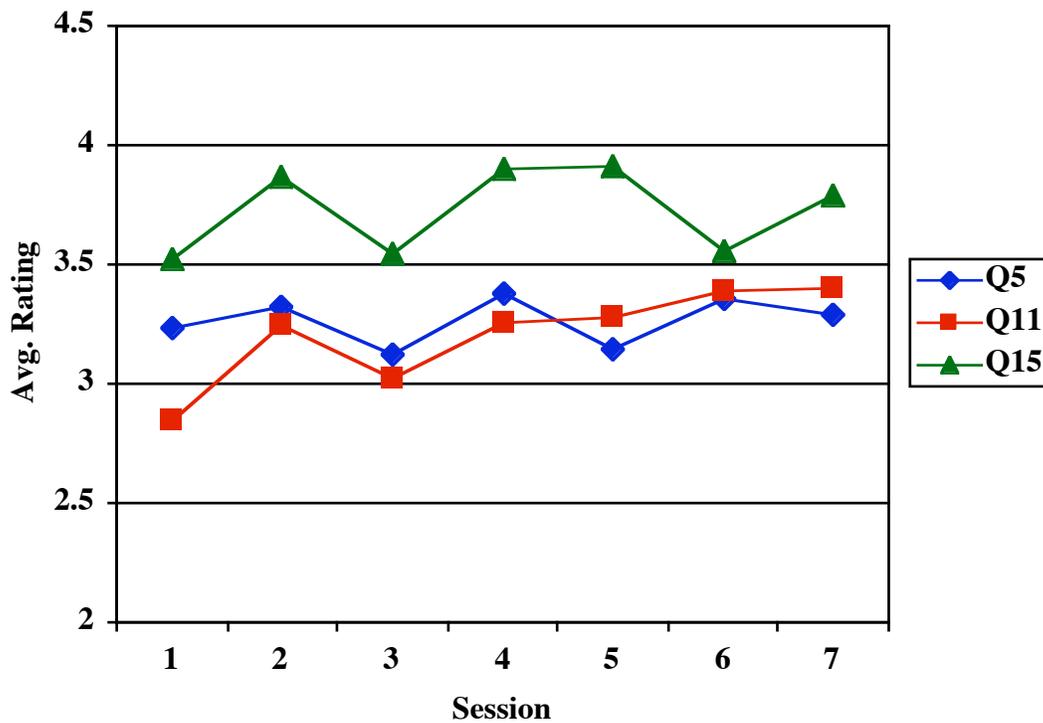


Figure 2. Average ratings across sessions that did not differ significantly.

The ratings remained relatively neutral for Fair Selection (item 5) reflecting some comments received that the random selection process is not seen as fair or that some people do not understand the selection process. With the exception of a few wild cards, selection for review is random and is not based on likelihood of any person’s promotion. This explanation started being addressed in training for Session 6. For item 11, there is indication that the RDCP is an improved *classification* process although from the comments, some people weren’t sure what this question meant in that they either didn’t know what “classification” meant or what the previous process was. The consistently higher ratings for Item 15 indicate that respondents tend to agree with the panel decisions.

Conclusions

The RDCP is a peer review process to determine the appropriate grade level for person-in-the-job positions. Seven sessions have been conducted to date (starting in August 2001), reviewing a total of 520 employees in about 54 branches across 58 panels involving a total of 384 employees as panel members. The process has resulted in 199 employees’ jobs classified at their current grade, 269 classified at the next highest grade, two classified below grade, with the remainder to be reviewed again due to either insufficient information or appropriate Guide not applied. This paper described the results

of a survey conducted with participants of the seventh RDCP session and compared it with results of previous surveys.

The survey responses indicate increasingly greater understanding and satisfaction among RDCP participants. However, future changes will address improved training the criteria for classification and the purpose of RDCP. Efforts will continue to ensure as much consistency as possible among the peer groups and across the RDCP sessions.

APPENDIX A

Research and Classification Process Questionnaire

In order to improve the Research and Development Classification Process, feedback from all the participants is critical, whether you are a reviewee, a panel member, or a Branch Head. The survey below was designed to gather that feedback yet be quick and easy to do. While your participation in this survey is completely voluntary, your response would help form a more accurate picture of how the RDCP is progressing. Your responses are completely anonymous. The data will be analyzed and presented as representative of the entire sample, such as ranges, averages, variances, and percentages. This survey will close January 28 at 5:00pm. The results, but not the data, of the survey will be made available to all RDCP participants and will be posted on the RDCP website: <http://ohr.larc.nasa.gov/RDCP.html>. This survey, or one similar to it, will be repeated for each Session. Please respond to all items by clicking on the appropriate answer or by typing in the information requested. If you have participated in the RDCP in more than one role, such as a reviewee one session and a panel member another session, please fill out the survey twice, once for each role. Thank you for your help in improving the RDCP!

Section I

1. In which Session did you participate in the RDCP?
(the Session number is automatically entered)
2. Please indicate which Guide you used for the RDCP.
Research Grade Evaluation Guide
Equipment Development Grade Evaluation Guide
Other
3. Please estimate the amount of time, in hours, you spent working on the RDCP.
4. Please indicate your participant role.
Branch Head/Supervisor
Panel Member
Reviewee

Section II

Scale (0=No Opinion or Don't Know, 1=Strongly Disagree, 2=Disagree, 3=Neither Disagree nor Agree, 4=Agree, 5=Strongly Agree):

5. The method used to select the Session for a person's review is fair to most RDCP AST researchers and developers :
6. Your RDCP training was adequate :
7. The RDCP Handbook was adequate :
8. The RDCP process is understandable :

9. The RDCP process provides clear criteria for classification of job duties :
10. The RDCP process is conducted consistently for most researchers, to your knowledge
11. The RDCP process is an improvement over the old classification process
12. The RDCP process is an improvement over the old promotion process :
13. Your morale has improved due to implementation of the RDCP process :
14. You were allowed adequate time to work on the RDCP :
15. You agree with the panel's decision(s) (regardless of role):
16. The panel evaluation report was adequate to explain the scores received:

17. If you were a reviewee, please indicate the panel's decision.
 - Above Grade
 - At Grade
 - Below Grade
 - Other

18. Please provide any general comments or explanations of above responses here.

APPENDIX B

Summary of RDCP Survey Comments from Session 7 RDCP Participants

Fifteen pages of text comments were received as part of the 63 survey responses. Many respondents made one or more comments. The comments seemed to cover both ends of the same spectra, that is, for every point someone made a negative comment about, at least one or more positive comment was made, and vice versa. Some of the comments are general dissatisfaction with having a RDCP type process versus a different system. However, several comments were about the RDCP itself. Most of the comments were of the same general categories as those from the earlier sessions.

Some general themes in the comments include the following: There are concerns with consistency in applying the evaluation criteria across sessions and panels and that interpretation of the criteria are too subjective. This related to comments about training as well. More definitions of the criteria are desired. The time involved in both preparation and evaluation is thought to be too great. Also, some people think Branch Heads should play all or more of a part in conducting the evaluations. However, others think that Branch Heads do not have the knowledge about the research or the individuals to be able to do this adequately. More attention to providing correct, but succinct, information in the reviewee packages was mentioned. Diversity of panel members was expressed as a good characteristic. Some respondents were concerned that panel members' personal opinions of reviewees affected evaluations while others thought the panels were very impartial and thorough. Concerns were expressed about Branch Heads and reviewees not understanding the purpose of the RDCP evaluation reports. That is, some respondents commented that they expected panel evaluation reports to provide feedback on what to do to get a promotion if a promotion was not received. (*Note: this is not the purpose of the RDCP reports. The reports are to document why the assigned scores were given, rather than what to do to receive other scores, such as those necessary for a promotion. In effect, this would be asking the panel to conduct an additional evaluation for each person.*) Some people never received their evaluation reports from their branch heads. In general, for a variety of reasons, some people thought RDCP was a good idea and some didn't.

Below is a listing representative of all the comments received. (The RDCP Advisory Committee received a copy of the complete, unedited comments.) Similar comments were received regardless of role of participant. Some of these concerns have already been addressed as of this writing, but plans are being made to address as many more as possible.

General –

- RDCP has really boosted morale for the many deserving people who would never have been rewarded under the old system.
- The RDCP process has had a negative impact on my work and future goals at Langley. See too many people being promoted that do not deserve it.
- Researchers need to be able to openly express their honest technical opinions without fear of retribution, whether from management or coworkers.

- RDCP is SIGNIFICANTLY BETTER than the old way, and must be kept at all costs. Everyone gets a "turn at bat" regularly, and it eliminates the "smoky back room" promotion meetings
- A "50%" promotion rate may be too high, but this result is far better than the historical promotion rates which were meager and handed out in an incomprehensible manner. Clearly a large number of people have been working below grade for a long time because of the old process.
- After the first cycle is complete, the entire process will smooth out, the promotion rate will stabilize, and Langley will have a reliable system for the future.
- Employees previously made decisions about job activities based on what was best for the branch, Center, and NASA. Now seems that employees make decisions based on whether or not the activity will reflect well in the RDCP process.
- The RDCP process is one the most miserable duties I have been called upon to perform at this Center.
- RDCP should be fair to everyone who was part of the original process and should not change session to session. If it needs to change, do so after the 9 sessions are reviewed after everyone gets a chance to participate under the same rules and fairness as those in session 1.
- Although this was a significant burden, I realize the importance of the process and the value by peer review.
- My morale is not improved because I still see this process as being a game, just with different rules.

Managerial Responsibility-

- Fewer and fewer supervisors are technically competent in the areas they supervise (and thus can be easily misled by inflated write-ups).
- The Branch Head is best suited for spending the time and resources for determining a person's status relative to the research process
- Branch Heads need to do a better job reviewing employee packages.
- As a reviewee, I didn't get the evaluation report from my branch head.
- The branch heads should be intimately involved in the initial definition of Factors 1 and 2 to assure the proper prospective and relevance of work and supervision is clearly stated.
- Those involved in research need to remain focused and not be submitted to reviewing their peers.
- The center upper management needs to evaluate the actual cost of this process and determine if the center can even afford it.
- Committees should be made up of 1) branch head, 2) reviewee's program manager(s), 3) a competency rep, 4) a permanent center rep, and 5) an at-large rep.
- It seems that the RDCP tries to eliminate or improve the cases of unfair treatment of the employees by their immediate supervisors. If this is the case, then one has to try to address the cause of the problem, rather than delegating the supervisor's responsibilities to the employees.

Time –

- Considerable amount of time to do the IDRs and be very thorough.

- Shorter packages desired to save time for everyone.
- Process takes considerable time

Consistency and Quality–

- Reviewee packages should not copy the exact wording in the guides.
- Outcome of the review process is highly dependent upon the peer group one is placed in.
- Notice to participate in this RDCP survey came out two months after the panel meeting, which is too long to wait to give feedback.
- Some peer groups are getting too small, to the point of getting incestuous.
- Having the RDCP manager and Human resources representative sit in on deliberation for all panels makes me feel like panels are conducted as consistently as possible.
- In several cases, it appeared that the employee embellished their accomplishments and work assignment or provided incomplete detail.
- Factor II is very difficult to grade.
- There still seems to be inconsistent scoring across the various panels, although there have been more "liberal" scoring panels than "conservative" ones.

Training–

- Allow branch heads to watch multiple panels in action, even if the panels are not the ones in which his or her personnel are evaluated. (*Note: when previously asked, panels were not comfortable with this idea.*)
- The panel was not trained adequately
- Branch heads interviewed had misconceptions about the RDCP process and how it works.
- Training should be extended to discuss the guide criteria more thoroughly.
- Supervisors need to participate in a mock RDCP panel in order to better understand the process. (*Note: A tape of this is already available.*)

Process

- Would be good to institute a policy that the IDR must speak to the branch head of the person being reviewed in person (rather than over the phone).
- The brief written evaluation presented to the supervisor cannot possibly explain the dynamics that occurred within the panel to lead to the resulting decision. A decision that may seem like a "no-brainer" on reading the write-up can be completely turned about as a result of the IDR interviews (often rightfully so).
- Simplify the package so that it is better than old style "one pager" but not the "life time essay" as it is now. A middle road may be less painful.
- Reports too formal or unhelpful. Possible remedy would be for the IDRs or Panel Chairmen to debrief the reviewee's Branch Head.
- Evaluation report was worthless. Provided a glowing (and accurate) description in each area but provided no information on what should be done differently to achieve a higher grade, no information on what might be missing, no information useful in preparing for the next round of evaluations.

- A panel member talked to people outside the process about what was said in the interviews and it was relayed to the reviewee, which was very disturbing. *(Note: If anyone ever has this happen, please notify the RDCP Manager. This is expressly forbidden!)*
- The review package format is VERY POOR! It should be restructured to map to the factors (i.e. the reviewee should have a separate part of the write up package to support each factor under their part of the guide).
- The EDGEG's text does not relate strongly enough to the work we do at LaRC. In many cases you REALLY have to stretch the text to get it to apply to what LaRC does.
- Since the whole panel process can be overturned by an appeal, where only one person, a "subject matter expert", makes the decision, eliminate the panels and just assess using these single reviewers.
- Frustrated that there is no more delineation between what constitutes a "B" or "D" in scoring (just above "A" but just shy of "C", etc.). Scores like "B" and "D" cover a lot of ground.
- Some panels represent several "disjointed" disciplines. It was a struggle for panel members to understand the significance of a certain exceptional "achievement" or "contribution" of a reviewee. At the other extreme, a panel covering a narrow discipline and small number of employee under the panel could have the dynamics of a "self-perpetuating institution" such that any contribution would be considered "great" !
- Those who chose to defer should get put after all those who were originally in session 9 rather than put in front of others originally assigned to a session.
- The panel was fair and accurate and the decisions were based on merit with significant discussion and consideration.
- How are people selected to serve on a panel?
- The makeup of the panel was intentionally diverse which both brought a level of differing, dispassionate perspective and an intimate knowledge of the individuals and their work to fill in informational gaps on the spot.
- For a reviewer, and especially the panel chair, please define expectations and duties of these positions in the first email informing the panel members that they have been selected to serve on a panel.
- It helps the impartiality of the process to have outsiders to the Peer Group as panel members.
- Would be good to have an understanding for making decisions about wild card nominations. People who receive "early review" recommendation have little chance of actually being re-reviewed in less than a normal cycle's time if they have to be a Competency's one wild card.
- The panel report is too "formal" to provide the branch head with adequate feedback on why decisions were made.
- Panel members should be allowed to communicate the discussion of the panel to their branch head regarding both general process (already allowed) and but also those specifically relating to any reviewee (although comments not attributed to any individual).