

Instructor Guide

CEA Curriculum















Table of Contents

ntroduction	3
About Align	3
About this Instructor Guide	3
1.1 Introduction to Align Training	6
1.2 Navigating the System	9
1.3 Creating a Finding	11
1.4 Updating a Finding	14
1.5 Preliminary Screening	16
1.6 Performing a PNC Review	18
1.7 Linking a PNC to an Enforcement Action	20
1. 8 Sending RFIs from the PNCR Form	22
1.9 Data Flow and Enforcement Processing	23
1.10 Assigning an EA to a New Disposition	25
1.11 Assigning an EA to a Settlement or Dismissal	27
1.12 Deleting a Disposition/Relating an EA to an Existing Disposition	29
1.13 Sending Notifications for Dispositions	31
1.14 Sending Notifications for NAVAPS Dispositions	33
1.15 Submitting Dispositions for NERC Review	35
1.16 Closing Dispositions	38
2.0 Introduction to Mitigation Management in Align	40
2.1 Mitigation Management: Review and Processing	42
2.3 Mitigations: Extensions, Requests, Verification	44
2.4 Consolidated Mitigations	46
2.5 CMFP Activity Search & Entity Information	48

Introduction

Historically, the regions have tracked compliance and enforcement activities in different ways. We have used slightly different terms that needed to be translated as well as slightly different processes. The ERO Enterprise needed a central hub that harmonizes these processes, declares a single language, and tracks that data in a universal tool.

About Align

Align is the realization of such a tool –the mechanism to support the grand vision of a single business process shared across our industry that tracks compliance data through a central hub. This central hub integrates Cores registration data with compliance monitoring and enforcement activities.

Align will be the ERO's system of record for every compliance and enforcement activity; but only a portion of that function will be going live in this first release. The remaining functions will be added progressively through future releases until all functions are available. The focus of release 1 is the life cycles of self-logs and self-reports but there are interim ways to handle other kinds of findings as well.

About this Instructor Guide

This guide is comprised of 21 modules that focus on the use of the Align software platform for CMEP-related tasks. It is best implemented alongside the supplemental use of the Align video series as well as the Align User Reference Guide (URG) for CEAs.

The curriculum should be implemented in a webinar setting with a two-three person instructor team facilitating. The team should ideally include a lead instructor with a two or three person instructor team assisting with the processing and evaluation of learners' practice exercises.

The curriculum should take about 3.5 - 4 hours to deliver. Although the modules are loosely sequenced according to the order of the CMEP process flow, you are welcome to make adjustments based on learner needs or instructional circumstances. For example, practicing how to "Close Dispositions)" (module 1.16) is sequenced to be implemented before delving into the management of mitigation entries (module 2.0). In order for learners to practice CEA tasks in mitigation management, the facilitators must have the opportunity to access the system in the Entity and NERC roles and submit mitigation activities for the CEAs to review. Time and instructor support permitting, the instructor may opt to implement the mitigation management modules before the "Closing Dispositions" one so as to follow a more organic sequence. Or, he or she may decide to skip one of the modules altogether if the learners display adequate proficiency in their ability to carry out the functions.

This Instructor Guide is designed to be as user-friendly as possible with color coding and easy to identify icons. Each module is further divided into mini segments in which instructors present new information, engage learners in discussion, and facilitate hands-on practice exercises.

Standard module components

At the top of each module is a session organizer that includes the following:



The approximate **time** it takes to implement all activities of the module.

Objective: The learning target or goal of the module.



The resources that the **learner needs** in order to successfully participate in the module



The resources that the **facilitator needs** in order to successfully implement the module.

Pre-requisite: Where applicable, the pre- qualifications for learning the module.

Module Overview: A summary description of each segment of the module.

Preparation: What the facilitator needs to do or have in preparation for implementing the

module.

Each module includes:

• Left-aligning text boxes with instructions regarding the segment's activity, with the suggested duration in parenthesis.

- Right-aligning text boxes with a picture of the visual that is to be shared on the presentation screen during the segment.
- Two shaded segments at the bottom of each module that represent the end of the module during which the facilitator is expected to provide a summary/review of the module and to give learners the opportunity to ask questions or seek clarification. Facilitators are also asked to provide a brief forecast of the next module's topic during this time.

<u>Please Note</u>: All content written in *Italics* represent examples of suggested information to share or issues to discuss. The facilitator is expected to adjust or replace these narratives with their preferred verbiage in order to facilitate the real-time flow of the learning session.

The icons used in this guide include:



Materials and resources for training

Learners Need	Facilitators Need
User Reference Guide	 Pdf Presentation
 Align Video training series 	 User Resource guide to be used for presentation
 Align software platform (CEA access) 	 Virtual learning polling software
	 Align Video training series
	 Align software platform (Registered Entity;
	Regional Entity, and NERC access)

Miscellaneous facilitation tips

<u>Breaks</u>: Breaks are optional. Determine when to break ahead of the class. Virtual (synchronous) learning sessions are more effective when implemented in chunks that match people's average learner attention span. Preferably, virtual learning segments should not exceed 30-45 minutes without a break.

The timing of your breaks may also be determined by the need to check learner work or update learner entries. In order to facilitate the opportunity for learners to practice all phases of the self-reporting life cycle, it is necessary for the facilitators to access the system in the Entity and NERC roles and respond to learner entries to advance them to the next stage.

<u>Repetition for reinforcement</u>: Since this training is on the functionality of a software, learners are likely to encounter some repetitive actions such as the need to save every form before exiting a function. When users close a form without saving, they will lose the information entered. Reminding learners to be sure to either save a form by clicking the "save" button or submit it using the "save and action" button may sound redundant. However, it serves to reinforce this critical concept in their minds.

<u>Discussions:</u> The provision of adequate wait time after questions asked by you or another learner is important. Pausing for 7-10 seconds before talking gives learners time to digest the question asked.

<u>Application Exercises</u>: Since participants are likely to include learners with varying degrees of auditory or visual learning preference, it is advisable to read aloud and explain application exercises to ensure understanding.

<u>Virtual learning apps to check for understanding</u>: Prepare to set up and run a live poll on WebEx, Slido or whichever polling app you choose to use. Prepare to explain the virtual learning tools to be used during the training such as chat, raising hands etc.

<u>Demonstrations</u>: It is advisable to consciously describe or explain each step you undertake during a demonstration. Since the focus of the training is on the funtionality of the software rather than the quality of content entered into the system, feel free to use nonsensical information when demonstrating a function. This will serve to save time and facilitate advancement through the training modules.

1.1 Introduction to Align Training



9-10 minutes

Objective: Describe the CMEP process flow at a high level and log into the Align system.



Learner needs:

- Process flow exercise 1.0
- Align Training Environment
- User Resource Guide pg. 2-3



<u>Facilitator needs</u>:

- Practice exercise 1.0
- CEA Process flow
- User Resource Guide pg. 2-3
- Application Exercise 1.1
- URG Process flow pg. 4
- Structure of training summary

Pre-requisite: ERO portal account, if possible

Module Overview

- A. Welcome and Introduction
- **B.** Administer introductory exercise Overview of Align- discuss the scope of release 1
- **C.** Briefly discuss overview of Align software
- D. Learners practice accessing Align
- E. Discuss the scope and structure of this training
- F. Summary and Review
- **G.** Questions and forecast

Preparation:

- Review module contents
- Watch video #0 (Introduction to Align)
- Plan solutions for log-in issues
- Review italicized content and adjust as desired



A. Welcome and Introduction

1. Welcome participants to learning event and introduce facilitators [0.5mins].



B. Introductory exercise on CME Process

2. Show practice exercise (#0) and ask learners to order the five (5) high level steps of the compliance monitoring and enforcement process shown on the practice sheet by entering the appropriate position number for each [1.5min].



3. Show CEA process flow and discuss the overall CMEP process for CEA personnel [1.0min].

You or a registered entity will create a finding in ALIGN, and you will screen it to make sure that is not a duplicate of another finding already reported. If it is not a duplicate, you will review the scope and risk of the issue, evaluate enforcement options and decide on the appropriate disposition based on the facts and circumstances of the violation – the disposition will be either a dismissal, Compliance Exception, Find Fix and Track, Settlement or Confirmed Violation.

Each disposition other than a dismissal will include mitigating activities or Mitigation plans, and Align will also track obligations for settlement and confirmed violations.

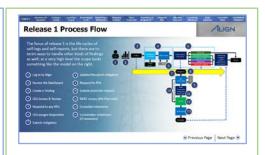




C. Overview of Align

4. Show User Resource Guide (URG pg. 4). Introduce Align, and discuss the scope of release one [0.5min].

Align is a software tool –the mechanism to support a single business process that tracks compliance data through a central hub. That central hub integrates CORES registration data with compliance monitoring and enforcement activities. Historically, the regions have tracked compliance and enforcement activities in different ways that needed to be reconciled together. Align harmonizes those processes, using a single language and tracks that data in a universal tool. Align will be the ERO's system of record for every compliance and enforcement activity; but only a portion of that function will be going live in this first release. The remaining functions will be added progressively through future releases until all functions are available. The platform will replace all current methods of creating self-logs and self-reports. Self-logs and self-reports will no longer be submitted through WebCDMS or CITS. These items will be added directly into Align, rather than adding them into a spreadsheet and submitting those on a periodic basis.





D. Practice logging into Align

5. Show Application Exercise 1.1 (Accessing Align); Ask learners to follow the steps on their URG pg. 3 to log into the system with their <u>username</u> and <u>password</u>. [1.0min]





E. Scope and Structure of training

6. Show URG pg. 4 (Process flow) and discuss scope of training [0.5min].

This training will focus on release one, which includes the life cycles of self-logs and self-reports. We will familiarize ourselves with the features of Align by using this high-level process flow as well as the User Resource Guide (URG) to practice the major functions of the system.



7. Show structure of training – Align learning resources. Introduce the resources and materials learners will need during the training [1.0min].

<u>Learning resources</u>: Besides the present training, Align training offers a multi modal approach that includes (1) a User resource guide – for use during training and as an 'on the job' resource; (2) Videos – limited use during training and as an 'on the job' resource. Learners will have the opportunity to practice all functions on the live system.



8. Show structure of training – Training session structure. Explain the modularized structure of the training; the hands-on approach to practicing the functions of Align, and details regarding scheduled breaks. Briefly explain how to use the features of the live training medium (e.g. WebEx Training) being used for the learning module. Demonstrate the use of functions such as Chat feature, polling, raising hands for questions etc. [1.5min].

Our goal is to have the opportunity to practice the appropriate entry of information into the Align platform for all tasks related to the self-logging/self-report cycle.

<u>Nonsensical data</u>: Because the focus of this training is on the mechanics regarding the use of the platform rather than the quality of information entered, you are welcome to enter 'nonsensical' data into the form fields with which we will be practicing. This will help facilitate the flow of our training module without much delay.

Breaks: Explain the schedule for breaks.

This training is broken into 12 modules, each lasting between 8-10 minutes, with a couple lasting shorter or longer. We plan to take "x" minute break after modules {x y,z}.





F. Summary and Review

9. Review objective; summarize 1-2 points to remember from module [1.0min].

Aside from being familiar with the overall function of Align, you should now be able to log into the system as a user. To review the steps on how to access the system, see URG pg. 2-3 (logging into Align).



G. Questions and Forecast

10. Invite questions and briefly describe next module's topic [0.5min].

We will begin by familiarizing ourselves with the features of the Align dashboard and the basic principles of navigating the system



Optional Break

11. You may use this time to resolve any login issues that participants may have experienced.

1.2 Navigating the System



8-10 minutes

Objective:

Describe the main features of the Dashboard; navigate to different sections of the platform



Learner needs:

- Align Training Environment
- User Resource Guide pg. 5-8



Facilitator needs:

- Align Training Environment (Dashboard)
- Poll 1

Pre-requisite:

Module Overview

- A. Discuss features of the Dashboard
- B. Demonstrate functions of the Dashboard
- C. Learners practice navigating the Dashboard
- D. Summary and Review
- E. Questions and forecast

Preparation:

- Review module contents
- Use URG (pg. 5-8) to practice functions of the dashboard such as how to change views
- Build Poll 1 into presentation (e.g. WebEx poll).
- Review italicized content and adjust as desired



A. Identify and discuss features of the Dashboard

 Show Align solutions web page (Dashboard). Point out and describe the following sections: (a) Items awaiting my review; (b) Current Activity [1.5min].

The Dashboard contains a snap shot of any actionable items that you have and a visual breakdown of how many items you have in the review process.

Items awaiting my Review: Anything awaiting on your review appears in the "Items Awaiting my Review" section. Items that appear in this section include: RFI responses that have come back for mitigations; RFI responses that have come back for PNCs; Notification responses; Finding updates, and milestone extension requests. It is important to note that when items appear on the My Align Dashboard, the date of submittal is not visible. The only date you will see is the due date if applicable.

<u>Current Activity</u>: The "Current Activity" section shows the number of items you have to review.





B. Demonstrate the functions of the Dashboard

2. Still showing the Align solutions web page (Dashboard), demonstrate how to open and close a task (URG pg. 5), then demonstrate the following: how to sort and filter tables in Align to find the item you are looking for (URG pg. 6); how to export table data from Align (URG pg. 7), and how to navigate to each of the different views, explaining the functions of each view. [2.0mins].





C. Practice Navigating the Dashboard

- 3. Ask leaners to spend a couple of minutes on their Align web page reviewing the parts and functions of the dashboard [2.0mins]
- 4. Administer Poll 1 [3.0mins]



Poll 1.2 Questions include:

- To open and review items awaiting my response such as milestone extension requests I need to look in: [a items awaiting my review; b- Current activity; c- CMEP Activity Search; d Entity Information view;]
- To get a snapshot of the number of items awaiting my review I need to look in: [a items awaiting my review; **b**-**Current activity**; c- CMEP Activity Search; d Entity Information view;]
- To create a finding, I must navigate to: [a- Current activity; **b -Compliance monitoring view**; c- PNC Processing view; d-Mitigation management view]
- To screen and review potential non-compliances (PNCs), I need navigate to: [a -Compliance monitoring view; b-PNC Processing view; c- Enforcement processing view; d Entity Information view]
- To review and verify mitigating activities I need to navigate to: [a -Compliance monitoring view; b- PNC Processing view; c- Enforcement processing view; d-Mitigation management view]
- To view coordinated oversight group details, I need to navigate to:[a Current activity; b- PNC Processing view;
 c Entity Information view; d the Reporting Section]



D. Summary and Review

3. Review correct responses to poll questions with demonstration on dashboard if necessary [1:0min]. To review the steps on how to navigate the Dashboard, see URG pg. 5-8



E. Questions and Forecast

5. Invite questions and briefly describe next module's topic [0.5min].

In the next module, we will focus on how to create a finding in Align.



1.3 Creating a Finding



11-12 minutes

Objective: Create and submit a finding



Learner needs:

- User reference guide pg. 9-21
- Align Training Environment (Compliance Monitoring View)



Facilitator needs:

- Process flow step 3
- Application Exercise 2.3
- Align Training Environment (Compliance Monitoring view)
- WebEx Poll 2

Pre-requisite:

Module Overview

- A. Identify the creation of a finding on the process flow
- B. Learners practice how to create a finding
- C. Demonstrate how to create a finding
- D. Check for Understanding
- E. Summary and Review
- F. Questions and Forecast

Preparation:

- Review module contents
- Watch video #3, 4, and 5 (Changes to self-reports and self-logs, Creating a Finding, and additional items on the Entity's findings)
- Build Poll 2 (e.g. WebEx poll).
- Use URG to practice creating a finding
- Review italicized content and adjust as desired



A. Identify the creation of self-reports on the process flow

1. Show Process flow step 3 (create a finding); Identify the Creating a Finding step on the process flow; State objective; let learners know what they need for this module [0.5min].





B. Practice how to create a finding

2. Show Application Exercise 1.3: Ask learners to pull up Align webpage, navigate to Compliance Monitoring view and follow the steps on URG pgs. 9-21 to "create and submit a finding." Once created, ask learners to identify their finding and write down unique ID to help them identify their finding among others during the rest of the training module [5.0min].





C. Demonstrate how to create a finding

3. Show Align Training Environment (Compliance Monitoring view): demonstrate how to create a finding, identifying key points for learners to remember [3:0min].



Note: The "create a finding" form is very similar to what the registered entity sees when they create a self report or self-log with a couple notable exceptions. One exception is the field at the top called monitoring method. As the CEA, you have the option to create any kind of finding that you need to whereas your entities can only select between self-report and self-log, and they would have already selected that before they saw this screen.

Note: The field for adding additional regional jurisdictions relevant to your report is a little different when the entity is in Coordinated Oversight. In this case, the language will say "Additional Coordinated Oversight Registrations Impacted."

Note: When you select the Submit action on the form and then hit the Submit and Action button, you'll notice that we get a whole bunch of errors. These indicate the required fields on the form – which is most of them.

Note: The help text in the form, denoted by the little question marks, is particularly robust in helping you fill the form appropriately, so please do use that as needed.

Note: The CEA form does not have the evidence and attachments section that the Entity form has. In the Entity form, this section gives the entity the reference number to use when uploading items into the data locker. Just below that is a section for your entity to add any mitigation milestones if they have them ready at the time of submitting the finding.

Note: The entity has the option to submit both the finding when submitting a finding. If they do not, their mitigation will not be submitted but rather be saved as a draft for the entity to update later.



D. Check for understanding

4. Administer poll 2; monitor poll responses; review correct answers, using live platform to demonstrate if necessary [1.5min]



Poll includes:

- **True**/False. Entities can only create findings as a self-report or self-log, while as a CEA, you can base your finding on other methods of monitoring such as audit, investigation, self-report, or spot check.
- True/False. During submission, the 'create a finding' form validates the 'return to compliance' date
- **True**/False. If the region indicates that the non-compliance is no longer occurring, the form validation does not check that a date has been included in the 'return to compliance' date field.
- True/False. The entity will be able to see all the information that you input into the finding form.
- **True**/False. Align will reject your report and display an error if you enter a date in a format other than DD/MM/YYYY
- True/False. Align will accept your report even when you submit with "no action"
- True/False. Align will reject your report and display an error if any required field on the form is left blank



E. Summary and Review

7. Review objective; summarize 1-2 points to remember from module [1:0min].

Hopefully, you're now more comfortable with the process of creating a finding.

To review the steps on how to create a finding, see URG pg. 9-21 and Video # 4 (Creating a finding)



F. Questions and Forecast

8. Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will look at handling finding updates from the entity.



Optional Break

7. You could use this time to access Align in the role of an Entity to create and submit findings for each CEA in your training session to practice with. Then, submit an update for each of these findings. In addition, create and submit a separate finding, (as an Entity) to use in this modules demonstration section. Next, create and submit an update on the finding.

Determine how you will assign each CEA in the training session with the unique ID for the finding you submitted for their review as a registered entity (email, WebEx chat, verbal communication during the session etc.).

1.4 Updating a Finding



6-7 minutes

Objective: Respond to a Finding Update



Learner needs:

- User Reference Guide (URG pg. 22-25)
- Align Training Environment (My Align/Dashboard View)



Facilitator needs:

- Process flow step 4
- Application Exercise 1.4
- Align Training Environment (My Align/Dashboard View)

Pre-requisite: Module 1.3

Module Overview

- A. Introduce the need to respond to finding updates
- B. Demonstrate how to update finding updates
- C. Learners practice how to update finding updates
- D. Summary and Review
- E. Questions and forecast

Preparation:

- Review module contents
- Watch video #6 (Responding to self-report updates)
- Create and submit finding and finding updates for each learner in the session to practice with
- Submit a finding and an update to demonstrate with
- Review italicized content and adjust as desired
- Determine how to assign learners their findings (e.g. WebEx chat, email etc.)



A. Responding to a Finding Update

 Show process flow. Assign each CEA in the training session with the unique ID for the finding you submitted for their review as a registered entity [0.5mins]





B. Demonstrate how to respond to finding updates

2. Show Align Solutions Web page (My Align Dashboard). Demonstrate how to respond to an update submitted by a registered entity (URG pg. 23-25). Walk learners through the process of determining whether the update constitutes an addition to the existing finding or is an entirely separate PNC. Walk learners through the process of updating the Entity's previously submitted finding with the information from the update [3.0mins].

If your entity needs to add information to a self-report after they have submitted it, they'll send you a Finding Update that will appear on your list of items awaiting review on the My Align screen. Entities can send updates up to the point when you either decide on a disposition for the PNC or determine that it fails the preliminary screen. Your main task here is to determine if this updated information really does belong to the same self-report or if it constitutes a separate PNC. If it is a separate PNC, you'll need to contact the entity and ask them to create a separate self-report. If the update belongs with the original self-report, you'll need to add that information on your end since the entity cannot edit after submitting.





C. Practice responding to a finding update

3. Show Application Exercise 1.4. Ask learners to pull up Align webpage, navigate to My Align Dashboard and follow steps on URG pgs. 25-28 to respond to the finding update assigned to them. [2.0mins].





D. Summary and Review

4. Review objective; summarize 1-2 points to remember from module [0.5min].

To review the steps on how to update a finding, see URG pg. 19-22 and video # 6 (Responding to Self-Report Updates)



E. Questions and Forecast

5. Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will practice the preliminary screening process.



1.5 Preliminary Screening



8-10 minutes

Objective: Perform the preliminary screening process by screening and passing a new finding



Learner needs:

- User Reference Guide (URG pg. 26-29)
- Align Training Environment (Preliminary screening View)



Facilitator needs:

- Process flow step 4
- Application Exercise 2.5
- Align Training Environment (Preliminary screening View)

Pre-requisite: Module 1.4

Module Overview

- A. Introduce Preliminary Screening
- B. Demonstrate how to perform a screen
- C. Learners practice how to screen a finding
- D. Summary and Review
- E. Questions and Forecast

Preparation:

- Review module contents
- Watch video #7 (Preliminary Screening)
- Use the URG to practice screening process
- Review italicized content and adjust as desired



A. Introducing Preliminary Screening

 Show Process flow step 4 (preliminary screening and PNC Review): State the objective; Discuss the 3 main confirmations one needs to make at this stage (URG pg. 26); let learners know what they need for this module [1.5mins].





B. Demonstrate how to screen a finding

2. Show Align solutions page (PNC Processing) Demonstrate how to carry out the preliminary screening process. Walk learners through the processes of assigning the finding to a team member, checking for duplicates, and completing the screening with a pass or fail. [2.0mins] In this process you are technically checking for three things: 1) that the entity is registered in your jurisdiction, 2) the standard and requirement they are reporting on is applicable to their function and 3) the report is not a duplicate of another PNC already reported.

Duplicate reports may happen if, for example, two different people at an entity accidentally both report on the same PNC.

Only when there are multiple findings for the same standard and requirement for the same entity do you have to do the manual work of analyzing each finding to make sure they are not describing the same PNC that you are screening.





C. Practice screening a finding

4. Show Application Exercise 1.5. Ask learners to pull up the Align webpage, navigate to preliminary screening view and follow steps on URG pg. 27-29 to run a preliminary screen on the practice finding assigned to them in module 2.4 [3.0mins].





D. Summary and Review

5. Review objective; summarize 1-2 points to remember from module [0.5min].

To review the steps on how to screen a finding, see URG pg. 26-29 and video #7 (Preliminary Screening)



E. Questions and Forecast

6. Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will practice performing a PNC Review.



1.6 Performing a PNC Review



7-8 minutes

Objective: Complete a PNC Review



Learner needs:

- User Response Guide (URG pg. 30-40)
- Align Training Environment (PNC Processing)



Facilitator needs:

- Process flow step 4
- Align Training Environment (PNC Processing)
- Application Exercise 2.6

Pre-requisite: Module 1.3

Module Overview

- A. Identify the PNC Review stage on the process flow
- B. Learners practice how to complete a PNC review
- C. Demonstrate how to complete a PNC review
- D. Summary and Review
- E. Questions and Forecast

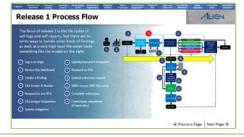
Preparation:

- Review module contents
- Watch video #8 (PNC Review)
- Use URG to practice completing a PNCR
- Review italicized content and adjust as desired



A. Introduce the PNC Review

1. Show process step #4; Identify the PNC Review step on the process flow; State objective; let learners know what they need for this module [0.5mins].





B. Practice completing PNCRs

2. Show Application Exercise 1.6: Ask learners to pull up Align webpage, navigate to PNC processing view and follow the steps on URG pgs. 30-40 to complete a PNC review for their assigned finding [3.0mins].





C. Demonstrate how to complete a PNCR

3. Show Align Solutions PNC processing view: demonstrate how to complete a PNC review, identifying key points for learners to remember [3:00min].

Note: Assigning the PNCR to another CEA removes your ability to edit the form. To regain access, you will need to contact the CEA you assigned to the PNC and have them assign it back to you.

Note: On the PNC form, the only thing Alian validates is that hoxes are

Note: On the PNC form, the only thing Align validates is that boxes are checked in the Extent of Condition Review section, the Root Cause Analysis section, and the Risk Analysis section. You should not hit the Save and Action button until you complete the full form.

Note: When you check the Root Cause Analysis section as complete, the Root Cause text field that you do not want to share with the Registered Entity.

Note: The comments section is editable, so be careful not to delete any comments that you want to keep as a part of the record. It would be a good practice to add the date and user name when you add a comment.





D. Summary and Review

4. Review objective; summarize 1-2 points to remember from module [0.5min].



E. Questions and Forecast

5. Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will practice linking PNCs to existing Enforcement Actions.



1.7 Linking a PNC to an Enforcement Action



7-8 minutes

Objective: Link and unlink PNC to existing enforcement action



<u>Learner needs:</u>

Align Training Environment (PNC Processing)



Facilitator needs:

- Align Training Environment (PNC Processing)
- Application Exercise 1.7
- Video #10: Linking a PNC to an Existing Enforcement Action;
- Pre-existing Enforcement Action records in Align

Pre-requisite: Module 1.6

Module Overview

- A. Linking a PNC to an Enforcement Action
- B. Demonstrate how to link a PNC record to an EA
- C. Practice linking a PNC to an EA
- D. Summary and Review
- E. Questions and Forecast

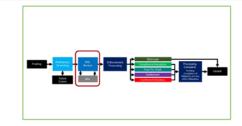
Preparation:

- Review module contents
- View Video #10 to practice: Linking and unlinking a PNC to an Existing Enforcement Action;
- Review italicized content and adjust as desired
- Ensure learners will have access to pre-existing enforcement action records to which they can link and unlink their existing PNC record



B. Linking a PNC to an Enforcement Action

1. Show process flow. State objective. Let learners know what they need for this module. Briefly discuss 1-2 situations in which one may need to link a PNC record to an existing Enforcement Action. [0.50min]. Note: You may need to link one PNC to an Existing Enforcement Action. You would for instance, do this in cases where your review reveals that two PNCs have the same root cause.





B. Demonstrate how to link a PNC record to an EA

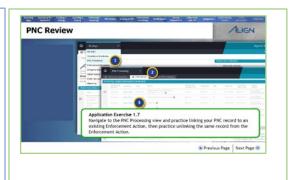
2. Show Align Solutions PNC processing view: demonstrate how to link a PNC record to an existing Enforcement Action; also show learners how to unlink a previously linked record from an enforcement action. Identify key points for learners to remember [3:00min].





C. Practice linking a PNC to an EA

3. Show Application Exercise 1.7: Ask learners to pull up Align webpage, navigate to PNC processing view and practice linking their PNC record to an existing Enforcement Action, and then practice unlinking it.





D. Summary and Review

4. Review objective; summarize 1-2 points to remember from module [0.5min].

To review the steps on how to link a PNC record to an existing Enforcement action, see Video #10 (Linking a PNC to an existing Enforcement Action)



E. Questions and Forecast

5. Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will practice sending RFIs as a part of the PNCR process.



1. 8 Sending RFIs from the PNCR Form



4-5 minutes

Objective: Send an RFI as a part of the PNC Review



Learner needs:

- User Response Guide (URG pg. 41-42)
- Video #9



Facilitator needs:

- Process flow step 5
- Video #9 screen shot

Pre-requisite: Module 1.6

Module Overview

- A. Identify PNCR RFIs on the process flow
- B. Learners view video on PNCR RFIs
- C. Summary and review
- D. Questions and forecast

Preparation:

- Review module contents
- Watch video #9 (Executing an RFI from the PNCR)
- Review italicized content and adjust as desired



A. Identify PNCR RFIs on the process flow

1. Show process flow step 5: State objective; let learners know what they need for this micro-session [0.50mins].





B. View video on PNCR RFIs

2. Show video #9 screen shot. Ask learners to watch video #9: Executing an RFI from the PNCR form [3:00mins].





C. Summary and review

3. Review objective; summarize 1-2 points to remember from module [0.5mins].

To review the steps on how to send an RFI, see URG pg. 41-42 and Video #9 (Executing an RFI from PNCR Form)



D. Questions and Forecast

4. Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will complete the PNCR to create a new Open Enforcement Action and look at linking a PNC to an existing enforcement action.



Optional Break

5. Log in as an entity to respond to an RFI, or multiple RFIs, if possible.

1.9 Data Flow and Enforcement Processing



Objective: Review PNC details to inform Enforcement Processing



Learner needs:

- Video #11 (PNCs, EAs, and Dispositions)
- Align Training Environment (Enforcement Processing view)



<u>Instructor needs</u>:

- Process flow step 6
- Align Training Environment (Enforcement Processing view);
- Poll 3 assessment

Pre-requisite:

Module Overview

- A. Introduce the concept of data flow
- B. Learners view video #11 (PNCs, EAs, and Dispositions)
- C. Demonstrate how to review PNCR data for enforcement evaluation
- D. Summary and Review
- E. Questions and Forecast

Preparation:

- Review module contents
- Watch video #11 (PNCs, EAs, and Dispositions).
- View video #12 (Enforcement processing) and practice demonstrating how to identify PNC data for enforcement evaluations
- Build poll 3 assessment
- Review italicized content and adjust as desired



A. Introduction to Data Flow

1. Process flow step 6; State objective; let learners know what they need for this module (0.5mins).

Note: The first steps in enforcement processing are largely completed outside of the Align system, but you can use Align to inform your decision. You can review the PNCR findings and analyze facts and circumstances in the Enforcement Processing view of Align





B. View Video #11 (PNCs, EAs, and Dispositions)

2. Show video #11 screen shot. Ask learners to watch video # 11: PNCs, EAs, and Dispositions in Align (2.5mins).





C. Identifying PNC data for Enforcement Evaluation

 Administer poll 3; monitor poll responses; discuss learner responses, using live platform to demonstrate if necessary [2.50min].
 Poll question:

Which of the following types of information would you expect to be able to review in a PNC data record on Align?

- o General information about the finding
- Notes on Violation Discovery and Description
- Extent of Condition Root Cause
- Entity history on the most violated standards
- o Assigned Disposition of the finding





D. Demonstrate how to review PNC for evaluation

4. Show Align solutions web page (Enforcement Processing view) and demonstrate how to review the different parts of a completed PNC for the purpose of enforcement evaluation, pointing out locations of key types of information. [1.0mins]



Demonstrate how to:

- Find the enforcement action you are looking for by filtering the unique ID column
- Find the General information about the finding
- Find All notes regarding the Violation Discovery and Description, the Extent of Condition Root Cause and Risk Analysis, as well as any Comments or Additional Documents.
- Use the magnifying glass icon next to the entity entry to access relevant information about the entity, including its compliance history and most violated standards.



E. Summary and Review

5. Review objective; summarize 1-2 points to remember from video [0.50min].

To review a PNC entry and analyze facts and circumstances surrounding it in preparation for enforcement activity, see Video # 11 (PNCs, EAs, and Dispositions in Align) and video #12 (Enforcement processing)



F. Questions and Forecast

6. Invite questions and briefly describe next micro-session's topic [0.50mins].

In the next micro-session, we will practice the assignment of a disposition in Align



1.10 Assigning an EA to a New Disposition



6-8 minutes

Objective: Assign an EA to a new Disposition



Learner needs:

- User Reference Guide (URG pg. 43-47)
- Learner's EA from module 1.8;
- Align Training Environment (Enforcement Processing)

Pre-requisite: Module 1.8



<u>Instructor needs</u>:

- Process flow step 6
- Align Training Environment (Enforcement Processing);
- Finding from module 1.8;
- Align solutions web page; Process flow step 6;

•

Module Overview

- A. Identify this phase on the process flow.
- B. Demonstrate how to assign an enforcement action (CV, CE or FFT) to disposition
- C. Learners practice assigning an EA to a new disposition
- D. Summary and Review
- E. Questions and Forecast

Preparation:

- Review module contents
- View video #13 (Assigning a new disposition)
- Use URG pg. 43-47 and practice how to assign to a new disposition (CV, CE or FFT)
- Review italicized content and adjust as desired



A. Identify phase on process flow

1. Show process flow step 6: State objective; let learners know what they need for this module (0.5mins)





B. Demo how to assign a new CV, CE or FFT disposition

Show Align Solutions Web page (Enforcement processing view).
 Demonstrate how to assign an EA to a new disposition, explaining the parts of the form in detail. Choose one of three dispositions for this example: Confirmed violation; Compliance Exception, or Find, fix and track. [2.0mins].

Note: The yellow flags indicate the items that have yet to be assigned a disposition.

Note: The Pending option is for more serious violations for which it is not yet clear whether the ultimate disposition will be a confirmed violation or settlement. Pending is also used when your region uses Expedited Settlement Agreements or NAVAPS. It is the only disposition that can be changed later, the other options are fixed.

Note: You still have the ability to issue RFIs during the EA process, but then you will need to navigate back to the PNC review form from within the EA





C. Practice assigning to a new disposition

3. Show Application exercise 1.10: Ask learners to use the steps outlined in their user Guide (pg. 43-47) and assign an EA to a new disposition (CV, CE or FFT) using finding created in 1.8 (URG 43-47) [2.5mins].





E. Summary and Review

4. Review objective; summarize 1-2 points to remember from micro-session [1:00min].

To review the steps on how to assign a new CV, CE or FFT disposition to an EA, see URG pg. 43-47; Video #13

(Assigning a new disposition)



F. Questions and Forecast

5. Invite questions and briefly describe next micro-session's topic [0.50mins].

In the next micro-session, we will practice assigning an EA to a new settlement or dismissal disposition



Optional Break

6. Your learners will need at least one additional Disposition to relate an existing EA to. You may want to take a longer break here to set that up or set it up prior to the session.

1.11 Assigning an EA to a Settlement or Dismissal



8-9 minutes

Objective: Link a PNC to a new EA; link a PNC to an existing EA



Learner needs:

- Align Training Environment
 (Compliance monitoring &
 Enforcement processing views)
- User Resource Guide (URG pg. 43-50)



Facilitator needs:

- Application Exercise 1.11
- Align Training Environment (Compliance monitoring & Enforcement processing views)

Pre-requisite: Module 1.3; 1.10

Module Overview

- A. Learners prepare finding to use for practice in this module.
- B. Demonstrate how to assign an EA to a settlement and dismissal disposition
- C. Learners practice assigning an EA to a settlement or dismissal disposition
- D. Summary and Review
- E. Questions and Forecast

Preparation:

- Review module contents
- View video #13 (Assigning a new disposition)
- Use URG to follow the steps to practice assigning an EA to a settlement and a dismissal disposition
- Identify 2 PNC entries to use for demonstration in this module
- Review italicized content and adjust as desired



A. Learners prepare finding to use for practice

1. Show Align Solutions webpage (Compliance Monitoring View): Ask learners to identify the finding they created in module 1.3 (Create a Finding), complete a preliminary screening and PNCR for it so that they may use it for practice in the current module. State objective; let learners know what they need for this module [2.0mins].





B. Demo how to assign a settlement and dismissal disposition

2. Show Align Solutions Web page (Enforcement processing view). Demonstrate how to assign a new Settlement disposition. Explain the parts of the form unique to settlements in detail. Then, using a separate finding record, demonstrate how to assign a new dismissal disposition. [2.5 mins].

Note: Settlement information can be added over time during the process.

Note: It is good to include any relevant settlement discussion notes in the "Settlement Discussions History text field."





C. Practice assigning settlement or dismissal dispositions

3. Show Application exercise 1.11: Ask learners to use the steps outlined in their user Guide (pg. 43-50) and assign a either a settlement or dismissal using finding created in 1.3 [2.0mins]





E. Summary and Review

4. Review objective; summarize 1-2 points to remember from micro-session [1:0min]. To review the steps on how to assign a new settlement or dismissal disposition to an EA, see URG pg. 43-50; Video #13 (Assigning a new disposition)



F. Questions and Forecast

5. Invite questions and briefly describe next micro-session's topic [0.5mins]. In the next micro-session, we will practice relating a disposition to an existing EA



1.12 Deleting a Disposition/Relating an EA to an Existing Disposition



7-8 minutes

Objective: Delete a disposition from the Active Dispositions tab; link an open EA to an existing Disposition



Learner needs:

- User Resource Guide (pg. 51-55)
- Disposition from 1.10 and 1.11
- Align Training Environment (Enforcement Processing)

Pre-requisite: Module 1.10; 1.11



Instructor needs:

- Align Training Environment (Enforcement Processing)
- One active Disposition to demonstrate deleting
- One active Disposition to demonstrate relating EAs
- Application Exercise 1.12

Module Overview

- A. Introduce when disposition may be deleted or an EA related to existing disposition.
- B. Demonstrate how to delete a disposition and relate an EA an existing disposition.
- C. Learners practice deleting a disposition & relating an EA to an existing disposition
- D. Summary and Review
- E. Question and Forecast

Preparation:

- Review module contents
- Watch video #14 (Deleting a Disposition/Relating to an Existing Disposition).
- Use URG pg. 51-55 to practice deleting an active Disposition and relating the orphaned EA to an existing Disposition
- · Review italicized content and adjust as desired



A. Deleting dispositions; Relating EAs to existing dispositions

Show Align solutions page (Enforcement processing - Active dispositions).
 State Objective; briefly discuss circumstances under which one may need to delete a disposition or relate an open EA to an existing disposition [1.0mins].





A. Demo deleting a disposition; relating an EA to a disposition

1. Show Align solutions webpage (Enforcement processing view): Using one of your newly assigned dispositions, click the "Active dispositions" tab and demonstrate how to delete a disposition. Click the Open Enforcement Actions tab and link the now open EA to an existing disposition. Finally, assume you have changed your mind and demonstrate how to remove an EA that is related to a disposition [2.5mins].

Note: We could delete a disposition if it was created by mistake, and you meant to link it instead.

Note: Notice that even though the old disposition is deleted, Align keeps a record of that action so that the history associated with the record is not lost. This is also where you will see any dispositions that are rejected after NERC review.



B. Practice deleting a disposition and relating an EA to an existing disposition

2. Show Application Exercise 1.12. Identify one of your newly assigned dispositions in the Active dispositions tab. Follow the steps outlined on URG (pg. 51-55) to delete the existing disposition. Then, relate the open EA record to your second existing disposition before unlinking it again [2.5mins].





D. Summary and Review

3. Review objective; summarize 1-2 points to remember from micro-session [1:0min].

To review the steps on how to delete a disposition and relate an open EA to an existing disposition, see URG pg. 43-50 and Video #14 (Deleting a disposition/Relating to an existing disposition).



E. Questions and Forecast

6. Invite questions and briefly describe next module's topic [0.5min].

In the next module, we will focus on sending Notification letters for Dispositions.



1.13 Sending Notifications for Dispositions



8-9 minutes

Objective: Delete a disposition from the Active Dispositions tab; link an open EA to an existing Disposition



Learner needs:

- Align Training Environment (Enforcement Processing; Align Dashboard)
- User Resource Guide pg. 56-59
- Active disposition from module 1.10

Pre-requisite: Module 1.10; 1.11



Instructor needs:

- Process flow step 6
- Align Training Environment (Enforcement Processing; Align Dashboard)
- Active disposition entry
- Application Exercise 1.13

Module Overview

- A. Sending disposition notifications to Entities
- B. Demonstrate how to send a Notification letter
- C. Learners practice sending Notification letters for the Dispositions they created
- D. Summary and Review
- E. Questions and Forecast

Preparation:

- Review module contents
- Watch video #15 (Sending Notifications for Dispositions)
- Use URG pgs. 56-59 to practice how to send disposition notifications;
- Review italicized content and adjust as desired



A. Sending disposition notifications to Entities

 Show process flow step 6: state objective; discuss the necessity to send notifications on dispositions to Registered Entities before sending them to NERC for review. Let learners know what they need for this module [1.5mins].

Note: Before you can send a Disposition on for NERC review or close it out in the case of a dismissal, you'll need to send the necessary notification through Align. If you try to submit without sending the notification, you get an error alert.





B. Demonstrate how to send a Notification letter

2. Show Align solutions web page (Enforcement processing view); click to the Active dispositions tab and demonstrate how to send a disposition notification to a Registered Entity, explaining each step as you go. Once you update to send the notification, navigate to the Align Dashboard to show learners where Registered Entities' "Responses to Notifications" appear in the "Items awaiting my review" column [2.5mins].

Note: The "send settlement agreement notification object is the only one that you can send more than once to the Registered Entity. This could be used in the negotiation process.

Note: This form does not validate that any of the field or attachments are included, so make sure to complete the form prior to sending it to the Registered Entity.





C. Practice sending Notification letters

3. Show Application Exercise 1.13. Ask learners to follow the steps on URG (pgs. 56-59) and send a disposition notification to the Registered Entity using the Active disposition they just created [2.0mins].





E. Summary and Review

4. Review objective; summarize 1-2 points to remember from micro-session [1:0min].

To review the steps on how to send a disposition notification, see URG pg. 56-59 and Video #15 (Sending notifications for dispositions).



F. Questions and Forecast

5. Invite questions and briefly describe next micro-session's topic [0.5mins].

In the next micro-session, we will learn how to send notifications for dispositions in the Pending status



1.14 Sending Notifications for NAVAPS Dispositions



8-9 minutes

Objective: Send a NAVAPs notification for dispositions



Learner needs:

- Align Training Environment (Enforcement Processing; Align Dashboard)
- User Resource Guide pg. 56-60
- Enforcement Action record created in the exercise in module 1.12

Pre-requisite: Module 1.12



Instructor needs:

- Align Training Environment (Enforcement Processing; Align Dashboard)
- Active disposition entry
- Application Exercise 1.13
- Active disposition in pending status

Module Overview

- F. Sending NAVAPS disposition notifications to Entities
- G. Learners prepare disposition in "pending" status for practice
- H. Demonstrate how to complete NAVAPs forms for disposition notifications
- I. Learners practice completing NAVAPS notifications
- J. Summary and Review
- K. Questions and Forecast

Preparation:

- Review module contents
- Watch video #15 (Sending Notifications for Dispositions)
- Use URG pg. 60 to practice how to send NAVAPs disposition notifications;
- Review italicized content and adjust as desired



B. Sending NAVAPS disposition notifications to Entities

1. Show Align solutions webpage (Enforcement processing) state objective; discuss the options of sending ESA or NAVAPS notifications Let learners know what they need for this module [1.5mins].





B. Prepare disposition in "Pending" status for practice

2. Show Align solutions webpage (Enforcement processing-Open EAs). Ask learners to identify the EA that they unlinked from a disposition in module 1.12, and assign it to a "Pending" disposition, to be used for practice in this module [2.0mins].





C. Demonstrate how to complete and send NAVAPs disposition notifications

 Show Align solutions webpage (Enforcement processing – active dispositions) and demonstrate how to complete the form for a NAVAPs notification, explaining each step [1.5mins].

Note: The "pending" disposition is the only one with the option to send an ESA or NAVAPS. The ESA form is identical to other notifications, but the NAVAPS adds a couple of fields for monetary penalty and non-monetary sanctions.

Note: Be aware that the Align software is built from a European application, so you do need to distinguish the currency type for monetary penalties over here.

Note: If you send an ESA or NAVAPS while the disposition is pending, Align will still require the other requisite notifications be sent once you change the status from pending to something else. For example, if you land on a disposition of Settlement, you'll still need to fill out and send the Settlement Agreement before Align allows you to move on.





D. Practice completing NAVAPs notification

(1) Show Application Exercise 1.14. Ask learners to follow the steps on URG (pgs. 56-60) to complete a form for a NAVAPs notification, using their newly created disposition in "pending" status [2.0mins].





E. Summary and Review

(2) Review objective; summarize 1-2 points to remember from micro-session [1:0min].

To review the steps on how to complete a NAVAPS disposition notification, see URG pg. 56-60 and Video #15 (Sending notifications for dispositions).



F. Questions and Forecast

(3) Invite questions and briefly describe next micro-session's topic [0.5mins]. In the next module, we will learn how to close a disposition for dismissal



1.15 Submitting Dispositions for NERC Review



18-20 minutes

Objective: Submit CE, FFT, Settlement and CV Disposition types for NERC Review



Learner needs:

- Align Training Environment
- User Guide pg. 62-66



Instructor needs:

- Application Exercise 1.15; 1.16
- 7 Example dispositions processed as shown below

Pre-requisite: Able to process findings up to disposition

Module Overview

- A. Learners review: Create 3 findings and process to disposition
- B. Demonstrate how to initiate CE/FFT & Settlement/CV closings
- C. Learners practice initiating CE/FFT and Settlement/CV closings
- D. Summary and Review
- E. Questions and Forecast

Preparation:

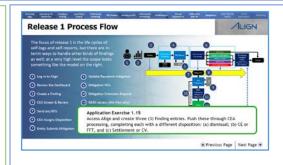
- Review module contents; Watch videos #16, 17 & 18 (Closings)
- Create/identify 7 findings to use for demonstration. Process them as follows: (1) with a CE or FFT ready to submit for closing; (2) with CE or FFT submitted and approved by NERC; (3) with a CE or FFT submitted but failed by NERC; (4) with a settlement or CV; (5) with a settlement/CV ready to submit for closing; (6) with settlement/CV submitted and approved by NERC; (7) with a settlement/CV submitted but failed by NERC
- Use URG pg. 62-66 to practice initiating closings
- · Review italicized content and adjust as desired



A. Review CEA process from finding creation to dispositions

 Review: Show Application Exercise 1.15: Ask learners to access the Align solutions webpage and create 3 finding entries. Ask them to push these through the CEA process, completing them with 3 different dispositions: (a) dismissal; (b) CE or FFT; (c) Settlement or CV [10.0mins].

Note: When you create a Settlement Disposition for the first time, there are a number of fields that populate that do not exist for other dispositions. You actually do not need to fill any of this out if you don't have the information at first. Just leave the status as 'in drafting' and all the other fields blank, and that is all you need to get started with this as a disposition. As the settlement progresses and you gain more information, you can document that information in these fields inside the active disposition, so that NERC has it for their review.





B. Demonstrate how to initiate closings for CE, FFT, Settlement, and CV

2. Show Align solutions web page (Enforcement processing view –active dispositions). Demonstrate how to initiate the following closings:



(a) Initiate closing for CE/FFT [2.5mins]

Use the example CE/FFT. Follow Steps 1-4 (submit for NERC review)

Show example of NERC approved CE/FFT that is ready for the CEA to close. Demonstrate checking that all mitigations have been completed. *The disposition should not close until you have closed out the mitigation first. There is no automated check in Align to ensure that the mitigation has been completed.*

Show an example of failed CE/FFT. If the CE or FFT fails NERC review, it falls out of the Active dispositions tab and the related EA on the Open Enforcement Actions tab reverts back to "flagged" status, indicating that it does not have a disposition assigned. In this case, a new disposition or link to an appropriate disposition will be needed.

(b) Initiate closing for Settlement/CV [2.5mins]

Use the example Settlement/CV. Follow Steps 1-10 (submit for NERC review)

Show example of NERC approved Settlement/CV that is ready for the CEA to close. Demonstrate completion of all obligations (steps 11-13).

Obligations are primarily used in the case of a Settlement or Confirmed Violation, but you may want to use them with CEs and FFTs to keep track of everything that needs to be completed prior to closing.

Show an example of failed settlement/CV. If it fails NERC review, it falls out of the Active dispositions tab and the related EA on the Open Enforcement Actions tab reverts back to "flagged" status, indicating that it does not have a disposition assigned. In this case, a new disposition or link to an appropriate disposition will be needed.



C. Practice initiating CE/FFT and Settlement/CV closings

 Show Application exercise 1.16: Ask learners to follow the steps in the URG (pgs. 62; 64-66) initiate the closing process for the CE/FFT and the Settlement/CV that they processed.
 [2.0mins]





D. Summary and Review

4. Review objective; summarize 1-2 points to remember from micro-session [1:0min].

To review the steps on how to initiate the closing of CE/FFTs; Settlements/CVs, see URG pgs. 62-66 and Videos #
17 (Closing CEs and FFTs) and 18 (Closing settlements and CVs).



E. Questions and Forecast

5. Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will close a dismissal and complete the closing of our CEs/FFTs as well as the Settlement/CVs.



Optional Break

6. You may use this time to access the system in the role of NERC and approve all the dispositions that learners have submitted for NERC processing in this module, so they can complete the closing process in the next module. See video #5 of the NERC library – Approving or Failing a Disposition)

1.16 Closing Dispositions



Objective: Close dispositions for dismissals, CE, FFT, Settlement & CVs



Learner needs:

- Align Training Environment (Enforcement Processing)
- User Resource Guide pg. 63, 67-69
- NERC approved dispositions from module 1.15

Pre-requisite: Able to process findings up to disposition



Instructor needs:

- Align Training Environment (Enforcement Processing)
- Application Exercise 1.17
- Figure 1 disposition comparison
- Example dispositions from module 1.15

Module Overview

- A. Introduce differences between closing types
- B. Demonstrate how to close a dismissal, CE or FFT, Settlement or CV
- C. Learners practice closing a dismissal, CE or FFT, Settlement or CV
- D. Summary and Review
- E. Questions and Forecast

Preparation:

- Review module contents
- Create/identify one finding to use for demonstration, process it as a dismissal. View videos # 16 -18 (Closings);
- Use URG (Pgs. 61-69 to practice processing closings for all 3 types of dispositions)
- Log in as NERC and approve learners' dispositions
- Review italicized content and adjust as desired



A. Comparing different types of closings

1. Show figure 1 - Introduce the closing process and discuss major differences between the three types of closings (dismissals, CE/FFT, Settlement/CV). [1.5mins].

	Dismissal	CE or FFT	Settlement or CV
Notification to Registered Entity	1	1	1
CEA Review of mitigations		1	
CEA Review of Obligations			1
NERC Review Required		1	/



B. Demonstrate how close a dismissal, CE or FFT, Settlement or CV

- 2. Show Align solutions web page (Enforcement processing view active dispositions). Demonstrate how to: [2.5mins]
 - a. Close a dismissal disposition use the example dismissal created for this module
 - b. Close a CE/FFT, using the example initiated in module 1.15, now NERC approved.
 - c. Close a Settlement/CV, using the example initiated in module 1.15, now NERC approved





C. Practice closing a dismissal, CE or FFT, settlement or dismissal

3. Show Application exercise 1.17: Ask learners to follow the steps in the URG (pgs. 61, 63, 67-69) complete the closing for each of the three dispositions they processed in module 1.15. [2.5mins]





E. Summary and Review

5. Review objective; summarize 1-2 points to remember from module [1.0min].

To review the steps on how to close Dispositions in Align, see URG (pg. 63-69) and videos #17 and 18 (Closing a CE or FFT & Settlement and Confirmed Violations)



F. Questions and Forecast

6. Invite questions and briefly describe next module's topic [0.5min]. In the next module, we will do a quick review exercise.



Optional Break

2.0 Introduction to Mitigation Management in Align



7-8 minutes

Objective: Describe the process flow for mitigating activities; send mitigating activities back for resubmittal as a Mitigation Plan



Learner needs:

 Video #19 (Intro to Mitigating Activities)



<u>Instructor needs:</u>

- Process flow (mitigation management)
- Video #19 (Intro to Mitigating Activities)
- User Guide pg. 70

Pre-requisite:

Module Overview

- A. Introduce Mitigation management
- B. Learners view video #19 (Introduction to mitigation management)
- C. Discuss the six stages of the mitigation process in Align
- D. Summary and Review
- E. Questions and Forecast

Preparation:

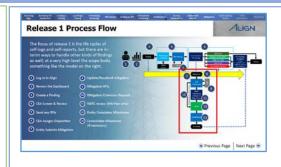
- Review module contents
- Watch video #19
- Review URG pg. 70 prepare discussion points to explain mitigation status progression
- Review italicized content and adjust as desired



A. Introduction to Mitigation Management

 Show Process flow (mitigation management): State objective; Introduce Mitigation Management: [1.00]

When a registered entity submits a finding they have the option to
submit along with it the mitigating activities they intend to take to
address the issue. Or, they can submit mitigation separately later.
In general, everything should start out as mitigating activities
unless you determine that a Mitigation Plan would be required.
This conversion of mitigating activities to Mitigation Plan is
something that you will have access to do but your registered

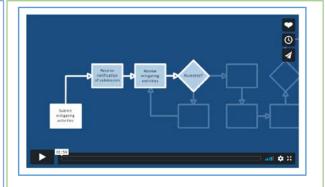




entities will not.

B. View Video: Intro to Mitigation Management

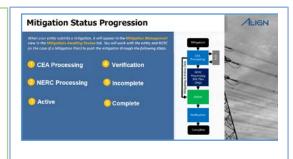
2. Show video 19 (mitigation management) screen shot: Ask learners to watch video #19: Introduction to mitigating activities [2.50mins].





C. Discussion on Six stages of Mitigation Status Progress

3. Show next screen shot (Mitigation Status Progression). Discuss (explain), at a high level, the six (6) stages through which the mitigation process progresses [2.0mins].



- a. <u>CEA processing</u> refers to the state of any mitigation in Align that has been submitted to you. The status will not change until you complete your review and accept or reject the mitigation. While in this status, you can send RFIs to help complete your review.
- b. <u>NERC Processing</u> If you convert mitigation activities to a Mitigation Plan, the entity will need to resubmit the mitigation as a Mitigation Plan and once you approve it, the mitigation will undergo NERC Review.
- c. <u>Active</u>- Once the mitigation is approved, it will show as Active. While in this stage, you can monitor entity activity as they complete milestones or add scope expansion. If changes need to be made to the mitigation, you can still send it back for a revision.
- d. <u>Verification</u>: Once the entity completes all milestones, they will submit the mitigation to you for verification. The status will change to Verification and the mitigation will no longer be editable for the entity. You may send RFIs during this stage as well.
- e. <u>Incomplete</u> If you decided that the mitigation does not pass verification, you can send it back as incomplete. The entity will need to add the missing information and resubmit for verification.
- f. <u>Complete</u> Once a mitigation has been verified, its status will change to complete and will stay in the All Mitigations tab for reference.



D. Summary and Review

4. Review objective; summarize 1-2 points to remember from module [1:0min]. For an overview of the mitigation management process, see URG pg70; and Video #19 (Introduction to mitigating activities).



E. Questions

5. Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will review and begin the processing of submitted mitigation activities and plans



Optional Break

6. Optional Break: Access the Align system in the entity view, create a finding to assign to each learner, complete with 2 milestones per finding. Also, create an additional finding with 2 milestones to use for demonstration in the upcoming modules.

2.1 Mitigation Management: Review and Processing



14-15 minutes

Objective: Review, accept or reject a submitted mitigation



Learner needs:

- URG pgs. 71-75
- Finding assigned by instructor
- Registered Entity videos #10 and 11 (mitigating activities);
- Align Training Environment (Mitigation Management)

Pre-requisite: Module 2.0



<u>Instructor needs</u>:

- Process flow mitigation status progression;
- Align Training Environment (Mitigation Management; Registered Entity view)
- Application Exercise 2.1; 2.2
- Example finding for demonstration;
- Video 10 & 11 screen shots

Module Overview

- A. Review CEA and NERC Processing stages.
- B. Learners practice reviewing mitigation activities
- C. Demonstrate how to review mitigation activities
- D. Learners practice extending the review period and accepting the Mitigation Plan
- E. Summary and Review
- F. Questions and Forecast

Preparation:

- Review module contents
- Use URG 71-74 to practice reviewing mitigation activities, and accepting, rejecting or asking them to be resubmitted as mitigation plans;
- View video 10 & 11 (Intro to mitigating activities; submitting activities);
- Review italicized content and adjust as desired



A. CEA and NERC Mitigation Processing

 Show next screen shot (Mitigation Status Progression – process flow). Review the CEA Processing and NERC processing stages of mitigation management [1.5mins].

<u>CEA processing</u> refers to the state of any mitigation in Align that has been submitted to you. The status will not change until you complete your review and accept or reject the mitigation. While in this status, you can send RFIs to help complete your review

<u>NERC Processing</u> – If you convert mitigation activities to a Mitigation Plan, the entity will need to resubmit the mitigation as a Mitigation Plan and once you approve it, the mitigation will undergo NERC Review





B. Practice reviewing mitigation activities

2. Show Application exercise 2.1. Ask learners to follow the steps in the URG (pgs. 71-74) to review the record of mitigation activities assigned to them and request the "Entity" to submit them as a mitigation plan [2.0mins].





C. Demonstrate how to review mitigation activities

3. Show Align solutions webpage (Mitigation management view) and demonstrate how to review a record of mitigation activities. For this demonstrated example, reject the submission, add an RFI and ask the Entity to resubmit [2.0mins].

The process for sending a Mitigation RFI is identical to sending an RFI from the PNCR form. The only difference is that it will be labelled as "RFI for Mitigation" rather than "RFI for Finding."





D. Overview of mitigation management from Registered Entity View

4. Show video 10 and 11 screen shots (Introduction to mitigating activities; Submitting mitigating activities) screen shot: Ask learners to watch video #10 and 11 to see what happens in the mitigation management environment from the Entity's point of view [5.50mins]

<u>During this time</u>: Log into Align's registered entity view, access each learner's assigned record entity and resubmit it as a mitigation plan. Also, pull up the record of the example entry from step # 2 above; respond to the RFI and resubmit for CEA review.





E. Practice approving mitigation plans

5. Show Application exercise 2.2. Ask learners to follow the steps in the URG (pg. 75) to identify the mitigation plan submitted by the entity and approve it [2.0mins].





E. Summary and Review

6. Review objective; summarize 1-2 points to remember from module [1:0min].
As a review, highlight any critical parts of the mitigation plan form you would like to point out.
To review the steps on how to review, accept or reject submitted mitigation activities, see URG pgs. 71-75. To get an overview of the mitigation process from a Registered entity perspective, see Video #20 (Accepting Mitigation Activities); Video #10 (Intro to Mitigating activities), #11 (submitting mitigating activities) from the Registered Entity video series.



F. Questions and Forecast

7 Invite questions and briefly describe next module's topic [0.5mins].

In the next module, we will review and begin the processing of submitted mitigation activities and plans



Optional Break

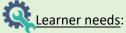
8. Optional Break: Access the Align system in the NERC role and approve each learners' mitigation plan.

2.3 Mitigations: Extensions, Requests, Verification



8-9 minutes

Objective: Approve a milestone extension request; discuss how to initiate a revision for an Active mitigation



- Example mitigation entry from module 2.2
- Align Training Environment (Mitigation Management)
- URG pgs. 76-81

Pre-requisite: Module 2.0; 2.1



Instructor needs:

- Mitigation Status Progression process flow;
- Align Training Environment (Mitigation Management)
- Mitigation Activity entry from module 2.2
- Milestone extension request example
- Align solutions webpage (Mitigation management view; Registered Entity view);
- Application Exercise 2.2.

Module Overview

- A. Mitigation Status Progression process flow
- B. Demonstrate how to respond to RFIs and request revisions
- C. Practice approval and verification of mitigations
- D. Summary and Review
- E. Questions and Forecast

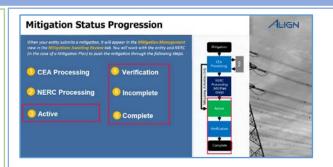
Preparation:

- Review module contents
- Use URG pg. 76-77 to practice revision requests and approvals;
- URG pgs. 78-79 to practice responding to milestone extension requests;
- URG pg. 80-81 to practice the verification process.
- Review italicized content and adjust as desired



A. Mitigation Status Progression - process flow

 Show next screen shot (Mitigation Status Progression – process flow). Review the active and verification stages of mitigation management [1.5mins].



<u>Active</u>- Once the mitigation is approved, it will show as Active. While in this stage, you can monitor entity activity as they complete milestones or add scope expansion. If changes need to be made to the mitigation, you can still send it back for a revision.

<u>Verification</u>: Once the entity completes all milestones, they will submit the mitigation to you for verification. The status will change to Verification and the mitigation will no longer be editable for the entity. You may send RFIs during this stage as well. If you decided that the mitigation does not pass verification, you can send it back as incomplete. The entity will need to add the missing information and resubmit for verification. Once a mitigation has been verified, its status will change to complete and will stay in the All Mitigations tab for reference.



B. Demonstrate how to respond to RFIs and request Revisions

2. Show Align solutions webpage (Mitigation management view) and demonstrate how to review and approve responses to mitigation RFIs using the example mitigation entry used for demonstration in module 2.1. In the CEA role, request revision from the Entity (reference URG pgs. 76-77).

Switch to Align solutions webpage (Registered Entity - Mitigation management view) and show learners how Entities respond to revision requests and resubmit mitigation activities. Switch to Align solutions webpage (Mitigation management view) and demonstrate how to accept mitigation activity. Switch to Align solutions webpage (Registered Entity – Mitigation management view) and show learners how Entities request milestone extensions (reference URG pgs. 78-79). Switch to Align solutions webpage (Mitigation management view) and demonstrate how to accept milestone extension and how to verify an entry as incomplete. Access the Entity view to fulfill CEA's "incomplete" requests and resubmit entry. In the CEA's Mitigation management view, verify the entry as complete (reference pg. 80-81). [4.0mins]





C. Practice approval and verification of mitigation plans

3. Show Application Exercise 2.3. Ask learners to follow the steps in URG (pgs. 80-81) to approve the mitigation plan and verify it as complete [2.0mins]





D. Summary and Review

4. Review objective; summarize 1-2 points to remember from module [1:0min]. To review the steps on how to respond to extension requests; how to request and accept CEA revisions; and how to complete the verification process, see URG pgs. 76-81; and video # 21 (Resubmittals); #22 (Milestone Extension requests); #23 (Revisions); #24 (Verifying Completion); #25 (Mitigation plans); #26 (accepting/rejecting mitigation plans); #27 (Mitigation Plan- NERC review; #28 (completing mitigation plans).



E. Questions and Forecast

5. Invite questions and briefly describe next module's topic [0.5mins]. In the next module, we will look into consolidated mitigations



Optional Break

2.4 Consolidated Mitigations



12-15 Minutes

Objective: Explain consolidated mitigations process; create a consolidated mitigation; send mitigations back to Entity for revision



Learner needs:

- Align Training Environment (PNC Processing View)
- Video #29 (Consolidated Mitigations)
- User Guide pg. 82-83
- mitigation entry from module 2.2

Pre-requisite: Modules 2.1; 2.2



Instructor needs:

- Process flow step 13
- Video #29 screenshot
- Align Training Environment (PNC Processing view)
- Application Exercise 2.4

Module Overview

- A. Introduce consolidated mitigations and identify phase in process flow
- B. Learners view consolidated mitigations video
- C. Practice creating a consolidated mitigation and sending to Entity for Revision
- D. Summary and Review
- E. Questions and Forecast

Preparation:

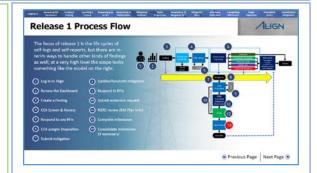
- Review module contents
- View video #29 (Consolidated Mitigations) and review URG pgs. 82-83; 77 to practice how to consolidate mitigations and send them back to the Entity for revision.
- Review italicized content and adjust as desired



A. Introduce Consolidated Mitigations

1. Show Process flow step 13 (Consolidate Mitigations). State objective; identify the consolidated mitigations phase on the process flow and introduce the idea of consolidating mitigations under one EA [1.5mins].

Every new finding in Align generates an associated mitigation record for that finding. As part of the PNCR, you as a CEA will decide whether to assign the PNC and its mitigation record to a new Enforcement action or consolidate the PNC with an existing EA that already has a mitigation associated with it. If the PNC is consolidated with an existing EA, the mitigation originally associated with the PNC is orphaned and moves to the Consolidations tab

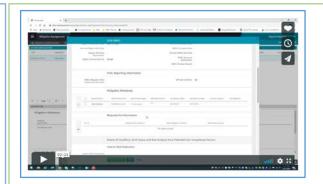




B. View Consolidated Mitigations video

2. Show Video #29 Screenshot: Ask learners to watch video and pay attention to the consolidated mitigations process. Once everyone is done watching, review major highlights of the video in discussion.

Align keeps the mitigation associated with the PNC that was originally consolidated under the EA and then moves the mitigations associated with any additional PNCs into this separate 'Consolidations' tab. These orphaned mitigation records stay here for reference in case you need to coordinate with the entity and have them merge any information in these records with the mitigation that remained associated with the EA [5.0mins]





C. Practice creating a consolidated mitigation and sending mitigation to Entity for Revision

3. Show Application Exercise 2.4. Watch the Consolidations video again and review URG (Pgs. 82-83) with the aim of completing the following tasks: (a) Consolidate the PNC from your assigned practice mitigations record under an existing Enforcement Action. (b) Assume that your Entity needs to merge the milestones in the consolidated mitigation with the active mitigation that is associated with the EA. Send the Active mitigation back to the entity for a revision [7.0mins]





D. Summary and Review

4. Review objective; summarize 1-2 points to remember from module [1:0min]. To review the steps on how to consolidate mitigations and send them to the entity for revisions, see video # 29 (Consolidated Mitigations) and review URG pgs. 82-83; 77).



E. Questions and forecast

5. Invite questions and briefly describe next module's topic [0.5mins]. In the next module, we will see how to search for activities related to specific Regional Entity and information related to specific Registered entities.



Optional Break

2.5 CMEP Activity Search & Entity Information



5-6 minutes

Objective: Search for CMEP Activity; review entity information and give an entity permission to self-log



Learner needs:

- Align Training Environment (CMEP Activity Search & Entity Information views)
- User Guide pg. 84-87



Instructor needs:

- Application Exercise 2.6
- Align Training Environment (CMEP Activity Search & Entity Information views)

Pre-requisite:

Module Overview

- A. Introduce the CMEP Activity Search and Entity Information functions
- B. Demonstrate how to search for activity and give entities permission to self-log
- C. Practice searching and granting self-log permissions
- D. Summary and Review
- E. Questions and Forecast

Preparation:

- Review module contents
- Use URG pgs. 84-87 to practice CMEP Activity search and giving entities permission to self-log



A. Introduce the CMEP Activity Search and Entity Information functions

Show Align solutions webpage (CMEP Activity Search View).
 State objectives and describe the circumstances under which learners would need to use these functions; let learners know what they need for this module [1.0mins].





B. Demonstrate how to search for CMEP activity and give entities permission to self-log

2. Demonstrate how to perform a CMEP Activity Search and give entities permission to self-log [1.5mins].





C. Practice searching for CMEP activity and granting selflog permissions

3. Show Application Exercise 2.5. Ask learners to follow the steps outlined in the URG pgs. 84-87 and practice searching for CMEP activity and granting self-log permissions [2.0mins].





D. Summary and Review

4. Review objective; summarize 1-2 points to remember from module [1.0min].

In this module, we looked at the CMEP Activity Search and Entity Information sections. To review these, see the URG pg. 84-87.



E. Questions

5. Invite and respond to any questions [0.5mins].