

RECLAMATION

Managing Water in the West

Final Report

Guidance for Incentives to Strengthen Commitment to Safe and Healthy Work Practices

Safety and Occupational Health Program Action Team #6 Recommendations



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.

Reclamation Safety Vision

Reclamation embraces safety excellence by empowering employees and integrating safety into our mission, achieving a culture which results in a safe environment for our employees, contractors, visitors, and the public.

Final Report

Guidance for Incentives to Strengthen Commitment to Safe and Healthy Work Practices

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Acronyms

ANSI Z10	American National Standard for Occupational Health and Safety Management Systems
D&S	Directives & Standards
DCA	Diversity Change Agent
DM	Departmental Manual
DOI	U.S. Department of the Interior
GAO	Government Accountability Office
OPM	Office of Personnel Management
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
RLT	Reclamation Leadership Team
SIP	Safety Incentive Program
SOH	Safety & Occupational Health
VPP	Voluntary Protection Program

Executive Summary

In 2014, the Bureau of Reclamation developed a Safety and Occupational Health (SOH) Action Plan which included the creation of 21 safety action teams. These teams were tasked to provide specific recommendations to the Reclamation Leadership Team (RLT) to address the deficiencies identified in the 2013 U.S. Department of the Interior Office of Safety and Health (DOI) SOH Program Evaluation. Among the findings in the DOI evaluation was that, “Reclamation has not yet embedded a culture that empowers and encourages employees to pro-actively recognize, identify, and correct facility hazards and compliance issues.”

Team #6 efforts focused on developing guidance to strengthen employee commitment to the SOH Program. The Team conducted extensive research on successful and proven safety incentive programs to determine methods to motivate employees to become involved in the SOH Program. The Team also researched Reclamation’s past and present award, incentive, and recognition practices as well as those of other Interior and Federal agencies and private industry. Additionally, the Team researched barriers to incentive programs, as well as regulations that permit or prohibit awards programs.

Team #6 found several factors which increase participation in the Safety and Occupational Health Program. Among these, active participation at all organizational levels is needed to generate a positive safety culture. Additionally, employee engagement is one of the five key elements of ANSI Z10, the standard that forms the cornerstone of Reclamation’s SOH Program.

Coincidentally, the Federal Employee Viewpoint Survey and the Diversity Change Agent program have both identified the need for increasing employee engagement as goals for FY 2015.

Based on this research, Team #6 recommends:

1. Reclamation leadership should communicate that behavior-based Safety Incentive Programs (SIPs) are acceptable, and encourage their development at all levels of the organization.
2. The Reclamation-wide Safety Advisory Board/SOH Council should issue a directive providing instruction on implementing SIPs. The directive should include the Minimum Awards-based Safety Incentive Program Criteria provided in this report.

3. The Reclamation-wide Safety Advisory Board/SOH Council should establish and communicate specific criteria for all safety awards at Reclamation, Regional, and Area/local Offices.
4. Reclamation leadership should consider modifying Reclamation's existing non-monetary awards policy to allow for clothing to be procured within strict guidance for safety awards programs, including labeling of the clothing item with some indication that it is a safety award. Safety Awards in the form of clothing should be earned and should not be provided as a promotional 'give-away' product.
5. Reclamation leadership, management, and supervisors should provide enhanced opportunities for employees to be included and further engaged in SIP implementation through use of Diversity Change Agent principles.

Introduction

In 2013, the DOI Office of Safety and Health conducted an evaluation of Reclamation's SOH Program and identified numerous areas for improvements across the agency. In particular, the report concluded "A degree of cultural complacency exists that results in the acceptance of uncorrected facility hazards and contributes to the presence of uncorrected facility hazards, Occupational Safety and Health Administration (OSHA) non-compliance issues, and incomplete Safety and Occupational Health Program implementation."

In February 2014, Reclamation convened a SOH Action Plan Team to develop a plan to address the concerns in the DOI evaluation. The SOH Action Plan¹ suggested the creation of 21 safety action teams that would provide recommendations to the Reclamation Leadership Team (RLT) as to how best to address the weaknesses noted by DOI.

Safety Action Team #6 was tasked with developing guidance for incentives to strengthen commitment to safe and healthy work practices. Team #6 has concluded there is a broad range of ways to motivate employees to increase awareness and commitment to safety. Traditional approaches use recognition and awards to generate desired behavior while more contemporary approaches use promotion and marketing methods (much like advertising campaigns influence consumer behavior to purchase a product). The term "Safety Incentive Program" (SIP) emerged as an all-inclusive concept covering the broad range of approaches.

After further research and discussion of best practices within Reclamation², other Federal agencies and industry, and a review of existing Office of Personnel Management (OPM), DOI, and Reclamation regulations, the Team narrowed its focus to the more traditional approaches to SIPs. Such award-based programs, which existed previously in Reclamation in many forms with varying degrees of success, can be effectively employed in local offices at a reasonable cost and within the capabilities of existing staff and can also be used as a "first step" toward implementing a broader SIP as appropriate.

This report documents the key steps taken by the Team including:

- Understanding SIP types (rate-based or behavior based)
- Assessing safety incentives in Reclamation and other organizations
- Identifying supervisory practices used to motivate employees
- Identifying potential barriers to implementing SIPs

¹ *Safety and Occupational Health Action Plan*, Bureau of Reclamation, May 2014

² The Team acknowledges Juli Smith, Lower Colorado Regional Safety and Occupational Health Manager, who contributed extensive research and valuable expertise.

- Identifying the regulations and policies that apply to SIPs
- Recommending key elements for effective SIPs

Safety Incentive Program Types

Awards-based SIPs are either rate-based or behavior based (Table 1).

Table 1: Safety Incentive Program Types

Rate-based programs Reward workers who had few or no reported injuries or illnesses during a set time period	Behavior-based programs Reward workers for behaviors such as reporting near-miss incidents or recommending safety improvements
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Source: GAO analysis of workplace safety literature.

Rate-based incentive programs reward workers for low injury or illness rates, while behavior-based programs reward desired behaviors, such as reporting hazards. OSHA has expressed concerns that rate-based programs have an adverse effect of suppressing injury and illness reporting. In 2008, OSHA issued guidance to the Voluntary Protection Programs³ (VPP) prohibiting the use of rate-based incentive programs.

In 2012, OSHA issued further guidance⁴ to non-VPP employers to discourage the use of rate-based incentive programs, recommending that employers encourage safe work practices through incentives that promote worker participation in safety-related activities such as hazard identification, or incident investigations. In this guidance, OSHA recommended that modest employee incentives, like providing t-shirts for safety committee members, holding recognition events after completion of goals, or presenting modest rewards for submission of successful safety suggestions, be used to recognize safety participation.

Historically, rate-based programs have been more common than behavior-based programs because such programs are easier for supervisors to administer and for participants to understand. A behavior-based program requires more effort to administer, but is likely to be more effective because employee involvement in the safety program is increased through this approach. Active employee participation improves the safety culture over the long term because the rewards

³ The Voluntary Protection Programs (VPP) recognize employers and workers in the private industry and federal agencies who have implemented effective safety and health management systems and maintain injury and illness rates below national Bureau of Labor Statistics averages for their respective industries. Approval into VPP is OSHA's official recognition of the outstanding efforts of employers and employees who have achieved exemplary occupational safety and health.

⁴ *Employer Safety Incentive and Disincentive Policies and Practices*, March 2012, DOL OSHA; <https://www.osha.gov/as/opa/whistleblowermemo.html>

are earned by actions on the part of the employee rather than by passive avoidance of injury. Some examples of active and passive employee involvement are presented in Table 2.

Table 2: Examples of Passive versus Active Employee SOH Program Participation

Employee Involvement	
Passive	Active
Attending safety meetings	Presenting or contributing at a safety meeting
Using suggestion boxes	Identifying and helping resolve issues
Following the rules	Developing a safety procedure on their own
Reporting a hazard to supervision	Personally abating a hazard

A Government Accountability Office (GAO) analysis⁵ of SIPs referred to the behavior-based programs as “a component of an employer’s safety and health management system” that is part of other workplace policies, such as demerit systems that discipline workers for unsafe work practices or failure to follow procedures. The GAO estimated that 25% of U.S. manufacturers have SIPs: 22% are rate-based and 14% are behavior-based. It is common for manufacturers to have demerit systems (70%) and greater than 20% have multiple incentive programs. The GAO’s study of the effectiveness of incentive programs was inconclusive as to whether rate- or behavior-based incentive programs have a positive effect on workplace safety. However, the report discussed the potential for rate-based programs to have an adverse effect of discouraging injury and illness reporting.

The GAO concluded, “*How employers manage safety has a greater influence on workers’ actions, including whether they are likely to report injuries and illnesses, than any one program or policy... Workplaces with a positive safety culture placed a strong emphasis on safety by, for example, encouraging open communication about safety issues, placing a high priority on safety training, and having procedures that prevented breakdowns in workplace safety.*” The GAO also recommended that OSHA develop criteria for SIPs; however, to date, such criteria have not been released.

Based on the conclusions of the GAO report and the OSHA guidance discussed, the Team recommends that SIPs should be behavior-based. Properly structured incentives – those that encourage employee involvement in safe work practices –

⁵ *Better OSHA Guidance Needed on Safety Incentive Programs*, Government Accountability Office Workplace Safety and Health, April 2012

should lead to improvements in accident rates without giving employees reason to “hide” or under-report accidents or injuries.

Reclamation SIP Experience, External Practices, and Best Practices

Team #6 reviewed Reclamation and DOI historical and current practices, publications, and Internet resources related to strengthening employee commitment to safety (see Appendix A for the Literature Review). The Team also conducted Internet searches on public and private organizations that appeared to have strong safety programs and commitment to those programs.

The following sections reflect Reclamation, DOI, and private sector SIP best practices for motivating employees.

Reclamation Experience

Research into past Reclamation safety awards and incentive programs and their effectiveness was conducted through interviews, Internet searches, and document research. Follow-up conversations with safety professionals and other employees were conducted to verify the effectiveness, success, and failures of current and past Reclamation incentive programs. Conversations with safety staff as to their past experiences with other employers, and research into SIPs at other Interior agencies and the private sector were also conducted in person or by e-mail.

Additionally, Team #6 contacted approximately 50 Reclamation safety staff, requesting information on active or discontinued awards or incentive programs in their respective offices. The response rate was low, and the majority of responses indicated that there were no separate safety awards programs outside the Human Resources awards programs (i.e., Special Thanks for Achievement [STAR], Time-Off Recognition, and Non-monetary Recognition). For offices that indicated they had SIPs in the past, Team #6 followed up to determine when and why the programs were discontinued. Regional SOH Managers were also interviewed in an attempt to gather additional insights. Where active SIPs were identified, the Team conducted additional interviews with those offices.

Interviews were conducted by phone, with subsequent responses and documents sent via e-mail. The conversations focused on determining at what organizational levels the program existed (i.e., Regional, Area Office, or local), and at what levels guidance was provided; how prevalent safety awards programs were either in the past or present, and for how long had the program been active; what type of

program was implemented; how the program is administered and by whom; how employees are involved; how beneficial, effective, or successful the program has proven to be and how this is measured; and whether there are sufficient resources to sustainably administer the program. Interviewees were asked about program barriers, potential improvements for the program, and the role of Reclamation leadership in a SIP.

Research Conclusions

Conclusions from the review of Reclamation's current and past awards/incentive programs include:

- Reclamation has inconsistently implemented SIPs in the past. Reclamation-wide policy instruction was not found. Many programs were not communicated well to employees. Staffing necessary to support the administration of the programs was difficult for offices with already low staffing levels.
- Reclamation-wide awards included the Commissioner's Award, safe-driving, and construction awards which are awarded to specific Regions. No information could be found on the criteria for these awards. In 2014, the Reclamation Safety Council introduced the criteria listed in Appendix B for the Commissioner's Award.
- Area Office competitions existed in past years to encourage team performance. A common example was a travelling trophy, but the criteria for this award were not clear. Most local and Area Office SIPs appear to have been discontinued around 2009 due to budget issues. In 2011, Executive Order 13589 – Promoting Efficient Spending, which encouraged agencies to 'limit the purchase of promotional items,' reduced SIPs even further. However, in 2015, a few offices reported they are reinstating some programs.
- SIP documents, including Regional and Area Office guidelines and SIP implementation procedures, dating from 1998 through 2011, were issued in at least four regions.
- SIPs administered between 1998 and 2006 were awarded to individuals or teams who did not have a lost time or recordable injury, or a motor vehicle incident or violation within the previous fiscal or calendar year. These programs were primarily self-nominating and administered by the local or Area Safety Office.
- More recent programs (2008 – 2014) reward employee contributions to, participation in, or completion of safety program activities, and are less focused on incident rates. The movement of Reclamation SIPs from purely

rate-based programs to behavior-based is more aligned with OSHA's guidance. Most SIPs were discontinued during the budget sequestration of 2013 so many of these programs were not ever fully implemented.

- Employee involvement in the development of local programs varies. Some programs are developed and administered by the local safety office with a self-nomination by the employee for an award. Others provide for employee involvement through creation of an incentive program board or committee via the local safety committee with oversight by the local safety office.
- Awards were, and continue to be, monetary (STAR), non-monetary, or time-off. Some program teams pre-select items to be earned, while others utilize 'gift booklets' that provide a selection of items that can be purchased with the points earned.
- There were three basic types of Reclamation SIPs:
 - Human resource-based with no defined safety criteria.
 - Self-nominating, points-based administered by the local safety office.
 - Behavior-based in which the employee participated in safety program activities to accumulate points that were redeemed for an award. Some points were earned by not having accidents.
- Implementation of Regional guidance was inconsistent within regions. Some offices did not have SIPs.
- Interviewed safety staff shared the perception that awards based on rates results in a suppression of incident reporting.
- SIP effectiveness was measured by the number of employees participating.
- Where a SIP has been implemented, morale was perceived as having increased, and improvement was apparent. When a SIP was discontinued, safety professionals believed morale suffered and participation in safety-related activities decreased.
- Interviewees provided the following suggestions for future SIPs:
 - Engage supervisors in the process. Supervisors are essential to the success of the SOH and/or SIP/awards programs and should have a safety element in their performance plans to ensure they lead by example in engaging in safety.

- Use involvement/participation in accident prevention activities instead of loss/injury rates as criteria.
- Provide Reclamation-level guidance requiring all offices to have SIPs with minimum criteria.
- Clarify the Commissioner's Award criteria.
- Improve marketing and communication of the SIP. Communicate the accomplishments required to earn a safety award, and regularly communicate the success in measureable objectives.
- Ensure employee committees participate in developing and/or administering SIPs, including developing criteria and selecting award items.
- Each office should utilize employee input in developing a SIP. This promotes buy-in from the employees and ensures the reward is something employees would value.

External Practices

Other Interior agencies generally use the DOI Awards and Recognition Program (Departmental Manual [DM] Part 370 Chapter 451) to guide their SIPs, and can develop their own recognition programs per DM 485 Chapter 10. The Interior programs reviewed are listed in Appendix C.

Review of the U.S. Army Corps of Engineers Safety Award Program⁶ identified that honorary awards are common; however, the Corps also supplements this program with local behavior-based non-monetary SIP awards "...tailored to recognize accident prevention accomplishments within their sphere of activity, interest or operation."

Private sector research included Internet research and safety professional experiences with these programs in private industry. Private sector incentive programs have more flexibility in that they typically offer more money, offer awards more frequently, and are often contracted to a third party to administer.

Private sector awards include items such as gift cards, movie or sporting event tickets, clothing, and cash awards, which are limited or prohibited in the Federal sector.

Much like the Federal government, the awards in private firms are evolving from rate-based to more behavior-based programs, and are based on accident avoidance, participation in safety committees, and safety suggestions, slogans, and similar contributions.

⁶ *USACE Safety Award and Recognition Program*, June 2012, <http://www.publications.usace.army.mil/LinkClick.aspx?fileticket=wc-FPItGfa4%3d&tabid=16441&portalid=76&mid=43546>

Best Practices

Employee participation and improved safety performance at all levels are the desired outcomes of an effective SIP. An awards program can include recognition, promotional items, and incentives to increase participation, engagement, and compliance with safety work practices, hazard reporting, and a number of other actions used to improve the SOH Program.

Employee engagement is the key component to SOH Program improvement. Without active participation by all employees, supervisors and managers, Reclamation's safety culture will not evolve and the safety management system cannot reach full potential.

The resulting benefits of an effective, participatory incentive program include:

- Employees participate in identifying associated risks and are actively engaged in creating a safer workplace.
- Motivation increases when employee ideas and suggestions are taken seriously, management feedback or responses are provided to ideas and suggestions, and all or portions of an idea are implemented.
- Employees demonstrate an increased willingness to follow work policies and procedures because they are involved in process development.
- The number of employees identifying hazards, correcting hazards, and reporting them for further action increase.
- Near miss incidents and minor injuries are reported with greater frequency.
- Presenting or sharing safety information in training or in general conversations is increased, thereby improving communication throughout the organization.
- The numbers of volunteers and attendees in safety committee workgroups and meetings increase.
- Requests for assistance in improving safety control processes, performing risk assessments, and improving quality of safety training increase.

Incentives can be used to encourage employee activities and behaviors that promote a safe workplace. Examples of behaviors that can be rewarded are:

- Completing safety training on time and/or conducting training sessions for other employees
- Reporting of “near misses”
- Sharing of lessons learned (through conversations and newsletter articles)
- Participation in and presentations at safety meetings
- Identifying workplace hazards, either during inspections or through observation
- Eliminating or reducing hazards, developing solutions or improving work practices to reduce them
- Suggesting and/or implementing improvements to motor vehicle or water safety programs, or contributing to accident prevention
- Exhibiting a proactive safety attitude (always wearing appropriate protection, pointing out hazards to other employees, being a “champion for safe practices,” etc.)
- Submission of or response to a “question of the week”, crossword puzzles, or slogan/poster contests
- Volunteering to serve on safety committees or safety teams and projects
- Participating in accident investigations, and/or conducting work area inspections and job safety analyses
- A signed commitment pledge to good safety practices

Awards range from honorary recognition and monetary incentives, to nominal non-monetary awards (less than \$50) and time-off. Below are a few examples; more are listed in the Supervisor Toolbox in Appendix D.

- Safety Coin, used as a timely non-monetary recognition tool
- Safety Champion Awards
- Safety Suggestion Awards
- Achievement Awards (for meeting annual safety objectives)
- Points-based Awards Shopping List (vendor’s book)
- Special Personal Protective Equipment (PPE) (e.g., Harley Davidson brand glasses, hardhats with NFL logos)

Supervisory Practices to Motivate Employees

Supervisors should strive to develop a work environment that motivates employees to be involved in SOH practices. This summary provides insights and research on specific supervisory techniques that are commonly used to motivate employees.

SOH Team #18 is developing Managing Employee Safety and Health (MESH) training, which is expected to address many motivating practices, including the following approaches:

- Demonstrate personal commitment by discussing some aspect of safety every day with employees, and validating employee concerns.
- Provide timely recognition when a job is well done, and in the context of why it was recognized (i.e., what benefit did it have in the context of safety – within safe procedures, under budget, and within time limits).
 - Highlight employee safety achievements in staff meetings, Regional newsletters, or The Safety Factor.
 - Recognize employees through monetary, non-monetary, and time-off awards.
 - Issue “special” or personalized PPE.
- Set a good example by not allowing shortcuts, and redirect behaviors in a positive manner when undesired behaviors are observed. Ask questions that can help employees be more mindful of hazards or personal practices.
- Encourage positive peer-to-peer collaboration to create a safe workplace.
- Provide and articulate expectations for achieving specific objectives, including goals, milestones, and deadlines to accomplish the actions.
- Determine what motivates individuals or workgroups. Examples of some motivators are monetary, non-monetary, and time-off awards, a “special” training course or field trip, and simple appropriate appreciation gestures.

Performance Plan Elements

Safety can be identified as part of or as an element in employee performance plans at each organizational level per DM 485 Chapter 2⁷, which was revised in November 2015. This policy mentions “performance” in multiple locations in reference to managers’, supervisors’, and employees’ responsibilities and accountability. The Team recommends that consideration be given to including safety responsibilities as a critical element in performance plans.

Per 485 DM 2, a Line Manager/Supervisor, specifically:

1. Implements Program requirements within the scope of authority.
2. Provides and/or secures appropriate safety and health training for employees and volunteers.
3. Monitors operations and activities and inspects work areas for hazardous acts and conditions. Abates deficiencies in accordance with 485 DM 5. Provides and ensures proper use of personal protective equipment where other hazard controls, such as engineering controls or administrative controls, are infeasible.
4. Reports and investigates job-related accidents and implements corrective actions to prevent recurrence. Ensures that all such accidents are reported using the Safety Management Information Systems (SMIS).
5. Promotes safe and healthful work performance through recognition of safe behaviors or progressive disciplinary actions for unsafe behaviors.
6. Provides for employee participation in the program without employee fear of restraint, interference, coercion, discrimination, or reprisal.
7. Requires safety and health to be integrated into the planning of every hazardous job through job hazard analyses. (485 DM 14)
8. Conducts routine inspections of facilities within his/her scope of control as directed.

According to the same reference, employees shall:

1. Comply with applicable work rules and procedures, including the use of safety equipment provided by bureaus or offices.

⁷ DOI Departmental Manual Part 485: Safety and Occupational Health Program, November 2015, <http://elips.doi.gov/elips/0/foi/1594/Row1.aspx>

2. Identify, report, and/or correct unsafe and unhealthful working conditions within the scope of their responsibility and authority.
3. Exercise rights and responsibilities as granted by the Program without fear of restraint, interference, coercion, discrimination, or reprisal for reporting an unsafe or unhealthful condition, or otherwise participating in the Program as required.
4. Actively participate in safety and health education and training activities,
5. Report every job-related accident to their supervisors that results in, or has the potential to cause injury, illness, or property damage; and report personal conditions (physical or mental) that adversely affect their ability to perform in a safe and healthful manner on the job.

As with any performance element, failure to meet expectations can be addressed through a performance improvement plan. For example, failure to wear personal protective equipment as required can be both a performance issue and a conduct issue.

An SIP is designed to increase participation in the safety program beyond that which is required by DM 485. The *Best Practices* section above provides a description of beneficial behaviors anticipated in a successful SIP. Employees will likely go beyond the basic responsibilities, and increased commitment evolves over time as positive behaviors are encouraged and rewarded.

Safety Incentive Program Barriers

Through the course of Team #6's research and interviews, several barriers were identified that hindered or prevented effective SIP implementation. Below is a summary of the most common barriers the Team found.

- Lack of corporate commitment, direction and/or guidance as to what is permissible and desirable within existing OPM, DOI, and Reclamation policy and directives has led to inconsistent implementation across Reclamation.
- Lack of budgetary resources has resulted in seemingly successful programs being underfunded and/or discontinued completely. Budget sequestration, EO 13589 (which limited the use of promotional items), and ensuing policies by DOI and Reclamation have resulted in severe restrictions to both funding and awards.
- Lack of employee engagement in safety awards program development has limited employee buy-in, acceptance, and participation.
- Lack of consistent communication from upper management through local levels, combined with minimal safety staffing, have likely resulted in incomplete communication throughout the organization. (For example, many employees were not aware of the Commissioner's Safety Award.)
- Budgetary pressures, combined with the lack of demonstrable SIP benefits, supporting trend analysis, or other metrics, make SIPs vulnerable to being eliminated when resources are tight. There is no perceived return on investment without the establishment of measureable objectives.
- Some managers and supervisors believe following safety procedures is inherent to the job and a condition of employment; therefore, safe behaviors should not necessarily be rewarded through a SIP.
- Employees frequently are not given the opportunity to provide input into the awards selection.
- Current constraints on non-monetary awards (e.g., maximum of \$50 per year per employee) have limited the usefulness of non-monetary awards to encourage safe behavior.
- Safety Offices at many locations operate with only collateral duty safety representatives, or with insufficient staffing levels.

- OSHA's stance on SIPs is frequently misinterpreted. A March 2012 OSHA memorandum⁸ was released to help ensure SIPs are not overly focused on accident rates which would encourage under-reporting of injuries. It was reported that OPM is currently reviewing OSHA's proposed rule to address safety incentive programs that reward employees for low accident levels.⁹

⁸ *Employer Safety Incentive and Disincentive Policies and Practices*, March 12, 2012, OSHA Memorandum; <https://www.osha.gov/as/opa/whistleblowermemo.html>

⁹ *OSHA's final rule may prohibit safety incentive programs*, November 5, 2015; <http://www.lexology.com/library/detail.aspx?g=a0fe9aa7-b8c9-46f2-a57e-8fa8216e9e92>

SIP-Related Regulations and Policies

The DOI evaluation of Reclamation’s safety program identified that, “Constraints resulting from sequestration and other budget limitations have had safety-related impacts. Reclamation leadership and management need to be aware of these impacts and determine compensatory measures where feasible.”

In November 2011, Executive Order 13589 limited the use of promotional items. In August 2012, DOI responded to the EO by issuing an acquisition policy further restricting the purchase of promotional items, followed by a similar change to the human resources non-monetary awards policy in November 2012.

Non-monetary awards historically included promotional materials, such as shirts and jackets, which were used as ongoing visual reminders of safety, and to motivate employees to become more active participants in the SOH Program through safety incentive programs. With the number of recent changes to policy, clear and consistent information is lacking as to what is permissible to promote safety and health performance, to award performance, and to recognize accomplishments.

NOTE: The objective of the Summary and Synopsis below is to provide a compilation of the most current policy guidance related to safety awards and recognition programs as of the date of publication of this report. The applicable references, links to the documents themselves, and summaries of content are provided.

Regulation Summary

OPM and DOI policy allow for the development of awards, incentive, or recognition programs for employees, supervisors, and/or managers provided specific performance criteria are established.

Policies for awards and recognition exist in multiple governmental departments, series, and levels. Ambiguities exist due to the broad discretion given in the multiple resources listed below:

OPM regulations (5 CFR Parts 430 and 451)

OPM regulations (5 CFR Parts 430 and 451) define awards and recognition programs and, with a wide breadth, permit agencies to develop these programs with employees involvement.

<http://www.gpo.gov/fdsys/pkg/CFR-2001-title5-vol1/pdf/CFR-2001-title5-vol1-part430.pdf>

<http://www.gpo.gov/fdsys/pkg/CFR-2001-title5-vol1/pdf/CFR-2001-title5-vol1-part451.pdf>

Department of Labor, OSHA Part 1960

DOL OSHA Basic Federal Safety and Occupational Health Program (Title 29, Part 1960) requires performance evaluations commensurate with responsibility and authority for safety and health duties, and recognition is encouraged.

https://www.osha.gov/pls/oshaweb/owastand.display_standard_group?p_toc_level=1&p_part_number=1960

DOL OSHA has expressed concerns over the negative effect some incentive/awards programs may have on suppressing reporting of incidents, injuries, and illnesses. Where a program reward is sufficient to affect negative reporting, these programs may be seen as violating 29 CFR 1904.36 (11)(c).

<https://www.osha.gov/as/opa/whistleblowermemo.html>

DOI Safety Management Series Part 485 Chapter 10, Safety Management Awards

DOI 485 DM 10 allows DOI bureaus to establish a program to award, recognize, and promote SOH performance.

<http://elips.doi.gov/elips/0/doc/1598/Page1.aspx>

DOI Personnel Management Series Part 370, Chapter 451, Awards and Recognition Program

DOI 370 DM 451 – 451.6 establish the policy and categories in which accomplishments may be awarded or recognized.

<http://elips.doi.gov/elips/0/doc/1173/Page1.aspx>

DOI Acquisition Policy Release 2012-10, Restriction on the Purchase of Promotional Items (DIAPR 2012-10)

DIAPR 2012-10 does not apply to non-monetary awards, but the February 2013 change to 370 DM 451.5 eliminated a number of promotional items from the non-monetary awards previously used to recognize employee accomplishments.

<https://www.doi.gov/pam/programs/acquisition/upload/DIAPR-2012-10-Amendment-1-Restriction-on-the-Purchase-of-Promotional-Items.pdf>

Reclamation ADM 06-01

In April 2014, Reclamation ADM 06-01 was revised to prohibit clothing purchases for non-monetary awards. Furthermore, all non-monetary awards are required to be purchased through the corporate blanket purchase agreements and through designated ordering officials only.

<http://www.usbr.gov/recman/adm/adm06-01.pdf>

Acquisition Circular (RAC) No. 12-17, Approval Process For Promotional Item Purchases.

RAC (updated September 2012) provides process and controls over promotional item spending; however, it does not apply to non-monetary awards.

http://www.usbr.gov/vip/downloads/RAC_12-17_Attachment_2.pdf

Purlbook 2015

The June 2015 Purlbook states that non-monetary awards and promotional items are permitted for purchase with approval through ADM 06-01. Absent specific authority, appropriated funds may not be used for promotional items.

<http://intra.usbr.gov/mso/aamd/chargecard-purchase-promotional.html>

Synopsis

Based on guidance provided in the references above and additional regulations and directives listed in Appendix E, at a minimum, an awards-based SIP should meet the following criteria.

Minimum Awards-based Safety Incentive Program Criteria
<ol style="list-style-type: none">1. Award programs must have specific procedures and requirements.2. Multiple award programs are permissible within a bureau.3. Program may be structured in multiple ways to allow recognition by individual or group accomplishment and awards may be flexible.4. Employee involvement is encouraged in the development of such programs.5. Fund obligation should be consistent with financial management and delegations of authority.6. Justification for awards must be clearly documented (using form DI-451).7. Program can't conflict or violate other regulations.8. Program must be clearly communicated to all employees.9. Non-monetary Awards:<ul style="list-style-type: none">• Cannot exceed \$50 per person, annually. Some exceptions may apply.• Should contain the bureau name, logo, award title, and/or mission, when appropriate.• Cannot include clothing (per Reclamation policy; allowable by DOI)10. Program must not result in suppressed reporting of incidents, injuries, or illnesses or retaliation for employees reporting.

Incentive Program Elements

Based on the Team's research into SIPs, and taking into account the principles of ANSI Z-10, Team #6 has compiled the following list of elements that contribute to an effective successful safety incentive program. Offices are encouraged to create their own SIPs, tailoring them to meet the unique needs of their individual employees and facilities. Incorporating all the following elements into a SIP ensures the best opportunities for program success.

Employee involvement

For a SIP to succeed, employees must be active participants in all aspects of the program. This starts with them having input into creation of the program, assisting with program implementation, and ensuring rewards are earned through proactive measures. One of the most effective ways to involve employees in the SIP is through use of safety committees. It should be noted that employee involvement also includes the participation and commitment of supervisors and managers.

The importance of employee involvement is being recognized in other priority programs. For example, the Diversity Change Agent Strategic Plan includes the following element: "Practice inclusion and engagement at all levels of Reclamation in our daily practices to optimize efficient and effect mission accomplishment." Similarly, to efficiently and effectively accomplish our mission in a safe and healthy manner, employee engagement at all levels is be critical.

Behavior-based

Successful SIPs must be behavior-based to encourage participants to actively engage in safety-related activities.

Flexible

Successful SIPs are flexible. They adapt to the unique and often changing needs of the workforce at a given facility. If an aspect of a SIP is ineffective or has become stagnant, the SIP should be open to changing that aspect. One of the central concepts in ANSI Z-10 is the idea of continual improvement, and this can only be achieved in a SIP through flexibility. All SIPs should periodically be evaluated for effectiveness and updated accordingly.

Compliant

Any SIPs adopted within Reclamation must comply with OPM rules, Departmental policy, and Reclamation policy. Tracking the changes in these three sets of rules can be challenging for Area Office and Regional employees, and the resulting confusion about what is permitted and what is not can constitute a barrier to SIP creation. Frequent and open communication by program specialists who can properly interpret and convey associated policy changes is the key to compliance when it comes to SIP creation.

Timely

An incentive is only effective when it is delivered in a timely fashion, so the employee can associate a specific behavior or action with the reward. In addition to timeliness, it is important that the recognition be meaningful as well. Presenting an award publicly in the presence of the employee's coworkers reinforces the safety message both for the recipient, and for the group as a whole.

Goal-driven

A SIP should have goals that are SMART: Specific, Measurable, Achievable, Realistic, and Timely.¹⁰ SIP participants should be informed of these goals as well as the progress the program is making towards them. Goals should be periodically evaluated to determine if they are having the desired effect. Ideally, leading indicators – such as inspections, deficiency abatement, number of JHAs reviewed/revised, and training completion – should be used to measure the success of a SIP.

Choice of reward

Not all employees are motivated by similar things. An employee who has been with Reclamation for decades and prudently uses their annual leave may not be inspired by a time-off award. Conversely, a newer employee with very little accrued leave may find that reward highly motivating. A SIP that lets participants choose from a variety of awards is more likely to motivate a wider segment of the workforce.

¹⁰ Reference: Doran, G. T. (1981). "There's a S.M.A.R.T. Way to Write Management's Goals and Objectives", *Management Review*, Vol. 70, Issue 11, pp. 35-36.

Recommendations

Based on Team #6's research into SIPs, both in general as well as specific to Reclamation's experiences with them, the Team recommends the following.

1. Reclamation leadership should communicate that SIPs are acceptable, and encourage their development at all levels of the organization. In order for SIPs to succeed, there has to be an understanding among employees that these programs have support from the highest levels of leadership.
2. The Safety Advisory Board/SOH Council should issue a directive providing instruction on implementing SIPs. This document should list the elements of successful SIPs (e.g., Minimum Awards-based Incentive Program Criteria), emphasizing the creation of SMART goals and periodic reviews of program effectiveness. The document should also clearly outline award limits and other restrictions. Regional and Area Offices will be encouraged to develop their own SIPs tailored to their employees and facilities, using this document as a tool to guide them.
3. Establish and communicate specific criteria for all awards at the Reclamation-wide, Regional and Area Office levels.
4. Modify Reclamation's existing non-monetary awards policy to allow for clothing to be procured for safety incentive programs, providing that "Safety Award" or other language is applied to the product to indicate a relation to safety. Also ensure the SIP includes specific guidance for procurement of these items.
5. Provide opportunities for employees to be active participants in all aspects of an SIP by incorporating employee involvement and inclusion efforts similar to those utilized in Diversity Change Agent practices.

Appendix A

Literature Review

- Atkinson, W. (2004). Safety incentive programs: What works? *EHSToday*. Retrieved 12/06/2014 from http://ehstoday.com/safety/incentives/ehs_imp_37145
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- Roark, S. (n.d.). Goals and strategies to optimize safety incentive programs under OSHA's new regulations. Retrieved 12/06/2014 from <http://region3.asse.org/wp-content/uploads/2012/09/SeanRoark-How-Your-Safety-Incentive-Program-can-be-Effective-and-in-Compliance-with-OSHAs-Guidelines.pdf>
- Roark, S. (2012). The winding staircase to setting up a safety incentive program. *Occupational Health & Safety*. Retrieved 12/06/2014 from <http://ohsonline.com/Articles/2012/10/01/The-Winding-Staircase-to-Setting-Up-a-Safety-Incentive-Program.aspx>
- Safety incentive programs. Quick tips #114. (n.d.). *Grainger*. Retrieved 12/06/2014 from <http://www.grainger.com/content/qt-safety-incentive-programs-114>
- Wright, H., & Barker, M. (2012). OSHA's stance on safety incentive programs. *Occupational Health & Safety*. Retrieved 12/06/2014 from <http://ohsonline.com/articles/2012/09/01/oshas-stance-on-safety-incentive-programs.aspx>

Reclamation Resources

- | | |
|------------|---|
| 8/26/2008 | LCDO Delegation of Authority for Awards and Recognition Program |
| 12/7/2006 | Eastern Colorado Area Office Safety & Health Program, Chapter 9; Area Safety Recognition Program |
| 10/31/2008 | Office-Wide Safety Awards, GP Memo SAF -02, Michael J. Ryan |
| 10/2011 | Klamath Basin Area Office, Safety Awards Program FY 2011 |
| 5/24/2006 | Northern California Area Office, Safety Incentive Awards Program, Brian Person |
| 5/20/2011 | PN Regional Office Safety Incentive Program, Regional Policy Letter SAF-1.00-3040-6, Karl Wirkus |
| 5/4/2012 | Exception to PN Regional Office Safety Incentive Program Policy Letter, SAF-1.00-3040-6, Lorri J. Lee |
| 6/19/2014 | PN Region, Innovate Safety Suggestion Program Business Practice, Lorri J. Lee |

Appendix B

Commissioner's Safety Award Criteria (2014)

1. Demonstrated safety leadership
2. Demonstrated continuous improvement
3. Contributions to Reclamation Safety Program
4. Safety articles for publication
5. Regional Director's personal involvement in safe practices
6. Safety education quality and thoroughness
7. Development of a safety system between an operator and equipment (best practice)
8. Making a special effort to improve a specific aspect of safety within the workplace
9. Percent of annual inspections complete
10. Number of deficiencies found
11. Number of deficiencies corrected
12. Promoting wellness within the region
13. Number of activities to communicate safety to employees
14. Number of activities to promote safe driving
15. Number of serious accident investigations
16. Including safety in a strategic plan

Appendix C

Awards, Incentive, and Recognition Programs

1. USGS Honor Awards Guide, 5/2014, contains an Occupational Health and Safety Award for the programs, groups or individuals who have made special contributions to SOH.
2. DOI Aviation Safety Awards Program establishes awards for the Office of Aviation.
3. Fire Agencies, including the Bureau of Land Management, have established various awards to honor safety accomplishments in the Fire Program (Interagency Fire Center), such as the annual National Wildland Fire Safety Award. The common theme in these awards is personal or group accomplishments in conducting the work safely, or contributions to overall program improvement.
4. The Bureau of Land Management requires that safety performance elements are included in managers, supervisors, and employees performance plans. Awards are based on these criteria as with any other performance element. BLM presents a number of awards related to safety, including the Director's Safety Award. Similar to Reclamation, use of the award programs vary in that not all State Directors present the same awards.

Appendix D

Supervisor Toolbox

These are a variety of safety concepts that should be considered for enhancing safety awareness throughout Reclamation; the list is not all inclusive.

Tiered awards approach

Establish awards/recognition at the Regional and local levels, and communicate specific criteria during program roll-out to ensure transparency.

Examples of Tiered Awards

- Interior – Listed in Parts 370 and 451
- Reclamation Awards
 - Commissioner, Safe Driving, Construction Safety, Most Improved, and Innovative Safety
- Regional Awards
 - Regional Director's, Fleet Safety, Suggestion, Safety Champion, Most Improved, and Innovative Safety
 - RD's Safety Coin
- Area Office and local offices
 - Safety Team (Group) Awards – plaques
 - Individual, "STAR" (Branded specifically for safety)

Safety Pledge

Each Regional Director can sign a safety commitment pledge demonstrating commitment to Reclamation's Safety Vision. Supervisors and employees would be encouraged to sign as well.

Safety Survey

Create a survey that evaluates employee perceptions of safety program accomplishments and implementation measures to reduce injury and promote safety awareness.

Suggestion Box

Create an online suggestion box, as well as physical box located at each building. Each type of suggestion box would have restricted access limited to the Safety Officer. This concept enables employees to anonymously report concerns or issues without fear of reprisal.

Staff Training Calendar

Establish an annual training calendar of basic Safety 101 topics. Continue or establish safety discussions at employee meetings. Presentations could

be presented by employees with the assistance of the safety representative or other safety staff.

Safety Minute

Initiate the practice that office gatherings, staff meetings, and the holiday parties hold a “safety minute” to increase awareness of incidents or risks associated with the activity.

Safety Brainteasers

Develop crosswords, jumbles, riddles, etc. related to safety or health topics. Include in staff meetings, trainings, or newsletters.

Regional Newsletter or Monthly Safety Article

Include safety articles in local newsletters related to seasonal or topical information, trends, and inspection dates and results. The published information could also address Regional injury and illness data, or steps for accessing the Region’s occupational health and safety management system data (e.g., Regional safety procedures, Reclamation Safety and Health Standards, etc.). This ensures that safety topics are disseminated in existing and accepted communication media that reaches a wide group of employees without overwhelming them.

Coaster and Poster Initiative

Develop a safety coaster/poster design contest that includes employees and their children. Manufacture and distribute winning contributions (e.g., each office displays a poster of the winning entry, or each employee receives [or winning contributors participating in the safety incentive program receive] a coaster representing the winning art work). This activity is designed to increase safety awareness, whether as a contestant, judge, or contest coordinator.

Stand Down Day

Hold an employee “safety day” or “stand down day” similar to military safety outreach efforts, e.g., a “fire muster” could engage personnel in fire awareness along with events that time entrants’ performances, such as a “hose lay” (unravel and assemble hose), or “bucket brigade” (extinguish a controlled fire). The individuals/teams/divisions with the best times receive an award and/or recognition. The fire muster may include representatives from a local fire department, who could serve as coaches and provide auxiliary fire equipment. Contests, such as this team building event, motivate participation and build enthusiasm.

Some offices in Reclamation have employed safety days or a safety week that include safety quizzes, safety Jeopardy (modeled after the popular television show), reviews, and/or demonstrations of safety equipment by the safety manager and/or vendors. Personnel may be separated into

groups to review and comment on current safety practices or policies, or attend seminars taught by outside contractors on topics such as ergonomics or OSHA compliance in the office and in the industrial setting.

Sign or Slogan Contest

A “safety sign” (e.g., LED screen or manual/static display) can be placed near the main entrance of each office building. The slogan, motto, or picture can rotate periodically, with employees contributing the selected idea or creating the product receiving awards and/or recognition. To further engage employee safety involvement, employees would serve as judges to select the winning contribution.

PPE Personalization

Evidence supports that employees are more likely to wear PPE when it fits correctly and is comfortable. Adding a personalized or customized touch to a hard hat (e.g., sports themes, turtle shell themes, or even shaped as cowboy hats) provides a positive incentive and encourages an employee to wear the PPE.

Recognition in a Special Club

Some companies create “clubs” to encourage the wearing of PPE. At one company, membership in the “Turtle Club” was gained by those employees who could have sustained a head injury if they hadn’t been wearing their hard hat. Similarly, the “Wise Owl Club” had members who could have sustained an eye injury if they hadn’t been wearing their safety glasses. Members also received a certificate of membership. Such recognition can be a strong motivator.

Reclamation Coin

Consider implementing a “Reclamation Safety Coin”, an “on-the-spot” recognition program very similar to the military’s “Unit Challenge Coin” program in the military. The Regional Director, Deputies or an Area Managers would award the “Safety Coin” to employees observed conducting work in a safe manner.

Appendix E

Regulations and Directives

Office of Personnel Management

- 5 CFR Chapter 1
 - 451.102 - 106 Defines an “award” as an action to recognize and reward individuals and teams that achieve organizational goals, or improve effectiveness, efficiency, and economy.
 - Awards include incentives, which are based on predetermined criteria. An award program is defined as procedures and requirements for granting of awards as per Title 5, Chapters 43 and 45.
 - Agencies shall develop one or more award programs, and shall communicate, justify awards, and maintain records of awards.
 - Agencies are encouraged to involve employees in developing programs.
 - The awards programs should not conflict with or violate any other law or government-wide regulation.
 - Dated: 1/1/2006

Department of Labor, Title 29

- Occupational Safety & Health Administration, Recording and Reporting Occupational Injuries and Illness
 - Part 1904.36, Section 11(c) of the Act prohibits the discrimination against an employee for reporting a work-related fatality, injury, or illness. It protects an employee for making a SOH complaint.
 - Dated: 1/19/2001
- Anti-Retaliation, Employer Safety Incentive and Disincentive Policies and Practices (<https://www.osha.gov/as/opa/whistleblowermemo.html>)
 - Interpretive letter that discusses potential adverse reporting impacts of certain types of incentive programs.
 - Dated: 3/12/2012
- Part 1960, Basic Program Elements for Federal Employee SOH Programs (<http://www.gpo.gov/fdsys/pkg/CFR-2011-title29-vol9/pdf/CFR-2011-title29-vol9-sec1960-11.pdf>)
 - Subpart B, Part 1960.11 Evaluation of SOH performance.
 - Performance evaluation of management, supervisors, or other employees in meeting requirements consistent with responsibility and authority.
 - Recognition of superior performance in discharging SOH responsibilities should be encouraged.
 - Dated: 7/2011

Department of the Interior

- Departmental Manual, Part 485, Chapter 10, Safety Management Awards
 - Specifies the minimum SOH requirements for Departmental recognition of bureau performance. Each bureau may establish a system to recognize and promote safety and health performance.
 - Dated: 3/12/1999
- Departmental Manual, Part 485, Chapter 2, Responsibilities
 - Identifies responsibilities for implementation of SOH Policy.
 - Head of Bureau is responsible for providing recognition to employees for SOH performance; Designated Safety & Health Official establishes safety committees to provide for employee involvement; Bureau SOH Manager develops SOH promotion/awareness plans; and SOH committees provide communication and encourage employees to be safe during and off-duty.
 - Dated: 3/12/1999
- Departmental Manual, Part 370, Chapter 451, subchapter 1
 - Policy for an Awards and Recognition Program. Establishes categories of Awards: Performance, Honor, Monetary, Non-monetary, and Outside.
 - Criteria mentioned: approval at the lowest level, timely recognition, reduced paperwork, and presentation that supports significance of the recognition. Allows for refreshments when ceremony would be materially enhanced by light refreshments.
 - Dated: 7/16/2008
- Departmental Manual, Part 370, Chapter 451, subchapter 3
 - Honor Awards acknowledge professional accomplishment at DM.
 - Safety Awards section E (4) references 485 DM 10.
 - DOI Safety Awards given: Award of Merit, Professional Service, and Outstanding Service Award.
 - Suggests bureaus have award committees to provide nominations to the Department.
 - Dated: 5/6/2009
- Departmental Manual, Part 370, Chapter 451, subchapter 5
 - Basis: EO 13589 modifies non-monetary recognition.
 - Prudent use of public resources for non-monetary awards. Encourage time-off and STAR awards.
 - Upper limit of \$50 per year per employee.
 - Recommended certificates, letters in lieu of procured items. Non-monetary awards suggested items are office products.
 - Gift cards may not be used for non-monetary awards.
 - Promotional items (short list includes t-shirts) may not be used for employee recognition.
 - When appropriate, award item should contain the bureau name, logo, award title, and/or mission.
 - Dated: 2/5/2013; Clarifies memo dated 11/21/2012

Bureau of Reclamation

- Reclamation Manual, ADM 06-01, Non-monetary Awards
<http://www.usbr.gov/recman/adm/adm06-01.pdf>
 - Applies to all non-monetary awards
 - Purchase must be from Corporate Material Blanket Purchase Agreements (BPAs) and only be approved by each Region's designated ordering official.
 - Similar to DOI guidance with the following restriction, "Clothing (i.e., jackets, T-shirts, etc.) is not authorized as non-monetary awards."
 - Items must be suitable for public presentation. Non-monetary awards will contain Reclamation's or Department's name, logo, award title, and/or mission, where appropriate, and must be VI compliant.
 - Dated: 4/24/2014
- Reclamation Manual, SAF P-01, Safety & Occupational Health Program
 - Policy. Implement ANSI Z10 principles. Involve employees and their representatives in the development and implementation of the SOH Program's processes, plans, and procedures specific to their workplaces. Communication of policy.
 - No mention of award programs, incentives, or recognition.
 - Dated: 7/23/2013
- Reclamation Manual, SAF 01-01, Occupational Safety & Health – General
 - D&S. Implementation guidance, B (10) Safety and Health Awards. General instruction to recognize outstanding individual or group achievements through awards.
 - Needs additional implementation instructions and designation of responsibility for promoting SOH Program.
 - Opportunity to engage employees through awards program and modification of responsibilities.
 - Dated: 1/26/2010

Sequestration Policy

Executive Order 13589, Promoting Efficient Spending

- Section 7. Extraneous Promotional Items. Agencies should limit the purchase of promotional items (e.g. plaques, clothing, and commemorative items), in particular, where they are not cost-effective.
 - The EO does not impair the existing authority for a department or agency, or head.
 - Dated: 11/9/2011

Funding and Acquisition Policy

Department of Labor, Occupational Safety & Health Administration

- 29 CFR 1960.7, Basic Program Elements for Federal Employees

- Financial Management. (http://www.ecfr.gov/cgi-bin/text-idx?SID=5fac06ae8491a62db5d78b35012ef524&mc=true&node=se29.9.1960_17&rgn=div8)
- 1960.7(b) the Designated Agency Safety and Health Official ... is responsible for requesting resources
- 1960.7(c) resources for an agency's SOH program shall include, but not limited to: 1960.7(c)(5) Program promotional costs such as publications, posters, or films.
- Dated: 45 FR 69798, 10/21/1980, as amended at 78 FR 47190, 8/5/2013

Department of the Interior

- Interim Guidance Clarification for DM 370, 451.5, Non-monetary Awards
 - Dated: 2/5/2013
- Acquisition Policy Release (DIAPR) 2012-10
 - Establishes process and controls over promotional item spending. Does not apply to non-monetary awards.
 - Promotional items cannot be purchased with Federal funds, including items for distribution at meetings, job fairs, and promotion of initiatives or appropriated programs. Must demonstrate authority exists in appropriate language for acquiring and distribution promotional items to justify purchase to carry out mission; if no authority exists, "necessary expense doctrine" shall be used. Applies to all promotional items. No minimum dollar applies.
 - Approval for promotional items by the Bureau Procurement Chief. Must explain why the purchase is appropriate. Quarterly reporting.
 - Dated: 8/24/2012
- Acquisition Policy Release (DIAPR) 2012-10, Amendment 2
 - Continue to follow a process for the approval and tracking of promotional item purchases. No longer are required to submit a quarterly report.
 - Dated: 3/14/2014

Bureau of Reclamation

- Acquisition Circular (RAC) No. 12-17, Approval Process For Promotional Item Purchases
 - Process and controls over promotional item spending. Does not apply to non-monetary awards.
 - Date: 9/12/2012
- Purlbook 2015 (<http://intra.usbr.gov/mso/aamd/chargecard-purchase-promotional.html>)
 - Awards, Non-monetary are permitted with approval, ADM 06-01 <http://www.usbr.gov/recman/adm/adm06-01.pdf>.
 - Promotional Items are permitted with approval. Absent specific authority, appropriated funds may not be used for promotional items. Follow RAC 12-17 (listed above.)
 - Dated: 6/2015