

**Rapid Improvement Work Team
Summary of Discussion and Recommendations
January 7-8, 2014**

PROBLEM STATEMENT

A Rapid Improvement Work Team was created to address the weakness stated in the draft Department of the Interior evaluation of the Bureau of Reclamation’s Safety and Occupational Health (SOH) Program – “a degree of complacency ... that results in the acceptance of facility hazards and results in incomplete SOH program implementation”.

The Team met for a single two-day session on January 7-8, 2014 and using a facilitated problem solving process, discussed and analyzed the weakness. This draft report provides a summary of those discussions and proposed recommendations/actions for consideration by the Reclamation SOH Council and Reclamation senior executives. Team members are listed in Table 1.

SUMMARY OF DISCUSSION

Observations

- Over a period of years, we have moved from a Reclamation-wide culture of SOH to a more locally-driven culture.
- We didn’t get where we are (i.e., a degree of complacency) in a week or a month and we won’t get out of it in a week or a month.
- There are business units throughout Reclamation that have retained their positive SOH culture.
- There are many factors that have contributed to where we are.

Key Factors Affecting Where We Are

- Communication/Core Value
 - There is not a consistent message of what is expected throughout all levels of management (i.e., consistent delivery of the message that SOH is an expectation of the organization).
 - SOH is not always considered to be part of the work (i.e., integrated into the work) but more of “an addition” to the work.
 - Employees throughout the organization may not feel comfortable “calling out” SOH issues (due to lack of respect from peers, concern for future promotion, etc.).
 - We are not sharing SOH experiences in a timely manner organization-wide (both good and bad) to learn from each other and potentially avoid similar situations in other offices.
 - We tend to be more “reactive” than “proactive”; i.e., focusing more on lagging indicators (e.g., SOH statistics) vs. leading indicators (e.g., training).
- Education
 - We no longer consistently train employees throughout the organization on the “yellow book” (Reclamation Safety and Health Standards, or RSHS).

- We are not consistently training new supervisors on SOH as a part of their mandatory training.
- We are not consistently training all new employees on SOH.
- DOI Learn does not provide the capability to notify supervisors/training officers of the need for refresher training; tools available to supervisors to identify task-based training are not well publicized.
- There is not a consistent process of using position descriptions to identify required training.
- Accountability
 - There is a lack of SOH accountability up and down the chain of command (upper management, supervisors, through employees). There is also inconsistent presence of safety elements in performance plans and concern for rating system that penalizes reporting an injury or a safety concern.
 - There is inconsistent reporting of safety concerns, due to fear of punitive measures, or fear of lack of respect, or failure to recognize a near-miss event.
 - SOH programs and inspections must be completed in a timely manner to identify existing deficiencies and hazards.
 - Failure to mitigate or correct deficiencies identified in audits, inspections, meetings, and incidents in a timely manner may lead to reoccurring events.
- Resources
 - Employees are often over-worked due to current staffing levels and longer hours can lead to unsafe practices.
 - Shortage of staff contributes to potential use of unsafe practices to meet the workload; (e.g., deferred preventive maintenance (PM) causes forced outages which potentially leads to “cutting corners” and being “yo-yoed” between jobs).
 - Staff shortages result from a variety of reasons: backlog of filling vacant positions; lengthy time related to the recruiting and hiring process; lack of qualified candidates; inability to compete with outside agencies and the private sector; and lack of succession planning.
 - Employee morale is affected negatively by being understaffed.
 - Loss of awards programs affects our ability to provide incentives for positive behavior.
 - Competing priorities - SOH, NERC/WECC, critical PMs, forced outages, reviews/audits - exacerbates this “lack of time.”
 - Increased demands of regulatory/environmental and reporting/accountability requirements have added additional responsibilities to the workforce.
 - Aging infrastructure has increased the prevalence of forced outages and unscheduled repairs.
 - More time spent on preparation for contingency exercises, periodic exams, safety inspections and abatement aggravates the situation.
 - Loss of institutional knowledge due to loss of experienced employees (retirements, transfers) results in increased timeframes to perform PMs and other work.

- The staffing model for Operations and Maintenance facilities and resultant staffing levels may not accurately reflect the realities of today’s workload environment, (e.g., first-level supervisors are so burdened with administrative tasks that, in many cases, they spend little, if any, time on the plant floor).
- Effective Use of SOH Community
 - We are not consistent regarding the roles and utilization of our SOH personnel
 - SOH staff are often focused more on “reactive” activities (e.g., accident reporting and investigation, compiling SOH statistics, etc.) rather than “proactive” activities (e.g., providing advice in job planning hazard identification/mitigation, assisting in training to prevent incidents, etc.)
 - SOH requirements are inconsistently understood and applied.
 - SOH requirements may be seen as not having value and safety staff may at times even be viewed as “the adversary”.
- Hazard Identification and Assessment of Risk
 - Organizationally, we are not consistently recognizing hazards and properly assessing risk (probability of occurrence, severity of injury) before doing the job.
 - Job hazard analyses (JHAs) are not approached in a consistent manner.
 - Sometimes “overdone” for simple jobs
 - Sometimes overlooked for highly repetitive jobs which leads to complacency and lack of perception if the situation has changed
 - JHAs for high risk activities often lack review by qualified personnel, or “fresh eyes”

RECOMMENDATIONS

The Team considered the following definition of culture: “a set of shared attitudes, values, goals, and practices that *characterize an organization.*”

The Team recommends to the SOH Council and Reclamation senior executives that Reclamation adopts the goal of moving from a locally-driven SOH culture to a *Reclamation-wide* SOH culture.

Expected Outcomes

The Team expects several outcomes of achieving this goal including:

- Executive management (Reclamation Leadership Team) will lead by setting expectations and demonstrating visible support ensuring a “**safety-always**” approach to our work.
- All levels of management will communicate expectations, roles, and responsibilities and ensure that they are clearly understood and implemented.
- First-line supervisors will have the necessary resources, education, and support to implement all aspects of the SOH Program.
- Employees will have the necessary resources, education and support to comply with all SOH requirements.

Potential Actions

The Team brainstormed potential actions to address the key factors from an organizational perspective and ranked them in terms of their relative impact to changing the SOH culture. We recommend that each business unit also identify their most significant SOH issues, consider potential actions, and implement those with the highest impact.

First Tier

- Require Managing Employee Safety and Health (MESH) training for all supervisors.
- Safety offices need to work with project offices to determine all required safety training on a job-specific basis (e.g., the crafts level).
- Incorporate safety into all employees' performance plans and develop a framework for performance standards that promote a positive safety culture.
- Develop Hazard recognition/risk assessment tools for use at the operational level.
- Management should seek ways to improve recruitment and retention effectiveness, including augmentation of succession planning.
 - Consider partnering with other agencies (e.g., BPA/WAPA, VA, universities, trade associations, etc.) to enhance recruitment.
 - Streamline the recruiting and hiring process.

Second Tier

- Require all offices to establish and maintain a Safety Committee with clearly defined mission, roles, and responsibilities in partnership with union and/or employee representatives.
 - Safety committees will provide communication, support, and advice to management and make decisions as the committees' charters allow, regarding safety issues.
- Management should ensure sufficient program funding is available to support the safety programs, particularly for non-direct funded facilities.
- Management should allocate sufficient budgetary resources to support the safety program (e.g., maintain proficiency among safety community).
- Improve working relationships and coordination between the safety community and those they support (e.g., via clarifying roles and responsibilities).
- Investigate the potential use of behavior-based safety programs.

Third Tier

- Provide continued task-specific training
- Require training on RSHS for all employees as applicable to job responsibilities
- Add safety component to new employee orientation
- Ensure all levels of management complete required safety training.
- Acquire Reclamation-wide ability to forecast and send reminders of training requirements

Table 1. Rapid Improvement Work Team Members

Name	Region	Job	Role
James Meredith	Denver	SOH Program Manager	SOH Manager
Corey Dickson	LC	HVAC Mechanic	WG/BB
Gary Swisse	GP	Powerplant Operator	WG/BB
Juli Smith	LC	Industrial Hygienist	SOH Hygienist
Bruce Ludington	PN	Facility Manager, Irwin ID	Manager
Dave Crockett	PN	Supervisory Facility Operations Specialist	Supervisor
Karl Semoneit	MP	CCAO Electrician Maintenance Supervisor	Supervisor
Kevin McDowell	LC	LCDO SOH	SOH Manager
Bob Morton	UC	ABQAO Safety Specialist	SOH Specialist
Terry Fulp	LC	LC Regional Director	SES
Brent Esplin	GP	MTAO Program Manager	Manager
Duncan Nims	PN	Regional Learning Officer	Facilitator