

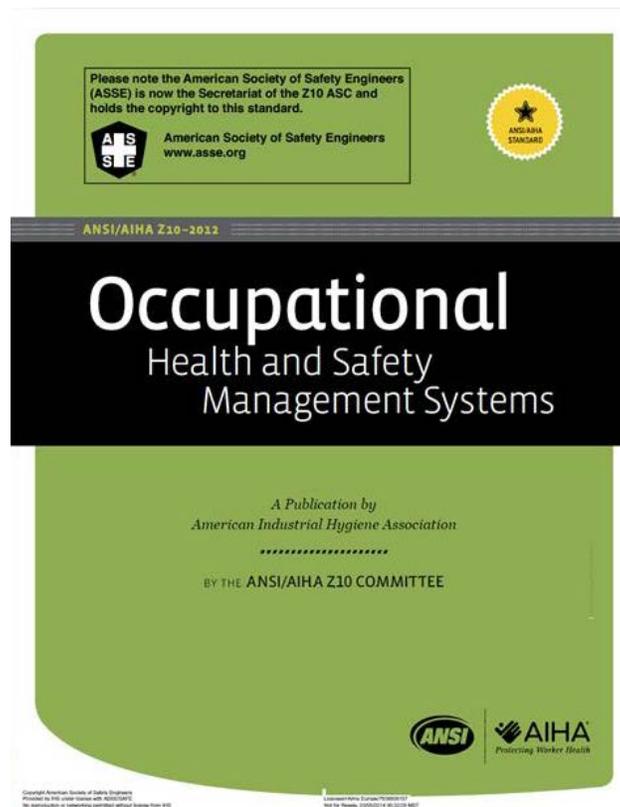
RECLAMATION

Managing Water in the West

Final Draft Report

American National Standard for Occupational Health and Safety Management Systems (ANSI Z10)

Safety and Occupational Health
Program Action Plan Team #2 Recommendations



U.S. Department of the Interior
Bureau of Reclamation

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Mission Statements

The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to Indian Tribes and our commitments to island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

American National Standard for Occupational Health and Safety Management Systems (ANSI Z10)

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Acronyms

ANSI Z10 or Z10	American National Standard for Occupational Health and Safety Management Systems
D&S	Directives & Standards
DOI	U.S. Department of the Interior
JHA	Job Hazard Analysis
MESH	Managing Employee Safety & Health (Training)
OHSMS	Occupational Health and Safety Management System
RLT	Reclamation Leadership Team
RSHS	Reclamation Safety & Health Standards
SOH	Safety & Occupational Health

Executive Summary

In 2012, the U.S. Department of the Interior's Office of Occupational Safety and Health (DOI) conducted a review of the entire Reclamation Safety and Occupational Health (SOH) Program and identified areas needing improvement. Two of the review's conclusions (identified in a report published in July 2013) refer to (1) the lack of accountability systems to ensure the effective implementation of the Safety and Occupational Health Program and (2) the incomplete implementation of the safety policy as the cause for Reclamation not establishing safety as a core value. Additionally, the lack of an implementation plan was identified in multiple conclusions within the DOI report.

Program Action Plan Teams were established in 2014 to address the deficiencies noted in the review. Team #2 was tasked to evaluate the agency's implementation of Reclamation safety policy [SAF P01](#) (dated July 23, 2013) which states that Reclamation will implement the principles of American National Standard for Occupational Health and Safety Management Systems (ANSI Z10 or Z10) – “Plan, Do, Check, Act”.

The objective of this report is to provide recommendations to address gaps in existing Reclamation policies, directives and standards (D&Ss), and implementation actions, and more fully integrate the ANSI Z10 principles into Reclamation's safety culture.

The Team recommends the Reclamation Leadership Team (RLT) take the following actions to achieve this goal (more details can be found in the “Recommendations” section of this report):

1. Expand and clarify Reclamation's Safety Policy, SAF P01.
2. Re-write / clarify Reclamation's policy implementation instruction, SAF 01-01, with references to new supplemental directives.
3. Develop supplemental D&Ss to address the gaps with ANSI Z10 principles regarding employee participation, planning, implementation, evaluation, and management review.
4. Streamline implementation efforts within existing processes and internal controls where practical.
5. In the short term, begin implementing the recommendations provided to resolve the gaps identified in the perception survey (Appendix A) and improve communications to clarify expectations.

The Team concludes that developing a system of directives that align Reclamation policies and standards with ANSI Z10 would provide the foundation for more successful SOH program implementation. Additionally, implementation of the ANSI Z10 management system will enable continual, measureable, and sustainable improvement.

Background

The Department of Interior’s Office of Occupational Safety and Health reviewed Reclamation’s Safety and Occupational Health Program in 2012. Two of the report’s conclusions (1-2 and 6-1, seen below) have general and specific references, respectively, to the implementation of Reclamation’s SOH policy SAF P01. Conclusion 1-2 identifies the need to establish safety as a core value, while Conclusion 6-1 states that SAF P01, and in particular, its reference to adopting American National Standard for Occupational Health and Safety Management Systems (ANSI Z10 or Z10), has the potential to establish the foundation for a strong safety culture within Reclamation.

Table 1: DOI SOH Report Conclusions Addressed by Team #2

Conclusion 1-2	Conclusion 6-1
<p>Senior leadership and line management have not established safety as an organizational value throughout all ranks of Reclamation and <u>have not established accountability systems to ensure effective implementation</u> of the safety and occupational health program at the working level. A degree of cultural complacency exists in Reclamation that results in the acceptance of workplace hazards and contributes to the presence of uncorrected hazards, non-compliance issues, and <u>incomplete SOH program implementation</u>. ... The newly adopted safety and health policy (SAF P01) could serve as a foundation to address this weakness, but <u>an implementation plan has yet to be developed</u>.</p>	<p>Reclamation has recently approved Reclamation Manual Policy SAF P01, Safety and Occupational Health Program that establishes the foundation for an effective SOH Program. This policy defines responsibilities and also requires SOH managers to organizationally report to senior leadership or management of their respective offices which is potentially of great benefit to the safety program. Very importantly it adopts ANSI Z10 principles for an SOH management system and accordingly emphasizes continuous improvement processes and “developing and implementing SOH as a core value of Reclamation.” This policy establishes the foundation to build a strong safety culture <u>Reclamation has not established a concrete action and implementation plan</u> with expectations, action items, and timetables to achieve the worthwhile objectives of this policy; however this will be addressed beginning with its FY 2014 Action Plan.</p>

In 2014, 21 Reclamation Action Teams were formed to address the various weaknesses in the SOH Program that were identified in the DOI report. SOH Action Team #2 was tasked with identifying gaps in the implementation of SAF P01 and ANSI Z10. SAF P01 provides direction

for the implementation of Reclamation's SOH Program as required by DOI and Executive Orders, and is designed to incorporate the principles and best practices identified in Z10.

Although SAF P01 was finalized in 2013, it was not clear how well the policy had been implemented across Reclamation. Z10, a national consensus standard, employs the fundamental process of continuous improvement in meeting and exceeding SOH standards to help ensure employers provide a safe and healthful workplace. Z10 is valuable to the entire safety action process and at least 16 of the 21 Reclamation Safety Action Teams are addressing Z10 principles in their efforts.

The Team approached the task by reviewing Reclamation's existing SAF documents to evaluate if the ANSI Z10 principles are fully addressed in the policy and directives. The implementation of the SAF policy and ANSI principles was then assessed by conducting a survey of Reclamation management staff and safety professionals. Lastly, gaps in Reclamation's implementation of SOH policies and D&Ss were characterized. Recommendations were developed to resolve both the policy and implementation gaps.

Reclamation has one policy, [six D&Ss](#) and a handbook of standards for the agency's SOH Program. Of these, [SAF P01](#) establishes the policy, [SAF 01-01](#) provides general program implementation guidance, and the [Reclamation Safety and Health Standards \(RSHS\)](#) provide the minimum required criteria for Reclamation workers and contractors. The remaining five documents provide guidance on specific topics under the umbrella of the SOH Program: these include accident reporting and investigation (SAF 01-02), motor vehicle safety (SAF 01-04), diving (SAF 01-05), inspection and abatement (SAF 01-06), and exposure assessment (SAF 02-01). Upon reviewing these D&Ss, the Team determined its focus should be on the program policy and implementation directive.

Team #2's review of these documents found that the ANSI Z10 principles are not fully addressed in Reclamation policy and directives, and that additional implementation guidance is required. A consolidated implementation plan that more closely aligns SAF 01-01 with Z10 would significantly improve the program and allow for more measureable progress, consistent annual goal prioritization, and programmed periodic reviews.

A Google survey consisting of 28 questions was sent to management and safety professionals throughout the agency to assess gaps in the knowledge of and implementation of SAF P01 and ANSI Z10 principles. With a response rate of approximately 71%, the prevailing perception is that Reclamation maintains the workplace and equipment in a safe manner, and continual improvement of SOH program performance is occurring. However, understanding the roles and responsibilities of SOH personnel and their ability to effectively accomplish their work was seen

as a program weakness. Using these responses, Team #2 identified and prioritized the specific areas needing improvement, and made recommendations to address the gaps.

Disparities seen in the survey results, such as those related to roles, responsibilities and processes involving safety support and employee participation appear to correlate with the lack of specific direction in the D&S. Because ANSI Z10 is stated as policy in SAF P-01, but has not been reflected in the implementation directive (SAF 01-01), there is a general lack of knowledge of the standard and its principles.

Reclamation's SOH Program policy provides the guidelines that demonstrate Reclamation's acceptance of systems thinking for the SOH Program; however, the program implementation and overall infrastructure is incomplete and does not provide specificity, leaving organizational units within Reclamation to develop individualized methods to implement and assess SOH system progress. Developing a system of directives that align with Z10 and the DOI criteria would provide the foundation for systemic thinking and implementation. Additionally, implementation of the ANSI Z10 management system will enable continual, measureable, and sustainable improvement. To accomplish this, the system policies, directives, and standards need to be restructured to more closely align with the Z10 structure.

This report documents this Action Plan Team's findings and recommendations to improve Reclamation's implementation of SAF P01 and ANSI Z10.

Overview of ANSI Z10

ANSI Z10 focuses on management leading continuous improvement demonstrated through a strong commitment from the top down organizationally. The program is based on the Deming Cycle and is very similar to the “Plan-Do-Check-Act” process used in the ISO 14001 Standard for Environmental Management Systems.

The five basic elements in the Z10 cycle (Figure 1) are:

- Management Leadership and Employee Participation,
- Planning,
- Implementation and Operation,
- Evaluation and Corrective Action, and
- Management Review.

Note that “Appendix H: ANSI Z10 Occupational Health and Management Systems Requirements” contains more details on this process / cycle.



Figure 1: Occupational Health and Safety Management System (OHSMS) Cycle

A well-defined policy and management commitment to the continual improvement of employee safety and health are critical to the success of the program. Involving employees in planning and implementation of an SOH program contributes to buy-in and engagement, and results in processes being developed that can be fully implemented at all organizational levels. Adjusting these processes and implementation steps is accomplished through continual monitoring and periodic program checks.

Under Z10 program guidelines, management conducts an annual review of specific program elements (Table 2) to prioritize needs and establish goals and metrics for the coming year. By reviewing Reclamation’s standards and programs and comparing them to the ANSI Z10 elements, management receives a clear picture of the system, program weaknesses can be identified for improvement, and the resulting process shifts the safety focus to long-term solutions rather than one-time fixes.

Table 2: ANSI Z10 Conformance Scorecard

Z10 Elements Used to Evaluate Reclamation Policies
1. Management Leadership
2. OHSMS Policy
3. Responsibility and Authority
4. Employee Participation
5. Review Process
6. Assessment and Prioritization
7. Objectives and Implementation Plans
8. Risk Assessment
9. Hierarchy of Controls
10. Design Review and Management of Change
11. Procurement
12. Contractors
13. Emergency Preparedness
14. Education, Training and Awareness
15. Communications
16. Document and Record Control
17. Monitoring and Measurement
18. Incident investigation
19. Audits
20. Corrective and Preventive Action
21. Feedback to the Planning Process
22. Management Review (Process, Outcome and Follow-up)

Reclamation Policy and ANSI Z10 Comparison Results

Reclamation safety documents SAF P-01, D&S SAF 1-01, and the RSHS were evaluated using the ANSI Z10 Standard Conformance Scorecard (Table 2, above) to identify gaps between the policy and the implementation directives. Appendix B provides a color-coded matrix indicating the level of conformance of each SAF product to each Z10 element.

SAF P01 does not include all the desired elements; however, its generalized terminology does allow for interpretation to be made in the accompanying implementation directive. Some of the elements are addressed in more detail in SAF 01-01 or the RSHS. But, although the RSHS is listed in policy definitions, there are no specific references to the RSHS throughout the policy narratives.

Through the analysis, it was apparent that not all Z10 elements are addressed in Reclamation's SOH policy and implementation documents:

- **SAF P01 (Appendix F)**, as Reclamation's primary SOH program policy statement (updated in 2013), does not address accountability and delegation of authority to Regional Directors, managers, or safety support personnel despite it identifying multiple levels of responsibilities. It also does not reference the RSHS. Elements pertaining to management review, prioritization of objectives, recordkeeping, audits, and contractors were not included either. However, the overall impression of the policy was that it was designed to capture the acceptance of ANSI Z10 principles, and provide the management commitment to systems thinking.
- **SAF 01-01 (Appendix G)** (1997 version updated in 2010 with only minor revisions) is the implementation instruction for the policy. The document provides very general guidance and does not address all of the Z10 elements, nor does it reference the RSHS.
- **[Reclamation Safety and Health Standards](#)** documents the minimum SOH standards for accomplishing Reclamation work. Historically, this document was designed for construction activities, and also provides instructions for Bureau contractors. RSHS provides more stringent requirements than OSHA, and details directions for assessing risk, contractor operations, hierarchy of controls, training, and emergency preparedness. However, the RSHS does not discuss a process for reviewing, providing feedback, or updating the standards themselves. This may be discussed elsewhere in the Reclamation Manual, but there is no opportunity for user input documented in the RSHS.

- [Additional SAF Directives](#) provide implementation instruction in incident investigation (SAF 01-02), motor vehicle safety (SAF 01-04), diving safety (SAF 01-05), inspection and abatement (SAF 01-06), and exposure assessment (SAF 02-01). These directives are generally up-to-date with the exception of diving safety, which was issued in 2008. The Team determined these D&Ss could easily be updated to meet the Z10 requirements, replaced by alternate standards (such as the Dive Manual), or retired.

Comparison Conclusions

The cumulative review reflects that there is an inconsistent and incomplete approach to addressing written policy and implementation.

- Responsibility is discussed in depth in the policy, SAF P01; however, accountability and authority are not adequately covered. While the RSHS is included in the SAF P01 definitions, the policy does not direct the RSHS to be used as the minimum standard. SAF P01 incorporates Z10 principles by reference, but the implementation directive (SAF 01-01) has not been updated to reflect a thoughtful corporate implementation approach for the Z10 system.
- SAF 01-01 was issued in 1997 and updated in 2010. Out of the possible 22 elements in the ANSI Z10 scorecard (Table 2), only three are discussed adequately in this implementation policy. This D&S provides only minimal guidance for the ANSI Z10 elements such as reviews, metrics, goal setting, action planning, and annual reporting. Significant gaps exist regarding expectations and provisions for employee participation and communication.
- Only about six of the 22 Z10 elements (Table 2) are addressed in the RSHS.
- There does not appear to be a pre-established structure to the SAF Directives and Standards. The topic-specific D&Ss are updated frequently, while the backbone of the implementation has not been updated since the adoption of ANSI Z10.

Implementation Perception Survey

This section provides a brief summary of the survey process and analyses that were used to assess the implementation of SAF P01 throughout Reclamation. Specific recommendations to address program weaknesses are provided in Appendix A.

In January 2014, the survey (Appendix C) to assess the implementation of SAF P01 was sent to the Reclamation Leadership Team, Area Office Managers, and a selection of Field Office/Facility Managers, supervisors, and SOH personnel. The Regional SOH Managers and RLT were offered the opportunity to further distribute the survey to others within their respective Regions. Of the 129 individuals who received a survey invitation, 91 responses were received, which equates to a response rate of nearly 71 percent.

The responses were analyzed by grouping similar responses into brackets and evaluating by percentages with similar responses to each question. The data was sorted and graphed with color-coding corresponding to response by organizational level (Appendix D). The color-coding representation enables easy visualization of areas needing improvement (shades of red) and areas of strength (shades of green). Gaps between management and safety staff responses to many survey questions were notable, as were gaps between management levels for certain survey questions.

Survey Conclusions

The responses reflected the following conclusions (Appendix E). (Strengths and Weaknesses are each listed in descending order of priority.)

Program Strengths

1. Supervisors are maintaining workplace and equipment in a safe manner.
2. Reclamation is providing a safe and healthy workplace, free of hazards.
3. Reclamation allows for continual improvement of the SOH program and program performance.
4. SOH Managers report to the Director, Regional Director, or Area Manager or to their immediate Deputy Director or Assistant Director.
5. SOH personnel are responsible for providing assistance to identify, evaluate, and address SOH hazards.

Program Weaknesses

1. SOH personnel are not adequately assisting with management processes.
2. SOH personnel are not adequately analyzing injury and illness reports and data to ensure countermeasures are developed.
3. SOH personnel are not adequately advising management and employees of SOH responsibilities.
4. SOH personnel are not adequately reviewing and monitoring compliance with policies.
5. Reclamation employees and contractors fail to recognize SOH as a core value.
6. Reclamation is not providing necessary resources and training to implement policy.
7. Reclamation is not ensuring SOH considerations are integrated into planning decisions and daily work.
8. Reclamation does not involve employees in development and implementation of the SOH program, policies and procedures.

A number of responses indicated unfamiliarity with the policy, including a lack of awareness of the qualifications of safety professionals, and of the roles and responsibilities of supervisors and the safety professionals in conducting incident investigations and identifying corrective actions.

Recommendations

The team recommends the Reclamation Leadership Team (RLT) take the following actions to help address the gaps in Reclamation's implementation of ANSI Z-10 principles:

1. To further articulate Reclamation's Safety Policy, rewrite SAF P01 to include:
 - a. A reference to the RSHS as minimum organizational standards.
 - b. Clarified roles, responsibilities, authority and accountability. With the exception of their role as inspectors, SOH personnel serve as consultants and have *presumed authority* to accomplish SOH program implementation. A safety manager or specialist who reports to the Regional Director or Area Manager has a great deal more *presumed authority* than a collateral duty safety representative who does not report directly to the site manager. Clarifying the authority of SOH personnel and the accountability of line-management will address implementation of the recommendations provided.
 - c. Documented intervals for minimum SOH D&S review and comprehensive program evaluation.
2. Re-write / clarify SAF 01-01, the implementation instruction, with references to new supplemental directives listed in Recommendation #3 below.
3. Develop supplemental D&Ss to address the gaps with ANSI Z10 principles that address:
 - a. Employee participation (Z10, Section 3.2): safety committees, recognition, incentive, and/or safety awards guidance.
 - b. Planning (Z10, Section 4.0): action plans, prioritization, objectives, metrics, and funding resources.
 - c. Implementation & Operations (Z10, Section 5.0): procurement processes, hazard assessments, etc. that can be developed based on prioritization.
 - d. Evaluation and Corrections (Z10, Section 6.0).
 - e. Management Review.
4. Streamline implementation efforts (including those developed by the 21 Safety Action Teams) within existing processes and internal controls where practical. (For example, incorporate or parallel the processes used in the Sustainable Environmental Management System to conduct periodic reviews, or the recommendations provided by the Procurement Action Team to conduct safety reviews prior to procurement of hazardous materials or equipment.)
5. In the short term, implement the recommendations provided (See Appendix A) to resolve the gaps in the perception survey, improve communication, and clarify expectations.

Conclusion

Team #2's review of SAF P01 and the associated implementation perception survey verified the DOI's finding that there is a lack of accountability in implementing the Reclamation SOH Program and a significant lack of knowledge of Z-10 principles.

The review of SAF P01 and the perception survey responses demonstrate that there is no common understanding of SOH roles, responsibilities, and authorities. A lack of clarity in communicating expectations of line-management, SOH staff, and collateral duty safety representatives has resulted in incomplete accountability for program implementation. This indicates that the issuance of the revised SAF P01 policy in 2013 may not have been communicated adequately to all levels of the organization. Additionally, many of the weaknesses identified indicated a lack of understanding of the responsibilities of the safety staff, and only limited involvement of safety professionals in organizational processes.

According to the 2014 Federal Employee Viewpoint Survey, most survey respondents feel safe in the workplace; however, more than 56% did not feel free from reprisal if they were to report an illegal activity. In the context of safety, it is likely that an employee who is hesitant to report illegal activity would also not be comfortable reporting a safety issue. It is possible that employee would be concerned there would be a backlash from a supervisor or a co-worker, and would continue to accept the unsafe condition or practice. This is also consistent with the DOI finding that safety has not been established as a core value within Reclamation.

Sixteen of Reclamation's 21 Safety Action Teams have Z10 principles identified in their deliverables. By integrating those Teams' recommendations into a comprehensive series of D&Ss that reflect ANSI Z10 standards and processes, Reclamation can establish a well-implemented safety management system that builds – and sustains – a thriving, safety-minded culture throughout Reclamation.

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**Appendix A:
Survey Analysis and Short-Term
Recommendations**

Survey Analysis and Short-Term Recommendations

In January 2014, Reclamation's Safety Action Team #2 distributed a survey (Appendix C) to five focus groups:

1. all members of the RLT,
2. all Reclamation Area Office Managers,
3. most Field Office/Facility Managers,
4. a random sampling of supervisors, and
5. all SOH personnel.

The Regional SOH managers and RLT were offered the opportunity to further distribute the survey to others within their Regions. Some forwarded the survey and gathered additional responses from facility managers and supervisors.

Of the 129 individuals who received a survey invitation, 91 responses were received, which equates to a response rate of nearly 71 percent. (Note: Management responses were initially lacking from one Region, so the survey was re-sent to managers in that Region. After the second survey offering, only one management response was received.) The complexities of survey approval requirements and the bargaining unit process were instrumental in the Team's decision to primarily survey Reclamation management and safety staff. The responses from these groups could be obtained in a timely manner and would be more reflective of the organizational culture, and therefore, would be a more accurate indicator of actual policy implementation. Furthermore, another Action Team was tasked to survey the general employee population as part of its efforts.

The responses were analyzed by a number of methods to determine the best way of viewing and interpreting the data. The optimal representation was by grouping similar responses to each question and evaluating the resulting percentages.

The results from the survey were compiled and sorted to offer a quick visual identification of key areas: the data was bracketed based on the percentage of responses to each question, and then as plotted by color-coding with emerald green for responses indicating "World Class" to yellow for moderate, and red for "Does Not Meet." Data was filtered and/or sorted by responses from the five focus groups, and by Region or geographical area in order to discern patterns in the data. The color-coding of responses made it possible to visualize areas needing improvement (shades of red) and areas of strength (shades of green).

Further review of the response plots indicated a significant gap between management and safety staff responses. Management (RLT, Area Office Managers, Field Office/Facility Managers and supervisors) results were combined into one collective group and the Safety staff responses were grouped separately; the responses of these two groupings were then compared. Finally, the Team combined the results from all five focus groups surveyed and evaluated those as well.

Analysis and Findings

After the data were reviewed for all five focus groups, the Team then developed a Tiered Prioritization Test to identify areas needing improvement or the existing best practices based on whether the question was seen as a high, medium, or low priority for resolution. The rationalization behind this concept was that not all questions are weighted equally in regard to manifesting a change or improvement in either the safety of employees or to Reclamation's organizational culture.

Table A1: Tiered Prioritization Test

Priority Levels	Total Response Rate
Tier 1: High	≤ 34.9 percent
Tier 2: Medium	Between 55 and 69.9 percent
Tier 3: Low	≥ 70 percent

The Team discussed and compared the priorities with the response percentages, and identified eight questions/areas in which the cumulative survey responses reflected a need for improvement and five questions/areas reflecting programmatic strengths. These areas were identified by “natural” gaps observed in the data, and by collaborative agreement based on the response percentages.

Identified Focus Areas (Areas Needing Improvement)

Based on the individual priority assessments, the eight areas that needed improvement were identified as Tier 1: High Priorities. They are listed below in descending order of priority¹:

1. SOH personnel are not adequately assisting with management processes².
2. SOH personnel are not adequately analyzing injury and illness reports and data to ensure countermeasures are developed³.
3. SOH personnel are not adequately advising management and employees of SOH responsibilities⁴.
4. SOH personnel are not adequately reviewing and monitoring compliance with policies⁵.

¹ Note that the percentages in the following footnotes indicate the level of agreement that Reclamation is meeting the requirements; thus, the higher the percentage, the more indicative that Reclamation is performing well.

² Question 11 – The collective group responded with 34%, SOH personnel with 43%, total response was 38%.

³ Question 15 – The collective group responded with 44%, SOH personnel with 49%, total response was 47%.

⁴ Question 12 – The collective group responded with 47%, SOH personnel with 54%, total response was 49%.

⁵ Question 16 – The collective group responded with 59%, SOH personnel with 49%, total response was 54%.

5. Z-10 Principle: Reclamation employees and contractors fail to recognize SOH as a core value⁶.
6. Z-10 Principle: Reclamation is not providing necessary resources and training to implement policy⁷.
7. Z-10 Principle: Reclamation is not ensuring SOH considerations and integrated in planning decision and daily work⁸.
8. Z-10 Principle: Reclamation does not involve employees in development and implementation of the SOH program, policies and procedures⁹.

Identified Strengths (Best Practices)

Based on the individual priority assessments, five areas were identified as agency strengths. These strengths were considered best practices and are listed below descending order of priority:

1. Supervisors are maintaining workplace and equipment in a safe manner¹⁰.
2. Z-10 Principle: Reclamation is providing a safe and healthy workplace, free of hazards¹¹.
3. Z-10 Principle: Reclamation allows for continual improvement of SOH program and program performance¹².
4. SOH managers report to the Director, Regional Director, or Area Manager or to their immediate Deputy Director or Assistant Director¹³.
5. SOH personnel are responsible for providing assistance to identify, evaluate and address SOH hazards¹⁴.

⁶ Question 17 – The collective group responded with 60%, SOH personnel with 32%, total response was 48%.

⁷ Question 23 – The collective group responded with 65%, SOH personnel with 49%, total response was 58%.

⁸ Question 21 – The collective group responded with 68%, SOH personnel with 41%, total response was 54%.

⁹ Question 22 – The collective group responded with 69%, SOH personnel with 32%, total combined response was 52%.

¹⁰ Question 5 – The collective group responded with 87%, SOH personnel with 59%, total combined response was 73%.

¹¹ Question 18 – The collective group responded with 87%, SOH personnel with 49%, total combined response was 69%.

¹² Question 19 – The collective group responded with 81%, SOH personnel with 43%, total combined response was 63%.

¹³ Question 27 – The collective group responded with 77%, SOH personnel with 65%, total combined response was 69%.

¹⁴ Question 13 – The collective group responded with 68%, SOH personnel with 59%, total combined response was 64%.

Disparities/Anomalies

When reviewing some other questions from the survey, there were a few disparities/anomalies as identified below:

Question 25 – *Employ certified professionals as the senior manager to recommend policy and guidance at the Commissioner’s Office and Regional Offices; and*

Question 26 – *Encourage all safety professionals to attain credentials*

These two questions received the “I Don’t Know” response three times more than that of all other question(s) in the survey. This could potentially be an area in which to provide future education/training; however, because both questions address SOH staffs’ professional credentials, it was agreed these questions were not a priority at this time. Credentials of SOH personnel are not necessarily marketed throughout Reclamation and most employees may not be familiar with specific SOH professional qualifications, even though SOH personnel do attain and maintain their credentials.

In addition, when analyzing Question 6 – *Conducting investigations, identifying factors, corrective actions and implementation*, the combined survey responses resulted in a highly favorable rating; however, SOH personnel gave this question the lowest rating out of all the questions (24 percent). Upon further discussion, the Team determined that SOH personnel were concerned that supervisors may complete investigations in a “pro forma” manner which could lead to missed opportunities in preventing future incidents. Frequently, the information in the DOI Safety Management Information System is insufficient to make valid recommendations. The responsibility for investigating incidents is that of the supervisor. With the exception of incidents involving significant injury or property damage, the safety staff would not investigate most incidents, but will provide assistance when requested. The current process does not lend itself to active participation of the safety staff, and many supervisors have not been trained in incident investigation techniques.

Recommended Resolutions (FOR SURVEY ONLY)

The Team completed the review of the survey, prioritized the areas for improvement (focus areas) and best practices (strengths), and developed possible resolutions for improving implementation of Z-10 and bridging the gaps between management and safety staff responses.

Because it appears that there is a clear lack of mutual understanding of the roles and responsibilities at various levels of the organization, the following recommendations address three focus areas relating to the roles and responsibilities of Safety and Occupational Health managers:

- a) Clarify the language in policies regarding the roles and responsibilities, accountability, and safety hierarchy of employees, supervisors, managers, and safety staff.

- b) Clarify and communicate the SOH roles in Denver, Region and Area Offices, and for Collateral Duty Safety Representatives. Develop site-specific processes / procedures to identify SOH professional roles to establish accountability.
- c) Educate supervisors and managers about their personal and SOH professionals' roles and responsibilities during the Managing Employee Safety & Health (MESH) training.
- d) Provide short briefings and discussion on roles, accountability, and authorities during RLT/RMT meetings.
- e) Employ a marketing blitz (via PIO messaging) to describe SOH staff support services and expertise.
- f) Develop Reclamation "corporate" training for safety staff on interpersonal skills to improve and increase communication and collaboration with managers and supervisors.

Additional recommendations are provided for the individual questions as follow:

1) Question 11 – SOH Personnel: Assist with management process

- a) Identify management processes that would benefit from having safety input in the early planning stages or as a stage of development. An example of such a process is "Safety In Design" (Team #20) that includes safety considerations in the design-build stages in order to design-out hazards early in the process, as opposed to relying on PPE or other measures (i.e., ladders) later.

2) Question 15 – SOH personnel: Analyze injury and illness reports and data to ensure countermeasures are developed

- a) Review and evaluate trends at the Reclamation-level. The small number of incidents within a Region or Area Office jurisdiction makes it difficult to identify a trend, so this corporate-level method would be most effective.
- b) Re-evaluate the investigation process to include safety in a more timely fashion for lost-time and 'near-miss' incidents. This would allow for improved safety input into the investigation to better identify causal factors and mitigating actions.

3) Question 12 – SOH Personnel: Advise management and employees of SOH responsibilities

- a) Clarify the basic program policies to convey who has accountability and the authority to complete specific actions.
- b) Include discussion of safety roles, responsibilities, accountability, and authority at all levels.
- c) Timeframes for discussion could include employees at new employee orientation, supervisors during MESH training, and managers and RLT during their quarterly meetings.
- d) Include managers in the complete MESH training.

- e) Provide Reclamation orientation for new safety representatives to ensure complete understanding of roles, responsibilities (expectations), accountability, and authorities of each respective position in the organization.

4) Question 16 – SOH Personnel: Review and monitor compliance with policies

- a) Establish a process to review incident and near miss reports at least quarterly with the facility, Area Office, and/or Regional Management Team with the intent of discussing incident trends and communicating observations.
- b) Establish a process through which SOH personnel collaborate with management and employees or their representatives in the conduct of annual and/or periodic reviews of lockout procedures, confined space procedures, personal protective equipment program, etc. This will make these procedures more meaningful, and will allow for information and educational exchange during the improvement process.
- c) Require each organizational entity to maintain a tracking system or process to ensure training and medical monitoring reflect current information.
- d) A comprehensive list of minimum required SOH Program documents and the required review intervals should be developed and regularly reviewed for improvements, with both employee and supervisor input.
- e) Include compliance with SOH regulations as a critical element in performance evaluations of employees, supervisors and management. In this regard, develop a process for documenting unsafe and safe behaviors.
- f) Continue conducting facilitated sessions. Include informal conversations with employees, union representatives, and supervisors to solicit recommendations for where improvements are needed, where compliance is difficult to achieve, an understanding of safety expectations, the effectiveness of training, etc.

6) Question 21 - ANSI: Provide necessary resources and training to implement policy

- a) Survey Safety Professionals, Safety Leads, Collateral Duty Safety Representatives, and Supervisors to determine specific (i) training and (ii) resource needs and shortfalls.
- b) Training: Create a database to track required training by job classification and activity, and to provide reminders to supervisors as to when refreshers are needed.
- c) Training: Coordinate training needs through Training Officers to improve the quality of the training, and contract for multi-site training from the same provider.
- d) Resource: Evaluate needed resources, and when possible create a master contract to take advantage of bulk pricing.
- e) Resource: Create periodic maintenance work orders to better manage human resource workload, schedule calibration, and inspections.
- f) Resource: Develop a strategic plan to project programmatic needs for new or replacement equipment, and to establish the need for increased staffing to support routine operations.

7) Question 21 - ANSI: Ensure SOH considerations are integrated in planning decision, and daily work

- a) Create a process that includes SOH through the design, procurement, and construction phases of project work.
- b) Improve communication of Reclamation directives and goals to the workforce, which may include periodic visitation to offices and/or facilities to discuss and reiterate these goals.
- c) Assign rotational 'Safety Lead' for first-line supervisors or workers to help ensure team safety considerations are addressed, including discussing with workers or supervisors observed unsafe behaviors, unaddressed hazards, procedural discrepancies, and/or close calls. Have the Safety Leads meet with SOH representatives routinely to discuss and resolve issues.
- d) Institute minimum SOH representative presence at industrial facilities to improve the working relationships and to ensure communication, collaboration and integration into forecasted projects and to resolve issues in a timely fashion.

8) Question 22 - ANSI: Involve employees in development and implementation of the SOH program, policies, procedures

- a) Institute safety inspections prior to a scheduled safety/staff meeting in which two or more employees are assigned to conduct a safety inspection of a specified office area. The findings are discussed at the safety meeting and an employee is tasked with resolving the finding(s).
- b) Include safety representatives in the agenda for the monthly "all-hands" meetings to discuss safety-related issues and present educational information.
- c) Motivate employees through recognition and awards. Include consideration of Team #6's Safety Incentive Program to engage employees, and offer incentives for suggestions that eliminate hazards or reduce risk of injury.
- d) Include safety performance actions as an element on performance plans.
- e) Include safety committee approval in the process for approval of programmatic guidance and office procedures.
- f) Job Hazard Analyses (JHAs) should be developed by the employee closest to the job, and all affected employees and the supervisor should be offered an opportunity to provide input.
- g) Supervisors could engage employees in discussions of job hazards, barriers to accomplishing tasks, and employee suggestions for improving health and safety procedures relating to their duties.

**Appendix B:
Conformance Scorecard – ANSI Z10 Elements
Compared with Reclamation SAF Products**

ANSI Z10 Conformance Scorecard with Reclamation SAF Products

5.00	World Class Performance
4.00	Strong. Conforming/May have minor gaps
3.00	Moderate. Scattered Non- Conformances, positive trends/major elements in place
2.00	Significant non-conformance exist, still needs focus
1.00	Major Effort required, major or systemic non-conformance exist

ANSI Z10: OHSMS Conformance Scorecard	SAF P01, SOH Policy	SAF 01-01, Implementation	Reclamation Safety and Health Standards	Average Score
Management Leadership - OHSMS (3.1)	5.00 Includes RSHS in definitions, but does not reference afterwards	3.00 No transfer of authority, responsibilities listed	5.00 Forward	4.33 Clarify delegation of authority; Team #1 may have recommendations related to this
OHSMS Policy (3.1.2)	5.00 REC: Reference RSHS as "minimum Reclamation Standards" in the Policy. This will incorporate a lot of the ANSI Z10 elements	3.00 Missing: Protection and continual improvement of employee health and safety and Employee participation	5.00 Forward	4.33 Reference RSHS in Policy. State need for continual improvement throughout all D&S
Responsibility and Authority (3.1.3)	3.00 Authority has not been delegated to RD, Safety, Mgrs	4.00 Generic language for resources; Not split out sufficiently - "Managers, Supervisors, and Leaders" are a grouping; REC: add employee participation and accomplish training	3.00 Authority is clear; Responsibility is not mentioned other than as a "general duty"	3.33 Clarify delegation of authority - roles of Safety staff including Collateral Safety
Employee Participation (3.2)	5.00	1.00 Reference to language from 485 DM safety committees; no other mention of employee involvement	1.00 References to input during job planning	2.33 Need specific guidance on employee participation & safety committees; Team #6 may have recommendations to increase participation
Review Process (4.0, 4.1)	2.00 Does not speak to specifically, "review & monitoring compliance"	2.00 2010 version has not been revised to conform to ANSI Z10 format; 5B(11) Program Accountability element but not process; REC: Develop D&S Planning (4.0) to be consistent with ANSI Z10. Current 01-01 has Section 5A, Implementation - Goals, Action, Annual Reports	1.00 No discussion of process used to review RSHS; Reads as a stand-alone document	1.67 Lacks process, guidance for review and monitoring of compliance. REC: Develop D&S Planning (4.0) to be consistent with ANSI Z10. Current 01-01 has Section 5A, Implementation - Goals, Action, Annual Reports
Assessment and prioritization (critical) (4.2)	1.00 No specific language to address prioritizing	3.00 Workplace hazard analysis, program documents, and JHA - very non-specific no discussion of prioritization methodology	0.00	1.33 Workplace hazard analysis, program documents, and JHA - non-specific no discussion of prioritization methodology
Objectives and implementation plans (5.0)	1.00	4.00 2010 version has not been revised to conform to ANSI Z10 format; Goals - Must have annual goals, no metrics discussed, no format described	0.00	1.67 Directive 01-01 does not conform to ANSI Z10
Risk Assessment (5.1.1)	1.00	4.00 Workplace hazard analysis and JHA - generic requirement	5.00 JHA Improved, Team #9	3.33
Hierarchy of Controls (5.1.2)	1.00	1.00 If RSHS were referenced, this would be met	5.00 New Section, Team #21	2.33
Design Review and Management of Change (5.1.3)	2.00 References processes, not specific to change	2.00 5B references design standards, but does not establish process for safety to be involved. The safety design standards no longer exist	2.00 Team #20, will not address management of change	2.00 Team #20, most likely will not address management of change
Procurement (5.1.4)	2.00 References processes, not specific to change	1.00 Missing in document	1.00 Requirement to have JHA to purchase JHA is seen as onerous; Team #10	1.33 Need guidance; Team #10
Contractors (5.1.5)	1.00	3.00 If RSHS were referenced, this would be met; Responsibility SSLE 4A(5)	5.00	3.00 Reference RSHS in Policy and implementation
Emergency Preparedness (5.1.6)	1.00	1.00 If RSHS were referenced, this would be met	5.00	2.33 Reference RSHS in Policy and implementation
Education, training and Awareness (5.2)	5.00	4.00 Orientation and per needs	5.00	4.67 Policy statements; Survey results indicate lack of training on policy and implementation
Communications (5.3)	5.00	1.00 No discussion	1.00	2.33 Need guidance; Team #4; See survey results
Document and record control process (5.4)	1.00	1.00 No discussion	4.00 Guidance for most sections for field documents, but not for administrative policy and program review records	2.00 Need guidance; This may be included elsewhere in Reclamation guidance, but may need to be referenced
Monitoring and measurement (6.1)	4.00	3.00 5B(11) Program Accountability	4.00 Minimum on inspections; assessment in Section 7	3.67 States a program to be developed, no additional guidance
Incident investigation (6.2)	5.00	3.00 5B(6) Accident Reporting - non-specific guidance	4.00 Does not refer back to D&S where specific guidance is provided	4.00 Addressed in SAF 01-02; Need to reference SAF 01-02
Audits (6.3)	3.00 H(1) could be strengthened to address objectives and audits	3.00 SSLE 4A(2) - "periodic evaluations" Generic	1.00	2.33 Need guidance on audit process, expectations
Corrective and Preventive Action (6.4)	4.00 Listed as responsibility of supervisors, safety. Not listed as policy	3.00 Responsibility - C and D, no tracking	1.00	2.67 Addressed in SAF 01-06; Need to reference SAF 01-02; No provision for tracking incident recommendations; Team #12
Feedback to the planning process (6.5)	5.00	0.00 No discussion	1.00 No discussion of how to report issues with RSHS or make suggestions. Need to add to document	2.00 Policy includes this in employee involvement, but in not other place are employees included in participation
Management Review (Process, Outcome and follow up) (7.1, 7.2)	3.00 No language to address upper management review or outcomes	3.00 Annual Report, no specifics	1.00 No discussion of review or revision process in RSHS	2.33 Policy and implementation are non-specific. Need guidance
Last Update	5.00 7/2013	1.00 Minor revisions 1/2010; 11/1997 previous	4.00 2009, updates ongoing	3.33 Implementation D&S needs to be redone to match Z10

Appendix C: Survey Questions



Smith, Juli <jasmith@usbr.gov>

SAF P01 GAP Analysis Survey

jasmith@usbr.gov <jasmith@usbr.gov>
To: jasmith@usbr.gov

Fri, Feb 13, 2015 at 7:51 PM

All, this survey has been approved for distribution per the Reclamation Action Team procedures. We appreciate your assistance in our initial assessment of D&S SAF P-01 implementation by your submission of this survey for Team #2. We request this be completed by March 1.

Note for RLТ: The distribution was derived from the intranet, and intended to target Directors, Area Managers, Field Office Managers, and safety professionals. If you believe we've not included someone you believe should have been included, please forward. If you would like to survey further into your office, we've included a response category for supervisors that may be used at your discretion.

If you have trouble viewing or submitting this form, you can fill it out online.

SAF P01 GAP Analysis Survey

Use this form to rate the implementation of SAF P01 in your area of responsibility. The headings correspond to the policy, beginning with Section 4 Responsibilities. See the policy for complete details:
<http://www.usbr.gov/recman/saf/saf-p01.pdf>

* Required

The first three questions are for demographic purposes. *

i. In what capacity are you responding?

- RLT Member, Director, or Senior Manager
- Area Office Manager
- Field Office/Facility Manager
- Supervisor
- Safety Professional
- Other:

ii. For what Region are you providing a response? *

- Mid-Pacific Region
- Upper Colorado Region
- Lower Colorado Region
- Pacific Northwest Region
- Great Plains Region
- Denver Based Offices
- Other:

SAF P01 GAP Analysis Survey

Use this form to rate the implementation of SAF P01 in your area of responsibility. The headings correspond to the policy, beginning with Section 4 Responsibilities. See the policy for complete details: <http://www.usbr.gov/recman/saf/saf-p01.pdf>

* Required

1. **The first three questions are for demographic purposes. ***

i. In what capacity are you responding?

Mark only one oval.

- Area Office Manager
- Field Office Manager
- Safety Professional
- Other: _____

2. **ii. For what Region are you providing a response? ***

Mark only one oval.

- Mid-Pacific Region *Skip to question 8.*
- Upper Colorado Region *Skip to question 7.*
- Lower Colorado Region *Skip to question 6.*
- Pacific Northwest Region *Skip to question 4.*
- Great Plains Region *Skip to question 5.*
- Denver Based Offices *Skip to question 3.*
- Other: _____

Denver Based Offices

3. For what Office are you providing a response?

Mark only one oval.

- Technical Services Center *Skip to question 9.*
- Research & Development *Skip to question 9.*
- Management Services *Skip to question 9.*
- Human Resources *Skip to question 9.*
- Hydropower/Electric Reliability *Skip to question 9.*
- SSLE *Skip to question 9.*
- Policy & Administration *Skip to question 9.*
- Chief Information Office *Skip to question 9.*
- DEC/DSO *Skip to question 9.*
- Other: *Skip to question 9.*

Pacific Northwest Region

4. For what Office are you providing a response?

Mark only one oval.

- Columbia-Cascades Area Office *Skip to question 9.*
- Grand Coulee Power Office *Skip to question 9.*
- Snake River Area Office *Skip to question 9.*
- Other:

Great Plains Region

5. For what Office are you providing a response?

Mark only one oval.

- GP Regional Office *Skip to question 9.*
- Montana Area Office *Skip to question 9.*
- Nebraska-Kansas Area Office *Skip to question 9.*
- Eastern Colorado Area Office *Skip to question 9.*
- Wyoming Area Office *Skip to question 9.*
- Oklahoma-Texas Area Office *Skip to question 9.*
- Dakotas Area Office *Skip to question 9.*
- Other: *Start this form over.*

Lower Colorado Region

6. For what Office are you providing a response?

Mark only one oval.

- LC Regional Office Skip to question 9.
- Lower Colorado Dams Office Skip to question 9.
- Boulder Canyon Operations Office Skip to question 9.
- Phoenix Area Office Skip to question 9.
- Yuma Area Office Skip to question 9.
- BCOO, Blythe Field Office Skip to question 9.
- Other: _____ Skip to question 9.

Upper Colorado Region

7. For what Area Office are you providing a response?

Mark only one oval.

- UC Regional Office Skip to question 9.
- Albuquerque Skip to question 9.
- Wester Colorado Skip to question 9.
- Provo Skip to question 9.
- Four Corners Consturction Skip to question 9.
- Power Office Skip to question 9.
- Other: _____ Skip to question 9.

Mid-Pacific Region Area Offices

8. For what Area Office are you responding?

Mark only one oval.

- MP Regional Office Skip to question 9.
- Klamath Basin Skip to question 9.
- Lahontan Skip to question 9.
- Northern California Skip to question 9.
- South-Central California Skip to question 9.
- Central Valley Operations Skip to question 9.
- Bay-Delta Skip to question 9.
- MP Construction Skip to question 9.
- Other: _____ Skip to question 9.

Section 4E. Responsibilities

9. Responsibilities - Directors Regional Directors, Managers are fulfilling their responsibilities: *

1. Communicating & Implementing SOH Requirements

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

10. *

2. Ensuring compliance and training.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Does not meet
- Don't know
- Other:

11. *

3. Ensuring mechanisms are in place to incorporate SOH into operations and work processes

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

Section 4F. Responsibilities.

12. **Supervisors are responsible for:** *

4. Implementing SOH Program

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

13. *

5. Maintaining workplace & equipment in a safe, healthful, and compliant manner

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

14. *

6. Conducting investigations, identifying factors, corrective actions and ensuring actions are implemented.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

15. *

7. Meeting SOH needs e.g. engineering controls, training, and PPE
Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

Section 4G. Employee Accountability

16. **Employees are held accountable/responsible for:** *

8. Complying with Reclamation and other required SOH Standards
Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

17. *

9. Complete SOH training
Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

18. *

10. Report SOH hazards/unsafe conditions to supervisors/managers.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

Section 4H. SOH Personnel Responsibilities

19. **SOH Personnel are responsible for:** *

11. Assist w/Management Process (Z-10)

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

20. *

12. Advise Management and employees of SOH responsibilities.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

21. *

13. Provide Assistance to identify, evaluate, and address SOH hazards.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

22. *

14. Provide guidance for training and assistance to help employees perform work safely.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

23. *

15. Analyze injury and illness reports and data to ensure that countermeasures are developed to prevent future injuries.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

24. *

16. Review and monitor compliance with regulatory and organizational SOH policies.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does Not meet
- Don't know
- Other:

Section 5A. ANSI Z10 Implementation

25. **The Reclamation SOH Program is implemented using the principles of ANSI Z10 as exhibited by:** *

17. Reclamation employees and contractors recognizing SOH as a CORE VALUE.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

26. *

18. Reclamation providing a safe and healthful workplace, free of hazards for employees, contractors, and visitors.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

27. *

19. Continual improvement of it SOH Program and the Program's performance.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

28. *

20. Compliance with both the spirit and the letter of SOH laws and regulations including Department and Reclamation SOH requirements.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

29. *

21. Ensure that SOH considerations are integrated into organizational planning, decision making, and daily work activities.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

30. *

22. Involve employees and their representatives in the development and implementation of the SOH Program's processes, plans, and procedures in their workplaces.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

31. *

23. Provide necessary resources and training needed to implement this policy.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

32. *

24. Communicate this policy to employees and other affected parties.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

Section 5B. Employment of SOH Professionals

33. **Employ Certified Professionals (CSP, CIH, PE, or master's SOH) as the senior manager to recommend policy and guidance at the Commissioner's Office and Regional Offices. ***

25.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

34. *

26. Encourage all safety professionals to attain credentials.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

Section 5C. Reporting Structure

35. **SOH managers report to the Director, Regional Director, or Area Manager or to their immediate Deputy or Assistant. ***

27.

Mark only one oval.

- World Class
- Strong w/minor gaps
- Moderate
- Significant gaps
- Does not meet
- Don't know
- Other:

**Appendix D:
Survey Response Breakdown by Position**

**Appendix E:
Survey-Identified Strengths and Weaknesses**

SAFETY TEAM 2 - ANSI Z10

Focused

RLT	Area Office Manager	Field Office/Facility Manager	Supervisor	Collective	Safety	Collective Including Safety
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"World Class"
"Strong w/ Minor Gaps"

***The figures below display the percentage of the responses which answered "World Class" or "Strong w/ Minor Gaps" for each question.

< 34.9% Dk Red , 35- 54.9% Lt Red , 55-69.9% Yellow , 70-84.9% Lt Green , > 85% Dk Green

Top 8 Identified Areas of Improvement

11	H	SOH Personnel are responsible for: Assist w/ Management process	27%	50%	27%	31%	34%	43%	38%
15	H	SOH personnel: Analyze injury and illness reports and data to ensure countermeasures are developed	45%	58%	27%	46%	44%	49%	47%
12	H	SOH Personnel are responsible for: Advise mgmt and employees of SOH responsibilities	27%	58%	55%	46%	47%	54%	49%
16	H	SOH to Review and monitor compliance with policies	55%	75%	55%	54%	59%	49%	54%
17	H	5A. ANSI Recognition SOH as a core value	36%	75%	45%	85%	60%	32%	48%
23	H	ANSI: Provide necessary resources and training to implement policy	45%	75%	64%	77%	65%	49%	58%
21	H	ANSI: Ensure SOH considerations are integrated in planning decision, and daily work	55%	58%	82%	77%	68%	41%	54%
22	H	ANSI: Involve employees in development and implementation of the SOH program, policies, procedures	64%	75%	82%	54%	69%	32%	52%

Top 5 Areas of Strength

5	H	Supvsr: Maintaining workplace & equipment in safe manner	91%	75%	91%	92%	87%	59%	73%
18	M	ANSI: Reclamation providing a safe and health wrokplace, free of hazards	82%	75%	91%	100%	87%	49%	69%
19	M	ANSI: Continual improvement of SOH Program and program performance	64%	92%	91%	77%	81%	43%	63%
27	L	SOH managers report to the Director, Regional Director, or Area Manager or to their immediate Deputy or Assistant.	91%	83%	73%	62%	77%	65%	69%
13	M	SOH personnel are responsible for: Provide assistance to identify evaluate and address SOH hazards	73%	67%	73%	62%	68%	59%	64%

Percentage of Respondents Who Answered "World Class" or "Strong w/ Minor Gaps"

"World Class" "Strong w/ Minor Gaps"		High Level						
		RLT	Area Office Manager	Field Office/Facility Manager	Supervisor	Collective	Safety	Collective Including Safety
<p>***The figures below display the percentage of the responses which answered "World Class" or "Strong w/ Minor Gaps" for each question.</p> <p style="text-align: center;">< 34.9% Dk Red , 35- 54.9% Lt Red , 55-69.9% Yellow , 70-84.9% Lt Green , > 85% Dk Green</p>								
1	Responsibilities - Directors Regional Directors, Managers are fulfilling their responsibilities: Communicating and Implementing SOH requirements	55%	67%	82%	85%	72%	41%	57%
2	4E.RLT, AO Mgrs: Responsibilities Ensuring compliance and training	45%	83%	82%	92%	76%	35%	57%
3	4E.RLT, AO Mgrs: Responsibilities. Ensuring mechanisms are in place to incorporate SOH into operations and work processes	55%	83%	73%	77%	72%	32%	52%
4	Supervisors are responsible for: Implementing SOH Program	36%	75%	73%	85%	67%	30%	51%
5	Supvsr: Maintaining workplace & equipment in safe manner	91%	75%	91%	92%	87%	59%	73%
6	Supvsr: Conducting investigations, id factors, corrective actions, implementation	73%	67%	73%	69%	70%	24%	51%
7	Supvsr: Meeting SOH needs i.e engineering controls, training, PPE	36%	83%	91%	92%	76%	43%	61%
8	Employees are held accountable/responsible for: Complying with REC SOH requirements	73%	50%	82%	92%	74%	41%	59%
9	Employees are accountable for: Completing SOH training	45%	75%	73%	85%	69%	59%	63%
10	Employees are accountables for : Reporting SOH hazards/unsafe conditions to Sup	36%	67%	82%	77%	65%	49%	58%
11	SOH Personnel are responsible for: Assist w/ Management process	27%	50%	27%	31%	34%	43%	38%
12	SOH Personnel are responsible for: Advise mgmt and employees of SOH responsibilities	27%	58%	55%	46%	47%	54%	49%
13	SOH personnel are responsible for: Provide assistance to identify evaluate and address SOH hazards	73%	67%	73%	62%	68%	59%	64%
14	SOH personnel are responsible for: provide guidance for training and assistance to hep employees perform work safely	55%	75%	73%	62%	66%	59%	63%
15	SOH personnel: Analyze injury and illness reports and data to ensure countermeasures are developed	45%	58%	27%	46%	44%	49%	47%
16	SOH to Review and monitor compliance with policies	55%	75%	55%	54%	59%	49%	54%
17	5A. ANSI Recognition SOH as a core value	36%	75%	45%	85%	60%	32%	48%
18	ANSI: Reclamation providing a safe and health wrokplace, free of hazards	82%	75%	91%	100%	87%	49%	69%
19	ANSI: Continual improvement of SOH Program and program performance	64%	92%	91%	77%	81%	43%	63%
20	ANSI: Compliance with SOH regs	55%	75%	73%	69%	68%	32%	52%
21	ANSI: Ensure SOH considerations are integrated in planning decision, and daily work	55%	58%	82%	77%	68%	41%	54%
22	ANSI: Involve employees in development and implementation of the SOH program, policies, procedures	64%	75%	82%	54%	69%	32%	52%
23	ANSI: Provide necessary resources and training to implement policy	45%	75%	64%	77%	65%	49%	58%
24	ANSI: Communicate the policy to employees and affected parties	45%	75%	91%	69%	70%	49%	59%
25	Employ Certified Professionals (CSP, CIH, PE, or master's SOH) as the senior manager to recommend policy and guidance at the Commissioner's Office and Regional Offices.	45%	42%	36%	15%	35%	46%	38%
26	Encourage all safety professional to attain credentials	45%	42%	27%	15%	32%	38%	33%
27	SOH managers report to the Director, Regional Director, or Area Manager or to their immediate Deputy or Assistant.	91%	83%	73%	62%	77%	65%	69%
Average Percentage of All Reponses =		53.87%	69.44%	69.02%	68.38%	65.18%	44.54%	55.31%

Percentage of Respondents Who Answered "World Class" or "Strong w/ Minor Gaps"

"World Class" "Strong w/ Minor Gaps"		<i>Focused</i>						
		RLT	Area Office Manager	Field Office/Facility Manager	Supervisor	Collective	Safety	Collective Including Safety
<i>***The figures below display the percentage of the responses which answered "World Class" or "Strong w/ Minor Gaps" for each question.</i>								
< 34.9% Dk Red , 35- 54.9% Lt Red , 55-69.9% Yellow , 70-84.9% Lt Green , > 85% Dk Green								
1	Responsibilities - Directors Regional Directors, Managers are fulfilling their responsibilities: Communicating and Implementing SOH requirements	55%	67%	82%	85%	72%	41%	57%
2	4E.RLT, AO Mgrs: Responsibilities Ensuring compliance and training	45%	83%	82%	92%	76%	35%	57%
3	4E.RLT, AO Mgrs: Responsibilities. Ensuring mechanisms are in place to incorporate SOH into operations and work processes	55%	83%	73%	77%	72%	32%	52%
4	Supervisors are responsible for: Implementing SOH Program	36%	75%	73%	85%	67%	30%	51%
5	Supvsr: Maintaining workplace & equipment in safe manner	91%	75%	91%	92%	87%	59%	73%
6	Supvsr: Conducting investigations, id factors, corrective actions, implementation	73%	67%	73%	69%	70%	24%	51%
7	Supvsr: Meeting SOH needs i.e engineering controls, training, PPE	36%	83%	91%	92%	76%	43%	61%
8	Employees are held accountable/responsible for:Complying with REC SOH requirements	73%	50%	82%	92%	74%	41%	59%
9	Employees are accountable for: Completing SOH training	45%	75%	73%	85%	69%	59%	63%
10	Employees are accountables for : Reporting SOH hazards/unsafe conditions to Sup	36%	67%	82%	77%	65%	49%	58%
11	SOH Personnel are responsible for: Assist w/ Management process	27%	50%	27%	31%	34%	43%	38%
12	SOH Personnel are responsible for: Advise mgmt and employees of SOH responsibilities	27%	58%	55%	46%	47%	54%	49%
13	SOH personnel are responsible for: Provide assistance to identify evaluate and address SOH hazards	73%	67%	73%	62%	68%	59%	64%
14	SOH personnel are responsible for: provide guidance for training and assistance to hep employees perfrom work safely	55%	75%	73%	62%	66%	59%	63%
15	SOH personnel: Analyze injury and illness reports and data to ensure countermeasures are developed	45%	58%	27%	46%	44%	49%	47%
16	SOH to Review and monitor compliance with policies	55%	75%	55%	54%	59%	49%	54%
17	5A. ANSI Recognition SOH as a core value	36%	75%	45%	85%	60%	32%	48%
18	ANSI: Reclamation providing a safe and health wrokplace, free of hazards	82%	75%	91%	100%	87%	49%	69%
19	ANSI: Continual improvement of SOH Program and program performance	64%	92%	91%	77%	81%	43%	63%
20	ANSI: Compliance with SOH regs	55%	75%	73%	69%	68%	32%	52%
21	ANSI: Ensure SOH considerations are integrated in planning decision, and daily work	55%	58%	82%	77%	68%	41%	54%
22	ANSI: Involve employees in development and implementation of the SOH program, policies, procedures	64%	75%	82%	54%	69%	32%	52%
23	ANSI: Provide necessary resources and training to implement policy	45%	75%	64%	77%	65%	49%	58%
24	ANSI: Communicate the policy to employees and affected parties	45%	75%	91%	69%	70%	49%	59%
25	Employ Certified Professionals (CSP, CIH, PE, or master's SOH) as the senior manager to recommend policy and guidance at the Commissioner's Office and Regional Offices.	45%	42%	36%	15%	35%	46%	38%
26	Encourage all safety professional to attain credentials	45%	42%	27%	15%	32%	38%	33%
27	SOH managers report to the Director, Regional Director, or Area Manager or to their immediate Deputy or Assistant.	91%	83%	73%	62%	77%	65%	69%
Average Percentage of All Reponses =		53.90%	69.35%	69.48%	68.96%	65.42%	44.40%	55.36%

Percentage of Respondents Who Answered "Don't Know"

"Don't Know"		Collective	RLT	Safety	Area Office Manager	Field Office/Facility Manager	Supervisor
<i>***The figures below display the percentage of the responses of "Don't Know" for each question.</i>							
0% White , 0.1% - 4.99% Yellow , 5% - 14.99% Red , >15% Dark Red							
1	Responsibilities - Directors Regional Directors, Managers are fulfilling their responsibilities: Communicating and Implementing SOH requirements	2%	0%	3%	0%	0%	8%
2	4E.RLT, AO Mgrs: Responsibilities Ensuring compliance and training	3%	9%	5%	0%	0%	0%
3	4E.RLT, AO Mgrs: Responsibilities. Ensuring mechanisms are in place to incorporate SOH into operations and work processes	4%	9%	5%	0%	9%	0%
4	Supervisors are responsible for: Implementing SOH Program	1%	0%	3%	0%	0%	0%
5	Supvsr: Maintaining workplace & equipment in safe manner	0%	0%	0%	0%	0%	0%
6	Supvsr: Conducting investigations, id factors, corrective actions, implementation	7%	0%	8%	0%	0%	23%
7	Supvsr: Meeting SOH needs i.e engineering controls, training, PPE	3%	9%	3%	0%	0%	8%
8	Employees are held accountable/responsible for:Complying with REC SOH requirements	0%	0%	0%	0%	0%	0%
9	Employees are accountable for: Completing SOH training	1%	0%	3%	0%	0%	0%
10	Employees are accountables for : Reporting SOH hazards/unsafe conditions to Sup	3%	0%	5%	0%	0%	8%
11	SOH Personnel are responsible for: Assist w/ Management process	7%	0%	0%	0%	18%	23%
12	SOH Personnel are responsible for: Advise mgmt and employees of SOH responsibilities	3%	0%	0%	0%	0%	15%
13	SOH personnel are responsible for: Provide assistance to identify evaluate and address SOH hazards	1%	0%	0%	0%	0%	8%
14	SOH personnel are responsible for: provide guidance for training and assistance to hep employees perfrom work safely	2%	0%	0%	0%	0%	15%
15	SOH personnel: Analyze injury and illness reports and data to ensure countermeasures are developed	11%	9%	5%	0%	27%	23%
16	SOH to Review and monitor compliance with policies	4%	9%	0%	0%	0%	23%
17	5A. ANSI Recognition SOH as a core value	7%	9%	5%	0%	9%	8%
18	ANSI: Reclamation providing a safe and health wrokplace, free of hazards	1%	0%	0%	0%	9%	0%
19	ANSI: Continual improvement of SOH Program and program performance	2%	0%	0%	0%	9%	8%
20	ANSI: Compliance with SOH regs	2%	0%	3%	0%	9%	0%
21	ANSI: Ensure SOH considerations are integrated in planning decision, and daily work	1%	0%	0%	0%	9%	0%
22	ANSI: Involve employees in development and implementation of the SOH program, policies, procedures	1%	0%	0%	0%	9%	0%
23	ANSI: Provide necessary resources and training to implement policy	1%	0%	0%	0%	9%	0%
24	ANSI: Communicate the policy to employees and affected parties	2%	0%	0%	0%	9%	8%
25	Employ Certified Professionals (CSP, CIH, PE, or master's SOH) as the senior manager to recommend policy and guidance at the Commissioner's Office and Regional Offices.	36%	27%	19%	50%	45%	77%
26	Encourage all safety professional to attain credentials	29%	27%	8%	33%	55%	62%
27	SOH managers report to the Director, Regional Director, or Area Manager or to their immediate Deputy or Assistant.	13%	9%	8%	0%	18%	38%
28	Responsibilities - Directors Regional Directors, Managers are fulfilling their responsibilities: Communicating and Implementing SOH requirements	2%	0%	3%	0%	0%	8%
Average Percentage of All Reponses =		5.44%	4.22%	3.09%	2.98%	8.77%	12.91%

**Appendix F:
SAF P01: Reclamation Safety and
Occupational Health Program**

Reclamation Manual

Policy

Subject:	Safety and Occupational Health Program
Purpose:	To establish the Bureau of Reclamation policy for the implementation and administration of an effective Safety and Occupational Health (SOH) Program. This Policy reinforces the Reclamation leadership's firm commitment to safety and health of its employees, contractors, and others working in, or visiting, bureau facilities. The benefits of this Policy are ensuring compliance, operational effectiveness, and consistency in implementing federal Occupational Safety and Health regulations, as well as those of the Department of the Interior and Reclamation.
Authority:	Occupational Safety and Health Act of 1970 (OSH Act) (Pub. L. 91-596; 84 Stat. 1590; 29 U.S.C. 651 et seq.); 29 CFR 1960, <i>Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters</i> ; Executive Order 12196, <i>Occupational Safety and Health Programs for Federal Employees</i> ; and Department of the Interior 485 DM, <i>Safety and Occupational Health Program</i> .
Approving Official:	Commissioner
Contact:	Security, Safety, and Law Enforcement (SSLE), Safety and Health Office, 84-43000

1. **Introduction.** The operation of Reclamation dams, powerplants, pumping plants, and other facilities entail inherent hazards to Reclamation employees, contractors, and others working in, or visiting, such facilities. The authorities listed require that Reclamation establish and maintain an SOH Program, providing safe and healthful workplaces for those individuals.
2. **Applicability.** This Policy applies to all Reclamation employees.
3. **Definitions.** For the purposes of this Policy, the terms in this paragraph are defined as follows:
 - A. **American National Standards Institute (ANSI) Z10, American National Standard for Occupational Health and Safety Management Systems (ANSI Z10).** National consensus standard on SOH management systems that provides organizations with a tool for continuous improvement of their SOH performance.
 - B. **Reclamation Leadership Team (RLT).** The RLT are Reclamation's Senior Executive and Senior Leader positions. A current membership listing can be found at the Reclamation RLT Intranet site.
 - C. **Reclamation Safety and Health Standards (RSHS).** Standards that augment federal and Department occupational safety and health requirements while providing specific requirements applicable to Reclamation's unique activities and operations.

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D. **SOH Program.** A set of interrelated elements that establish and/or support SOH policy and objectives, and mechanisms to achieve those objectives in order to continually improve SOH in Reclamation workplaces.

4. **Responsibilities.**

A. **Commissioner.** The Commissioner has executive responsibility for development, implementation, and evaluation of Reclamation's SOH Program.

B. **Deputy Commissioner, Policy, Administration, and Budget (PAB).** The Deputy Commissioner, PAB is responsible for:

- (1) serving as the Reclamation Designated Agency Safety and Health Official (DASHO);
- (2) as the DASHO, representing the Commissioner's interest and support in management of the SOH Program;
- (3) providing executive-level policy and SOH Program direction and guidance; and
- (4) representing Reclamation at Department DASHO Council meetings.

C. **Director, SSLE.** The Director, SSLE, is responsible for the overall development, implementation, and management of Reclamation's SOH Program, including policy development, budgeting, and continuous SOH Program improvement.

D. **RLT.** The RLT, both as a collective group and through its individual members, is responsible for:

- (1) providing visible guidance and operational leadership for developing and implementing SOH as a core value of Reclamation;
- (2) assessing information provided from SOH Program reviews; and
- (3) directing actions for continuous improvement of the SOH Program.

E. **Directors, Regional Directors, and Managers.** Directors, regional directors, office managers, area managers, and facility managers are responsible for:

- (1) communicating and implementing Reclamation's SOH requirements to employees, contractors, and visitors;
- (2) ensuring the employees under their supervision comply with SOH requirements and receive required training; and

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Policy

- (3) ensuring mechanisms are in place to incorporate SOH into operational activities and processes, where appropriate.

F. Supervisors. Supervisors are responsible for:

- (1) implementing all applicable aspects of the SOH Program;
- (2) ensuring that workplaces and equipment under their direction are maintained in a safe and healthful condition, and in compliance with applicable SOH requirements;
- (3) conducting/assisting accident investigations when required, identifying causal factors and corrective actions, and ensuring that those actions are implemented to prevent reoccurrence of similar, future accidents; and
- (4) meeting all SOH needs within their control (e.g., engineering controls, training, and personal protective equipment).

G. Employees. Employees are responsible for:

- (1) complying with Reclamation and other applicable SOH requirements;
- (2) successfully completing required SOH training; and
- (3) reporting SOH hazards or unsafe working conditions to their manager.

H. SOH Personnel. SOH personnel are responsible for:

- (1) assisting in the development of effective SOH management processes, using ANSI Z10 principles;
- (2) advising management and employees about their respective SOH responsibilities under the SOH Program;
- (3) providing guidance and technical assistance to management in order to identify, evaluate, and address SOH hazards;
- (4) providing guidance for training and assistance to help employees perform their work safely;
- (5) analyzing injury and illness reports and data to ensure that appropriate countermeasures are developed to prevent future injuries; and
- (6) reviewing and monitoring compliance with regulatory and organizational SOH policies.

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Policy

5. **Policy.** The Reclamation SOH Program will be developed and implemented using the principles contained in ANSI Z10.
- A. Through management leadership and employee involvement, Reclamation will:
- (1) protect its employees, contractors, and visitors, through the implementation of an effective SOH Program, recognizing SOH as a core value to Reclamation in accomplishing its mission to manage, develop, and protect water and related resources;
 - (2) provide a safe and healthful workplace, free of hazards to the maximum degree practicable, for all employees, contractors, and others performing work at or visiting Reclamation facilities;
 - (3) continually improve its SOH Program and the SOH Program's performance;
 - (4) comply with both the spirit and the letter of applicable SOH laws and regulations, including Department and Reclamation SOH requirements;
 - (5) ensure that SOH considerations are integrated into organizational planning, decision-making, and daily work activities;
 - (6) involve employees and their representatives in the development and implementation of the SOH Program's processes, plans, and procedures specific to their workplaces;
 - (7) provide the necessary resources and training needed to implement this Policy; and
 - (8) communicate this Policy to employees and other affected parties.
- B. The Commissioner's Office and regional offices will employ credentialed SOH personnel (as evidenced by a masters-level or higher SOH-related degree, or current Certified Safety Professional, Certified Industrial Hygienist, or a Professional Safety Engineer certifications) as the senior manager to recommend policy, provide guidance, and evaluate the implementation of the SOH Program. Requests for waivers will be prepared and submitted as required by RCD 03-03. To encourage professional SOH, Reclamation will promote the credentialing of full-time SOH personnel at all levels of the organization.
- C. SOH managers will organizationally report to a director, regional director or area manager, or to their immediate deputy or assistant, and will be a member of the immediate staff reporting to a director's, regional director's, or area manager's office.

Reclamation Manual Transmittal Sheet

Effective Date: _____

Release No. _____

Please ensure that all employees who need this information are forwarded a copy of this release.

Reclamation Manual Release Number and Subject

Summary of Changes

Filing Instructions

Remove Sheets

Insert Sheets

All Reclamation Manual releases are available at <http://www.usbr.gov/recman/>.

Filed by: _____

Date: _____

Appendix G:
SAF 01-01: Reclamation Occupational Safety
and Health - General

Reclamation Manual

Directives and Standards

Subject:	Occupational Safety and Health - General
Purpose:	Establishes processes for integrating safety and health into all Bureau of Reclamation programs, operations, and facilities. The benefits of this Directive and Standard are clearer understanding of the Safety and Occupational Health Program requirements and improved compliance with applicable Federal and Department of the Interior requirements.
Authority:	5 U.S.C. 7902; Public Law 91-596, Occupational Safety and Health Act of 1970; 29 U.S.C. 651 et. SEQ., 29 CFR 1960; Executive Order 12196; and Department of the Interior Safety and Health Manual, 485 DM.
Approving Official:	Director, Security, Safety and Law Enforcement (SSLE)
Contact:	Safety and Health Office (84-43000)

1. **Introduction.** The Occupational Safety and Health Administration (OSHA) and the Department of the Interior require bureaus to establish occupational safety and health programs. This directive and standard (D&S) establishes the framework for the Bureau of Reclamation Safety and Occupational Health program.
2. **Applicability.** This D&S is applicable to all Reclamation employees and activities.
3. **Definitions. Job Hazard Analysis** is a technique that focuses on job tasks as a way to identify hazards before they occur. After uncontrolled hazards are identified, steps can be taken to eliminate or reduce them to an acceptable risk level.
4. **Responsibilities.**
 - A. **Safety and Health Office, SSLE.** The Safety and Health Office, SSLE will:
 - (1) develop and issue appropriate Reclamation-wide safety and health guidelines, model programs, and assessment tools;
 - (2) develop, promote, and act as lead in the periodic evaluation of the implementation of Reclamation's safety and health program;
 - (3) monitor and interpret developments in new safety and health regulations, directives, standards, codes, guidelines, manuals, and technologies;
 - (4) manage accident/incident investigation and reporting program; and
 - (5) provide guidance in the development of safety and health paragraphs and clauses for solicitations/specifications and contracts.

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Directives and Standards

B. Directors (Senior Executive Service Management Positions). Directors will:

- (1) Provide leadership to ensure the implementation of an effective safety and health program within their area of responsibility.
- (2) Employ for each regional program a full-time, experienced, registered professional safety engineer or safety and health manager certified by the Board of Safety Professionals or the American Board of Industrial Hygiene as an immediate staff member. If a team concept is adopted to fulfill the above requirement, a highly qualified safety or health professional shall be designated as team leader. That individual's qualifications shall meet the Office of Personnel Management safety or health manager qualifications for a GS/GM-018/690/803 series.
- (3) Periodically assess the performance of managers/supervisors/leaders in implementation of the safety and health program.

C. Managers/Supervisors/Leaders. Managers/supervisors/leaders will:

- (1) implement an effective safety and health program within their area of responsibility;
- (2) provide professional safety and health services necessary to meet the provisions of the safety and health program;
- (3) conduct hazard analysis and exposure determinations;
- (4) provide safety and health training;
- (5) develop and implement a system of safety and health program measurement and accountability for employees;
- (6) investigate and report all accidents/incidents immediately as required by 485 DM and Reclamation directives;
- (7) correct identified unsafe or unhealthful conditions in Reclamation-managed facilities or operations; and
- (8) provide an environment for employee participation without fear of restraint, interference, coercion, discrimination, or reprisal.

D. Employees. Employees will:

- (1) observe established regulations, standards, codes, directives, and management initiated procedures for assigned operations and activities;

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Directives and Standards

- (2) practice safe work habits;
 - (3) promptly correct unsafe conditions, procedures, and acts; or report to their supervisor those beyond their control; and
 - (4) promptly report incidents and accidents to their supervisor and complete required forms.
5. **Program Direction.** As applicable, the following safety and occupational health program elements will be implemented by all Reclamation organizational components:
- A. **Program Implementation.**
 - (1) **Organizational Goals.** Establish annual safety and health goals.
 - (2) **Action Plans.** Establish and submit through each Director an annual safety and health action plan to the Reclamation Safety and Health Official by October 1.
 - (3) **Annual Reports.** Submit through each Director to the Reclamation Safety and Health Official an annual status report of safety and health action plan implementation by November 1.
 - B. **General Implementation Elements.**
 - (1) **Safety and Health Training.** Establish a training program that provides safety and health orientation and professional development necessary to meet management and operational safety and health needs.
 - (2) **Design Standards for Safety and Health.** Use established design standards for safety and health in all equipment specifications and design of Reclamation facilities.
 - (3) **Workplace Hazard Analysis.** Establish a comprehensive safety and health analysis of workplaces which identifies safety and health needs.
 - (4) **Written Programs.** Establish written hazard-specific programs and/or procedures in accordance with regulations, standards, codes, or directives.
 - (5) **Job Hazard Analysis.** Establish a process for conducting a job hazard analysis which identifies safety and health needs for job activities.
 - (6) **Accident Reporting.** Establish a system of accident investigation and reporting as required in 485 DM and Reclamation directives.

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Directives and Standards

- (7) **Safety and Health Inspections.** Establish a system for inspections of all Reclamation facilities and operations in accordance with regulations, standards, codes, and directives.
 - (8) **Safety and Health Committees.** Establish safety and health committees in accordance with 485 DM.
 - (9) **Safety and Health Meetings.** Conduct regularly scheduled meetings to address safety and health issues concerning employees, facilities, and operations.
 - (10) **Safety and Health Awards.** Recognize outstanding individual or group achievements through issuance of appropriate awards.
 - (11) **Program Accountability.** Establish a system of program measurement and accountability for safety and health, and periodically assess employee (management/supervisory/nonsupervisory) performance.
6. **Standards.** The following documents establish specific safety and health standards for the Reclamation mission:
- A. 29 CFR 1910 – Occupational Safety and Health Standards, General Industry
 - B. 29 CFR 1926 - Occupational Safety and Health Standards for Construction
 - C. DM 485 - Department of the Interior Safety and Occupational Health Program
 - D. Reclamation Safety and Health Standards

**Appendix H:
ANSI Z10 Occupational Health and
Management Systems Requirements**

ANSI Z10

Occupational Health and Safety Management Systems

Let the management system do the work!

Policy (Section 3.1.2)
 A. Protection and continual improvement
 B. Effective employee participation;
 C. Conformance with the organization's requirements
 D. Compliance with laws and regulations.

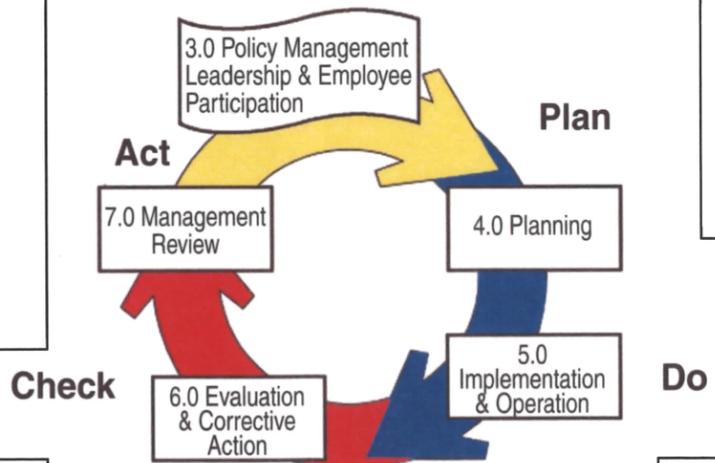
Top Management Responsibility and Authority (Section 3.1.3)
 A. Provide resources to support the OHSMS
 B. Defining roles, assigning responsibilities, establishing accountability, and delegating authority
 C. Integrating the OHSMS into the organization's other business systems and processes

Employee Participation (Section 3.2)
 A. Providing mechanisms, time and resources to participate in, at a minimum:
 • Planning
 • Implementation
 • Evaluation, corrective action and preventive action
 B. Providing access to OHSMS information
 C. Identifying and removing obstacles or barriers to participation.

- Progress in the reduction of risk;
- Effectiveness of processes to identify, assess, and prioritize risk and system deficiencies;
- Effectiveness in addressing underlying causes of risks and system deficiencies;
- Input from employees and employee representatives;
- Status of corrective and preventive actions
- Follow-up actions from OHSMS audits and previous management reviews;
- The extent to which objectives have been met;
- Performance of the OHSMS relative to expectations

Management Review (Section 7)
 A. Management review process
 • Annually
 • Recommend improvements
 B. Outcomes and follow-up
 • Future direction of the OHSMS
 • Changes to the organization's policy, priorities, objectives, resources or other OHSMS elements

Evaluation and Corrective Action (Section 6)
 A. Monitoring, measurement and assessment (inspections, exposure assessment, injury illness tracking, employee input)
 B. Incident investigations
 C. Audits
 D. Corrective and Preventive Actions
 E. Feedback to the planning process



Planning (Section 4)
 A. Comprehensive review
 B. Prioritize issues
 C. Objectives
 D. Implementation plans

- Business systems operational processes
- Hazards, risks and controls;
- Previously identified issues
- Allocation of resources;
- Regulations, standards and other requirements;
- Risk assessments and evaluations;
- Process and mechanisms for employee participation;
- Results of audits;
- Other relevant activities.

Implementation and Operation (Section 5)
 A. Operational elements
 • Risk Assessment
 • Hierarchy of Controls
 • Design Review and Management of Change
 • Procurement
 • Contractors
 • Emergency Preparedness
 B. Education, Training, Awareness and Competence
 C. Communication
 D. Document and Record Control Process

Note: This document provides a broad overview of ANSI Z10. Many of the requirements have been paraphrased and abbreviated. Refer to the standard for the actual requirements. The standard can be purchased on the ASSE website asse.org.