RECLAMATION

Managing Water in the West

Safety and Occupational Health
Action Team 15

Area-Wide Baseline Facility Assessments

Report

U.S. Department of the Interior
Bureau of Reclamation
May 2015

Safety Vision Statement

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.

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Reclamation Area-Wide Facility Baseline Assessments

Prepared by:

Safety Action Team 15

Russell Anderson, Power Resources Office
Rebecca Fulkerson, Commissioner's Office
Dan Mitchell, Upper Colorado Region Office
Jeff Smith, Lower Colorado Region Office
Brian Wagner, Four Corners Construction Office

Bruce Muller, Jr.; Security, Safety and Law Enforcement; Executive Sponsor

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List of Acronyms

AIHA	American Industrial Hygiene Association
ANSI	American National Standards Institute
CFR	Code of Federal Regulations
DASHO	Designated Agency Safety and Health Officer
DM	Departmental Manual
D&S	Directive and Standard
DOI	U. S. Department of the Interior
EO	Executive Order
FPA	Focused Program Audit
RLT	Reclamation Leadership Team
RSHS	Reclamation Safety and Health Standards
SME	Safety Management Evaluation
SOH	Safety and Occupational Health
SSLE	Safety, Security and Law Enforcement Office
Z10	American National Standard for Occupational Health and Safety Management Systems - 2012

Executive Summary

Safety Action Team 15 was established to review policy and improve Area-Wide Baseline Facility Assessments. The objectives for the baseline assessments are to:

1) Establish a baseline from which future program improvement can be measured;

2) Utilize assessment findings for strategic planning at each organizational level.

The team reviewed existing processes within Reclamation Safety and Occupational Health (SOH) Office, which with revision, could address these objectives. These changes would require clarifying roles and responsibilities in Reclamation's safety organization so that assessment efforts are effective.

In summary, the team recommends the following:

1) **Facility:** Facility management will continue efforts to implement ANSI Z10– *The American National Standard for Occupational Health and Safety Management Systems (Z10)*, including process reviews, audits and management reviews. This initial assessment would be the baseline for monitoring improvement. This should involve facility employees, supervisors, collateral duty or full-time safety personnel and managers.

2) **Region/Area:** Continue annual facility inspections and expand the scope to include program and management system elements identified in Z10. This change should be reflected in D&S SAF 01-06, *Facility Inspection and Abatement*, or in a new D&S. Annual safety inspections are the responsibility of Reclamation's safety staff. These inspections would serve as an independent audit for each facility and also provide feedback for Regional/Area program. Regional/Area offices should use the DOI Evaluation Tool, and as they gain experience, improve the tool to address all of the Z10 management systems.

3) **Reclamation:** Continue implementation of the Safety Management Evaluations (SME) process and integration of Z10 management-system elements. Revise procedures for Reclamation SOH Office's SME to evaluate Regional/Area program implementation. Fully implement existing Reclamation policy which would include the expanded requirements for SMEs in D&S SAF 01-01, *Occupational Health and Safety – General*.

Background

Historical Overview

The Department of the Interior's [DOI] Office of Occupational Safety and Health reviewed Reclamation's Safety and Occupational Health [SOH] Program in July 2013. A weakness identified in its report noted that Reclamation has, "… not established accountability systems to ensure effective implementation of the SOH program at the working level ….With the adoption of SAF P01 [*Safety and Occupational Health Program*], Reclamation has the opportunity to launch concerted action around this policy and Z10 *[The American National Standard for Occupational Health and Safety Management Systems]* principles that include business practices and management systems to establish a much improved safety culture over time ….The SOH Evaluation Team encourages Reclamation leadership to build off its strengths and this policy initiative to take the safety program to the next level and establish a sound safety culture throughout all levels of the organization."

In addition, DOI stated in their assessment, "Reclamation senior leadership is committed to establishing a strong safety and health program and many of the resources and basic elements/systems for a strong program are in place. However, a positive safety culture is yet to be established within line management and worker ranks. Accountability, responsibility, and ownership are not yet embedded within the Reclamation workforce to demonstrate and achieve Reclamation's stated goal to develop and implement safety and occupational health as a core value."

In response to the DOI draft findings, Reclamation initiated a Safety Rapid Improvement Team. Their efforts led to the formation of twenty-one Safety and Occupational Health Action Teams (SOH Action Teams). SOH Action Team 15 (Team 15) was tasked to review processes related to Area-Wide Baseline Evaluations.

Team 15's objectives as outlined in the Documentation of Action, ***Area-Wide Baseline Evaluations***, are to:

1) Review the ***DOI Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool*** (DOI Evaluation Tool) and determine how to apply it across Reclamation;

2) Develop an evaluation tool;

3) Develop an implementation strategy
    a. Consider consistency of evaluations
    b. Efficiency
    c. Long-term ability to reevaluate
    d. Outline records keeping processes
    e. Develop a follow-up strategy and timeline

4) Make evaluations relevant
    a. Responsibility
    b. Accountability

Team Tasking and Project Management Plan

Reclamation leadership provided each SOH action team, latitude in the development of team goals and objectives. Following team formation, a SOH Action Team White Paper[1] outlining goals and objectives was drafted. Copies of the related project management documents are included in Appendix A. The White Paper, which subsequently was the basis for the Team's Project Management Plan, focused the scope of the team's efforts as follows:

1) Policy Review. Review of existing supporting policy and procedures. If policy gaps are identified, suggest practical measures to address them;

2) Safety Program Assessment Survey. Identifying existing program assessment processes in use within Reclamation;

3) ANSI-Z10. Evaluate the team's objectives relative to Reclamation's Z10 implementation efforts;

4) Implementation - Safety Program Assessments. Provide implementation strategy, including goals and objectives, leading to the completion of meaningful facility-level safety program baselines (and annual) assessments;

Policy Review – Safety Program Assessment

A review of relevant regulation, policy and guidelines was completed. A summary of observation follows:

1) There are several resources that require Agencies to have an effective SOH program.

2) An evaluation of SOH programs at a Regional/Area/facility level is not covered in most documents.

3) Requirements in the Reclamation manual are vague and provide the user little guidance.

4) DM 485 Part 5 requires program evaluations every three years. However, these are headquarters-level evaluations and require only "periodic" evaluations of SOH program implementation in regions and other subordinate offices.

[1] *White Paper – Facility Baseline Assessment Team.* August 2015 *pg. 1*

5) DOI's Evaluation Tool contains some helpful information for program evaluations. It is unknown if the Regions and local office are aware of this document or if it is used for evaluations.

A summary of policy is included in Table 1 below and copies of referenced policies are included in Appendix B.

Table 1: Policy Analysis Summary - Facility Safety Program Assessments

Reference	Program Assessment Requirements	Comments
CFR Part 1960 (subpart J) Evaluation of Federal Occupational Safety and Health Programs	The purpose of this subpart is to establish a comprehensive program for the evaluation of Federal employee SOH programs. -Agency heads shall develop and implement a program for evaluation the effectiveness of their agency's SOH program. -The Secretary shall conduct a comprehensive evaluation of each Federal agency's SOH program. Evaluations shall be conducted on a regular schedule… The Secretary shall submit to the president each year…	Provides Agency level requirement to have a safety program and evaluate it on a regular basis.
Executive Order (EO) 12196	Outlines agency requirements for a SOH program at the agency-level.	Similar to 1960 subpart J
485 DM 5	…will conduct evaluation that includes assessments of the extent to which the program conforms with the requirement of EO 12196, CFR Part 1960 (subpart J – evaluation of Federal Occupational Safety and Health Program)	
DOI Evaluation Tool	As required in DM 458 part 5 (above) DOI developed *Handbook to Guide Completion of the Safety and Health Program Evaluation Tool.* Component 4: Evaluation and Analysis (pages 74 – 79) provides guidance for OHS program evaluations.	The handbook provides good reference material on program evaluations.

Directive and Standard (D&S) SAF P0-01 Safety and Occupational Health Program	Commissioner is responsible for the development, implementation, and evaluation of Reclamation's SOH Program	How is this accomplished? No real guidance or requirement.
	Reclamation Leadership Team (RLT) is responsible for assessing information from SOH Program reviews; and directing actions for continuous improvement.	
	Supervisors are responsible for ensuring that the workplace and equipment under their direction are maintained in a safe and healthful condition, and in compliance with applicable SOH requirements.	This could be interpreted as more of a facility inspection element than an evaluation.
D&S SAF 01-01 Occupational Safety and Health – General	Safety, Security and Law Enforcement (SSLE), Reclamation SOH will develop, promote, and act as lead in the periodic evaluation of the implementation of Reclamation's SOH Program	How is this accomplished? At what frequency and how many facilities?
	Directors will periodically assess SOH performance of managers/supervisors/leaders	What does periodic mean? How is performance assessed? How are managers held accountable? How are employees held accountable?
	Establish a comprehensive safety and health analysis of workplaces which identifies safety and health needs.	Vague
	Establish a system of inspections of all facilities and operations in accordance with regulations, standards, codes, and directives.	Inspections verses evaluations…what is the connection?
D&S SAF 01-06 Facility Inspection and Abatement	Requires annual workplace inspections	Describes a requirement for inspections but not program evaluations.

	Reclamation SOH Manager will provide an annual summary of Reclamation inspection finding to the Reclamation Leadership Team (RLT)	
	Describes who, what, and when inspections will take place	
	Requires DOI Designated Agency Safety and Health Officer (DASHO) to ensure satisfactory completion of SOH program evaluation on a three year basis	How is this accomplished?
	Develop a standard evaluation tool	See next section
	Requires SOH program evaluations every 3 years at both the DOI and bureau-level (only a sampling of field locations are reviewed)	Does not require evaluations at each facility
Z10	Defines minimum requirements for an occupational health and safety management system. Appendix L describes program audits.	Written for private companies but contains easy to understand guidance for a successful OHS program including evaluation (audit) of the program.

Survey - Safety Program Assessment Practices

A survey was sent out in August 2014 to get an idea of what employees' perceptions of facility program assessments. A copy of the results of the survey is included in Appendix C. The survey had about a fifty-eight percent response rate, and covered various programs from power; dams; Program, Area, and Regional offices. General observations are as follows:

1) The program assessment objectives were met by using job hazard analyses (JHAs);

2) Confusion between annual safety facility inspections and program assessments;

3) Unclear whom is responsible for safety program assessments;

In addition to the survey, the team also noted that the Reclamation SOH Office had augmented their safety program assessment processes in response to DOI's 2013 safety program assessment. Implementation of new program assessments included Safety Management Evaluation (SME) and Focused Program Audits (FPA).

The SME is completed by the Reclamation SOH Office. The SME is completed for each region on a three year rotating schedule. The evaluation consists of reviewing the implementation of the programs and management systems by taking a cross-section of the program from the regional level down to facilities. Assessment elements mirror DOI's Safety Program Assessment Tool and includes six elements: Management Leadership, Employee Involvement, Hazard Prevention and Assessment, Evaluation and Analysis, Training and Awareness, and Program Implementation and Operation. A copy of Reclamation SOH Office's SME procedure is attached in Appendix D.

The SME process is augmented by FPAs. At regions where an SME is not scheduled for that year an FPA is completed. The FPA has a reduced scope from that of an SME. It focuses on implementation of preselected compliance programs such as confined space, hazardous energy control, hazard communications or facility safety inspections.

ANSI-Z10

As delineated in D&S, SAF-P01, a review of the team's objectives and their relationship to this standard was completed. The review identified four types of assessment activities within the standard each occurring at different phases in Z-10's "***Plan, Do Check and Act"*** management cycle:

1) Review Process [2];

2) Assessment and Prioritization[3];

3) Audits [4];

4) Management Review" [5];

These elements are summarized below along with a discussion of the correlation of Team 15's objectives with Z10.

"Review Processes" within Z10's plan phase are completed on an ongoing basis by the organization to identify the status of their safety management system with the standard. This may be referred to as a "gap analysis".[6]

Following the organization's review process, management system issues should be assessed and prioritized so that resources can be focused on those issues that offer the greatest opportunities for improvement and risk reduction.[7] The outcome should result in documented program objectives (i.e. Safety Action Plan).[8]

The organization should focus on those program elements that would provide the greatest opportunities for improvement and risk reduction[9]. As these processes are considered to be "ongoing" they are critical to the organization's ability to achieve "continual" improvement and should be implemented at the operational or facility level.

In our review of Z10, the objectives for completing Area-Wide Baseline Facility Assessments are captured in Standard's Audit requirements. Audits are to be completed by competent individuals external to the activities or programs being examined. Audits are a sub-element of the Evaluation and Corrective Action of Z10. The Standard states that the organization should plan and conduct periodic audits to assess the organization's conformance.[10] These audits are "system" rather than "compliance" oriented.

"Management Review", which occurs in the Act phase, includes processes used by the top management at the operational level to assess the overall program, at least annually. This

[2] Z10-2012 4.1
[3] Z10-2012 4.2
[4] Z10-2012 6.3
[5] Z10-2012 7.0
[6] Z10-2012 E4.1
[7] Z10-2012 E4.2
[8] Z10-2012 4.3
[9] Z10-2012 E4.3
[10] Z10-2012 6.3

management system element is integral to the Z10 process and therefore, should be completed at the operational level of the organization. The management review identifies opportunities for improvement and ensures the system's continued suitability, adequacy, and effectiveness. The review process would include:

1) Progress in risk reduction, effectiveness in addressing underlying causes of risks and system deficiencies

2) Input from employees, status of corrective and preventive actions and changing circumstances

3) Follow-up action from audits and previous management reviews

4) The extent to which objectives have been met

5) The performance of the system relative to expectations.

Evaluation Tools

Safety program elements are found in Z10 and the DOI Program Evaluation Tool (Appendix D), however, not all of the management systems found in Z10 are included in the DOI Evaluation Tool. Since Reclamation is already using the DOI Evaluation Tool, it is a good starting point for Regional and Area office to perform Area-Wide Baseline Facility Assessments.

Significant gaps and differences between Z-10 and the DOI Evaluation Tool were identified. The DOI Assessment Tool did not effectively address planning and program review processes. Also noted, several elements identified in Z10 were much broader than delineated in the DOI Assessment Tool. For example, Z-10 encourages employee participation in all aspects of the safety program including planning, implementation, assessment, incident investigations and management reviews. Although use of safety committees is a mechanism to involve employees – it may not achieve the intent of Z10. A table comparing DOI's Assessment Tool to Z10 is included below.

Table 2: Comparison of Z10 and DOI Safety Program Assessment Handbook

- Missing
- Scope of element is significantly less

ANSI Z10:2011		**DOI Evaluation Handbook**	
Section	**Criteria**		**Criteria**
1.0	Scope, Purpose, Application		
1.1	Scope		
1.2	Purpose		
1.3	Application		
2	Definitions		
3.0	Management Leadership and Employee Participation	1	Leadership and Management

3.1	Management Leadership	1 (i)	Commitment, Involvement and Communication
3.1.1	Occupational Health and Safety Management System	1.(i)(1)	
3.1.2	Policy	1. (i)(1) 1.(v)	Occupational safety and health policy document. Policy
3.1.3	Responsibilities and Authority	1(ii) 1.(iv)	Responsibility and Accountability Leadership and Management: Personnel Resources (Size and Technical Skills of Staff)
3.2	Employee Participation	2.(i) 2.(ii)	Employee Involvement: Safety Committees Program Involvement – Orientation, OSHA poster, reporting process.
4	Planning		
4.1	Initial and Ongoing		
4.2	Assessment and Prioritization	3.(i)	Hazard Recognition and Prevention: Inspection, Identification and Prioritization of Deficiencies
4.3	Objectives		
4.4	Implementation Plans and Allocation of Resources	1.(iii)	Leadership and Management: Financial Resources
5	Implementation and Operation		
5.1	OHSMS Operational Elements	3.(ii)	Hazard Recognition and Prevention: Hazard Control and Abatement
5.1.1	Risk Assessment		
5.1.2	Hierarchy of Controls		
5.1.3	Design Review and Management of Change	3.(iv)	Hazard Recognition and Prevention: Process/Operational Analysis – Management of Change
5.1.4	Procurement	6.(vii)	Program Implementation and Operation: Procurement and Design Review
5.1.5	Contractors	6.(vi)	Program Implementation and Operation: Contractor Safety
5.1.6	Emergency Preparedness	6.(iii) 6.(iv)	Program Implementation and Operation: Fire Protection and Prevention Program Implementation and Operation: Occupant Emergency Planning
5.2	Education, Training, Awareness, and Competence	5.(i)	Training and Awareness: Mandatory Safety and

		5.(ii) 5.(iii) 5.(iv)	Occupational Health Training Training and Awareness: Training for Occupational Health Professionals Training and Awareness: Training for Collateral Duty Safety and Health Officers and Safety Committee Members Training and Awareness: Promotion and Awareness Programs
5.3	Communication	1.(vi)	Leadership and Management: Program Promotion and Recognition
5.4	Document and Record Control Process		
6	Evaluation and Corrective Action		
6.1	Monitoring, Measurement and Evaluation	6.(ii)	Program Implementation and Operation: Industrial Hygiene and Occupational Medicine
6.2	Incident Investigation	3.(iii) 6.(i)	Hazard Recognition and Prevention: Reports of Unsafe and Unhealthful Conditions Program Implementation and Operation: Accident Reporting and Investigation
6.3	Audits		
6.4	Corrective and Preventive Action	4.(ii)	Evaluation and Analysis – Accident Analysis and Prevention
6.5	Feedback to the Planning Process		
7	Management Review		
7.1	Management Review Process	4.(i)	Evaluation and Analysis – Program Evaluation and Assessment
7.2	Management Review Outcomes and Follow-up	4.(ii)	Evaluation and Analysis – Data Analysis. Metrics, Management Review/Follow-up
Not Covered in Z10	Evaluation of Compliance	6.(v) 6.(viii)	Program Implementation and Operation: Motor Vehicle and Motorized Equipment Program Implementation and Operation: Specialized Programs and High Hazard Operations
	Legal and Other Requirements		

Implementation Plan – Area-Wide Baseline Facility Assessments

After review of policy documents, survey results, existing program assessment procedures, and comparison to best practices as outlined in Z10, the following implementation approach is recommended. This approach takes advantage of existing internal assessment practices which will enhance long-term sustainability. A layered program assessment approach, outlined below, would meet Reclamation's needs at various organizational levels.

1) **Facility:** Facility management will continue efforts to implement Z10, including process reviews, audits and management reviews. This initial assessment would be the baseline for monitoring improvement. This should involve facility employees, supervisors, collateral duty or full-time safety personnel and managers.

2) **Region/Area:** Continue annual facility inspections and expand the scope to include program and management system elements identified in Z10. This change should be reflected in D&S SAF 01-06 or in a new D&S. Annual safety inspections are the responsibility of Reclamation's safety staff. These inspections would serve as an independent audit for each facility and also provide feedback for Regional/Area program. Regional/Area offices should use the DOI Evaluation Tool, and as they gain experience, improve the tool to address all of the Z10 management systems.

3) **Reclamation:** Continue implementation of the SME process and integration of Z10 management-system elements. Revise procedures for Reclamation SOH Office's SME to evaluate Regional/Area program implementation. Fully implement existing Reclamation policy which would include the expanded requirements for SMEs in D&S SAF 01-01.

CONCLUSION

The team's review provided clarification on the scope and work effort. Significant confusion in terminology of existing policy regarding Area-Wide Baseline Facility assessments was noted. Insight was gained from the review of the Z10.

Corrective actions should include fully implementing D&S SAF 01-01. Additionally, Area-Wide Baseline Facility assessment requirements should be included into the D&S, options are revising SAF 01-06 or drafting a new D&S.

Appendix A – Project Management Documents

Documentation of Action

Area Wide Baseline Evaluations

Lesa Stark
V2 2/28/14

Definition of Action

This action is titled Area Wide Baseline Evaluations. The purpose of this action is to establish a Reclamation wide baseline understanding of where individual Reclamations offices rate related to the DOI SOH criteria.

Reclamation overall rating in 2013 was as 3.3 out of 5 however this rating was based on just a small fraction of Reclamation offices. This action would extend the DOI SOH evaluation process to all Reclamation offices to get an understanding of how individual offices currently rate. The DOI SOH evaluation tool is the standard of evaluation by which Reclamation was rated in 2013 and will be judged by in the future, therefore this tool (handbook) should be adopted as our evaluation criteria so that Reclamations internal evaluation process is in alignment with the DOI criteria

Area Wide Baseline Evaluations conducted in 2014 will establish a baseline to from which future evaluations could be compared to. A comparison of current conditions to future condition is one of many ways to measure improvement. Insert Monty's example of 5 levels of performance (was this taken from the DOI SOH?) it is expected that not all offices will be performing at the same level, this evaluation tool can be used to help Reclamation focus on the lower performers first.

The baseline evaluations should not be judged. It should be viewed as a starting point to work from to collectively implementing actions to improve the ratings. This evaluation would provide a tool to measure success. The desired outcome will be to bring all areas up to a common level.

To utilize this tool effectively there will need to be regular revaluations. The team will need to discuss intervals and long term commitments to continued monitoring and evaluating progress.

Deliverables

1. Establish **an Area Wide Baseline Evaluation Team** to research/review the DOI SOH evaluation tool (handbook) and determine how best to apply it to Reclamation at an area wide level. All efforts should be made to keep Reclamations evaluations as closely aligned with the DOI SOH evaluation handbook as possible.
2. Evaluation team will develop recommended **evaluation tool**
3. Evaluation team will develop an **implementation strategy** for the evaluation tool
    a. Consider how to maintain consistency in the application of the evaluations.
    b. Consider how to efficiently conduct the evaluations (time and travel)
    c. Consider long term ability to reevaluate
        i. Several methods for implementation were identified ranging from self evaluation, Area level evaluation teams, regional level evaluation teams,

Denver level evaluation teams and or combination of different levels of evaluation.

d. Evaluation team should develop a process for keeping records and determine who will have access to the evaluations. At a minimum all evaluation should be available at the local SOH level and at the Denver SOH level and will become Reclamation baseline.

4. Evaluation team should consider and make recommendations on how to make the evaluations relevant and make sure they are not just stuck in a notebook. Consider who is responsible for accountability and how accountability should be defined. Consider accountability such as ratings improvements will be ties to the Area Manager performance. SOH will work with the AO to improve rating.
5. Evaluation team will develop a **follow up strategy** and time line

Relationship to SOH Evaluation Criteria

This action aligns with the Evaluation and Analysis secton of the DOI SOH evaluation criteria. Area wide evaluations will provide the benchmark from which to measure and evaluate future progress.

Timeframe

The definition of baseline is to capture the picture at the beginning of the process so this action should be completed ASAP after the approval of the action plan. A realistic goal may be no later than one year after the approval of the action plan.

1. Team research DOI evaluation criteria and to develop evaluation criteria and application tool for area wide evaluations. 2 months
2. Develop implementation plan
3. Develop follow up strategy
4. Train other to apply evaluation tool SOH 1 month
5. Conduct Evaluations 6 months

Opportunities for Employee Engagement

Once the evaluations are completed the evaluations should be shared with individual area employees. Employees should participate in developing an action plan for their particular facility with the objective of improving their evaluation ratings in the future.

Roles/Responsibilities

1. Directorate: Security, Safety and Law Enforcement (SSLE)
2. Implementing parties: Implementation would include considerable assistance from All Regional Directors and Area Managers and the Members of the Safety and Occupational Health Council.

Resource Estimate

Total $100K in staff time

1. Staff time - One SOH council member to lead the team @ 25% time for 6 months 30-40 days @ 800/day (GS 13) = $24 -32k staff time
2. Staff time -Team comprised of SOH staff from each Area/Region/Denver (4 all together) 2 months at 20% time to complete and agree on tool and agree on implementation strategy. 40 man days @800/day =$32K
3. Travel for the team to develop the action plan $10K may or may not need this.
4. Staff time for conducting evaluations
    a. Assuming self -evaluation no additional travel costs. Staff time would be necessary. Number of facilities x time it takes to do the assessment. Assume a 4 hour assessment tool x number of facilities: approximately 100
        i. 58 power facilities
        ii. RO 5 / AO 35 / TSC buildings 2
    b. Staff time 100 evaluation at 4hr/evaluation = 400 hours (or 50 days) @ GS 13 800/day = $40K

Potential Metrics

100% of Reclamation facilities and offices are evaluated in the first year. Team to flush out long term metrics.

Safety and Occupational Health (SOH) Project Management Plan (REVISED)

Team Number and Name:	**Team 15 Facility Baseline Assessments**	Date Submitted:	December 8, 2014
Account Structure/Cost Authority:	**RX.59999823.T150000**		
Team Leader (name/code):	**Dan Mitchell/UC-1010**	Contact Information: (phone/e-mail):	**801-524-3636/dmitchell@usbr.gov**
Executive Sponsor (name/code):	**John Baals/84-4000**	Contact Information: (phone/e-mail):	**303-445-3736/Jbaals@usbr.gov**
SOH Project Manager (name/code):	**Will Shipp 84-41000**	Contact Information: (phone/e-mail):	**303-445-2799/wshipp@usbr.gov**

1. Action Description:

Review and provide recommendations to complete or improve baseline and annual management reviews that meet objectives outlined in ANSI Z10 Section 7.0 (2012 version)

2. Objectives and Scope:

This action is to develop an implementation plan to complete baseline safety program assessments at all facilities, which are designated duty-station for Reclamation employees. The following steps are proposed:

1. Sample facility-level safety program assessment practices within Reclamation;
2. Assess how those practices integrate into facility safety management systems and their effectiveness in promoting a culture of continual safety improvement;
3. Identify opportunities to improve facility-level program assessment practices and clarify associated goals and objectives;
4. Identify gaps in Reclamation safety policy regarding facility-level program assessments and develop recommend measures to strengthen policies; and
5. Outline an implementation strategy to initiate baseline and annual assessment to meet management review objectives of ANSI Z10.

3. Schedule:

Milestone (product/report/task/etc.):	Start Date	End Date
1. Establish SOH Action Team	July 7, 2014	July 30, 2014
2. Survey existing Reclamation policy and procedures	August 25, 2014	September 30, 2014
3. Sample existing facility program assessment practices	August 25, 2014	September 30, 2014
4. Report of Findings: Policy and Practices - Facility Safety Program Assessments	September 1, 2014	October 30, 2014
5. Develop implementation plan for baseline facility-level program assessments	November 1, 2014	March 28, 2015

4. Financial Plan:

FY 2014		**Labor ($)**	**Expenses ($)**	**Milestone Total ($)**
#	***Milestone***			
1	Establish SOH Action Team	$900.0		
2	Policy Analysis	$6,750.0		
3	Review assessment practices	$8,500.0		
	FY2014 Subtotals	**$16,150**	**$0**	**$0**
FY 2015				
#	***Milestone***			
2	Policy Analysis (Continued)	$20,250.0		
3	Review assessment practices (Continued)	$25,500.0		
4	Report of Findings	$19,200.0		
5	Implementation Plan	$33,300.0	$10,500	
	FY2015 Subtotals	**$98,250**	**$10,500**	**$0**
FY 2016				
#	***Milestone***			

FY2016 Subtotals	**$0**	**$0**	**$0**
Fiscal Year(s) Cost Totals:	***$114,400***	***$10,500***	***$0***

Total PMP Budget: $0

5. Roles and Responsibilities (Optional):

Name	**Responsibility**
Team Leader:	
Dan Mitchell	
Team Member:	
Rebecca Fulkerson	Milestone Lead - Policy Gap Analysis
Russle Anderson	Milestone Lead - Review of current assessment practices
Jeffery Smith	
Brian Wagner	

6. Signatures:

Team Lead:	Date	Executive Sponsor:	Date
Designated Agency Safety and Health Official:	Date	SOH Project Manager Receipt:	Date

7. Additional Information, Notes, Comments, Attachments:

WHITE PAPER ON FACITY BASELINE ASSESSMENT TEAM

DATE: August 15, 2014
FROM: Dan Mitchell, Safety and Occupational Health (SOH) Action Plan # 15 Team Lead and John Baals, Reclamation Executive Sponsor
Team Members:
Becky Fulkerson, Policy Analyst
Sidney Ottem, Yakima Field Office Manager
Brian Wagner, Division Chief, Four Corners Construction Division
Russell Anderson, Reliability Program Analyst, Power Resource Office
Jeff Smith, Environmental Protection Specialist, Lower Colorado Regional Office

SUBJECT: Area-Wide Baseline Facility Safety Evaluations

BACKGROUND

The Department of the Interior's Office of Occupational Safety and Health reviewed Reclamation's SOH Program in July 2013. A weakness identified in its subsequent report notes that Reclamation has, "… not established accountability systems to ensure effective implementation of the SOH program at the working level ….With the adoption of SAF P01, Reclamation has the opportunity to launch concerted action around this policy and ANSI Z10 *(The American National Standard for Occupational Health and Safety Management Systems)* principles that include business practices and management systems to establish a much improved safety culture over time ….The SOH Evaluation Team encourages Reclamation Leadership to build off its strengths and policy initiative to take the safety program to the next level and establish a sound safety culture throughout all levels of the organization."

ANSI Z10 indicates the first step in establishing safety management systems is to complete an initial review (in many organizations this is a baseline or gap analysis) of existing processes. To be effective, an assessment would be completed at each facility within Reclamation. The results from these assessments could help structure Reclamation's planning processes to prioritize and focus resources on establishing effective safety management systems. The baseline program reviews would include:

A) Relevant business management systems;
B) Hazard identification, risk assessment, and control processes;
C) Resources;
D) Applicable regulations, standards, and other health and safety requirements;
E) Assessments; and
F) Other relevant activities. [1]

OBJECTIVES

[1] ANSI Z10 4.1.1 Initial Review

The purpose of this action is to develop an implementation plan to complete baseline safety program assessments at all facilities, which are designated duty-station for Reclamation employees. The following steps are proposed:

A) Sample facility-level safety program assessment practices within Reclamation;
B) Assess how those practices integrate into facility safety management systems and their effectiveness in promoting a culture of continual safety improvement;
C) Identify opportunities to improve facility-level program assessment practices and clarify associated goals and objectives;
D) Identify gaps in Reclamation safety policy regarding facility-level program assessments and develop recommend measures to strengthen policies; and
E) Outline an implementation strategy to initiate baseline and annual program assessments of Reclamation facilities

OVERLAP WITH OTHER ACTIONS

This facility baseline assessment action, as a sub-element of the "plan-do-check-act" management process, overlaps with most other action teams. This occurs because assessment elements cover program elements being evaluated by the other teams; however, this would direct component of Team 2 - *Implementation of SAF-P01*, which requires utilization of a management system processes outlined in ANSI Z10. This safety standard requires completion of baseline assessments.

DELIVERABLES

The team will provide the following:

1. An overview of facility-level safety program assessment processes used currently within Reclamation to include analysis of related policy and its alignment with ANSI Z10. If policy gaps are identified, suggest practical measures to address them.
2. Provide an implementation strategy, including goals and objectives, leading to the completion of meaningful facility-level safety program baselines (and annual) assessments.

MILESTONES

1. Establish team - July 21, 2014
2. Complete survey and report of existing assessment practices and review of roles and responsibilities regarding facility assessments October 30, 2014
3. Submit analysis report - December 31, 2014
4. Draft implementation plan for baseline (and annual) facility-level program assessments - March 28, 2015

WHITE PAPER - MANAGEMENT REVIEW

DATE: December 17, 2014
FROM: Dan Mitchell, Safety and Occupational Health (SOH) Action Plan # 15 Team Lead and John Baals, Reclamation Executive Sponsor
Team Members:
Becky Fulkerson, Policy Analyst
Brian Wagner, Division Chief, Four Corners Construction Division
Russell Anderson, Reliability Program Analyst, Power Resource Office
Jeff Smith, Environmental Protection Specialist, Lower Colorado Regional Office

SUBJECT: Management Review

BACKGROUND

The Department of the Interior's Office of Occupational Safety and Health reviewed Reclamation's SOH Program in July 2013. A weakness identified in its subsequent report notes that Reclamation has, "… not established accountability systems to ensure effective implementation of the SOH program at the working level ….With the adoption of SAF P01, Reclamation has the opportunity to launch concerted action around this policy and ANSI Z10 *(The American National Standard for Occupational Health and Safety Management Systems)* principles that include business practices and management systems to establish a much improved safety culture over time ….The SOH Evaluation Team encourages Reclamation Leadership to build off its strengths and policy initiative to take the safety program to the next level and establish a sound safety culture throughout all levels of the organization."

In addition DOI also stated in their assessment, "Reclamation senior leadership is committed to establishing a strong safety and health program and many of the resources and basic elements/systems for a strong program are in place. However, a positive safety culture is yet to be established within line management and worker ranks. Accountability, responsibility, and ownership are not yet embedded within the Reclamation workforce to demonstrate and achieve Reclamation's stated goal to develop and implement safety and occupational health as a core value."

In response to the DOI draft findings, Reclamation initiated corrective action by forming a Rapid Improvement Team which led to the formation of twenty-one Safety and Occupational Health Action Teams (SOH Action Teams). Each team assignment corresponds to many of the subsystems within Reclamation's safety SOH programs and also ANSI Z10. Action Team 15 was assigned to review process related to Area Wide Baseline Evaluations and provide recommendations for improvement.

Objectives of area-wide baseline evaluations are: 1) Review adoption of the DOI Evaluation Tool for internal review purposes; 2) Complete baseline Evaluations in 2014 for future

comparison; 3) Discuss intervals and long-term commitments to continued monitoring and evaluation progress.

As Reclamation is committed to the implementation of ANSI Z10, a review of the stated objectives, in relation to the standard was completed. In ANSI Z10's management system three types of assessments are included "Initial and Ongoing Reviews[1]", "Audits[2]", and "Management Review[3]" occurring during Plan, Check and Act phases of the safety management system respectively. Each of these activities, although related, is completed at different times and each with different objectives.

As the language of Z10 differs from the Documentation of Action for Team 15 it was necessary to clarify the scope of the team's efforts so that they align with ANSI Z10. Using a common language, based on ANSI Z10 may help the team to communicate objectives and expectations effectively and avoid misunderstanding not only within the team but also with other teams. Therefore, a summary of the different review processes outline in ANSI Z10 follows.

"Initial and Ongoing Reviews" within the Standard are completed by the organization to identify and prioritize management system issues (defined as hazards, risks, management system deficiencies, and opportunities for improvement) and to establish objectives that offer the greatest opportunities for improvement and risk reduction that is consistent with the organization's policy. This assessment is critical in the development of safety action plans and should be an ongoing recurring process that is dynamically linked to other management system activities as each provides feedback to the planning process for continual improvement. The organization's initial review could be considered to be a baseline evaluation.

Within the Evaluation and Corrective Action element of the Standard, "Audits" are completed by the organization to determine whether management systems are appropriately applied and effectively implemented to identify hazards and control risks. For the purposes of the standard, these audits are "system" oriented rather than "compliance" oriented. These audits look to assess if the management procedures are working as planned and if not, seeks to determine why so that improvements can be made. They are completed following the completion of a planned action. These appear to correspond to what is often referred to as an after-action review.

"Management Review", which occurs in the Act phase, are processes used by top management to assess the overall program, at least annually, and identify opportunities for improvement and ensure the system's continued suitability, adequacy, and effectiveness. Input into this review process would include, among other information: progress in risk reduction, effectiveness in addressing underlying causes of risks and system deficiencies, input from employees, status of corrective and preventive actions and changing circumstances; follow-up action from audits and previous management reviews; the extent to which objectives have been met; and the performance of the system relative to expectations. The initial management review could also be considered to be a baseline assessment.

[1] Z10-2012 4.1
[2] Z10-2012 6.3
[3] Z10-2012 7.0

Of these three activities, two ("Initial and Ongoing" and "Audits") are integral to the Plan-Do-Check-Act process. It is apparent that to be effective they would need to be routinely completed at a frequency to enable "continuous" improvement; and therefore, should be developed, and implemented at the facility (organization) level.

In contrast, "Management Review" appears to not be as integral to the operation of the safety management system as Initial and Ongoing Reviews and Audits. The standard stipulates the Management Review process is completed at least annually. In addition, it is apparent there are "upward" reporting requirements needed to address so that "top management" can use the information for strategic planning purposes. Therefore, Team 15 proposes clarifying the scope of the team's efforts to assessing current management review processes and its relationship to Reclamation's strategic safety planning processes.

Currently, Reclamation SOH Office has implemented two assessment processes that could meet the Management Review objectives of the Z10 standard by providing needed input into Reclamations strategic planning processes, a Safety Management Evaluation (SME) and Focused Audit.

OBJECTIVES

The purpose of this action is to develop a plan to establish management review processes that would meet ANSI Z10. The following steps are proposed:

A) Review Reclamation's existing Safety Management Evaluation (SME) and Focused Audit processes and assess their effectiveness.
B) Assess how the management review process integrates information from facility-level safety management systems into Reclamation's strategic safety planning processes;
C) Identify gaps in Reclamation safety policy and procedures regarding management review processes and develop recommend measures to strengthen policies.

OVERLAP WITH OTHER ACTIONS

This action, as a sub-element of the "plan-do-check-act" management process, overlaps with many of other action team's efforts; however, as Management Review is component of ANSI, coordination with Team 2 - *Implementation of SAF-P01* is necessary.

DELIVERABLES

The team will provide the following:

1. Am assessment of management review processes within Reclamation
2. Provide feedback to improve management review processes and its use for strategic planning purposes.

MILESTONES

1. Establish team - July 21, 2014

2. Complete survey and report of existing assessment practices and review of roles and responsibilities regarding facility assessments October 30, 2014 [COMPLETED]
3. Submit analysis report - December 31, 2014 [COMPLETED]
4. Observe completion of an SME and Focused Program Audit.
5. Review historical SME and Focused Audits and their use in strategic planning.
6. Draft position paper to include an assessment of current SME and Focused Reviews and their use in strategic planning.

Appendix B – Policies Reviewed

Subpart C—Standards

1960.16 Compliance with OSHA standards.
1960.17 Alternate standards.
1960.18 Supplementary standards.
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Subpart D—Inspection and Abatement

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1960.26 Conduct of inspections.
1960.27 Representatives of officials in charge and representatives of employees.
1960.28 Employee reports of unsafe or unhealthful working conditions.
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1960.34 General provisions.
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Subpart F—Occupational Safety and Health Committees

1960.36 General provisions.
1960.37 Committee organization.
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1960.39 Agency responsibilities.
1960.40 Establishment committee duties.
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Subpart G—Allegations of Reprisal

1960.46 Agency responsibility.
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Subpart H—Training

1960.54 Training of top management officials.
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1960.59 Training of employees and employee representatives.
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Subpart I—Recordkeeping and Reporting Requirements

1960.66 Purpose, scope, and general provisions.
1960.67 Federal agency certification of the injury and illness annual summary (OSHA 300–A or equivalent).
1960.68 Prohibition against discrimination.
1960.69 Retention and updating of old forms.
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1960.72–1960.74 [Reserved]

Subpart J—Evaulation of Federal Occupational Safety and Health Programs

1960.78 Purpose and scope.
1960.79 Self-evaluations of occupational safety and health programs.
1960.80 Secretary's evaluations of agency occupational safety and health programs.

Subpart K—Field Federal Safety and Health Councils

1960.84 Purpose.
1960.85 Role of the Secretary.
1960.86 Establishing councils.
1960.87 Objectives.
1960.88 Membership and participation.
1960.89 Organization.
1960.90 Operating procedures.

AUTHORITY: Sections 19 and 24 of the Occupational Safety and Health Act of 1970 (84 Stat. 1609, 1614; 29 U.S.C. 668, 673), 5 U.S.C. 553, Secretary of Labor's Order No. 1–90 (55 FR 9033), and Executive Order 12196.

SOURCE: 45 FR 69798, Oct. 21, 1980, unless otherwise noted.

Subpart A—General

§ 1960.1 Purpose and scope.

(a) Section 19 of the Occupational Safety and Health Act (the Act) contains special provisions to assure safe and healthful working conditions for Federal employees. Under that section, it is the responsibility of the head of each Federal agency to establish and maintain an effective and comprehensive occupational safety and health program which is consistent with the standards promulgated under section 6 of the Act. The Secretary of Labor (the Secretary), under section 19, is to report to the President certain evaluations and recommendations with respect to the programs of the various agencies, and the duties which section 24 of the Act imposes on the Secretary of Labor necessarily extend to the collection, compilation and analysis of occupational safety and health statistics from the Federal Government. The role of the General Services Administration in this area stems from its duties as the Government's principal landlord and from its specific safety and health

responsibilities under 41 CFR part 101, subchapter D, Federal Property Management Regulations.

(b) Executive Order 12196, Occupational Safety and Health Programs for Federal Employees, issued February 26, 1980, prescribes additional responsibilities for the heads of agencies, the Secretary, and the General Services Administrator. Among other duties, the Secretary is required to issue basic program elements in accordance with which the heads of agencies shall operate their safety and health programs. The purpose of this part is to issue these basic program elements. Although agency heads are required to operate a program in accordance with the basic program elements, those elements contain numerous provisions which, by their terms, permit agency heads the flexibility necessary to implement their programs in a manner consistent with their respective missions, sizes, and organizations. Moreover, an agency head, after consultation with agency employees or their representatives and with appropriate safety and health committees may request the Secretary to consider approval of alternate program elements; the Secretary, after consultation with the Federal Advisory Council on Occupational Safety and Health, may approve such alternate program elements.

(c) Under Executive Order 12196, the Secretary is required to perform various services for the agencies, including consultation, training, recordkeeping, inspections, and evaluations. Agencies are encouraged to seek such assistance from the Secretary as well as advice on how to comply with the basic program elements and operate effective occupational safety and health programs. Upon the request of an Agency, the Office of Federal Agency Safety and Health Programs will review proposed agency plans for the implementation of program elements.

(d) Section 19 of the Act and the Executive Order require specific opportunities for employee participation in the operation of agency safety and health programs. The manner of fulfilling these requirements is set forth in part in these program elements. These requirements are separate from but consistent with the Federal Service Labor Management Relations Statute (5 U.S.C. 71) and regulations dealing with labor-management relations within the Federal Government.

(e) Executive Order 12196 and these basic program elements apply to all agencies of the Executive Branch. They apply to all Federal employees. They apply to all working conditions of Federal employees except those involving uniquely military equipment, systems, and operations.

(f) No provision of the Executive Order or this part shall be construed in any manner to relieve any private employer, including Federal contractors, or their employees of any rights or responsibilities under the provisions of the Act, including compliance activities conducted by the Department of Labor or other appropriate authority.

(g) Federal employees who work in establishments of private employers are covered by their agencies' occupational safety and health programs. Although an agency may not have the authority to require abatement of hazardous conditions in a private sector workplace, the agency head must assure safe and healthful working conditions for his/her employees. This shall be accomplished by administrative controls, personal protective equipment, or withdrawal of Federal employees from the private sector facility to the extent necessary to assure that the employees are protected.

[45 FR 69798, Oct. 21, 1980, as amended at 60 FR 34852, July 5, 1995]

§ 1960.2 Definitions.

(a) The term *Act* means the Occupational Safety and Health Act of 1970 (84 Stat. 1590 *et seq.*, 29 U.S.C. 651 *et seq.*).

(b) The term *agency* for the purposes of this part means an Executive Department, as defined in 5 U.S.C. 101, or any employing unit or authority of the Executive Branch of the Government. For the purposes of this part to the extent it implements section 19 of the Act, the term *agency* includes the United States Postal Service. By agreement between the Secretary of Labor and the head of an agency of the Legislative or Judicial Branches of the Government, these regulations may be applicable to such agencies.

(c) The term *agency liaison* means an agency person appointed with full authority and reponsibility to represent the occupant agency management with the official in charge of a facility or installation such as a GSA Building Manager.

(d) The term *building manager* means the person who manages one or several buildings under the authority of a Federal agency. For example, a building manager may be the GSA person who manages building(s) for GSA.

(e) As used in Executive Order 12196, the term *consultation with representatives of the employees thereof* shall include such consultation, conference, or negotiation with representatives of agency employees as is consistent with the Federal Service Labor Management Relations Statute (5 U.S.C. 71), or collective bargaining or other labor-management arrangements. As used in this part, the term *representative of employees* shall be interpreted with due regard for any obligation imposed by the aforementioned statute and any other labor-management arrangement that may cover the employees involved.

(f) The term *Designated Agency Safety and Health Official* means the individual who is responsible for the management of the safety and health program within an agency, and is so designated or appointed by the head of the agency pursuant to § 1960.6 and the provisions of Executive Order 12196.

(g) The term *employee* as used in this part means any person, other than members of the Armed Forces, employed or otherwise suffered, permitted, or required to work by an *agency* as the latter term is defined in paragraph (b) of this section.

(h) The term *establishment* means a single physical location where business is conducted or where services or operations are performed. Where distinctly separate activities are performed at a single physical location, each activity shall be treated as a separate *establishment*. Typically, an *establishment* as used in this part refers to a field activity, regional office, area office, installation, or facility.

(i) The term *uniquely military equipment, systems, and operations* excludes from the scope of the order the design of Department of Defense equipment and systems that are unique to the national defense mission, such as military aircraft, ships, submarines, missiles, and missile sites, early warning systems, military space systems, artillery, tanks, and tactical vehicles; and excludes operations that are uniquely military such as field maneuvers, naval operations, military flight operations, associated research test and development activities, and actions required under emergency conditions. The term includes within the scope of the Order Department of Defense workplaces and operations comparable to those of industry in the private sector such as: Vessel, aircraft, and vehicle repair, overhaul, and modification (except for equipment trials); construction; supply services; civil engineering or public works; medical services; and office work.

(j) The term *incidence rates* means the number of injuries and illnesses, or lost workdays, per 100 full-time workers. Rates are calculated as

$$N \times 200{,}000 \div EH$$

N = number of injuries and illnesses, or number of lost workdays.
EH = total hours worked by all employees during a month, a quarter, or fiscal year.
200,000 = base for 100 full-time equivalent workers (working 40 hours per week, 50 weeks per year).

(k) The term *inspection* means a comprehensive survey of all or part of a workplace in order to detect safety and health hazards. Inspections are normally performed during the regular work hours of the agency, except as special circumstances may require. Inspections do not include routine, day-to-day visits by agency occupational safety and health personnel, or routine workplace surveillance of occupational health conditions.

(l) *Injury or illness*. An injury or illness is an abnormal condition or disorder. Injuries include cases such as, but not limited to, a cut, fracture, sprain, or amputation. Illness includes both acute and chronic illnesses, such as, but not limited to, a skin disease, respiratory disorder, or poisoning.

(m) The term *representative of management* means a supervisor or management official as defined in the applicable labor-management relations program covering the affected employees.

(n)–(p) [Reserved]

(q) The term *Safety and Health Inspector* means a safety and/or occupational health specialist or other person authorized pursuant to Executive Order 12196, section 1–201(g), to carry out inspections for the purpose of subpart D of this part, a person having equipment and competence to recognize safety and/or health hazards in the workplace.

(r) The term *Safety and Health Official* means an individual who manages the occupational safety and/or occupational health program at organizational levels below the Designated Agency Safety and Health Official.

(s) The term *Safety and Health Specialist* means a person or persons meeting the Office of Personnel Management standards for such occupations, which include but are not limited to:

Safety and Occupational Health Manager/Specialist GS–018
Safety Engineer GS–803
Fire Prevention Engineer GS–804
Industrial Hygienist GS–690
Fire Protection and Prevention Specialist/Marshal GS–081
Health Physicist GS–1306
Occupational Medicine Physician GS–602
Occupational Health Nurse GS–610
Safety Technician GS–019
Physical Science Technician GS–1311
Environmental Health Technician GS–699
Air Safety Investigation Officer GS–1815
Aviation Safety Specialist GS–1825
Chemist GS–1320
Health Technician GS–645
Highway Safety Manager GS–2125

or equally qualified military, agency, or nongovernment personnel. The agency head shall be responsible for determination and certification of equally qualified personnel.

(t) The term *workplace* means a physical location where the agency's work or operations are performed.

(u) The term *imminent danger* means any conditions or practices in any workplace which are such that a danger exists which could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through normal procedures.

(v) The word *serious* as used in *serious hazard, serious violation* or *serious condition* means a hazard, violation or condition such that there is a substantial probability that death or serious physical harm could result.

(w) The term *certified safety and health committee* means an agency safety and health committee that meets the provisions of section 1–3 of Executive Order 12196 and of this part, as listed and attested to by the head of each agency in writing to the Secretary.

(x) The term *reprisal* as used in this part means any act of restraint, interference, coercion or discrimination against an employee for exercising his or her rights under Executive Order 12196 and this part, or for participating in the agency's safety and health program.

[45 FR 69798, Oct. 21, 1980, as amended at 49 FR 3078, Jan. 25, 1984; 50 FR 40269, Oct. 2, 1985; 51 FR 28378, Aug. 7, 1986; 69 FR 68804, Nov. 26, 2004]

Subpart B—Administration

§ 1960.6 Designation of agency safety and health officials.

(a) The head of each agency shall designate an official with sufficient authority and responsibility to represent effectively the interest and support of the agency head in the management and administration of the agency occupational safety and health program. This Designated Agency Safety and Health Official should be of the rank of Assistant Secretary, or of equivalent rank, or equivalent degree of responsibility, and shall have sufficient headquarters staff with the necessary training and experience. The headquarters staff should report directly to, or have appropriate access to, the Designated Agency Safety and Health Official, in order to carry out the responsibilities under this part.

(b) The Designated Agency Safety and Health Official shall assist the agency head in establishing:

(1) An agency occupational safety and health policy and program to carry out the provisions of section 19 of the Act, Executive Order 12196, and this part;

(2) An organization, including provision for the designation of safety and health officials at appropriate levels, with adequate budgets and staffs to implement the occupational safety and

health program at all operational levels;

(3) A set of procedures that ensures effective implementation of the agency policy and program as required by section 19 of the Act, Executive Order 12196, and the program elements of this part, considering the mission, size, and organization of the agency;

(4) Goals and objectives for reducing and eliminating occupational accidents, injuries, and illnesses;

(5) Plans and procedures for evaluating the agency's occupational safety and health program effectiveness at all operational levels; and

(6) Priorities with respect to the factors which cause occupational accidents, injuries, and illnesses in the agency's workplaces so that appropriate corrective actions can be taken.

(c) The agency head shall assure that safety and health officials are designated at each appropriate level with sufficient authority and responsibility to plan for and assure funds for necessary safety and health staff, equipment, materials, and training required to ensure implementation of an effective occupational safety and health program.

§ 1960.7 Financial management.

(a) The head of each agency shall ensure that the agency budget submission includes appropriate financial and other resources to effectively implement and administer the agency's occupational safety and health program.

(b) The Designated Agency Safety and Health Official, management officials in charge of each establishment, safety and health officials at all appropriate levels, and other management officials shall be responsible for planning, requesting resources, implementing, and evaluating the occupational safety and health program budget in accordance with the regulations of the Office of Management and Budget Circular A–11 (sections 13.2(f) and 13.5(f)) and other relevant documents.

(c) Appropriate resources for an agency's occupational safety and health program shall include, but not be limited to:

(1) Sufficient personnel to implement and administer the program at all levels, including necessary administrative costs such as training, travel, and personal protective equipment;

(2) Abatement of unsafe or unhealthful working conditions related to agency operations or facilities;

(3) Safety and health sampling, testing, and diagnostic and analytical tools and equipment, including laboratory analyses;

(4) Any necessary contracts to identify, analyze, or evaluate unsafe or unhealthful working conditions and operations;

(5) Program promotional costs such as publications, posters, or films;

(6) Technical information, documents, books, standards, codes, periodicals, and publications; and

(7) Medical surveillance programs for employees.

§ 1960.8 Agency responsibilities.

(a) The head of each agency shall furnish to each employee employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm.

(b) The head of each agency shall comply with the Occupational Safety and Health Administration standards applicable to the agency.

(c) The head of each agency shall develop, implement, and evaluate an occupational safety and health program in accordance with the requirements of section 19 of the Act, Executive Order 12196, and the basic program elements prescribed in this part, or approved alternate program elements.

(d) The head of each agency shall acquire, maintain, and require the use of approved personal protective equipment, approved safety equipment, and other devices necessary to protect employees.

(e) In order to provide essential specialized expertise, agency heads shall authorize safety and health personnel to utilize such expertise from whatever source available, including but not limited to other agencies, professional groups, consultants, universities, labor organizations, and safety and health committees.

§ 1960.9 Supervisory responsibilities.

Employees who exercise supervisory functions shall, to the extent of their

authority, furnish employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm. They shall also comply with the occupational safety and health standards applicable to their agency and with all rules, regulations, and orders issued by the head of the agency with respect to the agency occupational safety and health program.

§ 1960.10 Employee responsibilities and rights.

(a) Each employee shall comply with the standards, rules, regulations, and orders issued by his/her agency in accordance with section 19 of the Act, Executive Order 12196, and this part which are applicable to his/her own actions and conduct.

(b) Employees shall use safety equipment, personal protective equipment, and other devices and procedures provided or directed by the agency and necessary for their protection.

(c) Employees shall have the right to report unsafe and unhealthful working conditions to appropriate officials.

(d) Employees shall be authorized official time to participate in the activities provided for in section 19 of the Act, Executive Order 12196, this part, and the agency occupational safety and health program.

§ 1960.11 Evaluation of occupational safety and health performance.

Each agency head shall ensure that any performance evaluation of any management official in charge of an establishment, any supervisory employee, or other appropriate management official, measures that employee's performance in meeting requirements of the agency occupational safety and health program, consistent with the employee's assigned responsibilities and authority, and taking into consideration any applicable regulations of the Office of Personnel Management or other appropriate authority. The recognition of superior performance in discharging safety and health responsibilities by an individual or group should be encouraged and noted.

§ 1960.12 Dissemination of occupational safety and health program information.

(a) Copies of the Act, Executive Order 12196, program elements published in this part, details of the agency's occupational safety and health program, and applicable safety and health standards shall be made available upon request to employees or employee representatives for review.

(b) A copy of the agency's written occupational safety and health program applicable to the establishment shall be made available to each supervisor, each occupational safety and health committee member, and to employee representatives.

(c) Each agency shall post conspicuously in each establishment, and keep posted, a poster informing employees of the provisions of the Act, Executive Order 12196, and the agency occupational safety and health program under this part. The Department of Labor will furnish the core text of a poster to agencies. Each agency shall add the following items:

(1) Details of the agency's procedures for responding to reports by employees of unsafe or unhealthful working conditions, and to allegations of discrimination or reprisal due to participation in safety and/or health activities;

(2) The location where employees may obtain information about the agency's occupational safety and health program, including the full text of agency occupational safety and health standards, and

(3) Relevant information about any agency safety and health committees.

Such posters and additions shall not be altered, defaced, or covered by other material.

(d) A copy of the agency's poster shall be provided to the Secretary. If the agency needs assistance and advice on the content and development of the poster, such shall be requested of the Secretary prior to printing and distribution.

(e) Agency heads shall promote employee awareness of occupational safety and health matters through their ordinary information channels, such as newsletters, bulletins and handbooks.

Subpart C—Standards

§ 1960.16 Compliance with OSHA standards.

Each agency head shall comply with all occupational safety and health standards issued under section 6 of the Act, or with alternate standards issued pursuant to this subpart. In complying with section 6 standards, an agency may, upon prior notification to the Secretary, prescribe and enforce more stringent permissible exposure levels or threshhold limit values and may require more frequent monitoring of exposures without recourse to the approval procedures for alternate standards described in § 1960.17. In addition, after consultation with employees and safety and health committees and prior notification to the Secretary, an agency may utilize the latest edition of a reference standard if it is more stringent than the section 6 standard. After notification, the Secretary may require the use of the approval procedures for alternate standards for any of the situations described in this paragraph.

§ 1960.17 Alternate standards.

An agency head may apply an alternate standard where deemed necessary, and shall, after consultation with employees or their representatives, including appropriate occupational safety and health committees, notify the Secretary and request approval of such alternate standards.

(a) Any request by the head of the agency for an alternate standard shall be transmitted to the Secretary.

(b) Any such request for an alternate standard shall not be approved by the Secretary unless it provides equivalent or greater protection for affected employees. Any such request shall include:

(1) A statement of why the agency cannot comply with the OSHA standard or wants to adopt an alternate standard;

(2) A description of the alternate standard;

(3) An explanation of how the alternate standard provides equivalent or greater protection for the affected employees;

(4) A description of interim protective measures afforded employees until a decision is rendered by the Secretary of Labor; and

(5) A summary of written comments, if any, from interested employees, employee representatives, and occupational safety and health committees.

§ 1960.18 Supplementary standards.

(a) In addition to complying with emergency temporary standards issued under section 6 of the Act, an agency head shall adopt such emergency temporary and permanent supplementary standards as necessary and appropriate for application to working conditions of agency employees for which there exists no appropriate OSHA standards. In order to avoid any possible duplication of effort, the agency head should notify the Secretary of the subject matter of such standard when the development of the standard begins.

(b) The agency head shall send a copy of the final draft of the permanent supplementary standard to the Secretary prior to official adoption by the agency, along with any written comments on the standard from interested employees, employee representatives, and occupational safety and health committees. If the Secretary finds the permanent supplementary standard to be adopted inconsistent with OSHA standards, or inconsistent with OSHA enforcement practices under section 5(a)(1) of the Act, the Secretary shall have 15 working days in which to notify the head of the agency of this finding. In such a case, the supplementary standard shall not be adopted, but the agency will be afforded an opportunity to resubmit a revised standard that is designed to provide adequate protection and is consistent with OSHA standards. Upon request of the agency head, the Secretary shall offer to the agency technical assistance in the development of the supplemental standard.

§ 1960.19 Other Federal agency standards affecting occupational safety and health.

(a) Where employees of different agencies engage in joint operations, and/or primarily report to work or carry out operations in the same establishment, the standards adopted under

§ 1960.17 or § 1960.18 of the host agency shall govern.

(b) There are situations in which the head of an agency is required to comply with standards affecting occupational safety and health issued by a Federal agency other than OSHA. For example, standards issued by the Federal Aviation Administration, the Department of Energy, or the General Services Administration may be applicable to certain Federal workplaces. Nothing in this subpart affects the duty of any agency head to comply with such standards. In addition, agency heads should comply with other standards issued by Federal agencies which deal with hazardous working conditions, but for which OSHA has no standards.

(c) Although it is not anticipated that standards of other Federal agencies will conflict with OSHA standards, should such conflict occur, the head of the agency shall inform the other Federal agency and the Secretary so that joint efforts to resolve the issues may be undertaken. However, until conflicts are resolved, agencies shall comply with the more protective of the conflicting standards.

Subpart D—Inspection and Abatement

§ 1960.25 Qualifications of safety and health inspectors and agency inspections.

(a) Executive Order 12196 requires that each agency utilize as inspectors ''personnel with equipment and competence to recognize hazards.'' Inspections shall be conducted by inspectors qualified to recognize and evaluate hazards of the working environment and to suggest general abatement procedures. Safety and health specialists as defined in § 1960.2(s), with experience and/or up-to-date training in occupational safety and health hazard recognition and evaluation are considered as meeting the qualifications of safety and health inspectors. For those working environments where there are less complex hazards, such safety and health specializations as cited above may not be required, but inspectors in such environments shall have sufficient documented training and/or experience in the safety and health hazards of the workplace involved to recognize and evaluate those particular hazards and to suggest general abatement procedures. All inspection personnel must be provided the equipment necessary to conduct a thorough inspection of the workplace involved.

(b) Each agency which has workplaces containing information classified in the interest of national security shall provide access to safety and health inspectors who have obtained the appropriate security clearance.

(c) All areas and operations of each workplace, including office operations, shall be inspected at least annually. More frequent inspections shall be conducted in all workplaces where there is an increased risk of accident, injury, or illness due to the nature of the work performed. Sufficient unannounced inspections and unannounced follow-up inspections should be conducted by the agency to ensure the identification and abatement of hazardous conditions.

(d) When situations arise involving multiple agencies' responsibilities for conditions affecting employee safety and health, coordination of inspection functions is encouraged.

§ 1960.26 Conduct of inspections.

(a) *Preparation.* (1) Prior to commencement of the inspection, the Safety and Health Inspector shall be provided all available relevant information which pertains to the occupational safety and health of the workplace to be inspected, including safety and health hazard reports, injury and illness records, previous inspection reports, and reports of unsafe and unhealthful working conditions.

(2) The Safety and Health Inspector shall determine in advance, where possible, the actual work procedures and conditions to be inspected, in order to have the proper equipment available to conduct an effective inspection.

(b) *Inspection.* (1) For the purpose of assuring safe and healthful working conditions for employees of agencies, the head of the agency shall authorize safety and/or health inspectors: To enter without delay, and at reasonable times, any building, installation, facility, construction site, or other area, workplace, or environment where work

is performed by employees of the agency; to inspect and investigate during regular working hours and at other reasonable times, and within reasonable limits and in a reasonable manner, any such place of employment and all pertinent conditions, structures, machines, apparatus, devices, equipment, and materials therein, and to question privately any agency employee, and/or any agency supervisory employee, and/or any official in charge of an establishment.

(2) If there are no authorized representatives of employees, the inspector shall consult with a reasonable number of employees during the walkaround.

(3) When, in the opinion of the inspector, it is necessary to conduct personal monitoring (sampling) of employee's work environments, the inspector may request employees to wear reasonable and necessary personal monitoring devices, e.g., noise dosimeters and air sampling pumps, for periods determined by the inspector to be necessary for complete and effective sampling of the environment.

(4) Upon request of the inspector, the employer shall encourage employees to wear the personal environmental monitoring devices during an inspection.

(5) Whenever and as soon as it is concluded on the basis of an inspection that a danger exists which could reasonably be expected to cause death or serious physical harm immediately, the inspector shall inform the affected employees and official in charge of the workplace of the danger. The official in charge of the workplace, or a person empowered to act for that official, shall undertake immediate abatement and the withdrawal of employees who are not necessary for abatement of the dangerous conditions. In the event the official in charge of the workplace needs assistance to undertake full abatement, that official shall promptly contact the Designated Agency Safety and Health Official and other responsible agency officials, who shall assist the abatement effort. Safety and health committees shall be informed of all relevant actions and representatives of the employees shall be so informed.

(6) At the conclusion of an inspection, the Safety and Health Inspector shall confer with the official in charge of the workplace or that official's representative, and with an appropriate representative of the employees of the establishment, and informally advise them of any apparent unsafe or unhealthful working conditions disclosed by the inspection. During any such conference, the official in charge of the workplace and the employee representative shall be afforded an opportunity to bring to the attention of the Safety and Health Inspector any pertinent information regarding conditions in the workplace.

(c) *Written reports and notices of unsafe or unhealthful working conditions.* (1) The inspector shall, in writing, describe with particularity the procedures followed in the inspection and the findings which form the basis for the issuance of any Notice of Unsafe or Unhealthful Working Conditions.

(2) Each agency shall establish a procedure for the prompt issuance of a Notice of Unsafe or Unhealthful Working Conditions. Such notices shall be issued not later than 15 days after completion of the inspection for safety violations or not later than 30 days for health violations. If there are compelling reasons why such notice cannot be issued within the 15 days or 30 days indicated, the persons described in paragraph (c)(2)(iii) of this section shall be informed of the reasons for the delay. Such procedure shall include the following:

(i) Notices shall be in writing and shall describe with particularity the nature and degree of seriousness of the unsafe or unhealthful working condition, including a reference to the standard or other requirement involved;

(ii) The notice shall fix a reasonable time for the abatement of the unsafe or unhealthful working condition; and

(iii) A copy of the notice shall be sent to the official in charge of the workplace, the employee representative who participated in the closing conference, and/or the safety and health committee of the workplace, if any.

(3) Upon receipt of any notice of an unsafe or unhealthful working condition, the official in charge of a workplace shall immediately post such notice, or copy thereof, unedited, except for reason of national security, at or near each place an unsafe or unhealthful working condition referred to in the notice exists or existed. In addition, a notice shall be posted if any special procedures are in effect. Where, because of the nature of the workplace operations, it is not practicable to post the notice at or near each such place, such notice shall be posted, unedited, except for reason of national security, in a prominent place where it will be readily observable by all affected employees. For example, where workplace activities are physically dispersed, the notice may be posted at the location to which employees report each day. Where employees do not primarily work at or report to a single location, the notice may be posted at the location from which the employees operate to carry out their activities.

(4) Each notice of an unsafe or unhealthful working condition, or a copy thereof, shall remain posted until the unsafe or unhealthful working condition has been abated or for 3 working days whichever is later. A copy of the notice will be filed and maintained for a period of five years after abatement at the establishment and made available to the Secretary upon request.

[45 FR 69798, Oct. 21, 1980; 45 FR 77003, Nov. 21, 1980]

§ 1960.27 Representatives of officials in charge and representatives of employees.

(a) Safety and health inspectors shall be in charge of inspections and may interview any employee in private if the inspector deems it necessary. A representative of the official in charge of a workplace and a representative of employees shall be given an opportunity to accompany Safety and Health Inspectors during the physical inspection of any workplace, both to aid the inspection and to provide such representatives with more detailed knowledge of any existing or potential unsafe or unhealthful working conditions. The representative of employees shall be selected by the employees. Additional representatives of the official in charge and additional representatives of employees may accompany the Safety and Health Inspectors if it is determined by the inspector that such additional representatives will further aid the inspection. Different representatives of the employer and employees may be allowed to accompany the Inspector during each different phase of an inspection.

(b) Safety and health inspectors shall be authorized to deny the right of accompaniment under this section to any person whose participation interferes with a fair and orderly inspection.

(c) With regard to facilities classified in the interest of national security, only persons authorized to have access to such facilities shall be allowed to accompany a Safety and Health Inspector in such areas.

(d) Safety and health inspectors shall consult with employees concerning matters of occupational safety and health to the extent deemed necessary for the conduct of an effective and thorough inspection. During the course of an inspection, any employee shall be afforded an opportunity to bring to the attention of the Safety and Health Inspector any unsafe or unhealthful working condition which the employee has reason to believe exists in the workplace.

§ 1960.28 Employee reports of unsafe or unhealthful working conditions.

(a) The purpose of employee reports is to inform agencies of the existence of, or potential for, unsafe or unhealthful working conditions. A report under this part is not a grievance.

(b) This section provides guidance in establishing a channel of communication between agency employees and those with responsibilities for safety and health matters, e.g., their supervisor, the agency safety and health officials, safety and health committees, safety and health inspectors, the head of the agency, or the Secretary. These channels of communication are intended to assure prompt analysis and response to reports of unsafe or unhealthful working conditions in accordance with the requirements of Executive Order 12196. Since many safety and health problems can be eliminated

as soon as they are identified, the existence of a formal channel of communication shall not preclude immediate corrective action by an employee's supervisor in response to oral reports of unsafe or unhealthful working conditions where such action is possible. Nor should an employee be required to await the outcome of such an oral report before filing a written report pursuant to the provisions of this section.

(c) Any employee or representative of employees, who believes that an unsafe or unhealthful working condition exists in any workplace where such employee is employed, shall have the right and is encouraged to make a report of the unsafe or unhealthful working condition to an appropriate agency safety and health official and request an inspection of such workplace for this purpose. The report shall be reduced to writing either by the individual submitting the report or, in the case of an oral notification, by the above official or other person designated to receive the reports in the workplace. Any such report shall set forth the grounds for the report and shall contain the name of the employee or representative of employees. Upon the request of the individual making such report, no person shall disclose the name of the individual making the report or the names of individual employees referred to in the report, to anyone other than authorized representatives of the Secretary. In the case of imminent danger situations, employees shall make reports by the most expeditious means available.

(d) *Reports received by the agency*. (1) Each report of an existing or potential unsafe or unhealthful working condition should be recorded on a log maintained at the establishment. If an agency finds it inappropriate to maintain a log of written reports at the establishment level, it may avail itself of procedures set forth in § 1960.71. A copy of each report received shall be sent to the appropriate establishment safety and health committee.

(2) A sequentially numbered case file, coded for identification, should be assigned for purposes of maintaining an accurate record of the report and the response thereto. As a minimum, each establishment's log should contain the following information: date, time, code/reference/file number, location of condition, brief description of the condition, classification (imminent danger, serious or other), and date and nature of action taken.

(3) Executive Order 12196 requires that agency inspections be conducted within 24 hours for employee reports of imminent danger conditions, within three working days for potentially serious conditions, and within 20 working days for other than serious safety and health conditions. However, an inspection may not be necessary if, through normal management action and with prompt notification to employees and safety and health committees, the hazardous condition(s) identified can be abated immediately.

(4) An employee submitting a report of unsafe or unhealthful conditions shall be notified in writing within 15 days if the official receiving the report determines there are not reasonable grounds to believe such a hazard exists and does not plan to make an inspection based on such report. A copy of each such notification shall be provided by the agency to the appropriate certified safety and health committee, where established under Executive Order 12196. An agency's inspection or investigation report, if any, shall be made available to the employee making the report within 15 days after completion of the inspection, for safety violations or within 30 days for health violations, unless there are compelling reasons, and shall be made available to the Secretary or the Secretary's authorized representative on request.

(e) *Reports received by the Secretary of Labor*. (1) Agency safety and health programs must have provisions for responding to employees' reports of unsafe or unhealthful working conditions and the Secretary encourages employees to use agency procedures as the most expeditious means of achieving abatement of hazardous conditions. It is recognized, however, that employee reports may be received directly by the Secretary.

(2) When such reports are received directly from an employee or employee representative, the Secretary shall, where a certified safety and health committee exists, forward the report to

the agency for handling in accordance with procedures outlined in § 1960.28(d). A copy of the response to the originator shall be sent to the Secretary.

(3) Where there is no certified safety and health committee, or when requested by half the members of a committee, the Secretary may initiate an inspection or other appropriate action. When the Secretary determines that an inspection is warranted, the Secretary shall observe the same response times as required of the agencies under the Executive Order and § 1960.28(d)(3). When the Secretary determines not to make an inspection, the report shall be forwarded to the agency for handling in accordance with procedures outlined in § 1960.28(d). A copy of the response to the originator shall be sent to the Secretary.

§ 1960.29 Accident investigation.

(a) While all accidents should be investigated, including accidents involving property damage only, the extent of such investigation shall be reflective of the seriousness of the accident.

(b) In any case, each accident which results in a fatality or the hospitalization of three or more employees shall be investigated to determine the causal factors involved. Except to the extent necessary to protect employees and the public, evidence at the scene of an accident shall be left untouched until inspectors have an opportunity to examine it.

(c) Any information or evidence uncovered during accident investigations which would be of benefit in developing a new OSHA standard or in modifying or revoking an existing standard should be promptly transmitted to the Secretary.

(d) The investigative report of the accident shall include appropriate documentation on date, time, location, description of operations, description of accident, photographs, interviews of employees and witnesses, measurements, and other pertinent information. A copy of the investigative report required by this section shall be forwarded to the official in charge of the workplace, the appropriate safety and health committee, and the exclusive employee representative, if any. The investigative report shall be made available to the Secretary or his authorized representative on request.

[45 FR 69798, Oct. 21, 1980, as amended at 69 FR 68804, Nov. 26, 2004]

§ 1960.30 Abatement of unsafe or unhealthful working conditions.

(a) The agency shall ensure the prompt abatement of unsafe and unhealthful conditions. Where a Notice of an Unsafe or Unhealthful Working Condition has been issued, abatement shall be within the time set forth in the notice, or in accordance with the established abatement plan.

(b) The procedures for correcting unsafe or unhealthful working conditions shall include a follow-up, to the extent necessary, to determine whether the correction was made. If, upon the follow-up, it appears that the correction was not made, or was not carried out in accordance with an abatement plan prepared pursuant to paragraph (c) of this section, the official in charge of the establishment and the appropriate safety and health committee shall be notified of the failure to abate.

(c) The official in charge of the establishment shall promptly prepare an abatement plan with the appropriate participation of the establishment's Safety and Health Official or a designee, if in the judgment of the establishment official the abatement of an unsafe or unhealthful working condition will not be possible within 30 calendar days. Such plan shall contain an explanation of the circumstances of the delay in abatement, a proposed timetable for the abatement, and a summary of steps being taken in the interim to protect employees from being injured as a result of the unsafe or unhealthful working condition. A copy of the plan shall be sent to the safety and health committee, and, if no committee exists, to the representative of the employees. Any changes in an abatement plan will require the preparation of a new plan in accordance with the provisions of this section.

(d) When a hazard cannot be abated within the authority and resources of the official in charge of the establishment, that official shall request assistance from appropriate higher authority. The local safety and health official, any established committee and/or

employee representatives, and all personnel subject to the hazard shall be advised of this action and of interim protective measures in effect, and shall be kept informed of subsequent progress on the abatement plan.

(e) When a hazard cannot be abated without assistance of the General Services Administration or other Federal lessor agency, the occupant agency shall act with the lessor agency to secure abatement. Procedures for coordination with the General Services Administration are contained in subpart E of this part.

§ 1960.31 Inspections by OSHA.

(a) The Secretary or the Secretary's representatives are authorized to conduct, when the Secretary deems necessary, announced or unannounced inspections in the following situations:

(1) Where an agency has not established occupational safety and health committees or where committees no longer operate in conformance to the requirements of subpart F of this part;

(2) In response to a request from half the membership of record of any certified safety and health committee; and

(3) In response to an employee's report of an imminent danger situation, where there is a certified committee, but where the Secretary determines that neither the agency nor the committee has responded to the employee.

(b) The Secretary's inspectors or evaluators are authorized: to enter without delay, and at reasonable times, any building, installation, facility, construction site, or other area, workplace, or environment where work is performed by employees of the agency; to inspect and investigate during regular working hours and at other reasonable times, and within reasonable limits and in a reasonable manner, any such place of employment, and all pertinent conditions, structures, machines, apparatus, devices, equipment, and materials therein, and to question privately any employee, any supervisory employee, and/or any official in charge of an establishment.

(c) The Secretary may also make scheduled inspections as an integral part of OSHA's evaluation of an agency's safety and health program in accordance with subpart J of this part.

(d) OSHA inspections shall follow the general format set forth for agency inspections in other applicable parts of this subpart.

Subpart E—General Services Administration and Other Federal Agencies

§ 1960.34 General provisions.

Within six months of the effective date of this part, the Secretary of Labor and the Administrator of the General Services Administration (GSA) shall initiate a study of conflicts that may exist in their standards concerning Federal buildings, leased space, products purchased or supplied, and other requirements affecting Federal employee safety and health. Both agencies shall establish and publish a joint procedure for resolving conflicting standards. All other Federal agencies that have authority for purchasing equipment, supplies, and materials, and for controlling Government space, as well as the leasing of space, shall also be subject to the requirements of this subpart, including publication of a procedure for resolving conflicting standards.

(a) In order to assist agencies in carrying out their duties under section 19 of the Act, Executive Order 12196, and this part, the Administrator or the Administrator's designee shall:

(1) Upon an agency's request, furnish for any owned or leased space offered to a Federal agency for occupancy:

(i) A report of a recent pre-occupancy inspection to identify serious hazards or serious violations of OSHA standards or approved alternate standards, and

(ii) A plan for abatement of the hazards and violations discovered;

(2) Provide space which:

(i) Meets any special safety and health requirements submitted by the requesting agency, and

(ii) Does not contain either serious hazards or serious violations of OSHA standards or approved alternate standards which cannot be abated;

(3) Repair, renovate, or alter, upon an agency's request, owned or leased space in a planned and controlled manner to

reduce or eliminate, whenever possible, any hazardous exposure to the occupant agency's employees;

(4) Accompany, upon request, the Secretary or the Secretary's designee on any inspection or investigation of a facility subject to the authority of the General Services Administration. Requests made for this purpose shall, whenever possible, be made at the GSA regional level in order to facilitate prompt assistance;

(5) Investigate, upon an official agency request, reports of unsafe or unhealthful conditions within the scope of GSA's responsibility. Such investigation, when requiring an on-site inspection, shall be completed within 24 hours for imminent danger situations, within three working days for potentially serious conditions, and within 20 working days for other safety and health risk conditions;

(6) Abate unsafe or unhealthful conditions disclosed by reports, investigation or inspection within 30 calendar days or submit to the occupant agency's designated liaison official an abatement plan. Such abatement plan shall give priority to the allocation of resources to bring about prompt abatement of the conditions. (GSA shall publish procedures for abatement of hazards in the Federal Property Management Regulations—41 CFR part 101);

(7) Establish an occupancy permit program which will regulate the types of activities and occupancies in facilities in order to avoid incompatible groupings, e.g., chemical or biological laboratories in office space. GSA shall seek to consolidate Federal laboratory operations in facilities designed for such purposes;

(8) Ensure, insofar as possible, that agency safety and health problems still outstanding are resolved, or otherwise answered by acceptable alternatives prior to renegotiation of leases; and

(9) Ensure that GSA or other Federal lessor agencies' building managers maintain a log of reports of unsafe or unhealthful conditions submitted by tenants to include: date of receipt of report, action taken, and final resolution.

(b) *Product safety*. Agencies such as GSA, DOD, and others which procure and provide supplies, equipment, devices, and material for their own use or use by other agencies, except for the design of uniquely military products as set forth in §1960.2(i), shall establish and maintain a product safety program which:

(1) Ensures that items procured will allow user agencies to use such products safely for their designed purpose and will facilitate user compliance with all applicable standards.

(2) Requires that products meet the applicable safety and health requirements of Federal law and regulations issued thereunder;

(3) Ensures that hazardous material will be labelled in accordance with current law or regulation to alert users, shippers, occupational safety and health, and emergency action personnel, and others, to basic information concerning flammability, toxicity, compatibility, first aid procedures, and normal as well as emergency handling and disposal procedures;

(4) Ensures availability of appropriate safety rescue and personal protective equipment to supply user agencies. The writing of Federal procurement specifications will be coordinated by GSA with OSHA/NIOSH as needed to assure purchase of approved products;

(5) Ensures that products recalled by the manufacturer, either voluntarily or by order from a regulatory authority, are removed from inventory. Each recall notice or order shall be forwarded to all agencies which have ordered such product from or through the procuring/supplying Federal agency, e.g., GSA, DOD, etc.;

(6) Includes preparation of FEDSTD 313, Material Safety Data Sheets (MSDS), involving all interested agencies in review to keep the standard current. MSDS provided by agencies or contractors shall meet the requirements of FEDSTD 313 and be furnished to DOD for filing and distribution.

(c) In order to assist agencies in carrying out their duties under section 19 of the Act, Executive Order 12196, and this part, the DOD operates and maintains an automated system to receive, file, reproduce, and make available MSDS data to other Federal agencies through the Government Printing Office or the National Technical Information Services.

(d) All Federal agencies shall use MSDS either provided by DOD, or acquired directly from suppliers, when purchasing hazardous materials (as defined in FEDSTD 313) for local use. These data will be used to develop detailed procedures to advise employees in the workplace of the hazards involved with the materials and to protect them therefrom.

(e) *Safety and health services.* GSA will operate and maintain for user agencies the following services:

(1) Listings in the ''Federal Supply Schedule'' of safety and health services and equipment which are approved for use by agencies when needed. Examples of such services are: Workplace inspections, training, industrial hygiene surveys, asbestos bulk sampling, and mobile health testing; examples of such equipment are: personal protective equipment and apparel, safety devices, and environmental monitoring equipment;

(2) Rules for assistance in the preparation of agency ''Occupant Emergency Plans'' (formerly called ''Facility Self-Protection Plans''), to be published by GSA at 41 CFR part 101;

(3) An effective maintenance program in the Interagency Motorpool System which will ensure the safety and health of Federal employees utilizing the vehicles. Critical items to be included are: Exhaust systems, brakes, tires, lights, steering, and passenger restraint or other crash protection systems; and

(4) A rapid response system whereby agencies can alert GSA to unsafe or unhealthful items purchased or contracted for by GSA, which in turn will evaluate the reports, initiate corrective action, as appropriate, and advise use agencies of interim protective measures.

§ 1960.35 National Institute for Occupational Safety and Health.

(a) The Director of the National Institute for Occupational Safety and Health (NIOSH) shall, upon request by the Secretary, assist in:

(1) Evaluations of Federal agency safety and health programs;

(2) Investigations of possible safety and health hazards and

(3) Inspections resulting from employee or committee reports of unsafe or unhealthful working conditions.

(b) The Director of NIOSH shall provide a Hazard Evaluation (HE) program for Federal agencies. This program shall be designed to respond to requests for assistance in determining whether or not safety or health hazards are present in a Federal workplace. Requests for such Hazard Evaluations may be submitted to the Director by:

(1) The Secretary of Labor;

(2) The Head of a Federal agency;

(3) An agency safety and health committee if half the committee requests such service; and

(4) Employees who are not covered by a certified safety and health committee.

(c) The Director of NIOSH may assist agencies by providing hazard alerts, technical services, training materials and conducting training programs upon request by an agency and with reimbursement.

Subpart F—Occupational Safety and Health Committees

§ 1960.36 General provisions.

(a) The occupational safety and health committees described in this subpart are organized and maintained basically to monitor and assist an agency's safety and health program. These committees assist agencies to maintain an open channel of communication between employees and management concerning safety and health matters in agency workplaces. The committees provide a method by which employees can utilize their knowledge of workplace operations to assist agency management to improve policies, conditions, and practices.

(b) Agencies may elect to establish safety and health committees meeting the minimum requirements contained in this subpart. Where such committees are not established or fail to meet the minimum requirements established by the Secretary, the Secretary is authorized by section 1–401(i) of Executive Order 12196 to conduct unannounced inspections of agency workplaces when the Secretary determines them necessary.

§ 1960.37 Committee organization.

(a) For agencies which elect to utilize the committee concept, safety and health committees shall be formed at both the national level and, for agencies with field or regional offices, at appropriate levels within the agency. To realize exemption from unannounced OSHA inspections, an agency must form a committee at the national level and at any establishment or grouping of establishments that is to be exempt, keeping the Secretary advised of the locations and activities where such committees are functioning.

(1) The principal function of the national level committee shall be to consult and provide policy advice on, and monitor the performance of, the agency-wide safety and health program.

(2) Committees at other appropriate levels shall be established at agency establishments or groupings of establishments consistent with the mission, size and organization of the agency and its collective bargaining configuration. The agency shall form committees at the lowest practicable local level. The principal function of the establishment (or local) committees is to monitor and assist in the execution of the agency's safety and health policies and program at the workplaces within their jurisdiction. Any dispute over the meaning of the term ''appropriate levels'' shall be resolved by the Secretary.

(b) Committees shall have equal representation of management and nonmanagement employees, who shall be members of record.

(1) Management members of both national level and establishment level committees shall be appointed in writing by the person empowered to make such appointments.

(2) Nonmanagement members of establishment level committees shall represent all employees of the establishment and shall be determined according to the following rules:

(i) Where employees are represented under collective bargaining arrangements, members shall be appointed from among those recommended by the exclusive bargaining representative;

(ii) Where employees are not represented under collective bargaining arrangements, members shall be determined through procedures devised by the agency which provide for effective representation of all employees; and

(iii) Where some employees of an establishment are covered under collective bargaining arrangements and others are not, members shall be representative of both groups.

(3) Nonmanagement members of national level committees shall be determined according to the following rules:

(i) Where employees are represented by organizations having exclusive recognition on an agency basis or by organizations having national consultation rights, some members shall be determined in accordance with the terms of collective bargaining agreements and some members shall be selected from those organizations having consultation rights, and

(ii) Where employees are not represented by organizations meeting the criteria of paragraph (b)(3)(i) of this section, members shall be determined through procedures devised by the agency which provide for effective representation of all employees.

(c) Committee members should serve overlapping terms. Such terms should be of at least two years duration, except when the committee is initially organized.

(d) The committee chairperson shall be nominated from among the committee's members and shall be elected by the committee members. Management and nonmanagement members should alternate in this position. Maximum service time as chairperson should be two consecutive years.

(e) Committees shall establish a regular schedule of meetings and special meetings shall be held as necessary; establishment level committees shall meet at least quarterly and national committees shall meet at least annually.

(f) Adequate advance notice of committee meetings shall be furnished to employees and each meeting shall be conducted pursuant to a prepared agenda.

(g) Written minutes of each committee meeting shall be maintained and distributed to each committee member, and upon request, shall be made available to employees and to the Secretary.

§ 1960.38 Committee formation.

(a) Upon forming such committees, heads of agencies shall submit information to the Secretary concerning the existence, location, and coverage, in terms of establishments and population, of such committees, certifying to the Secretary that such committees meet the requirements of this subpart. The information submitted should include the name and telephone numbers of the chairperson of each committee, and should be updated annually as part of the annual report required by § 1960.74 to reflect any changes that may have occurred.

(b) If, upon evaluation, the Secretary determines that the operations of a committee do not meet the requirements of this subpart, the Secretary shall notify the agency and identify the deficiencies to be remedied. If the agency does not satisfy the Secretary within 90 days that the committee meets the requirements of this subpart, the committee shall not be deemed a committee under Executive Order 12196 and this part.

[45 FR 69798, Oct. 21, 1980; 45 FR 77003, Nov. 21, 1980, as amended at 49 FR 3080, Jan. 24, 1984]

§ 1960.39 Agency responsibilities.

(a) Agencies shall make available to committees all agency information relevant and necessary to their duties, except where prohibited by law. Examples of such information include, but are not limited to: The agency's safety and health policies and program; human and financial resources available to implement the program; accident, injury, and illness data; epidemiological data; employee exposure monitoring data; Material Safety Data Sheets; inspection reports; reprisal investigation reports; abatement plans; NIOSH hazard evaluation reports; and internal and external evaluation reports.

(b) Agencies shall provide all committee members appropriate training as required by subpart H of this part.

§ 1960.40 Establishment committee duties.

(a) The safety and health committee is an integral part of the safety and health program, and helps ensure effective implementation of the program at the establishment level.

(b) An establishment committee formed under this subpart shall, except where prohibited by law:

(1) Monitor and assist the safety and health program at establishments under its jurisdiction and make recommendations to the official in charge on the operation of the program;

(2) Monitor findings and reports of workplace inspections to confirm that appropriate corrective measures are implemented;

(3) When requested by the agency Safety and Health Official, or when the committee deems it necessary for effective monitoring of agency establishment inspection procedures, participate in inspections of the establishment;

(4) Review internal and external evaluation reports and make recommendations concerning the establishment safety and health program;

(5) Review, and recommend changes, as appropriate, to procedures for handling safety and health suggestions and recommendations from employees;

(6) When requested by the Designated Agency Safety and Health Official, or when the committee deems it necessary, comment on standards proposed pursuant to the provisions of subpart C of this part;

(7) Monitor and recommend changes, as required, in the level of resources allocated and spent on the establishment safety and health program;

(8) Review agency responses to reports of hazardous conditions, safety and health program deficiencies, and allegations of reprisal;

(9) Report their dissatisfaction to the Secretary if half a committee determines there are deficiencies in the establishment's safety and health program or is not satisfied with the agency's reports of reprisal investigations; and

(10) Request the Secretary to conduct an evaluation or inspection if half the members of record are not satisfied with an agency's response to a report of hazardous working conditions.

§ 1960.41 National committee duties.

National committees established under this subpart shall, except where prohibited by law:

(a) Monitor performance of the agency safety and health program and make policy recommendations to the head of the agency on the operation of the program;

(b) Monitor and assist in the development and operation of the agency's establishment committees. As the committee deems appropriate, monitor and review: Reports of inspections; internal and external evaluation reports; agency safety and health training programs; proposed agency standards; agency plans for abating hazards; and responses to reports of hazardous conditions; safety and health program deficiencies; and allegations of reprisal;

(c) Monitor and recommend changes in the resources allocated to the entire agency safety and health program;

(d) Report their dissatisfaction to the Secretary if half a committee determines there are deficiencies in the agency's safety and health program or is not satisfied with the agency's reports of reprisal investigations; and

(e) Request the Secretary to conduct an evaluation or inspection if half the members of record are not satisfied with an agency's response to a report of hazardous working conditions.

Subpart G—Allegations of Reprisal

§ 1960.46 Agency responsibility.

(a) The head of each agency shall establish procedures to assure that no employee is subject to restraint, interference, coercion, discrimination or reprisal for filing a report of an unsafe or unhealthful working condition, or other participation in agency occupational safety and health program activities, or because of the exercise by such employee on behalf of himself or herself or others of any right afforded by section 19 of the Act, Executive Order 12196, or this part. These rights include, among other, the right of an employee to decline to perform his or her assigned task because of a reasonable belief that, under the circumstances the task poses an imminent risk of death or serious bodily harm coupled with a reasonable belief that there is insufficient time to seek effective redress through normal hazard reporting and abatement procedures established in accordance with this part.

(b) Based on the Secretary's evaluation of agencies' procedures for protecting employees from reprisal, the Secretary shall report to the President by September 30, 1982 his findings and recommendations for improvements in procedures for the investigation and resolution of allegations of reprisal.

§ 1960.47 Results of investigations.

Each agency shall keep occupational safety and health committees advised of agency activity regarding allegations of reprisal and any agency determinations thereof. Agency officials shall provide copies of reprisal investigation findings, if any, to the Secretary and to the appropriate safety and health committee.

Subpart H—Training

§ 1960.54 Training of top management officials.

Each agency shall provide top management officials with orientation and other learning experiences which will enable them to manage the occupational safety and health programs of their agencies. Such orientation should include coverage of section 19 of the Act, Executive Order 12196, the requirements of this part, and the agency safety and health program.

§ 1960.55 Training of supervisors.

(a) Each agency shall provide occupational safety and health training for supervisory employees that includes: supervisory responsibility for providing and maintaining safe and healthful working conditions for employees, the agency occupational safety and health program, section 19 of the Act, Executive Order 12196, this part, occupational safety and health standards applicable to the assigned workplaces, agency procedures for reporting hazards, agency procedures for reporting and investigating allegations of reprisal, and agency procedures for the abatement of hazards, as well as other appropriate rules and regulations.

(b) This supervisory training should include introductory and specialized courses and materials which will enable supervisors to recognize and eliminate, or reduce, occupational safety and health hazards in their working units. Such training shall also include the development of requisite skills in managing the agency's safety and health program within the work unit, including the training and motivation of subordinates toward assuring safe and healthful work practices.

§ 1960.56 Training of safety and health specialists.

(a) Each agency shall provide occupational safety and health training for safety and health specialists through courses, laboratory experiences, field study, and other formal learning experiences to prepare them to perform the necessary technical monitoring, consulting, testing, inspecting, designing, and other tasks related to program development and implementation, as well as hazard recognition, evaluation and control, equipment and facility design, standards, analysis of accident, injury, and illness data, and other related tasks.

(b) Each agency shall implement career development programs for their occupational safety and health specialists to enable the staff to meet present and future program needs of the agency.

§ 1960.57 Training of safety and health inspectors.

Each agency shall provide training for safety and health inspectors with respect to appropriate standards, and the use of appropriate equipment and testing procedures necessary to identify and evaluate hazards and suggest general abatement procedures during or following their assigned inspections, as well as preparation of reports and other documentation to support the inspection findings.

§ 1960.58 Training of collateral duty safety and health personnel and committee members.

Within six months after October 1, 1980, or on appointment of an employee to a collateral duty position or to a committee, each agency shall provide training for collateral duty safety and health personnel and all members of certified occupational safety and health committees commensurate with the scope of their assigned responsibilities. Such training shall include: The agency occupational safety and health program; section 19 of the Act; Executive Order 12196; this part; agency procedures for the reporting, evaluation and abatement of hazards; agency procedures for reporting and investigating allegations of reprisal, the recognition of hazardous conditions and environments; identification and use of occupational safety and health standards, and other appropriate rules and regulations.

§ 1960.59 Training of employees and employee representatives.

(a) Each agency shall provide appropriate safety and health training for employees including specialized job safety and health training appropriate to the work performed by the employee, for example: Clerical; printing; welding; crane operation; chemical analysis, and computer operations. Such training also shall inform employees of the agency occupational safety and health program, with emphasis on their rights and responsibilities.

(b) Occupational safety and health training for employees of the agency who are representatives of employee groups, such as labor organizations which are recognized by the agency, shall include both introductory and specialized courses and materials that will enable such groups to function appropriately in ensuring safe and healthful working conditions and practices in the workplace and enable them to effectively assist in conducting workplace safety and health inspections. Nothing in this paragraph shall be construed to alter training provisions provided by law, Executive Order, or collective bargaining arrangements.

§ 1960.60 Training assistance.

(a) Agency heads may seek training assistance from the Secretary of Labor, the National Institute for Occupational Safety and Health and other appropriate sources.

(b) After the effective date of Executive Order 12196, the Secretary shall, upon request and with reimbursement, conduct orientation for Designated Agency Safety and Health Officials and/or their designees which will enable them to manage the occupational safety and health programs of their agencies. Such orientation shall include coverage of section 19 of the Act, Executive Order 12196, and the requirements of this part.

(c) Upon request and with reimbursement, the Department of Labor shall provide each agency with training materials to assist in fulfilling the training needs of this subpart, including resident and field training courses designed to meet selected training needs of agency safety and health specialists, safety and health inspectors, and collateral duty safety and health personnel. These materials and courses in no way reduce each agency's responsibility to provide whatever specialized training is required by the unique characteristics of its work.

(d) In cooperation with OPM, the Secretary will develop guidelines and/or provide materials for the safety and health training programs for high-level managers, supervisors, members of committees, and employee representatives.

Subpart I—Recordkeeping and Reporting Requirements

SOURCE: 69 FR 68804, Nov. 26, 2004, unless otherwise noted.

§ 1960.66 Purpose, scope and general provisions.

(a) The purpose of this subpart is to establish uniform requirements for collecting and compiling by agencies of occupational safety and health data, for proper evaluation and necessary corrective action, and to assist the Secretary in meeting the requirement to develop and maintain an effective program of collection, compilation, and analysis of occupational safety and health statistics.

(b) Except as modified by this subpart, Federal agency injury and illness recording and reporting requirements shall comply with the requirements under 29 CFR Part 1904, subparts C, D, E, and G, except that the definition of ''establishment'' found in 29 CFR 1960.2(h) will remain applicable to Federal agencies.

(c) Each agency shall utilize the information collected through its management information system to identify unsafe and unhealthful working conditions, and to establish program priorities.

(d) The provisions of this subpart are not intended to discourage agencies from utilizing recordkeeping and reporting forms which contain a more detailed breakdown of information than the recordkeeping and reporting forms provided by the Department of Labor. Because of the unique nature of the national recordkeeping program, Federal agencies must have recording and reporting requirements that are the same as 29 CFR Part 1904 for determining which injuries and illnesses will be entered into the records and how they are entered. All other injury and illness recording and reporting requirements used by any Federal agency may be more stringent than, or supplemental to, the requirements of 29 CFR Part 1904, but must not interfere with the agency's ability to provide the injury and illness information required by 29 CFR Part 1904.

(e) Information concerning occupational injuries and illnesses or accidents which, pursuant to statute or Executive Order, must be kept secret in the interest of national defense or foreign policy shall be recorded on separate forms. Such records shall not be submitted to the Department of Labor but may be used by the appropriate Federal agency in evaluating the agency's program to reduce occupational injuries, illnesses and accidents.

NOTE TO § 1960.66: The recording or reporting of a work-related injury, illness or fatality does not constitute an admission that the Federal agency, or other individual was at fault or otherwise responsible for purposes of liability. Such recording or reporting does not constitute an admission of the existence of an employer/employee relationship between the individual recording the injury and the injured individual. The recording or reporting of any such injury, illness or fatality does not mean that an OSHA rule has been violated or that the individual in question is eligible for workers' compensation or any other benefits. The requirements of this part do not diminish or modify in any way a

Federal agency's responsibilities to report or record injuries and illnesses as required by the Office of Workers' Compensation Programs under the Federal Employees' Compensation Act (FECA), 5 U.S.C. 8101 *et seq.*

§ 1960.67 Federal agency certification of the injury and illness annual summary (OSHA 300–A or equivalent).

As required by 29 CFR 1904.32, a company executive must certify that he or she has examined the OSHA 300 Log and that he or she believes, based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete. For Federal establishments, the person who performs the certification shall be one of the following:

(a) The senior establishment management official,

(b) The head of the Agency for which the senior establishment management official works, or

(c) Any management official who is in the direct chain of command between the senior establishment management official and the head of the Agency.

NOTE TO § 1960.67: The requirement for certification of Federal agency injury and illness records in this section is necessary because the private sector position titles contained in 29 CFR part 1904 do not fit the Federal agency position titles for agency executives. The Federal officials listed in this section are intended to be the equivalent of the private sector officials who are required to certify records under § 1904.32(b)(4).

§ 1960.68 Prohibition against discrimination.

Section 1904.36 of this chapter refers to Section 11(c) of the Occupational Safety and Health Act. For Federal agencies, the words ''Section 11(c)'' shall be read as ''Executive Order 12196 Section 1–201(f).''

NOTE TO § 1960.68: Section 11(c) of the Occupational Safety and Health Act only applies to private sector employers and the U.S. Postal Service. The corresponding prohibitions against discrimination applicable to Federal employers are contained in Section 1–201(f) of Executive Order 12196, 45 FR 12769, 3 CFR, 1980 Comp. p. 145.

§ 1960.69 Retention and updating of old forms.

Federal agencies must retain copies of the recordkeeping records utilized under the system in effect prior to January 1, 2005 for five years following the year to which they relate and continue to provide access to the data as though these forms were the OSHA Form 300 Log and Form 301 Incident Report. Agencies are not required to update the old forms.

§ 1960.70 Reporting of serious accidents.

Agencies must provide the Office of Federal Agency Programs with a summary report of each fatal and catastrophic accident investigation. The summaries shall address the date/time of accident, agency/establishment named and location, and consequences, description of operation and the accident, causal factors, applicable standards and their effectiveness, and agency corrective/preventive actions.

NOTE TO § 1960.70: The requirements of this section are in addition to the requirements for reporting fatalities and multiple hospitalization incidents to OSHA under 29 CFR 1904.39.

§ 1960.71 Agency annual reports.

(a) The Act and E.O. 12196 require all Federal agency heads to submit to the Secretary an annual report on their agency's occupational safety and health program, containing such information as the Secretary prescribes.

(1) Each agency must submit to the Secretary by January 1 of each year a report describing the agency's occupational safety and health program of the previous fiscal year and objectives for the current fiscal year. The report shall include a summary of the agency's self-evaluation findings as required by § 1960.78(b).

(2) The Secretary must provide the agencies with the guidelines and format for the reports at the time they are requested.

(3) The agency reports will be used in preparing the Secretary's report to the President.

(b) The Secretary will submit to the President by October 1 of each year a summary report of the status of the occupational safety and health of Federal

employees based on agency reports, evaluations of individual agency progress and problems in correcting unsafe or unhealthful working conditions, and recommendations for improving their performance.

§§ 1960.72–1960.74 [Reserved]

Subpart J—Evaluation of Federal Occupational Safety and Health Programs

§ 1960.78 Purpose and scope.

(a) The purpose of this subpart is to establish a comprehensive program for the evaluation of Federal employee occupational safety and health programs. This subpart includes the responsibilities of agency heads in conducting self-evaluations of the effectiveness of their occupational safety and health programs, and the responsibilities of the Secretary in evaluating the extent to which each agency head has developed and implemented agency programs in accordance with the requirements of Executive Order 12196 and this part.

(b) Agency heads shall develop and implement a program for evaluating the effectiveness of their agency's occupational safety and health program. An annual summary report shall be submitted to the Secretary covering self-evaluations conducted during the previous year.

(c) The Secretary shall conduct a comprehensive evaluation of each Federal agency's occupational safety and health program. Evaluations shall be conducted on a regular schedule to determine the performance levels of each agency's program. The Secretary shall submit to the President each year: A summary report of the status of the occupational safety and health of Federal employees; Department of Labor evaluations, together with agency responses, of individual agency progress and problems in correcting unsafe and unhealthful working conditions, and recommendations for improving agency's performance.

§ 1960.79 Self-evaluations of occupational safety and health programs.

Agency heads shall develop and implement a program of self-evaluations to determine the effectiveness of their occupational safety and health programs. The self-evaluations are to include qualitative assessments of the extent to which their agency safety and health programs are:

(a) Developed in accordance with the requirements set forth in Executive Order 12196 and this part and,

(b) Implemented effectively in all agency field activities.

Agencies needing assistance in developing a self-evaluation program should contact the Secretary.

§ 1960.80 Secretary's evaluations of agency occupational safety and health programs.

(a) In accordance with section 1–401(h), the Secretary shall develop a comprehensive program for evaluating an agency's occupational safety and health program. To accomplish this, the Secretary shall conduct:

(1) A complete and extensive evaluation of all elements of an agency's occupational safety and health program on a regular basis;

(2) Special studies of limited areas of an agency's occupational safety and health program as deemed necessary by the Secretary; and

(3) Field reviews and scheduled inspections of agency workplaces as deemed necessary by the Secretary.

(b) The Secretary shall develop and distribute to Federal agencies detailed information on the Department of Labor's evaluation program. The information shall include, but is not limited to:

(1) The major program elements included in a complete and extensive evaluation of an agency's occupational safety and health program;

(2) The methods and factors used to determine the effectiveness of each element of an agency's program;

(3) The factors used to define ''large'' or ''more hazardous'' Federal agencies, establishments, or operations;

(4) The procedures for conducting evaluations including field visits and scheduled inspections; and

(5) The reporting format for agency heads in submitting annual summaries of their self-evaluation programs.

(c) Prior to the initiation of an agency evaluation, the Department of

Labor will review the annual agency self-evaluation summary report. The Secretary will then develop a program evaluation plan before the initiation of an agency evaluation. A copy of the plan shall be furnished to the agency to be evaluated at the time of the notification of the evaluation.

(d) To facilitate the evaluation process and to insure full understanding of the procedures to be followed and the support required from the agency, the Secretary, or the Secretary's representative, shall conduct an opening conference with the agency head or designee. At the opening conference, the Secretary's authority and evaluation plan will be explained.

(e) The agency evaluation should be completed within 90 calendar days of the date of the opening conference.

(f) A report of the evaluation shall be submitted to the agency head by the Secretary within 90 calendar days from the date of the closing conference.

(g) Agency heads shall respond to the evaluation report within 60 calendar days of receipt of the report.

[45 FR 69798, Oct. 21, 1980; 45 FR 77003, Nov. 21, 1980]

Subpart K—Field Federal Safety and Health Councils

§ 1960.84 Purpose.

(a) Executive Order 12196 provides that the Secretary shall ''facilitate the exchange of ideas and information throughout the Government about occupational safety and health.''

(b) Consistent with this objective, the Secretary will continue to sponsor and/or provide guidance for those Field Federal Safety and Health Councils now established and in operation, and establish new field councils as necessary. The field councils will consist primarily of qualified representatives of local area Federal field activities whose duties pertain to occupational safety and health, and also of representatives of recognized local labor organizations, or other civilian employee organizations, at local area Federal field activities. For the purpose of this subpart the definition of field activity will be provided by each agency.

§ 1960.85 Role of the Secretary.

(a) The Secretary shall maintain liaison with agency heads to ensure that they encourage their field activities to participate actively in field council programs. To ensure maximum participation, the field councils' annual reports to the Secretary shall provide descriptions of the degree of management and employee participation by the defined Federal field activities. The Secretary shall annually furnish each agency head with a report consolidating the information received as to the participation of the agency's several field installations in field council activities.

(b) The Secretary shall provide leadership and guidance and make available necessary equipment, supplies, and staff services to the Field Federal Safety and Health Councils to assist them in carrying out their responsibilities. The Secretary shall also provide consultative and technical services to field councils. These services shall involve aid in any phase of developing and planning programs; and in sponsoring, conducting or supporting safety and health training courses.

§ 1960.86 Establishing councils.

(a) Those field councils established and in operation prior to the effective date of this subpart will continue to function without interruption provided they are operating in accordance with the provision of their charter and this subpart.

(b) The Secretary may establish a council in any area where ten or more Federal establishments totaling 300 or more employees are located within an area having a radius of 50 miles, and there is substantial agreement among the agencies that such a council would be useful. In any such area where there is no council already established, a field representative of the Secretary may, upon his own initiative or at the request of any establishment within the area, contact representatives of all establishments within the area and encourage the organization of a field council.

(c) After a new council has been organized, officers elected, and articles of organization drafted and accepted by

the council membership, a formal request for recognition as a field council shall be sent to the Secretary. Upon approval of the Articles of Organization, a charter will be issued.

(d) At the first general meeting of the council, committees should be appointed and the cooperation of all participants should be solicited to aid the functioning of committees and the successful accomplishment of the council's objectives.

§ 1960.87 Objectives.

The basic objective of field councils is to facilitate the exchange of ideas and information to assist agencies to reduce the incidence, severity and cost of occupational accidents, injuries, and illnesses. Field councils shall act on behalf of the Secretary or his designees on occupational safety and health activities in carrying out within their respective geographic areas the following functions:

(a) To act as a clearinghouse on information and data on occupational accidents, injuries, and illnesses and their prevention.

(b) To plan, organize and conduct field council meetings or programs which will give technical advice and information on occupational safety and health to representatives of participating agencies and employee organizations.

(c) To promote improvement of safety and health programs and organizations in each Federal agency represented or participating in council activities.

(d) To promote coordination, cooperation, and sharing of resources and expertise to aid agencies with inadequate or limited resources. These objectives can be accomplished in a variety of ways. For example, field councils could organize and conduct training programs for employee representatives, collateral duty and professional safety and health personnel, coordinate or promote programs for inspections, or, on request, conduct inspections and evaluations of the agencies' safety and health programs.

(e) To provide Federal Executive Boards, Federal Executive Associations, labor union organizations and other employee representatives with information on the administrative and technical aspects of safety and health programs.

(f) To evaluate the safety and health problems peculiar to local conditions and facilitate solutions to these problems through council activities.

(g) To develop a cooperative relationship with local community leaders by informing them of the existing functions and objectives of the council and by calling on them for support and participation in council meetings and activities.

§ 1960.88 Membership and participation.

(a) Each field council shall consist of the designated representatives of local Federal activities appointed by their respective activity heads, after consultation with appropriate employee representatives and appropriate certified safety and health committees.

(b) Federal agency heads should encourage each field activity having responsibility for the safety and health of agency employees to participate in the programs of these councils.

(c) Each activity head shall appoint an equal number of officially designated representatives (with designated alternates), from management and from nonmanagement employees, consistent with applicable collective bargaining arrangements.

(d) Representatives shall be selected from individuals in the following categories:

(1) Federal occupational safety and health professionals.

(2) Related Federal professionals, or collateral duty personnel. This includes persons employed in professions or occupations related to or concerned with safety and health of employees.

(3) Line management officials.

(4) Representatives of recognized Federal labor or other employee organizations.

(i) Where certified occupational safety and health committees exist, nonmanagement members of the committees shall be given the opportunity to select one individual for official appointment to field councils by the activity head.

(ii) Where employees are represented by collective bargaining arrangements,

but no committee exists, nonmanagement members of field councils shall be selected from among those recommended by the exclusive bargaining representatives for official appointment to field councils by the activity head.

(iii) Where some employees in an activity are represented by collective bargaining arrangements and others are not, the agency head should solicit nominations for the agency's designated nonmanagement representative and alternate both from lawful labor organization(s) with collective bargaining status and from employees not represented through collective bargaining and should select from the nominees for official appointment as designated employee representatives on the field council.

(e) Representatives from non-Federal organizations. Associate membership may be granted to any non-Federally employed person who demonstrated interest in occupational safety and health. An associate member has no voting rights and may not hold any office.

(f) No maximum limitation shall be imposed by a council on itself, in regard to the numbers of personnel in any of the above categories that may attend meetings and/or participate in field council activities. An agency is free to have any number of individuals, in addition to the officially designated representatives participate in council activities.

(g) Only officially designated agency representatives or their alternates shall have voting privileges. All representatives and participants shall serve without additional compensation.

(h) Travel funds shall be made available equally to management and nonmanagement employee representatives.

§ 1960.89 Organization.

(a) Field council officers shall include, as a minimum, a chairperson, vice chairperson, and secretary. Officers shall be elected for a one or two-year term on a calendar year basis by a majority vote of the designated representatives. Election of officers shall be held at least 60 days before the beginning of a calendar year. The election may be conducted at a regularly scheduled meeting or by letter ballot.

(b) Each council shall notify the appropriate OSHA Regional Office and the Office of Federal Agency Safety and Health Programs of the name, agency address, and telephone number of each newly elected official.

(c) Each council shall have an Executive Committee consisting of all elected officers, chairpersons of appointed committees and the immediate past chairperson of the field council.

(d) In addition to the Executive Committee, each council shall have either a membership committee, a program committee and a finance committee, or a council official designated responsibility in these areas. Additional committees may be appointed by the chairperson for specific purposes as warranted.

§ 1960.90 Operating procedures.

(a) The Executive Committee of each council shall meet at least 45 days before the beginning of each calendar year to approve an annual program for the council designed to accomplish the objectives and functions stated in § 1960.87. In addition, the Executive Committee shall meet periodically to ensure that the meetings and other activities of the council are being conducted as outlined in the council schedule.

(b) The council program shall include at least four meetings or activities per year dealing with occupational safety and health issues.

(c) Each field council shall submit to the Secretary or his designee by March 15 of each year a report describing the activities and programs of the previous calender year and plans for the current year. In addition, the report shall address the participation and attendance of designated representatives of the council. The Office of Federal Agency Safety and Health Programs, OSHA, shall furnish guidelines to field councils concerning the preparation of this report.

(d) Upon determination that a council is not operating in accordance with its charter and the provisions of this subpart, and after consultation with appropriate OSHA regional officials,

the Secretary shall revoke the council's charter. Upon revocation of a charter, the council shall surrender all its government property to the appropriate OSHA regional official. Any continuing or future organization in the same geographical area shall not use the title Field Federal Safety and Health Council, or any derivation thereof, unless formally rechartered by the Secretary. Notification of revocation of a council's charter shall be sent to the chairperson, where identifiable, and to the appropriate OSHA Regional Office.

PART 1975—COVERAGE OF EMPLOYERS UNDER THE WILLIAMS-STEIGER OCCUPATIONAL SAFETY AND HEALTH ACT OF 1970

Sec.

1975.1 Purpose and scope.
1975.2 Basis of authority.
1975.3 Extent of coverage.
1975.4 Coverage.
1975.5 States and political subdivisions thereof.
1975.6 Policy as to domestic household employment activities in private residences.

AUTHORITY: Secs. 2, 3, 4, 8, Occupational Safety and Health Act of 1970 (29 U.S.C. 651, 652, 653, 657); Secretary of Labor's Order No. 12–71 (36 FR 8754).

SOURCE: 37 FR 929, Jan. 21, 1972, unless otherwise noted.

§ 1975.1 Purpose and scope.

(a) Among other things, the Williams-Steiger Act poses certain duties on employers. This part has the limited purpose and scope of clarifying which persons are considered to be employers either as a matter of interpretation of the intent and terms of the Act or as a matter of policy appropriate to administering and enforcing the Act. In short, the purpose and scope of this part is to indicate which persons are covered by the Act as employers and, as such, subject to the requirements of the Act.

(b) It is not the purpose of this part to indicate the legal effect of the Act, once coverage is determined. Section 4(b)(1) of the Act provides that the statute shall be inapplicable to working conditions to the extent they are subject to another Federal agency's exercise of different statutory authority affecting the occupational safety and health aspects of those conditions. Therefore, a person may be considered an employer covered by the Act, and yet standards issued under the Act respecting certain working conditions would not be applicable to the extent those conditions were subject to another agency's authority.

§ 1975.2 Basis of authority.

The power of Congress to regulate employment conditions under the Williams-Steiger Occupational Safety and Health Act of 1970, is derived mainly from the Commerce Clause of the Constitution. (section 2(b), Pub. L. 91–596; U.S. Constitution, Art. I, Sec. 8, Cl. 3; ''United States v. Darby,'' 312 U.S. 100.) The reach of the Commerce Clause extends beyond Federal regulation of the channels and instrumentalities of interstate commerce so as to empower Congress to regulate conditions or activities which affect commerce even though the activity or condition may itself not be commerce and may be purely intrastate in character. (''Gibbons v. Ogden,'' 9 Wheat. 1, 195; ''United States v. Darby,'' supra; ''Wickard v. Filburn,'' 317 U.S. 111, 117; and ''Perez v. United States,'' 91 S. Ct. 1357 (1971).) And it is not necessary to prove that any particular intrastate activity affects commerce, if the activity is included in a class of activities which Congress intended to regulate because the class affects commerce. (''Heart of Atlanta Motel, Inc. v. United States,'' 379 U.S. 241; ''Katzenbach v. McClung,'' 379 U.S. 294; and ''Perez v. United States,'' supra.) Generally speaking, the class of activities which Congress may regulate under the commerce power may be as broad and as inclusive as Congress intends, since the commerce power is plenary and has no restrictions placed on it except specific constitutional prohibitions and those restrictions Congress, itself, places on it. (''United States v. Wrightwood Dairy Co.,'' 315 U.S. 110; and ''United States v. Darby,'' supra.) Since there are no specific constitutional prohibitions involved, the issue is reduced to

Executive Order 12196--Occupational safety and health programs for Federal employees

Source: The provisions of Executive Order 12196 of Feb. 26, 1980, appear at 45 FR 12769, 3 CFR, 1980 Comp., p. 145, unless otherwise noted.

By the authority vested in me as President by the Constitution and statutes of the United States of America, including Section 7902(c) of Title 5 of the United States Code and in accord with Section 19 of the Occupational Safety and Health Act of 1970, as amended (29 U.S.C. 668), it is ordered:

1-1. *Scope of this Order.*

1-101. This order applies to all agencies of the Executive Branch except military personnel and uniquely military equipment, systems, and operations.

1-102. For the purposes of this order, the term "agency" means an Executive department, as defined in 5 U.S.C. 101, or any employing unit or authority of the Federal government, other than those of the judicial and legislative branches. Since section 19 of the Occupational Safety and Health Act ("the Act") covers all Federal employees, however, the Secretary of Labor ("the Secretary") shall cooperate and consult with the heads of agencies in the legislative and judicial branches of the government to help them adopt safety and health programs.

1-2. *Heads of Agencies.*

1-201. The head of each agency shall:
(a) Furnish to employees places and conditions of employment that are free from recognized hazards that are causing or are likely to cause death or serious physical harm.
(b) Operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.
(c) Designate an agency official with sufficient authority to represent the interest and support of the agency head to be responsible for the management and administration of the agency occupational safety and health program.
(d) Comply with all standards issued under section 6 of the Act, except where the Secretary approves compliance with alternative standards. When an agency head determines it necessary to apply a different standard, that agency head shall, after consultation with appropriate occupational safety and health committees where established, notify the Secretary and provide justification that equivalent or greater protection will be assured by the alternate standard.
(e) Assure prompt abatement of unsafe or unhealthy working conditions. Whenever an agency cannot promptly abate such conditions, it shall develop an abatement plan setting forth a timetable for abatement and a summary of interim steps to protect employees. Employees exposed to the conditions shall be informed of the provisions of the plan. When a hazard cannot be abated without assistance of the General Services Administration or other Federal lessor agency, an agency shall act with the lessor agency to secure abatement.
(f) Establish procedures to assure that no employee is subject to restraint, interference, coercion, discrimination or reprisal for filing a report of an unsafe or unhealthy working condition, or other participation in agency occupational safety and health program activities.
(g) Assure that periodic inspections of all agency workplaces are performed by personnel with equipment and competence to recognize hazards.
(h) Assure response to employee reports of hazardous conditions and require inspections within twenty-four hours for imminent dangers, three working days for potential serious conditions, and twenty working

days for other conditions. Assure the right to anonymity of those making the reports.
(i) Assure that employee representatives accompany inspections of agency workplaces.
(j) Operate an occupational safety and health management information system, which shall include the maintenance of such records as the Secretary may require.
(k) Provide safety and health training for supervisory employees, employees responsible for conducting occupational safety and health inspections, all members of occupational safety and health committees where established, and other employees.
(*l*) Submit to the Secretary an annual report on the agency occupational safety and health program that includes information the Secretary prescribes.

1-3. *Occupational Safety and Health Committees.*

1-301. Agency heads may establish occupational safety and health committees. If committees are established, they shall be established at both the national level and, for agencies with field or regional offices, other appropriate levels. The committees shall be composed of representatives of management and an equal number of nonmanagement employees or their representatives. Where there are exclusive bargaining representatives for employees at the national or other level in an agency, such representatives shall select the appropriate nonmanagement members of the committee.

1-302. The committees shall, except where prohibited by law,
(a) Have access to agency information relevant to their duties, including information on the nature and hazardousness of substances in agency workplaces.
(b) Monitor performance, including agency inspections, of the agency safety and health programs at the level they are established.
(c) Consult and advise the agency on the operation of the program.

1-303. A Committee may request the Secretary of Labor to conduct an evaluation or inspection pursuant to this order if half of a Committee is not substantially satisfied with an agency's response to a report of hazardous working conditions.

1-4. *Department of Labor.*

1-401. The Secretary of Labor shall:
(a) Provide leadership and guidance to the heads of agencies to assist them with their occupational safety and health responsibilities.
(b) Maintain liaison with the Office of Management and Budget in matters relating to this order and coordinate the activities of the Department with those of other agencies that have responsibilities or functions related to Federal employee safety and health, including the Office of Personnel Management, the Department of Health and Human Services, and the General Services Administration.
(c) Issue, subject to the approval of the Director of the Office of Management and Budget, and in consultation with the Federal Advisory Council on Occupational Safety and Health, a set of basic program elements. The program elements shall help agency heads establish occupational safety and health committees and operate effective occupational safety and health programs, and shall provide flexibility to each agency head to implement a program consistent with its mission, size and organization. Upon request of an agency head, and after consultation with the Federal Advisory Council on Occupational Safety and Health, the Secretary may approve alternate program elements.
(d) Prescribe recordkeeping and reporting requirements.
(e) Assist agencies by providing training materials, and by conducting training programs upon request and with reimbursement.
(f) Facilitate the exchange of ideas and information throughout the government about occupational safety and health.

(g) Provide technical services to agencies upon request, where the Secretary deems necessary, and with reimbursement. These services may include studies of accidents, causes of injury and illness, identification of unsafe and unhealthful working conditions, and means to abate hazards.
(h) Evaluate the occupational safety and health programs of agencies and promptly submit reports to the agency heads. The evaluations shall be conducted through such scheduled headquarters or field reviews, studies or inspections as the Secretary deems necessary, at least annually for the larger or more hazardous agencies or operations, and as the Secretary deems appropriate for the smaller or less hazardous agencies.
(i) Conduct unannounced inspections of agency workplaces when the Secretary determines necessary if an agency does not have occupational safety and health committees; or in response to reports of unsafe or unhealthful working conditions, upon request of occupational safety and health committees under Section 1-3; or, in the case of a report of an imminent danger, when such a committee has not responded to an employee who has alleged to it that the agency has not adequately responded to a report as required in 1-201(h). When the Secretary or his designee performs an inspection and discovers unsafe or unhealthy conditions, a violation of any provisions of this order, or any safety or health standards adopted by an agency pursuant to this order, or any program element approved by the Secretary, he shall promptly issue a report to the head of the agency and to the appropriate occupational safety and health committee, if any. The report shall describe the nature of the findings and may make recommendations for correcting the violation.
(j) Submit to the President each year a summary report of the status of the occupational safety and health of Federal employees, and, together with agency responses, evaluations of individual agency progress and problems in correcting unsafe and unhealthful working conditions, and recommendations for improving their performance.
(k) Submit to the President unresolved disagreements between the Secretary and agency heads, with recommendations.
(*l*) Enter into agreements or other arrangements as necessary or appropriate with the National Institute for Occupational Safety and Health and delegate to it the inspection and investigation authority provided under this section.

[Sec. 1-401 amended by Executive Order 12608 of Sept. 9, 1987, 52 FR 34617, 3 CFR, 1987 Comp., p. 245]

1-5. *The Federal Advisory Council on Occupational Safety and Health.*

1-501. The Federal Advisory Council on Occupational Safety and Health, established pursuant to Executive Order No. 11612, is continued. It shall advise the Secretary in carrying out responsibilities under this order. The Council shall consist of sixteen members appointed by the Secretary, of whom eight shall be representatives of Federal agencies and eight shall be representatives of labor organizations representing Federal employees. The members shall serve three-year terms with the terms of five or six members expiring each year, provided this Council is renewed every two years in accordance with the Federal Advisory Committee Act. The members currently serving on the Council shall be deemed to be its initial members under this order and their terms shall expire in accordance with the terms of their appointment.

1-502. The Secretary, or a designee, shall serve as the Chairman of the Council, and shall prescribe rules for the conduct of its business.

1-503. The Secretary shall make available necessary office space and furnish the Council necessary equipment, supplies, and staff services, and shall perform such functions with respect to the Council as may be required by the Federal Advisory Committee Act, as amended (5 U.S.C. App. I).

1-6. *General Services Administration.*

1-601. Within six months of the effective date of this order the Secretary of Labor and the Administrator of the General Services Administration shall initiate a study of conflicts that may exist in their standards and other requirements affecting Federal employee safety and health, and shall establish a procedure for resolving conflicting standards for space leased by the General Services Administration.

1-602. In order to assist the agencies in carrying out their duties under Section 19 of the Act and this order the Administrator shall:
(a) Upon request, require personnel of the General Services Administration to accompany the Secretary or an agency head on any inspection or investigation conducted pursuant to this order of a facility subject to the authority of the General Services Administration.
(b) Assure prompt attention to reports from agencies of unsafe or unhealthy conditions of facilities subject to the authority of the General Services Administration; where abatement cannot be promptly effected, submit to the agency head a timetable for action to correct the conditions; and give priority in the allocation of resources available to the Administrator for prompt abatement of the conditions.
(c) Procure and provide safe supplies, devices, and equipment, and establish and maintain a product safety program for those supplies, devices, equipment and services furnished to agencies, including the issuance of Material Safety Data Sheets when hazardous substances are furnished them.

1-7. *General Provisions.*

1-701. Employees shall be authorized official time to participate in the activities provided for by this order.

1-702. Nothing in this order shall be construed to impair or alter the powers and duties of the Secretary or heads of other Federal agencies pursuant to Section 19 of the Occupational Safety and Health Act of 1970, Chapter 71 of Title 5 of the United States Code, Sections 7901, 7902, and 7903 of Title 5 of the United States Code, nor shall it be construed to alter any other provisions of law or Executive Order providing for collective bargaining agreements and related procedures, or affect the responsibilities of the Director of Central Intelligence to protect intelligence sources and methods (50 U.S.C. 403(d)(3)).

1-703. Executive Order No. 11807 of September 28, 1974, is revoked.

1-704. This Order is effective October 1, 1980.

[Sec. 1-704 amended by Executive Order 12223 of June 30, 1980, 45 FR 45235, 3 CFR, 1980 Comp., p. 268]

Editorial note: The Federal Advisory Council on Occupational Safety and Health was continued until Sept. 30, 1989, by Executive Order 12610 of Sept. 30, 1987, 52 FR 36901, 3 CFR, 1987 Comp., p. 250. Executive Order 12610 also provides that, notwithstanding the provisions of any other Executive order, the functions of the President under the Federal Advisory Committee Act which are applicable to the Council, except that of reporting annually to Congress, shall be performed by the Secretary of Labor in accordance with guidelines and procedures established by the Administrator of General Services.

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days for other conditions. Assure the right to anonymity of those making the reports.
(i) Assure that employee representatives accompany inspections of agency workplaces.
(j) Operate an occupational safety and health management information system, which shall include the maintenance of such records as the Secretary may require.
(k) Provide safety and health training for supervisory employees, employees responsible for conducting occupational safety and health inspections, all members of occupational safety and health committees where established, and other employees.
(*l*) Submit to the Secretary an annual report on the agency occupational safety and health program that includes information the Secretary prescribes.

1-3. *Occupational Safety and Health Committees.*

1-301. Agency heads may establish occupational safety and health committees. If committees are established, they shall be established at both the national level and, for agencies with field or regional offices, other appropriate levels. The committees shall be composed of representatives of management and an equal number of nonmanagement employees or their representatives. Where there are exclusive bargaining representatives for employees at the national or other level in an agency, such representatives shall select the appropriate nonmanagement members of the committee.

1-302. The committees shall, except where prohibited by law,
(a) Have access to agency information relevant to their duties, including information on the nature and hazardousness of substances in agency workplaces.
(b) Monitor performance, including agency inspections, of the agency safety and health programs at the level they are established.
(c) Consult and advise the agency on the operation of the program.

1-303. A Committee may request the Secretary of Labor to conduct an evaluation or inspection pursuant to this order if half of a Committee is not substantially satisfied with an agency's response to a report of hazardous working conditions.

1-4. *Department of Labor.*

1-401. The Secretary of Labor shall:
(a) Provide leadership and guidance to the heads of agencies to assist them with their occupational safety and health responsibilities.
(b) Maintain liaison with the Office of Management and Budget in matters relating to this order and coordinate the activities of the Department with those of other agencies that have responsibilities or functions related to Federal employee safety and health, including the Office of Personnel Management, the Department of Health and Human Services, and the General Services Administration.
(c) Issue, subject to the approval of the Director of the Office of Management and Budget, and in consultation with the Federal Advisory Council on Occupational Safety and Health, a set of basic program elements. The program elements shall help agency heads establish occupational safety and health committees and operate effective occupational safety and health programs, and shall provide flexibility to each agency head to implement a program consistent with its mission, size and organization. Upon request of an agency head, and after consultation with the Federal Advisory Council on Occupational Safety and Health, the Secretary may approve alternate program elements.
(d) Prescribe recordkeeping and reporting requirements.
(e) Assist agencies by providing training materials, and by conducting training programs upon request and with reimbursement.
(f) Facilitate the exchange of ideas and information throughout the government about occupational safety and health.

(g) Provide technical services to agencies upon request, where the Secretary deems necessary, and with reimbursement. These services may include studies of accidents, causes of injury and illness, identification of unsafe and unhealthful working conditions, and means to abate hazards.
(h) Evaluate the occupational safety and health programs of agencies and promptly submit reports to the agency heads. The evaluations shall be conducted through such scheduled headquarters or field reviews, studies or inspections as the Secretary deems necessary, at least annually for the larger or more hazardous agencies or operations, and as the Secretary deems appropriate for the smaller or less hazardous agencies.
(i) Conduct unannounced inspections of agency workplaces when the Secretary determines necessary if an agency does not have occupational safety and health committees; or in response to reports of unsafe or unhealthful working conditions, upon request of occupational safety and health committees under Section 1-3; or, in the case of a report of an imminent danger, when such a committee has not responded to an employee who has alleged to it that the agency has not adequately responded to a report as required in 1-201(h). When the Secretary or his designee performs an inspection and discovers unsafe or unhealthy conditions, a violation of any provisions of this order, or any safety or health standards adopted by an agency pursuant to this order, or any program element approved by the Secretary, he shall promptly issue a report to the head of the agency and to the appropriate occupational safety and health committee, if any. The report shall describe the nature of the findings and may make recommendations for correcting the violation.
(j) Submit to the President each year a summary report of the status of the occupational safety and health of Federal employees, and, together with agency responses, evaluations of individual agency progress and problems in correcting unsafe and unhealthful working conditions, and recommendations for improving their performance.
(k) Submit to the President unresolved disagreements between the Secretary and agency heads, with recommendations.
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(a) Upon request, require personnel of the General Services Administration to accompany the Secretary or an agency head on any inspection or investigation conducted pursuant to this order of a facility subject to the authority of the General Services Administration.
(b) Assure prompt attention to reports from agencies of unsafe or unhealthy conditions of facilities subject to the authority of the General Services Administration; where abatement cannot be promptly effected, submit to the agency head a timetable for action to correct the conditions; and give priority in the allocation of resources available to the Administrator for prompt abatement of the conditions.
(c) Procure and provide safe supplies, devices, and equipment, and establish and maintain a product safety program for those supplies, devices, equipment and services furnished to agencies, including the issuance of Material Safety Data Sheets when hazardous substances are furnished them.

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Department of the Interior
Departmental Manual

Effective Date: June 22, 2011
Series: Safety Management
Part 485: Safety and Occupational Health Program
Chapter 5: Program Evaluations

Originating Office: Office of Occupational Safety and Health

485 DM 5

5.1 **Purpose**. This chapter specifies the minimum requirement for the conduct of safety and occupational health program (Program) evaluations by the Department of the Interior's (Department) bureaus and offices. The Department is required by 29 CFR 1960.78 to develop and implement a program for evaluating the effectiveness of its bureau and office Programs. The Departmental Designated Agency Safety and Health Official (DASHO), through the bureau or office DASHOs, will conduct evaluations that include assessments of the extent to which the program conforms to the requirements of Executive Order 12196, 29 CFR Part 1960, industry practice, and this chapter.

5.2 **Scope**. The policy in this chapter applies to all bureaus and offices in the Department.

5.3 **Authorities**.

A. Public Law 91-596, "Occupational Safety and Health Act of 1970," (The Act) Section 19.

B. Executive Order 12196, "Occupational Safety and Health Programs for Federal Employees."

C. Title 29, Code of Federal Regulations (CFR) Part 1960, Subpart J, Evaluation of Federal Occupational Safety and Health Programs.

5.4 **Reference**. American National Standards Institute/American Industrial Hygiene Association; Z10; Occupational Health and Safety Management Systems.

5.5 **Responsibilities**.

A. Departmental Designated Agency Safety and Health Official (DASHO) is responsible for:

(1) Ensuring satisfactory completion of the safety and health program evaluation on a three year basis;

(2) Providing the staff support and resources necessary for the successful completion of the evaluation process.

B. Director, Office of Occupational Safety and Health (OSH), is responsible for:

(1) Providing leadership to develop a standardized evaluation of bureau and office occupational health and safety programs;

(2) Collaborating with bureaus and offices to develop standardized evaluation program and field tools;

(3) Working with bureaus and offices to set standards for bureau and office evaluations;

(4) Providing the results of reviews to bureau and office senior leadership;

(5) Coordinating the report writing with the bureaus and offices; and

(6) Testing and auditing bureau progress.

C. Heads of Bureaus are responsible for:

(1) Providing bureau and regional safety and health program oversight of all organizations within their respective geographical boundaries to ensure that an effective safety and health program is in place for the identification, evaluation, and control of occupational safety and health hazards.

(2) Periodically evaluating the safety and health program implementation in regions and other subordinate offices.

(3) Providing staff assistance to the evaluation program effort coordinated by the OSH.

(4) Timely providing information requested by evaluation teams.

D. Heads of Offices are responsible for:

(1) Providing safety and health program oversight of all organizations within their Office to ensure that an effective safety and health program is in place for the identification, evaluation, and control of occupational safety and health hazards.

(2) Providing guidance and assistance to line managers and supervisors for compliance with safety and health program implementation requirements;

(3) Providing staff assistance to the evaluation program effort coordinated by the OSH; and

(4) Timely providing information requested by evaluation teams.

5.6 **Requirements**.

A. The OSH will coordinate, with assistance from the bureaus and offices, program evaluations of the bureau and office safety and health programs. These evaluations will be focused at the headquarters level, and as necessary and appropriate, at field locations agreed upon by the bureau or office and concurred with by OSH. The evaluation cycle will be three (3) years.

B. Each bureau or office will also conduct internal Program evaluations of each of their regions at least once every three (3) years. To minimize disruption in field offices, these evaluations should be coordinated with the annual Occupational Safety and Health Administration (OSHA) mandated compliance inspections (485 DM 6) whenever possible.

C. Program evaluations conducted within the regions will include visits to field operations and activities, plus interviews and a closing conference with the regional and/or field level senior staff as applicable. During the closing conference, evaluation findings and recommendations will be presented.

D. The OSH will coordinate the conduct of evaluations with bureaus and offices following the Departmental *Safety and Occupational Health Program Evaluation Handbook*, which includes:

(1) Pre-evaluation checklist.

(2) Scheduling letter.

(3) Advance information request.

(4) In-brief.

(5) Evaluation tool (checklist).

(6) Interview guidelines.

(7) Evaluation guidance.
- Site selection criteria.
- Training.
- Reference manual.

(8) Out-brief.

(9) Report.

(10) Close-out.

(11) Customer service questionnaire.

E. The bureau/office evaluation report will be prepared and transmitted to the head of the evaluated bureau/office by the Director, OSH, through the DASHO. The report will identify program strengths and, where appropriate, identify Program weaknesses and provide suggestions for Program enhancements. The report should be disseminated by the bureau to all affected subunits.

F. An annual report must be submitted to the Assistant Secretary of Labor for OSHA, describing the overall effectiveness of the Department's Program. The annual report will reference evaluations conducted by OSH during the year as well as internal program evaluations conducted by the bureaus or offices. The bureau/office reports will be forwarded, along with other pertinent information, in a timely manner to the OSH to be collated into one report for OSHA.

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, *Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters*; Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*; and Department of the Interior 485 DM, *Safety and Occupational Health Program*.

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.

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

(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.

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

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.

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;

(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.

(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

Reclamation Manual

Directives and Standards

Subject: Facility Safety Inspection and Abatement

Purpose: To specify the minimum Occupational Safety and Health Program (Program) requirements for conducting safety and health inspections of facilities and timely abatement of identified hazards for all Reclamation facilities and worksites. The benefits of this Directive and Standard (D&S) is to standardize Reclamation's facility safety inspection and abatement tracking processes and assure compliance with the Department of the Interior's requirements for facility safety inspections.

Authority: 5 U.S.C. 7902, Public Law 91-596, Executive Order 12196, 29 CFR 1960, OMB Circular A-123, Occupational Safety and Health Act of 1970, 29 U.S.C. 651 et. Seq., Department of the Interior Safety and Health Manual, 485 DM Chapter 6; Reclamation Safety and Health Standards Section 2.1; and Reclamation Manual SAF 01-01.

Approving Official: Director, Security, Safety, and Law Enforcement

Contact: Safety and Occupational Health Office, 84-43000

1. **Introduction.** This D&S standardizes the procedures and responsibilities for Reclamation's facility safety inspection and abatement program. Reclamation's management is responsible for establishing and maintaining a safe and healthful environment for employees, volunteers, and visitors. To achieve this goal, Reclamation must assess its safety and occupational health program and ensure that adequate and reliable policies, procedures, and systems are implemented to track and promptly correct identified safety and occupational health deficiencies.

2. **Applicability.** This D&S applies to all Reclamation employees who conduct or participate in facility safety inspections and those responsible for abatement.

3. **Definitions.** See Appendix D for a list of acronyms and definitions.

4. **Responsibilities.**

   A. **Commissioner/Designated Agency Safety and Health Official.**

      (1) Provides the Secretary of the Interior with reasonable assurance that Reclamation is in compliance with applicable laws and regulations included in the Federal Managers Financial Integrity Act (FMFIA), that Reclamation facility inspections are conducted annually in accordance with the provisions of this D&S, and that facilities are operating

effectively with no weaknesses in the design or operation of internal controls.

(2) Provides personnel and financial resources, as needed, to address abatement of findings and facilitate successful completion of the inspection process inclusive of continuous compliance improvement from year-to-year.

B. **Regional Directors.**

(1) Provide the Commissioner with reasonable assurance that Reclamation facilities in their region are in compliance with applicable laws and regulations included in FMFIA, that facility inspections are conducted annually in accordance with the provisions of this D&S, and that facilities are operating effectively with no material weaknesses in the design or operation of internal controls.

(2) Provide personnel and financial resources, as needed, to address abatement of findings and facilitate successful completion of the inspection process inclusive of continuous compliance improvement from year-to-year within their region.

C. **Bureau Occupational Safety and Health Program Manager.**

(1) Provides Reclamation safety and health inspection oversight to ensure that an effective process is in place for the identification, evaluation, and control of occupational safety and health hazards, where applicable.

(2) Monitors inspections to ensure all facilities are inspected at least once each fiscal year.

(3) Develops and maintains the Facility Safety Inspection module of the Dam Safety Information System (DSIS) to meet finding/deficiency tracking and abatement requirements for annual action plans, program evaluations, and compliance inspections as required by Reclamation Manual D&S, *Occupational Safety and Health - General* (SAF 01-01).

(4) Develops and incorporates standardized inspection checklist templates as a guide for regional and field use in meeting inspection requirements. A sample template of a Safety Inspection checklist can be found in Appendix B.

(5) Develops DSIS reports for Reclamation, regional, and local tracking of unabated inspection deficiencies and management review for appropriateness and timeliness of corrective actions.

(6) Provides the Reclamation Leadership Team (RLT) with an annual summary of Reclamation inspection findings and deficiencies via integration into Reclamation's Annual Assurance Statement, as appropriate.

D. **Regional Safety Managers.**

(1) Provide region-wide safety and health program inspection oversight of all organizations within their respective geographical boundaries to ensure that an effective process is in place for the identification, evaluation, and control of occupational safety and health hazards.

(2) Monitor inspections in DSIS to ensure that all facilities within their geographic area of responsibility are inspected annually, and follow up as appropriate for timely closure of deficiencies and/or updated status reports.

(3) Coordinate with Area Offices in their region, and provide support for high-risk facilities. Regional Safety Managers will identify these facilities based on high-risk activities, high-rate accident statistics, occupational hazards, past Program history, personnel turnover, amount of time since last formal review, etc.

(4) Provide guidance and assistance to Area Office safety staff, managers and supervisors to comply with safety and health program inspection requirements.

(5) Review DSIS abatement logs and associated reports, and communicate information to respective regional management, as needed, to ensure appropriateness and timeliness of corrective actions.

(6) Support Reclamation regional and local safety and health staff, e.g., regional safety officers and collateral duty safety representatives, through training that incorporates the inspection process and provides subject personnel with the ability to recognize safety and health hazards through the conduct of workplace inspections.

(7) Advise Regional Directors on the regional safety assurance statement, as appropriate.

(8) Support abatement recommendations from safety and health staff that include control methods in the following order of preference: elimination, substitution, engineering controls, warnings, administrative controls and personal protective equipment.

E. **Area Office Managers.**

(1) Provide their regional director with reasonable assurance that Reclamation facilities within their area are in compliance with applicable laws and regulations included in the FMFIA, that facility inspections are conducted annually in accordance with the provisions of this D&S, and that facilities are operating effectively with no material weaknesses in the design or operation of internal controls.

(2) Provide personnel and financial resources, as needed, to address abatement of findings and facilitate successful completion of the inspection process inclusive of continuous compliance improvement from year-to-year within their area.

F. **Area Office Safety and Health Managers/Specialists.**

(1) Establish a workplace inspection program to effectively document and track safety and health deficiencies until corrective action is taken either to eliminate or reduce the hazard to an acceptable level. High-hazard workplaces or facilities where there is an increased risk of accident or injury due to the nature of the operations must be surveyed more frequently.

(2) Conduct annual safety and health compliance inspections for facilities, document deficiencies within DSIS, and coordinate with respective management to close all findings.

(3) Coordinate the conduct of annual local field-level safety and health compliance self-inspections to include all subordinate field locations with supervisors, managers, and other collateral duty staff, e.g., local firearms and watercraft instructors and chemical hygiene officers.

(4) Coordinate the documentation of local field-level facility inspections findings and associated corrective actions in DSIS, as appropriate, following up on local abatement logs to ensure that corrective actions are documented and/or status reports updated within DSIS every 90 days until full abatement has been completed.

(5) Support local safety and health staff, e.g., collateral duty safety representatives and safety committees, through DSIS and Occupational Safety and Health Administration (OSHA) training that incorporates the inspection process and provides them with the ability to recognize safety and health hazards through the conduct of workplace inspections.

(6) Seek assistance from the regional safety and health staff when complex or difficult abatement measures are necessary.

G. **Collateral Duty Safety Representatives and Safety Committee Members.** Assist area office safety and health managers with facility safety inspections as needed. Collateral duty safety representatives and safety committee members assisting in or conducting safety inspections will have training in hazard recognition and work place safety standards.

H. **Facility Managers/Supervisors/Staff.**

(1) Conduct daily inspections of the workplaces and operations within their area of responsibility.

(2) Respond to deficiencies identified during inspections.

(3) Follow up on corrective actions to ensure satisfactory completion.

(4) Provide coordination, assistance and cooperation necessary to support all safety inspections.

5. **Requirements.**

A. Reclamation will conduct and document inspections of all occupied workplaces and all reserved facilities under its control for safety and health compliance as required by 29 CFR 1960 Subpart D and this chapter. Contractor operations and facilities where operations and management have been transferred to a third party are not subject to this D&S. More frequent inspections will be conducted when there is increased risk of accidents or incidents. Reclamation's Program includes the following types of inspection activities:

(1) Day-to-Day Inspections. Supervisors must ensure that conditions in the workplace are monitored daily to prevent injuries, occupational illnesses, and property damage accidents.

(2) Annual Inspections. All occupied workplaces and all reserved facilities under Reclamation's control must be inspected at least annually. Regions and area offices will document this activity as required in Paragraph 5.C (11) of this D&S.

(3) Unannounced Inspections. Sufficient unannounced inspections shall be conducted to ensure the identification and abatement of hazardous conditions.

B. Annual inspections will be conducted by persons who are trained in hazard recognition and safety and health inspection procedures. Safety and health specialists, as defined in 29 CFR 1960.2(s), with experience and/or up-to-date training in occupational safety and health hazard recognition and evaluation, meet the qualifications of safety and health inspectors. For those working environments where there are less complex hazards, employees who do not possess all of these safety and health specializations may be used. However, inspectors, such as collateral duty safety representatives, safety committees, or facility managers, will have sufficient documented training and/or experience in the safety and health hazards of the workplace involved to recognize and evaluate those particular hazards and to suggest effective abatement procedures.

C. Persons conducting annual safety and health inspections must:

(1) Use OSHA, DOI, and Reclamation standards to measure compliance.

(2) Have the necessary equipment, such as sound level meters, air monitors, and personal protective equipment to conduct the inspection.

(3) Examine accident records and previous inspection reports as appropriate.

(4) Hold an opening conference with the facility manager. In cases where a single workplace is expected to undergo multiple inspections over a period of time, this meeting need only take place once. An employee representative should be invited to participate in all stages of an inspection, including the opening and closing conferences.

(5) Consult with employees on matters of safety and health as appropriate.

(6) Ensure that employees exposed to imminently dangerous conditions are immediately removed from harm or that immediate corrective actions are implemented.

(7) Comply with safety rules and practices.

(8) Take or obtain photographs, where appropriate.

(9) Avoid unreasonable disruption of the operation.

(10) Record deficiencies which can be abated in 30 days or less in an inspection log and verify they are abated within that time frame.

(11) Hold a closing conference with management to disclose the findings of the inspection and recommend abatement measures. The management and employee representative(s) will be afforded an opportunity to bring other

information to the attention of the inspector regarding unsafe or unhealthful conditions in the workplace. In cases where a single workplace is expected to undergo multiple inspections over a period of time, this closing conference need only take place once.

(12) Assign a Risk Assessment Code (RAC) to each hazard to assist management with prioritization of resources to abate the most critical hazardous deficiencies. The RAC assigned to each hazard is an expression of risk, combining the severity and the probability of occurrence. The RAC criteria and definitions are detailed in mandatory Appendix A.

(13) Document the inspection and recordable safety deficiencies in DSIS.

D. If an imminent danger condition (RAC-1 or RAC-2) is identified at any time, the management official in charge will initiate corrective/protective action immediately and, if necessary, stop the operation and/or prevent access to the area, except for those needed to abate the condition.

E. If an imminent danger condition (RAC-1 or RAC-2) is identified during an inspection, a written "Notice of Unsafe or Unhealthful Condition" (Notice) will be transmitted by the inspector to the site supervisor and immediately posted conspicuously at or near each place a hazardous working condition exists, if practical, until the condition is abated or for three working days, whichever is longer. If not practical, the Notice will be posted where it is readily observable by all affected employees. A copy of the Notice, and instructions on filling it out, can be found in Appendix C.

F. Recordable safety deficiencies include:

(1) All RAC-1 and RAC-2 deficiencies regardless of timeframe necessary for abatement.

(2) All deficiencies requiring 30 or more days to abate.

G. Deficiencies that will be corrected in less than 30 days may be entered in DSIS at the discretion of the inspector.

H. Deficiencies entered into DSIS will contain the following minimum information and be provided to management and employee representative(s) participating in the inspection:

(1) Identification of the location of the hazard that has or poses a safety deficiency. Where possible, include the Real Property Unique Identifier (RPUID).

(2) Description of the nature and extent of the hazard.

(3) Reference to applicable safety or health standards.

(4) Establishment of a reasonable time for abatement of the hazard (it is expected that most hazards can be abated within 90 days).

(5) Risk Assessment Codes (RAC). The RAC criteria and definitions are detailed in mandatory Appendix A.

For inspections without recordable deficiencies, a record of inspection will still be created within DSIS. This record will include at a minimum the name of the facility, the date of the inspection, and the name of the inspector.

I. Abatement of Inspection Findings. Document the status of abatements within DSIS every 90 days until all inspection findings are abated.

J. Management will be responsible for quarterly review of all their open inspection findings within their DSIS abatement log.

K. If abatement of a hazardous condition is not within the authority and resources of the organization, local management will:

(1) inform and protect potentially affected employees;

(2) inform and request assistance from the next higher management level in the organization and their respective safety staff; and

(3) coordinate, when necessary, with the Federal lessor agency if applicable, e.g., GSA, to secure abatement as specified in 29 CFR Part 1960, Subpart E, and 41 CFR Parts 101-21.

L. OSHA, Environmental Protection Agency (EPA), State Department of Health, Department of the Interior, and Reclamation safety and health professionals will have right of entry without delay, at reasonable times, to any facility, construction site, or other workplace to perform an inspection. They will also have the right to inspect any item or place within the facility and to question, privately, any employee, manager, supervisor, visitor, contractor, or concessioner associated with the facility (see 29 CFR 1960.31).

(1) If an inspector from OSHA arrives to conduct an inspection of a Reclamation facility, the facility manager will be notified immediately and will ensure that a knowledgeable person accompanies the OSHA inspector. The manager or their representative will notify the respective regional safety manager. Facility-related OSHA inspection findings,

recommendations, and abatement actions will be documented within DSIS.

Risk Assessment System (RAS) Risk Assessment Codes (RACs) Matrix

RAC levels are identified by a numerical scale 1-5, with RAC-1 being the most critical requiring immediate response and RAC-5 being the least critical. RACs are annotated by the RAC Number, followed by the Frequency and Severity. Examples of RAC annotations are 1(A)(I) for a RAC 1 that has Catastrophic consequences and a Immediate Danger Frequency A 4(IV)(B) would be a low level risk, with minor severity and with a likely probability.

RAC-1 (Critical) represents an immediate danger to life, health or infrastructure and requires emergency correction or hazard controlled to a lower level of risk.

RAC-2 (Serious) represents a high level of threat to life, health or infrastructure and requires hazard correction or hazard controlled to a lower level of risk as soon as possible.

RAC-3 (Moderate) represents a medium level risk to life, health or infrastructure, with correction planned and completed, or hazard controlled to a lower level of risk.

RAC-4 (Minor) represents a low level risk, with correction planned and completed, or hazard controlled to a lower level of risk.

RAC-5 (Negligible) represents the lowest level risk and is considered minor. The correction of these risks can be planned in the out-years.

Probability Code **Severity Code**	**Frequent (A)** Immediate danger to health and safety of public, staff, or property and resources; occurs frequently or continuously.	**Likely (B)** Probably will occur in time if not corrected, or probably will occur one or more times during the life of the system.	**Occasional (C)** Possible to occur in time if not corrected.	**Rarely (D)** Unlikely to occur; may assume exposure will not occur.
Catastrophic (I) Immediate and imminent danger of death or permanent disability, chronic or irreversible illness, major property or resource damage.	**RAC 1**	**RAC 1**	**RAC 2**	**RAC 3**
Critical (II) Permanent partial disability, temporary total disability greater than 3 months, significant property or resource damage.	**RAC 1**	**RAC 2**	**RAC 3**	**RAC 4**
Significant (III) Hospitalized minor injury, reversible illness, period of disability 3 months or less, loss or restricted workday accident, compensable injury illness, minor property or resource damage.	**RAC 2**	**RAC 3**	**RAC 4**	**RAC 5**
Minor (IV) First aid or minor medical treatment. Presents minimal threat to human safety and health, property or resources, but is still in violation of a standard.	**RAC 3**	**RAC 4**	**RAC 5**	**RAC 5**

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Sample Inspection Checklist

1. **Administrative Area Inspection Criteria.**

A. **Housekeeping.**

(1) Materials are not stored on top of the flipper door units. Materials are neatly organized and stored on shelves underneath work areas and away from electrical outlets, power strips, portable heaters, or other devices that are energized. Materials and equipment are not stored in exit stairwells.

(2) Power and computer cords are secured and do not present a tripping hazard.

(3) Debris and excess materials are not stored in the work place cubicle or outside in the exit passage way.

(4) Excess computer and system furniture are not stored in the cubicle.

(5) Plants are stored on a plant shelf or stable open book shelf. Plants are <u>not</u> stored on top of flipper door units, meridian files, any outside wall ventilation surface, or within 3 feet of electrical equipment or components.

(6) Plants are in containers that are not susceptible to growing mold, do not promote insect life; and will not leak/drip on furniture, filing cabinets, vents, or shelving.

(7) Portable fans are stored on a fan stand when elevated (not on flipper door units or other unstable locations).

(8) Books and other materials are stable and organized when stored on book shelves or horizontal working surfaces.

B. Emergency Egress.

(1) Exit passage ways from employee cubicles are not restricted or blocked with debris and other materials. Cubicle entrances are maintained at 33 inches and aisle ways will be 44 inches.

(2) Emergency exit signs are illuminated.

(3) Emergency exit signs can be seen from two directions, directs occupants to an emergency exit location.

(4) Employees are trained on the Occupant Emergency Plan (OEP).

(5) Exit maps and plans are posted in a highly visible area, and are large enough to be easily read.

(6) Occupied work areas are equipped with audio and video alarms.

(7) Emergency lighting is present in each occupied work area, along the common paths of travel and at the discharge to the exit.

C. Fire Safety.

(1) Small appliances (e.g. coffee pots, individual cup warmers, etc…) are plugged directly into outlets. All coffee pots, microwave ovens, and cup heaters are located in the break areas. There will be no cup warmers at desks.

(2) Small appliances are placed atop a non-combustible surface when in use.

(3) Asbestos-containing materials are clearly labeled and not used as a non-combustible surface.

(4) Extension cords are not for employed for everyday use. Computers are either plugged directly into outlets, or to power strips equipped with a circuit breaker.

(5) Portable heaters have automatic shut-off (with tip-over protection). Old heaters must be replaced with new approved ones.

(6) Minimum 18'' from charged sprinkler line head to combustible surfaces.

(7) Power strips, extension cords, and other portable electrical devices are in good repair and not damaged.

(8) Combustible materials are not stacked/piled on top of electrical cords or heat producing equipment such as computers, printers, water heaters, furnaces, and lights.

(9) Portable electrical appliances are approved (UL and FM listed).

(10) Fire extinguishers are properly mounted and placarded and those expected to operate extinguisher are trained annually.

(11) Fire extinguishers are inspected monthly and the inspection annotated on an inspection tag or inspection log. (Note: fire extinguishers must be serviced annually by a fire extinguisher service company).

(12) Personnel serving as floor monitors are up-to-date on OEP training, use of evacuation chairs, and fire evacuation routes.

D. Automatic External Defibrillators (AED)/First Aid Kits. AEDs and first aid kits are placarded and properly stocked with supplies.

E. General Safety.

(1) Office furnishings are in good repair and do not pose a tripping hazard (e.g., carpet in good repair).

(2) Cords and other materials stretched across the floor are properly covered to prevent damage or tripping hazards.

(3) Employees are aware of the Collateral Duty Safety Representative (CDSR) for their group or floor.

(4) Emergency telephone number stickers are attached to employee telephones, or are posted in a visible location within the employee's workspace.

(5) Employees renting cars for government travel or using government vehicles are current on Defensive Driving training.

2. **Laboratory Area Inspection Criteria.**

A. Chemicals.

(1) Chemicals used and stored in the lab are stored according to hazard class and type. All acids are stored together, all bases stored together, all oxidizers stored together, etc.

(2) Chemicals are correctly labeled, identifying contents.

(3) Materials Safety Data Sheets (MSDS) are available, readily accessible to employees, and in close proximity to the chemicals.

(4) Flammable chemicals are stored in a fire-resistant storage cabinet. Combustible chemicals are stored appropriately, usually in a flammable materials storage cabinet or in a separate combustible materials storage cabinet.

(5) Tops of storage cabinets (e.g. flammable materials, combustible materials, chemical, etc.) are kept clear of any debris or excess material.

(6) Storage cabinets are marked with the correct National Fire Protection Association diamond placard.

(7) Only daily use quantities of a chemical are outside of a storage cabinet or hood.

(8) Written Chemical Hygiene Plan which includes chemical Job Hazard Analysis (procedures) is briefed and followed. For example, mixing or transferring low vapor pressure chemicals is done inside a lab hood to prevent vapor/gas from escaping into the general lab area.

(9) A Chemical Hygiene Officer is designated in writing and responsible for overall laboratory safety program.

(10) All laboratory personnel are trained to the Chemical Hygiene Plan.

(11) Primary and, where applicable, secondary containment is structurally sound (no leaks to the outside environment) and applicable to the chemical stored (plastic containers for acids).

(12) Laboratory hood sash heights are in the correct position, an annual inspection performed, and inspection sticker with face velocity noted is on the hood.

(13) Appropriate spill kits are available in the workplace, and employees have been properly trained on their use.

(14) Excess chemical product is removed and properly disposed.

(15) Do not store combustible materials or cleaning chemicals in furnace or water heater rooms.

B. Cylinders.

(1) Cylinder content must be clearly identified and labeled.

(2) Cylinder must be secured at all times, stored upright, and protected from damage.

(3) Cylinder is equipped with the correct regulator, and no grease, oil, or solvent was used to connect the regulator to the cylinder.

(4) If cylinder is not in use and regulator not attached, protection cap is in place and hand tight.

(5) Oxygen cylinders are separated from flammable gas cylinders by at least 20 feet or a 30 minute firewall. The exception is acetylene or other flammable welding carts which contain both a flammable cylinder and an oxygen cylinder.

(6) Acetylene cylinders must be turned off after each use, and the regulator operating pressure must not exceed 15 psi.

(7) Warning, Caution, Danger, and No Smoking signs applicable to the compressed gas cylinder are posted.

(8) Ensure acetylene torches are fitted with backflow preventers or check valves.

C. Emergency Eye Wash Stations and Showers.

(1) Immediately available and maintained where corrosive materials are stored and used.

(2) Emergency eye wash and showers are operated and inspected monthly and annotated on an inspection tag. Water temperature is tempered.

(3) Emergency eye wash and shower locations are not obstructed or blocked.

(4) Emergency eye wash and shower stations are properly identified and placarded. Bottles of eyewash do not meet the 15 minute flushing requirement.

D. PPE.

(1) Safety glasses and other PPE must be made available to lab personnel, together with appropriate training on the use of PPE.

(2) PPE is provided to visitors and other guests.

(3) PPE must be inspected and defective/outdated PPE will be removed and discarded, as needed (e.g. gloves, safety goggles, etc.).

E. Electrical Safety.

(1) All electrical wire and wiring connections are in conduit, or, insulated and inaccessible through hard wall construction techniques.

(2) All electrical panels are labeled, and marked with "Danger" signs. Covers are in place.

(3) All circuit breakers are labeled inside the panel.

(4) Electrical panels are unobstructed with a minimum of 30 inches wide and 36 inches deep working space in front of the panel.

(5) No debris or excess material sits on top of electrical panels or conduit.

(6) Electrical connections around water supplies that can lead to a ground path are wired as a GFCI (ground fault circuit interrupt) circuit. The general rule of thumb is any electrical work within 6 feet of a water source must be GFCI.

(7) A Lockout Tagout written program must be in place, briefed, followed, and PPE worn when accessing or modifying electrical panels/circuits.

F. Workshops.

(1) All machine and pulley guards are in place and operational.

(2) Equipment so required have dead-man switches that are operational.

(3) Electrical cords to powered hand tools are in good condition without fraying/exposed insulation/wiring, and have three prong or polarized plugs. Tools without a ground prong must be double-insulated.

(4) Area must be evaluated for noise exposure and, where applicable, posted for high noise exposure and hearing protection must be available and worn.

(5) Workspace organized and only the tools in use are in the work area.

(6) Floors are not cluttered, clean of wood/metal shavings, oil/solvents/varnish spills cleaned up to prevent slip/trip/fall hazards.

(7) Overhead fluorescent lights are protected with covers.

(8) Platform storage areas have toe kicks, 42-inch tall railings with mid-rail, and are posted with load rating. Load ratings (performed by the manufacturer or a professional engineer) are not exceeded by stored materials.

(9) Shelving storage racks are posted with load ratings and secured to prevent tipping. Load ratings are not exceeded by stored materials.

(10) Materials stored on platform storage areas or metal shelving must be stacked/secured to prevent falling hazard to personnel walking below.

(11) Powered freestanding equipment must be secured to prevent tipping (e.g. drill press bolted to the floor).

RECLAMATION REPORT OF UNSAFE OR UNHEALTHFUL CONDITION

HAZARD DESCRIPTION

DATE:_____ LOCATION:_____ ROOM NUMBER:_____

HAZARD DESCRIPTION:

RISK EVAL. (MARK ONE): RAC 1 2

ABATEMENT ACTIONS AND PROJECTED COMPLETION DATE:

INSPECTOR:_____ PHONE:_____ ORG:_____

SUPERVISOR IN CHARGE OF WORKPLACE:_____ PHONE:_____ ORG:_____

* *Note: Any questions, please contact your Collateral Duty Safety Representative.*

Instructions for Filling out Report of Unsafe Conditions

Date: Enter the date the hazardous condition was found.

Location: Enter the building and area where the hazardous condition exists.

Room number: Enter the room number or nearest identifiable room number.

Hazard Description: Enter the act, condition, and/or practice observed. Give as much detail as possible. Name people to contact for further information who may have observed the hazard, or who committed the unsafe act.

Risk Evaluation: Assign a Risk Assessment Code (RAC). A RAC-1 (Critical) represents an immediate danger to life, health or infrastructure and requires emergency correction or hazard controlled to a lower level of risk. A RAC-2 (Serious) represents a high level of threat to life, health or infrastructure and requires hazard correction or hazard controlled to a lower level of risk as soon as possible.

Abatement Actions and Proposed Completion Date: The supervisor will enter the planned actions to abate the hazardous condition, as well as a proposed completion date.

Inspector: Enter the name of the inspector.

Supervisor in Charge of Workplace: Enter the name of the supervisor in charge of the workplace where the hazardous condition exists.

Phone: Enter a telephone number where you can be contacted for further information, to discuss the report or to provide status reports on abatement actions.

Organization Code: Enter your Mail Stop and office code in order to receive written replies.

Once the inspector has completed this form, s/he will make a copy and forward a copy to the area supervisor for action, review, and posting.

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List of Acronyms

AED	Automatic External Defibrillators
CDSR	Collateral Duty Safety Representative
CFR	Code of Federal Regulations
D&S	Directives and Standards
DSIS	Dam Safety Information System
EPA	Environmental Protection Agency
FMFIA	Federal Managers Financial Integrity Act
MSDS	Materials Safety Data Sheets
OEP	Occupant Emergency Plan
OSHA	Occupational Safety and Health Administration
RAC	Risk Assessment Code
RAC-1 (Critical)	Represents an immediate danger to life, health or infrastructure and requires emergency correction or hazard controlled to a lower level of risk.
RAC-2 (Serious)	Represents a high level of threat to life, health or infrastructure and requires hazard correction or hazard controlled to a lower level of risk as soon as possible.
RAC-3 (Moderate)	Represents a medium level risk to life, health or infrastructure, with correction planned and completed, or hazard controlled to a lower level of risk.

RAC-4 (Minor)	Represents a low level risk, with correction planned and completed, or hazard controlled to a lower level of risk.
RAC-5 (Negligible)	Represents the lowest level risk and is considered minor. The correction of these risks can be planned in the out-years.
RLT	Reclamation Leadership Team
RPUID	Real Property Unique Identifier
UL	Underwriter's Laboratories

Appendix C – Survey Results

Timestamp	Username	1. Does your Region, Area Office or Facility have a Regional, Area or Facility office specific safety program in place?	2. If you answered yes to number 1, what reference documents (policies, regulations, etc) are used to guide your program?	3. Does your Region, Area or Facility office Safety program have specific written procedures to perform Safety Hazard Assessments?	4. When the Hazard Assessments are performed, are the identified hazards incorporated into your Regional, Area or Facility policy?	5. Do you have a recurring process in place to train new managers and supervisor on performing and updating Facility Assessments?	6. Do you have a documented process to perform Facility Assessments on a recurring basis?	7. Has a Risk Analysis been performed on the Hazards identified in the facility assessments?	8. Do you have documented procedures in place on the procedures and job instructions necessary to perform work where hazards have been identified in the assessment.	9. When work is being accomplished at your office or facility, do you a process in place to verify the current assessments are accurate and a means to provide feedback if they are not?	10. Explain the process you utilize when you perform safety assessments at your facilities.	11. Are you familiar with the ANSI / AIHA Z10-2005 "Occupational Health and Management Systems"	12. Do you feel that you have the proper resources, ie; qualilfied personnel, support staff, regulations, standards or other health and safety requirements, to adequately perform safety assessments at	13. What is your current position?
8/21/2014 13:08:56	dklein@usbr.gov	Yes	I don't know, its someone elses job	Yes	Various means are maintained for the assessment	yes, I dont know	Yes	I dont know	yes	This is the supervisor / managers duty to monitor all jobs in the facility	I dont know	No	sometimes	Supervisor
8/21/2014 13:17:59	ddeflitch@usbr.gov	Yes	Most reference the Reclamation Safety and Health Standards as a primary, and the sub references of 29 CFR 1910 and 1926	Yes	Various means are maintained for the assessment	unknown	Yes	unknown	Absolutely- extensive use of Position JHA and task based JHAs	While Employees are responsible to review and agree with JHA, anyone may stop work and addess a concern if they are not	Follow the lead of the Area Office Safety Officer	No	If done by the Area Safety Officer, then yes	Field Office Manager
8/21/2014 13:19:18	sparker@usbr.gov	Yes	Reclamation Safety and Health Standards [RSHS]; ANSI Z10; OSHA 29CFR1910 OSHA 29CFR1926	Yes	Various means are maintained for the assessment	No	No	No	JHA's, SOP's, EAP's	No personnel are assigned this specific duty	OSHA RSHS Directive and Standards	Somewhat familiar	Yes	Area Office Safety Manager
8/21/2014 13:36:13	fcortez@usbr.gov	Yes	El Paso Field Division Safety Policy Albuquerque Area Office Safety Policy	Yes	The method is explained in the Safety Program		Yes	Yes	JHA's	A Safety Observer is assigned to large projects	AAO Safety Policy	No	Yes	Special Assistant
8/21/2014 13:48:16	kthiel@usbr.gov	Yes	Reclamation Safety and Health Standards Code of Federal Regulations OHSA Standards ECAO Safety Manual	Yes	Various means are maintained for the assessment	Yes	Unsure	Yes	Yes	A Safety Observer is assigned to large projects	The safety officer inspects facilities with the plant supervisor, makes reports and recommendations, and assists with followup of recommendation completion.	No	Yes	Deputy O & M Chief
8/21/2014 13:52:25	belbrock@usbr.gov	Yes	RSHS, OSHA, FIST 1.1	Yes	Various means are maintained for the assessment	No	Yes	Yes	Yes	No personnel are assigned this specific duty		No	Yes	Facility Manager (one facility)
8/21/2014 14:05:02	krice@usbr.gov	Yes		Yes	Various means are maintained for the assessment		Yes	Yes		This is the supervisor / managers duty to monitor all jobs in the facility		No	Yes for the most part. Reclamation puts too many duties on collateral duty safety representatives.	Facility Manager (several facilities)
8/21/2014 14:20:40	mhamman@usbr.gov	Yes	Reclamation's Safety Policy; UC Region's Safety Policy and plan development directive; Reclamation's Safety and Health Standards; the Albuquerque Area Office Safety Plan	Yes	The method is explained in the Safety Program	Yes, via a training spreadsheet	Yes	In process as a new round of facility assessments was just completed	We have SOPs and JHAs that must be consulted on hazardous tasks and projects	In AAO, we have multiple facilities where some activities are more hazardous than others. Large projects have inspectors/safety observers, smaller projects/jobs have supervisory oversight and small tasks are the performers responsibilty for safety	Regional Safety Policies	I am aware but have not personally received the training. Others in our offices have.	We have a Regional Safety Officer assigned to our office to assist facility managers and CSRs in performing assessments	Area Manager
8/21/2014 14:22:42	fholler@usbr.gov	Unsure		Yes	Various means are maintained for the assessment	no	Yes	No	yes	This is the supervisor / managers duty to monitor all jobs in the facility	Safety Manual & past experience	No	yes	office manager located in a GSA building
8/21/2014 14:33:59	sschelske@usbr.gov	Yes	Reclamation Safety and Health Standards Job Hazard Analysis (JHA) Safety Hazard Assessments are not listed in the Reclamation Safety and Health Standards. I work in an office that only works on rural water projects. That might be the reason I am not familiar with Safety Hazard Assessments. We do a JHA on everything we do. I would appreciate more information on Safety Hazard Assessments if they are needed in addition to a JHA for rural water O&M projects.	Job Hazard Analysis	Various means are maintained for the assessment	No to my knowledge.				Each employee is responsible for his own safety		No		Deputy Division Manager for Rural Water

8/21/2014 14:49:15	toxford@usbr.gov	Yes	The regional program follows Reclamation guidance (RM policies and D&S). The Power Office and Field Division programs (program documents) follow the regional program (letters/memos).	Yes	Various means are maintained for the assessment	Don't know	Yes	Don't know	Yes	Various methods	Regional guidance	Yes	Yes	Deputy Power (Area) Manager
8/21/2014 15:47:46	manselme@usbr.gov	Yes	RSHS Safety and Health Handbook, Pacific Northwest Region, Snake River Area Office FIST 1-1 Hazard Communication Program, Anderson Ranch Field Office Environmental Management System Manual, Pacific Northwest Region Snake River Area Office, Joint Safety Committee Charter Letter FIST 4-1A Spill Prevention Control and Countermeasures Plans OSHA Guidelines NFPA 70 NEC Comprehensive Facility Reviews/ Periodic Facility Reviews	Yes	Various means are maintained for the assessment	No	JHA	Yes	Yes	This is the supervisor / managers duty to monitor all jobs in the facility	RSHS Sec. 4	No	Yes	
8/21/2014 16:16:13	dhartman@usbr.gov	Yes	From our ECAO Safety Manual, we reference: - 29 CFR 1960 - RSHS - Department of the Interior Safety & Occupational Health Program, Departmental Manual; Part 485 - Reclamation Directives and Standards related to safety and occupational health - NFPA documents such as Life Safety Code, National Electrical Code, 70E, etc... and others...	Yes	The method is explained in the Safety Program	Yes. New Employee Safety Orientation	Yes	Yes	Yes (all the above mentioned)	This is the supervisor / managers duty to monitor all jobs in the facility	If there is a potential danger, we evaluate it and write a JHA as to how we are going to deal with it satisfactorily.	Yes	For the most part, but some additional assistance is often needed and we have to go to the Region for help or an outside contractor	Area Office Safety Manager
8/22/2014 6:40:40	bmuller@usbr.gov	No		use reviews by the safety office and facilities	Documentation is not maintained	Done through annual safety walkthrough	Yes	No	No - remove the hazards when identified (office environment)	This is the supervisor / managers duty to monitor all jobs in the facility		Yes	Yes - rely on Denver Safety Office	Supervisor
8/22/2014 6:50:59	ckoenig@usbr.gov	Yes	OSHA, Reclamation Safety and Health Standards	Yes	The method is explained in the Safety Program	Managers of field personnel are given safety week training with their employees	Yes	No	Job specific JHA, SOP, Generic JHAs	When working alone operators are responsible for taking appropriate safety measures for their daily tasks. Supervisors insure appropriate safety equipment is available. For crew work an JHA is prepared. Employees participate in writing JHAs and in JHA breifings. JHAs are prepared at or near the time of the work taking in to account the current site conditions.	NKAO safety program. For each job the potential hazards are identified, evaluated, and mitigating measures are put in place.	No	Yes	Facility Manager (several facilities)
8/22/2014 9:49:34	jpowell@usbr.gov	Yes	Reclamation's RSHS "The Yellow Book" ANZI Z-10 OSHA 1910 Albuquerque Area Office Safety Policy "The Green Book"	Yes	Various means are maintained for the assessment	No	Yes	Yes	JHAs, Job Plans	Each employee responsible and know how to request updates	Monthly Adhoc inspections, weekly tool box meetings and monthly safety meetings	Yes	Yes	Facility Manager (one facility)
8/25/2014 9:09:14	ggirgis@usbr.gov	We have a division level safety program; however, we are working on a TSC wide safety program	FIST 1-1 and RSHS	Yes for our office/lab safety. Work with field offices regarding when working in the field/powerplant	Various means are maintained for the assessment	Office/lab safety are reviewed and JHAs are updated	As equipment is replaced in the lab	Through JHA	Yes, through JHA	This is the supervisor / managers duty to monitor all jobs in the facility	FIST 1-1 and RSHS	We know of it; however, no formal training has been provided by safety office	Yes, for office and lab work	Division Chief
8/25/2014 9:24:36	dgburke@usbr.gov	Yes	OSHA, RSHS, NFPA, ANSI.	Yes	The method is explained in the Safety Program		Yes	Yes	JHAs, Job Plans, SOPs. EAPs	yes, daily tool box safety	RSHS, safety office, workers experience	Yes	yes	PSII
8/25/2014 9:32:43	rbeall@usbr.gov	Yes	RSHS OSHA ANSI HECP	Yes	Various means are maintained for the assessment	Electronically	Yes	Yes	JHAs, Job Plans, SOPs	Each employee is responsible for his own safety	RSHS, OSHA, ANSI, HECP	Yes	Yes, but employee retention is an issue.	Facility Manager (several facilities)

8/25/2014 10:45:37	wcross@usbr.gov	Yes	RSHS, FIST, ECAO safety manual, NFPA 7OE	Yes but not very familiar where to find this info	The method is explained in the Safety Program	Not sure I was never showed	Unsure	If necessary, please explain your answer and where the procedure or process is documented.	Yes	This is the supervisor / managers duty to monitor all jobs in the facility	A step by step process to determine what needs to be on a JHA. PPE, type of hazard, engineering controls, Removing the hazard.	No	I'm not sure if I know were all the resources are located	Facility Manager (several facilities)
8/25/2014 11:40:12	rsilva@usbr.gov	Yes	RSHS, CFRs, Executive Order 12196. NFPA, ANSI, Fed Employees Compensation Program, DOI Safety and Health Manual, and all applicable state and local regulations.	Yes	Various means are maintained for the assessment	Yes. Not documented. OJT	Yes	No	Yes. JHAs, SOPs ,etc.	This is the supervisor / managers duty to monitor all jobs in the facility	Assessments are done by teams of o&m personnel on a periodic basis. The team meets with local personnel and performs a safety assessment. The results are put in a report.	No	Yes	Facility Manager (several facilities)
8/25/2014 13:07:47	mnorris@usbr.gov	Yes	RSHS YAO - Accident Reporting Investigation Program YAO - Bloodborne Pathogen Exposure Control Program YAO - Border Safety YAO - Fall Protection Program YAO - Hazard Communication Program YAO - Hazardous Energy Control Program (Lockout / Tagout) YAO - Head Protection Program YAO - Hearing Conservation Program YAO - Procedures for Obtaining Personal Protective Gear YAO - Procedures for Shelter In Place YAO - Respiratory Protection Program YAO - Safety and Occupational Health Program YAO - Safety Committee Charter	Yes	Various means are maintained for the assessment	Training Coordinator	The Safety Office conducts annual assessments of the facility with members of the office being assessed. Results of assessment is provided to the office chief.	Supervisors are advised of the hazards identified during the assessment with the corrective actions included in the document.	If there are locations identified, a JHA is prepared for that site.	The office assigns a Safety Observer for contractor projects. The supervisor / managers monitor their offices jobs. And, the Safety Office reviews site activities	Annual inspections of each office are accomplished by the Safety Office. Previous inspections provide guidance for assessments.	Yes	Yes	Deputy Area Manager
8/25/2014 13:31:54	sjarsky@usbr.gov	Yes	RSHS, FIST, D&S, Policy, Business Practices, and other Directives listed on the PN Safety Web Site. Area offices and field facilities have specific safety programs in place for safety measures required for their work.	Yes	Various means are maintained for the assessment	Developed a Safety Business Practice on Safety Training	Yes	Yes	CARMA JHAs and Job Plans	This is the supervisor / managers duty to monitor all jobs in the facility	SAF 01-06	I am familiar but have not had formal training.	There is not consistency in PN on exposure assessments,but a new IH position int the Regional Office will be tasked with ensuring consistency.	Regional senior management
8/25/2014 13:52:47	rskordas@usbr.gov	Region is developing a standardized safety program for all area offices following a safety program review by an independent contractor.	NA	No	Various means are maintained for the assessment	No	No	A risk analysis is performed for high risk activities.	Actions needed to mitigate a hazard identified in the Hazard Analysis are incorporated in the JHA.	This is the supervisor / managers duty to monitor all jobs in the facility	DOI Operational Risk Management manual	Familiar with ANSI Z10, however we are awaiting Denver Safety guidance on implementation procedures.	No, in addition to funded positions, require an additional professional safety specialist, and a industrial hygienist to fully implement requirements of ANSI Z10.	Area Manager
8/26/2014 8:59:55	aalaraji@usbr.gov	Yes	•ANSI Z-10 Occupational Hath & Safety Management Systems. •Regional Letter 1010-12-03 on Facility Safety Recognition. •RSHS and OSHA 1910 & 1926 standards for the compliance components of the program assessment.	Yes	The method is explained in the Safety Program	Not at this time.	Yes	Yes	Yes	While large contracted projects are observed by onsite safety inspectors, in house work is reviewed by employees involved after completion in order to update JHA & include any newly recognized hazards.	A hard copy of the procedure is on its way to you.	Yes	Yes	regional industrial hygienist & area safety specialist.
8/26/2014 16:53:03	tsawatzke@usbr.gov	Unsure		Unsure	Various means are maintained for the assessment	Generally yes, but still kind of hit and miss. Not sure what your definition of a "facility assessment" is?	No	for sure in relation to Arc Plash Risk	Hit and miss	Could be more than one of the choices above depending on the job.	Rely on our S&H specialist to guide us here	Yes	Mostly	Deputy Area Manager
8/27/2014 10:35:20	knjensen@usbr.gov	Yes	ANSI Z10 American National Standard for Occupational Health and Safety Management Systems. Reclamation Program Standard SAF-PO1 Safety and Occupational Health Program.	Yes	The method is explained in the Safety Program	annual management asses the effectiveness of the plan.	Yes	Yes	JHA's	This is the supervisor / managers duty to monitor all jobs in the facility	Assessments are completed by the Regional Safety Group and the CDSR	Yes	Yes	Supervisor

8/27/2014 12:17:19	drosenkrance@usbr.gov	Yes	Reclamation Safety & Health Standards Oct 2009 Ed OSHA 29 CFR 1910 General Practices OSHA 29 CFR 1926 Construction ANSI Z10 Construction/PPE	Yes	Various means are maintained for the assessment	No	The process is not written down but we do audits on a recurring basis.	No	JHA's, SOPs	Annual safety and security reviews	Safety Officer and Dam Operator inspect facilities utilizing Reclamation Safety and Health Standards, 29 CFR 1910 & 1926, ANSI Z10	No	Yes	Area Manager
8/27/2014 16:36:55	rlafond@usbr.gov	Yes	We have a division safety certification program.	GSA safety walkthrough	Various means are maintained for the assessment	No. GSA does asafety assessemnts.	Yes	No	we have JHAs for our labs	Doesn't look like this applies	GSA facilities. Safety assessments done duing annula walkthrough although sfatey hazards are discussed at my Group Manager metting on a weekly basis. If concerns are noted, O bring them to the attention of Facilities.	No	N/A	CE Services Division Chief
8/29/2014 13:18:48	msimpson@usbr.gov	Yes	RSHS Handbook NKAO Handbook OSHA Standards and Guidelines	Yes	Various means are maintained for the assessment	This is performed under the Regional Safety Officer and the Area Office Health and Safety Specialist	Yes	Not at the Area Office level	Yes - NKAO Safety Handbook, SOP's for each facility and specific JHAs	This is the supervisor / managers duty to monitor all jobs in the facility	Reclamation and OSHA Guidelines	Yes	Yes	Supv. Programs Manager
8/29/2014 15:35:00	rwelsh@usbr.gov	Yes	RSHS and SAF policy and D&S	Yes	Various means are maintained for the assessment	N/A	Yes	No	JHA	This is the supervisor / managers duty to monitor all jobs in the facility	various policy docs	Yes		Construction
9/2/2014 12:55:04	bmcclellen@usbr.gov	Yes	American National Standard for Occupational Health and Safety Management Systems (ANSI Z10); Reclamation Safety and Health Standards; OSHA Standards for Construction and Industry;	Yes	Various means are maintained for the assessment	Standard Employee Orientation includes instruction on performing and updating Facility Assessments, plus we do the 10 hour OSHA Course on a regular recurring basis.	Yes	Yes	Especially JHAs and Facility Inspection Checklists	This is the supervisor / managers duty to monitor all jobs in the facility	The Safety and Occupational Health Specialist and the Facility Manager follow the inspection checklist to accomplish the safety assessments at our facilities--the Safety Council then reviews the results, and management is kept in the loop through the Council's Executive	Yes	Yes	Area Office Safety Manager
9/2/2014 15:40:25	rlafrentz@usbr.gov	Yes	Reclamation Safety and Health Standards, Safety Directives and Standards, etc.	Yes	Various means are maintained for the assessment		Yes	Yes	JHA's, job plans, SOP's, etc.	Each employee is responsible for his own safety	RSAHM, D&S, etc.	some what	no	Facility Manager (several facilities)
9/3/2014 16:09:31	mskoric@usbr.gov	Yes	OSHA 1910, 1926, NEC, NFPA, NIOSH, FISTS, RSHS	Unsure	Various means are maintained for the assessment	No program.	Unsure	No	Yes, JHA's, SSOP's, FIST 1-1, HECP, F-HECP, Clearance Procedures (LOTO)	A Safety Observer is assigned to large projects	Not aware of guidance	No	Yes	Facility Manager (several facilities)
9/4/2014 11:17:25	chulet@usbr.gov	Yes	We have a Field Division Safety and Health Plan that is aligned with the "Plan - Do - Check - Act" approach as prescribed by ANSI Z10 and Reclamation Program Standard SAF PO-1. We also utilize several local practices including HECP, Hearing Protection, Hazard Communication, Confined Space, Respiratory Protection, Emergency Procedures. Many of these are in the process of updating at this time.	currently working on procedures	The method is explained in the Safety Program	Within our CMMS (CARMA)	Yes	Yes	All of the above	Supervisor and CDSR	Safety checklists	Yes	We need additional help from regional safety group.	Facility Manager (several facilities)
9/4/2014 12:08:32	mtrevino@usbr.gov	Yes	Reclamation Safety Manual, and policies for specific cases.	Yes	Various means are maintained for the assessment	Managers and supervisors are made aware of procedures, JHAs, and receive training as needed	Yes	Yes	YES	Each employee is responsible for his own safety	JHA and unforseen hazards are discussed prior to starting work	Yes	YES	Area Manager
9/4/2014 12:09:21	bbelchoff@usbr.gov	Yes	Safety Business Practice and Action Plan - Umatilla Field Office Columbia-Cascades Area (CCA) Safety Program Policy RSHS Manual	Unsure	Various means are maintained for the assessment	Our CCAO Safety Officer performs annual facility safety assessments, and we accompany him, and track status on corrections.	Unsure	Yes	We do JHAs.	Each employee is responsible for his own safety	CCAO Safety Officer performs annual facilities assessments. We also do job-by-job JHAs.	No	Yes.	Field Office Manager
9/4/2014 12:12:25	jgale@usbr.gov	Yes	rshs osha nec nfpa asme astm	Yes	The method is explained in the Safety Program	done in our safety office with training records	Yes	Yes	yep	This is the supervisor / managers duty to monitor all jobs in the facility		No	nope too much red tape and no formal aprroval process so you get punished for moving out and executing	Facility Manager (several facilities)
9/4/2014 12:21:46	mrelf@usbr.gov	Yes	RSHS, Regional Safety Business Practices, guidance documents available online, Reclamation Manual, JHAs	Yes	Various means are maintained for the assessment	Unsure	Yes	Unsure	Yes, as applicable	Unsure how to answer broadly	N/A	No	N/A	Project Manager

9/4/2014 12:32:09	mbowman@usbr.gov	Yes	http://intra.mp.usbr.gov/mp160/policy-guide/index.html	Yes	Various means are maintained for the assessment	no	Yes	Yes	yes	This is the supervisor / managers duty to monitor all jobs in the facility	SAF01-06	Yes	yes	Regional Safety Manager
9/4/2014 13:14:04	mspiker@usbr.gov	NA Program Office in Denver		Program Office No procedure			No			NA Program Office		No		Manager of a Program Office in Denver
9/4/2014 14:54:29	jortiz@usbr.gov	Yes	Reclamation Safety and Health Standards Area specific & site specific safety programs FIST 1.1 with Area Office Supplement (HECP) OSHA Hazardous Waste Operations 29 CFR 1910.120	Yes	The method is explained in the Safety Program		Yes	Yes	JHA's (work specific - PPE, Hearing Conservation, Hazard Communication, Confined Space, HECP, RSHS reference); Operations SOPs site specific/ hazard specific programs	JHAs are reviewed in toolbox safety meetings and pre-work safety reviews.	OSHA Walk-Through Checklist, Hazard Communication Program, Hazardous Waste Regulations, Emergency Action Plan, RSHS and Area Office Safety Programs	I have heard of Z10, but have not yet seen it implemented at my facility	Support staff are available at Area Office and Regional levels	Facility Manager (one facility)
9/4/2014 14:59:28	jallard@usbr.gov	Yes	29 CFR 1910 OSHA Reclamation Manual Reclamation Safety & Health Standards Oklahoma-Texas Area Office Occupational Safety & Health Program Oklahoma-Texas Area Office JHAs	No	Various means are maintained for the assessment	No. Extremely low supervisor/management turnover rate.	Yes	No	Yes	This is the supervisor / managers duty to monitor all jobs in the facility	Utilize a safety checklist	No	Yes	
9/4/2014 22:39:26	dwiedmeier@usbr.gov	Yes	OSHA 1970; EO 12196; 29 CFR 1960; FIST manuals; RSHS; SAF 01-01 thru 01-06; SAF 02-01; PN Region safety business practices; DOI Occupational medicine program handbook; DOI occupational health and safety training guide	No	Various means are maintained for the assessment	No	No	No	Yes	Each employee is responsible for his own safety	DOI SOH EVAL PROG	Yes	Yes	Area Manager
9/5/2014 7:03:30	ngarmon@usbr.gov	Yes	(OSHA) 29 CFR 1910 Reclamation Manual Reclamation Safety and Health Standards (RSHS) OTAO Occupational Safety and Health Program Summary OTAO JHAs Other locally written programs for training, confined spaces, etc.	No	Various means are maintained for the assessment	No	Yes	No	Yes	This is the supervisor / managers duty to monitor all jobs in the facility	Checklist	No	Yes	Collateral Duty Safety Officer
9/5/2014 7:37:08	athompson@usbr.gov	Yes	RSHS, NKAO Safety Handbook, also often use OSHA Standards	Yes	Various means are maintained for the assessment	The Facility Assessement are done through the Regional Safety Office and Area Safety Office not at the Managers level.	Yes	Not at the Area Office level	Yes, NKAO Safety Handbook and each facilities SOP	This is the supervisor / managers duty to monitor all jobs in the facility	Standards were established by RSHS and OSHA	Yes	Yes	Area Manager
9/5/2014 8:47:23	candrews@usbr.gov	As much is legal	GCPO uses RSHS, USBR D&S, 29 CFR, and a local GCPO Safety Manual which is the implementing document. An example is RSHS and OSHA say to have a respirator program, the program is in the GCPO Safety Manual.	Yes	The method is explained in the Safety Program	Yes, we regularly offer OSHA 6000	Yes	Yes	yes, JHA procedure and Maintenance execution checklist	This is the supervisor / managers duty to monitor all jobs in the facility	SAF 01-06	Yes	yes	Area Office Safety Manager
9/5/2014 12:34:01	smsmith@usbr.gov	Yes	Reclamation Safety Directives & Standards, Reclamation Safety and Health Standards, and OSHA requirements.	Yes	Various means are maintained for the assessment	Training consistency could be improved.	Yes	No	Yes. Both JHA's & SOP's.	This is the supervisor / managers duty to monitor all jobs in the facility	SAF 01-06. RSHS. Professional experience.	Yes	No. Current safety staffing needs to be reviewed.	Regional Safety Manager
9/5/2014 15:02:30	smarquez@usbr.gov	Yes	We utilize, Safety D&S, Reclamation Safety & Health Standards, FIST, DOI, and OSHA 1960, 1910 & 11926	Yes	Various means are maintained for the assessment	No	Yes	Partially varies area office to area office	Yes, the JHA process naturally follows the assessment	This is the supervisor / managers duty to monitor all jobs in the facility	RSHS 4.1 &SAF 01 06	Yes	The process needs to be improved and process implementation verified	Regional Safety Manager
9/5/2014 15:39:43	tglover@usbr.gov	Yes	HECP, Confined Space, RSHS etc	No	Documentation is not maintained	Formal Report	Yes	No	Yes	This is the supervisor / managers duty to monitor all jobs in the facility	Work with Safety Professional	No	Yes	Facility Manager (several facilities)

9/5/2014 16:24:43	dphilmon@usbr.gov	GCPO Safety and Health Program	They are numerious so this list is not all inclusive: GCPO Safety and Health Program, CFR1910, CFR1926, RSHS, NFPA, FIST, NEC, NESC, ...	RSHS Section 4/JHA	Various means are maintained for the assessment	RSHS training	Not that I'm aware of.	I'm not sure what this question is referring to.	Yes, special procedures and or Job Plans in CARMA, additionally, we have program specific documents, e.g. confined space, fall protection, hearing conservation, etc.	I'm not clear on what "assessments" are being referred to. Facility assessment for fire code compliance, hazardous chemical for cleaning floors, noise surveys/assessments?	RSHS Section 4, otherwise not sure where to find this.	Im not familiar with this standard. Is it part of Reclamations Safey and Health program?	Not sure. Requirements for documentation, training, monitoring, assessments, maintenance, PPE, etc. have over come the capability of my current staff. I have a Safety Specialist, but no industrial hygienist readily available to ensure compliance with SAF 02-01.	Facility Manager (one facility)
9/5/2014 17:06:33	blongwell@usbr.gov	Yes	Reference documents used include, but is not limited, to the following: RSHS OSHA Act of !970, Section 19 29 CFR 1910 29 CFR 1926 29 CFR 1960 DM 485, Safety Standards SAF 01-01, 01-02, 01-03, 01-04 Regional Safety Policy Letters	Yes	Various means are maintained for the assessment	Within the survey, a number of assessments are mentioned including Hazard Assessments (JHA??), Facility Assessments, and Safety Assessments. I am not entirely clear what the difference is between the various assessments that are mentioned. If the facility assessment is referring to a facility inspection, we utilize Regional safety professionals to perform an annual facility inspection. Quarterly inspections are performed by office personnel on a rotating volunteer basis. RSHS training forms the basis for the training that is provided to personnel that perform the inspections. Documentation is maintained by the office safety clerk.	If by facility assessments you are referring to facility inspections, the process for performing the facility inspections is documented in the office safety manual.	Not familiar with the risk analysis process as applied to hazards identified in facility inspections. Would be interested in learning more.	Yes	JHAs are the primary method for identifying the hazards associated with a specific task, although other plans (HECP, etc) may be applicable depending on the specific activity. The identification of hazards is a joint effort between the supervisors and the employees. We are implementing a process whereby the CDSR will spotcheck compliance with JHA on a periodic basis.	The process for JHA and health hazard assessments are discussed in the office safety manual.	Yes	Yes	Area Manager
9/8/2014 10:25:22	tkoczur@usbr.gov	In general, yes, but we have had to readdress several different programs such as Confined Spaces, Hexavalent Chromium, PPE, etc.	We use OSHA, RSHS, NEC, ANSI, AMSE, and FIST as necessary in the development of our programs.	Our process has been lax and we have been going through an update in how we prepare JHAs, SHAs.	Various means are maintained for the assessment	No.	No. However, we do have a new safety officer and that is going to change to a yes in the near future.	In general yes but our JHAs are being updated.	In general, yes.	In general, personnel or supervisors will update these before tasks are accomplished. Feedback is always accepted.	Safety assessments are being performed by our Regional offices or by our new safety officer.	Yes	Our programs haven't been cared for as much as they should have. Hence, we are rebuilding many of the programs.	Facility Manager (several facilities)
9/8/2014 17:31:32	hbailey@usbr.gov	Yes	OSHA, RSHS, ECAO Safety Manual	Yes	Various means are maintained for the assessment	ECAO Safety Manual	Yes	Yes	JHAs	This is the supervisor / managers duty to monitor all jobs in the facility		Yes	Yes	Security Specialist
9/10/2014 22:44:30	cwsmith@usbr.gov	Yes	RD's letter of 1 Jul 2014 Facility safety program	Yes	The method is explained in the Safety Program	Not sure, but I think it's in development.	Unsure	Not sure	Yes	A Safety Observer is assigned to large projects	Each work area has a safety personnel that performs the assessments	No	Yes	Facility Manager (several facilities)
9/17/2014 8:57:08	bwagner@usbr.gov	Yes		Yes	Various means are maintained for the assessment	no	Yes	Yes	yes	Each employee is responsible for his own safety	jha's, sop's, customizing the hazardous energy program for project facilities	Yes	yes	office manager/ field manager

Appendix D – SME Procedure

Safety Management Evaluation (SME)

Background

The Reclamation Safety Office assessment of safety and health conditions at a location depends on a clear understanding of the programs and management systems that a location is using for safety and health compliance. Reclamation places a high priority on safety and health programs and wishes to encourage their implementation.

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Using the SME

The SME will be used as a source of safety and health program evaluation for the location, employees, and OSHA.

Gathering Information for the SME begins during the opening conference and continues through the inspection process.

The Reclamation Safety Office shall explain the purpose of the SME and obtain information about the location's safety and health program in order to make an initial assessment about the program.

This initial assessment shall be verified--or modified--based on information obtained in interviews of an appropriately representative number of employees and by observation of actual safety and health conditions during the inspection process.

If the location does not wish to volunteer the information needed for the SME, the Reclamation Safety Office shall note this in the case file but shall not press the issue. The benefits of a SME evaluation shall, however, be explained.

Recording the Score. The program elements in the SME correspond to the major elements of the DOI Safety Evaluation.

Elements. The six elements to be scored in the SME are:

Management Leadership

Employee Involvement

Hazard Prevention and Prevention

Evaluation and Analysis

Training and Awareness

Program Implementation and Operation

Factors. These elements [except fo Training] are divided into factors, which will also be scored. The score for an element will be determined by the factor scores. The factors are:

Management leadership.

Employee Involvement.

Implementation [tools provided by management, including budget, information, personnel, assigned responsibility, adequate expertise and authority, line accountability, and program review procedures].

Contractor safety.

Workplace Analysis.

Survey and hazard analysis.

Inspection.

Reporting.

Accident and Record Analysis.

Investigation of accidents and near-miss incidents.

Data analysis.

Hazard Prevention and Control.

Hazard control.

Maintenance.

Medical program.

Emergency Response.

Emergency preparedness.

First aid.

Safety and Health Training (as a whole).

Scoring. The Reclamation Safety Office shall objectively score the establishment on each of the individual factors and elements after obtaining the necessary information to do so. (See 'Using the SME' 5., below.) These shall be given a score of 1, 2, 3, 4, or 5.

Appendix B contains the SME Tables, which provide verbal descriptors of workplace characteristics for each factor for each of the five levels. Reclamation Safety Offices shall refer to these tables as appropriate to ensure that the score they assign to a factor corresponds to the descriptor that best fits the worksite.

NOTE: The descriptors are intended as brief illustrations of a workplace at a particular level. In exercising their professional judgment, the Reclamation Safety Office Representative should proceed

with the understanding that the descriptor that "best fits" will not necessarily match the workplace exactly or in literal detail.

Determine scores for each of the six elements as follows:

The score for the "Management Leadership and Employee Involvement" elements shall be whichever is the lowest of the following:

The score for the "Management Leadership" factor.

The score for the "Employee Involvement" factor.

The average score for all four factors.

NOTE: The factors of "Management Leadership" and "Employee Involvement" are given greater weight because they are considered the foundation of a safety and health program.

For the sixth element, Training, just determine the level 1-5 that best fits the worksite and note it in the appropriate box on the SME.

For each of the other four elements, average the scores for the factors.

In averaging factor scores, round to the nearest whole number (1, 2, 3, 4, or 5). Round up from one-half (.5) or greater; round down from less than one-half (.5).

If the location declines to provide pertinent information regarding one or more factors or elements, a score of 1 shall be recorded for the factor or element.

If the element or factor does not apply to the worksite being inspected, a notation of "Not Applicable" shall be made in the space provided. This shall be represented by "N/A." This shall not affect the score.

Overall Score. An "Overall Score" for the worksite will be recorded on the score summary. This will be the average of the six individual scores for elements, rounded to the nearest whole number (1, 2, 3, 4, or 5). Round up from one-half (.5)or greater; round down from less than one-half (.5).

EXAMPLE: A SME's element scores are:

2 + 2 + 1 + 3+ 2 + 3 = 13

13/6 = 2.16 = 2

Rating and Tracking. The six individual element scores, in sequence (e.g., "2-2-1-2-3-1") will constitute a "rating" for purposes of tracking improvements in an establishment's safety and health program, and shall be recorded.

Program Levels. The Overall Score on the SME constitutes the "level" at which the establishment's safety and health program is scored. Remember: this level is a relatively informal assessment of the program, and it does not represent a compliance judgment --that is, it does not determine whether an location is in compliance with OSHA standards. The following chart summarizes the levels:

Score	Level of Safety and Health Program
5	Outstanding program
4	Superior program
3	Basic program
2	Developmental program
1	No program or ineffective program

Specific Scoring Guidance. The following shall be taken into account in assessing specific factors:

Written Programs. Location safety and health programs should be in writing in order to be effectively implemented and communicated.

Nevertheless, a program's effectiveness is more important than whether it is in writing. A small worksite may well have an effective program that is not written, but which is well understood and followed by employees.

Employee Involvement.

Employee involvement in an location’s safety and health program is essential to its effectiveness. Thus, evaluation of safety and health programs must include objective assessment of the ways in which workers' rights under the OSH Act are addressed in form and practice. The SME Tables include helpful information in this regard.

Employee involvement should also include Involvement in the OSHA enforcement process; e.g., walk around inspections, interviews, informal conferences, and formal settlement discussions, as may be appropriate. Many methods of employee involvement may be encountered in individual workplaces.

Comprehensiveness. The importance of a safety and health program's comprehensiveness is implicitly addressed in Workplace Analysis under both "Survey and hazard analysis" and "Data analysis." An effective safety and health program shall address all known and potential sources of workplace injuries and illnesses, whether or not they are covered by a specific OSHA standard. For example, lifting hazards and workplace violence problems should be addressed if they pertain to the specific conditions in the establishment.

Consistency with Hazards Found. The SME evaluation and the scores assigned to the individual elements and factors should be consistent with the types and numbers of hazards found during the inspection and with any citations issued in the case. As a general rule, high scores will be inconsistent with numerous or serious hazards or a high injury/illness rate. The following are examples for general guidance:

If applicable OSHA standards require training, but the location does not provide it, the SME score for "Training" should not normally exceed "2."

If hazard analyses (e.g., for permit-required confined spaces or process safety management) are required but not performed by the location, the SME score for "Workplace analysis" should not normally exceed "2."

If the inspection finds numerous serious violations--in particular, high-gravity serious violations--relative to the size and type of workplace, the SME score for "Hazard prevention and Control" should not normally exceed "2."

Scope of the SME Review. The duration of the SME review will vary depending on the circumstances of the workplace and the inspection. In all cases, however, this review shall include:

A review of any appropriate location documentation relating to the safety and health program.

A walk around inspection of pertinent areas of the workplace.

Interviews with an appropriate number of location and employee representatives.

Appendix A
The Safety Management Evaluation (SME)

Each of the elements and factors of the SME may be scored from 1 to 5, indicating the level of the safety and health program, as follows:

Overall Score	**Level of Safety and Health Program**
5	Outstanding program
4	Superior program
3	Basic program
2	Developmental program
1	No program or ineffective program

Scoring. Score the establishment on each of the factors and elements after obtaining the necessary information to do so. These shall be given a score of 1, 2, 3, 4, or 5.

- Refer to the SME Tables, Appendix B, as appropriate; to ensure that the score given to a factor corresponds to the descriptor that best fits the location. Determine scores for each of the six elements as follows:
- The score for the Management Leadership and Employee Involvement element shall be whichever is the lowest of the following:
- The score for the "Management Leadership" factor, or
- The score for the "Employee Involvement" factor, or
- The average score for all four factors.
- For the sixth element, Training, just determine the level 1-5 that best fits the worksite and note it in the appropriate box on the SME.
- For each of the other four elements, average the scores for the factors.
- If the location declines to provide pertinent information regarding one or more factors or elements, a score of 1 shall be recorded for the factor or element.
- If the element or factor does not apply to the worksite being inspected, a notation of "Not Applicable" shall be made in the space provided. This shall be represented by "N/A." This shall not affect the score.

Overall Score. An "Overall Score" for the worksite will be recorded on the SME. This will be the average of the six individual scores for elements, rounded to the nearest whole number (1, 2, 3, 4, or 5). Round up from one-half (.5)or greater; round down from less than one-half (.5).

EXAMPLE: A SME's element scores are:

2.5 +2.7 +2.3 +3.0 +2.3 + 2.0 = 14.8

14.8/6 = 2.467 SME Score

SME Program Evaluation Profile Location: Inspection Inspector	**Management Leadership**			**Employee Involvement**	**Hazard Recognition And Prevention**			**Evaluation and Analysis**			**Program Implementation and Operation**		**Training and Awareness**		
	Management Leadership	Implementation	Contractor Safety	Employee Involvement	Survey & Hazard Analysis	Inspection	Hazard Reporting Analysis	Accident Investigation	Data Analysis	Hazard Control	Maintenance	Medical Program	Emergency Preparedness	First Aid	Training
Outstanding															
Superior															
Basic															
Developme nta l															
Absent or Ineffective															
Score for Element															
Overall Score															

The SME Tables

The text in each block provides a description of the program element or factor that corresponds to the level of program that the location has implemented in the workplace.

To avoid duplicative language, each level should be understood as containing all positive factors included in the level below it. Similarly, each element score should be understood as containing all positive factors of the element scores below it. That is, a 3 is at least as good as a 2; a 4 is at least as good as a 3, and so on.

The descriptors are intended as brief illustrations of a workplace at a particular level. In exercising their professional judgment, Reclamation Safety Offices should proceed with the understanding that the descriptor that "best fits" will not necessarily match the workplace exactly or in literal detail.

MANAGEMENT LEADERSHIP

Management Leadership

Visible management leadership provides the motivating force for an effective safety and health program. [1989 Voluntary Safety and Health Program Management Guidelines, (b)(1) and (c)(1)]

1	Management demonstrates no policy, goals, objectives, or interest in safety and health issues at this worksite.
2	Management sets and communicates safety and health policy and goals, but remains detached from all other safety and health efforts.
3	Management follows all safety and health rules, and gives visible support to the safety and health efforts of others.
4	Management participates in significant aspects of the site's safety and health program, such as site inspections, incident reviews, and program reviews. Incentive programs that discourage reporting of accidents, symptoms, injuries, or hazards are absent. Other incentive programs may be present.
5	Site safety and health issues are regularly included on agendas of management operations meetings. Management clearly demonstrates--by involvement, support, and example--the primary importance of safety and health for everyone on the worksite. Performance is consistent and sustained or has improved over time.

EMPLOYEE INVOLVEMENT

Employee Involvement

Employee Involvement provides the means through which workers identify hazards, recommend and monitor abatement, and otherwise participate in their own protection.]

1	Worker Involvement in workplace safety and health concerns is not encouraged. Incentive programs are present which have the effect of discouraging reporting of incidents, injuries, potential hazards or symptoms. Employees are not involved in the safety and health program.
2	Workers can participate freely in safety and health activities at the worksite without fear of reprisal. Procedures are in place for communication between location and workers on safety and health matters. Worker rights under the Occupational Safety and Health Act to refuse or stop work that they reasonably believe involves imminent danger are understood by workers and honored by management. Workers are paid while performing safety activities.
3	Workers are involved in the safety and health program, involved in inspection of work area, and are permitted to observe monitoring and receive results. Workers' right of access to information is understood by workers and recognized by management. A documented

	procedure is in place for raising complaints of hazards or discrimination and receiving timely location responses.
4	Workers participate in workplace analysis, inspections and investigations, and development of control strategies throughout facility, and have necessary training and education to participate in such activities. Workers and their representatives have access to all pertinent health and safety information, including safety reports and audits. Workers are informed of their right to refuse job assignments that pose serious hazards to themselves pending management response.
5	Workers participate fully in development of the safety and health program and conduct of training and education. Workers participate in audits, program reviews conducted by management or third parties, and collection of samples for monitoring purposes, and have necessary training and education to participate in such activities. Location encourages and authorizes employees to stop activities that present potentially serious safety and health hazards.

MANAGEMENT LEADERSHIP a

Implementation

Implementation means tools, provided by management, that include:

-- budget
-- information
-- personnel
-- assigned responsibility
-- adequate expertise and authority
-- means to hold responsible persons accountable (line accountability)
-- program review procedures.

1	Tools to implement a safety and health program are inadequate or missing.
2	Some tools to implement a safety and health program are adequate and effectively used; others are ineffective or inadequate. Management assigns responsibility for implementing a site safety and health program to identified person(s). Management's designated representative has authority to direct abatement of hazards that can be corrected without major capital expenditure.
3	Tools to implement a safety and health program are adequate, but are not all effectively used. Management representative has some expertise in hazard recognition and applicable OSHA requirements. Management keeps or has access to applicable OSHA standards at the facility, and seeks appropriate guidance information for interpretation of OSHA standards. Management representative has authority to order/purchase safety and health equipment.

4	All tools to implement a safety and health program are more than adequate and effectively used. Written safety procedures, policies, and interpretations are updated based on reviews of the safety and health program. Safety and health expenditures, including training costs and personnel, are identified in the facility budget. Hazard abatement is an element in management performance evaluation.
5	All tools necessary to implement a good safety and health program are more than adequate and effectively used. Management safety and health representative has expertise appropriate to facility size and process, and has access to professional advice when needed. Safety and health budgets and funding procedures are reviewed periodically for adequacy.

MANAGEMENT LEADERSHIP

Contractor Safety

Contractor safety: An effective safety and health program protects all personnel on the worksite, including the employees of contractors and subcontractors. It is the responsibility of management to address contractor safety.

1	Management makes no provision to include contractors within the scope of the worksite's safety and health program.
2	Management policy requires contractor to conform to Reclamation standards and OSHA regulations and other legal requirements.
3	Management designates a representative to monitor contractor safety and health practices, and that individual has authority to stop contractor practices that expose host or contractor employees to hazards. Management informs contractor and employees of hazards present at the facility.
4	Management investigates a contractor's safety and health record as one of the bidding criteria.
5	The site's safety and health program ensures protection of everyone employed at the worksite, i.e., regular full-time employees, contractors, temporary and part-time employees.

HAZARD RECOGNITION AND PREVENTION

Survey and Hazard Analysis

Survey and hazard analysis: An effective, proactive safety and health program will seek to identify and analyze all hazards. In large or complex workplaces, components of such analysis are the comprehensive survey and analyses of job hazards and changes in conditions. [Guidelines, (c)(2)(i)]

1	No system or requirement exists for hazard review of planned/changed/new operations. There is no evidence of a comprehensive survey for safety or health hazards or for routine job hazard analysis.
2	Surveys for violations of standards are conducted by knowledgeable person(s), but only in response to accidents or complaints. The location has identified principal OSHA standards which apply to the worksite.
3	Process, task, and environmental surveys are conducted by knowledgeable person(s) and updated as needed and as required by applicable standards. Current hazard analyses are written (where appropriate) for all high-hazard jobs and processes; analyses are communicated to and understood by affected employees. Hazard analyses are conducted for jobs/ tasks/workstations where injury or illnesses have been recorded.
4	Methodical surveys are conducted periodically and drive appropriate corrective action. Initial surveys are conducted by a qualified professional. Current hazard analyses are documented for all work areas and are communicated and available to all the workforce; knowledgeable persons review all planned/changed/new facilities, processes, materials, or equipment.
5	Regular surveys including documented comprehensive workplace hazard evaluations are conducted by certified safety and health professional or professional engineer, etc. Corrective action is documented and hazard inventories are updated. Hazard analysis is integrated into the design, development, implementation, and changing of all processes and work practices.

HAZARD RECOGNITION AND PREVENTION

Inspection

Inspection: To identify new or previously missed hazards and failures in hazard controls, an effective safety and health program will include regular site inspections. [Guidelines, (c)(2)(ii)]

1	No routine physical inspection of the workplace and equipment is conducted.
2	Supervisors dedicate time to observing work practices and other safety and health conditions in work areas where they have responsibility.
3	Competent personnel conduct inspections with appropriate involvement of employees. Items in need of correction are documented. Inspections include compliance with relevant OSHA standards. Time periods for correction are set.
4	Inspections are conducted by specifically trained employees, and all items are corrected promptly and appropriately. Workplace inspections are planned, with key observations or check points defined and results documented. Persons conducting inspections have specific training in hazard identification applicable to the facility. Corrections are documented through follow-up inspections. Results are available to workers.

5	Inspections are planned and overseen by certified safety or health professionals. Statistically valid random audits of compliance with all elements of the safety and health program are conducted. Observations are analyzed to evaluate progress.

HAZARD RECOGNITION AND PREVENTION

Hazard Reporting

A reliable hazard reporting system enables employees, without fear of reprisal, to notify management of conditions that appear hazardous and to receive timely and appropriate responses.

1	No formal hazard reporting system exists, or employees are reluctant to report hazards.
2	Employees are instructed to report hazards to management. Supervisors are instructed and are aware of a procedure for evaluating and responding to such reports. Employees use the system with no risk of reprisals.
3	A formal system for hazard reporting exists. Employee reports of hazards are documented, corrective action is scheduled, and records maintained.
4	Employees are periodically instructed in hazard identification and reporting procedures. Management conducts surveys of employee observations of hazards to ensure that the system is working. Results are documented.
5	Management responds to reports of hazards in writing within specified time frames. The workforce readily identifies and self-corrects hazards; they are supported by management when they do so.

EVALUATION and ANALYSIS

Accident Investigation

Accident investigation: An effective program will provide for investigation of accidents and "near miss" incidents, so that their causes, and the means for their prevention, are identified.

1	No investigation of accidents, injuries, near misses, or other incidents is conducted.
2	Some investigation of incidents takes place, but root cause may not be identified, and correction may be inconsistent. Supervisors prepare injury reports for lost time cases.
3	A SMIS report is completed for all recordable incidents. Reports are generally prepared with cause identification and corrective measures prescribed.
4	OSHA-recordable incidents are always investigated, and effective prevention is implemented. Reports and recommendations are available to employees. Quality and completeness of

	investigations are systematically reviewed by trained safety personnel.
5	All loss-producing accidents and "near-misses" are investigated for root causes by teams or individuals that include trained safety personnel and employees.

EVALUATION and ANALYSIS

Data Analysis

Data analysis: An effective program will analyze injury and illness records for indications of sources and locations of hazards, and jobs that experience higher numbers of injuries. By analyzing injury and illness trends over time, patterns with common causes can be identified and prevented.

1	Little or no analysis of injury/illness records; records (exposure monitoring) are kept or conducted.
2	Data is collected and analyzed, but not widely used for prevention. Exposure records and analyses are organized and are available to safety personnel.
3	Injury/illness logs and exposure records are kept correctly, are audited by facility personnel, and are essentially accurate and complete. Rates are calculated so as to identify high risk areas and jobs. Significant analytical findings are used for prevention.
4	Location can identify the frequent and most severe problem areas, the high risk areas and job classifications, and any exposures responsible for OSHA recordable cases. Data are fully analyzed and effectively communicated to employees. Illness/injury data are audited and certified by a responsible person.
5	All levels of management and the workforce are aware of results of data analyses and resulting preventive activity. External audits of accuracy of injury and illness data, including review of all available data sources are conducted. Scientific analysis of health information, including non-occupational data bases is included where appropriate in the program.

EVALUATION AND ANALYSIS

Hazard Control

Hazard Control: Workforce exposure to all current and potential hazards should be prevented or controlled by using engineering controls wherever feasible and appropriate, work practices and administrative controls, and personal protective equipment (PPE).

1	Hazard control is seriously lacking or absent from the facility.
2	Hazard controls are generally in place, but effectiveness and completeness vary. Serious hazards may still exist. Location has achieved general compliance with applicable Reclamation

	Standards and OSHA requirements regarding hazards with a significant probability of causing serious physical harm. Hazards that have caused past injuries in the facility have been corrected.
3	Appropriate controls (engineering, work practice, and administrative controls, and PPE) are in place for significant hazards. Some serious hazards may exist. Location is generally in compliance with voluntary standards, industry practices, and manufacturers' and suppliers' safety recommendations. Documented reviews of needs for machine guarding, energy lockout, ergonomics, materials handling, Bloodborne pathogens, confined space, hazard communication, and other generally applicable standards have been conducted. The overall program tolerates occasional deviations.
4	Hazard controls are fully in place, and are known and supported by the workforce. Few serious hazards exist. The location requires strict and complete compliance with all OSHA, consensus, and industry standards and recommendations. All deviations are identified and causes determined.
5	Hazard controls are fully in place and continually improved upon based on workplace experience and general knowledge. Documented reviews of needs are conducted by certified health and safety professionals or professional engineers, etc.

PROGRAM IMPLEMENTATION AND OPERATION

Maintenance

Maintenance: An effective safety and health program will provide for facility and equipment maintenance, so that hazardous breakdowns are prevented.

1	No preventive maintenance program is in place; break-down maintenance is the rule.
2	There is a preventive maintenance schedule, but it does not cover everything and may be allowed to slide or performance is not documented. Safety devices on machinery and equipment are generally checked before each shift.
3	A preventive maintenance schedule is implemented for areas where it is most needed; it is followed under normal circumstances. Manufacturers' and industry recommendations and consensus standards for maintenance frequency are complied with. Breakdown repairs for safety related items are expedited. Safety device checks are documented. Ventilation system function is observed periodically.
4	The location has effectively implemented a preventive maintenance schedule that applies to all equipment. Facility experience is used to improve safety-related preventative maintenance scheduling.
5	There is a comprehensive safety and preventive maintenance program that maximizes equipment reliability.

PROGRAM IMPLEMENTATION AND OPERATION

Medical Program

An effective safety and health program will include a suitable medical program where it is appropriate for the size and nature of the workplace and its hazards.

1	Location is unaware of, or unresponsive to medical needs. Required medical surveillance, monitoring, and reporting are absent or inadequate.
2	Required medical surveillance, monitoring, removal, and reporting responsibilities for applicable standards are assigned and carried out, but results may be incomplete or inadequate.
3	Medical surveillance, removal, monitoring, and reporting comply with applicable standards. Employees report early signs/symptoms of job-related injury or illness and receive appropriate treatment.
4	Health care providers provide follow-up on employee treatment protocols and are involved in hazard identification and control in the workplace. Medical surveillance addresses conditions not covered by specific standards. Employee concerns about medical treatment are documented and responded to.
5	Health care providers are on-site for all production shifts and are involved in hazard identification and training. Health care providers periodically observe the work areas and activities and are fully involved in hazard identification and training.

Training and Awareness

Emergency Preparedness

Emergency preparedness: There should be appropriate planning, training/drills, and equipment for response to emergencies. Note: In some facilities the location plan is to evacuate and call the fire department. In such cases, only applicable items listed below should be considered.

1	Little or no effective effort to prepare for emergencies.
2	Emergency response plans for fire, chemical, and weather emergencies as required by 29 CFR 1910.38, 1910.120, or 1926.35 are present. Training is conducted as required by the applicable standard. Some deficiencies may exist.
3	Emergency response plans have been prepared by persons with specific training. Appropriate alarm systems are present. Employees are trained in emergency procedures. The emergency response extends to spills and incidents in routine production. Adequate supply of spill control and PPE appropriate to hazards on site is available.

4	Evacuation drills are conducted no less than annually. The plan is reviewed by a qualified safety and health professional.
5	Designated emergency response team with adequate training is on-site. All potential emergencies have been identified. Plan is reviewed by the local fire department. Plan and performance are reevaluated at least annually and after each significant incident. Procedures for terminating an emergency response condition are clearly defined.

Training and Awareness

First Aid

First aid/emergency care should be readily available to minimize harm if an injury or illness occurs. [

1	Neither on-site nor nearby community aid (e.g., emergency room) can be ensured.
2	Either on-site or nearby community aid is available on every shift.
3	Personnel with appropriate first aid skills commensurate with likely hazards in the workplace and as required by OSHA standards (e.g., 1910.151, 1926.23) are available. Management documents and evaluates response time on a continuing basis.
4	Personnel with certified first aid skills are always available on-site; their level of training is appropriate to the hazards of the work being done. Adequacy of first aid is formally reviewed after significant incidents.
5	Personnel trained in advanced first aid and/or emergency medical care are always available on-site. In larger facilities a health care provider is on-site for each production shift.

TRAINING and AWARENESS

Safety and health training should cover the safety and health responsibilities of all personnel who work at the site or affect its operations. It is most effective when incorporated into other training about performance requirements and job practices. It should include all subjects and areas necessary to address the hazards at the site.

1	Facility depends on experience and peer training to meet needs. Managers/supervisors demonstrate little or no involvement in safety and health training responsibilities.
2	Some orientation training is given to new hires. Some safety training materials (e.g., pamphlets, posters, videotapes) are available or are used periodically at safety meetings, but there is little or no documentation of training or assessment of worker knowledge in this area. Managers generally demonstrate awareness of safety and health responsibilities, but have limited training themselves or involvement in the site's training program.

3	Training required by applicable standards is provided to all site employees. Supervisors and managers attend training in all subjects provided to employees under their direction. Employees can generally demonstrate the skills/knowledge necessary to perform their jobs safely. Records of training are kept and training is evaluated to ensure that it is effective.
4	Knowledgeable persons conduct safety and health training that is scheduled, assessed, and documented, and addresses all necessary technical topics. Employees are trained to recognize hazards, and facility practices. Employees are trained to report violations to management. All site employees--including supervisors and managers--can generally demonstrate preparedness for Involvement in the overall safety and health program. There are easily retrievable scheduling and record keeping systems.
5	Knowledgeable persons conduct safety and health training that is scheduled, assessed, and documented. Training covers all necessary topics and situations, and includes all persons working at the site (hourly employees, supervisors, managers, contractors, part-time and temporary employees). Employees participate in creating site-specific training methods and materials. Employees are trained to recognize inadequate responses to reported program violations. Retrievable record keeping system provides for appropriate retraining, makeup training, and modifications to training as the result of evaluations.

Appendix E – DOI Assessment Tool

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

U.S. Department of the Interior

Mr. Barry Noll, PE
Safety and Occupational Health Manager
Office of Occupational Health and Safety
U.S. Dept. of Interior

March 8, 2010

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Introduction

This Handbook has been prepared to help users complete the Department of Interior's (DOI) Safety and Occupational Health (SOH) Program Evaluation Tool. Whereas the Tool provides the framework and scoring criteria to be used to evaluate a DOI organization with respect to each of 27 specific SOH program Elements within six broad Components, this Handbook is intended to provide the users with additional insight into the types of considerations that are important during the inquiry and the evaluation processes. Overall, it is the goal of this Handbook to help evaluators apply the Tool to the many diverse organizations within the DOI by providing additional explanatory information, example interview questions, ideas for determining how criteria should be applied to a specific workplace, and considerations for assigning meaningful ratings for the various program Elements.

As indicated in the "Instructions for Users" section of the Tool, different organizations and workplaces may require varying approaches to the SOH evaluation as well as emphasis on different programmatic Elements, lines of inquiry, or documents. For example, an organization or workplace with where high hazard activities are frequently performed requires a greater degree of confidence that the SOH program is effective than those that have few potential hazards. Similarly, an organization that relies heavily of contractors might require an emphasis on different programmatic Elements than one that does not. The SOH programs of these organizations can and should 'look different' from the perspective of the evaluator and it is a goal of this Handbook to provide insight into what is necessary and sufficient with respect to the challenges faced by each organization's SOH program. However, while the emphasis on a particular evaluation Element may differ from one bureau or office to another, each Element should never-the-less be a part of any organization's SOH program in order to demonstrate conformance with the DOI's OHS policies, applicable standards and regulations. That is, while what is considered an "effective program" may differ depending on the needs of the different organizations, the evaluator must look at each element and determine to what extent it meets the organizational needs identified. This Handbook is intended to assist with these considerations.

This Handbook is organized into the following sections:

<u>Component</u>: General introductory information is provided for each of the six Components. Components are the overall groupings or categories which are comprised of a certain number of the 27 evaluation Elements. The Elements within a Component are related by common programmatic objectives. For example, the first Component, "Leadership and Management", provides explanatory information relating to the Elements, i.e., "Management Commitment, Involvement and Communication", "Responsibility and Accountability", "Financial Resources", "Personnel Resources", "Policy", and "Program Promotion and Recognition".

<u>Element</u>: Introductory information is provided for each element. This information summarizes and reinforces key considerations for the evaluator, as further detailed later in the various descriptive sections for that Element.

<u>Inquiry and Evaluation Considerations</u>: For each Element, the Handbook provides useful information that is intended to help the evaluator further understand the nature of the programmatic requirements and suggestions for how to go about determining their status within the organization being evaluated.

Information relates directly to the Tool's SOH Program Evaluation Criteria form which must be completed by the evaluator. Included are sections for:

- "*Documents and Records Review*": Provides examples of the sorts of documents and records to be solicited from the organization and reviewed by the evaluators.
- "*Potential Interviewees*": Lists examples of various positions in the organization that would likely provide good information related to the specific Element being evaluated.
- "*Potential Interview Questions*": Provides example questions to discuss with the Interviewees.
- "*Observations*": Identifies the types of physical observations that may help reflect the status of organization with respect to the Element in question. The evaluator should be on the lookout for these types of conditions or activities over the course of the evaluation.
- "*References*": Provides a listing of key resources and references with which the evaluator should be familiar.
- "*Ranking Criteria for this Element*": Provides suggestions for determining a quantitative 'score' for the various criteria indicated on the SOH Program Evaluation Criteria form. Considerations are given which help the evaluator decide the status of organization's SOH program with respect to rankings of "Outstanding", "Exceeds", "Mostly Met", "Partially Met", and "Not Present".

<u>SOH Program Evaluation Criteria form</u>: This form is from the Department of Interior's *Safety and Occupational Health Program Evaluation Tool*. The respective form for each of the Elements has been provided for reference. The completion of these forms in an accurate, consistent, and meaningful way is a primary goal of the SOH evaluation. The information on these forms serves to identify SOH program strengths and weaknesses and helps DOI decision-makers determine where to focus finite resources to ensure a safe and healthy workplace.

This Handbook is simply intended to be a guide. It is up to the evaluator to decide the best approach for conducting the evaluation at hand and identifying and using any information in this Handbook that might be helpful. It is anticipated that this Handbook will be refined and updated over time in order to benefit from the experience of users performing SOH evaluations throughout the Department. In that light, any and all constructive comments are welcome.

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 1: Leadership and Management

Public Law 91-596 requires the Secretary as well as the head of each bureau and office to furnish their employees with places of employment that are free from recognized hazards that are causing or could cause death or serious physical harm. This is a requirement that has been reinterpreted over time to include protecting employees from all workplace hazards that could cause them harm or disrupt the continuity of operations, not just those that are serious. Most senior leaders at DOI value employee safety and health; however, they are faced with a number of challenges on a daily basis and can tend to focus on issues rather than outcomes. Occupational safety and health (OSH) hazards and concerns can be less obvious to senior managers because they may stem from longstanding workplace practices or conditions or do not tend to be issues requiring their immediate attention. This makes it easier for senior management to defer actions and assume OSH needs are being met, at least for the present.

However, only senior managers can ensure that safety becomes and is maintained as an organizational value and part of the bureau or office's culture. Therefore, ongoing senior management engagement in the OSH program is really crucial for long-term success. Senior managers should also define the expected level of participation of managers and supervisors at other levels in the organization.

Senior management's core beliefs about OSH are transferred through their policies, procedures, and oversight to the organization as a whole. Through delegation, Safety Managers are responsible for helping implement senior management's OSH policies and procedures and running day-to-day program activities. With the proper authorities, Safety Managers can assume 'on-the ground' roles that senior leadership is unlikely to fulfill and which are fundamental to advancing organizational objectives. Overall, successful OSH programs rely on effective leadership and management and require a consistent, reinforcing commitment by senior management and Safety Managers in order to:

- Visibly support the program and lead by example;
- Reinforce safety in their presentations, meetings, and briefings;
- Adopt the correct program indicators and milestones for measuring OSH program performance;
- Provide adequate support and funding to their OSH program;
- Hold their subordinate managers accountable for employee safety and health; and
- Ensure that safety and health processes are fully integrated into the bureau/office's core business functions.

The best OSH programs successfully integrate sound safety and health policies and practices into all workplace activities, supervision, and management. The bureau/office safety and health program will be less successful if it is managed independent from the management of routine business. Senior managers should establish a template that incorporates safety and health management systems into the bureau/office management process at all levels of the organization. Safety should be treated just like any other important part of the bureau/office's business and should be incorporated into the performance measurement process as well.

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 1: Leadership and Management

(i) Management Commitment, Involvement and Communication

Senior leadership in the bureaus and offices must be committed to, and visibly support, the OSH program in order for it to succeed. They must also provide the motivating force that ensures an effective program and communicate the importance of occupational health and safety to all. If a cultural shift is necessary to institute or maintain the OSH program, then it is essential that support, commitment, and communication be consistently provided from the very top to everyone in the organization including all levels of management, employees and their union representatives.

Individual program manager involvement is instrumental to the success of the program; however, managers often have varying levels of commitment to employee occupational health and safety. For the less-than-enthusiastic manger, safety can seem like just another in a long list of tasks, or worse, a burden. Employee occupational health and safety programs can be less than successful under this kind of leadership. These managers may need additional oversight, management systems, or technical support to carry out their occupational health and safety responsibilities and institute OSH as a core value in their organization.

(1) <u>Documents and Records Review:</u>

(a) Occupational safety and health (OSH) policy documents issued by bureau and regional managers to provide insight into the level of management commitment to the program and the level of program implementation.
(b) Program goal documents, such as SHARE goals, provide insight into the level of management's involvement in the program and how well goals are communicated.
(c) Safety and health performance elements to demonstrate the level of development the safety and health program has undergone.
(d) OSH awards programs to indicate the level at which management recognizes and rewards positive performance.
(e) VPP applications to include information about the program, how it is implemented and managed. VPP applications are also good indicators of management commitment to the program and indicate places with strong employee participation.
(f) Records promoting the OSH program to include the Director's annual commitment statement and any other documents created by supervisors or managers.
(g) SHARE records to provide indicators of safety and health program performance.
(h) Injury and illness records, including OSHA 301/300 records and other statistical information collected by the bureau/office and to provide indicators of program performance.
(i) Workers' compensation cost information and return-to-work programs that show how well injured workers are restored to employment provide an indication of the vitality of the program. Coordination with the safety staff is a good indicator of management's support of injury prevention by using all information streams in their injury prevention efforts.

(j) Senior managers and safety committee members' safety and health training and education records to show whether the required training has been provided in a timely manner. The quality of the record kept will also indicate managements' emphasis on safety training generally

(k) "Tool box" safety briefings minutes provide records of safety and health briefings given by the bureau or office at any level in their organizations. These will indicate strong and weak areas of safety and health program implementation.

(2) <u>Potential Interviewees:</u>

(a) *Bureau/Office Director* will offer an opportunity to learn how involved/committed the head of the organization is to employee safety and health.

(b) *Bureau/Office DASHO* should have a high level understanding of the organization's safety and health program and the program performance. The DASHO should also be able to explain any issues related to program implementation.

(c) *Mid and higher level managers* will be able to discuss the program's implementation in the areas they are responsible for. They should also be able to discuss accident trends, overall inspection results, and employee participation opportunities.

(d) *Supervisors* should be able to clearly articulate their safety and health responsibilities, policy guidance they have received from above, and how they handle the day-to-day operation of the program.

(e) *Employees* should be able to explain bureau/office policies and how they are communicated.

(f) *Personnel assigned to implement and maintain OSH program* should be able to discuss the origin of organizational policies, their dissemination and implementation. They should also be able to discuss the success and failure of various policies promulgated by the bureau or office.

(3) <u>Potential Interview Questions:</u>

(a) When did management last participate in the safety and health program?

(b) Are safety and health issues regularly included on the agendas of management and operational meetings?

(c) Does management follow all safety rules?

(d) Does management give visible support to the safety and health efforts of others?

(e) Do managers participate in the significant aspects of the safety and health program (i.e., site inspections, accident reviews, and program evaluations)?

(f) Do managers have safety and health incorporated into their performance reviews?

(g) Are workplaces free of recognized hazards?

(h) Do employees follow the safety and health rules of the bureau or office?

(i) Do employees use safety equipment provided by the bureau or office?

(j) Are supervisors held accountable for the safety and health of their employees?

(k) Have managers established and communicated safety and health goals and expectations?

(l) Does the bureau/office timely submit the required supporting material for the annual report to OSHA?

(m) Does the bureau or office conduct self evaluations of their safety and health program?

(4) <u>Observations:</u>

(a) *Safety and Occupational posters, posted memos and policy statements.* Posters, policy statements and important safety and health memos should be clearly posted in a location

accessible to all employees. They should be current, up to date, and, when required, signed by the appropriate authority. Employees working in the area should be able to tell the evaluator where these documents are located.

(b) *Knowledge of SHARE and bureau/office's performance.* At a minimum, all managers should be aware of the SHARE initiative. In order to manage their safety and health responsibilities effectively, supervisors should also have knowledge of SHARE, and use the statistical information to improve performance

(c) *OSH awards.* The bureau/office should have some sort of awards program to recognize and encourage positive behavior. Conversely, there should be some sort of program to manage negative behavior as well.

(d) *Attitude.* Attitude, combined with performance statistics are good indicators of the level of management support and safety and health program implementation in the organization.

(5) <u>References:</u>

Public Law 91-596, Section 19(a) It shall be the responsibility of the head of each Federal agency to establish and maintain an effective and comprehensive occupational safety and health program which is consistent with the standards promulgated under section 6.

Executive Order 12196 -The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

29 CFR 1960.11 Each agency head shall ensure that any performance evaluation of any management official in charge of an establishment, any supervisory employee, or other appropriate management official, measures that employee's performance in meeting requirements of the agency occupational safety and health program, consistent with the employee's assigned responsibilities and authority, and taking into consideration any applicable regulations of the Office of Personnel Management or other appropriate authority. The recognition of superior performance in discharging safety and health responsibilities by an individual or group should be encouraged and noted.

29 CFR 1960.9 Employees who exercise supervisory functions shall, to the extent of their authority, furnish employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm. They shall also comply with the occupational safety and health standards applicable to their agency and with all rules, regulations and orders issued by the head of the agency with respect to the agency occupational safety and health program.

29 CFR 1960.10(a) Each employee shall comply with the standards, rules, regulations and orders issued by his/her agency in accordance with section 19 of the Act, Executive Order 12196, and this part which are applicable to his/her own actions and conduct.

29 CFR 1960.10(b) Employees shall use safety equipment, personal protective equipment, and other devices and procedures provided or directed by the agency and necessary for their protection.

29 CFR 1960.71(a) The Act and E.O. 12196 require all Federal agency heads to submit to the Secretary an annual report on their agency's occupational safety and health program, containing such information as the Secretary prescribes.

29 CFR 1960.71(a)(1) Each agency must submit to the Secretary by January 1 of each year a report describing the agency's occupational safety and health program of the previous fiscal year and objectives for the current fiscal year. The report shall include a summary of the agency's self-evaluation findings as required by § 1960.78(b).

(6) <u>Ranking Criteria for this Element:</u>

(a) *Outstanding.* Safety and health issues are regularly included on agendas of management operations meetings. Bureau management clearly demonstrates—by involvement, support, and example—the primary importance of safety and health for everyone at their worksites. Performance is consistent and sustained or has improved over time. The bureau has a viable workers' compensation program. *If the evaluation of this element indicates this is the case, rate this element as a 5*.

(b) *Exceeds.* Management participates in significant aspects of the safety and health program, such as site inspections, incident reviews, and program reviews. Managers monitor the workers' compensation program and use the information to better manage their safety and health performance. Management practices gain and maintain support for the occupational health and safety program at all levels within the bureau. Incentive programs may be present. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Management follows appropriate safety and health rules, and gives visible support to the safety and health efforts of others. Managers and supervisors are held accountable for the safety and health of their employees. *If the evaluation of this element indicates this is the case, rate this element as a 3*.

(d) *Partially Met.* Management sets and communicates safety and health policy and goals, but remains detached from all other safety and health efforts. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present*. Management demonstrates no policy, goals, objectives, or interest in safety and health issues at this worksite. *If the evaluation of this element indicates this is the case, rate this element as a 1*.

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 1. Leadership and Management

Assessed Element: (i) Commitment, Involvement and Communication

OHS Section Goal(s): Leadership and management demonstrate visible support, commitment and provide a motivating force for an effective safety and health program. Leadership and management communicate safety and health values throughout the Bureau.

Recommended Performance Metric(s): Safety topics at senior management meetings. Current safety and health policy. Effective communication tools.

Interviewees: DASHO, mid and higher level managers, Supervisors, Employees and Personnel assigned to implement and maintain OHS program.
Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.
Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-SMIS Injury/Illness records/analysis -OHS policy documents -SHARE goal documents -Safety and health performance elements
-OHS awards programs -SHARE records -Workers' comp. cost information and return-to-work programs
-Senior managers/safety committee members training and education records -"Tool Box" safety briefings minutes
-VPP applications - Records promoting the OHS program

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Does management participate in the program? _____
2. Are safety and health issues regularly included on agendas of management and operational meetings? _____
3. Does management follow all safety and health rules? _____
4. Do leaders and managers give visible support to the safety and health efforts of others? _____
5. Does management participate in significant aspects of the safety and health program, such as site inspections, accidents, program reviews? _____
6. Is safety and health a performance standard for managers and supervisors? _____
7. Are managers and supervisors held accountable for the safety and occupational health of their employees? _____ How?
8. Has management established and communicated safety and health goals/objectives? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 1: Leadership and Management

(ii) Responsibility and Accountability

Leadership of the bureau/office must communicate and demonstrate that safety and health is the responsibility of everyone from senior management to hourly employees and that everyone will be held accountable for effectively meeting the OSH needs of their organization. Senior management must be responsible for designating an appropriate level of authority to line managers and other subordinates to implement the OHS program and provide adequate implementation tools and resources. Managers and supervisors must implement senior management's policies and hold staff accountable to program objectives for a safe and healthful work environment.

Organizations with sound OSH programs reflect an ingrained safety culture where responsibilities are not overly concentrated on the safety and health staff but are integrated across the entire organizational structure. Bureaus/ offices must be able to show that responsibilities for safety and health are clearly communicated to and understood by managers, supervisors, employees, contractors, vendors, etc. Every employee should be able to describe his/her role within the OHS program and understand the benefits derived from fulfilling these responsibilities as well as the adverse impacts that may result when such responsibilities are not met.

(1) <u>Documents and Records Review</u>:

(a) Documents designating various positions with safety and health duties and responsibilities. These should reflect the written programs, goals, objectives, etc. of the bureau or office.
(b) OHS–related programs, manuals and management systems - These include the written OHS standard operating procedures, "vision statements", ISO policies (if applicable), etc.
(c) Qualifications required for OHS staff.
(d) Organizational chart, budgets and job descriptions that show how authority and responsibility is distributed in the bureau or office.
(e) Performance evaluations showing specific safety and health criteria for all line managers, supervisors and hourly employees.
(f) Training records of managers, supervisors, and OHS staff and committee.
(g) OHS-related excerpts from executive meeting minutes.
(h) OHS Committee meeting minutes.
(i) Performance metrics and reports showing measures of progress towards safety and health objectives.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss how authorities and responsibilities are integrated into position descriptions. They should also be able to identify how safety and health performance impacts decisions made about compensation, career advancement, and performance ratings.

(b) *Supervisors* should be able to convey how responsibilities for safety and health are applied on a daily basis in their assigned area. Supervisors can explain how safety and health responsibilities are taken into consideration during performance evaluations.
(c) *OHS staff* should be able to discuss from a very practical standpoint how OHS-related authorities and responsibilities are integrated throughout the organization and how objective, meaningful criteria are applied to performance evaluations.
(d) *Employees* should be able to discuss their roles, responsibilities, and authorities when it comes to OHS in their given area and how they are motivated to achieve positive results and held accountable through evaluations and work reviews.

(3) <u>Potential Interview Questions</u>:

(a) What are your responsibilities for ensuring safe and healthful working conditions in your area? How are you evaluated and held accountable?
(b) What methods are used to provide positive/negative reinforcement dealing with safety rules and work practices?
(c) What orientation and training have you received regarding your responsibilities for safety and health in your work area? Is it effective? Do you have authorities commensurate with your responsibilities?
(d) In your view, has the Secretary/Director appointed a Designated Agency Safety and Health Official (DASHO) with sufficient authority and responsibility to represent the bureau interests and support of the agency's occupational safety and health program?
(e) Does the safety and health staff of bureau/office headquarters report to (or otherwise have direct access to) the DASHO?
(f) Does the bureau provide adequate budgets and staffs to implement the OHS program at all operational levels?
(g) Do managers and supervisors have the responsibility to plan for necessary safety and health staff, equipment, materials, and training? Do they have the authority to implement their plans and secure the necessary funds and resources?
(h) Does bureau management assign overall responsibility for implementing site safety and health programs to line managers?
(i) Do line managers have authority to direct abatement of hazards that can be corrected without major capital expenditure?
(j) Do management representatives have some expertise in hazard recognition and applicable OSHA requirements?

(4) <u>Observations</u>:

(a) *Safety and Occupational posters, posted memos and policy statements.* Posters, policy statements and important safety and health memos should be clearly posted in a location accessible to all employees. They should be current, up to date, and, when required, signed by the appropriate authority. Employees working in the area should be able to tell the evaluator where these documents are located and how safety and health responsibilities are part of their work.
(b) *OHS awards.* The bureau/office should have some sort of awards program to recognize and encourage positive behavior. Conversely, there should be some sort of program to manage negative behavior as well.

(c) *Attitude.* Attitude, combined with performance statistics are good indicators of the level of management support and safety and health program implementation in the organization.

(5) <u>References</u>:

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

29 CFR 1960.8(a) The head of each agency shall furnish to each employee employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm.

29 CFR 1960.8(b) The head of each agency shall comply with the Occupational Safety and Health Administration standards applicable to the agency.

29 CFR 1960.8(c) The head of each agency shall develop, implement, and evaluate an occupational safety and health program in accordance with the requirements of section 19 of the Act, Executive Order 12196, and the basic program elements prescribed in this part, or approved alternate program elements.

29 CFR 1960.8(d) The head of each agency shall acquire, maintain, and require the use of approved personal protective equipment, approved safety equipment, and other devices necessary to protect employees.

29 CFR 1960.8(e) In order to provide essential specialized expertise, agency heads shall authorize safety and health personnel to utilize such expertise from whatever source available, including but not limited to other agencies, professional groups, consultants, universities, labor organizations, and safety and health committees.

29 CFR 1960.9 Employees who exercise supervisory functions shall, to the extent of their authority, furnish employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm. They shall also comply with the occupational safety and health standards applicable to their agency and with all rules, regulations and orders issued by the head of the agency with respect to the agency occupational safety and health program.

29 CFR 1960.10(a) Each employee shall comply with the standards, rules, regulations and orders issued by his/her agency in accordance with section 19 of the Act, Executive Order 12196, and this part which are applicable to his/her own actions and conduct.

29 CFR 1960.10(b) Employees shall use safety equipment, personal protective equipment, and other devices and procedures provided or directed by the agency and necessary for their protection.

29 CFR 1960.10(c) Employees shall have the right to report unsafe and unhealthful working conditions to appropriate officials.

29 CFR 1960.10(d) Employees shall be authorized official time to participate in the activities provided for in section 19 of the Act, Executive Order 12196, this part, and the agency occupational safety and health program.

OSHA Instruction FAP 2.1B June 19 1989 - Instructions for evaluation of Federal agency occupational safety and health programs.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Responsibility for safety and occupational health is clearly defined by top management and has been communicated in writing to all employees. A culture of safety is valued and evident throughout all levels of the organization. All employees are actively engaged in fostering a safe workplace for themselves and their coworkers and take personal responsibility and initiative. Managers and supervisors are delegated with appropriate levels of authorities commensurate with their responsibilities. Adequate funds and resources are provided to ensure an effective occupational safety and health program. All employees are provided orientation/training in their safety and occupational health roles and responsibilities within 45 days of employment. There is documented evidence that managers, supervisors, and employees are held accountable for safety and occupational health through a fair, consistent and unambiguous performance evaluation system. There is a award system in place. Safety goals and objectives are included in all performance evaluations. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Responsibility for safety and occupational health is defined by top management and has been communicated in writing to all employees. A culture of safety is valued and evident throughout the majority of the organization. Most employees are actively engaged in fostering a safe workplace and take personal responsibility and initiative. Managers and supervisors are delegated with appropriate levels of authorities commensurate with their responsibilities. Adequate funds and resources are provided. All employees are provided orientation/training in their safety and occupational health roles and responsibilities. Managers, supervisors, and employees are held accountable for the effectiveness of the OHS program. Safety goals and objectives are included in most performance evaluations. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Responsibility for safety and occupational health is defined by top management and has been effectively communicated, albeit not always in writing. A culture of safety is valued and embraced by the majority of the organization. Managers and supervisors have the responsibility to ensure an effective OHS program but do not always have the adequate authority or funding/resources to implement desired improvements in a timely manner. Most employees are eventually trained in their safety and occupational health responsibilities but this is not always a priority. Most managers, supervisors, and workers know what safety and occupational health performance is expected of them, and they understand how the system of incentives and adverse consequences affects them and their performance ratings. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Responsibility for safety and occupational health is defined by top management but is not widely shared with employees. Managers and supervisors often do not have the

responsibility, authority, or adequate resources to ensure an effective safety and occupational health program. Employee orientation on safety and occupational health responsibilities is not a priority. Many employees lack understanding of personal responsibility for keeping themselves, coworkers, and equipment free from mishaps. There is little, if any, incentive for employees or the organization as a whole to meet OHS performance standards. A safety culture is not being fostered. Many managers, supervisors, and workers do not know what safety and occupational health performance is expected of them, and they lack an understanding of the system or rewards and corrections associated with evaluation of performance. Safety goals and objectives are not consistently addressed in performance evaluations. In general, the management systems for OHS-related responsibilities and accountabilities are not well defined, established, or implemented. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* Responsibility for safety and occupational health is not well defined by top management. Managers, supervisors, and workers do not know what safety and occupational health performance is expected of them. Safety and occupational health responsibility is not spread throughout the organization. There is no documented evidence that mangers, supervisors, and employees (hourly) are held accountable for safety and occupational health. There are no rewards in place if performance standards are met. Safety goals and objectives are not included in performance evaluations. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 2. Leadership and Management

Assessed Element: (ii) Responsibility and Accountability

OHS Section Goal: Top management shall provide leadership and assume overall responsibilities for: (a) Implementing, maintaining, and monitoring performance of the OHSMS; (b) Providing appropriate financial, human, and organizational resources to plan, implement, operate, check, correct, and review the OHSMS; (c) Defining roles, assigning responsibilities, establishing accountability, and delegating authority to implement an effective OHSMS for continual improvement; and (d) Integrating the OHSMS into the organization's other business systems and processes. Employees shall assume responsibility for aspects of health and safety over which they have control, including adherence to the organization's health and safety rules and requirements.

Recommended Performance Metric(s): Written policies are in place and implemented

Interviewees: Managers, Supervisors, Employees and OHS staff

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance.

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Documents designating various positions with S&H duties and responsibilities
-Organization chart, budgets, and job descriptions
-OHS excerpts from executive meeting minutes,
-Meetings
-OHS program/ manual
-Qualifications for OHS staff
-Manager, Supervisor, OHS staff and Committee training records
-OHS committee meetings minutes
-Verification of S&H authority at appropriate levels

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Has the Secretary/Director appointed a Designated Agency Safety and Health Official (DASHO) with sufficient authority and responsibility to represent the Bureau interest and support of the agency's occupational safety and health program? _____
2. Do Bureau/offices safety and health headquarters staff report directly to, or have appropriate access to, the Designated Agency Safety and Health Official, in order to carry out the responsibilities under this part? _____
3. Does the Bureau provide adequate budgets and staffs to implement the occupational safety and health program at all operational levels? _____
4. Are managers and supervisors delegated at each appropriate level with sufficient authority and responsibility to plan for and assure funds for necessary safety and health staff, equipment, materials, and training required to ensure an effective occupational safety and health program? _____
5. Does bureau management assign overall responsibility for implementing site safety and health programs to line managers? _____
6. Do line managers have authority to direct abatement of hazards that can be corrected without major capital expenditure?
7. Do management representatives have some expertise in hazard recognition and applicable OSHA requirements? _____
8. Does the organizational structure facilitate open communication across their organization and especially between managers and safety staffs in the field and at their national office? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 1: Leadership and Management

(iii) Financial Resources

Commitment to a fully-functioning safety and occupational health program requires that management adequately fund the program with financial and capital equipment resources. Funds are necessary for sufficient staffing, space, equipment, training, and special contingencies (emergencies, etc.). Without adequate financial resources, staff cannot perform their tasks responsibly and the safety and occupational health program cannot be administered effectively. The organization's budget and capital expenditures plan must reflect input from safety and occupational health personnel.

(1) <u>Documents and Records Review</u>:

(a) Documented budgeting processes that a bureau has implemented to identify OHS program needs and commensurate costs.
(b) Records which reflect the effectiveness of the existing OHS program (e.g., evaluations of conformance to DOI's OHS regulations, mandates, and goals) and identify problem areas which may stem from a lack of financial resources (e.g., root cause investigations pointing to lack of resources as a cause of a mishap).
(c) Budget and expense reports; Green Book submittals; and abatement costs.
(d) Where capital expenditures are not adequate due to budget constraints, documented evidence that bona fide attempts have been made to improve the capital expenditure budget in order to improve safety and health relating to conditions and equipment.
(e) Reports of backlogs in preventative maintenance or hazard correction activities due to lack of resources.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the specifics of their available financial resources, how they are allocated, budget consistency from year to year, and the rationale behind any significant OHS budget increases/decreases and how such changes affected OHS effectiveness.
(b) *Supervisors* should be able to discuss how resources are used to administer the program.
(c) *OHS staff* should be able to provide details about their role in implementing the program as well as the adequacy of resources (past, present and future).
(d) *Employees* should be able to explain how they are provided the opportunity to provide input with regards to the budget, PPE, etc., and whether it appears that adequate financial resources are brought to bear for the OHS program.

(3) <u>Potential Interview Questions</u>:

(a) Does the Secretary/Director ensure that the agency budget submission includes appropriate funds for effective implementation and administration of the agency's occupational safety and health program?
(b) For Supervisors, has upper management consistently provided adequate funding for safety and health programs?
(c) Do line managers have authority to order/purchase safety and health equipment?
(d) Are safety supplies provided/available when they are needed, e.g. personal protective equipment?
(e) Describe the adequacy of the financial resources and capital expenditures for occupational safety and health. Are special and emergency needs anticipated and addressed in the OHS budget?

(4) <u>Observations</u>:

(a) Investigators should make a physical inspection of areas, operations and facilities where workplace activities/conditions can be witnessed. Emphasis should be placed on observing safety and occupational health equipment supply areas (first aid areas, PPE, etc.) to determine if adequate resources appear to be available.

(5) <u>References</u>:

29 CFR 1960.7(a) The head of each agency shall ensure that the agency budget submission includes appropriate financial and other resources to effectively implement and administer the agency's occupational safety and health program.

29 CFR 1960.7(b) The Designated Agency Safety and Health Official, management officials in charge of each establishment, safety and health officials at all appropriate levels, and other management officials shall be responsible for planning, requesting resources, implementing, and evaluating the occupational safety and health program budget in accordance with the regulations of the Office of Management and Budget Circular A-11 (sections 13.2(f) and 13.5(f) and other relevant documents.

29 CFR 1960.7(c) Appropriate resources for an agency's occupational safety and health program shall include, but not be limited to:

1960.7(c)(1) Sufficient personnel to implement and administer the program at all levels, including necessary administrative costs such as training, travel, and personal protective equipment;

1960.7(c)(2) Abatement of unsafe or unhealthful working conditions related to agency operations or facilities;

1960.7(c)(3) Safety and health sampling, testing, and diagnostic and analytical tools and

1960.7(c)(4) Any necessary contracts to identify, analyze, or evaluate unsafe or unhealthful working conditions and operations;

1960.7(c)(5) Program promotional costs such as publications, posters, or films; and

1960.7(c)(6) Technical information, documents, books, standards, codes, periodicals, and publications.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Management provides resources to all responsible parties so that assigned responsibilities can be met. Financial records reflect liberal funding for the safety and occupational health programs and allows for fluctuations in need and contingencies. There is an effective process in place and employees are aware of the process for acquiring necessary equipment and supplies. Repairs and maintenance related to safety are fully funded and completed on time indicating fully sufficient resources. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Management provides resources to responsible parties so that assigned responsibilities can be met. Financial records reflect adequate funding for safety and occupational health programs. Employees are aware of the process for acquiring necessary equipment and supplies. Repairs and maintenance related to safety are adequately funded. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Management provides resources to responsible parties so that assigned responsibilities can be met. Financial records reflect adequate funding for safety and occupational health programs but some delays or inadequacies in obtaining resources have been reported. Most, but not all, employees are aware of the process for acquiring necessary equipment and supplies. Repairs and maintenance related to safety are generally funded without delay. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Management provides resources to responsible parties so that most but not all assigned responsibilities can be met. Financial records reflect some funding for safety and occupational health programs but resources/funding fluctuate and are often difficult to obtain in a timely manner. Few employees are aware of the process for acquiring necessary equipment and supplies. Repairs and maintenance are sometimes deferred due to funding issues. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* Management does not appear to provide adequate resources to responsible parties, so that assigned responsibilities can be met. Financial records reflect inadequate funding for safety and occupational health programs. OHS budgets fluctuate significantly over time without good risk-based rationale. Employees are not aware of the process for acquiring necessary equipment and supplies. Repairs and maintenance are often deferred due to funding issues. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 1. Leadership and Management
Assessed Element: (iii) Financial Resources
OHS Section Goal(s): Employee safety and health is adequately resourced.
Recommended Performance Metric(s): Safety and health input in budget formulation; Adequacy of resources to implement and administer the program
Interviewees: Managers, Supervisors, Employees and OHS staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed; -Budget and Expense Reports; Green Book Submittals; Abatement Costs
Processes/Evaluation Criteria: (Rank 1-5) 1. Does the Secretary/Director ensure that the agency budget submission includes appropriate funds for effective implement and administer the agency's occupational safety and health program? _____ 2. Does the final budget actually reflect program requirements? _____ 3. Do line managers have authority to order/purchase safety and health equipment? _____ 4. Are safety offices provided the resources goods and services (i.e., Safety and health sampling, testing, and diagnostic and analytical tools and equipment, including laboratory analyses, etc.) _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 1: Leadership and Management

(iv) Personnel Resources (Size and Technical Skills of Staff)

Management must commit to assembling and maintaining adequate personnel resources for workplace safety and occupational health. Personnel must be readily available in sufficient numbers and have the requisite skills, training, and authorities to accomplish assigned responsibilities and to perform necessary tasks commensurate with the hazards potentially present in the workplace. A safety and occupational health staff may need to be periodically supplemented with temporary/part time resources such as certified safety professionals (CSP), certified industrial hygienists (CIH), licensed health care professionals, consultants, and other subject matter experts, as needed.

(1) <u>Documents and Records Review</u>:

(a) Budgets and other records that reflect the personnel resources utilized to fulfill OHS requirements currently and in the past.

(b) Evidence that personnel assigned with the responsibility for ensuring a safe and healthful workplace have full authority to shut down operations or equipment and order maintenance when necessary, are adequate in numbers and coverage, and are properly credentialed and/or trained to carry out assigned responsibilities. Such records may include organizational charts, position descriptions, employee manuals, training records, and position recruitment postings/records.

(c) Records that show safety and health staff have adequate equipment and technical resources to carry out their responsibilities. Such records might include safety equipment inventories, technical journal subscriptions, etc.).

(d) Evidence OHS resources have been in place and working effectively for a significant period of time (i.e., at least one year).

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the policies, guidelines, and rationale related to staffing OHS personnel based on the workplace facilities, operations, hazards, conditions at hand, and OHS-related requirements.

(b) *Supervisors* should be able to clearly articulate the staffing requirements and whether sufficient trained and credentialed OHS personnel are available.

(c) *OHS staff* should be able to provide their assessment of how effective they are in implementing OHS policies and whether staffing levels are adequate to meet the needs of the agency or bureau (i.e., employees, contractors, visitors, and public).

(d) *Employees* should be able to discuss how well the OHS staff meets the needs of their workplace, whether OHS staff, equipment and other resources are available in a timely manner to address their concerns, how frequently OHS inspections are performed, and how timely and effectively identified hazards are corrected.

(3) <u>Potential Interview Questions</u>:

(a) Has senior management provided adequate personnel resources for the OHS program?
(b) Is supplemental technical support or resources ever needed? If so, is this support readily available?
(c) Describe your sense of the overall adequacy of the OHS budget, personnel (including size and caliber of staff, training, space, and OHS equipment.
(d) What types of credentialing or training programs are available to the OHS staff? Are professional staff adequately credentialed, e.g., CIH, CSP, accredited inspectors (asbestos, lead, etc.)? Are OHS staff positions looked upon as desirable in terms of compensation, promotion opportunities, etc.?
(e) Are Collateral Duty Safety Officers (CDSO) adequately trained in a timely manner?
(f) Are OHS staff "out in the field" enough or too frequently just at their desks?
(g) Is there continuity in the safety program? How promptly are OHS staff vacancies filled?
(h) Are there sufficient personnel to implement and administer the program at all levels?
(i) How frequently are outside OHS resources needed (FOH, NIOSH, contractors, etc.)? Are they readily available?
(j) How are general employees involved in safety and health activities? For example, do they have input with regard to PPE, etc.?

(4) <u>Observations</u>:

(a) Does the OHS staff seem to have the equipment and other resources to conduct assigned tasks?
(b) Does the OHS staff appear confident in carrying out their assigned tasks?
(c) Are OHS observed in the field (performing inspections, training, etc.) or are they largely at their desks?

(5) <u>References</u>:

29 CFR 1960.56(a) Each agency shall provide occupational safety and health training for safety and health specialists through courses, laboratory experiences, field study, and other formal learning experiences to prepare them to perform the necessary technical monitoring, consulting, testing, inspecting, designing, and other tasks related to program development and implementation, as well as hazard recognition, evaluation and control, equipment and facility design, standards, analysis of accident, injury, and illness data, and other related tasks.

29 CFR 1960.56(b) Each agency shall implement career development programs for their occupational safety and health specialists to enable the staff to meet present and future program needs of the agency.

29 CFR 1960.57 Each agency shall provide training for safety and health inspectors with respect to appropriate standards, and the use of appropriate equipment and testing procedures necessary to identify and evaluate hazards and suggest general abatement procedures during or following their assigned inspections, as well as preparation of reports and other documentation to support the inspection findings.

29 CFR 1960.7(a) The head of each agency shall ensure that the agency budget submission includes appropriate financial and other resources to effectively implement and administer the agency's occupational safety and health program.

29 CFR 1960.7(b) The Designated Agency Safety and Health Official, management officials in charge of each establishment, safety and health officials at all appropriate levels, and other management officials shall be responsible for planning, requesting resources, implementing, and evaluating the occupational safety and health program budget in accordance with the regulations of the Office of Management and Budget Circular A-11 (sections 13.2(f) and 13.5(f) and other relevant documents.

29 CFR 1960.7(c) Appropriate resources for an agency's occupational safety and health program shall include, but not be limited to:

1960.7(c)(1) Sufficient personnel to implement and administer the program at all levels, including necessary administrative costs such as training, travel, and personal protective equipment;

1960.7(c)(2) Abatement of unsafe or unhealthful working conditions related to agency operations or facilities;

1960.7(c)(3) Safety and health sampling, testing, and diagnostic and analytical tools and

1960.7(c)(4) Any necessary contracts to identify, analyze, or evaluate unsafe or unhealthful working conditions and operations;

1960.7(c)(5) Program promotional costs such as publications, posters, or films; and

1960.7(c)(6) Technical information, documents, books, standards, codes, periodicals, and publications.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding*. Management provides excellent resources to the OHS staff and assigned responsibilities can be met in full. OHS staff has adequate time, equipment, and supplemental resources to meet even peak demands for hazard assessments, training, and corrective actions. Staff is qualified and highly trained and professional development is encouraged and supported. Continual improvement in the OHS program is evident. Employees are afforded the time to receive OHS-related training and information. Professional development and credentialing are encouraged. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Management provides adequate resources to the OHS staff and assigned responsibilities can be met in full. OHS staff has the time, equipment, and supplemental resources to perform hazard assessments, training, and corrective actions. Staff is adequately trained and professional development is offered. Employees are afforded the time to receive OHS-related training and information. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* OHS staff resources are sometimes scarce but assigned responsibilities can generally be met. OHS staff usually has the time, equipment, and supplemental resources to perform hazard

assessments, training, and corrective actions but peak workloads or unanticipated circumstances are not easily addressed. Staff is lacking some necessary credentials. Employees are afforded limited time to receive OHS-related training and information. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* OHS staff resources are sometimes scarce but assigned responsibilities can generally be met. OHS staff usually has the time, equipment, and supplemental resources to perform hazard assessments, training, and corrective actions but peak workloads or unanticipated circumstances are not easily addressed. Staff is lacking some necessary credentials and training. Employees are afforded limited time to receive OHS-related training and information. OHS staff are not able to get out into the field enough due to other priorities and collateral duties. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* Adequate OHS resources are not present and the assigned responsibilities of the OHS staff are often not met. Time, equipment, and people are frequently not available to perform workplace inspections, hazard characterizations, accident investigations, employee safety training or other necessary OHS duties. Reports of unsafe acts and injury and illnesses are increasing. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 1. Leadership and Management
Assessed Element: (iv) Personnel Resources (Size and Technical Skill of Staff)
OHS Section Goal: Staffing is sufficient for mission
Recommended Associated Performance Metric(s): Personnel ratios per numbers of employees, professional staff credentialing
Interviewees: Managers, Supervisors, Employees and OHS staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe-efficient/unsafe-inefficient activities are witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Is professional staff credentialed? _____ 2. Are Collateral Duty Safety Officers (CDSO) adequately trained in a timely manner? _____ 3. Is there succession planning in the safety program? _____ 4. Sufficient personnel to implement and administer the program at all levels? _____ 5. Have other resources been used (FOH, NIOSH, Contractors', etc.)? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 1: Leadership and Management

(v) Policy

A policy on establishing and maintaining safe and healthful working conditions is the foundation of an effective OHS program. It communicates the value placed on safety and occupational health in the organization, and if it is understood and carried out by everyone, it helps enable sound decisions affecting all safety and health matters in the workplace.

The organization should be able to demonstrate that there is a clear, written OHS policy that covers all workplace conditions, operations, and employees. This policy should be communicated to employees at all levels, as well as to contractors and visitors, so that everyone in the bureau or agency understands the priority safety and health takes in relation to other organizational values.

The policy should be signed by the highest appropriate manager demonstrating that it represents senior management's commitment to the safety and health program. The policy should be reviewed and updated at least annually.

(1) <u>Documents and Records Review</u>:

(a) OHS policy manuals, procedures, 'vision' statements (issued in the last three years).
(b) Emails, memos, articles, and notifications regarding the safety and health program.
(c) Audio-visual presentations about the safety and health program.
(d) OSHA programs, records, and logs, as required.
(e) New employee orientation manual.
(f) Safety and health policy postings (e.g., on bulletin boards, intranets/websites, and posters).
(g) Weekly safety briefing documents.
(h) Education/training documents.
(i) Bureau or office safety and occupational health action plans

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to identify and discuss the key elements of the OHS policy and how the policy is communicated and implemented throughout the workplace.
(b) *Supervisors* should be able to clearly articulate their OHS responsibilities under the policy and how effectively the policy is implemented on a day-to-day basis.
(c) *OHS staff* should be able to provide details about their role in implementing the policy and their assessment of how well the policy meets the needs of their workplace (i.e., employees, contractors, visitors, and public).
(d) *OHS committee members* should be able to discuss the OHS policy from their respective perspectives, current OHS challenges being faced in the workplace, and what policy-related steps are being taken to overcome those challenges.
(e) *Employees and union representatives* should be able to explain the OHS policy, how it is communicate to them, and give examples of how the policy affects them on a daily basis.

(f) *Contractors* should be able to explain, at least in general terms, the OHS policy and identity how it relates to their activities on the worksite.

(3) <u>Potential Interview Questions</u>:

(a) How do you perceive safety and occupational health is valued in the organization in relation to quality, production, sales and other organizational values?

(b) What are the key elements of the organization's safety and occupational health policy and how do these elements affect you and your associates?

(c) How are employees and contractors initially introduced to the policy? (For example, posted at front entrance? Presented in the employee training manual?) Is the policy communicated and reiterated on a regular or ongoing basis?

(d) As part of a policy of continual improvement, are employees aware that the OHS management system is in process of being assessed and enhanced (e.g., using the Safety and Occupational Program Evaluation tool)? What suggestions do you have for improving the OHS policy and its implementation?

(4) <u>Observations</u>:

(a) The investigator should tour the workplace to determine if safety and health policy statements are posted in places where they can be easily observed by employees and others. Examples of posted statements might include:

> "Safety and health in our organization must be a part of every operation. Without question, safety and health is every employee's responsibility at all levels."
>
> "We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody the proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisors and employees, but also between employees and their co-workers. Only through such a cooperative effort can an effective safety and health program be established and preserved."
>
> "The safety and health of every employee is a high priority. Management accepts responsibility for providing a safe working environment and employees are expected to take responsibility for performing work in accordance with safe standards and practices. Safety and health will only be achieved through teamwork. Everyone must join together in promoting safety and health and taking every reasonable measure to assure safe working conditions in the organization."

(5) <u>References</u>:

Public Law 91-596, Section 19(a) It shall be the responsibility of the head of each Federal agency to establish and maintain an effective and comprehensive occupational safety and health program which is consistent with the standards promulgated under section 6.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

29 CFR 1960.6(a) The head of each agency shall designate an official with sufficient authority and responsibility to represent effectively the interest and support of the agency head in the management and administration of the agency occupational safety and health program. This Designated Agency Safety and Health Official should be of the rank of Assistant Secretary, or of equivalent rank, or equivalent degree of responsibility, and shall have sufficient headquarters staff with the necessary training and experience. The headquarters staff should report directly to, or have appropriate access to, the Designated Agency Safety and Health Official, in order to carry out the responsibilities under this part.

29 CFR 1960.6(b) The Designated Agency Safety and Health Official shall assist the agency head in establishing:

1960.6(b)(1) An agency occupational safety and health policy and program to carry out the provisions of section 19 of the Act, Executive Order 12196, and this part;
1960.6(b)(2) An organization, including provision for the designation of safety and health officials at appropriate levels, with adequate budgets and staffs to implement the occupational safety and health program at all operational levels;
1960.6(b)(3) A set of procedures that ensures effective implementation of the agency policy and program as required by section 19 of the Act, Executive Order 12196, and the program elements of this part, considering the mission, size, and organization of the agency.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* The bureau or office has a clearly stated policy on maintaining a safe and healthful work environment for all. The policy encompasses all necessary elements. It is effective in meeting the needs of the organization. The policy has been communicated to all employees and, as necessary, volunteers and there is evidence that it is understood by all. The OHS policy is at least equal in priority to other organizational values. A policy statement is signed by the highest appropriate manager within the organization and has been updated in the last 12 months. The bureau/office's goal of continuous OHS improvement and participation in the Occupational Health and Safety Program Evaluation has been communicated to all personnel in the organization. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* The bureau/office has a clearly stated policy on maintaining a safe and healthful work environment. The policy is fairly specific and encompasses most if not all necessary elements. It is generally effective in meeting the needs of the organization. The policy has been communicated to most employees and volunteers and there is evidence that it is generally understood. The OHS policy is at least equal in priority to other organizational values. A policy letter is signed by the highest appropriate manager within the organization and has been updated in the last 24 months. The bureau/office's goal of continuous OHS improvement and participation in the Safety and Occupational Health Program Evaluation has been

communicated to most personnel in the organization. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* The bureau/office has a policy on maintaining a safe and healthful work environment. The policy is fairly general. It encompasses most but not all of the necessary policy elements. It is generally effective in meeting the needs of the organization, but some gaps exist. The policy has been communicated to employees and volunteers, but there is evidence that not everyone is familiar with it or that it is not always adequately understood. The OHS policy may not be construed as being on par with other organizational values. The policy is signed by the highest appropriate manager within the organization and has been updated in the last 24 months. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* The bureau/office has a policy on maintaining a safe and healthful work environment but it is general and lacks adequate specificity for the workplace in question. It encompasses some but not all of the necessary policy elements. The policy has important gaps which appear to result in an overall weakness in the OHS program and/or its implementation. There is evidence that not everyone is familiar with the policy and that it is not adequately understood by a significant number of employees. The OHS policy is not really construed as being on par with other organizational values. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* The bureau/office's policy on maintaining a safe and healthful work environment for all is non-existent or significantly lacking. Few are aware of any OHS-related policies. It is apparent that operations are conducted largely without the benefit of OHS policies. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 1. Leadership and Management

Assessed Element: (v) Policy

OHS Section Goal(s): Safety and health policy establishes an overall sense of direction, sets the principles of action for the bureau and offices

Recommended Performance Metric(s): Policy is in place, current, and effectively communicated

Interviewees: Bureau managers, Supervisors, OHS staff, OHS committee members, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Written policies	- Notifications	- OSHA records as required	- OHS intranet site
- Emails, memos, articles, posters	- Audio-visual presentations	- Policy postings	- Policy (issued in last three years)
- Bulletin boards	- Posters	- Website review	-Education/training documents
-Records that demonstrate that safety and health policies have been communicated to employees			-Agency or region safety and health internet sites

Processes/Evaluation Criteria: (Rank 1-5)

1. Is the safety and health policy is current? _____
2. Is the safety and health policy comprehensive? _____
3. Does the safety and health policy address hazards identification/effective risk management practices? _____
4. Is the safety and health policy successfully communicated in terms of desired scope, detail and expected outcomes? _____
5. Does the Bureau DASHO effectively communicate policy needs to Bureau leadership? _____
6. Does the Bureau DASHO in concert with Bureau leadership carry out policy requirements? _____
7. Does the policy statement incorporate the health and well being of both employees and the public; with emphasis placed on efficient operations with a minimum of accidents and losses; and loss control is integrated into all operations? _____
8. Does the policy commit to the protection and continual improvement of employee safety and health; effective employee participation; conformance with departmental safety and health requirements, and compliance with laws and regulations? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 1: Leadership and Management

(vi) Program Promotion and Recognition

Successes in meeting safety objectives by an individual, team and bureau/office should be recognized and promoted internally across the organization. Recognizing and rewarding good safety performance promotes desirable safety practices and reinforces the involvement and commitment of senior leadership in the health and safety program. All employees should clearly understand the organization's objectives for meeting safety standards and these objectives should be reflected in their performance goals. Senior management must be directly involved in setting the standards and should participate in encouraging and rewarding employees for demonstrating adherence to the desired practices. The recognition of OSH successes and the promotion of effective programs are excellent ways to share best practices throughout an organization.

(1) <u>Documents and Records Review</u>:

(a) New employee and contractor orientation materials, Safety Week, and internal newsletters and websites where the OHS program may be mentioned.
(b) Written awards program with criteria indicating how safety and health performance is recognized and rewarded.
(c) Tool box talks - Records of occupational health and safety briefings given by the bureau or office at any level in their organizations.
(d) Budget and expense reports to verify that financial resources have been allotted to a promotion and recognition program.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the elements of the OHS recognition program, including the criteria used to reward employees and promote recognition, budget, frequency of awards, forums used, etc.
(b) *Supervisors* should be able to discuss their role in how decisions are made about who get recognition and identify who in their organization has been given an award/recognition.
(c) *OHS staff* should be able to provide details about their role in promoting the OHS in the workplace and if/how it is currently being used to advance ongoing OHS priorities.
(d) *Employees and union representatives* should be able to discuss how meaningful the organization's OHS program is perceived to be in terms of effectively contributing to eliminating recognized hazards in the workplace. Also, they should be able to discuss how the OHS-related awards program contributes to making their job safer and cite specific instances when positive performance was recognized.
(e) *Committee members* can discuss what they do to promote the OHS program and provide examples of how employees have been rewarded for safety and health accomplishments.
(f) *Human Resources Directors* can discuss how salary adjustments and bonuses are used to incentivize OSH performance.

(g) *Bureau Awards Coordinators* can discuss how performance awards are used to incentivize OSH performance.

(3) <u>Potential Interview Questions</u>:

(a) Does the bureau or office recognize and promote good OHS performance?
(b) Has the bureau or office established and implemented a formal awards program?
(c) How is it determined when awards or recognition is provided to an employee or group of employees?
(d) Are OHS objectives promoted in newsletters, at meetings, via websites?
(e) Are there specific OHS program goals and objectives currently tied to the promise of awards or recognition?
(f) Are adequate financial resources available for OHS program awards and recognition?
(g) Is senior management visibly involved in the OHS recognition program?
(h) Is OHS promoted effectively in a manner that ultimately fosters positive behaviors and a safer workplace?
(i) Do supervisors and managers have an employee safety element in their performance strandards?

(4) <u>Observations</u>:

(a) *Posters and policy statements*. OHS-related posters and policy statements are current and clearly posted in readily accessible locations.
(b) *Accolades and Certificates.* Employees display their OHS-related accolades (plaques, memos) and training course certificates.
(c) *Attitude*. Managers, supervisors, and employees appear engaged in meeting occupational health and safety performance standards and motivated by the award and recognition program.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Instructions for evaluation of Federal agency occupational safety and health programs.

Department of Interior Departmental Manual - 485 DM Chapter 10 Safety Management Awards.

29 CFR 1960.11 Each agency head shall ensure that any performance evaluation of any management official in charge of an establishment, any supervisory employee, or other appropriate management official, measures that employee's performance in meeting requirements of the agency occupational health and safety program, consistent with the employee's assigned responsibilities and authority, and taking into consideration any applicable regulations of the Office of Personnel Management or other appropriate authority. The recognition of superior performance in

discharging occupational health and safety responsibilities by an individual or group should be encouraged and noted.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* The bureau or office has established and implemented an awards/recognition program designed to advance specific OHS objectives, or utilizes existing awards programs to recognize safety achievement. Senior leadership visibly supports and encourages the program and is involved in presenting awards and providing recognition. Overall, OHS performance is recognized as a critical component of employee's duties and accolades are provided for achievements on a regular basis. The awards/recognition program is seen by all as a real and effective means of fostering safety at their workplaces. Adequate budgetary resources are consistently available. System has been in place for more than a year. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* The bureau or office has an awards/recognition program that advances OHS objectives, or utilizes existing awards programs to recognize safety achievement. Senior leadership visibly supports and encourages the program and is often involved in presenting awards and providing recognition. Overall, OHS performance is recognized as a main component of employee's duties and accolades are provided on a regular basis. The awards/recognition program is seen by most as an effective means of fostering safety. Adequate budgetary resources are consistently available. System has been in place for at least a year. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* The bureau or office has an awards/recognition program that advances general OHS objectives. Senior leadership supports the program but is not often involved in providing recognition. OHS performance is recognized as part of an employee's duties but accolades for stellar performance are not provided on a regular basis. The awards/recognition program is seen by most as an effective means of fostering safety. Adequate budgetary resources are usually available. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* The bureau or office has established an awards and recognition program for meeting OHS objectives but it is not really tied to priorities. Most employees are not aware of the program and it really doesn't serve to positively motivate OHS compliance. Senior leadership is not usually involved in promoting the program or providing employee recognition. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* The bureau or office has no established OHS awards program and safety is not effectively promoted. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 1. Leadership and Management
Assessed Element: (vi) Program Promotion and Recognition
OHS Section Goal: Establishment of a safety and health awards and recognition process that involves senior managers and promotes desirable performance and safe behaviors at all organizational levels
Recommended Performance Metric(s): Bureau has a performance based awards program with set criteria
Interviewees: Committee Representatives, Bureau managers, Supervisors, Employees and Union representatives **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Has the Bureau/Offices established an awards program? ____ 2. Has the Bureau/Offices established criteria for the awards program? ____ 3. Has the Bureau/Offices implemented its award program? ____ 4. Does the Bureau/Offices recognize and promote safety and health performance? ____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 2: Employee Involvement

While management needs to provide the structure and leadership for an effective OHS program, employees should be involved in its development, implementation, operation, and evaluation. Through direct and meaningful participation employees can develop a sense of ownership in the program which can then translate into a demonstrable commitment to occupational health and safety for themselves and their fellow workers.

Employee involvement does not diminish the responsibility of the employer (management) for occupational health and safety in the workplace. OSHA clearly places responsibility for employee safety and health on the employer. A program that fully integrates employees into the system does, however, better equip them with the skills to recognize potential hazards and help implement necessary protective controls before problems arise. Employees generally have the most at stake should uncontrolled hazards exist on the job as well as the most intimate understanding of work processes and the work environment.

Management needs to ensure that the OHS program encompasses all workplace areas and classifications of employees. Means of employee participation can be varied, and may include labor-management committees, safety committees, accident review boards, contributors to safe work rules and job hazard analyses, “tool box” safety talk leaders, etc.

Effective participation by employees clearly has its benefits and management must create and sustain a culture that fosters such involvement. Employees must be protected from harassment and other punitive actions when participating in the program or when reporting on unsafe work conditions. Any fear of reprisals or ridicule will quickly eliminate all well-intentioned efforts to integrate the employee perspective into the OHS program. Strong OHS programs require an environment that supports and encourages employees to become stakeholders in the process and its outcomes.

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 2: Employee Involvement

(i) Safety Committees and Councils

Safety committees provide an excellent means for employees to contribute to their OHS program and help make sure it serves the priorities of workplace as they see them. Committees may exist at different levels within the organization (e.g., Bureau-wide, field and regional offices, specific workplace, etc.) but should work in concert to the extent necessary to advance common goals. By participating on safety committees, employees are engaged directly with leadership in setting OHS goals, identifying and making recommendations regarding job safety issues, developing occupational health and safety training objectives, and ensuring that the work environment is free of hazards. A well-run safety committee comprised of motivated individuals from diverse backgrounds and positions in the organization can foster an OHS program more responsive to the needs of employees, a better decision-making process, and quicker, more effective implementation of necessary workplace improvements. Also, to realize exemption from unannounced OSHA inspections, an agency must form a committee at the national level and at any establishment or grouping of establishments that is to be exempt, keeping the Secretary advised of the locations and activities where such committees are functioning.

(1) <u>Documents and Records Review</u>:

(a) Charter, charge, composition, and budget of the bureau/office safety committee.
(b) List of safety committee members, including their roles in the organization and on the committee and any prior experience in workplace safety evaluation and hazard mitigation.
(c) Minutes of the safety committee meetings and any subcommittees for at least the past 12 months, including meeting attendance records.
(d) Records of training and orientation for safety committee members.
(e) Records that indicate committee members are allowed to observe or assist in accident investigations and have access to relevant safety and health data.
(f) Memos, logs, suggestion box submissions, or other means used by employees to bring the safety committee's attention to a particular issue.
(g) Human resource policies regarding participation on safety committee (compensation for time spent, special indemnifications, etc.)
(h) Union agreements and bargaining unit records as pertains to safety committees.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the role safety committees play in promoting workplace safety and health, how members are selected for participation, key issues currently being addressed by the safety committee, and to what extent the committee's work influences management decisions.
(b) *Committee members* can discuss the frequency of meetings, what duties the committee performs, key issues addressed by the committee (past and present), who is represented on the

committee (management, employees, union representatives, etc.), what records and resources they have access to, and how they are trained.

(c) *Employees and union representatives* should be able to discuss how effective the safety committee is in meeting the OHS needs of the workplace, how accessible and responsive the committee is to requests and input, and whether the committee is viewed as a viable means for ensuring a workplace free of recognized hazards.

(3) <u>Potential Interview Questions</u>:

(a) For safety committee members:

- How frequently does the committee meet?
- How are you notified of meetings?
- Are you encouraged to attend meetings?
- What activities does the committee perform (routine and non-routine)?
- What records can the committee access?
- What resources are available to the committee? Are these sufficient?
- What training was required to be on the committee? Is there a budget for on-going professional development for committee members?
- Who takes the minutes of the meetings and how do you get access to those minutes?
- How does the committee 'keep in touch' with issues across the entire workplace in question?
- Can you describe the committee's role (if any) in the handling of reports of safety and health problems from workers?
- What role does the committee have in the process used for employees to report of safety and health problems, issue tracking, corrective action verification, etc.
- What were the main safety committee issues over the past year? Did the committee adequately deal with these issues?
- How stable is the safety committee? What is the turn-over rate?
- Has the committee made suggestions to management for safety and health improvements? If yes, give examples and discuss outcomes.
- Do you think that leadership has been responsive to suggestions the committee has offered?
- Is the committee adequately supported by management?

(b) For management:

- What organizational groups are represented on the committee?
- How are members selected?
- Does the committee have a written charter and is it functioning to the charter?
- What incentives are there for employees to participate in the safety committee?
- How does the committee work with management to address safety and health concerns?

(c) For employees:

- Are you aware of the safety committee? What is its role? Is it fulfilling its role?
- Are you encouraged to participate on the committee? Have you or would you serve on the committee? Why?
- How would you contact the committee with an OHS-related issue that was important to you? Would you have confidence that your concern would be addressed in a timely and effective manner?

- Do you receive notice of safety committee meetings and do you have access to the minutes of the safety committee?

(4) <u>Observations</u>:

(a) Notices of safety committee meetings are posted in visible locations.
(b) Results of safety committee initiatives (as identified from interviews and documents) are apparent.
(c) Notices to encourage employee participation on safety committee are evident.
(d) Employees and managers used the word "we" rather than "they" when describing the OSH program and actions taken to eliminate worksite hazards.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 – Instructions for evaluation of Federal agency occupational safety and health programs.

Department of Interior Departmental Manual - Chapter 2 Responsibilities

Department of Interior Departmental Manual - Chapter 9 Department Safety and Occupational Health Councils, Committees and Working Groups

29 CFR 1960.36 Occupational Safety and Health Committees. General provisions.

29 CFR 1960.36(a) The occupational safety and health committees described in this subpart are organized and maintained basically to monitor and assist an agency's safety and health program. These committees assist agencies to maintain an open channel of communication between employees and management concerning safety and health matters in agency workplaces. The committees provide a method by which employees can utilize their knowledge of workplace operations to assist agency management to improve policies, conditions, and practices.

29 CFR 1960.36(b) Agencies may elect to establish safety and health committees meeting the minimum requirements contained in this subpart. Where such committees are not established or fail to meet the minimum requirements established by the Secretary, the Secretary is authorized by section 1-401(i) of Executive Order 12196 to conduct unannounced inspections of agency workplaces when the Secretary determines them necessary.

29 CFR 1960.37 Occupational Safety and Health Committees. Committee organization.

29 CFR 1960.37(a) For agencies which elect to utilize committee concept, safety and health committees shall be formed at both the national level and, for agencies with field or regional

offices, at appropriate levels within the agency. To realize exemption from unannounced OSHA inspections, an agency must form a committee at the national level and at any establishment of grouping of establishments that is to be exempt, keeping the Secretary advised of the locations and activities where such committees are functioning.

29 CFR 1960.37(b) Committees shall have equal representation of management and non-management employees, who shall be members of record.
29 CFR 1960.37(c) Committee members should serve overlapping terms. Such terms should be of at least two years duration, except when the committee is initially organized.

29 CFR 1960.37(d) The committee chairperson shall be nominated from among the committee's members and shall be elected by the committee members. Management and nonmanagement members should alternate in this position. Maximum service time as chairperson should be two consecutive years.

29 CFR 1960.37(e) Committees shall establish a regular schedule of meetings and special meetings shall be held as necessary; establishment level committees shall meet at least quarterly and national committees shall meet at least annually.

29 CFR 1960.37(f) Adequate advance notice of committee meetings shall be furnished to employees and each meeting shall be conducted pursuant to a prepared agenda.

29 CFR 1960.37(g) Written minutes of each committee meeting shall be maintained and distributed to each committee member, and upon request, shall be made available to employees and to the Secretary.

29 CFR 1960.38 Occupational Health and Safety Committees. Committee formation.

29 CFR 1960.38(a) Upon forming such committees, heads of agencies shall submit information to the Secretary concerning the existence, location, and coverage, in terms of establishments and populations, of such committees, certifying to the Secretary that such committees meet the requirements of this subpart. The information submitted should include the name and telephone numbers of the chairperson of each committee, and should be updated annually as part of the annual report required by 1960.74 to reflect any changes that may have occurred.

29 CFR 1960.38(b) If, upon evaluation, the Secretary determines that the operations of a committee do not meet the requirements of this subpart, the Secretary shall notify the agency and identify the deficiencies to be remedied. If the agency does not satisfy the Secretary within 90 days that the committee meets the requirements of this subpart, the committee shall not be deemed a committee under Executive Order 12196 and this part.

29 CFR 1960.39 Occupational Health and Safety Committees. Agency responsibilities.

29 CFR 1960.39(a) Agencies shall make available to committees all agency information relevant and necessary to their duties, except where prohibited by law. Examples of such

information include, but are not limited to: The agency's safety and health policies and program; human and financial resources available to implement the program; accident, injury, and illness data; epidemiological data; employee exposure monitoring data; Material Safety Data Sheets; inspection reports; reprisal investigation reports; abatement plans; NIOSH hazard evaluation reports; and internal and external evaluation reports.

29 CFR 1960.39(b) Agencies shall provide all committee members appropriate training as required by subpart H of this part.29 CFR 1960.39

29 CFR 1960.40 Occupational Health and Safety Committees. Establishment committee duties.

29 CFR 1960.40(a) The safety and health committee is an integral part of the safety and health program, and helps ensure effective implementation of the program at the establishment level.

29 CFR 1960.40(b) An establishment committee formed under this subpart shall, except where prohibited by law:

29 CFR 1960.40(b)(1) Monitor and assist the safety and health program at establishments under its jurisdiction and make recommendations to the official in charge on the operation of the program;
29 CFR 1960.40(b)(2) Monitor findings and reports of workplace inspections to confirm that appropriate corrective measures are implemented;
29 CFR 1960.40(b)(3) When requested by the agency Safety and Health Official, or when the committee deems it necessary for effective monitoring of agency establishment inspection procedures, participate in inspections of the establishment;
29 CFR 1960.40(b)(4) Review internal and external evaluation reports and make recommendations concerning the establishment safety and health program;
29 CFR 1960.40(b)(5) Review, and recommend changes, as appropriate, to procedures for handling safety and health suggestions and recommendations from employees;
29 CFR 1960.40(b)(6) When requested by the Designated Agency Safety and Health Official, or when the committee deems it necessary, comment on standards proposed pursuant to the provisions of Subpart C of this part;
29 CFR 1960.40(b)(7) Monitor and recommend changes, as required, in the level of resources allocated and spent on the establishment safety and health program;
29 CFR 1960.40(b)(8) Review agency responses to reports of hazardous conditions, safety and health program deficiencies, and allegations of reprisal;
29 CFR 1960.40(b)(9) Report their dissatisfaction to the Secretary if half a committee determines there are deficiencies in the establishment's safety and health program or is not satisfied with the agency's reports of reprisal investigations; and
29 CFR 1960.40(b)(10) Request the Secretary to conduct an evaluation or inspection if half the members of record are not satisfied with an agency's response to a report of hazardous working conditions.

29 CFR 1960.41 Occupational Health and Safety Committees. National committee duties.

29 CFR 1960.41(a) Monitor performance of the agency safety and health program and make policy recommendations to the head of the agency on the operation of the program

29 CFR 1960.41(b) Monitor and assist in the development and operation of the agency's establishment committees. As the committee deems appropriate, monitor and review: Reports of inspections; internal and external evaluation reports; agency safety and health training programs; proposed agency standards; agency plans for abating hazards; and responses to reports of hazardous conditions; safety and health program deficiencies; and allegations of reprisal;

29 CFR 1960.41(c) Monitor and recommend changes in the resources allocated to the entire agency safety and health program;

29 CFR 1960.41(d) Report their dissatisfaction to the Secretary if half a committee determines there are deficiencies in the agency's safety and health program or is not satisfied with the agency's reports of reprisal investigations; and

29 CFR 1960.41(e) Request the Secretary to conduct an evaluation or inspection if half the members of record are not satisfied with an agency's response to a report of hazardous working conditions.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* There are safety committees and councils with written charters and clearly defined responsibilities. Meetings are held at least regularly in accordance with charters and minutes are kept and distributed. Committee membership is appropriately representative of management, employees, and the various other organizations. Employees are engaged and lead the committee direction. Open channels of communication are apparent between management and the committee and between the committee and employees throughout the workplace. Committee members have access to records, logs, investigations, and other statistics and documents related to the OHS program. Members have appropriate skills, training and experience in recognizing, evaluating and controlling hazards in all workplaces covered by the committee. Committees are provided with adequate time, professional development, equipment, on-site technical support, and any other resources required to perform their functions adequately. There is ample evidence that the committee is addressing issues in a meaningful, timely and effective manner. The committee has been in place for more than one year. Councils are in place and management is adequately represented. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* There are safety committees and councils with a written charters and well defined responsibilities. Meetings are held and minutes are kept and distributed. Membership is generally representative of management, employees, and the various other organizations. Open channels of communication exist between management and the committee and between the committee and employees throughout virtually all of the workplace. Committee members have access to records, logs, investigations, and other statistics and documents related to the OHS

program. Members have appropriate skills, training and experience in recognizing, evaluating and controlling hazards in virtually all workplaces governed by the committee. Committees are provided with adequate time, professional development, equipment, on-site technical support, and any other resources required to perform their functions adequately. Councils are in place and management is adequately represented. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* There is a safety committee with defined responsibilities but the charter is somewhat deficient in establishing in written roles and organizational requirements. Meetings are held routinely but are often cancelled or re-scheduled due to other priorities among the members. Membership is not particularly representative of management, employees, and the all various workplace organizations. Channels of communication are not always in place between management and the committee or between the committee and employees. Committee members have incomplete access to records, logs, investigations, and other statistics and documents related to the OHS program. Members have the adequate skills, training and experience in recognizing, evaluating and controlling hazards in most but not all of the workplaces governed by the committee. There is evidence that some issues taken by the committee were not addressed in a meaningful, timely and effective manner. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* There is a safety committee, but its purpose and levels of authority are not adequately defined. An inadequate process exists for selecting members and the committee does not adequately represent the organizational levels and various operations comprising the workplace. Employees are generally aware of the existence of the committee but cannot identify its role or meaningful actions that it has taken. Committee members are provided with limited resources to perform their functions adequately. There is no formal training and orientation for new committee members and membership rarely rotates. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* There is no safety committee or, if there is, it does little to advance the OHS goals of the organization. Meetings are not regularly held and few employees are aware of the committee's existence. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 2. Employee Participation

Assessed Element: (i) Safety Committees

OHS Section Goal: Employees/employee representatives are involved in the development and implementation of Program activities as demonstrated by: (a) employee participation on safety committees; (b) committee charters include, communication with organizational management; (c) involvement in hazard mitigation; (d) promote safety and health activities and (e) providing recommendation for program improvements.

Recommended Performance Metric(s): Where committees exist, functioning appropriately and contributing to the mission.

Interviewees: Committee Representatives, Bureau managers, Supervisors, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

- Bureau OHS procedures
- Human resource policies
- Injury reporting procedures
- Union agreements
- OHS meetings
- Job briefings
- OHS committee meetings
- Operations inspections
- Workplace records
- Employee suggestions

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

- OHS committee rosters and meeting minutes
- Employee notices of unsafe and unhealthful conditions
- Bargaining unit records
- SMIS records-Bureau or regional meetings

Processes/Evaluation Criteria: (Rank 1-5)

1. Does the committee have a charter and functioning to the charter? _____
2. Are occupational safety and health committees established to monitor and assist the Bureau's safety and health program and maintain open channel of communication between employees and management concerning safety and health matters in bureau workplaces? _____
3. Are committees formed at the appropriate level? _____
4. Do committees have appropriate representation of management and non-management employees, who are members of record? _____
5. Where some employees of an establishment are covered under collective bargaining arrangements and others are not, are members representative of both groups? _____
6. Are committee members rotated periodically? _____
7. Do Committees establish a regular schedule of meetings and special meetings held as necessary? _____
8. Is adequate advance notice of committee meetings furnished, and are minutes of the meetings published? _____
9. Does the Bureau provide the resources (time, travel, training, meeting space, etc.) for the committee to function? _____
10. Does the agency or facility encourage participation of management employees in Federal Safety and Health Councils? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 2: Employee Involvement

(ii) Program Involvement

Employee involvement in the OHS program provides the means by which workers individually and collectively contribute to the management systems necessary to maintain a workplace free of recognized hazards. An effective OHS program requires the involvement of stakeholders at all organizational levels so that decisions affecting health and safety can be made with the input of those who best understand the workplace, the operations conducted, and the affected employees.

Evidence of employee involvement in the OHS program can take a number of forms. For example, in addition to participation on safety committees (see Component 2.ii. Safety Committees), employees can: (1) inspect the workplace facilities for hazards and recommend correction actions; (2) perform job hazard analyses and develop safe work procedures; (3) help develop or revise general rules for safe work; (4) train newly hired employees in safe work procedures and/or train co-workers in revised safe work procedures; (5) contribute to 'tool box' safety talks and presentation at safety meetings; and (6) assist in accident investigations. In all cases, employees must have the right to notify appropriate managers of hazardous conditions and practices, and to be able to do so without fear of reprisal.

An effective OHS program fosters widespread employee involvement. Virtually all employees should be involved to some degree in advancing the OHS goals in their workplace. Similarly, no operations, groups, or facilities should be underrepresented or lack participation in the OHS.

(1) <u>Documents and Records Review</u>:

(a) New employee orientation manual, handouts, and presentations or other documents that introduce employees to the OHS program.
(b) Human resource policies on employee orientation and training and, in particular, participation in OHS programs.
(c) Employee orientation and training schedules and records of attendance.
(d) Memos, logs, suggestion box submissions, or other means used by employees to bring the safety committee's attention to a particular issue.
(e) Union agreements and bargaining unit records as they pertain to participation in OHS programs.
(f) Accident/incident investigation and hazard identification reports that identify the process followed for reporting and resolving situations.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss how employees are encouraged to participate in the structure and operation of the OHS program and how the human resource policies support that participation.

(b) *Supervisors* should be able to convey how employees are provided with an orientation to the OHS program, how employees are scheduled to participate in the program and how training is provided.
(c) *OHS staff* should be able to identify ways that management encourages and involves employees in the structure and operation of the safety and health program.
(d) *Employees* should be able to explain if they received an orientation to the OHS program, how they are involved in the program (citing specific examples), and to what degree management supports their involvement.

(3) <u>Potential Interview Questions</u>:

(a) In what ways can employees become involved and participate in the OHS program?
(b) How are employees encouraged to participate in the OHS program? How difficult is it to become involved?
(c) Are employees provided an adequate amount of time (with compensation) for participation in OHS program activities?
(d) Do employees feel like they are an effective part of the OHS program and that management listens to their ideas and input?
(e) Is there a 'new employee' orientation and if yes, when do employees receive that orientation? Does the orientation cover the OHS program?
(f) What are the bureau's or office's procedures for reporting unsafe or unhealthful working conditions? Can such reports be made anonymously and without fear of reprisal?
(g) What safety and health information is readily available to the employees?
(h) Have the workers right to refuse or stop work that they reasonably believe involves imminent danger communicated and understood by employees and recognized by management?
(i) How do employees and management communicate regarding health and safety issues?
(j) What fraction of the employees are engaged in the OHS program in some manner (e.g., on the safety committee, report hazards, train co-workers is OHS-related procedures, etc.)? Are any organizational operations, groups, or facilities significantly less involved than the others? More involved? Why?

(4) <u>Observations</u>:

(a) Employees demonstrate a sense of ownership of the OHS program and speak about it in terms of "we" rather than "they".
(b) Employees are comfortable talking to the investigator about involvement in the OHS program.
(c) Posters, memos and other visible evidence that management encourages participation in the OHS program.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 – Instructions for evaluation of Federal agency occupational safety and health programs.

29 CFR Part 1960 - Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Management encourages and provides for employee involvement in the structure and operation of the OHS program through written policies regarding incentives for participation, compensation for time spent, and recognition of achievements. All employees receive a new employee orientation, including details of the OHS program, within 45 days of employment. There are multiple avenues of employee participation in the OHS program and most employees at all levels of the organization have participated in the OHS program in at least one meaningful way. There is no evidence of lack of participation by certain operations, groups, or facilities within the organization in question. Employees are comfortable talking about the OHS program and feel that their contributions are welcomed and valued. There is ample evidence that employee participation has had a demonstrable impact on the design and operation of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Management encourages and provides for employee involvement in the structure and operation of the OHS program through policies regarding incentives for participation, compensation for time spent, and recognition of achievements. Most employees receive a new employee orientation, including details of the OHS program, soon after they arrive. Most employees have participated in the OHS program in at least one meaningful way. Some operations, groups, or facilities within the organization participate in a fuller way than others but all see to it that their employees are involved. Employees feel that their contributions are welcomed and valued. There is evidence that employee participation has had a demonstrable impact on the design and operation of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Management allows employee involvement in the structure and operation of the OHS program although pro-active encouragement seems to be lacking. Employees receive a new employee orientation, including some details of the OHS program, but this orientation is not a priority as evidenced by occasional delays beyond 3 three months. Some employees have participated in the OHS program in at least one meaningful way but many have not. Most operations, groups, or facilities within the organization see to it that their employees are involved in fostering the OHS program but on an ad hoc basis. There is some but not much evidence that employee participation has had a demonstrable impact on the design and operation of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Management does not foster employee involvement in the structure and operation of the OHS program in any formal way. Employees receive a new employee orientation, including some details of the OHS program, but this orientation is not thorough and often late. Most employees have not participated in the OHS program in any meaningful way. Employees for a number of operations, groups, or facilities within the organization are not generally involved in the OHS program. There is little evidence that employee participation has

had a demonstrable impact on the design and operation of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* Management does not encourage or provide for employee involvement in the structure and operation of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 2. Employee Participation
Assessed Element: (ii) Program Involvement
OHS Section Goal: A demonstrated process that a) advises all employees of their S&H rights; b) promotes their involvement in the safety and health program and in reporting hazards; c) prohibits, by policy and actions, supervisory or employee reprisals for hazard reporting; and d) ensures an effective means to respond to, action, and mitigate workplace hazards.
Recommended Performance Metric(s): Required attendance of new employee orientation within 90 days
Interviewees: Managers, Supervisors, Employees and OHS staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Are employees authorized official time to participate in the OHS program activities? _____ 2. Is there new employee orientation covering the Bureau's occupational safety and health program? _____ 3. Is new employee orientation provided within 90 days? _____ 4. Does new employee orientation meet OSHA and Bureau requirements? _____ 5. What are the Bureau's procedures for reporting unsafe or unhealthful working conditions, procedures for reporting anonymously by employees? _____ 6. What are the Bureau's procedures for employees reporting allegations of reprisal due to participation in safety and/or health activities? _____ 7. Is safety and health information readily available to the employees? _____ 8. Are DOI/DOL safety and health posters located in conspicuous places and available to employees? _____ 9. Have the workers right to refuse or stop work that they reasonably believe involves imminent danger communicated and understood by employees and recognized by management? _____ 10. Is open communication across their organization encouraged, especially between employees and management? _____ 11. Opportunities for employees to participate in safety and health program activities? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 3: Hazard Recognition and Prevention

Recognition and reduction of worksite hazards to prevent injury or illness is the cornerstone of an effective OHS program. Through careful analysis, diligent oversight, employee involvement, and on-going monitoring, worksite hazards can be minimized or eliminated.

Controlling worksite hazards requires programs that identify, evaluate, and mitigate potential risks in a timely and effective manner. An organization with a sound OHS program will be able to demonstrate that comprehensive policies and procedures exist so that all worksites, jobs, equipment, and facilities are properly assessed to identify potential hazards that might threaten employee safety. Inspections should be conducted by competent and specially-trained experts with all the requisite skills to address the specific worksite and operations in question. Skills in industrial hygiene, safety, engineering, chemistry, management systems, and communication are among the qualifications which may be necessary in the individual or team performing the assessments. Any new work processes, jobs, equipment, facilities, or materials should be analyzed before start-up or use to ensure that risks are identified and controlled. In addition, as a proven means of recognizing hazards, procedures for tracking and trending injuries and illnesses over time must be in place to help uncover risks and detect patterns.

Once hazards are identified, an effective OHS program must have mechanisms in place to effectively control or eliminate them without delay. Recognized hazards must be addressed using a “hierarchy of controls” where engineering controls must be used when feasible and methods such as personal protective equipment used only if engineering controls cannot be. In all cases, corrective actions should be documented and monitored for effectiveness.

Employees often have the most direct view of potential hazards. Highly effective OHS programs formally and informally encourage employees to observe, document, and report potential hazards to management. Reports by employees must be provided a timely and meaningful response to validate their contribution to the OHS program and foster confidence in the system. Employees must feel secure when reporting hazards and should be allowed to do so anonymously and without fear of reprisal.

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Component 3: Hazard Recognition and Prevention

(i) Inspection, Identification and Prioritization of Deficiencies

An effective OHS management system ensures that the workplace is properly inspected so that any unsafe activities or conditions can be identified and corrected without delay. In addition to comprehensive baseline occupational health and safety worksite surveys, routine (periodic), and special inspections of worksites are necessary to ensure that previously undetected hazards are recognized, that changes in conditions and activities do not cause new or additional hazards, and that hazard controls remain in place and are effective. These inspections should be conducted on a routine basis and whenever appropriate based on factors such as new/changed operations or facilities, staff turnover, reports of injuries, illnesses or 'near misses', etc.

Written procedures and, as necessary, supplemental technical guidance should be in place that detail the system for conducting the inspections. The system should identify responsibilities and assignments, technical inspection protocols (where needed), provide a written record of findings (e.g., ineffective or missing engineering or PPE controls, noncompliance with regulations, etc.), and effectively track corrective actions through completion. In addition to identifying unsafe conditions and practices, the inspection process must also gather additional information as necessary for the prioritization, design, planning and implementation of the necessary corrective actions.

Competent persons who are trained in hazard recognition and safety and health inspection procedures should conduct the inspections, with representation from affected employees, as appropriate.

(1) <u>Documents and Records Review</u>:

(a) Written procedures or guidelines for conducting and documenting routine and on-going health and safety inspections, including the intervals at which the inspections will occur and any checklists/supplemental technical information that may be used.
(b) Written policies/procedures describing workplace hazard determinations (including industrial hygiene monitoring) such as those required when employees are assigned respiratory protection and other personal protection equipment (PPE).
(c) Selected inspection reports, corrective action lists, priority rankings, and hazard correction tracking reports.
(d) Evidence that personnel performing worksite inspections are qualified to recognize the types of workplace hazards pertinent to their areas.
(e) CA-1, CA-2 – Workers' compensation claim forms for job related injury/illness.
(f) Hazard notices
(g) Training documents to show that people conducting the inspections have been trained.
(h) Safety Management Information System (SMIS) reports which include information about inspections, industrial hygiene findings, near misses, etc.
(i) Workers' compensation program reports.

(j) Employee reports of unsafe and unhealthful conditions.
(k) Safety committee charter and minutes relating to workplace inspections.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should describe the rationale for and procedures of the hazard inspection process. They should be able to articulate their role in evaluating the identified hazards and how hazards are documented, tracked and abated.
(b) *Supervisors* should be able to clearly explain types of potential hazards that workers under their supervision may encounter. They should also be able to explain their role in the identification, prioritization, and control of these hazards.
(c) *OHS staff* should be able to provide details about their role in identification and control of hazards and what training they provide to employees involved in inspections.
(d) *Employees and Union Representatives* should be able to explain the types of potential hazards in their workplace, how they protect themselves, and their level of involvement in the inspection process. They can also share what level of training they have received for participation in the inspection process.
(e) *Facilities staff* can provide important insight into prevailing OSH concerns in a workplace, lessons learned from past mishaps, and ongoing OSH challenges.

(3) <u>Potential Interview Questions</u>:

(a) Are the OSHA required inspections conducted and documented? Are OSHA-required hazard determinations conducted when employees are assigned respirators and other PPE?
(b) What is the inspection schedule? Do inspections occur more frequently in areas where there is an increased risk of injury or illness?
(c) Are employee representatives provided the opportunity to participate in the inspections?
(d) Have you taken part in inspections? Do you believe them to be effective in identifying and correcting hazards and areas of noncompliance?
(e) What methodology is used for inspections (checklists, procedures, etc.)?
(f) What training is provided to personnel conducting the inspections? How is their competence determined and evaluated?
(g) What is the process for initiating a corrective action to abate an unsafe or unhealthful working condition?
(h) How are corrective actions documented, prioritized and reported?
(i) Where are hazard notices posted and for how long of time?
(j) Do you feel the workplace hazard inspection process is effective?
(k) What is done with inspection data? Are trend analyses conducted?
(l) Are there any concerns about reprisals if an unsafe activity or condition is reported?

(4) <u>Observations:</u>

(a) Workplace is free of obvious hazards.
(b) Hazard notices are visibly posted.
(c) Work is being performed to correct hazards.
(d) Safety checklists are current and complete.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 – Instructions for evaluation of Federal agency occupational safety and health programs.

Department of Interior Departmental Manual - Chapter 6 Inspections and Abatements.

29 CFR 1960.25(a) Executive Order 12196 requires that each agency utilize as inspectors "personnel with equipment and competence to recognize hazards." Inspections shall be conducted by inspectors qualified to recognize and evaluate hazards of the working environment and to suggest general abatement procedures. Safety and health specialists as defined in 1960.2(s), with experience and/or up-to-date training in occupational safety and health hazard recognition and evaluation are considered as meeting the qualifications of safety and health inspectors. For those working environments where there are less complex hazards, such safety and health specializations as cited above may not be required, but inspectors in such environments shall have sufficient documented training and/or experience in the safety and health hazards of the workplace involved to recognize and evaluate those particular hazards and to suggest general abatement procedures. All inspection personnel must be provided the equipment necessary to conduct a thorough inspection of the workplace involved.

29 CFR 1960.25(b) Each agency which has workplaces containing information classified in the interest of national security shall provide access to safety and health inspectors who have obtained the appropriate security clearance.

29 CFR 1960.25(c) All areas and operations of each workplace, including office operations.

29 CFR 1960.25(d) When situations arise involving multiple agencies' responsibilities for conditions affecting employee safety and health, coordination of inspection functions is encouraged.

29 CFR 1960.26(c)(1) The inspector shall, in writing, describe with particularity the procedures followed in the inspection and the findings which form the basis for the issuance of any Notice of Unsafe or Unhealthful Working Conditions.

29 CFR 1960.26(c)(2) Each agency shall establish a procedure for the prompt issuance of a Notice of Unsafe or Unhealthful Working Conditions. Such notices shall be issued not later than 15 days after completion of the inspections for safety violations or not later than 30 days for health violations. If there are compelling reasons why such notice cannot be issued within the 15 days or 30 days indicated, the persons described in paragraph (c)(2)(iii) of this section shall be informed of the reasons for the delay. Such procedures shall include the following:

> **1960.26(c)(2)(i)** Notices shall be in writing and shall describe with particularity the nature and degree of seriousness of the unsafe or unhealthful working condition, including a reference to the standard or other requirement involved;

1960.26(c)(2)(ii) the notice shall fix a reasonable time for the abatement of the unsafe or unhealthful working condition; and
1960.26(c)(2)(iii) a copy of the notice shall be sent to the official in charge of the workplace, the employee representative who participated in the closing conference, and/or the safety and health committee of the workplace, if any.

29 CFR 1960.26(c)(3) Upon receipt of any notice of an unsafe or unhealthful working condition, the official in charge of a workplace shall immediately post such notice, or copy thereof, unedited, except for reason of national security, at or near each place an unsafe or unhealthful working condition referred to in the notice exists or existed. In addition, a notice shall be posted if any special procedures are in effect. Where, because of the nature of the workplace operations, it is not practicable to post the notice at or near each such place, such notice shall be posted, unedited, except for reason of national security, in a prominent place where it will be readily observable by all affected employees. For example, where workplace activities are physically dispersed, the notice may be posted at the location to which employees report each day. Where employees do not primarily work at or report to a single location, the notice may be posted at the location from which the employees operate to carry out their activities.

29 CFR 1960.26(c)(4) Each notice of an unsafe or unhealthful working condition, or a copy thereof, shall remain posted until the unsafe or unhealthful working condition has been abated or for 3 working days whichever is later. A copy of the notice will be filed and maintained for a period of five years after abatement at the establishment and made available to the Secretary upon request.

29 CFR 1960.27(a) Safety and health inspectors shall be in charge of inspections and may interview any employee in private if the inspector deems it necessary. A representative of the official in charge of a workplace and a representative of employees shall be given an opportunity to accompany Safety and Health Inspectors during the physical inspection of any workplace, both to aid the inspection and to provide such representatives with more detailed knowledge of any existing or potential unsafe or unhealthful working condition. The representative of employees shall be selected by the employees. Additional representatives of the official in charge and additional representatives of employees may accompany the Safety and Health inspectors if it is determined by the inspector that such additional representatives will further aid the inspection. Different representatives of the employer and employees may be allowed to accompany the Inspector during each different phase of an inspection.

29 CFR 1960.27(b) Safety and health inspectors shall be authorized to deny the right of accompaniment under this section to any person whose participation interferes with a fair and orderly inspection.

29 CFR 1960.27(c) With regard to facilities classified in the interest of national security, only persons authorized to have access to such facilities shall be allowed to accompany a Safety and Health Inspector in such areas.

29 CFR 1960.27(d) Safety and health inspectors shall consult with employees concerning matters of occupational safety and health to the extent deemed necessary for the conduct of an effective

and thorough inspection. During the course of an inspection, any employee shall be afforded an opportunity to bring to the attention of the Safety and Health Inspector any unsafe or unhealthful working condition which the employee has reason to believe exists in the workplace.

29 CFR 1960.28(c) Any employee or representative of employees, who believes that an unsafe or unhealthful working condition exists in any workplace where such employee is employed, shall have the right and is encouraged to make a report of the unsafe or unhealthful working condition to an appropriate agency safety and health official and request an inspection of such workplace for this purpose. The report shall be reduced to writing either by the individual submitting the report or, in the case of an oral notification, by the above official or other person designated to receive the reports in the workplace. Any such report shall set forth grounds for the report and shall contain the name of the employee or representative of employees. Upon the request of the individual making such report, no person shall disclose the name of the individual making the report or the names of individual employees referred to in the report, to anyone other than authorized representatives of the Secretary. In the case of imminent danger situations, employees shall make reports by the most expeditious means available.

29 CFR 1960.28(d) Reports received by the agency.

> **1960.28(d)(1)** Each report of an existing or potential unsafe or unhealthful working condition should be recorded on a log maintained at the establishment. If an agency finds it inappropriate to maintain a log of written reports at the establishment level, it may avail itself of procedures set forth in 1960.71. A copy of each report received shall be sent to the appropriate establishment safety and health committee.
> **1960.28(d)(2)** A sequentially numbered case file, coded for identification, should be assigned for purposes of maintaining an accurate record of the report and the response thereto, As a minimum, each establishment's log should contain the following information: date, time, code/ reference/file number, location of condition, brief description of the condition, classification (imminent danger, serious or other), and date and nature of action taken.
> **1960.28(d)(3)** Executive Order 12196 requires that agency inspections be conducted within 24 hours for employee reports of imminent danger conditions, within three working days for potentially serious conditions, and within 20 working days for other than serious safety and health conditions. However, an inspection may not be necessary if, through normal management action and with prompt notification to employees and safety and health committees, the hazardous condition(s) identified can be abated immediately.
> **1960.28(d)(4)** An employee submitting a report of unsafe or unhealthful conditions shall be notified in writing within 15 days if the official receiving the report determines there are not reasonable grounds to believe such a hazard exists and does not plan to make an inspection based on such report. A copy of each such notification shall be provided by the agency to the appropriate certified safety and health committee, where established under Executive Order 12196. An agency's inspection or investigation report, if any, shall be made available to the employee making the report within 15 days after completion of the inspection, for safety violations or within 30 days for health violations, unless there are compelling reasons, and shall be made available to the Secretary or the Secretary's authorized representative on request.

29 CFR 1960.29(a) While all accidents should be investigated, including accidents involving property damage only, the extent of such investigation shall be reflective of the seriousness of the accident.

29 CFR 1960.29(b) In any case, each accident which results in a fatality or the hospitalization of three or more employees shall be investigated to determine the causal factors involved. Except to the extent necessary to protect employees and the public, evidence at the scene of an accident shall be left untouched until inspectors have an opportunity to examine it.

29 CFR 1960.29(c) Any information or evidence uncovered during accident investigations which would be of benefit in developing a new OSHA standard or in modifying or revoking an existing standard should be promptly transmitted to the Secretary.

29 CFR 1960.29(d) The investigative report of the accident shall include appropriate documentation on date, time, location, description of operations, description of accident, photographs, interviews of employees and witnesses, measurements, and other pertinent information. A copy of the investigative report required by this section shall be forwarded to the official in charge of the workplace, the appropriate safety and health committee, and the exclusive employee representative, if any. The investigative report shall be made available to the Secretary or his authorized representative on request.

29 CFR 1960.30(a) The agency shall ensure the prompt abatement of unsafe and unhealthful conditions. Where a Notice of an Unsafe or Unhealthful Working Condition has been issued, abatement shall be within the time set forth in the notice, or in accordance with the established abatement plan.

29 CFR 1960.30(b) The procedures for correcting unsafe or unhealthful working conditions shall include a follow-up, to the extent necessary, to determine whether the correction was made. If, upon the follow-up, it appears that the correction was not made, or was not carried out in accordance with an abatement plan prepared pursuant to paragraph (c) of this section, the official in charge of the establishment and the appropriate safety and health committee shall be notified of the failure to abate.

29 CFR 1960.30(c) The official in charge of the establishment shall promptly prepare an abatement plan with the appropriate participation of the establishment's Safety and Health Official or a designee, if in the judgment of the establishment official the abatement of an unsafe or unhealthful working condition will not be possible within 30 calendar days. Such plan shall contain an explanation of the circumstances of the delay in abatement, a proposed timetable for the abatement, and a summary of steps being taken in the interim to protect employees from being injured as a result of the unsafe or unhealthful working condition. A copy of the plan shall be sent to the safety and health committee, and, if no committee exists, to the representative of the employees. Any changes in an abatement plan will require the preparation of a new plan in accordance with the provisions of this section.

29 CFR 1960.30(d) When a hazard cannot be abated within the authority and resources of the official in charge of the establishment, that official shall request assistance from appropriate higher authority. The local safety and health official, any established committee and/or employee representatives, and all personnel subject to the hazard shall be advised of this action and of interim protective measures in effect, and shall be kept informed of subsequent progress on the abatement plan.

29 CFR 1960.30(e) When a hazard cannot be abated without assistance of the General Services Administration or other Federal lessor agency, the occupant agency shall act with the lesser agency to secure abatement. Procedures for coordination with the General Services Administration are contained in Subpart E of this part.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Daily informal walk through inspections are conducted by employees and supervisors. Employees are so aware of issues in their workplace they review their work periodically for hazards and either self correct or recommend abatement strategies to their supervisors. An effective system has been well established to identify and correct workplace health and safety hazards. A baseline comprehensive health and safety survey has been conducted and there is an on-going, proactive hazard inspection program in operation, with at least monthly inspections scheduled. Areas with potentially greater hazards are inspected at more frequent intervals than other areas. Written procedures define what is to be inspected and how to record and report findings. Nationally recognized procedures for all sampling, testing, analysis and assessment are used. A tracking system is used to monitor identified hazards through completion of all necessary corrective actions. All records are up to date and complete. Employees are involved in the inspection program and all personnel used in the inspections are appropriately trained in hazard recognition. Hazard notices are visible and easily identified. There is good rationale to prioritize corrective actions. Abatement plans and status reports are available to all employees. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* An effective system has been established to identify and correct workplace health and safety hazards. A baseline comprehensive health and safety survey has been conducted and there is an on-going, proactive hazard inspection program in operation, with periodic inspections scheduled. Areas with potentially greater hazards are inspected at more frequent intervals than other areas. Procedures exist which define what is to be inspected and how to record and report findings. A tracking system is used to monitor identified hazards through completion of all necessary corrective actions. Most records are up to date and complete. Employees are generally involved in the inspection program and are adequately trained in hazard recognition. There is good rationale to prioritize corrective actions. Abatement plans and status reports are available to all employees. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* A system has been established to identify and correct workplace health and safety hazards but it is not well defined or based on written policies/procedures. A baseline health and safety survey has been conducted but it did not address all operations/facilities or is outdated. There is an on-going hazard inspection program in operation but it is rather ad hoc with no set

inspection schedule. Areas with potentially greater hazards are inspected at more frequent intervals than other areas. Some procedures exist which define what is to be inspected and how to record and report findings. A tracking system is used to monitor identified hazards but it is sometimes incomplete or does not track through completion of all necessary corrective actions. Records are generally, but not always, up to date and complete. Employees are generally involved in the inspection program and are competent in hazard recognition although formal training is rare. There is rationale to prioritize corrective actions. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* The system to identify and correct workplace health and safety hazards is not well defined or based on written policies/procedures. A baseline health and safety survey has been conducted but it did not address all operations/facilities or is outdated. There is an on-going hazard inspection program for some (not all) activities and facilities but it is rather ad hoc with no set inspection schedule. Few procedures exist which define what is to be inspected and how to record and report findings. The tracking system used to monitor identified hazards is often incomplete or does not track through completion of all necessary corrective actions. Records are not always up to date or complete. Employees are not typically involved in the inspection program. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* No formal system exists to identify and correct workplace health and safety hazards. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: **3. Hazard Recognition and Prevention**

Assessed Element: (i) Inspection, Identification and Prioritization of Deficiencies

OHS Section Goal: An effective, proactive safety and health program will seek to identify new hazards and failures in hazard controls, analyze findings, and identify feasible abatement methods. A system will be used to track results.

Recommended Performance Metric(s): Increase Safety Program Audit Compliance with no RAC 1 or 2.

Interviewees: Bureau managers, Supervisors, Employees, OHS staff, Union representatives and Law Enforcement staff

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Record-keeping logs -CA-1, CA-2 -Inspection program documents -Hazard notices -Bureau/office standards
-Inspection records -Abatement records -Abatement plans -SMIS reports
-Workers' Compensation program reports -Employee reports of unsafe and unhealthful

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Corrected hazards -Overall condition of facility or worksites -OSHA posters

Processes/Evaluation Criteria: (Rank 1-5)

1. Are the OSHA required inspections conducted and documented? _____
2. Does the bureau generally comply with DOI/OSHA standards? (How do deficiencies relate to the safety and health program: lack of inspections, training, funds, etc.)? _____
3. Does the bureau utilize as inspectors "personnel with equipment and competence to recognize hazards? _____
4. In addition to the annual inspections, are more frequent inspections conducted in all workplaces where there is an increased risk of accident, injury, or illness due to the nature of the work performed? _____
5. Are employee representatives provided the opportunity to participate during the inspections? _____
6. What is the process to respond to the abatement of the unsafe or unhealthful working condition? _____
7. Are corrective actions documented? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 3: Hazard Recognition and Prevention

(ii) Hazard Control and Abatement

Effective OHS programs can demonstrate that the workplace is inspected for hazards on a periodic or ongoing basis. Once hazards or potential hazards are recognized, it is important that they are controlled or abated in a prompt and effective manner and that appropriate tracking and records are maintained. OSHA describes a "hierarchy of controls" that should be used when deciding the manner in which hazards are reduced or eliminated. For example, for reducing chemical exposures, it is generally recognized that is desirable to change the process to eliminate the need for toxic chemicals, if feasible, or alternatively, substitute toxic materials with less toxic materials. More specifically, DOI has adopted a Risk Assessment System which is to be used by the bureaus for determining the priority for hazard abatement activities. Administrative controls can sometimes be used such as reducing the work shift so that exposures accumulated over the day do not exceed permissible limits. Engineering controls such as increasing ventilation or installing noise-reducing materials where needed is considered preferable to simply issuing personal protective equipment like respirators and ear plugs.

Hazard controls and abatement often rely on establishing and training employees in safe work procedures and instituting effective systems which take advantage of ongoing observation and correction of unsafe acts, positive reinforcement for safe acts, and, when necessary, application of a clearly communicated disciplinary system. Also, an effective facility and equipment maintenance program might be essential to reducing risks from slips, trips and falls or dangerous conditions from using broken equipment.

The tracking of hazards and the corrective actions used to control or abate them is also essential to an effective OHS program. Tracking can take many forms from something as simple as placing notations on the hazard report form to more formal spreadsheets and reports which document details of the specific measures to be taken, approvals, corrective action budgets, allowable timeframes for completion, follow-up inspections, etc.

(1) <u>Documents and Records Review</u>:

(a) Safety and health evaluations, job hazard analyses, unsafe/unhealthful condition reports, follow-up reports, and corrective action records.
(b) Any other documents, forms, or spreadsheets that help determine whether a reliable hazard tracking system is in place to tracks hazards to completion (e.g., near miss cards, safety committee meeting minutes, medical department work orders, etc.).
(c) Facility/maintenance work orders.
(d) Purchase orders (safety program-related).
(e) Engineering project logs
(f) Employee suggestions.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss their experience dealing with how hazards are initially recognized, how corrective actions are prioritized and planned, how budgets for the corrective actions are decided and approved and how completion status is tracked and ultimately confirmed.

(b) *Supervisors* should be able to discuss their experiences with interfacing with managers, other supervisors, facilities personnel and others to control or abate hazards they have identified. They should be able to explain what their role is in prioritizing hazards, tracking corrective actions through completion, conducting follow-up inspections, etc.

(c) *OHS staff* should be able to discuss specific examples of hazardous conditions being reported by them and their experiences with working with management and others as corrective actions are completed. They should be able to describe how priorities are established (e.g., using risk assessment codes), how promptly corrective actions are authorized and carried out, and, in general, how effective the hazard abatement and control mechanism are.

(d) *Employees and union representatives* should be able to explain how they go about reporting hazards, whether they believe they are at risk of reprisals for filing such reports, and discuss how responsive and effective they think management is when it comes to controlling and abating hazards in the workplace.

(e) *Field staff* can address the special hazard control and abatement issues associated with working outside and not in specific facilities.

(f) *Facilities staff* are usually involved in correcting and tracking hazards to completion. Sometimes employees are involved because a facilities work order is filled out as a method of discovering/correcting hazards.

(g) *Law enforcement personnel* often have firsthand experience dealing with emergencies stemming from unsafe acts, facilities or operations and should be able to provide their perspective about the effectiveness of the hazard control/abatement program.

(3) <u>Potential Interview Questions</u>:

(a) What kinds of safety and health hazards do you think are potentially present in your workplace? Who is aware of these potential hazards (e.g., management, OHS staff, and supervisor)?

(b) Have you ever reported a hazardous condition to your supervisor or other management official? If yes:

- What was the hazard?
- Whom did you notify?
- Did you report orally or in writing? If in writing, was a particular form or format used?
- Did you get a response indicating that your report was being addressed?
- Was a corrective action performed to control or abate the hazard? If yes, how long did it take? Who was involved? Was it effective?

(c) Describe the system for initiating, carrying out, tracking, and closing corrective actions (e.g. who specifically in the organization is responsible for each of these steps)?

(d) Do you feel that an adequate hazard prioritization system is used? That is, is the time it takes to perform a necessary corrective action commensurate with the degree of hazard? For example, are hazards which could result in a severe injury or illness and have a high probability of occurrence addressed first and without delay? Similarly, are adequate resources applied to controlling the hazard, commensurate with a sound hazard priority system?

(e) Is the principle of 'hierarchy of controls' used to control or abate potential hazards? Do you believe that any hazards not addressed by substitution or engineering controls are addressed by adequately designed administrative controls such as work shift limits or, if these controls are not adequate or feasible, by issuance of personal protective equipment?

(f) In general, do you think that management has a good understanding of the hazards? Do you feel that you and the other employees work in a place free of recognized hazards? If a hazard is reported, does management effectively investigate and correct, as necessary?

(g) Has the organization had you examined by a physician? If so, was it just at the start of work; Is it done periodically?

- If routine, how often?
- If not routine and not for start of employment, what was the reason?
- Did the examination seem thorough?
- Did anyone explain what was being done and why? If so, who?
- Were the results of the examination provided to you? Did anyone explain them? If so, who?

(h) What kind of personal protective equipment do you use, if any? Is it readily available when needed? Have you been adequately trained in their limitations, proper use, etc.? If you have been assigned a respirator, have you been fit tested? Medically qualified? For what substance(s) is the respirator intended to provide protection?

(4) <u>Observations</u>:

(a) Take a previous report (verbal or written) of an unsafe/unhealthful condition and follow the how this report was handled through the completion of the corrective action and close-out of the matter. It may be helpful to establish a paper trail (notifications, memos, logs, reports, etc.) documenting activities relating to the report. Visually inspect the workplace and assess the effectiveness of the corrective action. Verify completion status. Talk with affected employees, if possible. If it appears upon the follow-up that the corrective action was not made or was not effective, ascertain whether the official in charge and/or the appropriate safety and health committee was notified of the failure to abate.

(b) Observe workplace areas requiring warning signs or postings (e.g., hearing protection areas; construction areas requiring hard hats, protective footwear, safety glasses; areas with asbestos materials; etc.). Verify that appropriate signage is place and that stated requirements are being followed.

(c) Inspect the safety-related tools or equipment and ascertain whether meets the needs of the workplace in question. Such tools and equipment may include items such as lockout/tag out kits, spill kits, fall protection devices (e.g., body harnesses), eyewash stations, etc.

(d) Observe workplace operations and conditions for the presence of any apparent uncontrolled hazards and the lack of adherence to or enforcement of workplace OHS requirements.

(5) <u>References</u>:

Executive Order 12196 -The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

29 CFR 1960.25(c) All areas and operations of each workplace, including office operations, shall be inspected at least annually. More frequent inspections shall be conducted in all workplaces

where there is an increased risk of accident, injury, or illness due to the nature of the work performed. Sufficient unannounced inspections and unannounced follow-up inspections should be conducted by the agency to ensure the identification and abatement of hazardous conditions.

29 CFR 1960.28 Employee reports of unsafe or unhealthful working conditions

29 CFR 1960.28(a) The purpose of employee reports is to inform agencies of the existence of, or potential for, unsafe or unhealthful working conditions. A report under this part is not a grievance.

29 CFR 1960.28(b) This section provides guidance in establishing a channel of communication between agency employees and those with responsibilities for safety and health matters, e.g., their supervisor, the agency safety and health officials, safety and health committees, safety and health inspectors, the head of the agency, or the Secretary. These channels of communication are intended to assure prompt analysis and response to reports of unsafe or unhealthful working conditions in accordance with the requirements of Executive Order 12196. Since many safety and health problems can be eliminated as soon as they are identified, the existence of a formal channel of communication shall not prelude immediate corrective action by an employee's supervisor in response to oral reports of unsafe or unhealthful working conditions where such action is possible. Nor should an employee be required to await the outcome of such an oral report before filing a written report pursuant to the provisions of this section

29 CFR 1960.30(a) The agency shall ensure the prompt abatement of unsafe and unhealthful conditions. Where a Notice of an Unsafe or Unhealthful Working Condition has been issued, abatement shall be within the time set forth in the notice, or in accordance with the established abatement plan.

29 CFR 1960.30(b) The procedures for correcting unsafe or unhealthful working conditions shall include a follow-up, to the extent necessary, to determine whether the correction was made. If, upon the follow-up, it appears that the correction was not made, or was not carried out in accordance with an abatement plan prepared pursuant to paragraph (c) of this section, the official in charge of the establishment and the appropriate safety and health committee shall be notified of the failure to abate.

29 CFR 1960.30(c) The official in charge of the establishment shall promptly prepare an abatement plan with the appropriate participation of the establishment's Safety and Health Official or a designee, if in the judgment of the establishment official the abatement of an unsafe or unhealthful working condition will not be possible within 30 calendar days. Such plan shall contain an explanation of the circumstances of the delay in abatement, a proposed timetable for the abatement, and a summary of steps being taken in the interim to protect employees from being injured as a result of the unsafe or unhealthful working condition. A copy of the plan shall be sent to the safety and health committee, and, if no committee exists, to the representative of the employees. Any changes in an abatement plan will require the preparation of a new plan in accordance with the provisions of this section.

29 CFR 1960.30(d) When a hazard cannot be abated within the authority and resources of the official in charge of the establishment, that official shall request assistance from appropriate higher

authority. The local safety and health official, any established committee and/or employee representatives, and all personnel subject to the hazard shall be advised of this action and of interim protective measures in effect, and shall be kept informed of subsequent progress on the abatement plan.

29 CFR 1960.30(e) When a hazard cannot be abated without assistance of the General Services Administration or other Federal lessor agency, the occupant agency shall act with the lessor agency to secure abatement. Procedures for coordination with the General Services Administration are contained in Subpart E of this part.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* An effective communication system to transmit hazard and abatement information across the bureau or office exists. All employees are familiar with this system. Reported hazards are evaluated competently and corrective actions are developed and prioritized based on sound rationale (e.g., by using a 'hierarchy of controls' and 'risk assessment codes'). Corrective actions are carried out without delay and are effective. A good hazard reporting/corrective action tracking system is in place and employees are informed of steps being taken to address their concerns (especially those who originally reported the hazard). Where necessary, there is evidence that multiple disciplines (e.g., OHS staff, facilities personnel, supervisors, line employees) are actively engaged in the corrective action prioritization, planning and abatement processes. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* An effective communication system to transmit hazard and abatement information across the bureau or office exists. Most employees are familiar with this. Reported hazards are evaluated competently and corrective actions are developed and prioritized based on sound rationale (e.g., by using a 'hierarchy of controls' and 'risk assessment codes'). Most corrective actions are carried out without delay and are effective although there is evidence that this occasional does not occur due to lack of, for example, manpower, funds, etc. A good hazard reporting/corrective action tracking system is in place and employees are usually informed of steps being taken to address their concerns (especially those who reported the hazard). Where necessary, there is evidence that multiple disciplines (e.g., OHS staff, facilities personnel, supervisors, line employees) are actively engaged in the corrective action prioritization, planning and abatement processes. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* An effective system exists across the majority of the organization to address any reported hazards. Most employees are familiar with this system. Reported hazards are evaluated competently and corrective actions are developed and prioritized but sometimes without the benefit of sound, defensible rationale. Corrective actions are generally considered effective but some delays may occur. A hazard reporting/corrective action tracking system exists but occasionally it is not followed when it should be. Employees are sometimes, but not always, informed of steps being taken to address their concerns. It is not typical that multiple disciplines become actively engaged in the corrective action prioritization, planning and abatement processes, even though the process would benefit from this. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* The hazard control and abatement tracking system is not routinely used and, as a result, there is evidence that corrective actions are too often not effective and not conducted in a timely manner. Consequently, some employees are not confident in the organization's ability to effectively control workplace hazards or address reported concerns. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* A hazard control and abatement system is not present or has significant gaps. Recognized hazards often remain unabated for significant periods of time. Little confidence exists among employees that corrective actions will be effectively completed. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 3. Hazard Recognition and Prevention

Assessed Element: (ii) Hazard Control and Abatement

OHS Section Goal: An effective tracking system is in place that (a) identifies and assess hazards; (b) documents interim and final abatement actions and (c) promotes the use of engineering, work practice and administrative controls and personal protective equipment (PPE) as applicable to prevent and/or control workforce exposure(s) to such hazards

Recommended Performance Metric(s): Risk assessments completed; hierarchy of controls in place; prioritization of corrective actions.

Interviewees: Field staff -Facilities staff, Law Enforcement, Managers, Supervisors, OHS staff, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Job hazard analyses (JHA), follow-up, and corrective action records -Facilities work orders -Engineering project logs -Employee suggestions

-Ergonomic evaluations -Purchase orders (safety program related)

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-PPE Program-Tour facility identify PPE use

-Tour facilities to review engineering controls and warnings - Tour facilities to review administrative controls,

- Tour facilities to review hazards identified and control strategies -On site document reviews

Processes/Evaluation Criteria: (Rank 1-5)

1. Are employees provided place of employment, free from uncontrolled hazards? _____
2. Does the Bureau ensure the abatement of unsafe and unhealthful conditions following the DOI Risk Assessment Code? _____
3. Are sufficient unannounced inspections and unannounced follow-up inspections conducted to ensure the identification and abatement of hazardous conditions promoted? _____
4. Does the responsible manager/supervisor promptly prepare an abatement plan when the hazard cannot be corrected within 30 calendar days? _____
5. When a hazard cannot be abated within the authority and resources of the local establishment, is assistance requested from higher authority? _____
6. How effective is the Bureau's system for tracking abatement? _____
7. Are RAC 1 and 2 conditions abated immediately? _____
8. Are identified hazards coordinated with facility management for abatement? _____
9. Is a preventative maintenance schedule implemented for areas where needed and followed under normal circumstances? _____
10. Are breakdown repairs for safety related items are expedited? _____
11. Are appropriate controls (engineering, work practice and administrative controls, PPE) in place for significant hazards and continually improved upon based on workplace experience and general knowledge? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 3: Hazard Recognition and Prevention

(iii) Reports of Unsafe and Unhealthful Conditions

A reliable system should be in place for employees to notify, without fear of reprisal, appropriate management personnel about workplace conditions or operations that appear to be hazardous. The reporting system should:

- Encourage employees to use the reporting system;
- Provide for timely and appropriate responses to such notifications;
- Include a means to track responses and corrective actions taken; and
- Support anonymity if possible.

A system used by employees to both notify management of hazards and to track responses serves a dual purpose. It gives management the benefit of having many more workplace observers and it provides evidence that safety and occupational health issues are taken seriously and are a top priority in the organization. Documenting identified problems and tracking any corrective actions taken are critical to the credibility of the reporting system. Credibility is also measured by the nature of the safeguards against reprisals that might discourage reporting of unsafe conditions or hazards. Also, the reporting system must not require that the internal process be used before filing an employee may file a complaint with OSHA.

(1) <u>Documents and Records Review</u>:

(a) Safety and health policies and procedure.
(b) Unsafe/unhealthful condition reports, follow-up reports, and corrective action records
(c) Employee reports of hazards.
(d) Complaint logs.
(e) Facility/maintenance work orders.
(f) Written forms or reporting mechanisms that provide anonymity.
(g) Safety Committee meeting minutes.
(h) Safety and health evaluations (i.e. ergonomic/noise, etc.) – Employee concerns about unsafe/unhealthy conditions may be documented in the course of performing OHS inspections and evaluations.
(i) Medical department work orders – Near misses, injuries and illnesses can be logged through the medical department (e.g., first aid cases, etc.).
(j) Near miss cards – These are similar to accident/incident investigations, however, they are completed when a near miss occurs.
(k) Purchase orders (safety program-related) – These can be viewed because equipment may be needed as a result of an unsafe/unhealthful condition.
(l) Engineering project logs – Engineering a hazard out is the first line of defense. Project logs can convey what is being done or planned as a result of a report of a recognized hazard.

(m) Employee handbook – The handbook informs employees of their rights and responsibilities.
(n) Employee orientation manual – The manual provides employees information about handling safety hazards.
(o) OSHA poster – Poster is mounted in a location accessible and visible to all employees.
(p) "Tool Box" *Safety Briefings Minutes* – Records of safety and health briefings given by the bureau or office at any level in their organizations will indicate strong and weak areas of safety and health program implementation.
(q) Safety Training Observation Program (STOP) by DuPont – This program helps with hazard recognition for employees. Employees document the hazard in writing and then turn it in to management.

(a) **(2) <u>Potential Interviewees</u>:** *Managers* should be able to discuss the unsafe/unhealthful condition reporting system and how the system works.
(b) *Supervisors* should be able to convey what is done when an unsafe/unhealthy condition is reported to them and how the reports lead to an effective corrective action.
(c) *OHS staff* can provide assistance on how a condition is reported, prioritized, corrected, and followed through to completion.
(d) *Employees and union representatives* should be able to explain the bureau/office unsafe/unhealthy condition reporting system. They can discuss who they report unsafe/unhealthy conditions to and their experiences with regard to how responsive management is to these reports.
(e) *Field staff* who do not work in a specific facility can discuss how they report unsafe conditions.
(f) *Facilities staff* are usually involved in correcting hazards. Sometimes employees are involved because a facilities work order is filled out as a method of discovering/correcting hazards.
(g) *Contractors* can discuss how they report unsafe conditions to their management as well as to DOI.

(3) <u>Potential Interview Questions</u>:

(a) Explain how apparent hazards are identified, including the system for the employees to report hazards. For example, have you ever reported a hazardous condition to your supervisor or other management official here? If yes:
    1. What was the condition?
    2. Whom did you notify?
    3. Did you report it in writing or orally?
    4. Did you get a response? If so, was the response satisfactory?
    5. How long did it take to get a response?
    6. If you did not get a response, what did you do (e.g., did you try someone else)?
(b) Explain how hazard reports are processed and how does the workplace culture support or encourage the reporting of hazards.
(c) Provide examples of reported hazards getting corrected in a timely manner.
(d) Provide examples of how employees are encouraged to use the hazard reporting system, how accessible the policy is, and how the system has been communicated throughout the organization.
(e) With regard to facilities/maintenance work orders, how are the safety related concerns identified corrected and tracked to completion?

(4) <u>Observations:</u>

(a) Take a closed report of an unsafe/unhealthful condition item and check on its completion status. Is there evidence that there was follow-up with those who initiated the report and other affected employees? Talk with the reporter and affected employees, if possible.
(b) Verify that there is a working telephone number to report emergencies and mishaps and that calls are documented and promptly acted upon.
(c) Identify whether there is an online suggestion box available through the organization's intranet.
(d) Attend a safety meeting and observe how reports of safety concerns or potential hazards are addressed.

(5) <u>References</u>:

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

29 CFR 1960.27 Representatives of officials in charge and representatives of employees

29 CFR 1960.27(d) Safety and health inspectors shall consult with employees concerning matters of occupational safety and health to the extent deemed necessary for the conduct of an effective and thorough inspection. During the course of an inspection, any employee shall be afforded an opportunity to bring to the attention of the Safety and Health Inspector any unsafe or unhealthful working condition which the employee has reason to believe exists in the workplace.

29 CFR 1960.28 Employee reports of unsafe or unhealthful working conditions

1960.28(a) The purpose of employee reports is to inform agencies of the existence of, or potential for, unsafe or unhealthful working conditions. A report under this part is not a grievance.

1960.28(b) This section provides guidance in establishing a channel of communication between agency employees and those with responsibilities for safety and health matters, e.g., their supervisor, the agency safety and health officials, safety and health committees, safety and health inspectors, the head of the agency, or the Secretary. These channels of communication are intended to assure prompt analysis and response to reports of unsafe or unhealthful working conditions in accordance with the requirements of Executive Order 12196. Since many safety and health problems can be eliminated as soon as they are identified, the existence of a formal channel of communication shall not prelude immediate corrective action by an employee's supervisor in response to oral reports of unsafe or unhealthful working conditions where such action is possible. Nor should an employee be required to await the outcome of such an oral report before filing a written report pursuant to the provisions of this section

29 CFR 1960.71(a) The Act and E.O. 12196 require all Federal agency heads to submit to the Secretary an annual report on their agency's occupational safety and health program, containing such information as the Secretary prescribes.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* The bureau or office has a policy for reporting unsafe and unhealthful conditions and a reliable system for reporting unsafe and unhealthful conditions is provided for employees. The system provides for employees to receive very timely and appropriate responses, and employees are systematically informed of the results of their notifications. Employees are encouraged to use this reporting system and evidence exists that employees contribute reports whenever necessary. *The system supports anonymity. If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* A reliable system for reporting unsafe and unhealthful condition system is provided to employees. The system provides for employees to receive adequately timely and appropriate responses. Usually employees are informed of the results of the results of their notifications. Employees are encouraged to use this reporting system and evidence exists that employees contribute reports. *The system supports anonymity. If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Management has a somewhat reliable system for employee to report unsafe and unhealthful conditions. Employees are informed about the system and are generally aware of it but they are not routinely encouraged to use it. Employees are eventually given responses to their reports. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Management has an incomplete system for reporting unsafe and unhealthful conditions; and/or employees are not generally aware of the system nor encouraged to use it. The overall system has some elements in place but does not seem to be adequate. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* Management does not have a system for reporting unsafe and unhealthful conditions. The process is non-existent or highly lacking. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 3. Hazard Recognition and Prevention
Assessed Element: (iii) Reports of Unsafe/Unhealthful Conditions
OHS Section Goal: An effective process to report unsafe or unhealthful working conditions
Recommended Performance Metric(s): Number of unsafe/unhealthful conditions reported by employees
Interviewees: Field staff, Facilities staff, Law Enforcement, Managers, Supervisors, OHS staff, Employees and Union representatives **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -Unsafe/Unhealthful Condition Reports, follow-up, and corrective action records -Facilities work orders -Engineering project logs -Employee suggestions -Ergonomic evaluations -Purchase orders (safety program related) **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: **(Rank 1-5)** Are employees aware of their right and the process used to report unsafe and unhealthful working conditions to appropriate officials? _____ Is there an effective program for employees or representatives of employees to report unsafe or unhealthful working conditions? _____ Are complaint inspections conducted within 24 hours for employee reports of imminent danger conditions, within three working days for potentially serious conditions, and within 20 working days for other than serious safety and health conditions, unless the hazardous condition(s) identified are abated immediately? _____
OHS Section Rating ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

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Component 3: Hazard Recognition and Prevention

(iv) Process/Operational Hazard Analysis, Management of Change

Identifying and eliminating hazards before they cause injury or illness is the most effective means to reduce workplace risk. An effective OHS management system should have policies in place which require a thorough review of new processes and operations in order that safety and occupational health hazards may be identified as far in advance as possible, such as during the design or planning phase. When OHS risks are identified up-front, it is often easier to build in engineering controls and ensure newly required OHS policies and procedures are in place and workers are ready to follow them. Similarly, when a change occurs in an existing process or operation that might create new hazards, effective change management principals should be used to identify impacts on OHS requirements such as worker training, hazard communication, worker protection, etc.

Process/operational hazard analyses can be accomplished through a number of techniques. One technique is a job hazard analysis (JHA). OHS programs effectively utilizing JHAs have been proven to result in improved work practices and hazard controls and ultimately in fewer workplace injuries and illnesses A JHA involves a thorough review of hazards and potential hazards associated with each step of a task, operation, or project. Then, specific hazard controls are provided for each hazard listed under each respective step. In this manner, a systematic assessment of 'steps', 'hazards' and 'controls' can be performed and documented. JHAs can be performed for virtually all workplace operations, activities, processes, and discrete tasks. JHAs should be performed for all new or updated jobs.

(1) <u>Documents and Records Review</u>:

(a) Planning documents such as memos, engineering reports, construction bidding documents, etc., can be used to identify new operations which might require up-front hazard analysis.
(b) Purchase orders or facility work orders may reflect OHS-related equipment, supplies, training, renovations, etc., stemming from hazard analyses or anticipation of new/modified operations.
(c) Reports of OHS inspections, JHAs, pre-job safety reviews, or change analyses, including follow-up and corrective action records, can reflect the effectiveness of the organization's hazard analysis program.
(d) Employee suggestions may indicate existing or potential unsafe or unhealthful working conditions and reflect the extent of previous hazard assessments.
(e) PPE program assessments can reflect the outcomes of previous hazard assessments and JHAs.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the job safety and analysis program and how the analyses are conducted and used to mitigate hazards. At least one example of how new or changed operations were assessed for OHS ramifications should be solicited.
(b) *Supervisors* should be able to convey how hazard analysis pertains to their areas of responsibility and how employees are involved in the process. They can also share how the

findings of the JHA have eliminated and prevented hazards in their work area and how they have been used to improve employee training.

(c) *OHS staff* can share how they are involved in performing and using JHAs, including how change is implemented as a result of the analyses.

(d) Employees and union representatives should be able to explain the JHA program and provide examples of how hazard assessments have been used to make their workplace safer.

(e) *Field staff* can discuss how they are involved in performing and using JHAs even though they do work in any facility.

(f) *Facilities staff* becomes involved with the hazard analysis process as new/modified equipment, buildings, processes are introduced or changed. They may have valuable insight regarding the effectiveness of existing hazard assessment/change control policies/procedures.

(3) <u>Potential Interview Questions</u>:

(a) What process is used to identify OHS hazards in the general workplace?

(b) Is a JHA or equivalent completed for all potentially hazardous jobs? When an injury or illness has been recorded? Are JHAs updated and improved based on workplace experience? To what extent are JHAs actually used by workers and their supervisors?

(c) What policies are in place for integrating a hazard analysis into the design, development, implementation, and change of workplace processes and work practices?

(d) Is an effective hazard review conducted of new facilities, processes, materials and equipment? Is the OHS staff kept apprised of such changes before plans are finalized? Are deviations/variances from plans reviewed by OHS staff for OHS impacts and approved by management?

(e) Does the bureau or office collect, compile statistics, and evaluate OSH exposure data?

(f) Does the bureau use to protect employees?

(g) How are results from hazard analyses used to implement the 'hierarchy of controls' as defined by OSHA (e.g., determine engineering controls, PPE, administrative controls, employee training, etc.)?

(h) Are JHAs reviewed by employees when they first do a job or transfer from one area to another?

(4) <u>Observations</u>:

(a) Posted JHAs, corrective action tracking lists

(b) Announcements of new facilities or operations

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs.

OSHA 3071 Job Hazard Analysis 2002 (Revised) - This booklet is used by employers, foremen, and supervisors to analyze jobs and recognize workplace hazards. It explains what a job hazard

analysis is and offers guidelines to help conduct a step-by-step analysis.

Department of Interior Departmental Manual - Chapter 14 Job Hazard Analysis

29 CFR 1910.119(d) Process safety information. In accordance with the schedule set forth in paragraph (e)(1) of this section, the employer shall complete a compilation of written process safety information before conducting any process hazard analysis required by the standard. The compilation of written process safety information is to enable the employer and the employees involved in operating the process to identify and understand the hazards posed by those processes involving highly hazardous chemicals. This process safety information shall include information pertaining to the hazards of the highly hazardous chemicals used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process.

29 CFR 1910.119(e)(1) The employer shall perform an initial process hazard analysis (hazard evaluation) on processes covered by this standard. The process hazard analysis shall be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process. Employers shall determine and document the priority order for conducting process hazard analyses based on a rationale which includes such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* There is a written policy requiring the performance of hazard analyses for new, on-going, and changed operations. The policy provides for the analysis of all jobs over a given period of time and sets priorities for the most hazardous jobs. The policy is being effectively implemented and all jobs have been subject to a JHA or equivalent prior to operation for unusual jobs or within the last three years, whichever is most recent; the most hazardous jobs have been analyzed within the past 12 months. Job hazard analyses are detailed (i.e., breaking the job into steps, with hazards listed for each step and, for each hazard listed, one or more prevention or control measure is provided) and effectively utilized by supervisors and employees. There is evidence from documentation and/or interviews that the analyses result in revised job procedures, changes in equipment or materials and/or employee training/retraining. JHAs are reviewed at the completion of jobs to insure they are current and correct. There is evidence that OHS staff and management are adequately involved in assessing and approving new or modified operations/jobs and that OHS ramifications are considered and resolved in a timely fashion. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds*. There is a written policy requiring the performance of hazard analyses for new, on-going, and changed operations. The policy provides for the analysis of most jobs over a given period of time. The policy is being effectively implemented and most jobs have been subject to a JHA or equivalent within the last three years; the most hazardous jobs have been analyzed within the past 12 months. Job hazard analyses are detailed and effectively utilized by supervisors and employees. There is evidence from documentation and/or interviews that the analyses result in revised job procedures, changes in equipment or materials and/or employee training/retraining. There is evidence that OHS staff and management are adequately involved

in assessing and approving new or modified operations/jobs and that OHS ramifications are considered and resolved in a timely fashion. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* There is a policy requiring the performance of hazard analyses for new, on-going, and changed operations. The policy provides for the analysis of jobs over a given period of time but some jobs have not yet been analyzed or have not been analyzed within the last several years. The hazard analyses vary considerably in detail and little priority is given to higher hazard jobs. There is evidence that the analyses are not effectively used by supervisors and employees to improve workplace OHS. Similarly, OHS staff and management are often not adequately involved in assessing and approving new or modified operations/jobs and that OHS ramifications are considered and resolved in a timely fashion. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* There is a policy requiring the performance of hazard analyses for new, on-going, and changed operations but it is lacking in detail or is not being followed. Many jobs have not yet been analyzed or have not been analyzed within the last several years. The hazard analyses performed are not rigorous and little priority is given to higher hazard jobs. There is little evidence that the analyses are being effectively used by supervisors and employees to improve workplace OHS. Similarly, OHS staff and management are not adequately involved in assessing and approving new or modified operations/jobs and that OHS ramifications are considered and resolved in a timely fashion. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* There is no policy requiring the performance of hazard analyses for new, on-going, and changed operations or, if there is a policy, it is significantly lacking in detail or not being followed. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: **3. Hazard Recognition and Prevention**

Assessed Element: (iv) Process/Operational Hazard Analysis, Management of Change

OHS Section Goal: Job Hazard Analysis and risk assessments are conducted and updated as new processes, jobs, and tasks are begun. Recommended controls that minimize or eliminate worker exposure to the hazard(s) are implemented.

Recommended Performance Metric(s): Job Hazard Analysis and risk assessments for all recognized hazardous operations.

Interviewees: Field staff, Facilities staff, Law Enforcement, Managers, Supervisors, OHS staff, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Job Hazard Analysis (JHA), follow-up, and corrective action records
-Facilities work orders
-Engineering project logs
-Employee suggestions
-Ergonomic evaluations
-Purchase orders (safety program related)
-PPE Program

Processes/Evaluation Criteria: (Rank 1-5)

1. Are Job Hazard Analysis (JHA) or risk assessments completed for all hazardous jobs, or evaluated and considered where an injury or illness has been recorded? _____
2. Is hazard analysis integrated into design, development, implementation, and changing of all processes and work practice? _____
3. Do knowledgeable persons review all planned/changed/new facilities, processes, materials and equipment before they are procured? _____
4. Are requests for deviations/variances reviewed by safety and health officials and approved by management? _____
5. Are JHA controls continually improved based on workplace experience and general knowledge? _____
6. Does the Bureau collect and compile occupational safety and health exposure data for the proper evaluation of worksite hazards and necessary corrective action, as well as maintaining program OHS statistics? _____
7. Does the Bureau use hierarchy of controls to protect employees? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 4: Evaluation and Analysis

The effective evaluation of each element of the OHS program is essential for ensuring that the program is up-to-date and accomplishing what is desired in terms of fostering a safe and occupationally healthy workplace that is in compliance with all pertinent regulations, policies and procedures. Evaluations and analyses should be carried out by independent-minded experts both formally on a periodic basis, as well as informally on an ongoing basis. Where deficiencies are detected due to, for example, lapses in compliance, unclear requirements, or workplace changes, corrections should be promptly made to keep the program on course.

When injuries, illnesses or "near misses" occur, they need to be thoroughly evaluated and trended to identify the various root causes and contributing factors so that they can be eliminated or controlled. Employees should be closely involved in the evaluations and results regularly communicated to the workforce in order that safety and health awareness is cultivated and confidence in the OHS promoted.

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 4: Evaluation and Analysis

(i) Program Evaluation and Assessment

The OHS program at all organizational levels should be evaluated periodically to assess how effective it is in identifying and mitigating job hazards and ensuring a safe and occupational healthful work environment. The evaluation should cover the entire set of components and elements of the OHS program as identified in the DOI *Safety and Occupational Health Program Evaluation Tool* and result in a written report that offers specific recommendations for addressing deficiencies and making improvements. Recommendations should be acted upon on a timely basis and monitored using a formal tracking system.

The annual reviews are part of a cycle of continuous improvement that is necessary for staying on course for meeting program health and safety goals. Where elements of program operations are not meeting objectives, corrections and adjustments must be made.

(1) <u>Documents and Records Review</u>:

(a) Safe operating policies and procedures.
(b) Safety program evaluations, audits and updates.
(c) Injury and illness trend reports – These reports may show patterns over time and point to common causes that can be identified and prevented.
(d) Accident investigation, root cause analysis, and mishap review board reports.
(e) SHARE goals status reports - Statistical information required by the SHARE initiatives are indicators of safety and health program performance.
(f) Procedures for safety and health program reviews and evaluations.
(g) Annual report to OSHA.
(h) Tracking lists of OHS issues from different parts of the organization or facility.
(i) Job Hazard Analyses (JHA) records.
(j) Industrial hygiene exposure data.
(k) Injury/illness data analysis - OSHA 300 logs, CA-1 and CA-2 records, and other statistical information collected by the bureau/office are good indicators of program performance.
(l) Organization chart and job descriptions.
(m) Hazard abatement and follow-up corrective action reports.
(n) OSHA inspection reports.
(o) Annual OSH report to OSHA.
(p) Safety committee meeting minutes.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the goals of the OHS program evaluation and explain how information gained from it is assessed, prioritized, and used to improve the health and safety environment.

(b) *Supervisors* should be able to convey how the program evaluation is conducted in their areas and how corrective actions are managed and tracked.
(c) *OHS staff* should be able to discuss their role in completing the evaluation and provide specific examples of how the program has benefited from the evaluation over time, key program improvements currently being addressed, and how effective the evaluations are in fostering continuous improvement.
(d) *Employees and union representatives* should be able to explain their role the evaluations and how well they think the program is working in terms of improving workplace OHS.
(e) *Workers' compensation managers and administrative officers* should be able to provide information about where the OHS priorities exist based on injury and illness statistics and how effective OHS program evaluations are at improving these priority areas.

(3) <u>Potential Interview Questions</u>:

(a) What plans and procedures are currently in place for evaluating the bureau's or office's internal occupational safety and health program? When was the last baseline evaluation of health and safety operations performed? What were the major findings from previous evaluations?
(b) Are the results of OHS program evaluations and assessments reviewed at the DASHO level? Who else reviews the findings?
(c) What personnel comprise the evaluation team? What are their credentials?
(d) How is improvement in the OHS program measured?
(e) Please provide examples of how program evaluation findings have resulted in OHS improvements.

(4) <u>Observations</u>:

(a) Tour the workplace and evaluate improvements claimed to be a result of previous OHS program evaluations and corrective actions.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual - Chapter 3 Annual Action Plans and Status Reports

Department of Interior Departmental Manual - Chapter 5 Program Evaluations

29 CFR 1960.79 Agency heads shall develop and implement a program of self-evaluations to determine the effectiveness of their occupational safety and health programs. The self-evaluations are to include qualitative assessments of the extent to which their agency safety and health programs are:

1960.79(a) Developed in accordance with the requirements set forth in Executive Order 12196 and this part and,

1960.79(b) Implemented effectively in all agency field activities. Agencies needing assistance in developing a self-evaluation program should contact the Secretary.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding:* A well-documented system is in place for evaluation of the OHS program. All workplace facilities and operations are evaluated at least annually using tools developed by the bureau or office. The evaluation tool ensures that the program is fully functional. Significant evidence exists that OHS evaluations have fostered good program improvements and resulted in a safer and healthier workplace. Personnel conducting the evaluations are well-trained in OHS program evaluation methods. A written report is provided delineating specific recommendations for improvement in program effectiveness. An ongoing program exists for addressing significant program deficiencies which is proactively driven by senior management. There is a formal tracking system which monitors program improvement metrics. Overall, employees at all levels embrace a spirit of continuous OHS program improvement. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceed:* A documented system is in place for evaluation of the OHS program. Virtually all workplace facilities and operations are evaluated at least annually for each of the components and elements of the OHS program as identified in the review developed by the bureau or office. Personnel conducting the evaluations are trained in OHS program evaluation methods. A written report is provided delineating specific recommendations for improvement in program effectiveness. An ongoing program exists for addressing significant program deficiencies which is proactively driven by senior management. There is a tracking system which monitors program improvement metrics. Overall, employees at virtually all levels embrace a spirit of continuous OHS program improvement. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met:* A system is in place for evaluation of the OHS program but some aspects are outdated or not always well documented. Most workplace facilities and operations are evaluated at least every 3 years for most of the components and elements of the OHS program as identified in the review developed by the bureau or office. Personnel conducting the evaluations have some training in OHS program evaluation methods but are not truly proficient. A report is provided delineating specific recommendations for improvement in program effectiveness but it is cursory and not detailed. Significant program deficiencies are addressed over time but not always in a timely manner since this is not a priority of senior management. Some program improvement metrics are compiled. Overall, most employees embrace a spirit of continuous OHS program improvement. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* A system is in place for evaluation of the OHS program but it is not complete or well documented. Many workplace facilities and operations are not evaluated or evaluated infrequently (i.e., more than 3 years from last evaluation). Evaluation tools are not used

effectively. Personnel conducting the evaluations have little training in OHS program evaluation and lack proficiency. Reports of findings are cursory and do not provide adequate insight into the nature of necessary improvements. Significant program deficiencies are not addressed in a timely manner. Few program improvement metrics are compiled. Overall, few employees embrace a spirit of continuous OHS program improvement. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* No system is in place for evaluation of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: **4. Evaluation and Analysis**

Assessed Element: (i) Program Evaluations and Assessments

OHS Section Goal: Internal safety and health program evaluations are conducted at appropriate organizational levels to assess and validate effectiveness of the bureau/office's safety and health programs, identify and address program weaknesses and ensure continuous improvement.

Recommended Performance Metric(s): Assessments scheduled and conducted. Results used for continuous program improvement.

Interviewees: Bureau managers, Supervisors, Employees, Union representatives, Safety and health staff, Workers' Compensation managers and Administrative officers

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Safe Operating Procedure(s) -Safety program evaluations, audits and updates -Injury or illness trend reports -Accident Review Boards
-SHARE goals status reports - Inspections of injury producing operations/ -Procedures for safety and health program reviews and evaluations
-Annual OSHA report -Lists of OHS issues -Job Hazard Analyses -Exposure data
-Injury/illness data analysis -Organization chart, job descriptions -Program review records -Incident investigation records
-Hazard abatement records -Inspection/Monitoring data/corrective action -OHS program compliance review
-Follow-up corrective action reports -Annual OHS report to OSHA

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Tour facilities, compare to OHS issues list, incident investigation corrective actions, OHS inspections recommendations

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Are there effective plans and procedures for evaluating the Bureau's internal occupational safety and health program? _____
2. Are the results reviewed at the DASHO level? _____
3. Do internal evaluations meet regulatory requirements? _____
4. Does the evaluation team provide feedback on performance? _____
5. Has the Bureau performed a baseline evaluation and is this baseline used for continuous improvement? _____
6. Are program review teams properly trained to conduct program evaluations? _____
7. Has the Bureau developed performance measures or indicators and are they used in evaluations to identify opportunities for program improvement? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 4: Evaluation and Analysis

(ii) Accident Analysis and Prevention

Accident and illness analysis is a critical part of an effective OHS program. The analysis should include the examination of information such as injury and illness statistics and reports (OSHA 300 logs, CA-1 and CA-2 reports, 'near-miss' reports, etc.), accident investigations including 'root cause' reports, OHS violation citations, inspection reports by OHS staff and employees, workers compensation claims, and others. The overall purpose of these analyses is to detect workplace trends that may point to underlying causes and, importantly, lead to the development of corrective and preventive actions. Trend analysis is useful in identifying patterns that may not be observed through the examination of isolated incidents.

All employees should be encouraged and motivated to provide the types of information needed for effective accident and illness analysis. Conversely, the information derived from the analysis of accidents and illnesses should be made available to all personnel responsible for the OHS program. Of course, it is not enough to simply analyze this information and identify corrective/preventive actions, the accident analysis and prevention system must ensure that real improvements to operations, facilities, employee behaviors, policies, and procedures are made in a prompt, effective manner.

(1) <u>Documents and Records Review</u>:

(a) Injury and illness statistics and records covering at least the past three years.
(b) Reports of unsafe/unhealthful conditions and workplace assessments for at least the past three years. Trends may be evident in these types of documents.
(c) OHS program monitoring documents and strategic plans - These types of documents, created by supervisors or managers, can help identify programmatic areas that are a cause for concern and may be an early indication of a trend.
(d) Management decision documents – Various management decisions may show corrective and preventive actions that have been taken in response to analyses of accidents and illnesses.
(e) Statistical information required by the SHARE initiatives can be indicative of safety and health program performance and reveal meaningful trends.
(f) Related action plans, goals, objectives – Recurring action plans, goals, and objectives may indicate a trend that requires further review.
(g) OHS corrective actions lists may identify occupational health and safety concerns that may be recurring through different parts of the workplace. They may also reflect the status of corrective actions identified from previous accident/trend analyses.
(h) Safety Management Information System (SMIS) reports may reflect trends from inspections, industrial hygiene findings, near misses, etc.
(i) JHA - Repeat hazards are an early warning signal.
(j) Medical program records – Injuries and illnesses may be logged through the medical department (first aid cases, etc.).

(k) OSHA incident logs –OSHA 300 records and other statistical information that is collected by the bureau/office can identify reoccurring issues. These mandatory OSHA recordkeeping forms must be kept for five years following the year they cover and can be analyzed for multi-year trends and evidence of program performance.
(l) Accident/incident investigations can help identify underlying causes of accidents and injuries.
(m) Maintenance work orders – Facility work orders are filled out so that maintenance can be logged, and completed. This is one method of hazard reporting.
(n) Records of disciplinary actions or OSHA citations can identify weak areas in an OHS program (e.g., inadequate training, ineffective oversight, lack of policies, etc.).
(o) Safety Committee meeting minutes may reflect trends from expressed employee concerns, corrective action strategies, etc.
(p) Training records for serious accident investigation team members.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should describe what sort of injury and illness data/information is collected, how it is evaluated, and how analysis leads to corrective actions and programmatic enhancements.
(b) *Supervisors* should be able to convey how and what analyses have been conducted in their assigned area how trends are used to make new adjustments and improvement the work environment.
(c) *OHS staff* can provide assistance on goals, objectives, and metrics.
(d) *Employees and union representatives* should be able to name health and safety goals and objectives, how those goals/objectives are measured (metrics), and what progress is being made.
(e) *Serious Accident Investigation Team members* can discuss the special processes and expertise brought to bear when a serious accident is investigated and their impression of how effectively root causes have been addressed in the past.

(3) <u>Potential Interview Questions</u>:

(a) Who maintains the OSHA 300 Log (listing of all site injuries and illnesses) and OSHA 301 Form (individual record of a work-related injury or illness)? Where is the OSHA 300A (Annual Summary) posted from February-April?
(b) What records, statistics and sources of data are used in injury/illness analysis? What is the process for reviewing injury/illness statistics? Is trend analysis conducted on the data?
(c) How are decision makers provided the results of accident analysis? When was the last time this occurred? How was the information used?
(d) Who performs these analyses? What are their qualifications? Is the analysis reviewed, audited, or confirmed in any way, and if so, who does this?
(e) What courses of action have been taken to mitigate hazards, prevent injury/illness, or otherwise enhance the OHS program as a result of the analysis?
(f) (For employees) Are you aware that accident analysis (including injury/illness trend analyses) are conducted for your workplace? Are you aware of any trends or repeated/ongoing concerns that should be identified and addressed? Do you feel the accident analysis system here is effective?

(4) <u>Observations</u>:

(a) Evidence that corrective actions from previous accident analyses have been effectively completed.

(b) OSHA 300 log is accessible and OSHA 300A is visibly posted.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual – Chapter 7: Incident/Accident Reporting/Serious Accident Investigation, Chapter 1: Authority, Purpose, and Policy and Chapter 2: Responsibilities.

29 CFR 1960.66(a) The purpose of this subpart is to establish uniform requirements for collecting and compiling by agencies of occupational safety and health data, for proper evaluation and necessary corrective action, and to assist the Secretary in meeting the requirement to develop and maintain an effective program of collection, compilation, and analysis of occupational safety and health statistics.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* There has been an effective accident analysis system in place in the organization for at least the past twelve months. Accident investigation reports, injury and illness reports and logs, hazard inspection reports, unsafe/unhealthful condition trends and other health and safety information from throughout the organization and over multiple months/years are analyzed by qualified personnel so that trends, root causes, and common deficiencies are identified. All required health and safety reports are submitted on time and completed in detail in order to facilitate analysis. The results of the analyses are shared with all levels of management, discussed in the Safety Committee, and available to employees, as appropriate. Corrective action plans are promptly developed and implemented to effectively address any causal patterns or trends that are identified. The results of the analyses contribute directly to the ongoing enhancement of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds. Th*ere has been an effective accident analysis system in place in the organization for at least the past six months. Accident investigation reports, injury and illness reports and logs, hazard inspection reports, unsafe/unhealthful condition trends and other health and safety information from most of the workplaces and over a significant period of time are analyzed by qualified personnel so that trends, root causes, and common deficiencies are identified. Most required health and safety reports are submitted on time and completed in detail in order to facilitate analysis. The results of the analyses are shared with most levels of management, discussed in the Safety Committee, and available to most employees, as appropriate. Corrective action plans are promptly developed and implemented to effectively address any causal patterns or trends that are identified. The results of the analyses contribute directly to

the ongoing enhancement of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* There is an accident analysis system in place in the organization but it has not yet been formalized or well-integrated into the OHS program. OHS information from a majority of, but not all, workplaces is analyzed for trends, root causes, and common deficiencies- but not on a regular or consistent basis. Required health and safety reports are generally submitted on time and completed in sufficient detail in order to facilitate analysis, but lapses regularly occur. The results of the analyses are shared with some levels of management, discussed in the Safety Committee, and available to some employees, as appropriate. Corrective action plans are developed and implemented to address any causal patterns or trends that are identified but they are not detailed or otherwise effective in promptly addressing the concerns. The results of the analyses contribute somewhat to the ongoing enhancement of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* There is the beginning of an accident analysis system in the organization but it has not yet been formalized or well-integrated into the OHS program. OHS information from only a fraction of the workplaces in the organization is analyzed and not on a regular or consistent basis. Required health and safety reports are often completed without sufficient detail to facilitate analysis. The results of the analyses are not often shared with management, discussed in the Safety Committee, or available to employees, as appropriate. Corrective action plans are not detailed or otherwise effective in promptly addressing the concerns. The results of the analyses do not contribute much to the ongoing enhancement of the OHS program. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* There is no accident analysis and prevention system in the organization. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: d. Evaluation and Analysis

Assessed Element: (ii) Accident Analysis and Prevention

OHS Section Goal: Assess injury and illness records to establish and implement a process to prioritize the OHS issues.

Recommended Performance Metric(s): Accident data is analyzed and communicated for prevention purposes.

Interviewees: Selected monitoring task owners, Managers, Supervisors, Employees, Union representatives and OHS staff

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-OHS program monitoring documents
-Medical program documents
-Assessments
-Management decision documents
-List of parameters to monitor (e.g., SHARE)
-Selected monitoring data (e.g., inj./ill. rates)
-Related action plans, goals, objectives
-OHS issues list
-SMIS reports
-Employee reports of unsafe/unhealthful conditions
-JHA
-Medical program records

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Monitoring system(s) work products/ data reports
-OHS issues list
-Management of corrective actions or rewards

Processes/Evaluation Criteria: (Rank 1-5)

1. Does the Bureau have recording and reporting requirements that are in compliance with 29 CFR Part 1904 for determining which injuries and illnesses are entered into the records and how they are entered, and provide injury and illness information required by 29 CFR Part 1904? _____
2. Is the OSHA 300 Log maintained and is the OSHA 300A posted as required? _____
3. Does the Bureau, region and local organization review injury/illness statistics and provide analysis and feedback to respective management? _____
4. Are injury/illness reports compared to OWCP claims to identify trends and sources of injuries? _____
5. Are supervisors conducting accident investigations? _____
6. Do managers use the accident data provided to them to identify high risks jobs and implement prevention measures? _____
7. Are exposure records and analysis maintained and available to safety personnel? _____
8. Are injuries and illnesses audited by safety personnel and verified as accurate and complete? _____
9. Is injury/illness data fully analyzed to identify underlying causes and other contributing factors? _____
10. Are all levels of management and the workforce aware of results of data analysis and resulting preventive activity? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

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Component 4: Evaluation and Analysis

(iii) Data Analysis. Performance Metrics, Management Review/Follow-up

An effective OHS program should have a set of clearly defined high-level objectives and quantified performance indicators, such as a strategic plan, which are reviewed and updated at least annually. The objectives and performance indicators should be based on issues that offer the greatest opportunity for program improvement and risk reduction. They should be communicated to all employees such that everyone understands the direction and priorities of the OHS program and how results and performance are measured. Periodic reports should be made which identify progress towards the objectives as well as potential impediments or setbacks. Management should actively drive this process by reviewing progress reports, assigning responsibilities for address impediments, and ensuring appropriate follow-up and oversight.

(1) <u>Documents and Records Review</u>:

(a) Written goals and objectives for the OHS program including established performance indicators (e.g., safety committee minutes, OHS budget requests, etc.).
(b) Previous OHS program evaluations (e.g., audits or assessments using the DOI Safety and Health Program Evaluation Tool).
(c) SHARE goal documents.
(d) Analysis reports from information such as injury and illness statistics and reports (OSHA 300 logs, CA-1 and CA-2 reports, 'near-miss' reports, etc.), accident investigations including 'root cause' reports, OHS violation citations, inspection reports by OHS staff and employees, workers compensation claims, and others.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to describe the current strategic goals, objectives, and priorities of the OHS program, why they were established, and how they track progress (e.g., what metrics are being used, what reports they rely on, etc.).
(b) *Supervisors* should be able to convey how the objectives and metrics relate to their areas of responsibility and what reports are required of them to allow their management to make informed decisions about what strategic improvements are necessary for the OHS program.
(c) *OHS staff* should be able to discuss how they contribute to providing the data and information necessary for strategic goals to be established and monitored. In addition, they can provide their views on the strategic priorities for the overall OHS program and on recent accomplishments and current impediments.
(d) *Employees and union representatives* should be able to identify current strategic goals and objectives of the OHS program, how important they are to their fostering OHS in their specific workplace, and what they are currently doing that helps advance these strategies.

(3) <u>Potential Interview Questions</u>:

(a) What type and level of assistance has the Designated Agency Safety and Health Official provided to the Director for establishing goals and objectives for reducing and eliminating occupational accidents, injuries, and illnesses?
(b) What are the current strategic bureau or office goals and objectives for the OHS program? How are they developed? How are they measured?
(c) How does leadership communicate OHS goals and objectives throughout the organization?
(d) Are a 'critical few' objectives identified and prioritized so that focus can be placed where the greatest improvement can be made in employee safety and health and risk reduction?
(e) Are managers/employees aware of their responsibilities and goals under the SHARE or other national initiatives?
(f) In what ways does the bureau evaluate and reward success in achieving established goals and objectives?
(g) What progress do you see pertaining to the strategic improvement of the OHS program?
(h) What impediments do you see pertaining to the strategic improvement of the OHS program? Are these impediments being effectively addressed by management?

(4) <u>Observations</u>:

(a) Written OHS goals and objectives are easily accessible to all employees.
(b) Employees are willing and able to articulate the OHS goals and objectives as they relate to their work activities.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Instructions for evaluation of Federal agency occupational safety and health programs.

CFR 29 1960 - Program Elements for Federal Employees OSHA

Department of Interior Departmental Manual - Chapter 1 Authority, Purpose, Policy

Department of Interior Departmental Manual - Chapter 2 Responsibilities

Department of Interior Departmental Manual - Chapter 3 Annual Action Plan and Status

Department of Interior Departmental Manual - Chapter 5 Program Evaluations

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Clear strategic goals have been established for the OHS program based on sound rationale and programmatic needs. These goals have been communicated to all personnel and meaningful performance indicators have been developed. Employees at all levels can articulate

how their performance contributes to achieving these goals. Management actively drives continuous improvement of the OHS program with the benefit of performance measures, progress reports and input from the OHS staff, supervisors, and workers. Strategic goals, priorities and tactics for accomplishing them are reevaluated and updated by management as new program information becomes available. Impediments to progress are identified and addressed promptly. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Clear strategic goals have been established for the OHS program based on sound rationale and programmatic needs. These goals have been communicated to most personnel and meaningful performance indicators have been developed. Employees at most levels can articulate how their performance contributes to achieving these goals. Management drives continuous improvement of the OHS program with the benefit of performance measures, progress reports and input from the OHS staff, supervisors, and workers. Strategic goals, priorities and tactics for accomplishing them are reevaluated and updated by management as new program information becomes available. Impediments to progress are identified and addressed without delay. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Strategic goals have been established for the OHS program but they are sometimes general in nature and not clearly based on the specific needs of the organization. Meaningful performance indicators for all the goals have not been developed or are not being consistently monitored. A majority of employees are generally aware of these strategic goals but have difficulty articulating how their performance contributes to achieving these goals. Management supports continuous improvement of the OHS program but it does not appear to be a priority and strategic goals, priorities and tactics for accomplishing them are seldom reevaluated or updated. Impediments to progress are identified but are generally are not always addressed in a prompt and effective manner. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Few strategic goals have been established for the OHS program even though definite program improvements are warranted. Where goals do exist, meaningful performance indicators have not been developed or are not being consistently monitored. Most employees are not aware of any strategic goals and have difficulty articulating how their performance contributes to achieving these goals. Continuous improvement of the OHS program does not appear to be a priority with management and leadership is lacking. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* No system exists for identifying or adopting key strategic OHS goals necessary to an effective OHS program and a workplace free of recognized hazards. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 4. Evaluation and Analysis

Assessed Element: (iii) Data Analysis, Performance Metrics, Management Review/Follow-up

OHS Section Goal: The effective safety and health program has set objectives and developed quantified performance indicators based on issues that offer the greatest opportunity for program improvement and risk reduction.

Recommended Performance Metric(s): Evidence of an annual safety program action plan with measurable objectives, quantifiable performance indicators, reports to managers and employees on accomplishment of objectives, and revised objectives when appropriate.

Interviewees: Bureau managers, Supervisors, OHS staff, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Safe Operating Procedures -OHS (SHARE) objectives HARE goal monitoring -Action plans
-Safety and health program objective records -Objective implementation plans -OHS correspondence -Data analysis
-Briefings and action plans

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Verification of OHS objective implementation (as applicable)

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Has the Designated Agency Safety and Health Official provided assistance to the Director in establishing Goals and objectives for reducing and eliminating occupational accidents, injuries, and illnesses? _____
2. Does the bureau have clear, measurable, goals and objectives? _____
3. Are the goals and objectives communicated throughout the organization? _____
4. Is emphases placed on the critical few objectives that will provide the greatest improvement in employee safety and health and risk reduction? _____
5. Are managers/employees aware of their responsibilities and goals under the SHARE or other national initiatives? _____
6. Does the bureau evaluate success in achieving established goals and objectives? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 5: Training and Awareness

Safety and health training, when appropriately and thoroughly integrated into the operational practices of the workplace, provides employees with the information they need to adequately protect themselves and others from potential harm while performing their work duties. Everyone in the workplace must understand and be aware of the potential hazards to which they may be exposed and risks of not following prescribed safety practices. They must also understand the general safety rules of the worksite and how to react in a responsible and organized way in the event of an emergency. Safety and health training is generally considered most effective when well integrated into the standard on-the-job training programs used to improve worker skills for their assigned jobs.

Safety and occupational health training should be commensurate with the employee's job requirements and responsibilities. Personnel who have special safety and occupational health responsibilities require a higher level of training. Supervisors and managers must understand how hazards affect their employees and how to teach and enforce safety practices. The safety and occupational health professionals who evaluate and control safety risks must remain credentialed and maintain their proficiency with new standards and developments in the field. Safety Committee members and Collateral Duty Safety Officers often need to be able to identify concerns beyond the immediate scope of their normal work activities as well as be thoroughly familiar with all the organization's OHS policies and procedures.

Overall, safety and occupational health training should be effective, tailored to the specific needs of the employees and workplace at hand and make the most out of the principles of adult learning. Training should be considered an on-going process and not a one-time event and important learning objectives need to be reiterated on an ongoing basis.

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Component 5: Training and Awareness

(i) Mandatory Safety and Occupational Health Training

All personnel must be aware of their safety and occupational health duties and responsibilities and must be trained accordingly. To be effective, training should be commensurate with the kinds of potential workplace hazards associated with the workplace and include fundamental principles of hazard control, identification of workplace hazards, use of personal protective equipment (PPE), emergency evacuation procedures, and any other emergency action plan relevant to the worksite. Personnel should also be familiar with the OHS responsibilities of others in the bureau who affect their organization, as the safety of every individual is dependent upon the actions and activities of others who share the workplace. This shared responsibility is particularly true in emergency situations where mutual understanding of actions to be taken can be critical.

The level and complexity of training should depend on the nature of the work being performed, the types of facilities involved and on the nature of the potential hazards of the worksite. Training can be most effective when integrated into other training about performance requirements and general job practices. Safety and occupational health training should not be considered optional due to the extreme consequences that can result from a lack of awareness of OHS policies and procedures. Individual employee training requirements and records must be kept up-to-date and monitored for deficiencies.

(1) <u>Documents and Records Review</u>:

(a) Education/training requirements (such as a 'required employee training matrix') can be reviewed to identify the types and frequency of training that is to be provided to employees based on specific job descriptions, work areas, tasks performed, job requirements, etc.
(b) Training records – Records of training should reflect training content, learning objectives, attendance, and, as appropriate, student feedback, instructor evaluations, etc.
(c) Budgets and staffing for training can be reviewed to determine if the financial commitment has been made by management for health and safety training.
(d) Written emergency procedures should be reviewed to facilitate interviews with employees, managers, and supervisors (i.e., to help ascertain their familiarity, degree of retention, etc.).
(e) Job Hazard Analyses program can provide insight into the nature of the specific training for 'on-the-job' tasks.
(f) Job descriptions - Written job descriptions can describe health and safety duties and responsibilities for managers, supervisors, and employees and be the basis for 'training matrices' or equivalent.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to share the policies on OHS training and how the organization informs employees of their responsibilities and rights.

(b) *Supervisors* can discuss how and when employees are provided OHS training, how they are kept informed of their employees' training status, and what they need to do if an employee has not completed requisite training.
(c) *OHS staff* can discuss how OHS training requirements are established for different employees, how the curriculum is developed, and the overall effectiveness of the training program.
(d) *OHS Safety Committee Members* can discuss how training relates to specific Safety Committee issues currently being addressed.
(e) *Employees and Union Representatives* should be able to discuss what OHS training they've received as a new employee and throughout their career at DOI, whether they feel the training was effective and met their specific needs, and recommendations for training program enhancement. They can also discuss what they have been instructed to do in case of an emergency.

(3) <u>Potential Interview Questions</u>:

(a) Who receives basic health and safety orientation training and what does that training encompass?
(b) Does the bureau provide specialized job safety and health training appropriate to the work performed by the employee?
(c) What responsibilities do supervisors have for deciding the types of training their employees receive? For ensuring that their employees actually fulfill their training requirements?
(d) To what extent is OHS training integrated into job-specific training?
(e) What is management's commitment to OHS training? Is the budget adequate?
(f) What system is used to track who receives what training? What records are retained? How are training materials/ curriculum updated? Who is responsible for this?

(4) <u>Observations</u>:

(a) Training classes are scheduled and being conducted.
(b) Employees appear alert to safety and health issues and can respond quickly to questions about health and safety practices in an emergency.
(c) Emergency and safety guidelines are posted as a reinforcement of what is learned in health and safety training.
(d) Employees appear to be well versed in performing their work safely and using their PPE properly.
(e) The OSHA poster is prominently displayed.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual - Chapter 13 Safety and Health Training

29 CFR 1960.54 Each agency shall provide top management officials with orientation and other learning experiences which will enable them to manage the occupational safety and health programs of

their agencies. Such orientation should include coverage of section 19 of the Act, Executive Order 12196, the requirements of this part, and the agency safety and health program.

29 CFR 1960.55(a) Each agency shall provide occupational safety and health training for supervisory employees that includes: supervisory responsibility for providing and maintaining safe and healthful working conditions for employees, the agency occupational safety and health program, section 19 of the Act, Executive Order 12196, this part, occupational safety and health standards applicable to the assigned workplaces, agency procedures for reporting hazards, agency procedures for reporting and investigating allegations of reprisal, and agency procedures for the abatement of hazards, as well as other appropriate rules and regulations.

29 CFR 1960.55(b) This supervisory training should include introductory and specialized courses and materials which will enable supervisors to recognize and eliminate, or reduce, occupational safety and health hazards in their working units. Such training shall also include the development of requisite skills in managing the agency's safety and health program within the work unit, including the training and motivation of subordinates toward assuring safe and healthful work practices.

29 CFR 1960.56(a) Each agency shall provide occupational safety and health training for safety and health specialists through courses, laboratory experiences, field study, and other formal learning experiences to prepare them to perform the necessary technical monitoring, consulting, testing, inspecting, designing, and other tasks related to program development and implementation, as well as hazard recognition, evaluation and control, equipment and facility design, standards, analysis of accident, injury, and illness data, and other related tasks.

29 CFR 1960.56(b) Each agency shall implement career development programs for their occupational safety and health specialists to enable the staff to meet present and future program needs of the agency.

29 CFR 1960.57 Each agency shall provide training for safety and health inspectors with respect to appropriate standards, and the use of appropriate equipment and testing procedures necessary to identify and evaluate hazards and suggest general abatement procedures during or following their assigned inspections, as well as preparation of reports and other documentation to support the inspection findings.

29 CFR 1960.58 Within six months after October 1, 1980, or on appointment of an employee to a collateral duty position or to a committee, each agency shall provide training for collateral duty safety and health personnel and all members of certified occupational safety and health committees commensurate with the scope of their assigned responsibilities. Such training shall include: The agency occupational safety and health program; section 19 of the Act; Executive Order 12196; this part; agency procedures for the reporting, evaluation and abatement of hazards; agency procedures for reporting and investigating allegations of reprisal, the recognition of hazardous conditions and environments; identification and use of occupational safety and health standards, and other appropriate rules and regulations.

29 CFR 1960.59(a) Each agency shall provide appropriate safety and health training for employees including specialized job safety and health training appropriate to the work performed by the employee, for example: Clerical; printing; welding; crane operation; chemical analysis, and computer

operations. Such training also shall inform employees of the agency occupational safety and health program, with emphasis on their rights and responsibilities.

29 CFR 1960.59(b) Occupational safety and health training for employees of the agency who are representatives of employee groups, such as labor organizations which are recognized by the agency, shall include both introductory and specialized courses and materials that will enable such groups to function appropriately in ensuring safe and healthful working conditions and practices in the workplace and enable them to effectively assist in conducting workplace safety and health inspections. Nothing in this paragraph shall be construed to alter training provisions provided by law, Executive Order, or collective bargaining arrangements.

29 CFR 1960.60(a) Agency heads may seek training assistance from the Secretary of Labor, the National Institute for Occupational Safety and Health and other appropriate sources.

29 CFR 1960.60(b) After the effective date of Executive Order 12196, the Secretary shall, upon request and with reimbursement, conduct orientation for Designated Agency Safety and Health Officials and/or their designees which will enable them to manage the occupational safety and health programs of their agencies. Such orientation shall include coverage of section 19 of the Act, Executive Order 12196, and the requirements of this part.

29 CFR 1960.60(c) Upon request and with reimbursement, the Department of Labor shall provide each agency with training materials to assist in fulfilling the training needs of this subpart, including resident and field training courses designed to meet selected training needs of agency safety and health specialists, safety and health inspectors, and collateral duty safety and health personnel. These materials and courses in no way reduce each agency's responsibility to provide whatever specialized training is required by the unique characteristics of its work.

29 CFR 1960.60(d) In cooperation with OPM, the Secretary will develop guidelines and/or provide materials for the safety and health training programs for high-level managers, supervisors, members of committees, and employee representatives.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* A comprehensive and organization-specific training program exists for managers, supervisors, and employees and covers all required as well as recommended training appropriate to the job description and work environment. Employees report that top management understands their need for OHS training and provides adequate budgetary resources. There is good rationale behind the training requirements associated with various positions, work activities, and facilities. All newly assigned employees receive general occupational health and safety orientation in topics such as how to report OHS-related concerns, emergency preparedness, and overall responsibilities. In addition, all employees receive specific training on the hazards they may be exposed to at their workplace, the measures required to protect themselves, and workplace-specific OHS policies and procedures. Employees interviewed can explain precisely what they must do in different types of credible emergencies including how to properly handle any hazardous materials in the workplace. Supervisors receive training in their responsibilities for worker safety and occupational health, are thoroughly aware of hazards associated with jobs under their supervision, and embrace their role of teacher and enforcer of OHS policies. Appropriate safety and occupational health procedures and

information (e.g., JHAs, MSDSs) are always provided to personnel before they are given new work assignments. All appropriate training records are effectively maintained. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds*. An organization-specific training program exists for managers, supervisors, and employees and covers all required training. Employees report that top management understands their need for OHS training and provides adequate budgetary resources. There is good rationale behind the training requirements associated with various positions, work activities, and facilities. Most newly assigned employees receive general occupational health and safety orientation. In addition, most employees receive specific training on the hazards they may be exposed to at their workplace, the measures required to protect themselves, and workplace-specific OHS policies and procedures. Employees interviewed can explain what they must do in different types of credible emergencies. Supervisors receive training in their responsibilities for worker safety and occupational health, are aware of hazards associated with jobs under their supervision, and understand their role as teacher and enforcer of OHS policies. Appropriate safety and occupational health procedures and information are routinely provided to personnel before they are given new work assignments. Training records are effectively maintained. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* A training program exists for managers, supervisors, and employees and covers most required training. Employees report that top management generally understands their need for OHS training but budgetary resources are sometimes scarce. Training requirements have been associated with various positions, work activities, and facilities but a systematic process for determining this is not being used. Most newly assigned employees receive general occupational health and safety orientation. In addition, most employees receive specific training on the hazards they may be exposed to at their workplace, the measures required to protect themselves, and workplace-specific OHS policies and procedures, although this training is sometimes delayed or not always effective. Employees interviewed can generally explain what they must do in different types of credible emergencies. Supervisors are aware of hazards associated with jobs under their supervision and generally understand their role as teacher and enforcer of OHS policies. Appropriate safety and occupational health procedures and information are usually provided to personnel before they are given new work assignments, but lapses have occurred which have resulted in OHS-related mishaps or violations of policies. There is a system for maintaining training records but it is not always followed. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* A training program is in the process of being established. Employees report that top management has generally lacked understanding of their need for OHS training and budgetary resources are usually scarce. Little attempt has been made to associate training requirements with the various positions, work activities, and facilities in the organization. Many newly assigned employees do not receive a general occupational health and safety orientation or job-specific training in a timely fashion. Employees have difficulty explaining what they must do in different types of credible emergencies. Supervisors are sometimes unaware of hazards associated with jobs under their supervision and do not generally understand their role as teacher and enforcer of OHS policies. Appropriate safety and occupational health procedures and information are generally not provided to personnel before they are given new work assignments. The system for maintaining

training records is not effective. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* A program for mandatory employee OHS training does not exist in this organization. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 5. Safety and Occupational Health Training

Assessed Element: (i) Mandatory Safety and Occupational Health Training.

OHS Section Goal(s): All employees are provided appropriate safety and health training to conduct their work in a safe manner.

Recommended Performance Metric(s): Evidence that training is available and delivered that address hazards affecting employees

OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 13 Safety and Health Training

Interviewees: Managers, Supervisors, OHS Safety committee members, OHS staff, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Education and training plans
-Training program for employees with safety and health responsibility
-Education/training plans
-Budgets and staffing for training new employees/new supervisors
-Training records
-Who requires training vs. who received

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Physical observations to verify if OHS practices are followed (as applicable)

Processes/Evaluation Criteria: (Rank 1-5)

1. All employees, including new employees receive basic safety and health training that includes employee rights and responsibilities, and the basic safety and health hazards in the workplace? _____
2. Is safety and health training integrated into job specific training and are training records maintained? _____
3. Does the Bureau provide top management officials with safety and health orientation and appropriate training? _____
4. Does the Bureau provide safety and health training for supervisory employees? _____
5. Are representatives of employee groups provided with safety and health training? _____
6. Is a retrievable record keeping system established that provides for appropriate retraining, makeup training, and modifications to training? _____
7. Is all mandatory training identified, provided and current? _____
8. Does the Bureau provide specialized job safety and health training appropriate to the work performed by the employee? ____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

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Component 5: Training and Awareness

(ii) Training for Safety and Occupational Health Professionals

The availability of professional expertise in OHS is critical to maintaining an effective safety and occupational health program and to ensure workplace hazards are properly recognized, evaluated and controlled. Training for occupational health and safety professionals is important to ensuring that these professionals maintain their credentials, are up-to-date on advances in the field, are familiar with changes in OHS regulations and standards of care, and have the benefit of interacting with their peers and other subject matter experts. Adequate financial resources need to be available for staff training and professional development and is an important part of recruiting and retaining an effective OHS staff.

(1) <u>Documents and Records Review</u>:

(a) Organization charts to identify OHS personnel.
(b) Policies and budgets dealing with training/professional development. Evaluate to ascertain whether specialized training, attendance at professional conferences, subscription to technical journals, etc. are encouraged and supported.
(c) Evidence of professional accreditations, licenses, certifications, and specialized training among the OHS staff.
(d) Evidence that the OHS staff are adequately trained and provided the opportunity to acquire and maintain qualifications consistent with nature of workplace hazards, the size of the operations, etc.
(e) Evidence that OHS staff have the ability to consult with and retain (e.g., on a part time basis) outside experts when necessary.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the credentials and qualifications of their OHS staff and how adequate they feel they are in relation to the needs of their organization.
(b) *OHS staff* should be able to provide details about how adequate their training/professional development is given their assigned responsibilities, how effective are the related policies of the organization, whether they have had difficulties getting necessary training approved, etc.

(3) <u>Potential Interview Questions</u>:

(a) Is specialized training provided for safety and occupational health professionals?
(b) How does the organization support continuing education and certification/accreditation of safety and health professionals?
(c) Provide examples of when outside professional expertise is used to advance OHS goals in the organization.
(d) Are members of the OHS staff active in any professional societies? If not, why not?

(4) <u>Observations</u>:

(a) Are there professional certification plaques or training certificates in the offices of the OHS staff?

(b) Does the organization have a good library accessible to the OHS staff (with technical reference materials, standards and regulations, etc.)?

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual – 485 DM Chapter 11 Staffing Safety and Health Positions

Department of Interior Departmental Manual – 485 DM Chapter 12 Professional Development

29 CFR 1960.56(a) Each agency shall provide occupational safety and health training for safety and health specialists through courses, laboratory experiences, field study, and other formal learning experiences to prepare them to perform the necessary technical monitoring, consulting, testing, inspecting, designing, and other tasks related to program development and implementation, as well as hazard recognition, evaluation and control, equipment and facility design, standards, analysis of accident, injury, and illness data, and other related tasks.

29 CFR 1960.56(b) Each agency shall implement career development programs for their occupational safety and health specialists to enable the staff to meet present and future program needs of the agency.

29 CFR 1960.57 Each agency shall provide training for safety and health inspectors with respect to appropriate standards, and the use of appropriate equipment and testing procedures necessary to identify and evaluate hazards and suggest general abatement procedures during or following their assigned inspections, as well as preparation of reports and other documentation to support the inspection findings.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* There is a staff of OHS professionals with qualifications, experience, and training commensurate with the needs of the workplace. Policies reflect that professional development and training is encouraged by management and supervision and adequate financial resources are consistently available for training classes, professional conferences and resource materials. Safety staffs have IDPs in place that encourage professional development. The staff size and workload is such that OHS professionals have the time to take advantage of professional development opportunities. When needed, outside subject matter experts are available to consult. Virtually all the OHS staff persons recognize the value the organization places on obtaining and maintaining professional credentials and seek to do so by taking training classes and attending professional society meetings, etc. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* There is a staff of OHS professionals with qualifications, experience, and training commensurate with the needs of the workplace. Policies generally reflect that professional development and training is encouraged by management and supervision although it is sometimes difficult to secure the financial resources or get the time off to take full advantage of professional development opportunities. Safety staffs have IDPs in place that encourage professional development. Most of the OHS staff persons recognize the value the organization places on obtaining and maintaining professional credentials and seek to do so by taking training classes and attending professional society meetings. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* There is a staff of OHS professionals with most (but not all) of the qualifications, experience, and training necessary to meet the needs of the workplace. Policies generally reflect that professional development and training is appreciated by management and supervision although proactive encouragement is not typically provided. A lack of financial resources (budget) or staff availability sometimes makes it difficult to take advantage of professional development opportunities. There is a general recognition by OHS staff persons that the organization values obtaining/maintaining professional credentials but proactive encouragement is sparse. OHS staff sometimes takes professional development training classes and attend professional society meetings, but this is generally not routine. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* There is a staff of OHS professionals but it frequently doesn't have the qualifications and training necessary to meet the needs of the workplace. Policies reflecting that professional development and training is appreciated by management are lacking and proactive encouragement of professional development is seldom provided. A consistent lack of financial resources (budget) or staff availability makes it difficult to take advantage of professional development opportunities. There is little recognition by OHS staff persons that the organization values obtaining/maintaining professional credentials. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* There is a staff of OHS professionals but it generally doesn't have the qualifications and training necessary to meet the needs of the workplace. No policies exist that foster professional development and training among OHS staff. There is a consistent lack of financial resources (budget) or staff availability that makes taking advantage of professional development opportunities very difficult or impossible. There is virtually no recognition by OHS staff persons that the organization values obtaining/maintaining professional credentials. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 5. Training and Awareness
Assessed Element: (ii) Training for Safety and Occupational Health Professionals
OHS Section Goal: Bureaus have well developed full time safety professional staff.
Recommended Performance Metric(s): Recommended DOI Core Competencies Training provided.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960; Chapter 12 Staffing Safety and Health Positions; Chapter 12 Professional Development
Interviewees: Leadership management and safety and health staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur; Operations where safe-efficient/unsafe-inefficient activities can be witnessed.
Processes/Evaluation Criteria: **(Rank 1-5)** 1. Does professional development encourage certification? _____ 2. Does the Bureau provide specialized training for safety and health professionals? _____ 3. Are safety and health inspectors trained commensurate with assignments? _____ 4. Are safety and occupational health professional trained to operate evaluation equipment? _____ 5. Does the Bureau implement career development programs to meet present and future program staffing needs of the agency? _____ 6. Is career development provided for professional safety and health staff? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

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Component 5: Training and Awareness

(iii)Training for Collateral Duty Safety & Health Officers and Safety Committee Members

Everyone involved in the OHS program should be qualified to help recognize and address occupational health and safety issues and be provided the necessary orientation and training. However, given their increased OHS responsibilities, Collateral Duty Safety and Health Officers (CDSHOs) and safety committee members (SCMs) require a more in-depth level of training. Training should have the objective of providing CDSHOs and SCMs with a technical competency and perspective outside their individual areas of expertise as appropriate to the scope of their assigned OHS duties and responsibilities, the size and complexity of the organization, and the types of operations and facilities present in the organization. Training should address all pertinent OHS policies, procedures, regulations and standards; the recognition, evaluation, and control of hazardous conditions in the various workplaces in question; trend analysis and using statistics and other available information to target inspections to where they are needed most; and proper reporting and follow-up of identified occupational health and safety conditions.

(1) <u>Documents and Records Review</u>:

(a) Safety Committee charter and policies should state the purpose of the committee, define requisite training and expertise, and describe duties and responsibilities of members.
(b) Training records should provide details about the nature of the curriculum provided to CDSHOs and SCMs, who has been trained, and when training has been conducted.

(2) <u>Potential Interviewees</u>:

(a) *Leadership/Management* should be able to discuss the budgetary resources and priorities assigned to CDSHO and SCM training.
(b) *OHS staff* can discuss the technical adequacy of the CDSHO and SCM training based on the specific needs of the organization.
(c) *CDSHOs and SCMs* should discuss how effective they feel the training is based on their assigned duties and the types of potential hazards associated with their operations and workplaces.

(3) <u>Potential Interview Questions</u>:

(a) What OSH-related training did you receive as a SCM or CDSHO? How promptly did you receive this training after being assigned OHS duties? Do you feel your training is adequate? What additional training do you feel would be beneficial?
(b) What training are you currently scheduled for? How frequently are you provided supplemental or 'refresher' training?
(c) Do budgetary constraints or other assignments adversely impact you receiving timely, effective training?

(d) Who defines the training you are required to take? Are they familiar with the workplace and organization for which you are responsible? Is your training tailored accordingly?
(e) What records are kept of your training? Are they complete?
(f) Collateral duty responsibilities are no more than 20 percent of the employees duties.

(4) <u>Observations</u>:

(a) Do SCMs or CDSHOs seem confident in their understanding of what is expected of them and how to perform their duties?
(b) Are training certificates, technical accreditations, etc., prominently displayed in offices and workspaces?
(c) If training classes can be observed, does it appear that attendees are interested and actively participating? Are facilities adequate?

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual - Chapter 11 Staffing Safety and Health Positions and Chapter 12 Professional Development

Department of Interior Departmental Manual - Chapter 28 Collateral Duty Safety/Health Officers

29 CFR 1960.58 Within six months after October 1, 1980, or on appointment of an employee to a collateral duty position or to a committee, each agency shall provide training for collateral duty safety and health personnel and all members of certified occupational safety and health committees commensurate with the scope of their assigned responsibilities. Such training shall include: The agency occupational safety and health program; section 19 of the Act; Executive Order 12196; this part; agency procedures for the reporting, evaluation and abatement of hazards; agency procedures for reporting and investigating allegations of reprisal, the recognition of hazardous conditions and environments; identification and use of occupational safety and health standards, and other appropriate rules and regulations.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Training commensurate with the scope of assigned responsibilities and specific nature of the organization is provided within 90 days of an appointment to a CDSHO or SCM position. Training encompasses the all the DOI core competency training elements, including procedures for the recognition, evaluation, control, reporting, and tracking of hazardous conditions and environments; appropriate use of OHS standards, regulations, policies and procedures; interfacing with management and other organizational groups. Effective training is

also provided in any special technical OHS areas specific to the organization and operations in question as required to fulfill responsibilities. Training is provided in the basic elements of organizing, planning, and managing an effective safety and occupational health program, including how to work effectively in a group or as a team. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds*. Training commensurate with the scope of assigned responsibilities and specific nature of the organization is generally provided within six months of an appointment to a CDSHO or SCM position, although some specialized training might take a bit longer. Training encompasses the DOI core competency training elements, including procedures for the recognition, evaluation, control, reporting, and tracking of hazardous conditions and environments; appropriate use of OHS standards, regulations, policies and procedures; interfacing with management and other organizational groups. Training is also provided in some special technical OHS areas specific to the organization and operations in question but practices regarding such training are currently incomplete and in the process of being established. Training is provided in the basic elements of organizing, planning, and managing an effective safety and occupational health program, including how to work effectively in a group or as a team. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Training is generally provided within one year of an appointment to a CDSHO or SCM position, although some gaps are present with respect to with the scope of assigned responsibilities and specific nature of the organization. Training addresses the DOI core competency training elements in a general fashion but specific application to the organization in question has yet to occur. Limited training is provided in special technical OHS areas specific to the organization and operations. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Training is provided when a CDSHO or SCM is appointed, although significant delays might occur due to factors such as budget or time constraints. Significant gaps in the training are present and CDSHOs and SCMs generally feel unprepared to assume their responsibilities. Training addresses the DOI core competency training elements in a very general fashion and it is difficult to apply the general training to the specific needs of the workplace. Adequate training records are not kept. Overall, training is less than effective and the quality of the OHS program suffers as a result. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* CDSHOs and SCMs receive little or no training for their assigned technical responsibilities and committee functions. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: **5. Training and Awareness**
Assessed Element: (iii) Training for Collateral Duty Safety and Health Officers and Safety Committee members.
OHS Section Goal: Bureaus have well developed CDSHO staff and safety committee members.
Recommended Performance Metric(s): Recommended DOI Core Competencies Training provided.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960; Chapter 12 Staffing Safety and Health Positions; Chapter 12 Professional Development; Chapter 28 Collateral Duty Safety/Health Officers
Interviewees: Leadership management and safety and health staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur; Operations where safe-efficient/unsafe-inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Within six months of an appointment to a collateral duty safety and health position or to a safety committee, does the Bureau provide training commensurate with the scope of their assigned responsibilities? _____ 2. Does the Bureau provide specialized training for CDSHO or committee members? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

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Component 5: Training and Awareness

(iv) Promotion and Awareness Programs

Each organization's OHS program should be promoted among the bureau or office such that all employees are aware of the occupational health and safety goals, how individual and group performance is related to those goals, what their rights and responsibilities are relative to maintaining a safe work environment, and the organization's goal of continuous OSH-related improvement

All employees, including new hires and subcontractors should be notified upon their arrival of the principles and policies of the organization's OHS program especially those most pertinent to the employees' specific workplace and duties. Promotion and awareness of the OHS program should not be a one-time event but be fostered on an ongoing basis.

(1) <u>Documents and Records Review</u>:

(a) Records of tool box safety talks and other informal safety and occupational health briefings given by the bureau or office can indicate how the OHS program is promoted.
(b) New employee/contractor orientation curriculum can provide evidence about how the OHS program is introduced and promoted to employees initially upon assignment.
(c) Publications, posters, newsletters, or other media can demonstrate the visibility the OHS program.
(d) Education/training plans may indicate how OHS program policies are integrated into on-going training professional development.
(e) Safety Week and other related programs.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss how the OHS program is promoted and what efforts are made to ensure employees are aware of the program and its goals.
(b) *Supervisors* should be able to discuss how they work with both new employees and veterans to help them understand and comply with the program and how well their employees embrace its principles and policies.
(c) *OHS staff* should be able to provide details about their role in fostering awareness of the OHS program among employees and how they serve as good examples to others in terms of complying with OHS policies and advancing the goal of continuous improvement.
(d) *Employees and union representatives* should be able to convey how familiar and how involved they are with the OHS program.
(e) *Safety Committee representatives* can share information about their role in promoting the OHS program, plans for future promotional events, and whether current efforts have been effective.
(f) *Recently hired employees and volunteers* can provide a fresh perspective about how OSH values are inculcated.

(3) <u>Potential Interview Questions</u>:

(a) Describe what you know about the OHS program and its goals.
(b) Do you feel this is a culture of occupational health and safety in the workplace?
(c) What training have you received in the area of occupational health and safety? What incentives are provided complying with OHS policies and maintaining a safe worksite?
(d) What safety and occupational health-related publications, posters, newsletters, or other media are available and visible in the workplace?
(e) What technical information, documents, books, standards, codes, periodicals, and publications are made available in the workplace?
(f) Has the bureau conducted any special activities based on injury/illness causal factors?

(4) <u>Observations</u>:

(a) Posters, signs and other materials that contain OHS-related information (e.g., "work hours without a recordable injury" logs, "Safety First" posters, etc.)

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational health and safety program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual - Chapter 1 Authority, Purpose, Policy

Department of Interior Departmental Manual - Chapter 2 Responsibilities

Department of Interior Departmental Manual - Chapter 4 Safety and Health Standards, Procedures and Guidelines

29 CFR 1960.11 Each agency head shall ensure that any performance evaluation of any management official in charge of an establishment, any supervisory employee, or other appropriate management official, measures that employee's performance in meeting requirements of the agency occupational safety and health program, consistent with the employee's assigned responsibilities and authority, and taking into consideration any applicable regulations of the Office of Personnel Management or other appropriate authority. The recognition of superior performance in discharging safety and health responsibilities by an individual or group should be encouraged and noted.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* All employees are provided with occupational health and safety information upon hire including pertinent, job-specific OHS policies and procedures. On-going employee training programs integrate OHS program information as a way to reinforce recognition and awareness of workplace hazards and the means to control them. The organization provides

safety and occupational health related publications, posters, newsletters, or other media and these are posted in visible locations and/or are readily available. Employees and managers can articulate key occupational health and safety goals and identify how they are relevant to their work areas. Special incentives and recognitions are provided for advancing OHS program goals. Managers have received formal training in OSH management and continually reinforce the OHS roles and responsibilities of all employees. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Virtually all employees are provided with occupational health and safety information upon hire including pertinent, job-specific OHS policies and procedures. Most on-going employee training programs integrate OHS program information as a way to reinforce recognition and awareness of workplace hazards and the means to control them. The organization provides safety and occupational health related publications, posters, newsletters, or other media and these are posted in visible locations and/or are readily available. Most employees and managers can articulate key occupational health and safety goals and identify how they are relevant to their work areas. Special incentives and recognitions are sometimes provided for advancing OHS program goals. Managers have received formal training in OSH management and reinforce the OHS roles and responsibilities of employees. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Most employees are provided with pertinent occupational health and safety information but this might not occur promptly and is not always job-specific. Most on-going employee training programs integrate OHS program information, but some notable programs that should do not. The organization provides some safety and occupational health related publications, posters, newsletters, or other media and these are posted in visible locations and/or are readily available. Employees and managers can generally articulate occupational health and safety goals but often cannot identify how they are specifically relevant to their work areas. Special incentives and recognitions are sometimes provided for advancing OHS program goals. Managers have received some training in OSH management and generally reinforce the OHS roles and responsibilities of employees. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Employees are not generally provided with job-specific occupational health and safety information and on-going employee training programs do not make a point to integrate OHS program information. Safety and occupational health related publications, posters, newsletters, or other media are usually not available. Employees and managers are generally unable to articulate occupational health and safety or how they are specifically relevant to their work areas. Special incentives and recognitions are seldom provided for advancing OHS program goals. Managers do not generally reinforce the OHS roles and responsibilities of employees. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* There is a lack of awareness of the OHS program among the organization's employees and an effective promotional program does not exist. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 5. Training and Awareness
Assessed Element: (iv) Promotional and Awareness Programs.
OHS Section Goal: Effective means are established to inform all employees of safety and health information and promote safety and health program awareness.
Recommended Performance Metric(s): Assessment indicates adequate safety awareness
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 1 Authority, Purpose, Policy**;** Chapter 2 Responsibilities; Chapter 4 Safety and Health Standards, Procedures and Guidelines
Interviewees: Managers, Supervisors, OHS Safety committee members, OHS staff, Employees and Union representatives **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Does the Bureau provide safety and health related publications, posters, newsletters, or other media? _____ 2. Does the Bureau provide technical information, documents, books, standards, codes, periodicals, and publications? _____ 3. Has the Bureau conducted any special activities based on injury/illness causal factors? _____ 4. Are employees involved through the use of incentive or other promotional programs? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

A comprehensive OHS program consists of policies, procedures, plans and protocols that provide for a workplace where all recognized hazards are promptly identified, evaluated, and controlled. An OHS program is more than words on a page; it must be effectively implemented "on the ground" in order to protect employees, visitors and contractors from existing, potential or future hazards. The program must have in place adequate resources responsible managers, responsive supervisors, knowledgeable safety and health professionals, and motivated employees who all recognize their crucial role in fostering a safe and healthful workplace.

Since the specific occupational health and safety needs of a workplace may vary from organization to organization, the manner in which an OHS program is implemented must be flexible within the DOI but also incorporate universal principles such as clearly written requirements tailored to the workplace at hand and communicated through meaningful training and education programs, sound mechanisms to oversee and enforce program requirements, and effective ways to address new or changing conditions. In all cases, OHS programs should foster more than just compliance but continuous improvement and a dedication among all those involved to an injury and illness-free workplace.

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

(i) Accident Reporting and Investigation

An effective safety and occupational health program must ensure that accidents and 'near miss' incidents are promptly reported and investigations are effectively carried out so that their causes and means for preventing repetitions are identified. Program policies should clearly indicate how employees are to make reports (formally or informally, as necessary) in order to ensure that the event can be properly understood by those responsible for completing appropriate follow-up actions and investigations. If necessary, immediate "stop work" orders should be given pending resolution of the hazard in question.

The investigation process should include a thorough documentation of available factual information (who, what, where, when) along with a sound evaluation of the personnel, facilities, and multiple circumstances and 'root causes' contributing to the event. Included in the evaluation should be information such as written guidance or procedures for the workplace or operation in question, previous reports of OHS inspections and corrective actions, assigned PPE, training records, etc. Accident investigations should be conducted by trained teams. Importantly, the results of the investigations should be used to plan and implement corrective actions so that similar events in the future will not occur. Results of investigations should be made available to management, employees, OHS staff, the safety committee, and any other organizations within DOI which might have similar operations or conditions.

(1) <u>Documents and Records Review</u>:

(a) Policies, procedures, protocols and guidance related to accident reporting and investigation.
(b) Incident investigation reports (internal and relevant contractor).
(c) First aid logs.
(d) OSHA logs for the prior three years.
(e) Safety Management Information Systems (SMIS) reports.
(f) Joint labor-management committee minutes.
(g) Lost time due to injury and illness reports.
(h) Accident investigation and serious accident investigation training curriculum.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the programmatic requirements of accident reporting and investigation (e.g., who is responsible for what, what policies and procedures are in place).
(b) *Supervisors* should be able to discuss any previous accidents and 'near miss' incidents and the effectiveness of the reporting, investigation, and corrective actions mechanisms.
(c) *OHS staff* can provide technical details about how they participate in investigations, how multiple root causes are considered, and how effective the accident reporting and investigation program is based on previous events.

(d) *Employees and union representatives* should be able to discuss how previous accidents were reported and investigated in their workplaces and whether effective corrective actions resulted. They should also explain whether any employee has the authority to 'stop work' should a serious hazard be observed.
(e) *Facilities staff* can discuss what they must do when they are involved in an accident or 'near misses'.
(f) *Accident investigators* can provide their perspective on how effectively recent accidents have been scrutinized, the cooperation provided by the organization, and whether the results of the investigations are effectively used to mitigate future mishaps.

(3) <u>Potential Interview Questions</u>:

(a) Provide examples of accident and incident investigation reports you have been involved with. What have been the key "lessons learned" from previous events?
(b) Are any accidents or 'near miss' incidents currently being investigated? Who is involved? Have any interim corrective actions been made while the investigation is underway?
(c) In the event of a fatality or severe accident, who must be notified and when?
(d) Describe the accident/'near miss' incident tracking process, including who investigates the accident/incident and how the information about the accident/incident is captured and tracked to completion.
(e) How serious does an accident or 'near miss' need to be before it is reported? Investigated?
(f) How is accident information entered the SMIS?
(g) Describe the process used to identify root causes of accidents/incidents and how this process leads to corrective and preventive measures?
(h) Who reviews the Serious Accident Investigation (SAI) reports?
(i) How are the results of investigations integrated into employee training programs?
(j) What reports are provided to management and the DOI DASHO following a serious accident investigation? What is the process for the review of these reports and for the planning/implementation of corrective actions?

(4) <u>Observations</u>:

(a) The investigator should compare current conditions to the corrective action items resulting from previous incident investigations to determine if necessary changes have been made to prevent recurrence.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual – Chapter 7 – Incident/Accident Reporting/Serious Accident Investigation

29 CFR 1960.29 Accident Investigation - While all accidents should be investigated, including accidents involving property damage only, the extent of such investigation shall be reflective of the seriousness of the accident.

29 CFR 1960.29(b) - In any case, each accident which results in a fatality or the hospitalization of three or more employees shall be investigated to determine the causal factors involved. Except to the extent necessary to protect employees and the public, evidence at the scene of an accident shall be left untouched until inspectors have an opportunity to examine it.

29 CFR 1960.29(c) - Any information or evidence uncovered during accident investigations which would be of benefit in developing a new OSHA standard or in modifying or revoking an existing standard should be promptly transmitted to the Secretary.

29 CFR 1960.29(d) - The investigative report of the accident shall include appropriate documentation on date, time, location, description of operations, description of accident, photographs, interviews of employees and witnesses, measurements, and other pertinent information. A copy of the investigative report required by this section shall be forwarded to the official in charge of the workplace, the appropriate safety and health committee, and the exclusive employee representative, if any. The investigative report shall be made available to the Secretary or his authorized representative on request.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Policies and procedures for reporting and investigating accidents and 'near miss' incidents are in writing and include a clear delineation of responsibilities, schedules, and review/approval processes. These policies and procedures are understood and followed by all. Policies provide for immediate 'stop work' authorization should serious hazards be identified/reported. All reports of lost time, personal injury, property damage, and 'near misses' are evaluated for the need for further investigation and, if deemed appropriate, investigations are promptly and effectively carried out by competent personnel. Investigations focus on addressing root causes rather than assigning blame. Investigations always result in corrective actions (e.g., engineering controls, administrative controls, PPE, improved training, etc.) to prevent future occurrence. Results of investigations are provided to and reviewed by all appropriate management, supervision, and OHS staff. Information is made available to employees upon request. Reports of serious accidents and fatalities are made to OSHA within 8 hours. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds*. Policies and procedures for reporting and investigating accidents and 'near miss' incidents are in writing and include a clear delineation of responsibilities, schedules, and review/approval processes. These policies and procedures are understood and followed by most. Policies provide for immediate 'stop work' authorization should serious hazards be identified/reported. Most reports of lost time, personal injury, property damage, and near misses are evaluated for the need for further investigation and, if deemed appropriate, investigations are promptly and effectively carried out by competent personnel. Investigations focus on addressing root causes rather than assigning blame. Investigations generally result in some sort of corrective actions (e.g., engineering controls, administrative controls, PPE,

improved training, etc.) to prevent future occurrence. Information is usually provided to appropriate management, supervision, and OHS staff. Results are also made available to employees upon request. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met*. Most policies and procedures for reporting and investigating accidents and 'near miss' incidents are in writing and include a delineation of responsibilities, schedules, and review/approval processes. These policies and procedures are understood and followed by most. Reports of lost time, personal injury, property damage, and near misses are evaluated for the need for further investigation, although this is not always done in a prompt fashion. If deemed appropriate, investigations are carried out by competent personnel and focus on addressing root causes rather than assigning blame. Investigations usually result in corrective actions (e.g., engineering controls, administrative controls, PPE, improved training, etc.) to prevent future occurrence. Results of investigations are provided to and reviewed by appropriate management, supervision, and OHS staff. Results are also made available to employees upon request. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Policies and procedures for reporting and investigating accidents and 'near miss' incidents exist but are not current or thorough and often not understood or followed by employees. Reports of lost time, personal injury, property damage, and near misses are usually not evaluated for the need for further investigation. When investigations are carried out, they are often done in a less then effective manner, in some cases by employees not trained in conducting accident investigations. Investigations usually do not result in prompt corrective actions to prevent future occurrence. Results of investigations are not routinely provided to appropriate management, supervision, OHS staff. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* Effective policies and procedures for reporting and investigating accidents and 'near miss' incidents do not exist. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 6. Program Implementation and Operation
Assessed Element: (i) Accident Reporting and Investigation
OHS Section Goal: An effective program that will provide for prompt reporting and investigation of accidents and "near miss" incidents, so that their causes, and the means for their prevention, are identified.
Recommended Performance Metric(s): Reduce Top Lost Time Injury and Illness Rates for work locations with the highest lost time rates.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 7 Incident/Accident Reporting/Serious Accident Investigation
Interviewees: Selected managers and supervisors, OHS staff, Employees and Union representatives **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Safe Operating Procedures for Incident Investigation and accident review boards -Incident investigation reports -Accident Review Boards -Last 3 years OSHA logs -SMIS reports -Tour facilities/compare conditions to incident investigation action items
Processes/Evaluation Criteria: (Rank 1-5) 1. Are accidents, near miss or other incidents timely entered into the Safety Management Information System (SMIS)? _____ 2. Are reports systematically reviewed by trained safety personnel? _____ 3. Does the Bureau have a protocol for reporting serious accidents and fatalities to OSHA within 8 hours? _____ 4. Are all accidents investigated by the responsible supervisor? _____ 5. Are root causes identified as appropriate and corrective measures to prevent recurrence implemented? _____ 6. Does the Bureau investigate accidents involving property damage only? _____ 7. Is a serious accident investigation team convened for all serious accidents, or incidents, and are serious accident investigation procedures followed? _____ 8. Are the SAI reports reviewed by appropriate officials? _____ 9. Does the Bureau provide the DOI DASHO with a summary report of each fatal and catastrophic accident investigation? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

(ii) Industrial Hygiene and Occupational Medicine

An OHS program which ensures effective worksite inspection and evaluation is a cornerstone to a safe and healthful workplace. This can involve a number of professional disciplines working in concert to recognize, evaluate and control hazards. Chief among these disciplines are industrial hygiene and occupational medicine. According to the American Industrial Hygiene Association, "*industrial hygiene is the science and art devoted to the anticipation, recognition, evaluation, prevention, and control of those environmental factors or stresses arising in or from the workplace which may cause sickness, impaired health and well being, or significant discomfort among workers or among citizens of the community*". Occupational medicine can be defined as "*the branch of medicine that deals with the prevention and treatment of diseases and injuries occurring at work or in specific occupations*".

Both industrial hygiene and occupational medicine rely on worksite inspections and thorough evaluation of information (medical status, exposure characterization data, injury and illness records, regulatory standards, etc.) in order to identify not only existing safety and occupational health hazards but also hazards which may stem from foreseeable changes in conditions, operations, personnel, equipment, and controls. An effective OHS program should ensure that effective policies are in place for such existing or foreseeable hazards to be identified and evaluated initially (baseline), when changes occur, and on an ongoing basis thereafter.

Particularly in the very technical fields of industrial hygiene and occupational medicine, qualified personnel should be brought to bear who are experienced in the specific workplace hazards in question. These personnel can be on the OHS staff or available from contractors or other government agencies (e.g., Federal Occupational Health). In all cases, industrial hygiene and occupational medicine resources should be provided clear and unambiguous roles, responsibilities, and authorities within an organization and have ready access to all the information, workplaces, personnel, and specialized equipment and facilities necessary to carry out these duties. Budgetary resources should be adequate and clear lines of communication should be fostered with management, supervisors, employees, safety committee, and others. Contingencies should be developed for the rapid deployment of these personnel in the event of an emergency (ideally with the participation of the industrial hygienists and occupational physicians in the planning stages).

(1) <u>Documents and Records Review</u>:

(a) Industrial hygiene programs outlining how qualitative and quantitative exposure assessments are performed, how respirators and other PPE are chosen (e.g., hazard determinations), staffing/resourcing plans, etc.

(b) Occupational medicine programs outlining how employees are medically qualified for their jobs (e.g., to wear a respirator, perform physically demanding work, etc.) and medically monitored over time, etc.

(c) Medical care contingency agreement between the organization and nearby medical establishments to provide care in the event of an accident or incident.
(d) Lists of employees in medical surveillance programs, assigned a respirator or hearing protection, subject to fitness for duty requirements or hazardous duty pay, etc.
(e) Emergency plans and procedures.
(f) Workplace records documenting industrial hygiene evaluations such as for ergonomics, hearing conservation, hazardous materials (lead, asbestos, etc.).
(g) Injury and illness records (e.g., CA-1 and 2, OSHA 300 logs, accident/near miss incident investigation reports, etc.).
(h) Records dealing with qualifications, availability, role/responsibilities, etc., of industrial hygiene and occupational medicine resources.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss who they use for industrial hygiene and occupational medicine support, their qualifications, roles/responsibilities, etc.
(b) *Supervisors* can discuss how they interact with industrial hygiene and occupational medicine resources and whether they see this support as beneficial to their workplace.
(c) *OHS staff* can discuss the overall implementation of the occupational medicine and industrial hygiene program and how resources are utilized for this program.
(d) *Employees* can share if they have ever seen or had industrial hygiene sampling done, what chemicals are they exposed to, if they have had first aid/CPR training, and how industrial hygiene results have been communicated.
(e) *Medical and industrial hygiene providers* can discuss the overall implementation of their programs within the organization, how well supported they are by management, the safety committee, unions, etc., how well integrated their programs are in the general work environment, and current priorities and needs.

(3) <u>Potential Interview Questions</u>:

(a) How are industrial hygiene and occupational medicine resources used in this organization (frequency, roles/responsibilities, current initiatives and priorities, names of personnel, etc.)? How effective are these resources?
(b) What health hazards or potential health hazards are currently of concern in the organization? How are these currently being evaluated by industrial hygienists or occupational physicians?
(c) What sorts of changes in conditions, operations, personnel, equipment, and controls are currently foreseeable? How are these changes being addressed by management of the OHS staff?
(d) In what ways do bureau managers respond to occupational health needs?
(e) What medical surveillance requirements are currently in place based on employee exposure?
(f) (For employees) Have you ever reported any early signs or symptoms of job-related illness? Are employees encouraged to make such reports?
(g) What emergency contingencies are in place for occupational medicine and industrial hygiene support?
(h) If you have had a worksite physical or medical testing, how and when were results reported to you? Were you satisfied with the way that the results were explained?
(i) In what ways are the results of industrial hygiene monitoring communicated to employees?

(j) What level of medical personnel are involved in job safety analysis and accident/incident analysis? What type of process do they follow in those analyses?
(k) How does the amount of equipment, trained employees and access to licensed physicians and nurses impact the ability of the medical program to meets its goals?
(l) Describe how onsite or contract medical services and other health and safety professionals cooperate and coordinate.
(m) How are occupational medicine and industrial hygiene personnel involved in worksite surveys?
(n) What guidelines are followed in the industrial hygiene program for sampling, and laboratory analysis?

(4) Observations:

(a) Tour facilities for evidence of unabated health hazards (e.g., unsafe chemical use, unabated noise sources, etc.) not properly addressed by industrial hygiene and/or occupational medicine resources. Observe PPE usage, ventilation systems, and enclosures.
(b) Inspect facilities for new or planned operations needing OHS assessments.
(c) Look for evidence that the medical program has adequate equipment and personnel, including employees trained in first aid and CPR, and access to licensed physicians and nurses nearby.

(5) References:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual - Chapter 17 Industrial Hygiene Program

Department of Interior Departmental Manual - Chapter 18 Occupational Medicine Program

Department of Interior Departmental Manual - Chapter 20 Personal Protective Equipment

DOI Occupational Medicine Handbook

29 CFR 1960 - Program Elements for Federal Employees OSHA

29 CFR 1910.151(a) The employer shall ensure the ready availability of medical personnel for advice and consultation on matters of plant health.

29 CFR 1910.151(b) In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Inspections and evaluations have been performed throughout all the organization's workplaces and all industrial hygiene/occupational health hazards have been identified, evaluated and controlled through engineering, administrative processes, or personal protection equipment. Those workplaces which may have as-yet uncontrolled hazards have firm, detailed plans in place to address the hazards without delay. A sound mechanism is in place to protect all employees in each of the organization's workplaces from hazards stemming from foreseeable changes in conditions, operations, personnel, equipment, and controls and emergencies. All employees assigned to wear respirators or subject to increased or special physical demands are medically qualified. Qualified industrial hygiene and occupational medicine professionals are available to the entire organization and routinely contribute to advancing workplace safety and occupational health goals as necessary based on the nature of the potential hazards in question. Industrial hygiene and occupational medicine equipment, facilities and budgetary resources meet the organization's needs. Industrial hygiene and occupational medicine personnel are readily provided all necessary information, reports, data and facility access to ensure their assigned responsibilities can be effectively completed. Positions with high noise exposures or hearing requirements have base line audiogram requirements. Medical clearance requirements are met. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds*. Inspections and evaluations have been performed throughout most of the organization's workplaces and virtually all of the industrial hygiene/occupational health hazards have been identified, evaluated and controlled through engineering, administrative processes, or personal protection equipment. Those workplaces which may have as-yet uncontrolled hazards have firm, detailed plans in place to address the hazards without delay. A sound mechanism is in place to protect all employees in each of the organization's workplaces from hazards stemming from foreseeable changes in conditions, operations, personnel, equipment, and controls and emergencies. Positions with high noise exposures or hearing requirements have base line audiogram requirements. Medical clearance requirements are met. All employees assigned to wear respirators or subject to increased or special physical demands are medically qualified. Qualified industrial hygiene and occupational medicine professionals are available to most of the organization and routinely contribute to advancing workplace safety and occupational health goals as necessary based on the nature of the potential hazards in question. Industrial hygiene and occupational medicine equipment, facilities and budgetary resources meet the organization's needs. Industrial hygiene and occupational medicine personnel are readily provided all necessary information, reports, data and facility access to ensure their assigned responsibilities can be effectively completed. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Inspections and evaluations have been performed throughout the majority of the organization's workplaces and most of the industrial hygiene/occupational health hazards have been identified, evaluated and controlled through engineering, administrative processes, or personal protection equipment. Those workplaces which may have as-yet uncontrolled hazards have a plan in place to address the hazards. A mechanism is in place to protect employees in most of the organization's workplaces from hazards stemming from foreseeable changes in conditions, operations, personnel, equipment, and controls and emergencies. Positions with

high noise exposures or hearing requirements have base line audiogram requirements. Medical clearance requirements are met. All employees assigned to wear respirators or subject to increased or special physical demands are medically qualified. Qualified industrial hygiene and occupational medicine professionals are available to most of the organization and generally contribute to advancing workplace safety and occupational health goals as necessary based on the nature of the potential hazards in question. Industrial hygiene and occupational medicine equipment, facilities and budgetary resources generally meet the organization's needs. Industrial hygiene and occupational medicine personnel are provided most information, reports, data and facility access necessary to ensure their assigned responsibilities can be completed. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Inspections and evaluations have been performed in some of the organization's workplaces but not all of the industrial hygiene/occupational health hazards have been identified, evaluated and controlled through engineering, administrative processes, or personal protection equipment. A significant number of workplaces have as-yet uncontrolled hazards and ineffective plans in place to address them. Mechanisms are lacking to protect employees from hazards stemming from foreseeable changes in conditions, operations, personnel, equipment, and controls and emergencies. Employees assigned to wear respirators or subject to increased or special physical demands are occasionally not medically qualified. Industrial hygiene and occupational medicine professionals are lacking in availability, qualifications, equipment, facilities and budgetary resources. Industrial hygiene and occupational medicine personnel are not generally provided the information, reports, data and facility access necessary to ensure their assigned responsibilities can be completed. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* An effective industrial hygiene an occupational medicine program does not exist in this organization. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 6. Program Implementation and Operation
Assessed Element: (ii) Industrial Hygiene and Occupational Medicine
OHS Section Goal(s): An occupational health program is appropriate for the nature of the work and its hazards. Policies and procedures are available to all employees.
Recommended Performance Metric(s): Exposure assessments are conducted and corrective actions are implemented
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 17 Industrial Hygiene Program; Chapter 18 Occupational Medicine Program; Chapter 20 Personal Protective Equipment; DOI Occupational Medicine Handbook
Interviewees: Managers, Supervisors, OHS staff and Employees **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -List of employees in medical surveillance programs -Management statements of program design -Lists of employees in medical surveillance programs -Workplace monitoring records -Exposure assessment information in JHAs -Hazardous materials lists **Observations:** Workplaces where physical inspections of facilities may occur and operations where safe-efficient/unsafe-inefficient activities are witnessed. -Tour facilities for existence of health hazards, chemical use, noise sources, etc. and compare to exposure assessments
Processes/Evaluation Criteria: **(Rank 1-5)** 1. Is there documented expectations for monitoring of health hazards? _____ 2. Are bureau managers aware of and responsive to occupational health needs? _____ 3. Does the Bureau have consolidated monitoring data on which they base occupational health decisions? _____ 4. Is the monitoring data collected on a sustained basis, and is statistical analysis on the data performed? _____ 5. Is there an occupational medical surveillance program? _____ 6. Are required medical surveillance program elements based on employee exposure? _____ 7. Are employees encouraged to report early signs or symptoms of perceived job-related illness? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

(iii) Fire Protection and Prevention

An effective OHS program should have systems in place to prevent fires and mitigate adverse effects on persons and property should one occur. These systems should include a comprehensive written fire protection and prevention plan that contains detailed guidelines for conducting inspections for items such as potential fire hazards, emergency egress routes, working emergency lighting fixtures, charged fire extinguishers, posted evacuation plans, and others. Care must be exercised to ensure that work areas are kept free of fire hazards such as accumulated combustible waste materials, open containers of flammable solvents near ignition sources, etc. The use of 'hot work permits' may be necessary for operations such as welding in certain area. Where necessary, memos of understanding should be used with local fire fighters and emergency response units to help ensure readiness and clarify special emergency contingencies such as questions of access, locations of hazardous substances, special firefighting requirements, etc.

All employees must be aware of the fire protection and prevention plan and participate in drills. Procedures for fire emergencies must be practiced until the process of protection and evacuation becomes "second nature" since quick action is essential in a fire emergency and employees need to move quickly without the need to check written procedures.

(1) <u>Documents and Records Review</u>:

(a) Emergency Action Plans that address how to respond to fires at or near the worksite. This may include evacuation and assembly procedures, egress maps, emergency contact phone numbers, drill schedules, and other information that shows that the emergency response system is in place and functional.
(b) Continuity of operations plans.
(c) Memoranda of understanding with local emergency officials.
(d) Reports on previous fire drills, site evacuations, or emergency scenarios that show what actions occurred and how adequate were the protective measures initiated.
(e) Fire protection inspection reports.
(f) SMIS data detailing inspections, industrial hygiene findings, near miss occurrences, etc.
(g) Training records provides evidence of employees have been informed of all emergency response plans and know precisely what they are expected to do in each type of emergency as soon as alerted including PPE requirements.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to describe the emergency action plan related to fires and discuss their health and safety responsibilities related to maintaining a fire safe work environment.
(b) *Supervisors* should identify their responsibilities under the fire protection and prevention plan as it pertains to their area and provide information about required training for fire emergencies,

whether hot work permits are used, and the potential fire hazards associated with their workplace.

(c) *OHS staff* can discuss the overall development and implementation of the fire emergency plan, its perceived adequacy, how compliance with it is assessed in the workplace, upcoming inspections and drills.

(d) Employees should be able to share what they do and where to go in the event of a fire emergency. the cause and outcome of any previous fires in their workplace.

(e) *EMS, AED/CPR and First Aid responders* should be able to describe their familiarly with the workplace in question, anticipated response times, types of emergency equipment and capabilities available, etc.

(f) *Facilities/Maintenance staff* should be able their role in maintaining fire protection-related equipment (alarms, emergency lighting, smoke alarms, fire suppression devices, etc.) and explain the critical equipment shutdown procedures in the event of a fire emergency.

(g) *Program Managers* can discuss how fire protection measures are implemented at their facilities and camps in the field and address emergency contingencies.

(h) *Emergency management staff* should be able to describe the resources devoted to preparing for emergencies, the process used to formulate emergency action plans, and current priorities with regard to ensuring emergency preparedness throughout the organization.

(i) *Law enforcement staff* should be able to describe what role they play in a fire emergency to maintain control and provide direction.

(3) <u>Potential Interview Questions</u>:

(a) When was the last fire hazard analysis conducted of the facilities and operations throughout the organization?

(b) Are the National Fire Codes incorporated into new designs for construction?

(c) How are existing facilities maintained to conform to the National Fire Codes?

(d) What fire emergency response plans have been developed to evacuate, track and protect employees and the public in the event of a fire emergency?

(e) How often are fire evacuation drills conducted?

(f) (For employees) Have you ever reviewed the fire prevention plan? How did you access the plan?

(g) What arrangements exist to coordinate with community emergency organizers and fire responders?

(4) <u>Observations</u>:

(a) Fire prevention and protection plan is available for employee review.

(b) Emergency signage, evacuation route maps, and exit markings are in place and readily apparent.

(c) Shelter-in-place locations and assembly areas are readily apparent.

(d) Emergency supplies and equipment are positioned in strategic locations.

(e) Fire extinguisher tags show that they are inspected on a monthly basis.

(f) Employees appear knowledgeable and confident in the procedures for handling a fire emergency and evacuation.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual - Chapter 19 Fire Safety

Department of Interior Departmental Manual - Chapter 26 Emergency Response Safety

29 CFR 1960 - Basic Program Elements for Federal Employees OSHA

29 CFR 1910.38 (a) Application. An employer must have an emergency action plan whenever an OSHA standard in this part requires one. The requirements in this section apply to each such emergency action plan.

29 CFR 1910.38(b) Written and oral emergency action plans. An emergency action plan must be in writing, kept in the workplace, and available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.

29 CFR 1910.38(c) Minimum elements of an emergency action plan. An emergency action plan must include at a minimum:

1910.38(c)(1) Procedures for reporting a fire or other emergency;
1910.38(c)(2) Procedures for emergency evacuation, including type of evacuation and exit route assignments;
1910.38(c)(3) Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;
1910.38(c)(4) Procedures to account for all employees after evacuation;
1910.38(c)(5) Procedures to be followed by employees performing rescue or medical duties; and
1910.38(c)(6) The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

29 CFR 1910.38(d) Employee alarm system. An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose and comply with the requirements in § 1910.165.

29 CFR 1910.38(e) Training. An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.

29 CFR 1910.38(f) Review of emergency action plan. An employer must review the emergency action plan with each employee covered by the plan:

1910.38(f)(1) When the plan is developed or the employee is assigned initially to a job;

1910.38(f)(2) When the employee's responsibilities under the plan change; and
1910.38(f)(3) When the plan is changed.

29 CFR 1910.39(a) Application. An employer must have a fire prevention plan when an OSHA standard in this part requires one. The requirements in this section apply to each such fire prevention plan.

29 CFR 1910.39(b) Written and oral fire prevention plans. A fire prevention plan must be in writing, be kept in the workplace, and be made available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.

29 CFR 1910.39(c) Minimum elements of a fire prevention plan. A fire prevention plan must include:

1910.39(c)(1) A list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard;
1910.39(c)(2) Procedures to control accumulations of flammable and combustible waste materials;
1910.39(c)(3) Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials;
1910.39(c)(4) The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires; and
1910.39(c)(5) The name or job title of employees responsible for the control of fuel source hazards.

29 CFR 1910.39(d) Employee information. An employer must inform employees upon initial assignment to a job of the fire hazards to which they are exposed. An employer must also review with each employee those parts of the fire prevention plan necessary for self-protection.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* There is a policy for fire prevention and protection plans in operations and facilities within the bureau or office. Formal fire hazard inspections are conducted at least annually and whenever new facilities or operations are planned. In addition to formal inspections, employees keep a sharp eye out for fire hazards in their workplace and conduct informal inspections on an ongoing basis. Deficiencies in fire protection/preparedness procedures, equipment and facilities are addressed as a priority and without delay. Unannounced employee fire and evacuation drills are held at least annually. Employees have access to fire prevention and protection plans, have information about potential fire hazards and precautions associated with their workplaces, and know how to respond to fire alarms. Formal agreements are in place with community emergency organizations and fire fighters have participated in emergency drills and are thoroughly familiar with facilities and operations to the extent necessary to effectively respond. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* There are written fire prevention and protection plans within virtually all of the bureau or offices' operations and facilities. Formal fire hazard inspections are conducted at least annually and whenever new facilities or operations are planned. In addition to formal inspections, employees keep a sharp eye out for fire hazards in their workplace and conduct informal inspections on an ongoing basis. Deficiencies in fire protection/preparedness procedures, equipment and facilities are addressed as a priority and without delay. Unannounced employee fire and evacuation drills are held at least annually. Employees have access to the fire prevention and protection plan, have been informed of any potential fire hazards and precautions associated with their workplace, and know how to respond to fire alarms. Community emergency organizations and fire fighters are thoroughly familiar with facilities and operations to the extent necessary to effectively respond. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met*. There is a fire prevention and protection plan that addresses most of the operations and facilities within the organization. Formal fire hazard inspections are conducted periodically although new facilities or operations are sometimes not addressed in the planning phase. In addition to formal inspections, most employees keep a sharp eye out for fire hazards in their workplace and often conduct informal inspections. Deficiencies in fire protection/preparedness procedures, equipment and facilities are addressed as a priority but there are sometimes delays in implementing corrective actions. Unannounced employee fire and evacuation drills are held periodically. Employees have been generally informed of potential fire hazards and precautions associated with their workplace, and know how to respond to fire alarms. Community emergency organizations and fire fighters are familiar with facilities and operations to the extent necessary to effectively respond. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met*. There is the beginning of a fire prevention and protection plan for the organization but it is not comprehensive and does not address a number of the operations and facilities within the organization. Formal fire hazard inspections are infrequently conducted periodically and new facilities or operations are generally not addressed in the planning phase. The safety culture is such that few employees keep an eye out for fire hazards in their workplace and do not often conduct informal inspections. Deficiencies in fire protection/preparedness procedures, equipment and facilities are not addressed as a priority. Unannounced employee fire and evacuation drills are not held routinely. A significant number of employees have not been informed of potential fire hazards and precautions associated with their workplace, or know how to respond to fire alarms. Community emergency organizations and fire fighters are not very familiar with facilities and operations and this could jeopardize an effective response. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present*. A fire prevention and protection plan has not been effectively developed or implemented for the organization. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 6. Program Implementation and Operation
Assessed Element: (iii) Fire Protection and Prevention
OHS Section Goal(s): Written procedures are established and communicated to employees for their protection.
Recommended Performance Metric(s): Existence of fire protection and prevention plans and evidence of drills and other communications and training for all affected employees.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 19 Fire Safety
Interviewees: Managers, Supervisors, EMS staff, AED/CPR responders, First Aid responders, Program managers and OHS staff, Employees, Emergency Management staff and Law Enforcement **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -Safe Operating Procedures -Emergency Action Plans -Authority delegation -Drills reports -Site inspection reports -SMIS data **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Drills, signage, maps, exit marking, designated shelters, assembly areas -Shelter in place signage and supplies -Posted plans
Processes/Evaluation Criteria: (Rank 1-5) 1. Has a fire hazard analysis been conducted of the facilities and operations under Bureau control? _____ 2. Is fire prevention and protection included in a comprehensive facilities inspection? _____ 3. Are the National Fire Codes incorporated into new designs for construction? _____ 4. Are existing facilities maintained and in conformance with the National Fire Codes? _____ 5. Have fire emergency response plans, primarily concerned with the safety of employees and the public been developed? _____ 6. Are fire evacuation drills conducted as required? _____ 7. Is there a Bureau policy for coordination with the local fire responder? _____ 8. Are there procedures for accounting for all employees and visitors? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

(iv) Occupant Emergency Planning

The OHS program should include emergency preparedness plans for all types of serious potential hazards. These plans should document procedures that are intended to protect employees, visitors and property from the effects of disasters or other unexpected events than can result in serious injury, illness, or lack of operational continuity. Some types of disasters are more likely in some worksite locations due to geography and climate, type of work performed, and conditions of the worksite. However, every worksite should take an "all-hazards" approach to planning for emergencies that include consistent requirements for preparedness, training and communication, evacuation, personal protection, medical care and off-site safety.

All employees should be aware of the organization's emergency plans and be fully trained to assist themselves and others in the event of an emergency. Drills should be conducted at least annually to ensure that emergency responses are "second nature" and will be immediate and precise in an actual emergency. Many disaster situations can extend beyond the facility walls or immediate worksite locale and planning should account for these contingencies. Formal agreements or memoranda of understanding should be in place with community emergency responders to foster familiarity with personnel, facilities and operations in order to maximize the effectiveness of any emergency support provided.

(1) <u>Documents and Records Review</u>:

(a) Emergency Action Plans – These should include:
- Descriptions of various credible emergency scenarios for which planning is a priority for the organization.
- Plans and schedules for conducting training and emergency drills.
- Evacuation procedures including egress plans/maps, rallying locations, etc.
- Organization chart.
- Roles and responsibilities in the event of an emergency.
- Emergency shut down and start up of critical equipment.
- Emergency equipment lists including PPE
- Communications plan and emergency telephone numbers.

(b) Reports of previous emergency responses, drills and site evacuations.
(c) Emergency plan training records.
(d) Continuity of operations plans.
(e) Agreements or memoranda of understanding with local emergency response officials.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to describe the emergency action plan and discuss their responsibilities and those of their staff, in the event of an emergency.

(b) *Supervisors* should identify their responsibilities in the event of an emergency as they pertain to their workplace and provide information about required training for emergencies.
(c) *OHS staff* can discuss the overall development and implementation of the emergency action plan, its perceived adequacy, how compliance with it is assessed in the workplace, upcoming preparedness inspections and drills.
(d) *Employees* should be able to share what they do and where to go in the event of an emergency.
(e) *EMS, AED/CPR and First Aid responders* should be able to describe their familiarly with the workplace in question, anticipated response times, types of emergency equipment and capabilities available, etc.
(f) *Facilities/Maintenance staff* should be able their role in maintaining emergency preparedness-related equipment (alarms, emergency lighting, etc.) and explain the critical equipment shutdown procedures in the event of a emergency.
(g) *Program Managers* can address how their facilities and camps in the field are prepared for emergencies.
(h) *Emergency management staff* should be able to describe the resources devoted to preparing for emergencies, the process used to formulate emergency action plans, and current priorities with regard to ensuring emergency preparedness throughout the organization.
(i) *Law enforcement staff* should be able to describe what role they play in an emergency to maintain control and provide direction.
(j) *Employees – discuss individual preparations for potential emergencies.*

(3) <u>Potential Interview Questions:</u>

(a) What types of credible emergencies have previously affected this organization's operations? What types of emergencies are credible in the future and necessitate planning?
(b) What options have been considered for the protection of employees and property during emergencies?
(c) When were the last two emergency drills conducted? Has a credible emergency scenario drill ever been done?
(d) Who prepared the emergency response plans and reviews drill performance?
(e) How are employees trained to manage their own safety during an emergency event?
(f) What procedures exist for accounting for all employees and visitors during an emergency?
(g) Describe the relationship that exists with community emergency response organizations? How familiar are they with these facilities?
(h) Is an Occupant Emergency Plan available for each building used by this organization? How are employees trained?
(i) Where do you go in an emergency situation? What responsibilities do you have?
(j) What procedures are in place for equipment and facilities shut down in an emergency? What triggers the shutdown?
(k) What mission critical activities does this organization perform for which continuity of operations planning should be done in the event of an emergency?

(4) <u>Observations</u>:

(a) Posted evacuation plans are clear and visible.
(b) Emergency maps, exit markings, shelter designations, and assembly areas are readily apparent.
(c) Alarm enunciators are evident throughout the facilities.

(d) Emergency supplies (e.g., quick escape respirators, etc.) are intact and located in strategic areas, as appropriate.
(e) Employees appear knowledgeable and confident in the procedures for handling a fire emergency and evacuation.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual – 485 DM Chapter 19 Fire Safety

Department of Interior Departmental Manual – 485 DM Part 900.

29 CFR 1960 - Basic Program Elements for Federal Employees OSHA

29 CFR 1910.38(a) Application. An employer must have an emergency action plan whenever an OSHA standard in this part requires one. The requirements in this section apply to each such emergency action plan.

29 CFR 1910.38(b) Written and oral emergency action plans. An emergency action plan must be in writing, kept in the workplace, and available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.

29 CFR 1910.38(c) Minimum elements of an emergency action plan. An emergency action plan must include at a minimum:

1910.38(c)(1) Procedures for reporting a fire or other emergency;
1910.38(c)(2) Procedures for emergency evacuation, including type of evacuation and exit route assignments;
1910.38(c)(3) Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;
1910.38(c)(4) Procedures to account for all employees after evacuation;
1910.38(c)(5) Procedures to be followed by employees performing rescue or medical duties; and
1910.38(c)(6) The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

29 CFR 1910.38(d) Employee alarm system. An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose and comply with the requirements in § 1910.165.

29 CFR 1910.38(e) Training. An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.

29 CFR 1910.38(f) Review of emergency action plan. An employer must review the emergency action plan with each employee covered by the plan:

1910.38(f)(1) When the plan is developed or the employee is assigned initially to a job;
1910.38(f)(2) When the employee's responsibilities under the plan change; and
1910.38(f)(3) When the plan is changed.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* There is a written occupant emergency plan that addresses all of the operations and facilities within the organization and is suitable for all anticipated emergencies, such as explosions, fire, toxic chemical release, natural and weather-related disasters, and bomb threats. Written emergency procedures cover all required elements. Preparedness assessments are conducted at least annually and deficiencies in procedures, equipment and facilities are addressed as a priority and without delay. Unannounced employee evacuation drills are held at least annually. Employees have access to the occupant emergency plan, have been trained in its requirements, and demonstrate a thorough understanding of what they need to do in the event of an emergency. Community emergency organizations and fire fighters are thoroughly familiar with facilities and operations to the extent necessary to effectively respond. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* There is a written occupant emergency plan that addresses virtually of the operations and facilities within the organization and is suitable for most anticipated emergencies, such as explosions, fire, toxic chemical release, natural and weather-related disasters, and bomb threats. Written emergency procedures cover the required elements. Preparedness assessments are conducted at least annually and deficiencies in procedures, equipment and facilities are promptly addressed. Unannounced employee evacuation drills are held at least annually. Employees have access to the occupant emergency plan, have been trained in its requirements, and demonstrate an understanding of what they need to do in the event of an emergency. Community emergency organizations and fire fighters are familiar with facilities and operations to the extent necessary to effectively respond. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met*. There is an occupant emergency plan that addresses most of the operations and facilities within the organization and is suitable for most anticipated emergencies, such as explosions, fire, toxic chemical release, natural and weather-related disasters, and bomb threats. Emergency procedures exist which cover the required elements although some are outdated or incomplete. Preparedness assessments are conducted every several years and deficiencies in procedures, equipment and facilities are addressed, although not as a priority. Most employees, but not all, have access to the occupant emergency plan, have been trained in its requirements, and demonstrate an understanding of what they need to do in the event of an emergency. Community emergency organizations and fire fighters are generally familiar with facilities and operations. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* There is the beginning of an occupant emergency plan and it addresses some of the operations and facilities within the organization. However, it is not really suitable for some of the most anticipated emergencies. Emergency procedures are outdated or incomplete. Preparedness assessments are not conducted in a manner which would ensure that procedures, equipment and facilities are effective in the event of an emergency. Most employees do not have access to the occupant emergency plan, have not been trained in its requirements, and cannot adequately demonstrate an understanding of what they need to do in the event of an emergency. Community emergency organizations and fire fighters are generally unfamiliar with facilities and operations. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* An effective occupant emergency plan does not exist for this organization. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 6. Program Implementation and Operation
Assessed Element: (iv) Occupant Emergency Planning (Other than fire)
OHS Section Goal(s): Written procedures are established and communicated to employees for their protection and evacuation in the event of a unexpected or disastrous event, inclusive of training and conducting drills annually.
Recommended Performance Metric(s): Existence of Employee Emergency Action plans and evidence of drills and other communications and training for all affected employees
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 19 Fire Safety
Interviewees: Managers, Supervisors, -EMS staff, AED/CPR responders, First Aid responders, Program managers and OHS staff, Employees, Emergency Management staff and Law Enforcement **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -Safe Operating Procedures -Emergency Action Plans -Authority delegation -Drills reports -Site inspection reports -SMIS data **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Drills, signage, maps, exit marking, designated shelters, assembly areas -Shelter in place signage and supplies -Posted plans
Processes/Evaluation Criteria: (Rank 1-5) 1. Are the types of hazards that could affect bureau operations identified? _____ 2. During the emergency event, management has considered options for protecting employees and property? _____ 3. Have safety responsibilities been identified in the Incident Command System? _____ 4. Have emergency drills been conducted as required? _____ 5. Are emergency response plans and drill performance reviewed by qualified professionals? _____ 6. Are employees trained in emergency procedures, to manage their own safety during an emergency event? _____ 7. Are there procedures for accounting for all employees and visitors? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

(v) Motor Vehicles and Motorized Equipment

A wide variety of motor vehicles and motorized equipment is operated by the DOI. Improper or untrained use can result in catastrophic accidents impacting not only the operator but others as well (e.g., passengers, pedestrians, coworkers, etc.). Use of bureau vehicles/equipment must be restricted only to authorized, trained, and competent employees. Written operating procedures must be established and effectively communicated properly to employees.

All vehicles/equipment must be inspected and maintained in safe and operable condition. When items are found to be broken, missing, or otherwise deficient, corrective actions must be taken without delay to avoid any adverse safety consequence. Every accident must be promptly reported using the proper forms and notification mechanisms. Where accidents, unsafe acts, or policy/regulation violations occur, effective actions should be taken to minimize recurrence, such as providing additional training, issuing citations or penalties, or even reassignment or dismissal of personnel. re-tooling of equipment

(1) <u>Document and Records Review</u>:

(a) Safe Operating Procedures for motorized vehicles and equipment.
(b) Pre-use inspection check sheets (including on-board safety equipment lists, operator inspection criteria, etc.).
(c) Employee training records, competency documentation, and driving history records.
(d) Accident/incident records.
(e) Equipment maintenance checklists, protocols and inspection logs.
(f) State driver's licenses – These can be spot checked to verify minimum requirements.
(g) Special requirements and regulations pertinent to the motorized vehicles/equipment in question (e.g., state, local and federal safety regulations, special licensing requirements, etc.).
(h) Training records.

(2) <u>Potential Interviewees</u>:

(a) *Managers* should be able to discuss the general elements of the motorized vehicles and equipment program.
(b) *Supervisors* should be able to share how employee operators are trained to use motorized vehicles and equipment safely, report mishaps, and ensure proper inspection and maintenance is conducted according to appropriate schedules.
(c) *OSH staff* can discuss how the motorized vehicle/equipment training curriculum was developed, notable mishaps which have occurred in the past and any perceived trends, and how lessons learned are being used to effect positive change.
(d) *Employees and union representatives* should be able to describe the training they receive, how to report an motor vehicle accident, how well they believe the inspection and maintenance program is working, and, overall, how effective they think the safety program is when it comes to motorized vehicle/equipment operation.

(e) Vehicle, UTV, ATV and other equipment operators.

(3) <u>Potential Interview Questions</u>:

(a) What sorts of motor vehicles or motorized equipment do employees operate? Do any require any special licensing or demonstration of competency per governmental regulations or Bureau policies (e.g., forklifts, drill rigs, all-terrain vehicles, snowmobiles, vehicles with greater than 1-ton capacity, towing vehicles, hazardous material hauling, chauffeuring, etc.)?
(b) How often are employee driver records verified and who does the verification?
(c) Is there a policy requiring mandatory use of seat belts and restricting use of cellular phones? If so, how are such policies enforced?
(d) What PPE is required for employees when operating specialized vehicles or equipment (e.g., hearing protection, hard hats, protective footwear, etc.)?
(e) What special training or certifications are available to employees for more advanced driving techniques (e.g., defensive driving training)?
(f) How are periodic and pre-use vehicle safety inspections conducted? Where are the inspection documents located?
(g) Describe the preventative maintenance performed on vehicles and motorized equipment?
(h) How are deficiencies reported and corrected (e.g., broken or missing parts, etc.)?
(i) Is there a policy to maintain a motor vehicle accident kit within motor vehicles? What does this consist of?

(4) <u>Observations</u>:

(a) Vehicles and motorized equipment appear to be operated safely by trained employees.
(b) Written safe operating procedures are readily available and used by persons authorized to operate vehicles and motorized equipment.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

29 CFR 1960 - Program Elements for Federal Employees OSHA

Department of Interior Departmental Manual - Chapter 16 Motor Vehicle Safety

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Written procedures are established and communicated to employees for the safe operation of all motorized vehicles and motorized equipment. All operators are properly trained and can demonstrate competency with the equipment being operated. The organization requires all appropriate licenses, qualifications and credentials in accordance with governmental regulations and bureau policies. For motor vehicle operators, driving records are

verified initially and at least annually. The organization has policies requiring mandatory use of seat belts and restricting the use of cellular phones and texting devices, and these policies are diligently enforced. Operators of specialized vehicles (snowmachines, ATVs, UTVs, Segways, etc.) have appropriate training and properly wear PPE, as called for by safety policies and procedures. Defensive driving training is available for employees. There are written policies for conducting and documenting inspections and preventive maintenance and these policies are rigorously followed. There is documentation showing that an effective system is in place for identifying, reporting, and correcting deficiencies in vehicles or equipment such as broken parts, missing safety equipment, etc. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Written procedures are established and communicated to employees for the safe operation of all motorized vehicles and motorized equipment. Most operators are properly trained and can demonstrate competency with the equipment being operated. The organization requires all appropriate licenses, qualifications and credentials in accordance with governmental regulations and bureau policies. For motor vehicle operators, driving records are verified upon assignment. The organization enforces policies requiring mandatory use of seat belts and restricting the use of cellular phones and texting devices. Employees generally wear PPE when operating specialized vehicles, as called for by safety policies and procedures. There are written policies for conducting and documenting inspections and preventive maintenance and these policies are followed for the most part. There is an effective system for identifying, reporting, and correcting deficiencies in vehicles or equipment such as broken parts, missing safety equipment, etc. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Written procedures exist and are generally communicated to employees for the safe operation of motorized vehicles and motorized equipment. Most operators are properly trained and can demonstrate competency with the equipment being operated. The organization requires all of the appropriate licenses, qualifications and credentials in accordance with governmental regulations and bureau policies but occasionally equipment is operated by employees without them. For motor vehicle operators, driving records are sometimes not verified upon assignment. The organization has policies requiring mandatory use of seat belts and restricting the use of cellular phones and texting devices but there is not always a consistent enforcement of this across the organization. Employees generally wear PPE when operating specialized vehicles, as called for by safety policies and procedures, but occasionally there are lapses or it is not worn properly. There are policies for conducting inspections and preventive maintenance but these policies are not always followed. There is a system for identifying, reporting, and correcting deficiencies in vehicles or equipment such as broken parts, missing safety equipment, etc., but occasionally the system breaks down resulting in delays or other problems. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Some procedures exist for the safe operation of motorized vehicles and motorized equipment, but they are often incomplete and not effectively communicated to employees. Operators are somewhat competent to operate their equipment, but additional or improved training would enhance competencies. Occasionally equipment is operated by employees without all of the appropriate licenses, qualifications and credentials needed to

comply with governmental regulations and bureau policies. For motor vehicle operators, driving records are generally not verified upon assignment. The organization has policies requiring mandatory use of seat belts and restricting the use of cellular phones and texting devices but there is no consistent enforcement. Employees often do not wear PPE when operating specialized vehicles as called for by safety policies and procedures. There are policies for conducting inspections and preventive maintenance but these policies are frequently not followed. There is a system for identifying, reporting, and correcting deficiencies in vehicles or equipment such as broken parts, missing safety equipment, etc., but the system breaks down frequently resulting in delays or other problems. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* There is little, if any, formal program in place for ensuring that vehicles and motorized equipment are operated and maintained in a safe and compliant manner. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 6. Program Implementation and Operations
Assessed Element: (v) Motor Vehicles and Motorized Equipment
OHS Section Goal: Ensure Motor Vehicles and Motorized Equipment is operated safely
Recommended Performance Metric(s): Reduce motor vehicle accidents
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, DM Chapter 16
Interviewees: Managers, Supervisors, OHS staff and employees **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Does the Bureau require the employee to possess a valid State driver's license for the class vehicle to be operated? _____ 2. Are employee driver records verified at least annually? _____ 3. Do personnel operating specializes vehicles (i.e. forklifts, drill rigs, 4x4 vehicles, all-terrain vehicles (ATVs), snowmobiles, vehicles with greater than 1-ton capacity, or towing vehicles) have the skills, knowledge, and obtain supervisory authorization for vehicle use? _____ 4. Does the Bureau have a policy requiring mandatory use of seat belts, and is the policy enforced? _____ 5. Do employees wear appropriate PPE when operating specialized vehicles? _____ 6. Does the Bureau have policy regarding the use of cellular phones while the vehicle is in motion? _____ 7. Do all employees who operate a motor vehicle receive defensive driving training? _____ 8. Is there a Bureau policy for vehicle safety inspections, and are the inspections documented? _____ 9. Is there a Bureau policy for motor vehicle accident kit contained within the vehicle? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

(vi) Contractor Safety

An effective OHS program should ensure that all contractors follow appropriate worksite safety and occupational health policies, whether regularly involved in site operations or engaged in projects such as temporary construction or repair. Like other employees, contractor employees need to be informed of the nature and location of workplace hazards that their workforce stays safe and so that their activities do not create hazards for regular employees, the public, or any others. Bureau/office officials should ensure that contractors receive site orientations and training as appropriate for them to understand OHS policies and procedures particularly relating to any shared facilities, operations, or systems.

Provisions and requirements fostering an informed and collaborative working relationship with respect to OHS in the workplace should be clearly and comprehensively laid out in the executed contracting agreements. These contracts should (1) specify the authority and mechanisms for the oversight, coordination, and enforcement of safety and occupational health programs by the contractor; (2) provide for the prompt correction and control of hazards by the contractor in the event that their employees or sub-contractors fail to immediately correct or control such hazards; and (3) specify penalties, including dismissal from the worksite, for willful or repeated noncompliance by sub-contractors or individuals. All contractors should be able to demonstrate that they have considered the health and safety of all sub-contractors during the evaluation and selection process.

(1) <u>Document and Records Review</u>:

(a) OHS-related provisions of agreements currently in place with key contractors.
(b) Contractor OHS policies and procedures.
(c) Contractor Days Away and Restriction Transfers (DART) Rates.
(d) Selected contractor assessments, and evaluations.
(e) Contractor performance evaluation documentation.
(f) Safe Operating Procedures such as lock-out/tagout programs associated with facilities operated by multiple employers.
(g) Contractor-related injury/illness data, accident records, investigation reports.

(2) <u>Potential Interviewees</u>:

(a) *Contracting Officers* can address contractual provisions dealing with OHS-related matters.
(b) *Managers* should be able to discuss to what extent contractor employees are integrated into the OHS program covering their civil service employees.
(c) *Supervisors* should be able to share how contract employees work within the health and safety program and what training and accountability gaps might exist.
(d) *OHS staff* can discuss the specific operations and facilities in the workplace presenting the greatest potential hazard to contractors and the OHS policies and procedures most important to ensuring a safe workplace for contractors and DOI employees alike.

(e) *Contracting Officer Technical Representatives (COTRs) and Awarding Officials* can talk to the specifics of the safety and health requirements in the contract, how well contractors adhere to these requirements and how contractor compliance with OHS-related provisions is evaluated.

(3) <u>Potential Interview Questions</u>:

(a) How is a contractor's past safety and health performance considered in the procurement process? How does current performance relate to decisions on contract extensions, future work, etc.?
(b) What requirements do contractors have to develop and furnish a site specific safety and health plan?
(c) How are safety plans/activities coordinated among the host facility and contractors?
(d) Particularly where a General Contractor is involved on an OSHA-defined "multi-employer worksite", can you differentiate the employer whose employees are exposed to hazards ("exposing" employer)? Employer who creates the hazard ("creating" employer)? Employer who is responsible for ascertaining safety and health conditions at a site ("controlling" employer)? Employer who has the responsibility for correcting the hazard ("correcting" employer)?
(e) Who is responsible for monitoring contractor performance as regards OHS issues?
(f) What health and safety training have Contracting Officers (COs), Contracting Officer's Representatives (CORs) and COTRs received?
(g) Who has 'stop work' authority to immediately stop contractor practices that may expose Bureau/office employees to hazards?
(h) What information regarding existing hazards at the worksite does management provide contractors?
(i) How are OHS-related provisions incorporated into service contracts?
(j) As a contractor employee working in a DOI-controlled space, how would you evaluate the OHS orientation training you received?
(k) As a DOI employee working in a contractor-controlled space, how would you evaluate the OHS orientation training you received?
(l) Provide examples of where contractor OHS performance has lead to unsafe acts or conditions?

(4) <u>Observations</u>:

(a) Contractor workplaces appear free of recognized hazards.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

29 CFR 1960 - Basic Program Elements for Federal Employees OSHA

Department of Interior Departmental Manual - Chapter 24 Contractor Safety

Department of Interior Departmental Manual - Chapter 25 Concessionaire Safety

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* OHS qualifications and track record are a key consideration when hiring a contractor. Contractual agreements effectively incorporate OHS requirements and address oversight, coordination, and enforcement. All contractor organizations and contractor employees have received appropriate and effective site orientation/training and are familiar with the organization's OHS policies, procedures, and programs. All contractors fully comply with the OHS policies to which they are subject. Complete and accurate records of contractor injury and illness occurrences are maintained and compared to hours worked for consideration in light of Department of Labor Standard Industrial Classification (SIC) code statistics. Overall, a very effective means has been established for ensuring contractors perform their work in a manner which is protective of all those in the workplace. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* OHS qualifications and track record are considered when hiring a contractor. Contractual agreements effectively incorporate OHS requirements and address oversight, coordination, and enforcement. Contractor organizations and contractor employees have received appropriate and effective site orientation/training and are familiar with the organization's OHS policies, procedures, and programs. Contractors comply with the OHS policies to which they are subject. Overall, an effective means has been established for ensuring contractors perform their work in a manner which is protective of all those in the workplace. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* OHS qualifications and track record are usually considered when hiring certain types of contractors (e.g., heavy construction). Contractual agreements incorporate OHS requirements and address oversight, coordination, and enforcement in a general way. Most contractor organizations and contractor employees have received some sort of site orientation/training and are generally familiar with the organization's OHS policies, procedures, and programs. Contractors comply with most OHS policies to which they are subject. Overall, a mostly effective means has been established for ensuring contractors perform their work in a manner which is protective of all those in the workplace. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* OHS qualifications and track record are seldom considered when hiring contractors. Contractual agreements incorporate few OHS requirements and do not address oversight, coordination, and enforcement in a very effective way. Contractor organizations and contractor employees have received some site orientation/training but are not very familiar with the organization's OHS policies, procedures, and programs. Contractors have been found to not be complying with OHS policies to which they are subject and some mishaps or hazards have resulted. Overall, contractors lack OHS oversight and perform their work in a manner which sometimes results in workplace hazards. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* The OHS program has no effective means of ensuring contractors perform their work in a manner which is protective of all those in the workplace *If the evaluation of this element indicates this is the case, rate this element as a 1*.

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 6. Program Implementation and Operations

Assessed Element: (vi) Contractor Safety

OHS Section Goal(s): Contractors and their employees are held responsible for complying with OSHA and other applicable safety policies and regulations.

Recommended Performance Metric(s): Evidence of safety requirements and oversight in contracting documents and processes.

OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, , Chapter 24 Contractor Safety**,** Chapter 25 Concessionaire Safety

Interviewees: Selected Contracting Officers, Managers, Supervisors, OHS staff, COTRs and Awarding Officials

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Safe Operating Procedures -Contractor OHS programs -Contractor DART Rates
-Selected contractor assessments, and evaluations -Selected contract reviews -Correspondence with customers and other contractors
-Contractor work related injury/illness data, accident records-Relevant incident investigation reports

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Contractor work places

Processes/Evaluation Criteria: (Rank 1-5)

1. Is safety and health performance considered in the procurement process? _____
2. Is the contractor required to develop and furnish a site specific safety and health plan? _____
3. Are host and contractor safety plan/activities coordinated? _____
4. Does the Bureau have a policy to require contractors to conform to OSHA regulations and other legal requirements? _____
5. Are contractor safety performance and practices monitored by the COTR? _____
6. Have COs, CORs and COTRs received appropriate safety and health training? _____
7. Does the COTR, through the CO, have authority to stop contractor practices that expose bureau or contractor employees to hazards? _____
8. Does management provide contractors information regarding existing hazards at the site/workplace? _____
9. Is safety and health considered with service contracts? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

(vii) Procurement and Design Review

Anticipation of potential hazards even before they are present in the workplace is an important component of an effective OHS program. This entails the up-front review of procurements and designs that may result in new hazards and/or require special or additional controls to be put in place. Organizational policies should reflect the means whereby competent professionals are involved in, for example, the assessment of new chemical products or mechanical equipment being introduced into the workplace or the design of new work processes or facilities.

Effective identification of potential hazards through up-front procurement and design reviews generally requires collaboration between multiple organizations and management levels. Personnel from contracting, engineering and safety offices often form the nucleus of the review team, but others such as those in the facilities maintenance, training, medical, or security/emergency response departments may also need to be involved depending on the scope and complexity of the review. Overall, it is a goal of the OHS program to ensure that appropriate scrutiny is brought to the procurement and design processes so that hazards are not introduced unknowingly into the workplace or without the opportunity to institute appropriate hazard controls.

(1) <u>Document and Records Review</u>:

(a) Records from planning/design review committees involved in decisions about constructing new facilities or launching new work processes.
(b) Records from safety committee meetings reflecting up-front participation in procurement/design reviews.
(c) Contractor/supplier feasibility studies, assessments and evaluations.
(d) Technical reviews, feasibility studies, and impact analyses relating to products, equipment, and supplies being introduced into the workplace.
(e) Facility work orders that might provide insight to new equipment/facilities/chemical products/processes, etc.
(f) Job hazard analysis and training records (particularly for new/recent jobs).
(g) Procurement records (purchase orders, contracts for equipment, facility construction/renovation, etc.).
(h) MSDSs for new/recently procured chemical materials.

(2) <u>Potential Interviewees</u>:

(a) *Selected contracting/procurement officers* can address the specifics of the safety and health provisions in contracts and how supplies, goods, and equipment are reviewed for potential risks to the workplace prior to procurement.
(b) *Managers* should be able to discuss how they enlist the support of appropriate resources to help them make decisions about the feasibility and impact of new operations, materials, and facilities.

(c) *Supervisors* should be able to indicate whether procurements and or plans/designs had ever been improperly 'thought through' thus adversely impacting their operations and possibly putting their workers at risk
(d) *OHS staff* can discuss whether/how their expertise is utilized in support of procurements and design processes.
(e) *Contracting Officer Technical Representatives (COTRs) and awarding officials* can discuss how supplies, goods, services, and equipment are reviewed for potential risks prior to procurement and how contractors and vendors are held accountable for maintaining a safe workplace.
(f) *Facilities department* can speak to their involvement in evaluating new/modified equipment, materials, and facilities.
(g) *Engineering department* can discuss how safety and health factors are integrated into process and equipment design.
(h) *Safety committee officials* can discuss their involvement in the procurement/design process.

(3) <u>Interview Questions</u>:

(a) Are potentially hazardous materials, supplies, or equipment identified prior to introduction into the workplace? If so, what process is used? Who is responsible?
(b) Can you provide examples of when an up-front design or procurement review resulted in identification of potential hazards? How were these potential hazards addressed?
(c) Does the organization have established criteria for deciding which procurements/designs warrant upfront scrutiny to identify and anticipate possible hazards?
(d) What sorts of assessments are done to evaluate the impact of new procurements/designs/processes on the organization's compliance with environmental, safety, and health regulations? Can you provide examples of when these assessments led to new safety training requirements, additional engineering/administrative/PPE hazards controls, filing of new MSDSs, etc.

(4) <u>Observations</u>:

(a) Newly installed equipment and facilities appear to be functioning properly and without missing or inadequate safety controls.
(b) Employees appear to be well versed in handling new supplies, operating new equipment, and using new facilities.

(5) <u>References</u>:

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual - Chapter 24 Contractor Safety

Department of Interior Departmental Manual - Chapter 25 Concessionaire Safety

29 CFR 1960.25(a) Executive Order 12196 requires that each agency utilize as inspectors "personnel with equipment and competence to recognize hazards." Inspections shall be conducted by inspectors qualified to recognize and evaluate hazards of the working environment and to suggest general abatement procedures. Safety and health specialists as defined in 1960.2(s), with experience and/or up-to-date training in occupational safety and health hazard recognition and evaluation are considered as meeting the qualifications of safety and health inspectors. For those working environments where there are less complex hazards, such safety and health specializations as cited above may not be required, but inspectors in such environments shall have sufficient documented training and/or experience in the safety and health hazards of the workplace involved to recognize and evaluate those particular hazards and to suggest general abatement procedures. All inspection personnel must be provided the equipment necessary to conduct a thorough inspection of the workplace involved.

Public Law 91-596; Section 19(2) Acquire, maintain, and require the use of safety equipment, personal protective equipment, and devices reasonably necessary to protect employees.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding*. There are written policies and procedures which identify when and how design and procurement reviews are to be performed, who is responsible, and how safety and occupational health concerns are addressed upfront. All evidence indicates that the design and procurement review polices are working effectively and that the safety and health ramifications of introducing new or modified equipment, materials, processes, or facilities are anticipated and that appropriate protective controls are instituted at the proper time. Appropriate resources are available and routinely brought to bear for the review processes tailored to the specific nature of the design/procurement. The design/procurement review process can be counted on to ensure that hazards are not introduced unknowingly into the workplace or without the opportunity to institute appropriate hazard controls. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Policies and procedures identify when and how design and procurement reviews are to be performed, who is responsible, and how safety and health concerns are addressed upfront. Design and procurement review polices are working effectively and the safety and occupational health ramifications of introducing new or modified equipment, materials, processes, or facilities are anticipated and appropriate protective controls are instituted in a timely fashion. Appropriate resources tailored to the specific nature of the design/procurement are available for the review processes. The design/procurement review process ensures that hazards are not introduced unknowingly into the workplace or without the opportunity to institute appropriate hazard controls. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Policies and procedures generally identify when and how design and procurement reviews are to be performed, who is responsible, and how safety and occupational health concerns are addressed upfront. Design and procurement review polices are mostly effective and the safety and occupational health ramifications of introducing new or modified equipment, materials,

processes, or facilities are usually anticipated so that appropriate protective controls are instituted in a timely fashion. Reviewers have adequate technical skills and familiarity with the organization so as to perform a good assessment of the design/procurement in question. The design/procurement review process fairly well ensures that hazards are not introduced unknowingly into the workplace or without the opportunity to institute appropriate hazard controls. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* There is a basic understanding of the need to identify potential hazards upfront during design/procurement, but specific policies/procedures defining how this is to be done are not present or largely incomplete. Design and procurement review polices are not consistently effective at anticipating the safety and occupational health ramifications of introducing new or modified equipment, materials, processes, or facilities. Reviewers may not have adequate technical skills and familiarity with the organization to perform a good assessment of the design/procurement in question. The design/procurement review process cannot be relied upon to keep hazards from being introduced unknowingly into the workplace. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* There is no effective upfront mechanism to identify or anticipate potential hazards stemming from design or procurement processes. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 6. Program Implementation and Operations
Assessed Element: (vii) Procurement and Design Reviews
OHS Section Goal: Establish requirements for the review of supplies, goods and equipment for potential risk exposure prior to procurement.
Recommended Performance Metric(s): Organization examines and evaluates safety and information supplies, goods and equipment prior to purchase.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 24 Contractor Safety**,** Chapter 25 Concessionaire Safety
Interviewees: Selected Contracting Officers, Managers, Supervisors, OHS staff, COTRs and Awarding Officials **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -Safe Operating Procedures -Contractor OHS programs -Contractor DART Rates -Selected contractor assessments/evals. -Correspondence w/customers, other contractors -Contractor work related injury/illness data, accident records -Relevant incident investigation reports -Selected contract reviews **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Selected purchased Products -Selected staffing contracts -Selected service contracts
Processes/Evaluation Criteria: (Rank 1-5) 1. Does the Bureau use Material Safety Data Sheets (MSDS) when purchasing hazardous materials? _____ 2. Does the Bureau review new or modified equipment, facilities or processes for safety and health hazards prior to exposing employees to their operation? ____ 3. Are procured products listed or labeled by a National Testing Laboratory? _____ 4. Are written standards developed to help guide the procurement office (485 DM)? _____ 5. Is there involvement of the safety, health and accessibility functions in new facility design documents reviews and renovations, modifications or occupancy changes in existing facilities? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Handbook to Guide Completion of the Safety and Occupational Health Program Evaluation Tool

Component 6: Program Implementation and Operation

(viii) Specialized Programs and High Hazard Operations

Specialized programs/high hazard operations often require additional or unique policies and procedures in order to maintain a safe and healthful workplace. Examples of specialized programs/high hazard operations in the DOI include, but are not limited to operation of watercraft and airplanes, SCUBA diving, use of firearms and explosives, etc.

Standard OHS policies and procedures may not be effective in dealing with hazards associated with specialized programs due to issues such as sporadic or infrequent conduct of the special activities, lack of familiarity with OSH requirements by personnel focused on special programs, or, conversely, lack of familiarity of special programs by management and members of the OHS staff. Similarly, with high hazard operations, the consequences of ineffective OHS policies and procedures can be disastrous. For both specialized programs and high hazard operations, a special emphasis must be made to ensure that policies and procedures are sufficient to recognize, evaluate, and control workplace hazards and that they are implemented in a failsafe manner.

(1) <u>Document and Records Review</u>:

(a) Position descriptions, organizational charts, and personnel training matrices which identify may identify special programs or high hazard operations.
(b) Records of hazardous duty pay.
(c) OSHA 300 logs, CA-2 forms, etc.
(d) Records of specialized certifications, permits, or qualifications required for certain high hazard jobs.
(e) Documentation of PPE assessments.
(f) Job Hazard Analyses (JHAs) records (especially those assigning Risk Assessment Codes to characterize frequency/severity of potential hazards).
(g) Policies, procedures, operating/instruction manuals, etc., associated with high hazard operations.

(2) <u>Potential Interviewees</u>:

(a) *Managers, supervisors, and OSH staff* should be able to identify any specialized programs/high hazard operations in the organization which may fall outside the norm in terms of applicability of standard OHS policies and procedures.
(b) *Members of the Safety Committee and OHS staff* should be able to discuss the nature of any special policies and procedures brought to bear on specialized programs/high hazard operations.
(c) *Employees* should be able to discuss how effective existing policies and procedures are in controlling hazards associated with specialized programs/high hazard operations (especially dealing with training and PPE/engineering controls).

(3) <u>Interview Questions</u>:

(a) *Managers*: Are employees of this organization involved in high hazard activities or operations such as SCUBA diving, use firearms/explosives, aviation, high incline activities, others?

(b) *Management and OHS staff*: Within your organization, what specialized certifications, permits, or qualifications are required to perform high hazard operations?

(c) *Supervisors*: What oversight is provided of high hazard operations to ensure OHS policies and procedures are being effectively implemented? How are the tools, equipment, facilities maintained so that they are reliable for use during high hazard activities?

(d) *Employees*: Are you involved in any specialized programs/high hazard operations which require additional, unusual, or special OHS-related policies and procedures?

(4) <u>Observations</u>:

(a) There is evidence that special programs/high hazard operations are carried out by qualified, competent persons having all appropriate training, credentials and in accordance with sound policies and procedures that are monitored and enforced.

(5) <u>References</u>:

OSHA 3071 - This booklet is for employers, foremen, and supervisors, employees are encouraged to use the information as well to analyze their own jobs and recognize workplace hazards so they can be reported. It explains what a job hazard analysis is and offers guidelines on conducting a step-by-step analysis.

OSH Act of 1970 - To assure safe and healthful working conditions for working men and women.

Executive Order 12196 - The head of each agency shall operate an occupational safety and health program in accordance with the requirements of this order and basic program elements promulgated by the Secretary.

OSHA Instruction FAP 2.1B June 19, 1989 - Evaluation of Federal Agency Occupational Safety and Health Programs

Department of Interior Departmental Manual - Chapter 15 Aviation Safety

Department of Interior Departmental Manual - Chapter 21 Radiation Safety

Department of Interior Departmental Manual – Chapter 22 Watercraft Safety

Department of Interior Departmental Manual - Chapter 27 Underwater Diving Safety

29 CFR 1960.16 Each agency head shall comply with all occupational safety and health standards issued under section 6 of the Act, or with alternate standards issued pursuant to this subpart. In complying with section 6 standards, an agency may, upon prior notification to the Secretary, prescribe and enforce more stringent permissible exposure levels or threshold limit values and may require more frequent monitoring of exposures without recourse to the approval procedures for alternate standards described in 1960.17. In addition, after consultation with employees and safety and health committees and prior notification to the Secretary, an agency may utilize the latest

edition of a reference standard if it is more stringent than the section 6 standard. After notification, the Secretary may require the use of the approval procedures for alternate standards for any of the situations described in this paragraph.

29 CFR 1910.119(d) Process safety information. In accordance with the schedule set forth in paragraph (e)(1) of this section, the employer shall complete a compilation of written process safety information before conducting any process hazard analysis required by the standard. The compilation of written process safety information is to enable the employer and the employees involved in operating the process to identify and understand the hazards posed by those processes involving highly hazardous chemicals. This process safety information shall include information pertaining to the hazards of the highly hazardous chemicals used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process.

29 CFR 1910.119(e)(1) The employer shall perform an initial process hazard analysis (hazard evaluation) on processes covered by this standard. The process hazard analysis shall be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process. Employers shall determine and document the priority order for conducting process hazard analyses based on a rationale which includes such considerations as extent of the process hazards, number of potentially affected employees, age of the process, and operating history of the process.

(6) <u>Rating Criteria for this Element:</u>

(a) *Outstanding.* Specialized programs/high hazard operations are afforded additional OHS scrutiny and controls to maintain a safe and healthful workplace. As necessary, additional or unique policies and procedures have been put in place and are effectively monitored to ensure consistent compliance. Job Hazard analysis (JHA) and safe work practices for each high hazard job are documented. Specialized programs/high hazard operations have been integrated into established emergency preparedness procedures and contingencies. All employees involved in high hazard occupations are trained in safe work procedures and properly credentialed (where such credentials exist). Failsafe mechanisms have been put in place to ensure tools, equipment, and facilities are safe for high hazard operations. *If the evaluation of this element indicates this is the case, rate this element as a 5.*

(b) *Exceeds.* Specialized programs/high hazard operations are afforded additional OHS scrutiny and controls to maintain a safe and healthful workplace. Some additional or unique policies and procedures have been put in place and are monitored to ensure consistent compliance. Safe work practices for virtually all high hazard jobs are documented. Specialized programs/high hazard operations have been well integrated into established emergency preparedness procedures and contingencies. Employees involved in high hazard occupations are trained in safe work procedures and properly trained and credentialed (where such credentials exist). Good mechanisms have been put in place to ensure tools, equipment, and facilities are safe for high hazard operations. *If the evaluation of this element indicates this is the case, rate this element as a 4.*

(c) *Met.* Specialized programs/high hazard operations are afforded some additional OHS scrutiny and controls to maintain a safe and healthful workplace. Some additional or unique policies

and procedures have been put in place and general oversight mechanisms exist. Safe work practices for most (but not all) high hazard jobs are documented in some fashion. Specialized programs/high hazard operations have been mostly integrated into established emergency preparedness procedures and contingencies. Employees involved in high hazard occupations are generally trained in safe work procedures and properly credentialed (where such credentials exist). Some mechanisms have been put in place to ensure tools, equipment, and facilities are safe for high hazard operations. *If the evaluation of this element indicates this is the case, rate this element as a 3.*

(d) *Partially Met.* Specialized programs/high hazard operations are afforded limited additional OHS scrutiny and controls. Special policies and procedures have not been put in place although they are needed and would serve to make the workplace safer. Few oversight mechanisms exist to ensure consistent, effective implementation. Documentation of safe work practices is lacking for some high hazard jobs. Specialized programs/high hazard operations have not been effectively integrated into established emergency preparedness procedures and contingencies. Employees involved in high hazard occupations are not always trained in safe work procedures and proper credentials are sometimes lacking. Few mechanisms have been put in place to ensure tools, equipment, and facilities are safe for high hazard operations. *If the evaluation of this element indicates this is the case, rate this element as a 2.*

(e) *Not Present.* Specialized programs/high hazard operations are not afforded little in the way of additional OHS scrutiny and controls to maintain and policies and procedures are lacking or non-existent. *If the evaluation of this element indicates this is the case, rate this element as a 1.*

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: 6. Program Implementation and Operation

Assessed Element: (viii) Specialized Programs/High Hazard Activities

OHS Section Goal(s): Policies are developed and networking is established that integrates safety processes into all high hazard and specialized safety program activities

Recommended Performance Metric(s): Written programs for the specialized programs have been developed and implemented.

OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, DM Chapter 15 Aviation Safety, Chapter 22 Watercraft Safety, Chapter 27 Underwater Diving Safety, 353 DM 1.2

Interviewees: Managers, Supervisors, OHS staff and employees
Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness
Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

Processes/Evaluation Criteria: (Rank 1-5)
WATERCRAFT (DM Chapter 22):
1. Does the Bureau have a watercraft program? _____
2. Are periodic evaluations conducted? _____
3. Does the Bureau require float plans? _____
4. Are Job Hazard Analysis conducted? _____
5. Are operators of watercraft are adequately trained, properly tested and certified? _____
6. Are all persons required to wear a U.S. Coast Guard-approved personal flotation device (PFD)? _____
7. Do all employees who operate or work in watercraft maintain certification in American Red Cross Standard First Aid, or equivalent, and CPR?_____

AVIATION (DM Chapter 15):
1. Are all aircraft services procured through the National Business Center, Division of Aviation Management (DAM)? _____
2. Are supervisors and employees in aviation management provided aviation user safety training? _____
3. Have all persons who fly missions or supervise aviation activities under operational control of the bureau received the required aviation user safety training?
4. Prior to each contract flight, do personnel visually inspect the pilot qualification and aircraft data cards for current authorization by DAM? _____
5. Are all aircraft accidents or incidents that don't warrant investigation by NTSB investigated using the SAIT process? _____

UNDERWATER DIVING (DM Chapter 27):
1. Does the Bureau have a underwater diving program? _____
2. Does the Bureau have a diving safe practices manual? _____
3. Are all employees who perform underwater diving activities adequately trained and physically qualified? _____
4. Is a Dive Plan and Dive Hazard Analysis conducted for each dive? _____
5. Do divers receive First Aid, CPR and oxygen first aid? _____
6. Are records maintained as mandated? _____

FIREARMS (DM Proposed Chapter):

OHS Section Ranking ____
5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

Safety and Occupational Health Program Evaluation Tool

_____

BUREAU

_____

COMPONENT/OPERATION

_____

ESTABLISHMENT/INSTALLATION

_____

EVALUATOR(S)

_____

DATE

March 2010 Edition

Instruction to Users:

For Occupational Health and Safety (OHS) Program Evaluations to be successful, the scope of the evaluation, information collected, and processes reviewed need to be established. This is essential information for the reviewers and those being reviewed. This evaluation tool identifies the sequencing, scope, and information that must be gathered for a successful program review and evaluation. It is important, as part of the evaluation process, to collect objective evidence that demonstrates conformance with OHS policy and applicable standards and regulations.

This Tool consists of OHS program elements listed as review sections with corresponding types of objective evidence that should be used in conducting the OHS program evaluation. The degree of detail shown within each section may not be needed for every bureau or office, but the section (i.e., element) should be part of any organization's OHS program.

Tips on how to read the attached evaluation review:

1. OHS Component: These are applicable OHS program elements that are in the scope of this review.

2. Assessed Element: Subcategory of the OHS Component.

3. OHS Section Goal: Outline of achievements that indicate success in meeting the elements of the goal.

4. Recommended Performance Metrics: Leading indicators of a safety and occupational health programs success.

5. Interviewees: This includes management and other employees with OHS duties and responsibilities, and employees from various levels of the bureau's general population, who are all involved in some aspect of the OHS program.

6. Documents: Documented processes that a bureau has implemented in furthering its OHS program.

7. Records: Specific records such as SMIS, SHARE goal rates, etc., that can be used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

8. Observations: Usually workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

9. Processes/Evaluation Criteria: Criteria that summarize the section and describe an effective OHS program element for each category.

10. OHS Section Ranking: A numerical status of the bureau's program in each category from 1 (poor) to 5 (excellent).

The Evaluation Tool is designed to help determine the bureau or office's compliance with laws, regulations, DOI policy, and other applicable standards. The tool leads evaluation team members through two basic steps:

1. The inquiry process by providing formal questions and assisting with informal and follow-up questions.

2. The collection and examination of physical evidence to support evaluation determinations.

Once information has been collected about the bureau/office safety and health program, the findings must be evaluated. The information must be reviewed in terms of the program goals to determine both whether program objectives are being met and to present significance of audit findings. Although evaluators usually make preliminary evaluations of their observations throughout the audit, the team should devote time at the end of the evaluation to jointly discuss, evaluate, analyze, and jointly finalize the evaluation findings.

SAFETY AND OCCUPATIONAL HEALTH PROGRAM EVALUATION CRITERIA

OHS Component: **a. Leadership and Management**

Assessed Element: (i) Commitment, Involvement and Communication

OHS Section Goal(s): Leadership and management demonstrate visible support, commitment and provide a motivating force for an effective safety and health program. Leadership and management communicate safety and health values throughout the Bureau.

Recommended Performance Metric(s): Safety topics at senior management meetings. Current safety and health policy. Effective communication tools.

Interviewees: DASHO, mid and higher level managers, Supervisors, Employees and Personnel assigned to implement and maintain OHS program.
Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness, manager performance elements.
Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-SMIS Injury/Illness records/analysis -OHS policy documents -SHARE goal documents -Safety and health performance elements
-OHS awards programs -SHARE records -Workers' comp. cost information and return-to-work programs
-Senior managers/safety committee members training and education records -"Tool Box" safety briefings minutes
-VPP applications - Records promoting the OHS program

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Does management participate in the program? _____
2. Are safety and health issues regularly included on agendas of management and operational meetings? _____
3. Does management follow all safety and health rules? _____
4. Do leaders and managers give visible support to the safety and health efforts of others? _____
5. Does management participate in significant aspects of the safety and health program, such as site inspections, accidents, program reviews? _____
6. Is safety and health a performance standard for managers and supervisors? _____
7. Are managers and supervisors held accountable for the safety and occupational health of their employees? _____ How?
8. Has management established and communicated safety and health goals/objectives? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: **a. Leadership and Management**

Assessed Element: (ii) Responsibility and Accountability

OHS Section Goal: Top management shall provide leadership and assume overall responsibilities for: (a) Implementing, maintaining, and monitoring performance of the OHSMS; (b) Providing appropriate financial, human, and organizational resources to plan, implement, operate, check, correct, and review the OHSMS; (c) Defining roles, assigning responsibilities, establishing accountability, and delegating authority to implement an effective OHSMS for continual improvement; and (d) Integrating the OHSMS into the organization's other business systems and processes. Employees shall assume responsibility for aspects of health and safety over which they have control, including adherence to the organization's health and safety rules and requirements.

Recommended Performance Metric(s): Written policies are in place and implemented

Interviewees: Managers, Supervisors, Employees and OHS staff

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance.

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Documents designating various positions with S&H duties and responsibilities
-Organization chart, budgets, and job descriptions
-OHS excerpts from executive meeting minutes,
-Meetings
-OHS program/ manual
-Qualifications for OHS staff
-Manager, Supervisor, OHS staff and Committee training records
-OHS committee meetings minutes
-Verification of S&H authority at appropriate levels

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Has the Secretary/Director appointed a Designated Agency Safety and Health Official (DASHO) with sufficient authority and responsibility to represent the Bureau interest and support of the agency's occupational safety and health program? _____
2. Do Bureau/offices safety and health headquarters staff report directly to, or have appropriate access to, the Designated Agency Safety and Health Official, in order to carry out the responsibilities under this part? _____
3. Does the Bureau provide adequate budgets and staffs to implement the occupational safety and health program at all operational levels? _____
4. Are managers and supervisors delegated at each appropriate level with sufficient authority and responsibility to plan for and assure funds for necessary safety and health staff, equipment, materials, and training required to ensure an effective occupational safety and health program? _____
5. Does bureau management assign overall responsibility for implementing site safety and health programs to line managers? _____
6. Do line managers have authority to direct abatement of hazards that can be corrected without major capital expenditure?
7. Do management representatives have some expertise in hazard recognition and applicable OSHA requirements? _____
8. Does the organizational structure facilitate open communication across their organization and especially between managers and safety staffs in the field and at their national office? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: **a. Leadership and Management**
Assessed Element: (iii) Financial Resources
OHS Section Goal(s): Employee safety and health is adequately resourced.
Recommended Performance Metric(s): Safety and health input in Budget formulation; Adequacy of Resources to implement and administer the Program
Interviewees: Managers, Supervisors, Employees and OHS staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed; -Budget and Expense Reports; Green Book Submittals; Abatement Costs
Processes/Evaluation Criteria: (Rank 1-5) 1. Does the Secretary/Director ensure that the agency budget submission includes appropriate funds for effective implement and administer the agency's occupational safety and health program? _____ 2. Does the final budget actually reflect program requirements? _____ 3. Do line managers have authority to order/purchase safety and health equipment? _____ 4. Are safety offices provided the resources goods and services (i.e., Safety and health sampling, testing, and diagnostic and analytical tools and equipment, including laboratory analyses, etc.) _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: a. Leadership and Management
Assessed Element: (iv) Personnel Resources (Size and Technical Skill of Staff)
OHS Section Goal: Staffing is sufficient for mission
Recommended Associated Performance Metric(s): Personnel ratios per numbers of employees, professional staff credentialing
Interviewees: Managers, Supervisors, Employees and OHS staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe-efficient/unsafe-inefficient activities are witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Is professional staff credentialed? _____ 2. Are Collateral Duty Safety Officers (CDSO) adequately trained in a timely manner? _____ 3. Is there succession planning in the safety program? _____ 4. Sufficient personnel to implement and administer the program at all levels? _____ 5. Have other resources been used (FOH, NIOSH, Contractors', etc.)? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: a. Leadership and Management

Assessed Element: (v) Policy

OHS Section Goal(s): Safety and health policy establishes an overall sense of direction, sets the principles of action for the bureau and offices

Recommended Performance Metric(s): Policy is in place, current, and effectively communicated

Interviewees: Bureau managers, Supervisors, OHS staff, OHS committee members, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Written policies	- Notifications	- OSHA records as required	- OHS intranet site
- Emails, memos, articles, posters	- Audio-visual presentations	- Policy postings	- Policy (issued in last three years)
- Bulletin boards	- Posters	- Website review	-Education/training documents
-Records that demonstrate that safety and health policies have been communicated to employees			-Agency or region safety and health internet sites

Processes/Evaluation Criteria: (Rank 1-5)

1. Is the safety and health policy is current? _____
2. Is the safety and health policy comprehensive? _____
3. Does the safety and health policy address hazards identification/effective risk management practices? _____
4. Is the safety and health policy successfully communicated in terms of desired scope, detail and expected outcomes? _____
5. Does the Bureau DASHO effectively communicate policy needs to Bureau leadership? _____
6. Does the Bureau DASHO in concert with Bureau leadership carry out policy requirements? _____
7. Does the policy statement incorporate the health and well being of both employees and the public; with emphasis placed on efficient operations with a minimum of accidents and losses; and loss control is integrated into all operations? _____
8. Does the policy commit to the protection and continual improvement of employee safety and health; effective employee participation; conformance with departmental safety and health requirements, and compliance with laws and regulations? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: a. Leadership and Management
Assessed Element: (vi) Program Promotion and Recognition
OHS Section Goal: Establishment of a safety and health awards and recognition process that involves senior managers and promotes desirable performance and safe behaviors at all organizational levels
Recommended Performance Metric(s): Bureau has a performance based awards program with set criteria
Interviewees: Committee Representatives, Bureau managers, Supervisors, Employees and Union representatives **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: Rank 1-5) 1. Has the Bureau/Offices established an awards program? ____ 2. Has the Bureau/Offices established criteria for the awards program? ____ 3. Has the Bureau/Offices implemented its award program? ____ 4. Does the Bureau/Offices recognize and promote safety and health performance? ____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: b. Employee Participation

Assessed Element: (i) Safety Committees

OHS Section Goal: Employees/employee representatives are involved in the development and implementation of Program activities as demonstrated by: (a) employee participation on safety committees; (b) committee charters include, communication with organizational management; (c) involvement in hazard mitigation; (d) promote safety and health activities and (e) providing recommendation for program improvements.

Recommended Performance Metric(s): Where committees exist, functioning appropriately and contributing to the mission.

Interviewees: Committee Representatives, Bureau managers, Supervisors, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

- Bureau OHS procedures - Human resource policies - Injury reporting procedures - Union agreements
- OHS meetings - Job briefings - OHS committee meetings - Operations inspections
- Workplace records - Employee suggestions

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

- OHS committee rosters and meeting minutes - Employee notices of unsafe and unhealthful conditions - Bargaining unit records - SMIS records-Bureau or regional meetings

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Does the committee have a charter and functioning to the charter? _____
2. Are occupational safety and health committees established to monitor and assist the Bureau's safety and health program and maintain open channel of communication between employees and management concerning safety and health matters in bureau workplaces? _____
3. Are committees formed at the appropriate level? _____
4. Do committees have appropriate representation of management and non-management employees, who are members of record? _____
5. Where some employees of an establishment are covered under collective bargaining arrangements and others are not, are members representative of both groups? _____
6. Are committee members rotated periodically? _____
7. Do Committees establish a regular schedule of meetings and special meetings held as necessary? _____
8. Is adequate advance notice of committee meetings furnished, and are minutes of the meetings published? _____
9. Does the Bureau provide the resources (time, travel, training, meeting space, etc.) for the committee to function? _____
10. Does the agency or facility encourage participation of management employees in Federal Safety and Health Councils? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

<u>OHS Component</u>: b. Employee Participation
<u>Assessed Element</u>: (ii) Program Involvement
OHS Section Goal: A demonstrated process that a) advises all employees of their S&H rights; b) promotes their involvement in the safety and health program and in reporting hazards; c) prohibits, by policy and actions, supervisory or employee reprisals for hazard reporting; and d) ensures an effective means to respond to, action, and mitigate workplace hazards.
Recommended Performance Metric(s): Required attendance of new employee orientation within 90 days
Interviewees: Managers, Supervisors, Employees and OHS staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Are employees authorized official time to participate in the OSH program activities? _____ 2. Is there new employee orientation covering the Bureau's occupational safety and health program? _____ 3. Is new employee orientation provided within 90 days? _____ 4. Does new employee orientation meet OSHA and Bureau requirements? _____ 5. What are the Bureau's procedures for reporting unsafe or unhealthful working conditions, procedures for reporting anonymously by employees? _____ 6. What are the Bureau's procedures for employees reporting allegations of reprisal due to participation in safety and/or health activities? _____ 7. Is safety and health information readily available to the employees? _____ 8. Are DOI/DOL safety and health posters located in conspicuous places and available to employees? _____ 9. Have the workers right to refuse or stop work that they reasonably believe involves imminent danger communicated and understood by employees and recognized by management? _____ 10. Is open communication across their organization encouraged, especially between employees and management? _____ 11. Opportunities for employees to participate in safety and health program activities? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: **c. Hazard Recognition and Prevention**

Assessed Element: (i) Inspection, Identification and Prioritization of Deficiencies

OHS Section Goal: An effective, proactive safety and health program will seek to identify new hazards and failures in hazard controls, analyze findings, and identify feasible abatement methods. A system will be used to track results.

Recommended Performance Metric(s): Increase Safety Program Audit Compliance with no RAC 1 or 2.

Interviewees: Bureau managers, Supervisors, Employees, OSH staff, Union representatives and Law Enforcement staff

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Record-keeping logs -CA-1, CA-2 -Inspection program documents -Hazard notices
-Inspection records -Abatement records -Abatement plans -SMIS reports
-Workers' Compensation program reports -Employee reports of unsafe and unhealthful

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Corrected hazards -Overall condition of facility or worksites -OSHA posters

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Are the OSHA required inspections conducted and documented? _____
2. Does the bureau generally comply with DOI/OSHA standards? (How do deficiencies relate to the safety and health program: lack of inspections, training, funds, etc.)? _____
3. Does the bureau utilize as inspectors "personnel with equipment and competence to recognize hazards? _____
4. In addition to the annual inspections, are more frequent inspections conducted in all workplaces where there is an increased risk of accident, injury, or illness due to the nature of the work performed? _____
5. Are employee representatives provided the opportunity to participate during the inspections? _____
6. What is the process to respond to the abatement of the unsafe or unhealthful working condition? _____
7. Are corrective actions documented? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: c. Hazard Recognition and Prevention

Assessed Element: (ii) Hazard Control and Abatement

OHS Section Goal: An effective tracking system is in place that (a) identifies and assess hazards; (b) documents interim and final abatement actions and (c) promotes the use of engineering, work practice and administrative controls and personal protective equipment (PPE) as applicable to prevent and/or control workforce exposure(s) to such hazards

Recommended Performance Metric(s): Risk assessments completed; hierarchy of controls in place; prioritization of corrective actions.

Interviewees: Field staff -Facilities staff, Law Enforcement, Managers, Supervisors, OHS staff, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Job hazard analyses (JHA), follow-up, and corrective action records -Facilities work orders -Engineering project logs -Employee suggestions

-Ergonomic evaluations -Purchase orders (safety program related)

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-PPE Program-Tour facility identify PPE use

-Tour facilities to review engineering controls and warnings - Tour facilities to review administrative controls,

- Tour facilities to review hazards identified and control strategies -On site document reviews

Processes/Evaluation Criteria: **(Rank 1-5)**

1. Are employees provided place of employment, free from uncontrolled hazards? _____
2. Does the Bureau ensure the abatement of unsafe and unhealthful conditions following the DOI Risk Assessment Code? _____
3. Are sufficient unannounced inspections and unannounced follow-up inspections conducted to ensure the identification and abatement of hazardous conditions promoted? _____
4. Does the responsible manager/supervisor promptly prepare an abatement plan when the hazard cannot be corrected within 30 calendar days? _____
5. When a hazard cannot be abated within the authority and resources of the local establishment, is assistance requested from higher authority? _____
6. How effective is the Bureau's system for tracking abatement? _____
7. Are RAC 1 and 2 conditions abated immediately? _____
8. Are identified hazards coordinated with facility management for abatement? _____
9. Is a preventative maintenance schedule implemented for areas where needed and followed under normal circumstances? _____
10. Are breakdown repairs for safety related items are expedited? _____
11. Are appropriate controls (engineering, work practice and administrative controls, PPE) in place for significant hazards and continually improved upon based on workplace experience and general knowledge? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: c. Hazard Recognition and Prevention
Assessed Element: (iii) Reports of Unsafe/Unhealthful Conditions
OHS Section Goal: An effective process to report unsafe or unhealthful working conditions
Recommended Performance Metric(s): # of unsafe/unhealthful conditions reported by employees and corrected
Interviewees: Field staff, Facilities staff, Law Enforcement, Managers, Supervisors, OHS staff, Employees and Union representatives, **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -Unsafe/Unhealthful Condition Reports, follow-up, and corrective action records -Facilities work orders -Engineering project logs -Employee suggestions -Ergonomic evaluations -Purchase orders (safety program related) **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Are employees aware of their right and the Bureau process used to report unsafe and unhealthful working conditions to appropriate officials? _____ 2. Has the Bureau implemented an effective program for employees or representatives of employees to report unsafe or unhealthful working conditions? _____ 3. Are complaint inspections conducted within 24 hours for employee reports of imminent danger conditions, within three working days for potentially serious conditions, and within 20 working days for other than serious safety and health conditions, unless the hazardous condition(s) identified are abated immediately? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: **c. Hazard Recognition and Prevention**

Assessed Element: (iv) Process/Operational Hazard Analysis, Management of Change

OHS Section Goal: Job Hazard Analysis and risk assessments are conducted and updated as new processes, jobs, and tasks are begun. Recommended controls that minimize or eliminate worker exposure to the hazard(s) are implemented.

Recommended Performance Metric(s): Job Hazard Analysis and risk assessments for all recognized hazardous operations.

Interviewees: Field staff, Facilities staff, Law Enforcement, Managers, Supervisors, OHS staff, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Job Hazard Analysis (JHA), follow-up, and corrective action records
-Facilities work orders
-Engineering project logs
-Employee suggestions
-Ergonomic evaluations
-Purchase orders (safety program related)
-PPE Program

Processes/Evaluation Criteria: (Rank 1-5)

1. Are Job Hazard Analysis (JHA) or risk assessments completed for all hazardous jobs, or evaluated and considered where an injury or illness has been recorded? _____
2. Is hazard analysis integrated into design, development, implementation, and changing of all processes and work practice? _____
3. Do knowledgeable persons review all planned/changed/new facilities, processes, materials and equipment before they are procured? _____
4. Are requests for deviations/variances reviewed by safety and health officials and approved by management? _____
5. Are JHA controls continually improved based on workplace experience and general knowledge? _____
6. Does the Bureau collect and compile occupational safety and health exposure data for the proper evaluation of worksite hazards and necessary corrective action, as well as maintaining program OSH statistics? _____
7. Does the Bureau use hierarchy of controls to protect employees? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: **d. Evaluation and Analysis**

Assessed Element: (i) Program Evaluations and Assessments

OHS Section Goal: Internal safety and health program evaluations are conducted at appropriate organizational levels to assess and validate effectiveness of the bureau/office's safety and health programs, identify and address program weaknesses and ensure continuous improvement.

Recommended Performance Metric(s): Assessments scheduled and conducted. Results used for continuous program improvement.

Interviewees: Bureau managers, Supervisors, Employees, Union representatives, Safety and health staff, Workers' Compensation managers and Administrative officers

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Safe Operating Procedure(s) -Safety program evaluations, audits and updates -Injury or illness trend reports -Accident Review Boards
-SHARE goals status reports - Inspections of injury producing operations/ -Procedures for safety and health program reviews and evaluations
-Annual OSHA report -Lists of OHS issues -Job Hazard Analyses -Exposure data
-Injury/illness data analysis -Organization chart, job descriptions -Program review records -Incident investigation records
-Hazard abatement records -Inspection/Monitoring data/corrective action -OSH program compliance review
-Follow-up corrective action reports -Annual OSH report to OSHA

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Tour facilities, compare to OHS issues list, incident investigation corrective actions, OHS inspections recommendations

Processes/Evaluation Criteria:

1. Are there effective plans and procedures for evaluating the Bureau's internal occupational safety and health program? _____
2. Are the results reviewed at the DASHO level? _____
3. Do internal evaluations meet regulatory requirements? _____
4. Does the evaluation team provide feedback on performance? _____
5. Has the Bureau performed a baseline evaluation and is this baseline used for continuous improvement? _____
6. Are program review teams properly trained to conduct program evaluations? _____
7. Has the Bureau developed performance measures or indicators and are they used in evaluations to identify opportunities for program improvement? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: **d. Evaluation and Analysis**

Assessed Element: (ii) Accident Analysis and Prevention

OHS Section Goal: Assess injury and illness records to establish and implement a process to prioritize the OHS issues.

Recommended Performance Metric(s): Accident data is analyzed and communicated for prevention purposes.

Interviewees: Selected monitoring task owners, Managers, Supervisors, Employees, Union representatives and OHS staff

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-OHS program monitoring documents
-Medical program documents
-Assessments
-Management decision documents
-List of parameters to monitor (e.g., SHARE)
-Selected monitoring data (e.g., inj./ill. rates)
-Related action plans, goals, objectives
-OHS issues list
-SMIS reports
-Employee reports of unsafe/unhealthful conditions
-JHA
-Medical program records

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Monitoring system(s) work products/ data reports
-OHS issues list
-Management of corrective actions or rewards

Processes/Evaluation Criteria: (Rank 1-5)

1. Does the Bureau have recording and reporting requirements that are in compliance with 29 CFR Part 1904 for determining which injuries and illnesses are entered into the records and how they are entered, and provide injury and illness information required by 29 CFR Part 1904? _____
2. Is the OSHA 300 Log maintained and is the OSHA 300A posted as required? _____
3. Does the Bureau, region and local organization review injury/illness statistics and provide analysis and feedback to respective management? _____
4. Are injury/illness reports compared to OWCP claims to identify trends and sources of injuries? _____
5. Are supervisors conducting accident investigations? _____
6. Do managers use the accident data provided to them to identify high risks jobs and implement prevention measures? _____
7. Are exposure records and analysis maintained and available to safety personnel? _____
8. Are injuries and illnesses audited by safety personnel and verified as accurate and complete? _____
9. Is injury/illness data fully analyzed to identify underlying causes and other contributing factors? _____
10. Are all levels of management and the workforce aware of results of data analysis and resulting preventive activity? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: **d. Evaluation and Analysis**
Assessed Element: **(iii) Data Analysis, Performance Metrics, Management Review/Follow-up**
OHS Section Goal: The effective safety and health program has set objectives and developed quantified performance indicators based on issues that offer the greatest opportunity for program improvement and risk reduction.
Recommended Performance Metric(s): Evidence of an annual safety program action plan with measurable objectives, quantifiable performance indicators, reports to managers and employees on accomplishment of objectives, and revised objectives when appropriate.
Interviewees: Bureau managers, Supervisors, OHS staff, Employees and Union representatives **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -Safe Operating Procedures -OHS (SHARE) objectives HARE goal monitoring -Action plans -Safety and health program objective records -Objective implementation plans -OHS correspondence -Data analysis -Briefings and action plans **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Verification of OHS objective implementation (as applicable)
Processes/Evaluation Criteria: **(Rank 1-5)** 1. Has the Designated Agency Safety and Health Official provided assistance to the Director in establishing Goals and objectives for reducing and eliminating occupational accidents, injuries, and illnesses? _____ 2. Does the bureau have clear, measurable, goals and objectives? _____ 3. Are the goals and objectives communicated throughout the organization? _____ 4. Is emphases placed on the critical few objectives that will provide the greatest improvement in employee safety and health and risk reduction? _____ 5. Are managers/employees aware of their responsibilities and goals under the SHARE or other national initiatives? _____ 6. Does the bureau evaluate success in achieving established goals and objectives? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: e. Safety and Occupational Health Training

Assessed Element: (i) Mandatory Safety and Occupational Health Training.

OHS Section Goal(s): All employees are provided appropriate safety and health training to conduct their work in a safe manner.

Recommended Performance Metric(s): Evidence that training is available and delivered that address hazards affecting employees

OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 13 Safety and Health Training

Interviewees: Managers, Supervisors, OHS Safety committee members, OHS staff, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Education and training plans
-Training program for employees with safety and health responsibility
-Education/training plans
-Budgets and staffing for training new employees/new supervisors
-Training records
-Who requires training vs. who received

Observations Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Physical observations to verify if OHS practices are followed (as applicable)

Processes/Evaluation Criteria: **(Rank 1-5)**

1. All employees, including new employees receive basic safety and health training that includes employee rights and responsibilities, and the basic safety and health hazards in the workplace? _____
2. Is safety and health training integrated into job specific training and are training records maintained? _____
3. Does the Bureau provide top management officials with safety and health orientation and appropriate training? _____
4. Does the Bureau provide safety and health training for supervisory employees? _____
5. Are representatives of employee groups provided with safety and health training? _____
6. Is a retrievable record keeping system established that provides for appropriate retraining, makeup training, and modifications to training? _____
7. Is all mandatory training identified, provided and current? _____
8. Does the Bureau provide specialized job safety and health training appropriate to the work performed by the employee? ____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: e. Training and Awareness
Assessed Element: (ii) Training for Safety and Occupational Health Professionals
OHS Section Goal: Bureaus have well developed full time safety professional staff.
Recommended Performance Metric(s): Recommended DOI Core Competencies Training provided.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960; Chapter 12 Staffing Safety and Health Positions; Chapter 12 Professional Development
Interviewees: Leadership management and safety and health staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur; Operations where safe-efficient/unsafe-inefficient activities can be witnessed.
Processes/Evaluation Criteria: **(Rank 1-5)** 1. Does professional development encourage certification? _____ 2. Does the Bureau provide specialized training for safety and health professionals? _____ 3. Are safety and health inspectors trained commensurate with assignments? _____ 4. Are safety and occupational health professional trained to operate evaluation equipment? _____ 5. Does the Bureau implement career development programs to meet present and future program staffing needs of the agency? _____ 6. Is career development provided for professional safety and health staff? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: **e. Training and Awareness**
Assessed Element: (iii) Training for Collateral Duty Safety and Health Officers and Safety Committee members.
OHS Section Goal: Bureaus have well developed CDSHO staff and safety committee members.
Recommended Performance Metric(s): Recommended DOI Core Competencies Training provided.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960; Chapter 12 Staffing Safety and Health Positions; Chapter 12 Professional Development; Chapter 28 Collateral Duty Safety/Health Officers
Interviewees: Leadership management and safety and health staff **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations** Workplaces where physical inspections of facilities may occur; Operations where safe-efficient/unsafe-inefficient activities can be witnessed.
Processes/Evaluation Criteria: 1. Within six months of an appointment to a collateral duty safety and health position or to a safety committee, does the Bureau provide training commensurate with the scope of their assigned responsibilities? _____ 2. Does the Bureau provide specialized training for CDSHO or committee members? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: **e. Training and Awareness**
Assessed Element: (iv) Promotional and Awareness Programs.
OHS Section Goal: Effective means are established to inform all employees of safety and health information and promote safety and health program awareness.
Recommended Performance Metric(s): Assessment indicates adequate safety awareness
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 1 Authority, Purpose, Policy**;** Chapter 2 Responsibilities; Chapter 4 Safety and Health Standards, Procedures and Guidelines
Interviewees: Managers, Supervisors, OHS Safety committee members, OHS staff, Employees and Union representatives **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Does the Bureau provide safety and health related publications, posters, newsletters, or other media? _____ 2. Does the Bureau provide technical information, documents, books, standards, codes, periodicals, and publications? _____ 3. Has the Bureau conducted any special activities based on injury/illness causal factors? _____ 4. Are employees involved through the use of incentive or other promotional programs? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: **f. Program Implementation and Operation**

Assessed Element: (i) Accident Reporting and Investigation

OHS Section Goal: An effective program that will provide for prompt reporting and investigation of accidents and "near miss" incidents, so that their causes, and the means for their prevention, are identified.

Recommended Performance Metric(s): Reduce Top Lost Time Injury and Illness Rates for work locations with the highest lost time rates.

OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 7 Incident/Accident Reporting/Serious Accident Investigation

Interviewees: Selected managers and supervisors, OHS staff, Employees and Union representatives

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Safe Operating Procedures for Incident Investigation and accident review boards
-Accident Review Boards
-SMIS reports
-Incident investigation reports
-Last 3 years OSHA logs
-Tour facilities/compare conditions to incident investigation action items

Processes/Evaluation Criteria: (Rank 1-5)

1. Are accidents, near miss or other incidents timely entered into the Safety Management Information System (SMIS)? _____
2. Are reports systematically reviewed by trained safety personnel? _____
3. Does the Bureau have a protocol for reporting serious accidents and fatalities to OSHA within 8 hours? _____
4. Are all accidents investigated by the responsible supervisor? _____
5. Are root causes identified as appropriate and corrective measures to prevent recurrence implemented? _____
6. Does the Bureau investigate accidents involving property damage only? _____
7. Is a serious accident investigation team convened for all serious accidents, or incidents, and are serious accident investigation procedures followed? _____
8. Are the SAI reports reviewed by appropriate officials? _____
9. Does the Bureau provide the DOI DASHO with a summary report of each fatal and catastrophic accident investigation? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: **f. Program Implementation and Operation**
Assessed Element: (ii) Industrial Hygiene and Occupational Medicine
OHS Section Goal(s): An occupational health program is appropriate for the nature of the work and its hazards. Policies and procedures are available to all employees.
Recommended Performance Metric(s): Exposure assessments are conducted and corrective actions are implemented
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 17 Industrial Hygiene Program; Chapter 18 Occupational Medicine Program; Chapter 20 Personal Protective Equipment; DOI Occupational Medicine Handbook
Interviewees: Managers, Supervisors, OHS staff and Employees **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -List of employees in medical surveillance programs -Management statements of program design -Lists of employees in medical surveillance programs -Workplace monitoring records -Exposure assessment information in JHAs -Hazardous materials lists **Observations:** Workplaces where physical inspections of facilities may occur and operations where safe-efficient/unsafe-inefficient activities are witnessed. -Tour facilities for existence of health hazards, chemical use, noise sources, etc. and compare to exposure assessments
Processes/Evaluation Criteria: **(Rank 1-5)** 1. Is there documented expectations for monitoring of health hazards? _____ 2. Are bureau managers aware of and responsive to occupational health needs? _____ 3. Does the Bureau have consolidated monitoring data on which they base occupational health decisions? _____ 4. Is the monitoring data collected on a sustained basis, and is statistical analysis on the data performed? _____ 5. Is there an occupational medical surveillance program? _____ 6. Are required medical surveillance program elements based on employee exposure? _____ 7. Are employees encouraged to report early signs or symptoms of perceived job-related illness? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: f. Program Implementation and Operation
Assessed Element: (iii) Fire Protection and Prevention
OHS Section Goal(s): Written procedures are established and communicated to employees for their protection.
Recommended Performance Metric(s): Existence of fire protection and prevention plans and evidence of drills and other communications and training for all affected employees.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 19 Fire Safety
Interviewees: Managers, Supervisors, EMS staff, AED/CPR responders, First Aid responders, Program managers and OHS staff, Employees, Emergency Management staff and Law Enforcement **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -Safe Operating Procedures -Emergency Action Plans -Authority delegation -Drills reports -Site inspection reports -SMIS data **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Drills, signage, maps, exit marking, designated shelters, assembly areas -Shelter in place signage and supplies -Posted plans
Processes/Evaluation Criteria: (Rank 1-5) 1. Has a fire hazard analysis been conducted of the facilities and operations under Bureau control? _____ 2. Is fire prevention and protection included in a comprehensive facilities inspection? _____ 3. Are the National Fire Codes incorporated into new designs for construction? _____ 4. Are existing facilities maintained and in conformance with the National Fire Codes? _____ 5. Have fire emergency response plans, primarily concerned with the safety of employees and the public been developed? _____ 6. Are fire evacuation drills conducted as required? _____ 7. Is there a Bureau policy for coordination with the local fire responder? 8. Are there procedures for accounting for all employees and visitors? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: **f. Program Implementation and Operation**

Assessed Element: (iv) Occupant Emergency Planning (Other than fire)

OHS Section Goal(s): Written procedures are established and communicated to employees for their protection and evacuation in the event of a unexpected or disastrous event, inclusive of training and conducting drills annually.

Recommended Performance Metric(s): Existence of Employee Emergency Action plans and evidence of drills and other communications and training for all affected employees

OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 19 Fire Safety

Interviewees: Managers, Supervisors, -EMS staff, AED/CPR responders, First Aid responders, Program managers and OHS staff, Employees, Emergency Management staff and Law Enforcement

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Safe Operating Procedures -Emergency Action Plans -Authority delegation
-Drills reports -Site inspection reports -SMIS data

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Drills, signage, maps, exit marking, designated shelters, assembly areas -Shelter in place signage and supplies
-Posted plans

Processes/Evaluation Criteria: (Rank 1-5)

1. Are the types of hazards that could affect bureau operations identified? _____
2. During the emergency event, management has considered options for protecting employees and property? _____
3. Have safety responsibilities been identified in the Incident Command System? _____
4. Have emergency drills been conducted as required? _____
5. Are emergency response plans and drill performance reviewed by qualified professionals? _____
6. Are employees trained in emergency procedures, to manage their own safety during an emergency event? _____
7. Are there procedures for accounting for all employees and visitors? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: f. Program Implementation and Operations
Assessed Element: (iv) Motor Vehicles and Motorized Equipment
OHS Section Goal: Ensure Motor Vehicles and Motorized Equipment is operated safely
Recommended Performance Metric(s): Reduce motor vehicle accidents
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, DM Chapter 16
Interviewees: Managers, Supervisors, OHS staff and employees **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) 1. Does the Bureau require the employee to possess a valid State driver's license for the class vehicle to be operated? _____ 2. Are employee driver records verified at least annually? _____ 3. Do personnel operating specializes vehicles (i.e. forklifts, drill rigs, 4x4 vehicles, all-terrain vehicles (ATVs), snowmobiles, vehicles with greater than 1-ton capacity, or towing vehicles) have the skills, knowledge, and obtain supervisory authorization for vehicle use? _____ 4. Does the Bureau have a policy requiring mandatory use of seat belts, and is the policy enforced? _____ 5. Do employees wear appropriate PPE when operating specialized vehicles? _____ 6. Does the Bureau have policy regarding the use of cellular phones while the vehicle is in motion? _____ 7. Do all employees who operate a motor vehicle receive defensive driving training? _____ 8. Is there a Bureau policy for vehicle safety inspections, and are the inspections documented? _____ 9. Is there a Bureau policy for motor vehicle accident kit contained within the vehicle? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: **f. Program Implementation and Operations**

Assessed Element: (v) Contractor Safety

OHS Section Goal(s): Contractors and their employees are held responsible for complying with OSHA and other applicable safety policies and regulations.

Recommended Performance Metric(s): Evidence of safety requirements and oversight in contracting documents and processes.

OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, , Chapter 24 Contractor Safety**,** Chapter 25 Concessionaire Safety

Interviewees: Selected Contracting Officers, Managers, Supervisors, OHS staff, COTRs and Awarding Officials

Documents/Records: Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness.

-Safe Operating Procedures -Contractor OHS programs -Contractor DART Rates
-Selected contractor assessments, and evaluations -Selected contract reviews -Correspondence with customers and other contractors
-Contractor work related injury/illness data, accident records-Relevant incident investigation reports

Observations: Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.

-Contractor work places

Processes/Evaluation Criteria: (Rank 1-5)

1. Is safety and health performance considered in the procurement process? _____
2. Is the contractor required to develop and furnish a site specific safety and health plan? _____
3. Are host and contractor safety plan/activities coordinated? _____
4. Does the Bureau have a policy to require contractors to conform to OSHA regulations and other legal requirements? _____
5. Are contractor safety performance and practices monitored by the COTR? _____
6. Have COs, CORs and COTRs received appropriate safety and health training? _____
7. Does the COTR, through the CO, have authority to stop contractor practices that expose bureau or contractor employees to hazards? _____
8. Does management provide contractors information regarding existing hazards at the site/workplace? _____
9. Is safety and health considered with service contracts? _____

OHS Section Ranking ____

5-Outstanding
4-Exceeds
3-Met
2-Partially Met
1-Not Present

OHS Component: **f. Program Implementation and Operations**
Assessed Element: (vi) Procurement and Design Reviews
OHS Section Goal: Establish requirements for the review of supplies, goods and equipment for potential risk exposure prior to procurement.
Recommended Performance Metric(s): Organization examines and evaluates safety and information supplies, goods and equipment prior to purchase.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, Chapter 24 Contractor Safety**,** Chapter 25 Concessionaire Safety
Interviewees: Selected Contracting Officers, Managers, Supervisors, OHS staff, COTRs and Awarding Officials **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness. -Safe Operating Procedures -Contractor OHS programs -Contractor DART Rates -Selected contractor assessments/evals. -Correspondence w/customers, other contractors -Contractor work related injury/illness data, accident records -Relevant incident investigation reports -Selected contract reviews **Observations:** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed. -Selected purchased Products -Selected staffing contracts -Selected service contracts
Processes/Evaluation Criteria: (Rank 1-5) 1. Does the Bureau use Material Safety Data Sheets (MSDS) when purchasing hazardous materials? _____ 2. Does the Bureau review new or modified equipment, facilities or processes for safety and health hazards prior to exposing employees to their operation? ____ 3. Are procured products listed or labeled by a National Testing Laboratory? _____ 4. Are written standards developed to help guide the procurement office (485 DM)? _____ 5. Is there involvement of the safety, health and accessibility functions in new facility design documents reviews and renovations, modifications or occupancy changes in existing facilities? _____
OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

OHS Component: **f. Program Implementation and Operation**
Assessed Element: (vii) Specialized Programs/High Hazard Activities
OHS Section Goal(s): Policies are developed and networking is established that integrates safety processes into all high hazard and specialized safety program activities
Recommended Performance Metric(s): Written programs for the specialized programs have been developed and implemented.
OSHA/Department Manual Reference(s): OSHA Instruction FAP 2.1B JUN 19 1989; the Act; E.O. 12196; 29 CFR Part 1960, DM Chapter 15 Aviation Safety, Chapter 22 Watercraft Safety, Chapter 27 Underwater Diving Safety, 353 DM 1.2
Interviewees: Managers, Supervisors, OHS staff and employees **Documents/Records:** Documented processes that a bureau has implemented in furthering its OHS program. Specific records used to evaluate conformance to OHS regulations, mandates, DOI goals and the bureau's OHS program and its effectiveness **Observations** Workplaces where physical inspections of facilities may occur but also operations where safe and efficient or unsafe and inefficient activities can be witnessed.
Processes/Evaluation Criteria: (Rank 1-5) **WATERCRAFT (DM Chapter 22):** 1. Does the Bureau have a watercraft program? _____ 2. Are periodic evaluations conducted? _____ 3. Does the Bureau require float plans? _____ 4. Are Job Hazard Analysis conducted? _____ 5. Are operators of watercraft are adequately trained, properly tested and certified? _____ 6. Are all persons required to wear a U.S. Coast Guard-approved personal flotation device (PFD)? _____ 7. Do all employees who operate or work in watercraft maintain certification in American Red Cross Standard First Aid, or equivalent, and CPR?_____ **AVIATION (DM Chapter 15):** 1. Are all aircraft services procured through the National Business Center, Division of Aviation Management (DAM)? _____ 2. Are supervisors and employees in aviation management provided aviation user safety training? _____ 3. Have all persons who fly missions or supervise aviation activities under operational control of the bureau received the required aviation user safety training? _____ 4. Prior to each contract flight, do personnel visually inspect the pilot qualification and aircraft data cards for current authorization by DAM? _____ 5. Are all aircraft accidents or incidents that don't warrant investigation by NTSB investigated using the SAIT process? _____ **UNDERWATER DIVING (DM Chapter 27):** 1. Does the Bureau have a underwater diving program? _____ 2. Does the Bureau have a diving safe practices manual? _____ 3. Are all employees who perform underwater diving activities adequately trained and physically qualified? _____ 4. Is a Dive Plan and Dive Hazard Analysis conducted for each dive? _____ 5. Do divers receive First Aid, CPR and oxygen first aid? _____ 6. Are records maintained as mandated? _____ **FIREARMS (DM Proposed Chapter):**

OHS Section Ranking ____ 5-Outstanding 4-Exceeds 3-Met 2-Partially Met 1-Not Present

Once the work on the Evaluation Tool is completed, the reviewer will summarize their scores in the Assessment Rating Table (below).

Evaluation Rating Table For This Tool:

Organizational Component and Assessment Elements:	**Rating**
a. Leadership and Management	**(1)**
(i) Commitment, Involvement and Communication	
(ii) Responsibility and Accountability	
(iii) Financial Resources	
(iv) Personnel Resources	
(v) Policy	
(vii) Program Promotion and Recognition	
b. Employee Involvement	
(i) Safety Committees	
(ii) Program Involvement	
c. Hazard Recognition and Prevention	
(i) Inspection, Identification and Prioritization of Deficiencies	
(ii) Hazard Control and Abatement	
(iii) Unsafe and Unhealthful Condition Reporting	
(iv) Process/Operational Hazard Analysis, Management of Change	
d. Evaluation and Analysis	
(i) Program Evaluations and Assessments	
(ii) Accident Analysis and Prevention	
(iii) Data Analysis, Performance Metrics, Management Review/Follow up:	
d. Training and Awareness	
(i) Mandatory Safety and Occupational Heath Training	
(ii) Training for Safety and Occupational Health Professionals	
(iv) Promotion & Awareness Programs	
e. Program Implementation and Operation	
(i) Accident Reporting and Investigation	
(ii) Industrial Hygiene & Occupational Medicine	
(iii) Fire Protection and Prevention	
(iii) Motor Vehicles & Motorized Equipment	
(iv) Contractor Safety	
(v) Procurement and Design Reviews	
(vii) Specialized Programs and High Hazard Operations	
Composite Safety and Occupational Health Program Rating	**(2)**

Evaluation Rating Table Notes: (1) Composite rating for the category.
(2) Composite rating for the Assessment.

Once the field work on the Evaluation Tool is completed, the Team will meet and prepare a findings document which will include a Summary Assessment Rating Table that will be presented to the head of the bureau or office at the closing conference.