



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240

April 22, 2015

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 Calendar Year 2014 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 CY 2014. These accomplishments are highlighted in the accompanying Annual Report and plans are in place for further improvements in CY 2015. The report contains all requested information on the Department's Occupational Safety and Health Programs leadership, 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.

Sincerely,

Mary F. Pletcher  
Deputy Assistant Secretary Human Capital and Diversity  
Departmental 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**

**Stewart Lee Udall Building**

**Washington, DC 20240**

**May 2015**

# CY 2014 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  
Stewart Lee Udall Building  
Washington, D.C. 20240**

Number of Federal civilian employees this report covers: **70,000**

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 Reclamation and Enforcement (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>
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<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.*

1) 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/office policies require employees to wear seat belts and not use cell phones or 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. .

Interior policy requires Federal employees who regularly operate a Government, rental, or privately owned motor vehicle 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 with regulations administered by the Federal Highway Administration and the States wherein the children are transported.

Defensive driver training courses and new/seasonal employee orientations stress safe motor vehicle operations and the use of occupant restraints for all vehicle occupants. Additionally, field offices typically raise motor vehicle safety awareness, distracted driving, aggressive driving and seat belt usage, during their annual safety week training and have asked local law enforcement offices to assist.

During calendar year 2014, the Department of the Interior (DOI) recorded 581 motor vehicle accidents. All these accidents were investigated to determine causes, seat belt usage, operator training, and distracted driving factors. Many of these accidents involved backing into objects, being struck from behind, striking nearby objects, and striking animals.

2) 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 2014 DOI Total Case Rate (TCR) and Lost Time Case Rate (LTCR) goals of 5.13 and 1.67 were met. 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 (<http://www.dol.gov/owcp/dfec/power/>)

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<b>DOI POWER Goals</b>	<b>FY 2009 Baseline</b>	<b>FY 2014 Target</b>	<b>FY 2014 Actual</b>
Reduce Total Case Rate	6.43	5.13	5.08
Reduce Lost Time Case Rate	2.21	1.67	1.67

Interior experienced 2,591 employee injury and illness recordable cases in CY 2014. Twenty-five percent of all injury and illness cases were due to exertion and twenty-two percent were due to slips, trips, and falls.

### *b. Illnesses, Injuries, Fatalities & Catastrophic Events.*

Improper material handling, lack of training, and an employee's level of physical fitness are common factors identified in accompanying accident reports. Largely because of this finding, DOI has taken a variety of steps to address these issues. Some agency-wide steps include: discussions at leadership team meetings, employee reminders during inclement weather conditions, and emphasis on employee walking safety through awareness training, presentations and discussions. Bureau/office actions include conducting more thorough risk assessments to address the use of appropriate footwear while working outdoors, addressing work on hazardous terrain, and ensuring work rest cycles have been incorporated where appropriate. During inclement weather conditions, some bureaus took additional steps that included placing signage at exit doors to warn of outdoor icy conditions, placing safety cones at entry/exit doors during wet conditions, purchasing employee traction devices, and modifying and/or enforcing snow removal contracts to clear walkways and parking areas early to minimize employee exposure.

One example in particular is the National Park Service (NPS). Injuries due to excessive exertion was identified as a top employee injury, so they established a national Wellness Program and are currently developing policy and guidance to promote employee health and fitness nationwide. This voluntary program includes information on wellness activities and provides operating units with suggestions for implementing and managing effective programs for managing exertion-related injuries. During 2014, the NPS also re-established a National Safety, Health, and Wellness Awareness Day to encourage field managers to evaluate common hazards/injuries, develop training, and implement other risk reduction measures. Many of these actions have focused on reducing musculoskeletal injuries. Best practices from this effort have been shared across NPS. Finally, their national ergonomics program policies are being revised to provide improved field guidance

Overall, DOI continues its efforts in reducing the number of employee injuries and illnesses. Bureaus/Offices use all-employee presentations, pre-field season safety presentations, new employee orientations, field safety messaging, as well as other media campaigns to increase awareness and to stress prevention of common types of injuries/illnesses.

Fatalities & Catastrophic Events.

There were two work-related fatalities in CY 2014. The bureaus that had a fatality were: BLM – one fatality; and BOR – one fatality. Please see the summary of fatalities & catastrophic events, in Appendix 2, for further summation of each event.

*c. 29 CFR 1960 Requirements.*

Organization of Agency Safety and Health Mission.

In DOI, the Office of Occupational Safety and Health (OSH) is responsible for advising and supporting the DOI Designated Agency Safety and Health Official (DASHO) who exercises the authority of the Secretary of the Interior for the management and administration of the Occupational Safety and Health Program (Program). The DASHO also provides the management direction and support necessary to effectively fulfill DOI's policy commitments. The DASHO ensures that appropriate Departmental resources (staff and budget) are allocated at the agency level to effectively implement and administer the Program. The OSH develops the Program policies, procedures, directives, standards, objectives, handbooks, and guidelines for the Department-wide Program that ensure compliance with legal, regulatory, and policy requirements to reduce risk and liabilities.

In general, DOI-wide, safety and health staffs have the authority to work with managers to abate or control hazards, which is frequently contingent on available funding. There are some bureau safety staff offices with small budgets and some that do not have dedicated funding, but despite the lack of a budget, the bureaus/offices generally provide adequate resources to abate unsafe or unhealthful conditions, purchase safety supplies and personal protective equipment, and provide for training as necessary. Notices of unsafe/unhealthful working conditions are used infrequently and managers generally ensure abatement of unsafe/unhealthful working conditions when they are notified.

Field Federal Safety & Health Councils.

Members of OSH attend the Federal Advisory Council on Occupational Safety and Health (FACOSH) on the DASHO's behalf. These staff members attend FACOSH meetings and support other Council activities when possible. Employees in DOI's regional offices, which are most likely to be located in urban centers, are encouraged to be active participants in the Field Federal Safety and Health Councils. Due to the remoteness of many DOI's sites, DOI has not focused on participation in the activities of Field Federal Safety and Health Councils outside of urban centers. DOI does encourage 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.

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### Inspection of the Safety & Health Management System.

The DOI OSH conducts internal safety and health program evaluations of the bureaus/offices. In CY 2014, the DOI OSH, with contract support from Federal Occupational Health, conducted safety and health program evaluations of U.S. Geological Survey (USGS), Bureau of Indian Affairs (BIA) and Bureau of Indian Education (BIE). All of the 2014 OSH program evaluations were announced, including the site visits.

In addition, the Department of Labor's (DOL) Occupational Safety and Health Administration (OSHA) also conducted inspections of DOI organizations located throughout the nation. Notices of Unsafe and Unhealthy Working Conditions from OSHA, received at the agency level, were sent to the appropriate bureau/office national office for corrective action. Internally the bureau/office coordinated with their respective regional office for closure. In the past, there have been instances where Notices of Unsafe and Unhealthy Working Conditions were issued by an OSHA area office, and went unabated without the knowledge of OSH or the bureau/offices' National Office. It would be advantageous for OSHA area offices to submit a second copy of all Notices of Unsafe and Unhealthy Working Conditions directly to the respective bureau/offices' National Office for coordination of tracking and abatement. Keeping the bureau/offices' National Office abreast of these notices would potentially decrease the likelihood of a "failure to abate" and would improve the timeliness of information sharing.

### *Specific Bureau/Office Activities:*

The Bureau of Land Management (BLM) conducted internal and external program management audits and facility inspections in CY 2014. External inspections included those conducted by OSHA and those conducted by a third party contractor as part of their Compliance Assessment Safety Health Environment (CASHE) Program. Approximately 180 inspections of all types were conducted at BLM facilities, with 25 of those inspections being unannounced. OSHA inspections occurred in several offices and 22 Notices of Unsafe or Unhealthy Working Conditions were issued. Abatement actions at BLM are tracked until completion.

The Bureau of Reclamation (BOR) conducted internal assessments of its safety and health management system (SHMS) through their Safety Management Evaluation program (SME) along with focused audits (FA) when warranted. In CY 2014, SMEs were conducted in the Pacific Northwest and Lower Colorado regions, while FAs were conducted in Mid-Pacific, Great Plains, and Upper Colorado regions. BOR also had three OSHA inspections during this reporting period. One was a scheduled follow up inspection which resulted in no notices issued. Two of the inspections were triggered by employee complaints, and each resulted in notices issued.

The Fish and Wildlife Service (FWS) conducted internal safety and health inspections of its SHMS through its ongoing regional safety evaluation program, where at least two regions per year are assessed. FWS regional offices also perform safety evaluations of their subordinate duty stations, and each year, the duty stations perform their own internal

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safety inspections and evaluations. Field reporting indicated that the FWS received six OSHA inspections in CY 2014. Notices of Unsafe and Unhealthy Working Conditions were addressed and issues abated at the local and region levels.

The Indian Affairs (IA) Division of Safety and Risk Management (DSRM) conducted Safety and Health Program Evaluations at five regions in CY 2014. The evaluations were conducted at the Midwest Region, Pacific Region, Alaska Region, Navajo Region, and Southwest Region, and included Bureau of Indian Affairs, Bureau of Indian Education, and Office of Justice Services operations. Regional and DSRM safety managers conducted 238 annual safety and health facilities inspections and OSHA inspected the Colville Agency in Nespelem, Washington. All 238 Regional and Headquarters level annual inspections and the OSHA inspection were unannounced. All IA inspections were entered and finalized in their automated Facilities Management Information System, which generates a Notice of Unsafe or Unhealthy Working Conditions Report for each inspection.

Because of its many scenic locations, the National Park Service (NPS) is routinely inspected by federal, state and local regulatory agencies which included 12 unannounced OSHA inspections. Park units fully cooperate with OSHA's compliance officers and ensured prompt responses were provided to the appropriate OSHA area office within the due date(s) listed on any notice(s) received. Notices were posted as required and all affected employees were informed of inspection results and corrective actions. Hazard abatement documentation was provided to OSHA and all corrective actions were tracked. Finally, a summary of the inspection, identified hazards, and corrective actions were shared with other operating units to ensure that similar hazards that could exist elsewhere are identified and corrected. The NPS did not appeal any OSHA issued Notices of Violation during CY 2014.

The United States Geological Survey (USGS) has been conducting and documenting internal SHMS audits using the ANSI Z.10 best practices and DOI Program Evaluation Guidebook criteria since FY 2010. The USGS received three OSHA inspection(s) during CY 2014, all from OSHA's Region 9 Office. There were 6 total Notices of Unsafe or Unhealthy Working Conditions identified, and most of the conditions were abated prior to final report issuance. The USGS uploads all OSHA inspections internally within the Inspection and Abatement System (IAS) which then tracks and documents abatement of findings and corrective action(s) in the same fashion as if the condition were identified via internal audit.

### Occupational Safety and Health Training.

Interior's DOI University hosts a comprehensive safety and health training catalog that encompass all levels of employee participation in the Program, and meets the basic elements of 29 CFR Part 1960, Subpart H for required training and learning experiences. These training sources are in line with the Department of Labor's "Occupational Safety and Health Training Guidelines for Federal Agencies" published in 2014.

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### *Specific Bureau/Office Activities:*

In BLM, employee training was delivered through hands-on and classroom instructor-led training, and through various on-line training programs. Practical exercises and demonstrations of skill, exams, surveys, and instructor evaluations were used to determine the effectiveness of the training and to assess competency/skill levels of students. To reduce training costs, many classes were conducted by instructors developed through train-the-trainer programs.

The USGS OSH Management Branch has been partnering with the Interior Business Center/DOI University since FY 2003, resulting in a host of web-based safety and health training to facilitate field compliance with OSHA training requirements. The USGS also creates its own online safety and health courses using DOI University. Their most recently published course was radiation safety, which was developed to meet Nuclear Regulatory Commission (NRC) training requirements for employees using instruments with a nuclear source. USGS training meets the guidelines in the “*Occupational Safety and Health Training Guidelines for Federal Agencies*.”

All training developed by the FWS Division of Safety and Health meets the requirements of 29 CFR Part 1960 and E.O. 12196. The FWS does not follow the “*Occupational Safety and Health Training Guidelines for Federal Agencies*” for training guidance, but meets the actual Code of Federal Regulations and Executive Orders that pertain to federal agencies and employee safety.

The NPS is currently evaluating OSHA’s training guidelines to determine if these guidelines will be incorporated into the updated version of NPS Reference Manual 50B, Occupational Safety and Health Program which is currently under revision. The NPS Office of Risk Management is also in the initial stages of developing a computer-based system to track training courses, costs and, when appropriate, test results. Methods and measures to assess training outcomes are being developed by NPS. At present, NPS does not have system to determine funds allocated for OSH-related training.

In CY 2014, the Department had employees stationed in overseas locations. Each individual bureau/office is responsible for assuring safety and health programs for their overseas employees are implemented and congruent with federal 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.

Interior’s online training system, *DOI Learn*, is used to provide the preponderance of its safety training to its employees, including those located in overseas locations. Additionally, during Calendar Year 2014, 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.

At DOI, Whistleblower Protection is provided through the Office of Inspector General (OIG) which relies on whistleblowers to accomplish its statutory mission to detect and prevent fraud, waste, mismanagement and violation of law, rule or regulation. The OIG has been conducting Whistleblower Protection Program (WBPP) investigations since 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 taught their rights and managers are instructed 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 whistleblower reprisal investigations. As a predicate to an OIG investigation, and if appropriate to the facts, the OIG may advise senior level DOI officials of complaints so they can promptly intervene. The OIG monitors these referrals to assure management has responded appropriately.

The OIG advocates and communicates regularly with individual whistleblowers 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 if requested, to include further investigation.

Product Safety.

DOI ensures that products and services that it has procured for use comply with product safety requirements, including those listed on the safety data sheets (SDS), and on product recalls when necessary. Products and services purchased by the bureaus/office have certifications that the product has passed performance tests, quality assurance tests, meets qualification criteria stipulated in contracts, regulations, or other specifications. Product recalls are shared through program channels and through bureau/office safety managers. When recalls affect motor vehicles, or any products in use, DOI removes these items from service until repairs are completed. Bureaus/Offices utilize different approaches regarding Safety Data Sheets (SDS). BOR, for example, employs a web based commercial product called "MSDSOnline" to receive updates on chemical inventories, and to ensure SDS' are up to date and correct. On the other hand, SDSs in BLM are used to evaluate and select chemical products when a selection of products is available for purchase.

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 70,000 employees and 300,000 volunteers. Interior currently has 2,127 establishments throughout the nation, including remote field offices that do not have the staffing to support full-time safety and health positions. DOI utilizes approximately 1,200 Collateral Duty Safety Officers (CDSO) who play a critical role in the Department’s SOH program. Both full-time safety professionals and the CDSOs work at all levels within DOI’s bureaus/office to assure program compliance and integration of safe and healthful practices throughout a wide range of complex activities. Lastly, DOI is operating in an environment of constrained resources, so issues are prioritized based upon the most critical health and safety needs.

Identifying and controlling accident and incident trends is an ongoing effort. DOI’s Safety Management Information System (SMIS) is the primary source for information used by managers and 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 accident reports and the Office of Worker’s Compensation Program injury and illness forms. SMIS can also generate reports for any DOI organization or combination of organizations.

One of SMIS uses is to identify facilities with high injury and illness rates. Managers and safety and health professionals use the application’s unique reporting features to analyze

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accident case histories and injury and illness rates at facilities within the bureaus/office to identify specific trends and major causes of incidents.

An Exposure Assessment (EA) module has been added to SMIS to allow the bureaus/office to 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 is designed to provide a method of reporting and tracking safety findings, creating and recording annual inspection plans, creating compliance and other reports for DOI facilities. The SMIS Working Group is exploring the capability of the SMIS application to communicate with other legacy systems and share data.

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.

At the end of CY 2014, all DOI bureaus had received a baseline 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.

### III. 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
- Enable SMIS to communicate with ecomp for filing forms and sharing data electronically

#### 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

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- Indefinite delivery/Indefinite quantity Medical Surveillance and update pre-employment qualifications
- Develop a life safety standardized assessment tool; start assessment process
- Improve record keeping through the Dam Safety Information System

### b. FWS

- Conduct a face-to-face Regional Safety Managers meeting
- Conduct safety and health program evaluations of Regions 2 and 7
- Initiate development of a service-specific Collateral Duty Safety Officers course
- Continue development of service-specific on-line 8-hour Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) refresher course
- Revise policy Manual Chapter 241 FW 8, Energy Lock Out / Tag Out; Develop new policy 241 FW 4, Risk Management
- Hire a full-time Workers' Compensation Program Manager

### c. IA

- Continue three year follow-up of Safety and Occupational Health Program Evaluations in the regions
- Establish safety committee's at all IA locations within with more than fifteen employees
- Establish Collateral Duty Safety Officers (CDSO's) at all IA 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 courses
- Develop safety and occupational health webinars
- Implement Safety and Health SharePoint website

### d. NPS

- Continue developing a National Safety, Health and Wellness Strategy to assist with positive culture change toward safety, occupational health, and wellness. The strategy includes three goals to improve the following: Communications, Capacity, and Systems.
- Continue 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 405 park areas
- Continue implementing its behavior-based safety program, Operational Leadership, which has directly contributed in a 33% reduction in recordable injuries over the past five years

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### e. USGS

- Continue to measure internal performance metrics
- Annually conduct program planning to focus bureau resources on program gaps and deficiencies with an emphasis on continual improvement

### f. BLM

- Improve the effectiveness of the BLM's safety and health management system by reducing hazard exposures through recognition and prevention programs such as risk management training, an update to the off-highway vehicle policy, radiation exposure prevention training, a new confined space entry policy, and benzene awareness training
- Ensure safety and occupational health training is integral to the education and development of all employees and supervisors
- Increase competency levels of safety and health professionals will be accomplished through access to Skillsoft on-line training, release of an on-line respiratory protection program, and professional development activities at annual meetings
- Develop communication plans that reach all levels within the organization using multiple channels – such as a director's letter, website updates, a monthly newsletter, an annual celebration of DOI Safety Week, and including safety and health information during new employee orientations
- Continually strive for improvement in the Bureau's safety and occupational health program through use of compliance reviews, abatement tracking, facility inspections, and quarterly analysis of injury and illness statistics provided to managers

### g. BSEE & BOEM

- Continue to focus on deficiencies and gaps identified in the DOI's Safety Program Evaluation Report as a guideline for improving the effectiveness of the Bureau's SHMS for FY2015 and beyond

## Appendix I—Subagency OSH Contacts

### **Bureau of Land Management**

Ann Krake, Acting Chief, Division of Safety, Health and Emergency Management  
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### **Bureau of Ocean Energy Management and Bureau of Safety and Environmental Enforcement**

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### **Bureau of Reclamation**

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### **Fish and Wildlife Service**

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### **Indian Affairs**

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Albuquerque, NM 87104  
505-563-5360; fax 505-563-5363; paulholley@bia.gov

### **National Park Service**

Michael May, Chief, Office of Risk Management  
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Washington, DC 20005  
202-513-7222; fax 202-371-2226; michael\_may@nps.gov

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

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## **Appendix I—Subagency OSH Contacts**

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

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Washington D.C. 20240-0001

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**APPENDIX 2 – CY 2014 BUREAU FATALITIES & CATASTROPHIC EVENTS SUMMARY REPORT**

**BUREAU FATALITIES & CATASTROPHIC EVENTS SUMMARY REPORT FOR CY 2014**

*Total number of fatalities: 2      Total number of catastrophic events: 0*

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

Fatality    Catastrophic Event      Work related? Yes  No

Number of employees injured:  
Number of employee fatalities: 1

Date of Incident: September 18, 2014  
Time of Incident: 5:45 PM

Description of workplace operations: On September 18, 2014, a BOR employee was returning to his duty station in Collbran, Colorado, after attending a two-day training class in Montrose, Colorado.

Description of incident: The employee was in official travel status and was driving his privately owned 2014 Harley Davidson motorcycle at the time of the accident. At approximately 5:45 p.m., the single motor vehicle accident occurred where the employee separated from the motorcycle and sustained multiple injuries when contacting the roadway, resulting in fatal injuries.

Analysis of workplace cause: It was determined that the most probable cause was that employee tried to avoid hitting an animal and lost control of the motorcycle.

Corrective actions taken? Yes  No

If yes, please describe: A serious accident investigation team investigated the accident. An accident abstract was developed and distributed throughout the bureau.

Programmatic changes made? Yes  No

If yes, please describe: A regional policy letter on PPE was released to clarify the use of helmets when motorcycles are used by employees on official government travel. Specifically, employees who elect to utilize a POV-motorcycle for official Government travel will comply with National Highway Traffic Safety Administration Guidelines for PPE contained in Motorcycle Safety DOT HS 807 709 rev. December 2007. At minimum, protective ensembles will include an appropriate helmet, eye protection, jackets, trousers and footwear. As a personally-owned vehicle, the protective ensemble provides protection from hazards that are not unique to the work environment.

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

Fatality    Catastrophic Event      Work related? Yes  No

Number of employees injured  
Number of employee fatalities: 1

Date of Incident: November 4, 2014  
Time of Incident: 11:45 AM

Description of workplace operations: Conducting timber appraisals in an active timber felling environment.

Description of incident: A timber cruiser/appraiser died when a tree fell on the government vehicle the employee was operating. Contract timber operations were occurring in the vicinity of the road where the employee was driving. A tree being felled by a contractor fell in an unintended direction and landed on

**APPENDIX 2 – CY 2014 BUREAU FATALITIES & CATASTROPHIC EVENTS SUMMARY REPORT**

the vehicle. The employee died at the accident site from injuries sustained from the tree impact on the vehicle.

Analysis of workplace cause: The road was not marked as being closed and no flagger was present for the felling operations to prevent driving on the road.

Corrective actions taken? Yes  No

A directive regarding “Safety and Contractual Responsibility Reminder for BLM Timber Sale Contract Purchasers” and a safety message for BLM employees was issued by the BLM Oregon State Director.

Programmatic changes made? Yes  No

In conjunction with OR State OSHA, training is planned for employees who work in the vicinity of active timber felling operations. Training will cover recognition/ mitigation/reporting of unsafe practices by a contractor, and a review of contract safety and health stipulations. A pre-work meeting checklist and an electronic inspection checklist are planned for development. Risk assessments will be updated.

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 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 OSH SMIS team is finalizing an inspection and abatement (IAS) module for Departmental use. The IAS module is 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 is undergoing bureau configuration and should be fully implemented by late CY 2015.

DOI launched a safety and occupational health evaluation program in FY 2011. At the conclusion of 2014, all DOI Bureaus had received a baseline evaluation. This safety and occupational health program evaluation is 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 reasonably concludes that safety and health inspections are performed regularly.

The Department finalized an IAS module for Departmental use. The IAS module is 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. 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. 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.

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

0	1	2	3	NA
		✘		

Based on 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 employ requirements to produce 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. 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 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 in section I (1). Based on Bureau reporting, the Department concludes that SDSs 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. 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, the 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.

**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 cover all workplace conditions, operations, and employees. The Department expects 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 demonstrating that it represents senior management's commitment to the safety and health program. Furthermore, Bureau 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 reporting, most OSHA-mandated programs are in place with some exceptions. Some 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. 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 concludes this attribute of the SHMS to only need minor improvement.

Based on reporting, annual safety action plans are developed throughout levels of the organization. Within BLM, State and national level plans are reviewed annually at the national level. A standardized format using leading indicators to measure goals has been implemented across the BLM. BLM Districts tier their action plans from plans developed at the state level. Within FWS, long range and annual action plans are in place to accomplish the FWS’s safety and health objectives. These plans are continually consulted to ensure focus and achievement of goals. IA has action plans in place at both the national and regional levels. Quarterly status updates revealed some goals and objectives have been completed. Lastly, the USGS conducts annual safety and health program planning for the purposes of: identifying existing program strengths and weaknesses based on existing program metrics; developing initiatives corresponding to identified organizational weaknesses, targeting program improvement, and abatement of facility deficiencies; ensuring effective management of program resources and personnel; focusing on field support and customer service with coordinated Bureau, regional, and science program efforts; establishing long-term vision/direction; facilitating communication and increasing

field understanding, involvement, and implementation; reducing program deficiencies and duplication of efforts; and focusing on prevention of high-hazard/high-frequency accidents.

**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. At the end of CY 2014, all DOI Bureaus had received a baseline evaluation. These 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, 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. Additionally, the USGS supplements their annual evaluation with program responsibility self-assessments conducted by their Executive Leadership Team management and respective safety managers. 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
	✘			

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.

However, for example, IA reports that of the ten full-time regional safety manager positions, seven of the regions are considered to lack the necessary comprehensive knowledge and skills needed to be successful at the regional level. Also within IA a majority of CDSO’s at the agency level also lack required training.

**Conversely**, USGS management funded OSHA Educational Training Center courses to facilitate full-time staff meeting all elements within their six year training plan.

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 Department reasonably 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
		✘		

Ideally throughout DOI, safety and health program responsibilities and/or tasks are assigned to a person or position for performance/coordination and have been clearly communicated upon assignment. Furthermore, the person or position assigned the responsibility often has the necessary authority to perform the assignment but not necessarily over resources or with line authority.

The authority over the work, authority over needed resources, and authority over subordinates is all dependent upon the position. Often, the authority over the work doesn't necessarily mean that this person or position can make and implement operational decisions relative to the assigned task, including work stoppage if necessary unless egregious unsafe conditions are observed. The authority over resources, more often than not, rests with a senior manager whom has the authority to request those resources.

If resources are not available, the responsible person may have the authority to make operational decisions that react to or compensate for the resource deficiency. The authority over subordinates rests with responsible persons who are able to make and enforce task-related assignments to others. Within DOI, all three types of authority are usually inherent to a line position, but are not often associated with safety and health as being a line function.

Within IA, all regional safety managers, acting safety managers, and CDSO's have the full support of their respective management and have full authority to carry out the safety and health program goals and objectives. At the agency levels, some locations provide full authority to the CDSOs, while others do not; the lack of effective communication regarding authority to field personnel may be a contributing factor.

In FWS, through plain language safety and health policies, safety and health program tasks are each assigned to a person or position for performance or coordination and these responsibilities are clearly communicated through policies, training, e-mails, newsletters, and safety and health committee meetings. Each bureau safety and health policy explicitly enumerates unambiguous tasks and responsibilities that the specific category of personnel (from Director to individual employee) must adhere to in keeping employees safe. Policies clearly outline who has authority over the work, resources, and subordinates.

Conversely, USGS Management have not only provided adequate personnel and financial resources to support the OSH function, but have also delegated authority for program responsibilities across the organization to not only full time and collateral duty safety professionals to adequately provide support, but for local supervision to exercise their line management responsibility for program implementation. The USGS program is the

exception rather than the relative norm. 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
	✘			

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

**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.

Within BLM, many field offices and state offices develop management safety policy to promote safety and occupational health practices. Local policies are reviewed during program management evaluations to ensure they are applicable, feasible, and that they reflect current national policy.

Because FWS policies are clearly written and effectively communicated across the organization, FWS employees: actively participate in safety and health activities such as inspections and safety committees; follow safety rules such as using required PPE for specific tasks, and report hazards. Recognizing that the ownership of the safety and health program lies with employees at every level of the organization, each safety and health policy explicitly enumerates unambiguous tasks and responsibilities that the specific category of personnel (from Director to individual employee ) must adhere to in keeping people safe.

**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.

In BLM there is a standardized checklist available to assist with safety and occupational topics for review during employee/volunteer orientations. In addition, BLM recently released a national policy to provide guidelines for conducting new employee orientation in all offices.

Within FWS, rigorous annual evaluations of the Service’s safety and health program revealed that new employee safety and health orientation needs more emphasis and uniformity. To begin improving this issue, Service policy 240 FW 3, *Safety and Health*

*Training*, was updated in August 2012 to clarify timelines and minimum requirements for new employee safety and health orientations.

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. The Department considers this attribute of the DOI SHMS to need only minor improvement.

Standardized safety training for supervisors is available on-line; but there is no methodology to ensure that supervisors have received this training. In BLM, additional safety and health material will be incorporated into the on-line DOI Supervisory Skills Workshop training to provide supervisors with basic instructions on their roles and responsibilities. Additionally, a national webinar was provided for all supervisors to attend in January 2013 as an introduction to their OSH roles and responsibilities.

The USGS is a major stakeholder with Interior Business Center in development of online safety training to facilitate the execution of mandated executive, supervisory, employee and collateral duty orientation training. Supervisors are also provided a safety program overview in the Human Resource-sponsored Leadership and Supervisory Training. The USGS also mandated the DOI Safety and Health Course for Executives for not only Senior Executive Service members but also for General Schedule Grade 14/15 employees.

VI. MANAGEMENT LEADERSHIP

21. **Top management policy establishes clear priority for safety and health.**

0	1	2	3	NA
		✘		

In accordance with DOI Departmental Manual Chapter 1, the Department is to provide safe and healthful workplaces for all employees and volunteers. This policy imposes that each Department bureau and office comply with safety and occupational health standards issued under Section 6 of the Occupational Safety and Health Act, applicable national consensus standards, approved alternate standards, and other Federal standards which affect the conduct of occupational health and safety program activities within the Department.

Within BLM, a comprehensive national policy for safety and occupational health programs was updated and released in 2014. In accordance with BLM procedures, the policy was released through the DASHO. The Deputy Director frequently endorses safety policies and procedures when speaking with employees and managers. Additionally, most state directors and district managers have developed a management safety policy to promote safety and occupational health practices within their areas of responsibility.

In BOR, top management has established safety and health as a priority in several ways. From a policy standpoint, Reclamation’s Safety and Occupational Health (SOH) Program is established in SAF P01 (<http://www.usbr.gov/recman/saf/saf-p01.pdf>). This overall SOH Policy clearly establishes the delegation of Safety authority at all levels of the organization. Reclamation has also responded to the DOI Safety and Occupational Health Program Evaluation of its SOH Program by creating 21 Safety Action Plan (SAP) teams, all tasked with addressing items linked to findings/recommendations from the DOI evaluation. All 21 SAP teams have an executive sponsor at the Regional Director level, and participation in the teams has been communicated as a top priority by upper management in all regions.

Within the FWS, top management policy establishes clear priority for safety and health and assures funding is available for safety and occupational health programs and training. The Director reviews and signs all bureau safety policies and safety initiatives.

In USGS, the focus, as illustrated by the Director’s Safety Policy Memorandum, issued in FY 2010, and follow-up message to all USGS employees, is that safety is everyone’s responsibility. Although USGS policy clearly details line management’s role for program implementation, accountability is further established via performance metrics related to accident, inspection and training data, which are conveyed to line management to address program gaps and improvements. The USGS is the only DOI bureau that has established this level of accountability within the OSH Program.

In IA, management support for the safety and health program has improved. A memorandum to all employees regarding safety and health priorities to be distributed IA-wide is awaiting signature from the Director – Bureau of Indian Affairs; Director – Bureau of Indian Education; and the Assistant Secretary Indian Affairs.

Lastly, OSM’s policy is to effectively manage the Safety and Occupational Health Program and to ensure that appropriate resources are devoted to reducing the occurrence of accidents and work-related illnesses. OSM’s policy is to provide employees with a safe and healthy work environment and to involve management and employees at all levels to ensure this policy is fully implemented. Based on reporting, this attribute of the DOI SHMS needs only minor improvement.

**22. 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.

The BLM national safety office is regularly consulted to assist with selection of state safety managers and a team of senior level safety directors was selected to review applications for the top safety management position in the BLM. State safety managers are consulted when selections are made for district level safety positions. This practice ensures that pertinent qualifications are recognized for the work to be conducted in BLM.

The FWS bureau provides highly competent and responsive staff guidance and assistance to managers and supervisors relative to their safety and health responsibilities. The counsel and direction that the safety and health staff provides to the field is customized to meet specific Service needs by function (job task) and by specific site location.

Within USGS, the role of the full-time OSH staff is to provide line management with technical advice and information to assess risk and make appropriate implementation decisions. To support local field program implementation, the USGS has assigned full time staff to Regional Director, supported by Office of Management Services OSH staff. While the OSH staff is competent and capable in providing OSH support, the USGS continues to encourage and fund professional development and training opportunities to expand their knowledge and skills.

Within IA, most regions have the support of top management and encourage line managers and supervisors to seek out the regional safety manager for support and technical

assistance. Most regional safety managers are competent and very eager to lend their expertise and assistance to line managers and supervisors. Less qualified safety managers/acting safety managers or CDSO's refer most technical questions/issues to headquarters Division of Safety and Risk Management. The DOI concludes that this attribute of the SHMS to be highly effective throughout the agency.

**23. 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.

In BLM, CDSOs are appointed in writing and their orders provide them the authority to carry out their assigned duties. Safety and health staff are hired with the authority to carry out their assigned duties. While safety staff does not have line authority, employees in these positions may report directly to their senior official for safety issues if necessary. Employee interviews during program reviews indicate that managers are supportive of the safety and occupational health program in their offices.

In BOR, safety management evaluations conducted by BOR's safety office, as well as by DOI, have found that managers are provided adequate resources to support the Safety Program. A DOI evaluation of BOR's Safety Program found that: "Reclamation senior leadership and management demonstrate leadership and management commitment for safety and occupational health and have established essential resources and various management systems for the implementation of the safety and occupational health program."

Regional Managers in IA are supportive in ensuring effective implementation of the safety and health program. Safety managers have the authority to conduct safety and health inspections at both IA and Tribal 638/Contract work sites, provide training, and to make recommendations for safety and health improvement.

Within FWS, the delegation of authority for personnel to carry out safety and health responsibilities is included in each Service safety and health policy. The execution of safety and health responsibilities is carried out at each level of the organization, with no encumbrances found during recent bureau safety and health evaluations. FWS policy 240 FW 1, *Safety Program Management* <http://www.fws.gov/policy/240fw1.html> states supervisor's specific responsibilities for safety program management. Service policy 240 FW 1 also covers employee responsibilities.

**24. Managers allocate the resources needed to properly support the organization’s SHMS.**

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.

Within BLM, managers continue to struggle with balancing workload needs and limited funding across their areas of responsibility. In some offices, safety responsibilities were delegated to untrained CDSOs without consideration of workforce risks where full time safety positions were cut or lapsed. Funding for safety awards programs is mostly non-existent. Program management reviews indicate that funding is adequate to provide local safety training that does not involve travel and to provide for occupational health screening where indicated by exposure assessments. While safety budgets do not allow for all abatement costs, managers ensure that funding is provided through other channels to ensure abatement of identified hazards.

In BOR, leadership has established sound safety and occupational health resources throughout key levels of the bureau (bureau, regional, and local operational units such as area offices/power plants/dams). At the bureau level, an experienced SOH Manager is in place supported by other capable staff. Regional offices also have experienced and capable SOH managers and professional staff. Collateral duty safety personnel are in place where deemed necessary to support local offices.

The FWS operates in a decentralized manner. Each region is responsible for mission success, and while the bureau headquarters-related divisions offer program support, the regions are not direct-reports. Each region is responsible for allocating budget dollars for their own programs. The FWS Division of Safety and Health has a budget only for its office. The organic nature of the bureau safety program lends itself to resource support at the most logical levels – where the action occurs. Generally speaking, each duty station allocates what limited resources they can for the local program, while larger, defined safety programs such as the Motorboat Operators Certification Course and the Heavy Equipment program are funded at the Region or Headquarters levels, with the programs that use the equipment resourcing the safety and health systems required to protect employees.

In IA, the safety and health program is sorely underfunded and operating under constrained resources. There is an effort to centralize compensation at IA; however DSRM lacks the resources to fund the position of an IA workers compensation manager as required by DOI policy. Further, Indian Affairs lacks the resources to also hire an industrial hygienist, as

required. Several regions do not have enough monetary resources to fund full time safety manager positions, let alone other safety or support staff. Two regions and one post-secondary location receive no funding for the program. Alaska and Pacific Regional and Haskell Indian Nations University management supports the safety programs by allocating funds from other regional programs to meet requirements. This support is usually limited to availability and not enough to complete all program requirements.

In USGS, internal safety and radiation safety program reviews conducted over the last four years determine the best organizational and funding structure to support a comprehensive and effective safety program, the DASHO, in collaboration with the Executive Leadership Team, increased the number of FTE and associated funding by approximately 20 percent. Not only were Health Physicist positions created to provide radiation program support, but specialized programs were also enhanced to match the risk—with aviation, watercraft, and dive safety program managers converted from fifty percent to full time, supplemented by geographic specialized manager funding. In FY 2015, the large vessel program manager was also converted to full time.

**25. Managers assure that appropriate safety and health training is provided.**

0	1	2	3	NA
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In BLM, program management reviews and annual accomplishment reports indicate that basic safety training is provided for employees, unless overnight travel is needed to accomplish training. Travel restrictions impact the ability of safety staff to receive specialized safety training that is not available within BLM. One example of management commitment to safety training is the DASHO’s executive decision in 2014 to centrally fund on-line defensive driver training to help reduce the hazards of driving, one of BLMs most hazardous activities.

In the FWS, managers and supervisors have been trained in their safety and occupational health responsibilities. The bureau has many avenues for personnel to receive safety and occupational health training for the mission sets required of employees, youth groups, and volunteers. Managers and supervisors are aware of end ensure that appropriate safety and health training is provided. Evidence of completed training for employees is part of Regional and Headquarter safety and health evaluations.

Within IA, some high hazard organizations do provide the appropriate safety and health training to employees. Although Great Plains and Rocky Mountain Regions safety managers provide a safety and health training plan for all employees through DOI Learn, not all managers at all levels have encouraged or implemented the plan. Other regional managers do support other types of safety and health training put on or sponsored by the safety manager; however they do not initiate required training on their own.

Reclamation’s SAF P01 policy lists employee training as one of the responsibilities of managers: <http://www.usbr.gov/recman/saf/saf-p01.pdf>. Managers use DOI Learn as their primary means of tracking employee safety training. Additionally, in FY 2015 Reclamation will require all supervisors to take an internally developed supervisor safety course (Managing Employee Safety and Health or MESH), which will emphasize the supervisor’s responsibility for ensuring their employees receive appropriate safety training.

The USGS organizational managers demonstrate safety and health leadership; promote a culture of safety and health in the organization; and support effective operation of the safety and health management system by ensuring that appropriate safety and health education and training is provided to workers, supervisors, and managers. The USGS provided 17,898 hours of training, completed through online sources in FY 2014 and which is in addition to instruction provided by supervisors specific to the employee job and local work environment. Based on reporting, this attribute of the DOI SHMS needs only minor improvement.

**26. Top management is involved in the planning and evaluation of safety and health performance.**

0	1	2	3	NA
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Within BLM, all national level safety and occupational health program management review reports are reviewed by the DASHO and transmitted to the senior manager in each state. Corrective action plans for deficiencies noted in the reports are transmitted through senior managers back to the DASHO. At the state level and local level, management teams are engaged with safety staff to ensure tracking and abatement of deficiencies related to inspections or employee reports of hazards. Senior managers in each state are kept apprised of facility conditions through correspondence from the CASHE program manager. Planning for annual safety goals is accomplished with engagement from managers. Annual action plans are discussed with management teams and the national level plan is approved by the DASHO. Program management reviews indicate that managers are generally engaged in providing safety messages at all employee meetings and in “Safety Week” activities.

In BOR, top management takes an active role in the planning and evaluation of safety and health performance. In response to a DOI evaluation of Reclamation’s SOH Program, BOR created 21 Safety Action Plan (SAP) teams to address DOI’s findings and recommendations. This SAP effort is overseen by BOR’s DASHO, with each of the 21 SAP teams being led by an executive sponsor at the Regional Director level. In accordance with ANSI Z-10 principles, it is BOR’s policy to have all safety staff report directly to leadership at their level (e.g. Regional Director, Area Office Manager, etc.). Finally, top management is kept informed of key SOH information on a quarterly basis through the distribution of “safety dashboards.”

Within FWS, top-down management involvement in safety and occupational health was an area identified for improvement in 2014. Top management at headquarters, within the reporting chain of the Division of Safety and Health, are engaged in planning safety goals and developing actionable strategies achieve stated goals. Work continues to build-out to safety an engaged culture within other divisions at headquarters. In 2014, top management across the bureau demonstrated visible management leadership by personally tracking safety performance in the form of the completion rate for mandated on-line “Safety for Supervisor” training for their respective Region or Division.

To better involve IA senior management in planning and evaluation of safety and health performance, a management review process was developed and will begin implementation in 2015. This review provides a process for senior management to formally review the effectiveness of the Safety and Occupational Health Management System. Regional leadership is involved in the planning and evaluation of safety and health performance at varying degrees. Many regions have management that are visibly engaged in most aspects of the program, while others offer support but are not active in the performance of the program. At many field locations management is actively involved in the safety program by participating in safety committees, reviewing safety and health policies, and implementing those policies. Based on reporting, this attribute of the DOI SHMS needs only minor improvement.

In OST, administrative review teams schedule annual visits to various field office locations to evaluate safety, health, and ergonomics in the workplace. Review teams coordinate their reviews with top management and interview supervisors at each location to obtain their safety health concerns; review information is then shared with top management.

The USGS Executive Leadership Team (ELT) is provided periodic briefings on safety and health topics and the DASHO brings issues that need their attention to the ELT table for discussion and resolution. In addition, all Associate and Regional Directors are responsible for OSH program implementation within their respective areas of authority and work with their respective full time safety staff to address program needs and advancement. The USGS OSH Council forum is the main planning and evaluation group within the bureau for OSH issues and membership includes management representation from each Region and Mission area. In addition, OSH performance metrics are also stepped down to all Region and Mission areas and tracked and posted on our internal website. Based on reporting, this attribute of the DOI SHMS needs only minor improvement.

**VII. EMPLOYEE PARTICIPATION**

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

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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 reasonably concludes that this attribute of the DOI SHMS needs only minor improvement.

Most offices in BLM have appointed safety committee members and employees have the opportunity to share safety concerns with their supervisors or the safety committee, or during all-employee meetings and safety presentations. Employees are given the opportunity to participate on safety committees and Safety Week activities are developed with employee participation considerations. Policies are staffed across the bureau so that employees are given the opportunity to comment on content.

The BOR has established mechanisms, forums, and opportunities for employee involvement. These include safety committees, toolbox safety meetings, involvement with the Collateral Duty Safety Representative program, participation in Safety Action Plan teams, and submittal of articles to Reclamation’s quarterly safety newsletter *The Safety Factor*.

Employees in FWS inform the status of the safety program on an ongoing basis through communication with colleagues and supervisors. Personal protective equipment selection, safety equipment, and specific work equipment advice and recommendations are made by experienced “front-line” staff and positively acted on by supervisors and management. Formally, employees participate in safety committees, safety meetings and local facility safety and health inspections. Lastly, employees provide physical hands-on (versus on-line) formal training and on-the-job training of other employees. These activities ensure the process of feedback on employee input is solicited, received and positively acknowledged.

Employees in IA are involved in safety and health issues through participation in established safety and health committees. Constant efforts to recruit employee participation and establishment of new safety and health committees are made by the safety program. Safety Week/Month activities such as seat belt checks, Safety, Health, and Wellness Fairs, flu vaccination clinics, training, and lecture sessions also involve

employees with hands-on participation. Safety bulletins, flyers, and brochures are also provided and most posted on regional share/common drives.

**28. Employees are involved in organizational decision-making in regard to the allocation of safety and health resources.**

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Within the DOI the decisions for allocation of funding for safety resources are generally made at the management level, with some input from the DOI safety council. The Department concludes that this attribute of the DOI SHMS needs only minor improvement.

In BLM, resource decisions are made at the management team level with some input from safety committees, CDSOs, or district safety managers. Individual employees work through their supervisors to obtain funding for PPE, safety supplies, or equipment needed within their program area. These funding requests are considered in the process of determining annual budgets.

Within BOR, employee involvement in safety resource allocations generally occurs in one of two ways. The first is through a direct dialogue between employee and supervisor, regarding the employee’s perception of needed safety resources. The second is usually through safety committees, where employees transmit their perception of needed safety resources through their safety committee representative, and then the safety committee takes appropriate action. Currently, the main method for evaluating the effectiveness of these two processes is through Safety Management Evaluations (SME) conducted by the Reclamation Safety and Health Office. During an SME, staffs at all levels of the organization are interviewed. In the course of these interviews the SME evaluation team determines whether or not employee input into safety resource allocation is occurring. In general, employee input is sought and factored into safety resource allocation decisions, especially in the fields of PPE and training

Employees in the FWS are involved in organizational decision-making in regard to the allocation of safety and health resources. Employees participate in developing safety policy and safety training. There are various employee work groups that provide the organizational framework for recommending safety and health resource and training allocation. In addition, because of the uniqueness of their missions, employees are consulted on for safety resource and training allocation. Employees inform the status of the safety program on an ongoing basis through communication with colleagues and supervisors.

Employees in OST are invited and encouraged to submit suggestions and feedback to OST’s WIT/Employee Programs Advisory Board anytime. This team is comprised of employees, including management, from our headquarters office as well as various field offices. They meet to discuss the safety, health, and ergonomic hazards associated with

changes as they occur within our bureau. Recommendations to eliminate the hazards are made and affected offices take appropriate measures to create a positive outcome.

Employees within the USGS participate or are involved in OSH decision making and resource commitment by involvement in local safety and health committees, assisting with development of task specific job hazard analyses and chemical hygiene plans and via direct input to their line manager. They also have the means to participate in the bi-annual customer survey to assess bureau safety and health performance and can contact their respective collateral duty safety and health program coordinator or full time staff on any OSH issue.

As a whole, IA employees do not participate in the allocation of safety and health resources.

**29. Employees are involved in organizational decision-making in regard to safety and health training.**

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In BLM, all training decisions begin with an employee request that is either approved or disapproved by their supervisor. For training decisions that involve expenditure of funding, managers are involved with approval of training requests. The BLM National Training Center provides an all-employee survey annually to determine what training is most needed or requested by employees and managers. Safety managers who schedule training within their area of operations take into account the needs of employees as determined through surveys, inspections, or changes in personnel. Offices generally use “Safety Week” as a way to accomplish basic safety training and field safety skills for all employees, to include seasonal staff.

Within BOR, employee involvement in safety training decisions generally occurs in one of two ways. The first is through a direct dialogue between employee and supervisor, regarding what types of training the employee would like to take. The second is usually through safety committees, where employees transmit the safety training requests and feedback through their safety committee representative, and then the safety committee takes appropriate action. Currently, the main method for evaluating the effectiveness of these two processes is through Safety Management Evaluations (SME) conducted by the Reclamation Safety and Health Office. During an SME, staffs at all levels of the organization are interviewed. In the course of these interviews the SME evaluation team determines whether or not employee input into safety training is occurring.

Employees in FWS are involved in organizational decision-making in regard to the allocation of safety and health resources including safety and health training. There are various employee work groups that provide the organizational framework for recommending safety and health resource and training allocation. In addition, because of

the uniqueness of their missions, employees are consulted on for safety resource and training allocation. Employees inform the status of the safety program on an ongoing basis through communication with colleagues and supervisors.

Employees in USGS participate or are involved in OSH decision making related to training decisions by involvement in local safety and health committees, or through direct interactions with line management and respective collateral duty safety and health program coordinator or full time staff on any OSH issue. In addition, many modifications to training online courses and instruction have been the direct result of employee suggestions on content or functionality.

The OST is a small office that has worked diligently to increase employee involvement by encouraging them to serve on Work Improvement Teams/Employee Advisory Boards and volunteer to serve in collateral safety and health roles. Their involvement in these two areas will bring new ideas for change to safety and health training. The Department concludes that this attribute of the DOI SHMS needs only minor improvement.

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

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Within BLM, States allow for employees to fully participate in their national and state-level safety program management reviews through one-on-one interviews. In combination with interviews, the review process effectively incorporates an anonymous all-employee survey as another means for employees to express their views on how well the safety program is being implemented in their office. When district safety managers and CASHE team members perform inspections or audits, an offer to participate is extended to employees and union representatives.

In FWS, employees at the duty station level perform program reviews and facility inspections. The supervisor, CDSO, and other staff assist in these evaluations. Managers and supervisors are well aware and actively engaged in the annual requirement to perform safety and occupational health evaluations/inspections of their facility and safety programs. Managers participate in inspections, review outcomes of inspections, provide feedback, and implement action plans to correct deficiencies. Results of inspections are shared through safety and health committee meetings, staff meetings, and employee postings.

Although field organization employees help provide direction via Councils and Committees, the primary means to obtain employee feedback to help evaluate OSH performance is by a customer survey. The USGS issues a bi-annual employee opinion survey for facilitating program awareness and assessing the USGS OSH program based on internal employee beliefs with respect to specific DOI/USGS strategic plan goals and objectives. All employee survey results and comments are reviewed and discussed within the Bureau OSH Council to establish program enhancement/improvement

initiatives/actions based on areas of significant disagreement or adoption of employee suggestions. OSH initiatives arising out of this process are incorporated into the USGS OSH Program Action Plan that is forwarded to the Department of the Interior annually.

OST's Work Improvement Teams, comprised of employees from our headquarters office as well as various field offices, provide a forum for employees to brainstorm and develop innovative ways to improve the workplace, and provide feedback on workplace activities inclusive of safety and health issues. Recommendations are reviewed by top management. Many of their suggestions have been implemented and have made a positive impact on the workplace.

With the exception of some safety committees, IA employees, as a whole, do not participate in the evaluation of safety and health performance.

The Department considers this attribute of the DOI SHMS to need only minor improvement.