



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240



APR 21 2016

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 (CY) 2015 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 2015. These accomplishments are highlighted in the accompanying Annual Report. The report contains all requested information on the Department's Occupational Safety and Health Program's 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 2016

CY 2015 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)**

	Name	Official Title	Telephone	E-mail
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OSH Director:	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. Bureaus continue to emphasize safe driving through training (defensive driver training, 4x4 driver training, and vehicle rodeos during DOI *Safety Week*) and management emphasis.

The U.S. Geology Survey (USGS) conducts very comprehensive analyses of its bureau motor vehicle-related accidents. The USGS is able to track bureau vehicle mileage to demonstrate a comparison between miles driven and number of accidents and their associated costs. For example, during FY 2015, USGS employees logged 22,778,763 miles, equating to one accident per every 219,000 miles driven. Property damage costs are relatively low, averaging \$.011 cents per vehicle mile driven. The USGS will continue to focus on motor vehicle accident reductions through mandated employee training in FY 2016.

During calendar year 2015, the DOI recorded 618 motor vehicle accidents. These accidents were investigated to determine causes, seat belt usage, operator training, and distracted driving factors. Many of these accidents involved backing into objects, jackknifing trailers while backing, being struck from behind, striking nearby objects, and striking animals.

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

The POWER Initiative formally ended in 2014. Despite this, Interior continues to be able to track agency POWER metrics and several bureaus have continued to use the POWER Initiative metrics to improve its safety and health programs in CY 2015 and beyond. The FY 2015 DOI Total Case Rate (TCR) and Lost Time Case Rate (LTCR) goals of 5.02 and 1.57 were met.

The NPS is not currently using all of the previous POWER goals as metrics. However, the Service continues to use a number of measures to compare year-over-year data and trends. Since 2013, the NPS has annually provided three-year retrospective safety profiles (i.e., dashboards) to all NPS operating units, regions, and national program centers. The dashboards include: a summary of recordable and days away, restricted or transfer (DART) rates; a summary of workers compensation chargebacks and continuation of pay; and, annual top causes of injury/illness. Also included are the ratio of safety professionals to employees, and the number of employees completing training in Operational Leadership (i.e., Operational Risk Management) which is the bureau’s behavior-based safety program. The profiles provide field managers with a succinct summary of past performance. The data contained in the dashboards is used to target specific areas of concern at the local level, within regions, and nationally.

DOI POWER Goals	FY 2009 Baseline	FY 2015 Target	FY 2015 Actual
Reduce Total Case Rate	6.43	5.09	5.02
Reduce Lost Time Case Rate	2.21	2.19	1.57

Interior experienced 2,850 employee injury and illness recordable cases in CY 2015. The top three injury types were associated with slips, trips, and falls; exertions; and being struck by/contact with objects.

b. Illnesses, Injuries, Fatalities & Catastrophic Events.

The DOI’s most commonly reported injuries and illnesses continue to be related to slips, trips, and falls; exertion; and contact injuries. Improper material handling and inattention resulting in falls were the most common causes identified. Strains and bruising topped the nature of injuries. Largely because of these findings, the bureaus have taken a variety of steps to address these issues. Some steps included: holding safety discussions at leadership meetings, sending employee reminders during inclement weather conditions, awareness campaigns emphasizing attention while walking, and a variety of other safety awareness presentations and discussions conducted throughout the bureaus. Additionally, bureaus and offices have and continued to take a variety of other actions that have included conducting risk assessments to address the use of appropriate footwear while working in indoor and outdoor work environments, 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.

The NPS identified injuries due to exertion and slips, trips, falls as the two leading causes of loss within the bureau, resulting respectively in a total of 458 and 393 cases in CY 2015 – approximately 44% of all NPS cases. In an effort to reduce these types of injuries, the NPS is taking several actions. The Service has established a national Wellness Program and is currently developing policy and guidance to promote employee health and fitness across the bureau. This program will include information on wellness activities and provide operating units with suggestions for implementing and managing effective programs to prevent exertion-related injuries. During the Service’s annual National Safety, Health, and Wellness Awareness Day, field managers are asked to evaluate common hazards/injuries and to develop training and other risk reduction measures. Many of these actions have focused on reducing musculoskeletal injuries. Best practices from this effort have been shared across the Service.

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

c. 29 CFR 1960 Requirements.

1) 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 is responsible for providing management direction and support necessary to fulfill DOI’s policy commitments. The OSH office develops the Program policies, procedures, directives, standards, objectives, handbooks, and guidelines for the Department-wide Program that promote 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 resources to abate unsafe or unhealthful conditions, purchase safety supplies and personal protective equipment, and provide for training as necessary.

Employee safety funding requests are generally addressed at the local level unless the implications are common across a bureau, at which point it's often handled at a Bureau level. Most DOI bureaus do not receive sufficient funding to effectively support awards programs. Notices of unsafe/unhealthy working conditions are used infrequently and managers generally ensure abatement of unsafe/unhealthy working conditions when they are notified.

2) Field Federal Safety & Health Councils.

Members of the DOI OSH office 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 (FFSHC). Due to the remoteness of many DOI's sites, DOI has not focused on participation in the activities of FFSHCs 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.

Specific Bureau/Office Activities:

In BLM, three safety managers within their respective cities and states (Anchorage, Alaska; Denver, Colorado; and Sacramento, California) participate in FFSHCs. Individual support ranges from serving as executive board members, to hosting meetings, generating meeting minutes, and assisting with council programs.

Within IA, there are eleven employees involved with the FFSHCs in New Mexico, Kansas, Arizona, and Colorado. Of these employees, one safety manager was the Vice-Chair for the New Mexico Roadrunner Chapter. This unit was awarded the Category I, Notable Recognition award for calendar year 2014. Another employee is currently developing and implementing an electronic platform for the New Mexico Roadrunner Chapter members to collaborate and share ideas, as well as to serve as an electronic library. IA uses newsletters, informational bulletins, and email reminders to encourage participation and involvement with local FFSHCs.

In the NPS, several personnel actively participate in their local councils. Others serve in leadership roles. In CY 2015, the Alaska Regional Safety Manager completed a three-year term as the chair of the Anchorage FFSHC. The NPS Alaska Regional Office also partnered with the Anchorage Council by hosting an OSHA Collateral Duty Course for Other Federal Agencies (OSHA 6000). Additionally, the Service-wide Occupational Safety and Health Program Manager serves on the Metropolitan Washington FFSHC program committee.

3) Inspection of the Safety & Health Management System (SHMS).

The DOI OSH office conducts internal safety and health program evaluations of the bureaus/offices. In CY 2015, the DOI OSH office, with contract support from Federal Occupational Health, conducted safety and health program evaluations of the Office of Surface Mining, Reclamation and Enforcement; Bureau of Ocean Energy Management; and Bureau of Land Management. All of the 2015 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 Unhealthful Working Conditions received at the agency level were sent to the appropriate bureau/office national office for corrective action. Internally the bureaus/offices coordinated with their respective regional offices for closure. In the past, there here have been instances where Notices of Unsafe and Unhealthful 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 Unhealthful 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:

In BLM facility inspections are conducted on a regular basis by local safety managers. Comprehensive facility safety, health, and environmental reviews are conducted on a 3-year rotating basis through a contracted program. National level program compliance reviews are conducted on a 4-year rotating basis for all states and centers. Both internal and external program audits and facility inspections occurred in CY 2015 in BLM. External inspections were conducted by OSHA at several offices in Region 9 and a third party contractor provided inspection support for the Compliance Assessment Safety Health Environment program. Approximately 135 inspections were reported across BLM, with only 12 inspections being unannounced.

In BOR, all bureau facilities conduct annual workplace inspections as required by OSHA. BOR's Safety Office also conducts Safety Management Evaluations of two regions every year, and focused audits of the remaining 4 regions every year. BOR had one OSHA inspection during CY 2015. It was a planned inspection that resulted in 12 notices of violations being issued. All have since been abated.

In FWS, at the headquarters level, the bureau continues to conduct internal safety and health inspections of its SHMS through its ongoing regional safety evaluation program, where at least two regions per year are assessed on the condition of their SHMS. Regions also perform safety evaluations of duty stations, and each year, duty

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stations perform their own safety inspection and evaluation. Reporting indicates that the FWS received three OSHA visits. Abatements are handled at the local and region level; no challenges reported with the issuances of the notices or responses to the notices. The status of OSHA visits to duty stations as to whether the visits are announced or unannounced is currently not tracked.

The NPS released its National Safety, Health, and Wellness Strategy in CY 2015. The strategy is intended to guide agency safety and health priorities for the next five years. The strategy provides a comprehensive framework for the agency's Safety, Health, and Wellness Management System including periodic internal program reviews. A self-assessment process and a web-based tool have been developed to support the strategy. Beginning in CY 2016, every NPS operating unit will be required to complete an assessment of their current management system using standardized assessment criteria and ratings. Any identified gaps will be addressed using a risk-based prioritization process. Performance tiers have been established to support program maturation over time.

The NPS is routinely inspected by federal, state and local regulatory agencies. During CY 2015, NPS received 10 planned and one follow-up OSHA inspection. Park units fully cooperate with all compliance officers and ensure prompt responses are provided to the appropriate OSHA area office within the due date(s) listed on any notice(s) of violation. Notices are posted as required and all affected employees are informed of inspection results and corrective actions. Hazard abatement documentation is provided to OSHA and all corrective actions are tracked. Finally, a summary of the inspection, identified hazards, and corrective actions is shared with other operating units to ensure that similar hazards that may exist elsewhere are identified and corrected. The NPS did not appeal any OSHA issued Notices of Violation during CY 2015.

The USGS has been conducting and documenting internal SHMS audits using the ANSI Z.10 best practices and the DOI Program Evaluation Guidebook criteria since FY 2010. The DOI Office of Occupational Health and Safety conducted an external SHMS review using the same criteria in CY 2014. The USGS sustained five OSHA inspection(s) during CY 2015, all from OSHA's Region 9 Office. There were 19 total Notices of Unsafe or Unhealthy Working Conditions or violations identified, with most conditions abated prior to final report issuance.

4) 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. 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.

Specific Bureau/Office Activities:

In BLM during CY 2015, Active Shooter Training was a popular topic for safety training across BLM states. Offices continue to support DOI Safety Week through training and presentations to new and existing employees. On an annual basis, BLM assists with providing an interagency Serious Accident Investigation Team training course for investigators, team leads, and subject matter experts who serve on accident investigation teams. The course is taught in a classroom setting and learning is measured through an exam. BLM provided the following on-line training courses for employees at no cost to employees: Supervisory Safety Skills, Globally Harmonized System (HAZCOM), Introduction to All-Terrain Vehicle Use, Introduction to Utility-Terrain Vehicle Use, Defensive Driver, New Employee Orientation, and 4x4 Driving Safety and Risk Management.

The USGS has an aggressive safety and health training program that encompasses all levels of employees and meets the basic program elements of 29 CFR Part 1960, Subpart H for required training and learning experiences for top management officials, supervisors, safety and health specialists, safety and health inspectors, collateral duty safety staff and employee representatives. USGS training is in line with the “*Occupational Safety and Health Training Guidelines For Federal Agencies*” published by OSHA in 2014. The USGS line management maintains funding responsibility for the conduct and completion of employee safety and health training. In addition to DOI Learn documented safety and health training, field organizations further conduct and document local and job specific operational training requirements to ensure that USGS employees are trained to safely perform job tasks.

Furthermore, USGS has been partnering with the DOI, Office of Strategic Employee and Organizational Development (OSEOD) since FY 2003, resulting in a host of Web-based safety and health training to facilitate field compliance with OSHA training requirements. Most recently published was Radiation Safety, developed to facilitate meeting Nuclear Regulatory Commission (NRC) training requirements for employees performing activities under NRC licenses. The USGS and OSEOD are collaborating to complete content updates and page-for-page conversions for 37 USGS safety curriculum courses to the new DOI Learn Lectora online training platform. Expectations are that all courses will be uploaded and accessible to employees via DOI Learn by the end of CY 2016.

The FWS’s OSH training was developed in accordance with the requirements of the OSH Act, 29 CFR Part 1960, and E.O. 12196 and serves as the training itself and/or serves as the curriculum. For example, recently developed and deployed bureau specific on-line “Safety for Supervisors” training specifically covers 29 CFR Part 1960, and E.O. 12196.

The NPS completed evaluation of the training recommendations contained in the *Occupational Safety and Health Training Guidelines for Federal Agencies* released in 2014. These guidelines are currently being incorporated into 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 the NPS Learning and Development Division. At present, NPS does not have a system to determine funds allocated for OSH-related training.

5) 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.

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 2,850 establishments throughout the nation, including remote field offices that do not have the staffing to support full-time safety and health positions. Interior 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 Interior’s bureaus/offices to assure program compliance and integration of safe and healthful practices throughout a wide range of complex activities. Lastly, Interior continues to operate 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. Interior’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. The 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.

In CY 2015, a second round of safety and occupational health program evaluations were started by the DOI OSH Office. The safety and occupational health program evaluations are an assessment of a bureau level program to verify it complies with DOI’s policies and

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requirements, and conforms to good safety and occupational health practices. The evaluation program also identifies program successes and best practices to be shared DOI-wide.

III. GOALS.

DOI WIDE GOALS.

- Engage leadership in promoting a culture of safety
- Better equip and train collateral duty safety officers
- Increase industrial hygiene support throughout the agency

Bureau Specific Goals.

a. BOR

- Improve Safety and Occupation Health culture through implementation of the 21 Safety and Occupational Health Action Teams' recommendations
- Address BOR occupational health program needs
- Establish an Indefinite delivery/Indefinite quantity Medical Surveillance and update pre-employment qualifications
- Develop a life safety standardized assessment tool; start assessment process
- Update bureau safety and health standards
- Address OSHA compliance issues; improve record keeping through the Dam Safety Information System
- Provide safety and occupation health professional development

b. FWS

- Conduct safety and health program evaluations of Regions 3 and 5
- Continue development of Service-specific on-line 8-hour Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) refresher course
- Identify an appropriate on-line system to track inspection deficiencies to abatement
- Conduct monthly telephone conferences with the Division of Safety and Health and all Regional Safety Managers
- Conduct a face-to-face Regional Safety Managers meeting

c. IA

- Continue three year follow-up of Safety and Occupational Health Program Evaluations at the regions
- Establish Safety Committee's at all locations within IA with more than fifteen employees
- Establish CDSO's at all locations with more than nine employees
- Become more proactive in increasing safety and hazard awareness throughout IA
- Effectively target safety training to identify needs at all levels
- Increase safety awareness by promoting and encouraging employees to utilize DOI Learn on-line safety trainings
- Develop safety and occupational health webinars

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- Implement the Safety Management System (SMS) Safety and Health SharePoint on the Bureau of Indian Education network

d. NPS

- Continue implementing the Service's National Safety, Health, and Wellness Strategy
- 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 410 park areas
- Continue implementing its behavior-based safety program, Operational Leadership, which has contributed to a 30% reduction in recordable injuries over the past five years

e. USGS

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

f. BLM

- Ensuring the safety and health of employees is a core organizational value
- Incorporating safety performance into measured organizational and supervisory management and performance standards
- Providing standardized performance metric information for decision makers and leaders at all levels within BLM to use in incorporating safety and health into organizational planning and operations
- Ensuring useful and current safety and health information, guidance and policy documents are maintained, publicized, and made easily available for all employees
- Ensuring effective evaluation, analysis and oversight of safety and occupational health programs throughout BLM
- Enhancing the competency of safety and occupational health professionals across BLM by engaging them in a vibrant and active community of practice which fosters their involvement and professional development and training
- Promoting safety and occupational health through current, relevant safety and health training which is delivered to all employees by means and timing that meets both their needs and regulatory requirements

g. BSEE & BOEM

- Continue to evaluate current bureau Safety and Occupational Health program policies and procedures for deficiencies and gaps; Develop and implement new policies as necessary
- Provide education and training to ensure employees are provided the knowledge and tools needed to perform their work in a safe manner

Appendix 1—Subagency OSH Contacts

Bureau of Land Management

Herbert Carpenter, 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

Monte Bowman, Chief, Reclamation Safety and Occupational Health Program
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Denver, CO 80225
303-445-2695; fax 303-445-6376; mbowman@usbr.gov

Fish and Wildlife Service

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Falls Church, VA 22041
703-358-2255; fax 703-358-1875; mary_parkinson@fws.gov

Indian Affairs

Paul Holley, Safety & Health Manager
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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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Reston, VA 22203
703-648-7552; fax 703-648-7475; wrmiller@usgs.gov

Appendix 1—Subagency OSH Contacts

Office of Surface Mining, Reclamation, and Enforcement

Maurice Banks, Safety & Health Manager

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Mailstop 334

Washington D.C. 20240-0001

202-208-2608; fax 202-219-3100; jbanks@osmre.gov

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 reporting and programmed self-evaluations, the Department considers this attribute of the Safety and Health Management System (SHMS) to only need minor improvement.

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. The second round of evaluations began in CY 2015. 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. The Department considers this attribute of the SHMS to only need minor improvement.

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

0	1	2	3	NA
	✘			

Based on 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 need major improvement.

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

0	1	2	3	NA
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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 policies (DOI DM's as stated above and Bureau specific policies). 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.

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

7. Effective safety and health rules are in place.

0	1	2	3	NA
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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 policies 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 policies 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 policies 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
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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. Since the second round of program evaluations started in CY 2015, overall the bureau programs have showed significant improvement. However, some Bureau self-evaluations found a lack of written programs, deficiencies in employee training, and revealed that some of OSHA’s 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.

The USGS developed and now deploys the DOI-hosted OSHA Inspection and Abatement tool that enables every level of the organization to not only assess compliance with OSH mandated programs, e.g., Hazard Communication, Hearing Conservation, Lock-Out/Tag-Out, etc., but also assists in evaluating management and safety staff conformance with OSHA 1960, DOI and USGS policies. Identified deficiencies or gaps are addressed with findings tracked through abatement. Common findings across organizations or regions are addressed at the bureau level with out-year initiatives developed and resourced to facilitate continuous program improvement.

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

0	1	2	3	NA
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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 has taken many forms from something as simple as placing notations on the hazard report form to more formal spreadsheets and reports. Additionally, a comprehensive inspection and abatement database has been developed and is being rolled-out for bureau use.

For example, the USGS developed and has been using an automated Inspection and Abatement (IAS) database for the past 11 years to document identified inspection hazards and track abatement actions. Collateral duty and full-time safety staff monitor corrective

actions, updating status every 90 days until the hazard is mitigated. In addition, the system sends automated emails to management on the status of open findings monthly. Local management and supervision ensure work orders are initiated as necessary to abate hazards. This system has been adopted by DOI for agency-wide use. The Department concludes that this attribute of the SHMS to be highly effective throughout the agency.

III. PLANNING & EVALUATION

10. Hazard incidence data are effectively analyzed.

0	1	2	3	NA
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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
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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 that this attribute of the SHMS to be highly effective throughout the agency.

Based on reporting, annual safety action plans are developed throughout levels of the organization. Within BLM, safety action plans are developed at the national and state levels annually. A standardized format using leading indicators to measure goals has been implemented across the BLM. 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 with heavy action plan emphasis placed on the results of the Safety and Health Program Evaluations. 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
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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. In CY 2015, the second round of program evaluations started with OSM, BOEM and BLM. Overall these evaluations showed marked improvements as compared to the previous evaluations. 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.

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
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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 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
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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. 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. With a few outstanding exceptions among bureaus, most CDSOs have not received effective skills training to perform their respective duties. The overall average for the Department indicates that this attribute of the SHMS need minor improvements.

For example, in BLM some district safety managers do not have all of the necessary training to perform their duties.

Within IA the bureau continues to struggle with assuring that full-time and CDSOs are trained and competent to perform their assigned duties. IA reports that of the nine full-time regional safety manager positions, there are only three safety managers determined to have the knowledge and skills to manage their respective programs; the others do not have the skill set nor are they adequately trained to implement a comprehensive safety and health program. Due to heavy workloads and lack of resources, the remaining regional safety staff, most of whom have other full-time jobs, have yet to obtain the necessary basic training to develop, implement, and administer their respective safety and health programs. With the exception of the Great Plains Region, a majority of CDSO’s at the agency and local levels also lack the required training.

Conversely, within USGS the requirements in the DOI’s “Safety and Health Training, Technical Skills and Abilities for Collateral Duty and Full Time Safety Personnel Handbook” were mandated by policy for full-time safety and health staff. In FY 2014, the bureau DASHO sponsored and funded attendance for All-Terrain Vehicle Training to enable full-time safety staff to become instructors and teach the field courses. In addition, the DASHO sponsored and funded virtual training courses to attend American Industrial Hygiene Exposition and Conference virtually to facilitate mandated annual training of 24 hours for the full-time OSH staff.

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

0	1	2	3	NA
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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 the resources or line authority. The Department concludes that this attribute of the SHMS to be highly effective throughout the agency.

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.

In USGS, management has provided adequate personnel and financial resources to support the OSH function and delegated authority for program responsibilities across the organization to full time and collateral duty safety professionals to adequately provide support.

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

0	1	2	3	NA
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Interior continues to operate 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 this attribute of the SHMS to only need minor improvement.

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

0	1	2	3	NA
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The DOI policies 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 safety and health performance metrics within the organization. These metrics are tracked, with their final performance conveyed to all employees via an annual report.

While BLM employees are motivated to perform their jobs safely, safety incentive awards are not an influencing factor in most offices since award programs are mostly non-existent in local offices. National recognition programs exist and employees may be recommended for a national award at any time. State directors and most district managers develop a management safety policy to promote safety and occupational health practices. Compliance reviews indicate that management emphasis through local policy statements, discussions at all employee meetings, and living by example help to encourage safe behaviors. Employee and manager performance appraisals also reflect the expectation to work safely. Managers indicate that counseling is used if needed to discourage unsafe behaviors. National safety and occupational health policies were updated in 2014 and continue to be reviewed and updated as necessary.

The FWS policies, procedures, and training assign responsibility for each safety and health task and clearly provide for positive acknowledgement of assigned responsibilities, which includes providing or requesting resources to ensure work tasks are carried out safely.

In response to the DOI program evaluation, BOR created 21 Safety Action Plan (SAP) teams, all tasked with addressing items linked to findings/recommendations from the DOI evaluation. Management has communicated that these 21 SAP teams are a top priority for the agency, and achieved participation in the teams at all levels of the organization. BOR also has active safety committees in all regions, and engages employees through safety newsletters such as *The Safety Factor* (<http://intra.usbr.gov/ssle/safety/Factor/>). Additionally, one of the SAP teams explored safety incentive programs and released a report with guidance on how to implement them.

V. SAFETY & HEALTH TRAINING

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

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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 (NEO) includes applicable safety and health information.

0	1	2	3	NA
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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 health topics for review during employee/volunteer orientations. A BLM policy exists to provide guidelines for conducting NEO in all offices. Many offices use Safety Week as a time to provide safety training for all employees, and to provide NEO for seasonal employees.

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
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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.

Within BLM, standardized training for supervisory safety skills is abundantly available on-line through DOI Learn courses (executive and manager safety training developed through DOI University; DOI Supervisory Skills safety module (new in 2014)) and through the BLM Knowledge Resource Center (KRC). A national webinar that was provided for all supervisors in January 2013 as an introduction to roles and responsibilities was added to the KRC. Sources for classroom training are also recommended during program management reviews. However, since this training is required only once in a manager’s career, program reviews indicate that some managers do not recall what they learned in their training if they completed it many years ago. Employees who serve as supervisors or managers in an “acting” capacity may not have completed this training.

The USGS is a major stakeholder with DOI University in development of online safety training to facilitate the execution of mandated executive, supervisory, employee and collateral duty orientation training. 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.

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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 and continues to be updated as needed. In accordance with BLM procedures, national safety and occupational health policies are released through the DASHO or the Director’s office. The Deputy Director frequently endorses safety policies and procedures when speaking with employees and managers. Additionally, state directors and most 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, BOR’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, and will be distributed IA-wide.

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

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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 were 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 competent regional safety managers are very eager to lend their expertise and assistance to line managers and supervisors. Less qualified safety managers, acting safety managers, and CDSO's refer most technical questions or issues to the IA headquarters office.

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

0	1	2	3	NA
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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 staffs do not have line authority, employees in these positions may report directly to their senior official for safety issues if necessary. Employee interviews during compliance 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. Assignment of safety duties has been made and in most cases management supports the safety mission and responsibilities. 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
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Interior continues to operate 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 this attribute of the SHMS to only need minor 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 compliance 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), including safety managers, safety specialists, industrial hygienists, and fire protection/life safety professionals. 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 BOR has one of the better ratios of staff to SOH personnel, and it also has internal industrial hygiene resources that are often more limited in other bureaus.

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 five 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.

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In BLM, program management reviews and annual accomplishment reports indicate that basic safety training (defensive driving, fire extinguisher training, bear awareness, 1st aid/CPR/AED, ATV/UTV and 4x4 vehicle safety, and evacuation drills) is provided for employees, unless overnight travel is needed to accomplish training. Travel funding restrictions impact the ability of safety staff to meet core competencies when required safety training is not available within BLM. One example of management commitment to safety training is the DASHO’s executive decision to continue 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 employees, youth groups, and volunteers to receive safety and occupational health training. Managers and supervisors ensure that appropriate safety and health training is provided. Evidence of completed training for employees is part of Regional and Headquarter’s safety and health evaluations.

Some high hazard organizations within IA (i.e. Wildland Fire, Roads/Transportation, Forestry, Law Enforcement, Facilities) do provide the appropriate safety and health training to employees. Although the Great Plains Region safety manager provides a safety and health training plan for employees through DOI Learn and although the Rocky Mountain and Northwest Regions are in the development stages, 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 (i.e. office safety, Hazard Communication, lifting, etc.); however most do not initiate required training on their own.

The BOR’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 2016 BOR will require all supervisors to take an internally developed supervisor safety course (Managing Employee Safety and Health), 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 an estimated 6,000 hours of training, completed through online sources in

FY 2015, 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 Compliance Assessment Safety Health Environment (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 BOR’s SOH Program, the bureau 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 to achieve stated goals. Work continues to build-out to safety an engaged culture within other divisions at headquarters.

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 2016. 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.

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 policies, an effective process to involve employees in safety and health issues has been developed. These processes are known, trusted, and used by employees to provide input regarding safety and health issues. These processes involve the solicitation, receipt, and acknowledgement of employee input. Various methods have been developed throughout the agency to engage employees where safety and health issues are discussed. The Department concludes that this attribute of the SHMS to be highly effective throughout the agency.

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. Compliance review surveys indicate that employees have a high comfort level with reporting hazards in their offices. 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. Pacific and Rocky Mountain Regions conducted week long safety activities, as well as the Haskell Indian Nations University hosting a safety and health fair.

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

0	1	2	3	NA
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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, including safety and health training. Employees actively and enthusiastically 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 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.

0	1	2	3	NA
				

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 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 (e.g., 1st aid/CPR/AED, fire extinguisher use, evacuation drills, defensive driver training) and field safety skills (e.g., radio use, tire changing) for all employees, to include seasonal staff. Employee safety committees frequently conduct the planning for Safety Week activities, to include plans for training.

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 Bureau 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. Employees actively and enthusiastically 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 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.

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

0	1	2	3	NA
				

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 Compliance Assessment Safety Health Environment 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.

With the exception of some IA safety committees, 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.