



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240



Mr. Francis Yebesi  
Director, Office of Federal Agency Programs  
U.S. Department of Labor – OSHA  
Directorate of Enforcement Programs  
Office of Federal Agency Programs  
Room N-3622  
200 Constitution Avenue, NW  
Washington, D.C. 20210

Dear Mr. Yebesi:

The Department of the Interior is pleased to submit to the Secretary of Labor, its Annual Occupational Safety and Health Report of Fiscal Year 2013 in accordance with Section 19(a)(5) of the Occupational Safety and Health Act.

The Department of the Interior continued to make significant improvements in its Occupational Safety and Health Program in FY 2013. These accomplishments are highlighted in the accompanying Annual Report, and plans are in place for further improvements in FY 2014. The report contains all requested information on the Department's Occupational Safety and Health Program, leadership and guidance, and support of its offices and bureaus in the accomplishment of their occupational safety and health responsibilities.

If you have any questions, or would like additional information, please contact me at (202)208-4505 or [mary\\_pletcher@ios.doi.gov](mailto:mary_pletcher@ios.doi.gov).

Sincerely,

Mary F. Pletcher  
Deputy Assistant Secretary for Human Capital  
and Diversity and Deputy Designated Agency  
Safety and Health Official

Enclosures

*Department of the Interior*  
*Annual Occupational Safety and Health Report*



**Office of Occupational Safety and Health**

**1849 C Street, NW - MS 5558**

**Stuart Lee Udall Building**

**Washington, DC 20240**

**May 2014**

**FY 2013 ANNUAL OCCUPATIONAL SAFETY & HEALTH REPORT TO THE SECRETARY OF LABOR**

Name of Department: **United States Department of the Interior (DOI)**

Address: **1849 C Street, NW  
MS 5558  
Stuart Lee Udall Building  
Washington, D.C. 20240**

Number of Federal civilian employees this report covers: **71,766**

Number of Bureaus this report covers: **9**

- **Bureau of Land Management (BLM)**
- **Bureau of Ocean Energy Management (BOEM)**
- **Bureau of Safety and Environmental Enforcement (BSEE)**
- **Bureau of Reclamation (BOR)**
- **Indian Affairs (IA)**
- **National Park Service (NPS)**
- **Office of Surface Mining (OSM)**
- **United States Fish and Wildlife Service (FWS)**
- **United States Geological Survey (USGS)**

	<b>Name</b>	<b>Official Title</b>	<b>Telephone</b>	<b>E-mail</b>
<b>DASHO:</b>	Rhea S. Suh	Assistant Secretary for Policy, Management and Budget	202-208-1927	Rhea_Suh@ios.doi.gov
<b>Deputy DASHO:</b>	Mary F. Pletcher	Deputy Assistant Secretary for Human Capital and Diversity	202-208-1738	Mary_Pletcher@ios.doi.gov
<b>OSH Manager:</b>	Diane B. Schmitz	Director, Office of Occupational Safety and Health	202-219-0189	Diane_Schmitz@ios.doi.gov

Please see Appendix 1 for the Department’s sub-agency Occupational Safety and Health (OSH) contact information.

I. ASSESSMENT OF OCCUPATIONAL SAFETY & HEALTH PROGRAM ACTIVITIES AND EVENTS:

a. *Federal Government-wide & Presidential Initiatives.*

Continuity of Operations (COOP) Plans.

The DOI OSH works closely with Emergency Management (EM) to assist in development of COOP directives, Occupant Emergency Plans, and general disaster planning. Specific examples include reviewing emergency management policies to ensure safety and occupational health input and safety staff attendance at emergency management meetings. The DOI Safety and Health Council (SHC) performs EM directive reviews and makes safety and health recommendations to the Designated Agency Safety and Health Official (DASHO) Council for senior level action. As requested by OSHA, below are COOP highlights of Bureau programs, to include COOP actions related to natural and/or man-made disasters.

The BLM COOP program is a component of the bureau's safety and health division. This allows for a cross-pollination of safety and continuity initiatives, planning, and response activities. The safety division chief is also the bureau emergency manager. One of the safety manager's ancillary responsibilities is as an alternate on the headquarters COOP team. As requested, the following is a review of a man-made disaster event and the BLM's response to it:

September 2013 Navy Yard Shooting - This incident occurred within a quarter-mile of the local BLM office, generating much concern among the employees about an active shooter situation. As a result, the following changes are being implemented:

- Revising the BLM incident management team, composed of managers and employees, to reflect the Incident Command System (ICS) to better define roles and responsibilities
- Integrating on-site law enforcement policy staff into a more visible role in planning and operations during an incident
- Adding on-site law enforcement to the department's COOP team
- Planning a series of tabletop exercises and training events with BLM safety, emergency management, and bureau, DC, DOI, and Federal Protective Service law enforcement professionals to culminate in a comprehensive active-shooter plan for employees
- Revise the occupant emergency plan to incorporate the ICS roles and active shooter strategies for employees

The FWS Division of Safety & Health works closely with EM in developing COOP directives, Occupant Emergency Plans, and disaster planning. Specific examples include reviewing emergency management policies to ensure safety input, safety staff attending emergency management/security meetings, and ensuring safety station plans

incorporate proper emergency planning data. Furthermore, Region Safety Managers are usually assigned the role of safety manager and emergency manager, which ensures the incorporation of safety and health into emergency/disaster response.

The NPS has incorporated telework agreements with significant numbers of its employees so in the event of a catastrophic event—to include outbreaks—NPS employees will be able to work from alternate locations to ensure continuity of operations while maintaining social distancing to reduce the risk of exposure. The NPS along with the DOI and its other bureaus, periodically practices its COOP plans to identify areas of weakness and to make corrective actions before an incident requiring activation occurs.

The USGS has a *Hazard Response Executive Committee (HREC)* which provides executive direction, oversight, and support to USGS managers in responding to major hazard events and also facilitates actions across the Bureau on an as-needed basis, without interfering with the activities of programmatic or ad hoc response teams. In responding to natural disasters, the USGS has a responsibility to ensure effective coordination across the Bureau in order to eliminate redundancies, share resources, provide consistent and timely communications, and ensure that response teams receive timely support from Bureau leadership. The USGS HREC performs this function.

To assist in responding to natural and potential manmade disasters, the USGS has established the *Geospatial Information Response Team (GIRT)*. The primary purpose of the GIRT is to ensure rapid coordination and availability of geospatial information for effective response by emergency responders and land and resource managers and to ensure coordination and availability of this information for scientific analysis. The GIRT is responsible for establishing monitoring procedures for geospatial data acquisition, processing, and archiving; ensuring discovery, access, and delivery of data; anticipating geospatial needs; and providing relevant geospatial products and services.

### Motor Vehicle Safety

Interior complies with E.O. 13513, *Federal Leadership on Reducing Text Messaging While Driving* and with E.O. 13043, *Increasing Seat Belt Use in the United States*. Departmental and Bureau policies require employees to wear seat belts and prohibit cell phone use or other similar media devices that cause operator distraction while operating a government motor vehicle or private motor vehicle while on official government business. DOI employees are educated through a variety of educational sources to include defensive driver training courses and safe driving awareness campaigns about the dangers of cellular phone use and text messaging while driving.

Additionally, Interior policy requires Federal employees who regularly operate a Government, rental, or privately owned motor vehicles for the Department, or a contractor employee who regularly operates a government motor vehicle, to possess a valid state/international license for the class of vehicle operated. In Bureaus where school-age children are transported, drivers are required to be licensed in accordance

## FY 2013 ANNUAL OCCUPATIONAL SAFETY & HEALTH REPORT TO THE SECRETARY OF LABOR

with regulations administered by the Federal Highway Administration and the States wherein the children are transported.

Interior became a corporate member of the National Safety Council (NSC) in July 2011 and, through the General Services Administration, make the NSC *Defensive Driving Course* available to all employees who use government vehicles. Several Bureaus are incorporating the NSC's Defensive Driving Training course into their respective motor vehicle operational policies, which require initial training followed by refresher training every three years.

### Protecting Our Workers and Ensuring Reemployment (POWER).

The POWER Initiative extended prior Federal Government workplace safety and health efforts by establishing more aggressive performance targets, encouraging the collection and analysis of data on the causes and consequences of frequent or severe injury and illnesses, and prioritizing safety and health management programs that have proven effective in the past. The FY 2013 DOI Total Case Rate (TCR) and Lost Time Case Rate (LTCR) goals of 5.17 and 1.81 incorporated a 1% reduction from the previous FY actual results. The DOI achieved its FY 2013 LTCR POWER goal of 1.81 and nearly met its POWER TCR goal of 5.17 with an actual POWER TCR of 5.18.

<b>DOI POWER Goals</b>	<b>FY 2009 Baseline</b>	<b>FY 2013 Target</b>	<b>FY 2013 Actual</b>
Reduce Total Case Rate	6.03	5.17	5.18
Reduce Lost Time Case Rate	2.08	1.81	1.69

Interior experienced 3,876 injury and illness cases in FY 2013. Forty-six percent (46%) of all injury and illness incidents experienced by DOI employees in FY 2013 were related to two causal factors: slips, trips, and falls and material handling. The data used to complete the DOI's injury and illness rate chart was obtained from results released on the DOL's Occupational Safety and Health Administration's (OSHA) Federal Injury and Illness Statistics webpage.

### Telework Enhancement.

Interior encourages telework through a robust program in which all eligible employees may be authorized to telework as outlined in Department policy. Interior implemented the telework program by creating a chapter in the Department's policy manual – 370 Departmental Manual (DM) 226. This chapter is supplemented by a handbook and these two documents establish policy and procedures for Bureaus and Offices to develop and deploy their programs. The policies and procedures in the DM chapter and the Handbook are based on the 2010 *Telework Act*. Interior recognizes that telework locations may present risk to employee safety and health and has incorporated appropriate procedures in its policy. The Handbook provides that Interior officials may

access the telework site to ensure a safe environment exists for teleworking, and in the event of an accident, to investigate the accident to determine measures to prevent recurrence. The DOI teleworkers must immediately report any work-related accident occurring at the telework site and provide their supervisor with all relevant medical documentation related to the accident. There were no telework injuries or illnesses reported in FY 2013.

*b. Fatalities & Catastrophic Events.*

The DOI suffered three work-related fatalities in FY 2013. The Bureaus experiencing a fatality or catastrophic event were: NPS – two fatalities; and BLM – one fatality. Please see the summary of fatalities & catastrophic events, in Appendix 2 for summation of each event.

*c. 29 CFR 1960 Requirements.*

Field Federal Safety & Health Councils

The Interior DASHO is a member of the Federal Advisory Council on Occupational Safety and Health and staff members attend the meetings and support the Council's activities. Employees in DOI regional offices, which are most likely to be located in urban centers, are encouraged to be active participants in Field Councils. Due to the remoteness of many sites, Interior has not focused on participation in the activities of Field Councils outside regional offices. However, Interior encourages employees at remote sites to collaborate with other Federal, state, or local entities to share occupational health and safety training and educational resources, as they deem appropriate.

Safety & Health Management System Response to the Inspection Process

*1. Inspection and Abatement System (IAS)*

The OSH's SMIS team completed design and is now testing an IAS module for Departmental use. The IAS module will provide a method of reporting and tracking hazard findings, creating and recording annual inspection plans, and creating compliance and other reports for DOI facilities.

*2. OSHA Inspections at DOI Sites*

Hazard notices received at the Departmental level are sent to the appropriate DOI Bureau National Office for corrective action and coordination with the respective regional office. There have been instances in the past where hazard notices were issued by an OSHA area office and went unabated without the knowledge of OSH or a Bureau's National Office. It would be advantageous for OSHA area offices to submit a second copy of all citation notices directly to the respective Bureau's National Office for coordination of abatement and continued tracking. Keeping

## FY 2013 ANNUAL OCCUPATIONAL SAFETY & HEALTH REPORT TO THE SECRETARY OF LABOR

the Bureau's National Office abreast of these notices would potentially decrease the likelihood of a "failure to abate" and would improve the timeliness of information sharing. Reporting indicates that OSHA issued *Notices of Unsafe or Unhealthy Working Conditions* (Notice) to the following Bureaus:

### BLM

During FY 2013, twelve unannounced OSHA inspections were conducted at 8 Bureau locations in California, Idaho, and Nevada. For all inspections that resulted in the issuance of Notice, those violations were abated with the majority being corrected during the inspection process. Documentation of those abatements was sent to the local OSHA area office and all of those cases are now closed. There were no appeals to an OSHA notice during FY 13.

### USGS

OSHA conducted five inspections at USGS facilities during FY 2013; four of which were from OSHA's Region 10 Office. Although 29 Notices or violations were identified, most conditions were abated prior to final report issuance. The USGS uploads all OSHA inspections within the Bureau's Inspection and Abatement System (IAS) under the respective audited organization, which then tracks and documents abatement in the same fashion as if the condition were identified via internal audit. There were no extraordinary challenges within the Bureau regarding notice issuance.

### NPS

The 401 National Park Areas across the United States routinely receive inspections. Once received, the local unit contacts its regional office and ultimately, the National office. The NPS ensures prompt responses are provided to the Area Office in writing within the due date listed on the Notice. The identified hazard is assigned a Risk Assessment Code and abated or mitigated to a lower level of risk. Upon completion, a letter endorsed by the local superintendent is issued to the Area Office with the date of correction and the actions taken to correct the hazard. The National Park Service did not appeal an issued Notice of Hazard during Calendar Year 2013.

### IA

During FY 2013, OSHA issued one *Notice of Unsafe or Unhealthy Working Conditions* at the Western Nevada Agency, field administrative office, located in a GSA leased building.

## FWS

Reporting indicates that the FWS received seven OSHA citations in FY 2013. The abatements were handled at the local and region level; no challenges were reported with the issuances of the notices/responses to the notices.

### Training of Overseas Federal Employees

In FY 2013, the Department had 550 employees who were stationed in overseas locations. Bureaus are responsible for assuring safety and health programs for overseas employees are implemented and congruent with Department and Bureau safety and health policy. All Department employees stationed outside of the U.S. are required to follow Department and U.S. State Department protocols for safety and security, including requirements for immunizations when necessary and mandated.

Interior's online training system, *DOI Learn*, was used to provide the preponderance of its safety training to its employees, including those located in outside continental U.S. locations. Additionally, during Calendar Year 2013, the NPS sent instructors to teach its behavior based safety program, *Operational Leadership*, to its employees in American Samoa, the US Virgin Islands, and Puerto Rico where over 100 total employees attended the various classes.

### Whistleblower Protection Program

The DOI Office of Inspector General (OIG) relies on whistleblowers to accomplish its statutory mission to detect and prevent fraud, waste, mismanagement and violation of law, rule or regulation. The OIG established the Whistleblower Protection Program (WBPP) in 2003. Since that time, the OIG has made whistleblower protection a top priority and beginning in 2010 focused on three hallmarks of whistleblower protection: education, prevention and advocacy.

Through the WBPP, DOI employees are educated on their rights and managers are educated on their responsibilities under the *Whistleblower Protection Act* of 1989, *No Fear Act* of 2002 and related merit systems principles. Prevention is achieved through education together with prompt and thorough informal or formal whistleblower reprisal investigations. As a predicate to an OIG investigation, and if appropriate to the facts, the OIG may advise senior level department officials of complaints so that the official(s) can promptly intervene, prevent and correct retaliation. The WBPP monitors these referrals to assure management has responded to the complaint.

The WBPP advocates for and communicates regularly with the whistleblower to provide support and to promote full and fair resolution of their complaints. Where informal resolution is not possible, advocacy extends to assisting whistleblowers in filing formal complaints with the Office of Special Counsel and providing continued support as requested to include further investigation.

d. Special 29 CFR 1960 Reporting.

Certified Safety & Health Committees

Interior does not have Certified Safety and Health Committees, per 29 CFR Part 1960.78(b).

**II. SAFETY & HEALTH MANAGEMENT SYSTEM (SHMS) SELF-EVALUATION.**

**Overall Assessment.**

Attribute Rating System	
Rating	Definition
0	The attribute does not exist.
1	The attribute needs major improvements.
2	The attribute needs minor improvement.
3	The attribute is highly effective.
NA*	The attribute is not applicable.

DOI Safety & Health Management System Overall Assessment Score				
0	1	2	3	NA
		✘		

**Summary of Self-evaluation.**

The DOI SHMS is rated as a “2 - Needs Minor Improvement.” Please see appendix 4 for a detailed explanation for each assessment element. Interior currently employs more than 175 full-time occupational safety and health professionals who support on average approximately 71,000 employees and 300,000 volunteers. Interior currently has 2,127 establishments throughout the nation and some sites are remote field offices that do not have the staffing to support full-time safety and health positions, so approximately 1,200 Collateral Duty Safety Officers (CDSO) play a critical role in the Department’s SOH program. Both full-time safety and the CDSO professionals work at all levels within DOI’s Bureaus to assure program compliance and integration of safe and healthful practices throughout a wide range of complex activities. Lastly, Interior is operating in an environment of constrained resources. Resources are prioritized based upon the most critical health and safety issues.

Identifying and controlling accident and incident trends is an ongoing effort by the DOI. DOI’s Safety Management Information System (SMIS) is the primary source of

## **FY 2013 ANNUAL OCCUPATIONAL SAFETY & HEALTH REPORT TO THE SECRETARY OF LABOR**

information used by Interior managers and professional safety and health staffs to identify trends and develop control strategies. SMIS is designed for use at any level within the DOI, provides for the electronic filing of the Office of Worker's Compensation Program injury and illness reports, and can generate reports for any DOI organization or combination of organizations.

Interior uses the SMIS to identify facilities with high injury and illness rates. Managers and safety and health professionals use the unique reporting features to analyze the accident case history and injury and illness rates at facilities within their Bureaus to identify trends and major causes of incidents. An Exposure Assessment (EA) module was added to SMIS that will categorize all tasks, associated risks, and occupational exposures at a given DOI site/facility. The SMIS EA is the product of the Department's industrial hygiene working group collaborating with OSH's Division of Industrial Hygiene and Occupational Medicine.

The OSH SMIS team is finalizing an inspection and abatement (IAS) module for Departmental use. The IAS module will be designed to provide a method of reporting and tracking safety findings, creating and recording annual inspection plans, and creating compliance and other reports within all DOI facilities. This module will be finalized and deployed in late FY 2014.

In addition to SMIS reporting, Interior uses a Risk Assessment System, which assigns a Risk Assessment Code (RAC) to an identified hazard. The RACs assist safety and health staffs and program managers in determining the extent of the risk to employees and the priority for mitigation.

DOI launched a safety and occupational health evaluation program in FY 2011. By the end of FY 2014, all DOI Bureaus will have received an evaluation. The safety and occupational health program evaluations are an assessment of a Bureau level program to verify it complies with DOI's policies and requirements, and conforms to good safety and occupational health practices. The evaluation program also identifies program successes and best practices that can be shared Department wide. Action plans are requested from the Bureau Directors that address the correction of weaknesses found during the evaluation.

### **III. FY 2014 GOALS.**

#### **DOI WIDE GOALS.**

- Enhance the role of leadership in promoting a culture of safety
- Engage employees in reaching safety and health commitments
- Identify, evaluate, and control employee exposures to workplace hazards
- Implement, evaluate, and continuously improve the DOI Safety and Health Management System and meet or exceed all Federal safety and health regulations and requirements

**Bureau Specific Goals.**

a. BOR

- Review and revise BOR SOH programs and policies
- Improve Safety and Occupation Health culture
- Address significant BOR occupational health program needs
  - Publish Hearing Loss Prevention Program policy
  - Publish Exposure Assessment Compliance
- Publish Accident Investigation and Reporting policy
- Publish Buy Quiet policy
- Noise reduction initiatives
- Increased oversight of regional SOH programs (SMEs/Audits)
- Improve record keeping through the Dam Safety Information System
- Standardize format and improve consistency and implementation of the Job Hazard Analysis process safety communication

b. FWS

- Execute Service headquarters Division of Safety and Health completion of regional safety and health evaluations: FY 2014: Regions 1 and 8
- Initiate development of “Occupational Hazards Control” handbook
- Initiate development of Service-specific on-line OSHA Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) refresher course
- Revise policy Manual Chapters 242 FW 8, Laboratory Safety; 241 FW 1, Watercraft Safety

c. IA

- Perform regional 3-year follow-up Safety and Occupational Health Program Evaluations
- Establish Safety Committee’s at all locations within IA with more than fifteen employees
- Establish Collateral Duty Safety Officers (CDSO’s) at all locations with more than nine employees
- Become more proactive in increasing safety and hazard awareness throughout IA
- Effectively target safety training to identify needs at all levels in IA
- Increase safety awareness by promoting and encouraging employees to utilize DOI Learn on-line safety training
- Implement Safety and Health SharePoint website

d. NPS

- Develop a National Safety Strategy to assist with positive culture change toward safety, occupational health, and wellness. NPS has three key goals focused around Communications, Capacity, and System. As part of the strategy, the NPS will

## FY 2013 ANNUAL OCCUPATIONAL SAFETY & HEALTH REPORT TO THE SECRETARY OF LABOR

continue its efforts to build an effective safety management system that will lead to greater consistency in program implementation, capturing and sharing of near misses and lessons learned, and employee involvement across its 401 park areas.

- Continue implementing the NPS behavior-based safety program, *Operational Leadership*, which has directly contributed in a 33% reduction in recordable injuries over the past five years.

### e. USGS

- Continue to measure internal performance metrics

### f. BLM

- Prevent exposures and mitigate risk through recognition and following prevention programs and processes
- Employ widespread communication of safety and occupational health throughout all levels of the Bureau
- Address the competency levels of the Bureau safety professionals and CDSOs
- Ensure that safety and health training is an integral part of supervisor's training and employee's education and development
- Have effective evaluation, analysis and program oversight to foster continual improvement

## Appendix 1 - Subagency OSH Contacts

### Appendix 1 - Subagency OSH Contacts

#### **Bureau of Land Management**

Edward Jerome, Chief, Division of Safety, Health and Emergency Management  
1120 20th Street, NW  
North Building, 3rd Floor  
Washington, D.C. 20236  
202-254-3319; fax 202-418-3003; ejerome1@blm.gov

#### **Bureau of Ocean Energy Management and Bureau of Safety and Environmental Enforcement**

Rose Capers-Webb, Safety & Health Manager  
381 Elden Street, MS 2050  
Herndon, VA 20170  
703-787-1541; fax 703-787-1437; Rose.Capers-Webb@boemre.gov

#### **Bureau of Reclamation**

James Meredith, Safety and Occupational Health Manager  
P.O. Box 25007, D-1430  
Denver, CO 80225  
303-445-2695; fax 303-445-6376; jmeredith@do.usbr.gov

#### **Fish and Wildlife Service**

Mary Parkinson, Safety Manager  
4401 N. Fairfax Drive, MS 7097-43  
Arlington, VA 22203  
703-358-2255; fax 703-358-1875; Mary\_Parkinson@fws.gov

#### **Indian Affairs**

Paul Holley, Safety & Health Manager  
1011 Indian School Road, NW  
Suite 331  
Albuquerque, NM 87104  
505-563-5360; fax 505-563-5363; paulholley@bia.gov

#### **National Park Service**

Michael May, Chief, Office of Risk Management  
1201 Eye Street, NW MS-2430  
Washington, DC 20005  
202-513-7222; fax 202-371-2226; Michael\_May@nps.gov

#### **U.S. Geological Survey**

William R. Miller, Safety Manager  
12201 Sunrise Valley Drive, MS 246  
Reston, VA 22203  
703-648-7552; fax 703-648-7475; wrmiller@usgs.gov

## Appendix 1 - Subagency OSH Contacts

### **Office of Surface Mining, Reclamation, and Enforcement**

Maurice Banks, Safety & Health Manager

3 Parkway Center, Room 100

Pittsburgh, PA 15220

412-937-2840; fax 412-937-2888; [jbanks@osmre.gov](mailto:jbanks@osmre.gov)

APPENDIX 2 – FY 2013 BUREAU FATALITIES & CATASTROPHIC EVENTS SUMMARY REPORT

**BUREAU FATALITIES & CATASTROPHIC EVENTS SUMMARY REPORT FOR FY 2013**

Total number of fatalities: 3      Total number of catastrophic events: 0

**NPS Fatality/Catastrophic Event Summary Report (1)**

Fatality    Catastrophic Event      Work related? Yes  No

Number of employees injured: 1

Date of Incident: July 10, 2013

Number of employee fatalities: 1

Time of Incident: 3:30 PM

Description of workplace operations: Volunteer had completed the day's work and was returning to the California mainland, which is accomplished by water craft.

Description of incident: Volunteer descending a ladder from a dock into a boat lost his grip, fell, his head struck the boat, resulting in fatal injuries.

Analysis of workplace cause: No known cause. Autopsy inconclusive on possible medical event causing the loss of grip. Weather conditions not a factor.

Corrective actions taken? Yes  No

If yes, please describe: Organization is studying varying designs to on and off-board personnel from the craft to the shore.

Programmatic changes made? Yes  No

If yes, please describe: N/A

**NPS Fatality/Catastrophic Event Summary Report (2)**

Fatality    Catastrophic Event      Work related? Yes  No

Number of employees injured: 1

Date of Incident: September 19, 2013

Number of employee fatalities: 1

Time of Incident: 4:30 PM

Description of workplace operations: Heavy equipment operations in remote area of the park.

Description of incident: Employee working alone in a remote area failed to check in a pre-determined meeting location. Employees searched for a located the employee in an unconscious state. Resuscitation efforts failed.

Analysis of workplace cause: Insufficient communications is an expected cause – investigation report pending.

Corrective actions taken? Yes  No

If yes, please describe: Pending final report.

Programmatic changes made? Yes  No

If yes, please describe: Investigation pending, but programmatic changes including check in and out procedures are highly likely.

**BLM Fatality/Catastrophic Event Summary Report**

Fatality  Catastrophic Event      Work related? Yes  No

Number of employees injured  
Number of employee fatalities 1

Date of Incident: September 27, 2013  
Time of Incident: 12:30 PM

Description of workplace operations: Conducting smokejumper activity in support of Wildland fire suppression activities.

Description of incident: The employee parachuted approximately 45 miles east of Boise, Idaho, near Smith's Praire in support of Wildland fire suppression activities when his parachute canopy failed to deploy.

Analysis of workplace cause: Unknown at this time, final investigation report still pending.

Corrective actions taken? Yes  No   
Unknown at this time, final investigation report still pending.

Programmatic changes made? Yes  No   
Unknown at this time, final investigation report still pending.

## Appendix 4: Safety & Health Management System Self-evaluation

**Attribute Rating System**

Rating	Definition
0	The attribute does not exist.
1	The attribute needs major improvements.
2	The attribute needs minor improvement.
3	The attribute is highly effective.
NA*	The attribute is not applicable.

### I. HAZARD ANTICIPATION & DETECTION

1. **A comprehensive, baseline hazard survey has been conducted within the past five (5) years.**

0	1	2	3	NA
		✘		

The DOI Departmental Manual (DM) Chapter 2, *Responsibilities*; DM Chapter 6, *Inspections and Abatement*; DM Chapter 14, *Job Hazard Analysis*; DM Chapter 17, *Industrial Hygiene Program*; and DM Chapter 20, *Personal Protective Equipment* establish policy for workplace hazard surveys and action to mitigate exposure to unsafe conditions. The DOI Bureaus have appropriately trained and experienced employees conduct baseline hazard surveys, including a risk exposure assessment for hazardous chemicals. Serious hazards identified during an exposure assessment or through the DOI headquarters self-evaluation program are abated through corrective action plans. The validity of a Bureau hazard survey is assessed during each programmed evaluation, which is on a three-year cycle. Based on Bureau reporting and programmed agency headquarters evaluations, DOI reasonably concludes that comprehensive baseline surveys have been performed. Based on current reporting and programmed self-evaluations, the Department considers this attribute of the Safety and Health Management System (SHMS) to only need minor improvement.

The DOI's Safety Management Information System (SMIS) is the primary source of data used by Interior managers and professional safety and health staffs to identify trends and develop control strategies. SMIS is designed for use at any level within the DOI. An Exposure Assessment (EA) module was added to SMIS that will categorize all tasks, associated risks, and occupational exposures at a given DOI site/facility.

The OSH SMIS team is finalizing an inspection and abatement (IAS) module for Departmental use. The IAS module will be designed to provide a method of reporting and tracking safety findings, creating and recording annual inspection plans, and creating compliance and other reports within all DOI facilities. This module will be finalized and deployed in late FY 2014.

DOI launched a safety and occupational health evaluation program in FY 2011. By the end FY 2014, all DOI Bureaus will have received an evaluation. The safety and occupational health program evaluations are an assessment of a Bureau level program to verify it complies with DOI's policies and requirements, and conforms to good safety and occupational health practices. The evaluation program also identifies program successes and best practices that can be shared Department wide. Corrective action plans are requested from Bureau Directors that address the abatement of weaknesses found during the evaluation.

**2. Effective safety and health self-inspections are performed regularly.**

0	1	2	3	NA
				

The DOI DM Chapter 6, *Inspections and Abatement* establish policy for safety and health inspections and abatement action. The DOI Bureaus have appropriately trained and experienced employees conduct inspections. Serious hazards identified during an inspection are tracked and abated through internal corrective action plans. Based on Bureau reporting, DOI concludes that safety and health inspections are performed regularly.

The Department is finalizing an inspection and abatement (IAS) module for Departmental use. The IAS module will be designed to provide a method of reporting and tracking safety findings, creating and recording annual inspection plans, and creating compliance and other reports within all DOI facilities. This module will be finalized and deployed in late FY 2014. In addition, Interior uses a Risk Assessment System, which assigns a Risk Assessment Code (RAC) to an identified hazard. The RACs assist safety and health staffs and program managers in determining the extent of the risk to employees and the priority for mitigation. Based on current DOI OSH plan to implement the IAS and EA modules, the Department considers this attribute of the SHMS to only need minor improvement.

**3. Effective surveillance of established hazard controls is conducted.**

0	1	2	3	NA
				

The DOI Bureaus have appropriately trained and experienced employees regularly conduct self-inspections. Serious hazards identified during an inspection are expected to be tracked and abated through internal corrective action plans. Bureaus are responsible for the surveillance of hazard controls and based on Bureau reporting, the Department concludes that effective surveillance of established hazard controls are in place.

As stated previously, the Department is finalizing an inspection and abatement (IAS) module for Departmental use. The IAS module will be designed to provide a method of reporting and tracking safety findings, creating and recording annual inspection plans, and creating compliance and other reports within all DOI facilities. This module will be finalized and deployed in late FY 2014. In addition, Interior uses a Risk Assessment System, which assigns a Risk Assessment Code (RAC) to an identified hazard. The RACs assist safety and health staffs and program managers in determining the extent of the risk to employees and the priority for mitigation. Based on current DOI OSH plan to implement the IAS and EA modules, the Department considers this attribute of the SHMS to only need minor improvement.

**4. Change analysis is performed whenever a change in facilities, equipment, materials, or processes occurs.**

0	1	2	3	NA
		✘		

Based on Bureau reporting and Departmental policy as stated above in Item I (1), the agency has effective policies and procedures in place expected to produce detection of potential hazards, including hazardous chemicals, associated with planned or anticipated changes in the work locations. The Bureaus require a written Job Hazard Analyses (JHAs) for all high-hazard jobs and for processes where a serious injury or illness dictates the need. These JHAs establish hazard controls for safety and health, with engineering controls, safe working practices, and administrative controls as priorities, followed by the use of personal protective equipment. Local supervisors brief employees involved with their respective operation(s) on the JHA form and the respective operational controls so that all understand the hazards and controls associated with the work areas. Most control measures are met through training and/or PPE. Based on current reporting, the Department considers this attribute of the SHMS to only need minor improvement.

**5. Safety Data Sheets are used to reveal potential hazards associated with chemical products in the workplace.**

0	1	2	3	NA
		✘		

Based on Bureau reporting, Safety Data Sheets (SDS's) and other hazardous chemical references are readily used to reveal potential hazards associated with chemical products in the workplace. The detection of existing or potential hazards associated with a hazardous chemical/material is performed through established polices (DOI DM's as stated above and Bureau specific polices). The process of detecting workplace hazards associated with chemical products is part of the exposure assessment process as described above in section

I (1). The Department concludes that MSDSs for hazardous products have been obtained, and reviewed by the local level supervisor or manager, as required by policy. Consultation with a Collateral Duty Safety Officer (CDSO) or full-time Safety and Health professional is available upon request. The process of detecting workplace hazards from information found in SDSs is considered effective based on Bureau reporting. Any deficiency within a Bureau is immediately corrected or appropriately scheduled for correction within a unit’s internal corrective action plan. Furthermore, training has been provided on the “Globally Harmonized System for Hazard Communication” (GHS)” in accordance with revised OSHA requirements. The Department considers this attribute of the SHMS to only need minor improvement.

**II. HAZARD PREVENTION & CONTROL**

**6. Feasible engineering controls are in place.**

0	1	2	3	NA
			✘	

The Department identifies and employs engineering methods to eliminate or control workplace hazards. The Department employs a “*Hierarchy of Controls*” policy to control identified hazards. Interim controls are required until engineering controls are in place. When Bureaus determine the manner in which hazards are reduced or eliminated for reducing chemical exposures, it’s generally recognized that it’s 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 where needed is considered preferable to simply issuing personal protective equipment.

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.

The tracking of hazards and the corrective actions used to control or abate them is an essential component of the DOI OSH 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. The Department concludes that this attribute of the SHMS to be highly effective throughout the agency.

**7. Effective safety and health rules, and work practices are in place.**

0	1	2	3	NA
			✘	

The Department has codified, through its DM process, its occupational safety and health program. The DOI policy establishing and maintaining safe and healthful working conditions is the foundation of the OSH program. The DOI policy communicates the value placed on occupational safety and health throughout the agency and empowers management to make sound decisions affecting all safety and health matters in the workplace. The Department’s OSH polices covers all workplace conditions, operations, and employees. The Department’s expectation is that this policy is 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 DOI OSH polices are signed by the Assistant Secretary, Policy, Management and Budget, who is the DOI Designated Agency Safety and Health Official (DASHO), demonstrating that it represents senior management’s commitment to the safety and health program. Furthermore, Bureau respective OSH polices are in place congruent with agency policies. The Department concludes that this attribute of the SHMS to be highly effective throughout the agency.

**8. Applicable OSHA-mandated programs are effectively in place.**

0	1	2	3	NA
		✘		

The DOI OSH DM and Bureau policy establishes requirements for implementation of OSHA-mandated programs. Based on Bureau reporting, most OSHA-mandated programs are in place with some exceptions. Bureau self-evaluations found lack of written programs, deficiencies in employee training, and revealed that several of the OSHA written programs should be standardized for greater emphasis across the Department. Examples include lockout/tagout and confined space. The Department concludes this attribute of the SHMS to only need minor improvement.

**9. An effective procedure for tracking hazard correction is in place.**

0	1	2	3	NA
		✘		

The DOI has adopted a Risk Assessment System which is to be used by the Bureaus for determining the priority for hazard abatement activities. Hazard controls and abatement 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. The tracking of hazards and the corrective actions used to control or abate them is an essential component of the DOI OSH 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.

As stated previously, the Department is finalizing an IAS module for Departmental use. The IAS module will be designed to provide a method of reporting and tracking safety findings, creating and recording annual inspection plans, and creating compliance and other reports within all DOI facilities. This module will be finalized and deployed in late FY 2014. In addition, Interior uses a Risk Assessment System, which assigns a RAC to an identified hazard. The RACs assist safety and health staffs and program managers in determining the extent of the risk to employees and the priority for mitigation. Based on the current DOI OSH plan to implement the IAS and EA modules, the Department considers this attribute of the SHMS to only need minor improvement.

**III. PLANNING & EVALUATION**

**10. Hazard incidence data are effectively analyzed.**

0	1	2	3	NA
		✘		

The DOI analyzes hazard incidence data to enumerate hazard types, to detect time trends and spatial patterns, and to determine proportional distributions among operations and personnel. Results of the DOI analyses are utilized in determining hazard prevention strategies. Additionally, Bureaus undertake collection and formal analysis of its hazard incidence data.

Analyses are carried out both formally on a periodic basis, as well as informally on an ongoing basis to detect workplace trends that may point to underlying causes and, importantly, lead to the development of corrective and preventive actions. Where deficiencies are detected due to, for example, lapses in compliance or unclear requirements, corrections are promptly made to keep the OSH program on course. The objectives of analyses are to identify the various root causes and contributing factors so that they can be eliminated or controlled. The Department concludes this attribute of the SHMS to only need minor improvement.

**11. An action plan designed to accomplish the organizations safety and health objectives is in place.**

0	1	2	3	NA
		✘		

The DOI OSH program has a strategic plan that establishes strategies to meet the OSH objectives. Periodic reports are made which identify progress towards the objectives as well as potential impediments or setbacks. The DOI DASHO Council drives this process by reviewing periodic progress reports, assigning responsibilities to address impediments, and ensuring appropriate follow-up and oversight. Clear strategic goals have been established for the OSH program based on sound rationale and programmatic needs. These goals have been communicated to all personnel. Strategic goals, priorities and tactics for accomplishing them are reevaluated and updated as new program information becomes available. The Department reasonably concludes this attribute of the SHMS to only need minor improvement.

Based on Bureau reporting, annual safety action plans are developed throughout levels of the organization. Some Bureaus have national level plans that use leading indicators to measure goals and are reviewed annually. Others have long range and annual action plans are in place to accomplish safety and health objectives.

**12. A review of the overall safety and health management system is conducted at least annually.**

0	1	2	3	NA
		✘		

DOI launched a safety and occupational health evaluation program in FY 2011. By the end FY 2014, all DOI Bureaus will have received an evaluation. The safety and occupational health program evaluations are an assessment of a Bureau level program to verify it complies with DOI's policies and requirements, and conforms to good safety and occupational health practices. The evaluation program also identifies program successes and best practices that can be shared Department wide. Corrective action plans are requested from the Bureau Directors that address the correction of weaknesses found during the evaluation.

Based on Bureau reporting, on an annual basis, reviews of action plans and accomplishments from all levels of the organization are accomplished. The national action plan is based on the outcome of the national program management reviews and accomplishment reports from field level offices. Based on the establishment of the DOI

OSH evaluation program and Bureau specific audits and self-assessments, the Department concludes this attribute of the SHMS to only need minor improvement.

**IV. ADMINISTRATION & SUPERVISION**

**13. Safety and health program tasks are each specifically assigned to a person or position for performance or coordination.**

0	1	2	3	NA
			✘	

The DOI establishes position responsibilities in DM 2, *Responsibilities*, for the OSH program that starts with the Secretary of the Interior and further assigns responsibilities to subordinate positions to the Assistant Secretary PMB, Heads of Bureaus, and to the OSH staffs within Bureaus at the National-level on down to local unit managers. For example, DM 2 requires all accidents to be investigated and those that are considered serious in nature, by policy definition, are under the purview of the Bureau DASHO to assign a Serious Accident Investigation team to conduct a thorough investigation.

The DOI recognizes that ownership of the safety and health program lies with employees at every level of the organization, each safety and health policy explicitly enumerates tasks and specific responsibilities that the specific category of personnel must adhere to (from Director to individual employee ) in keeping our employee’s safe. For example, the supervisor is explicitly charged with performing accident investigations’ and reporting, while employees are responsible for working safe and wearing proper PPE as required. The Department concludes that this attribute of the SHMS to be highly effective throughout the agency.

**14. Individuals with assigned safety and health responsibilities have the necessary knowledge, skills, and timely information to perform their duties.**

0	1	2	3	NA
	✘			

Safety and health training, when appropriately and thoroughly integrated into the workplace, provides employees with the information they need to adequately protect themselves and others from potential harm while performing their work assignments. Personnel who have special safety and occupational health responsibilities require a higher level of training. Based on Bureau reporting, safety committee members and CDSOs are, for the most part, able to address some concerns beyond the immediate scope of their normal work activities and as well as be moderately familiar with the organization’s OSH policies and procedures.

The requirements contained within the DOI “Safety and Health Training, Technical Skills and Abilities for Collateral Duty and Full Time Safety Personnel Handbook” are mandated by policy for collateral and full-time safety and health staff. With some exceptions, most individuals with assigned safety and health responsibilities have the necessary knowledge, skills, and timely information to perform their duties. The Department concludes that this attribute of the SHMS needs major improvement.

**15. Individuals with assigned safety and health responsibilities have the authority to perform their duties.**

0	1	2	3	NA
		✘		

Safety and health program responsibilities are assigned to individuals, and those assignments have been clearly communicated. Most individuals with assigned safety and health program responsibilities have the authority needed to accomplish assigned tasks. Control over activities in the workplace remains with the local supervisor or manager who may or may not have safety or health program responsibilities. For supervisors or managers who do not have safety or health program responsibilities, full time or collateral duty safety assistance is available. The Department concludes that this attribute of the SHMS needs only minor improvement.

**16. Individuals with assigned safety and health responsibilities have the resources to perform their duties.**

0	1	2	3	NA
	✘			

DOI is operating in an environment of constrained resources across all its program areas. Available resources are prioritized based upon the most critical health and safety needs. DOI and Bureau level managers support effective operation of the safety and health program by allocating available resources based on needs; realistically though, agency resources are finite and due to budget constraints many program budgets are seeing reductions. The Department concludes that this attribute of the DOI SHMS needs major improvement.

**17. Organizational policies promote the performance of safety and health responsibilities.**

0	1	2	3	NA
		✘		

The DOI polices promote the performance of safety and health responsibilities. Based on reporting, this attribute of the DOI SHMS needs only minor improvement.

The USGS has promoted safety and health performance via the establishment of the twenty-four safety and health performance metrics within the organization. These metrics are tracked, with their final performance conveyed to all employees via the annual report.

**V. SAFETY & HEALTH TRAINING**

**18. Employees receive appropriate safety and health training (including those overseas).**

0	1	2	3	NA
		✘		

The DOI and Bureaus have established an organized safety and health training effort that identifies training needs, determines the method to meet those needs, assures delivery of the training in a timely manner, and evaluates the effectiveness of the training provided. These training sessions are provided to ensure that employees have the necessary knowledge and skill to perform their assigned safety and health responsibilities.

The requirements contained within the DOI “Safety and Health Training, Technical Skills and Abilities for Collateral Duty and Full Time Safety Personnel Handbook” are mandated by policy for collateral, full-time safety and health staff, and also contains mandatory training requirements for supervisors as well as for all employees. The depth and breadth of ongoing worker training, and the circumstances that prompt such training is considered by the Department as proactive. Based on reporting, this attribute of the DOI SHMS needs only minor improvement.

**19. New employee orientation includes applicable safety and health information.**

0	1	2	3	NA
		✘		

All DOI employees are made aware of OSH standards that apply to them via mandated DOI LEARN orientation courses (accessed via DOI LEARN), supplemented with local supervisor safety orientation that is location, job, and activity specific. The Bureaus provide appropriate education and training in safety and health protection for new employees who are assuming new duties. Standardized on-line new employee orientation training incorporates safety and health information with local units also incorporating safety orientations or providing employees with orientation materials for reading/viewing.

Minimally, the new employee safety and health orientation training covers the safety and health policy of the respective Bureau or office, general safety and health rules, major

hazards and protections of the expected work environment, and emergency procedures. When employees change job duties and this change involves significant new hazards, protections, or emergency procedures, the Department expects that reorientation training occurs. Based on reporting, this attribute of the DOI SHMS needs only minor improvement.

**20. Supervisors receive training that covers the supervisory aspects of their safety and health responsibilities.**

0	1	2	3	NA
		✘		

The Department and Bureaus provide supervisory training that addresses the supervisor’s safety and health management responsibilities. Supervisors have job-related knowledge of hazards, protections, and emergency procedures, to properly train and motivate their subordinates to recognize the hazards, use protective measures, and follow emergency procedures. Supervisory skills can be improved through coaching or other specialized training so as to acquire the necessary managerial skills to motivate safe work practices. Standardized safety training for supervisors is available on-line; but there is no methodology to ensure that supervisors have received this training.

**VI. MANAGEMENT LEADERSHIP**

**21. Top management provides competent safety and health staff support to line managers and supervisors.**

0	1	2	3	NA
		✘		

Throughout the DOI, competent safety and health staff are in place to support line managers and supervisors in meeting their safety and health responsibilities. This staff support encompasses a wide range of activities and assistance. The exact nature of the staff support provided fits the particular needs and circumstances of each Bureau throughout the Department. Based on reporting, this attribute of the DOI SHMS needs only minor improvement.

**22. Managers delegate the authority necessary for personnel to carry out their assigned safety and health responsibilities effectively.**

0	1	2	3	NA
			✘	

The DOI and Bureau OSH Program policies create the authority and responsibility necessary for personnel to carry out their assigned safety and health responsibilities effectively while furthering support of the SHMS. This attribute of the DOI SHMS is considered to be highly effective throughout the agency.

Some bureaus appoint CDSOs in writing and provide them with the authority to carry out their assigned duties. Employee interviews during program reviews indicate that managers are generally supportive of the safety and occupational health program in their offices.

**23. Managers allocate the resources needed to properly support the organizations safety and health management system.**

0	1	2	3	NA
	✘			

Interior is operating in an environment of constrained resources. Resources are prioritized based upon the most critical health and safety issues. The DOI and Bureau managers attempt to support effective operation of the safety and health management system by allocating needed resources; realistically though, agency resources are finite and due to budget constraints many program budgets have been reduced. The Department concludes that this attribute of the DOI SHMS needs major improvement.

**VII. EMPLOYEE PARTICIPATION**

**24. There is an effective process to involve employees in safety and health issues.**

0	1	2	3	NA
		✘		

Through DOI and Bureau OSH polices, an effective process to involve employees in safety and health issues has been developed. These processes are known, trusted, and used by employees to provide input regarding safety and health issues. These processes involve the solicitation, receipt, and acknowledgement of employee input. Various methods have been developed throughout the agency to engage employees where safety and health issues are discussed. The Department concludes that this attribute of the DOI SHMS needs only minor improvement.

**25. Employees participate in the evaluation of safety and health performance.**

0	1	2	3	NA
		✘		

Overall, employees participate in the evaluation of safety and health performance throughout a variety of Departmental and Bureau methods. Evaluations and surveys reveal that most managers and supervisors are able to identify the safety and health activities undertaken by the organization, and are able to describe how employees participate in those activities. The Department concludes that this attribute of the DOI SHMS needs only minor improvement.