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) 2016 in accordance with Section 19(a)(5) of the Occupational Safety and Health Act.

The Department of the Interior continued to make improvements in its Occupational Safety and Health Program in CY 2016. 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,

[Signature]

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 4310
Stewart Lee Udall Building
Washington, DC  20240

May 2017
Name of Department: United States Department of the Interior (DOI)

Address: 1849 C Street, NW
        MS 4310
        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 Reclamation (BOR)
- Bureau of Safety and Environmental Enforcement (BSEE)
- 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)

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<th>Official Title</th>
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<th>E-mail</th>
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<tbody>
<tr>
<td>DASHO:</td>
<td>Mary F. Pletcher</td>
<td>202-208-4505</td>
<td><a href="mailto:Mary_Pletcher@ios.doi.gov">Mary_Pletcher@ios.doi.gov</a></td>
</tr>
<tr>
<td></td>
<td>Deputy Assistant Secretary for Human Capital and Diversity</td>
<td></td>
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<tr>
<td>OSH Director &amp; Deputy DASHO:</td>
<td>Jim Anderton</td>
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<td><a href="mailto:James_Anderton@ios.doi.gov">James_Anderton@ios.doi.gov</a></td>
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<tr>
<td></td>
<td>Director, Office of Occupational Safety and Health</td>
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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. Presidential Initiatives & Evaluation Metric(s).

        1) Motor Vehicle Safety.

        Department of the Interior (DOI) 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*. 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, and requires employees to wear seat belts and not use cellular phones or similar media devices that cause operator distraction while operating a government motor vehicle or private motor vehicle while on official government business.

        Agency employees are educated through a variety of sources to include defensive driver training courses and safe driving awareness campaigns about the dangers of cellular phone use and text messaging while driving. 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. The Bureaus continue to highlight safe driving through various training sources and communication forums.

        United States Geological Survey (USGS) consistently enforces E.O.13043 related to seat belt use by Federal employees and reinforces these requirements in bureau policy and mandated training for vehicle operators and monitors transportation related accident experience and seatbelt compliance using data from the DOI’s Safety Management Information System. The USGS promotes motor vehicle and transportation safety through a web page to increase employee awareness of policies and requirements related to operating a General Services Administration (GSA) leased or DOI owned vehicle. This site covers a variety of topics from motor vehicle management, all-terrain vehicle safety, maintenance checklists, traffic and flagger safety, and cell phone use/prohibition.

        In FY 2016, approximately 27% of all USGS accidents were motor vehicle related, resulting in property damage costs of $165,047 and Tort Claims costs of $16,700.98. During FY 2016, USGS employees logged 24,794,512 miles (8,736,178 GSA Leased Miles and 16,058,334 Owned Vehicle Miles), equating to one accident per every 227 thousand miles driven. Property damage costs averaged $.006 cents per vehicle mile driven.

        Bureau of Land Management (BLM) policy requires all drivers of government vehicles, or drivers of rental or personally operated vehicles used for government business, receive defensive driver training. Refresher training is required on a three-year cycle. The training is conducted either in classrooms, or on-line using DOI’s Learning Management System, DOI Learn. In addition, 4x4 drivers are required to have training that is specific to the use of 4x4 vehicles. BLM continues to centrally fund on-line
defensive driving courses through National Safety Council to assist offices in training when classroom training is not available.

During CY 2016, in the DOI there were 497 motor vehicle accidents reported, down from 618 reported in CY 2015. These accidents were investigated to determine causes, seat belt usage, operator training, and distracted driving factors.

2) **Evaluation Metric(s).**

DOI uses the Safety Management Information System (SMIS) data as well as results from safety and health program evaluations to measure success in implementing safety and health programs and improving the occupational safety and health program. The agency can track total case rates, lost time rates, recordable and Days Away, Job Restriction, and Job Transfer (DART) rate data. The SMIS data is monitored to establish trends and to identify problem areas requiring additional program resources.

BLM uses case rates and worker’s compensation costs to compare itself to other federal land management agencies. BLM continues to review and measure safety performance through use of SMIS data, and State Offices measure safety performance through use of leading indicators when setting annual goals and documenting annual accomplishments.

Bureau of Reclamation (BOR) tracks employee DART and Recordable rate data. This data is collected and shared throughout the year at both the Regional and the Bureau level.

Bureau of Safety and Environmental Enforcement (BSEE) and Bureau of Ocean Engineering & Management (BOEM) tracks total case rates, lost time rates, recordable and DART rate data. This data is collected and shared at all levels throughout each Bureau.

National Park Service (NPS) uses a combination of evaluation metrics to assess year-over-year trends and performance. The data evaluated include traditional occupational safety and health management metrics such as total case rate, recordable case rate, and recordable and days away, restricted or transfer (DART) rates. Additionally, NPS monitors several forward-looking indicators. Examples of forward-looking indicators include: the ratio of safety professionals to employees at the national, regional, and operating unit level; the number of employees completing training in Operational Leadership (the NPS behavior-based operational risk management program); and, progress toward completion of the NPS Safety, Health, and Wellness Strategy tier criteria.

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

DOI’s most commonly reported injuries and illnesses continue to be related to slips/trips/falls (862); exertion (797); and bitten by (596). Inattention, improper material handling, and animals/insects were the top most common causes identified. Within the bureaus, there have been a variety of steps taken to address these issues. Some steps
included: holding safety discussions at leadership meetings, sending employee reminders during inclement weather conditions, posting of surface condition warning signs, awareness campaigns emphasizing attention while walking, and a variety of other safety awareness presentations and discussions conducted throughout the bureaus.

Slips/trips/falls continue to be BOR’s most common type of injury, accounting for 27% of total injuries. Exertion (i.e., manual material handling) and slip/trip/fall injuries continue to be the top two causes of loss within the NPS, resulting respectively in a total of 422 and 359 cases in CY 2016—approximately 36% of all NPS cases for the year.

**Specific Bureau/Office Activities:**

USGS collateral duty safety program coordinators remain vigilant in notifying employees when icy conditions are present, and work with facilities and GSA to ensure slip hazards are mitigated through the application of anti-slip material. Most importantly, they ensure senior leadership is made aware of cases involving long term tripping hazards so timely repair projects can be undertaken to correct underlying issues.

BSEE and BOEM use educational materials and safe workplace awareness campaigns to promote and provide information about slips/trips/falls and how to prevent them.

Indian Affairs (IA) sees most slips/trips/falls occur during the winter months. Safety managers provide training via DVD/videos and post flyers and informational bulletins on employee bulletin boards and on regional shared/common drives. Preventative measures include winter and walking safety training and awareness, placing warning signage of icy conditions at doorways, placing traction mats at entrances, and working with maintenance personnel to promptly remove accumulations of snow and ice from walking surfaces.

The DOI suffered eight (8) employee fatalities in CY 2016. A summary of the agency’s experience with fatalities, catastrophic events, and other reportable events, pursuant to the revised requirements of 29 CFR 1904.39 that occurred during the reporting period, is contained in Attachment 2, *Fatalities, Hospitalizations, Amputations, Loss of an Eye Report.*

c. 29 CFR 1960 Requirements.

1) **Organization of Agency Safety and Health Mission.**

Within DOI, the Office of Occupational Safety and Health (OSH) function is located under the Deputy Assistant Secretary – Human Capital and Diversity (DAS-HCD) who is the Designated Agency Safety and Health Official (DASHO). The DAS-HCD is under the Assistant Secretary – Policy, Management, and Budget. OSH is responsible for advising and supporting the DOI DASHO. The DOI DASHO 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. OSH develops program policies, procedures, directives, standards, objectives, handbooks, and guidelines for the Department-wide program to promote compliance with legal, regulatory, and policy requirements to reduce risk and liabilities.

DOI-wide safety and health staffs have the authority to work with managers to abate or control hazards. 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 there are safety and health implications 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/unhealthful working conditions are used infrequently and managers generally ensure abatement of unsafe/unhealthful working conditions when they are notified.

Within IA there are budget concerns. Although there is a dedicated budget for the IA Safety and Occupational Health Program, the dedicated amount is not considered sufficient to effectively implement the program. Several IA regions with full-time safety manager positions are not allocated sufficient funding to actually fund the positions. Positions either go unfilled or the incumbent safety manager has other duties assigned by the program that provides additional funding.

2) Field Federal Safety & Health Councils.

OSH attends the Federal Advisory Council on Occupational Safety and Health (FACOSH) on the DASHO’s behalf, 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:

BLM has two safety managers appointed to the Denver and Fairbanks FFSHCs. Encouragement to attend and support these councils range from serving as executive board members, hosting meetings, generating meeting minutes, and assisting with council programs.

IA has provided FFSHC support to the Roadrunner Chapter, Region VI in Albuquerque, NM; and in Region VIII in Denver, CO. IA uses newsletters,
informational bulletins, and email reminders to encourage participation and involvement with local FFSHCs.

NPS Intermountain Region (IMR) partnered with the Denver FFSHC hosted several of the council’s meetings at the regional office building in Lakewood, CO. Additionally, the IMR Occupational Health Manager was selected to a three-year term as the council’s secretary, and continues to support the Metropolitan Washington FFSHC Council on their program committee.

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

OSH conducts internal safety and health program evaluations of the bureaus/offices. In CY 2016, OSH with contract support from Federal Occupational Health (FOH), conducted safety and health program evaluations of the Bureau of Ocean Energy Management and Bureau of Land Management. All of the internal 2016 OSH program evaluations were announced, including the site visits.

In addition, the Department of Labor’s (DOL) Occupational Safety and Health Administration (OSHA) 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 national bureau or office for corrective action. Internally the bureaus/offices coordinate with their respective regional offices for closure.

Specific Bureau/Office Activities:

**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. The compliance review process is reviewed annually to account for any programmatic changes and to continually improve the review process. Over 100 inspections were reported across BLM, with only three inspections being unannounced.

**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 5 regions every year. BOR had two OSHA inspections in CY 2016. One inspection was a complaint, and the other was a referral. The first inspection resulted in a citation for woodworking tools, standard 29 CFR 1926.304 (h)(1), which was abated 6 days after the citation was issued. The second inspection was a complaint for life safety code, which was abated within 3 weeks of the citation being issued.

**IA.** There were 7 OSHA inspections with the following findings: Complaint of mold – no *Notice of Unsafe or Unhealthy Working Conditions* issued; inoperative fire suppression system, failure to inspect fire extinguishers, and exit signage issues that
resulted in Notices of Unsafe or Unhealthy Working Conditions issued – abatement plan initiated with violations tracked to closure. An inspection found an obstructed fire alarm pull station, obstructed exits and power strip/surge protectors used as permanent wiring; three Notices of Unsafe or Unhealthy Working Conditions issued – all violations were abated. The final inspection resulted in a Notice of Unsafe or Unhealthy Working Condition due to steam tunnels which were confined spaces containing asbestos were found not to be secured or labeled with warning labels. Safety staff oversaw the tunnel entrances being secured with padlocks and properly labeled by maintenance personnel.

**NPS.** NPS is routinely inspected by federal, state and local regulatory agencies. During CY 2016, NPS received 14 planned and two follow-up OSHA inspections. 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. NPS did not appeal any OSHA issued Notices of Violation during CY 2016.

**USGS.** 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. OSH conducted an external SHMS review using the same criteria in CY 2014. USGS had eight OSHA inspection(s) during CY 2016. There were thirty-one total Notices of Unsafe or Unhealthy Working Conditions identified, with most conditions abated prior to final DOL report issuance. USGS uploads all OSHA inspections internally within the DOI SMIS Inspection and Abatement System under the responsible audited organization, which then tracks and documents the abatement of findings and corrective action(s). There were no extraordinary challenges within the Bureau regarding notice issuance or abatements.

4) **Occupational Safety and Health Training.**

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. DOI’s online learning management system, DOI Learn, is used to provide the majority of safety training to employees. The agency does not have collective documentation for the funding allocated to OSH training.

Courses conducted throughout the agency in CY 2016 included: 1st Aid/CPR/AED, Wilderness First Aid, Bloodborne Pathogens, Epinephrine Administration For Field-Going Employees, Safety In The Woods, Hazard Tree Analysis, Tower Climbing And Rescue, Radio Frequency Safety, Defensive Driving, All-Terrain Vehicle Use, Utility-Terrain Vehicle Use, 4x4 Driving, Motorboat Operator, Chain Saw Use, Forklift Operation, Trail Dozer Operation, Trailer Towing, Heavy Equipment Safety Refresher, HAZCOM/GHS, Fire Extinguisher Use, Fire Prevention/Exit

5) **Whistleblower Protection Program.**

DOI provides Whistleblower Protection 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. OIG has conducted Whistleblower Protection Program (WBPP) investigations since 2003.

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. OIG monitors these referrals to assure management has responded appropriately.

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.

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<td>The attribute needs minor improvement.</td>
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DOI Safety & Health Management System Overall Assessment Score

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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 235 full-time occupational safety and health professionals who support on average approximately 70,000 employees and 300,000 volunteers. Interior currently has 2,131 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 900 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 healthy practices throughout a wide range of complex activities. Issues are prioritized based upon the most critical health and safety needs due to the continued lack of available resources.

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. SMIS is designed for use at any level within the DOI and provides for the electronic filing of accident reports and Worker’s Compensation Program injury and illness forms. SMIS can also generate reports for any DOI organization or combination of organizations.

Occupational Safety and Health (OSH) program evaluations are scheduled for CY 2017. OSH program evaluations are an assessment of a Bureau’s safety program to verify compliance 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 to be shared DOI-wide.

III. GOALS.

OSH GOALS.

- Increase awareness by collaborating with Bureaus and Offices to identify, mitigate and address critical Occupational Safety and Health issues, concerns and needs.
- Increase collaboration between Occupational Safety and Health programs and professionals within DOI and with our Federal and industry partners to maximize resources and effectiveness.
- Improve resource availability by developing, leveraging and serving as a clearinghouse for Occupational Safety and Health best practices.
- Improve the DOI Occupational Health decision making process by strengthening the structure, practice and focus of the governing councils.
- Improve data management by strengthening our ability to collect, manage, analyze and report critical Occupational Safety and Health data and information.

Bureau Specific Goals.

BOR

- Review and Revise Reclamation SOH Programs and Policies.
- Improve SOH Program Visibility and Management Awareness and Involvement.
- Address Significant Reclamation Occupational Health Program Needs.
- Address Facility SOH Needs.

FWS

- Conduct safety and health program evaluations of Regions 5 and 6.
- Implement beta testing of an on-line system to track inspection deficiencies to abatement.
- Conduct monthly telephone conferences with the Division of Safety and Health and all Region Safety Managers.
- Conduct a face-to-face meeting with the Division of Safety and Health and all Region Safety Managers.

IA

- Conduct three-year follow-up of Safety and Occupational Health Program Evaluations at the regions.
- Conduct to establish Safety Committee’s at all locations within IA with more than fifteen employees.
- Continue to 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 additional Standard Operating Procedures (SOPS).
- Develop and safety and occupational health webinars.
- Continue to update and expand Safety Management System (SMS) Safety and Health SharePoint system.

**NPS**

- Continue implementing the Service’s Safety, Health, and Wellness Strategy Framework. The strategy includes four goal areas: 1) Leadership, Management, and Employee Commitment [Plan], 2) Implementation & Operations [Do], 3) Assessment, Reporting, and Corrective Actions [Check], and 4) Review and Continuous Improvement [Adjust]. As part of the strategy, the NPS will continue its efforts to build an effective safety management system that will lead to greater consistency in program implementation, capture and share near miss information and lessons learned, and employee involvement across its 418 park units.
- Continue implementing its behavior-based safety program, Operational Leadership, which has contributed to a 30% reduction in recordable injuries over the past five years.
- Move forward with the procurement of a comprehensive electronic Safety Management System (eSMS). The system will provide the information technology platform to increase efficiency and develop consistency in program management and documentation.

**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.

**BLM**

- Ensuring the safety and health of employees is a core organizational value and incorporating safety performance into measured organizational and supervisor 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 that useful and current safety and health information, guidance and policy documents are maintained, publicized, and made easily available for all BLM employees.
- Ensuring the 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.

**BSEE & BOEM**

• Continue to focus on deficiencies and gaps identified in the DOI’s Safety Program Evaluation Report as a footprint for improving the effectiveness of the bureau’s SHMS.
• The Bureau will continuously evaluate its current Safety and Occupational Health program policies and procedures for deficiencies and gaps, develop and implement new policies as necessary, and provide education and training to ensure employees are provided the knowledge and tools needed to perform their work in a safe way.
Appendix 1—Subagency OSH Contacts

Bureau of Land Management
Herbert Carpenter, Chief, Division of Safety, Health and Emergency Management
20 M Street, SE - (Room 3126)
Washington, D.C. 20003-3503
202-912-7498; fax 202-912-7109; hcarpenter@blm.gov

Bureau of Safety and Environmental Enforcement
Rose Capers-Webb, Safety & Health Manager
45600 Woodland Road
Sterling, VA 20166
703-787-1541; fax 703-787-1437; rose.capers-webb@bsee.gov

Bureau of Ocean Energy Management
Kristen Daniel, Safety & Health Manager
1849 C. Street, N.W.
Washington, DC 20240
703-787-1064; kristen.daniel@boem.gov

Bureau of Reclamation
Monte Bowman, Chief, Reclamation Safety and Occupational Health Program
P.O. Box 25007, D-1430
Denver, CO 80225
303-445-2695; fax 303-445-6376; mbowman@usbr.gov

Fish and Wildlife Service
Daryl Avery – Safety Manager
5275 Leesburg Pike
Falls Church, VA 22041
703-358-2255; fax 703-358-1875

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

National Park Service
Michael May, Chief, Office of Risk Management
1201 Eye Street, NW MS-2430
Washington, DC 20005
202-513-7222; fax 202-371-2226; michael_may@nps.gov
Appendix 1—Subagency OSH Contacts

U.S. Geological Survey
William R. Miller, Safety Manager
12201 Sunrise Valley Drive, MS 246
Reston, VA 22203
703-648-7552; fax 703-648-7475; wrmiller@usgs.gov
Office of Surface Mining, Reclamation, and Enforcement
Maurice Banks, Safety & Health Manager
1951 Constitution Ave, N.W.
Mailstop 334
Washington D.C. 20240-0001
202-208-2608; fax 202-219-3100; jbanks@osmre.gov
APPENDIX 2
FATALITIES, HOSPITALIZATIONS, AMPUTATIONS, LOSS OF AN EYE REPORT - BLM

INCIDENT #1- VEHICLE ROLLOVER
TOTAL NUMBER OF FATALITIES: 2
TOTAL NUMBER OF HOSPITALIZATIONS: 1

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<tr>
<td>☒ Fatality   ☒ Hospitalization  ☐ Amputation  ☐ Loss of an Eye</td>
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Was it work related? Yes ☒ No ☐

Number of employees injured: 1
Date of the Incident: July 10, 2016

Number of employee fatalities: 2
Time of the Incident: Approx. 1700 PDT

Description of workplace operations: Driving a UNIMOG fire vehicle while conducting fire operations on a paved road surface.

Description of the incident: Vehicle experienced a tire blow out and rolled off the road, killing the driver and passenger-side passenger, and injuring the middle seat passenger. The vehicle roof collapsed and did not protect the passengers from injury. The driver did not exceed the posted speed limit and employees were wearing seat belts.

Analysis of workplace cause: Tire condition may have affected the blowout.

Were corrective actions taken? Yes ☒ No ☐

If yes, please describe the actions taken: Investigation report is still pending; interim actions were taken to inspect vehicle tires.

Were programmatic changes made? Yes ☒ No ☐

If yes, please describe the changes made: Accident investigation report is still pending; programmatic changes will be made based on outcome of corrective action plan and serious accident investigation report recommendations. Likely, more specific criteria for tire inspection will be developed.
APPENDIX 2
FATALITIES, HOSPITALIZATIONS, AMPUTATIONS, LOSS OF AN EYE REPORT – BLM

INCIDENT #2 – MOTORCYCLE CRASH
TOTAL NUMBER OF FATALITIES: 1
TOTAL NUMBER OF HOSPITALIZATIONS: 0

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Was it work related?  Yes ☒ No □

Number of employees injured: 0  Date of the Incident: July 23, 2016
Number of employee fatalities: 1  Time of the Incident: Approx. 1050 MDT

Description of workplace operations: On his way to assist with search efforts for a missing elderly hiker.

Description of the incident: While driving his personally owned motorcycle on a paved road to the site of the SAR operations, the employee lost control of the motorcycle at a curve in the road, and struck a boat trailer being towed by a truck in the opposite lane. The employee was not exceeding the posted speed limit and wore appropriate PPE.

Analysis of workplace cause: Employee did not have proper training or supervision to conduct SAR operations.

Were corrective actions taken?  Yes ☒ No □

If yes, please describe the actions taken: Service First employee agreement will be amended to include more coordination between agency supervisors for employee training. Future employees will receive supervisory briefings on differences in agency’s policies.

Were programmatic changes made?  Yes ☒ No □

If yes, please describe the changes made: Corrective action plan is still pending approval, but recommendations will be shared as lessons learned.
APPENDIX 2
FATALITIES, HOSPITALIZATIONS, AMPUTATIONS, LOSS OF AN EYE REPORT - FWS

INCIDENT – VEHICLE OPERATION
TOTAL NUMBER OF FATALITIES: 1
TOTAL NUMBER OF HOSPITALIZATIONS: 0

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<th>Fatality, Hospitalization, or Other Reportable Event</th>
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<td>☒ Fatality ☐ Hospitalization ☐ Amputation ☐ Loss of an Eye</td>
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Was it work related? Yes ☒ No ☐

Number of employees injured: 0
Date of the Incident: April 29, 2016

Number of employee fatalities: 1
Time of the Incident: 1500 CDT

Description of workplace operations: Dump truck operating on refuge dirt road.

Description of the incident: Dump truck got stuck in the mud up to chassis while bed was in the raised position. Bed got stuck in raised position, would not lower. Operator attempted to lower bed, and bed fell on operator causing immediate fatality.

Analysis of workplace cause: Serious Accident Investigation Team dispatched, report is at present about to go before a Service Accident Review Board.

Were corrective actions taken? Yes ☒ No ☐

If yes, please describe the actions taken: Serious Accident Investigation Team (SAIT) dispatched, report is at present about to go before a FWS Service Accident Review Board. Report with recommendations is pending. Final report currently going through SAIT report process.

Were programmatic changes made? Yes ☒ No ☐

If yes, please describe the changes made: The report with recommendations is pending. The final report is currently going through the SAIT report process.
APPENDIX 2
FATALITIES, HOSPITALIZATIONS, AMPUTATIONS, LOSS OF AN EYE REPORT – NPS

INCIDENT – MOWING OPERATION
TOTAL NUMBER OF FATALITIES: 1
TOTAL NUMBER OF HOSPITALIZATIONS: 0

Fatality, Hospitalization, or Other Reportable Event
☒ Fatality  ☐ Hospitalization  ☐ Amputation  ☐ Loss of an Eye

Was it work related? Yes ☒ No ☐

Number of employees injured: 0  Date of the Incident: August 26, 2016
Number of employee fatalities: 1  Time of the Incident: 1120 EDT

Description of workplace operations: Seasonal maintenance worker conducting roadside mowing operations.

Description of the incident: An employee at Cumberland Gap National Historical Park died when the zero-turn mower he was operating entered the adjoining roadway and was struck by a passing vehicle. The mower was equipped with a roll-over protection system. However, the employee was not wearing his seatbelt at the time of the incident. The force of the impact forced the mower off the roadway and into a nearby tree.

Analysis of workplace cause: Finalization of the investigation report is still pending. However, the lack of proper training, failure to implement standard operating procedures, and not using the installed seat belt have all been identified as factors in this incident.

Were corrective actions taken? Yes ☒ No ☐
If yes, please describe the actions taken: All mowing operations at the park were immediately suspended. All workers were retrained and all mowing-related policies and procedures were reviewed and updated. Additional corrective actions are pending the final outcome of the investigation.

Were programmatic changes made? Yes ☒ No ☐
If yes, please describe the changes made: A national-level safety guide for mowing operations is being developed and is expected to be released in FY 2017.
APPENDIX 2
FATALITIES, HOSPITALIZATIONS, AMPUTATIONS, LOSS OF AN EYE REPORT - BIA

Northwest Region
Motor Vehicle Operation
Total number of fatalities: 1
Total number of hospitalizations: 0

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Was it work related? Yes ☒ No ☐

Number of employees injured: 0  Date of the Incident: 7/12/2016
Number of employee fatalities: 1  Time of the Incident: 1338

Description of workplace operations: Irrigation ditch rider was killed in a rollover motor vehicle accident. Investigation was conducted and is ongoing.

Description of the incident: Motor vehicle accident

Analysis of workplace cause: To be determined

Were corrective actions taken? Yes ☐ No ☒

If yes, please describe the actions taken: To be determined

Were programmatic changes made? Yes ☐ No ☒

If yes, please describe the changes made: To be determined
### MIDWEST REGION

**Wildland Fire Assignment**

**Total number of fatalities:** 2  
**Total number of hospitalizations:** 9

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Was it work related? Yes ☒ No ☐

Number of employees injured: 9  
**Date of the Incident:** 08/27/2016

Number of employee fatalities: 2  
**Time of the Incident:** 1500 hours

Description of workplace operations: Enroute to a fire.

Description of the incident: While driving to the Beartown fire incident a vehicle rollover accident occurred resulting in 2 fatalities and 9 hospitalizations. Nature and cause of accident is currently under investigation. Standard Operating Procedures are being evaluated however and changes will need to await investigation finalization.

Analysis of workplace cause: To be determined. Litigation in progress.

Were corrective actions taken? Yes ☒ No ☐

If yes, please describe the actions taken: Business operation changes have been proposed however due to ongoing court dates no changes made until those are completed.

Were programmatic changes made? Yes ☒ No ☐

If yes, please describe the changes made: Same as above.
### Navajo Region

**Wildland Firefighting**

Total number of fatalities: **0**

Total number of hospitalizations: **6**

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<td>☐ Loss of an Eye</td>
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Was it work related? Yes ☒ No ☐

Number of employees injured: **6**

Date of the Incident: **06/28/2016**

Number of employee fatalities: **0**

Time of the Incident: **1450**

Description of workplace operations: Wildland Firefighting, Cedar Creek Fire, Show Low, Arizona

Description of the incident: Six firefighters were working on a section of uncontained fire line on the west side of the Cedar Fire. There was a sudden and unexpected change in the fire around 2:30 p.m. along a section of uncontained fire line. A large fire whirl formed near six members of the Navajo Interagency Hotshot Crew (IHC), entrapping them. All six firefighters who deployed their shelters were safe as of the next day, with no serious injuries.

Analysis of workplace cause: According to the National Wildfire Coordinating Group Terminology Glossary, a fire whirl is a spinning vortex column of ascending hot air and gases rising from a fire and carrying aloft smoke, debris, and flame. Fire whirls may range in size from less than one foot to over 500 feet in diameter and have the intensity of a small tornado.

Were corrective actions taken? Yes ☒ No ☐

If yes, please describe the actions taken: This is our standard operating procedure from the Department of the Interior... any time a serious event such as a shelter deployment occurs.

Were programmatic changes made? Yes ☒ No ☐

If yes, please describe the changes made: Examinations of the unexpected details of fire behavior, decisions made on the fire line, and the strategy and tactics being used on the Cedar Fire resulted in lessons learned.
APPENDIX 2
FATALITIES, HOSPITALIZATIONS, AMPUTATIONS, LOSS OF AN EYE REPORT – BIA

Western Region #1
Maintenance Operation
Total number of fatalities: 0
Total number of hospitalizations: 1

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<td>☒ Hospitalization</td>
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<td>☐ Amputation ☐ Loss of an Eye</td>
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Was it work related? Yes ☒ No ☐

Number of employees injured: 1

Date of the Incident: 09/09/2016

Number of employee fatalities: 0

Time of the Incident: Approx. 1100

Description of workplace operations: Keams Canyon Facility Management - Maintenance and Operations

Description of the incident: Re-injured cut finger while repairing sewer line

Analysis of workplace cause: Employee was working on replacing a four-inch sewer line at the housing unit in Keams Canyon Headquarters. Employee’s open wound came in contact with sewer water causing blood poisoning to occur.

Were corrective actions taken? Yes ☒ No ☐
If yes, please describe the actions taken: Employee was put on restricted duty until a physician releases him back to full duty.

Were programmatic changes made? Yes ☐ No ☒
If yes, please describe the changes made: After analysis of the incident it was determined that no programmatic changes were necessary or required.
**Bureau of Indian Affairs –**

**APPENDIX 2**  
**Fatalities, Hospitalizations, Amputations, Loss of an Eye Report - BIA**

**Western Region #2**  
**Maintenance**  

*Total number of fatalities: 0*  
*Total number of hospitalizations: 1*

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Was it work related?  Yes ❏ No ☐

Number of employees injured: 1  
Date of the Incident: 11/04/2016

Number of employee fatalities: 0  
Time of the Incident: Approx. 1000 hours

Description of workplace operations: Employee was bitten by a spider. Spider species is unknown.

Description of the incident: Employee was working in Coolidge yard removing weeds, located in Coolidge, AZ.

Analysis of workplace cause: Employee was working among outside environmental work hazards (i.e. insects, weeds, vegetation, etc.)

Were corrective actions taken?  Yes ❏ No ☐

If yes, please describe the actions taken: Instructed employees to use better cover up and review your surroundings when working outside.

Were programmatic changes made?  Yes ❏ No ☐

If yes, please describe the changes made: Administrative changes were made to discontinue allowing employees to perform weed and landscaping duties. Determination of hiring a contractor for all future weed removal and landscaping projects was approved by management.
Appendix 4: Safety & Health Management System Self-evaluation

Attribute Rating System

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<td>The attribute needs major improvements.</td>
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<td>The attribute needs minor improvement.</td>
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<td>3</td>
<td>The attribute is highly effective.</td>
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<tr>
<td>NA*</td>
<td>The attribute is not applicable.</td>
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I. **Hazard Anticipation & Detection**

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

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The Department considers this SHMS attribute to be highly effective resulting from 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 that establish policy for workplace hazard surveys and action to mitigate exposure to unsafe conditions. The DOI Bureaus have appropriately trained and experienced employees conducting hazard surveys, including risk exposure assessments for hazardous chemicals. Serious hazards identified during an exposure assessment or through the 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.

Some Bureaus employ behavior based safety analysis. For example, USGS employs behavior based hazard analysis through operational, career series, project and personal hazard assessment tools. These analyses identify previously undetected hazards and increase job knowledge of those participating. Safety and health awareness is raised, communication between workers and supervisors is improved, and acceptance of safe work procedures are promoted.
2. Effective safety and health self-inspections are performed regularly.

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The Department considers this SHMS attribute to be highly effective resulting from DM Chapter 6, Inspections and Abatement that establishes policy for safety and health inspections and abatement action. Workplace inspections are conducted by trained and experienced employees. Hazards identified during an inspection are tracked and abated through internal corrective action plans. The Department finalized an Inspection and Abatement system (IAS) module for agency 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.

3. Effective surveillance of established hazard controls is conducted.

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The Department considers this SHMS attribute to be highly effective. Bureaus have trained and experienced employees that periodically conduct surveillance activities and self-inspections. Hazards identified during an inspection are tracked and abated through internal corrective action plans.

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

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The Department concludes this SHMS attribute needs minor improvement. Some bureaus need to implement more adequately internal policies that designate responsibilities for current and future planning activities involving changes in facilities, equipment, materials, or processes to better detect potential hazards. Departmental policy establishes requirements expected to produce detection of potential hazards, including hazardous chemicals, associated with planned or anticipated changes in the work locations.
5. **Safety Data Sheets are used to reveal potential hazards associated with chemical products in the workplace.**

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The Department considers this SHMS attribute to be highly effective. Self-assessment reports indicate 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 process of detecting workplace hazards associated with chemical products is part of the exposure assessment process as described in section I (1). Any deficiency resulting from self-assessments are expected to be tracked until corrected or appropriately scheduled for correction according to the unit’s internal corrective action plan.

II. **HAZARD PREVENTION & CONTROL**

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicated engineering methods to eliminate or control workplace hazards are implemented when the organization can economically do so. DOI employs a “Hierarchy of Controls” policy expected to control identified hazards. Interim control measures are required until engineering controls are in place. For example, when Bureaus determine the way hazards are to be reduced or eliminated for 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 chemicals with less harmful materials.

More specifically, DOI has adopted a Risk Assessment System that is to be used by the Bureaus for determining the priority for hazard abatement activities. 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.
7. **Effective safety and health rules are in place.**

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicated a need to improve communication of both formal and informal safety and health workplace policies throughout the agency. The Department codified, through its DM process, its occupational safety and health program. DOI policy communicates the value placed on occupational safety and health (OSH) throughout the agency and empowers management to make sound decisions affecting all safety and health matters in the workplace. OSH policies cover workplace conditions, operations, and employees. DOI expects that this policy is communicated to employees at all levels, as well as to contractors and visitors, so that everyone throughout the agency understands the priority safety and health takes in relation to other organizational values.

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicated a need to improve formal 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. Specific examples include lockout/tagout and confined space.

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

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The Department considers this SHMS attribute to be highly effective. Self-assessment reports validate DOI’s implemented Risk Assessment System (RAS) is used throughout the agency for determining the priority for hazard abatement activities. In addition, and complementary to the RAS use, DOI created and implemented the Inspection and Abatement System (IAS) database that provides an effective inspection and hazard tracking tool for agency-wide use. The IAS database affords collateral duty and full-time safety
staff the ability to monitor corrective action status and to update the system, at least every 90 days, until identified hazards are mitigated. Most importantly, IAS sends monthly automated emails to management on the status of open findings.

III. PLANNING & EVALUATION

10. Hazard incidence data are effectively analyzed.

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need to improve the quality and analysis of hazard incidence data. With few exceptions, most bureaus do not have dedicated data analytic specialists to perform deep-dive data analysis. With some analytic limitations, DOI’s Safety Management Information System (SMIS) provides data that can be analyzed to enumerate hazard types, to detect time trends and spatial patterns, and to determine proportional distributions among types of agency operations and personnel. The bureaus conduct internal data analyses but acknowledge there is a need to improve data quality and analytics capabilities using a more holistic department-wide solution. As such, strategic improvements are underway to provide improved data quality and better analytics capabilities within the Safety Management Information System.

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

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The Department considers this SHMS attribute to be highly effective. Self-assessment reporting indicate Bureau action plans have been established. At the headquarters level, the DOI OSH program directorate has a strategic plan that establishes strategies to meet OSH objectives. Periodic reports are made which identify progress towards the objectives as well as potential impediments or setbacks. 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.
12. **A review of the overall safety and health management system is conducted at least annually.**

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The Department considers this SHMS attribute to be highly effective based on Bureau self-assessment reports and that the Department has a safety and occupational health evaluation program in place. At the end of CY 2014, all DOI Bureaus had received a baseline evaluation. In CY 2015, the second round of program evaluations began. To date, the second round of program evaluations showed overall marked improvements as compared to the previous round of 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.**

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need to improve the way we communicate safety and health program responsibilities for the various safety and health tasks within the organization. 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.

DOI recognizes that ownership of the safety and health program lies with employees and leadership 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 and healthful. 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.

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need to improve the training for collateral duty safety officers (CDSO) throughout the agency. Based on safety program evaluations and Bureau self-reporting, with a few outstanding exceptions, most CDSOs have not received effective skills training to perform their respective duties. The requirements contained within the DOI *Safety and Health Training, Technical Skills and Abilities for Collateral Duty and Full Time Safety Personnel* handbook establish recommended training policy for collateral duty and full-time safety and health staff should be used to improve CDSO knowledge and skills to perform assigned duties. In addition, the Department is currently creating a new CDSO training course to improve a CDSO’s knowledge, skills, and abilities to be effective in performance of their assigned safety duties.

IA continues to struggle with assuring that full-time Safety staff and CDSOs are trained and competent to perform assigned duties. The Bureau reports that of the five full-time safety managers at the regional level, one has the knowledge and skills to manage their respective programs. The remaining regional safety staff have yet to obtain the necessary basic training or skill sets to develop, implement, and administer their respective safety and health programs. BIE has recently hired a full-time safety manager and is in the process of hiring additional trained Safety professionals to manage the Bureau’s safety program. 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” are mandated by policy for full-time safety and health staff. The Bureau utilizes a variety of resources to meet the 24-hour training requirement by relying on trade organizations such as the American Industrial Hygiene Association and the American Society of Safety Engineers as well as hosting local training opportunities in specialized safety and health topics.
15. **Individuals with assigned safety and health responsibilities have the authority to perform their duties.**

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The Department considers this SHMS attribute to be highly effective based on Bureau self-assessment reports. 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 to obligate resources.

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

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The Department concludes this SHMS attribute needs minor improvement based on reported self-assessments. Interior continues to operate in an environment of constrained resources. Resources are prioritized based upon the most critical health and safety issues. For the most part, DOI and Bureau managers support effective operation of the safety and health management system by allocating needed resources even though many program budgets have been reduced due to on-going constraints.

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need to develop performance metrics to better track and promote safety and health program performance. Without metrics to validate performance, DOI policies are only expected to promote the performance of safety and health responsibilities.
V. **SAFETY & HEALTH TRAINING**

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate the need to improve employee safety and health training. The DOI and Bureaus need to determine the most appropriate method and sources to meet employee training needs, assure delivery of the training in a timely manner, and evaluate the effectiveness of the training provided. The DOI Learning Management System, DOI Learn, enables employees to receive safety and health training. The DOI Learn training courses can provide employees the knowledge to perform their assigned safety and health responsibilities.

In BLM, for example, DOI Learn facilitates the ability for employees and supervisors to receive some safety training (Hazard Communication, Defensive Driver Training, Safety for Supervisors, etc.). However, employee overview training for some safety and occupational health programs (i.e., hearing loss prevention, confined space entry, lock out/tag out) may not have been accomplished across all offices where needed. Job-specific specialized safety training (such as watercraft safety or BLM off-highway vehicle use) may not have been made available due to a lack of expertise within local regions and offices.

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need to improve new employee orientation (NEO) training. DOI employees can take DOI LEARN orientation courses supplemented with local supervisor safety orientation training that is location, job, and activity specific. However, orientation training does not always occur when new employees begin work with the agency, or when employees change job duties where new hazards are introduced. Proactive Departmental actions to improve this deficiency include creating training guidelines and a standardized checklist to assist with safety and occupational health topics for review during orientations.
20. **Supervisors receive training that covers the supervisory aspects of their safety and health responsibilities.**

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate the need to assure supervisors receive training that covers the supervisory aspects of their safety and health responsibilities. DOI LEARN courses have been created to provide supervisors with training on their safety and health program responsibilities. Within BLM, standardized training for supervisory safety skills is available on-line through DOI Learn and classroom training sources are recommended during compliance reviews. However, since this training is required only once in a manager’s career, some managers do not recall learned content from their training, especially if it was completed many years back. In addition, employees who serve as supervisors or managers in an “acting” capacity may not have completed this training.

Proactive initiatives to improve this deficiency by BOR resulted in the creation of a comprehensive safety training course for supervisors that each of its Regions are encouraged to use to train supervisors in safety and health program responsibilities.

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. Supervisors are provided a safety program overview in Leadership and Supervisory 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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The Department considers this SHMS attribute to be highly effective based on Bureau self-assessment reporting. In accordance with DOI DM 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, its national policy for safety and occupational health programs 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. State directors and most district managers have developed a management safety policy to promote safety and occupational health practices within their areas of responsibility. Internal interviews conducted during compliance reviews indicated that supervisors and managers communicate their expectations for health and safety and that they support safety and health workplace initiatives.

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. 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.

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

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The Department considers this SHMS attribute to be highly effective based on Bureau self-assessment reporting. Throughout the DOI, with few exceptions, 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 needs and circumstances of each Bureau throughout the Department.
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 Bureau assigned full time staff to each Regional Director, who are supported by the Office of Management Services OSH staff. The Bureau continues to encourage and fund professional development and training opportunities to expand their knowledge and skills.

The BLM national safety office is often consulted to assist with selection of state safety managers. State safety managers are often 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. However, long-term vacancies exist for some district safety manager positions and some district safety manager positions were filled with HAZMAT-trained staff when positions were combined with safety. Where safety staff vacancies existed in 2016, managers turned to the next higher level of safety support within the bureau (e.g., Regional or National safety office) to provide answers to their questions regarding safety issues.

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

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The Department considers this SHMS attribute to be highly effective based on Bureau self-assessment reporting. DOI and Bureau OSH leadership create the authority and responsibility necessary for personnel to carry out their assigned safety and health responsibilities effectively while furthering support of the SHMS.

In BLM, CDSOs are appointed in writing and their orders provide them the authority to carry out assigned duties. Safety and health staff are hired with authority to carry out assigned duties which are reflected in their position descriptions. While safety staff does not have line authority, employees in these positions may report directly to their senior official for safety issues, if necessary. Annual action plans, which identify safety goals and activities, are reviewed and approved by management teams so they are aware of who has the responsibility and authority in their organization to perform these functions. Safety committees at all levels within the Bureau have charters to identify their purpose and authority. Compliance reviews indicate that managers are supportive of the safety and occupational health program in their offices.

Subject matter experts from BOR’s Safety Office, as well as those from DOI, found that managers are provided adequate resources to support the Safety Program. A DOI evaluation of Reclamation’s Safety Program found that 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. BOR’s overall SOH Policy clearly establishes the delegation of Safety authority at all levels within the organization.

Safety managers have the authority to conduct safety and health inspections at both Indian Affairs 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.

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need for an increase in safety program resources. Agency resources are limited and many program budgets have been reduced due to constraints. Budget allocations are based on prioritized needs.

Within BLM, many vacancies exist across BLM in 2016, including safety managers. In some offices, safety responsibilities were delegated to untrained CDSOs or HAZMAT coordinators without consideration of workforce risks where full time safety positions were cut or lapsed. Funding for safety awards programs is mostly non-existent. Compliance reviews indicated that funding is adequate to provide local safety training for employees if it does not involve travel. Funding is allocated to provide for occupational health screening where it has been indicated to be necessary based on 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.

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, duty stations allocate 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 ongoing effort to centralize compensation at IA; however, DSRM lacks the resources to fund the position of an IA worker’s compensation manager as required by DOI policy. In addition, IA is tasked with providing safety program support to BIE which increases their workload. IA 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 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.

Based on USGS internal safety program reviews to determine the best organizational and funding structure to support a comprehensive and effective safety program, the Bureau DASHO, in collaboration with the Executive Leadership Team, increased the number of FTEs and associated funding by approximately 20 percent. Not only were Health Physicist positions created to provide radiation safety program support, but specialized programs were also enhanced to match the risk—with aviation, watercraft, and dive safety program managers converted from 50% to full time, supplemented by geographic specialized manager funding. Whenever a safety or health need is identified, the DASHO has secured funding to ensure program implementation.

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need to improve manager support for safety and health training, to include increasing travel funding for needed non-local courses. With a few exceptions, travel funding restrictions impact the ability for some safety staff to meet core competencies when required safety training is not locally available.

In BLM, basic safety training that does not involve overnight travel (i.e., Defensive Driving, Fire Extinguisher Training, Bear Awareness, 1st Aid/CPR/AED, ATV/UTV and 4x4 Vehicle Safety, and Evacuation training) is provided for employees. A proactive
measure taken by the DASHO in support of training is the 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 Headquarters’ 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 all employees through DOI-Learn, not all managers at all levels have encouraged or implemented the plan. Other regional managers do support other types of safety and health training put on or sponsored by the safety manager (e.g., office safety, Hazard Communication, lifting, etc.); however, these managers do not initiate required training on their own.

The USGS 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 employees, supervisors, and managers. The USGS provided an estimated 6,000 hours of training, completed through online sources in FY 2016 in addition to instruction provided by supervisors specific to the employee job and local work environment.

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

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The Department considers this SHMS attribute to be highly effective based on Bureau self-assessment reporting. DOI top management is engaged at appropriate levels and familiar with the safety and health planning and evaluation efforts undertaken by the organization. As illustrated by the Bureau reports, some top managers participate in planning and evaluation activities or simply receive and review reports, and make decisions concerning recommendations.

Within BLM, compliance reviews of all national-level safety and occupational health reports are reviewed by the DASHO and transmitted to the senior manager in each state/center. Corrective action plans for deficiencies noted in the reports are transmitted through senior managers back to the DASHO. Senior managers in each state are kept
apprised of facility conditions through correspondence from the CASHE program manager. State level annual action plans are discussed with management teams and the national level strategic goals are approved by the DASHO. At the local level, management teams are engaged with safety staff to ensure tracking and abatement of deficiencies related to inspections or employee reports of hazards. In addition, management team members participate on local safety committees.

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, BOR created 21 Safety Action Plan (SAP) teams to address DOI’s findings and recommendations. This SAP effort was overseen by Reclamation’s DASHO, with each of the 21 SAP teams led by an executive sponsor at the Regional Director level. In accordance with ANSI Z-10 principles, it is BOR’s policy through SAF P01 to have all Safety staff report directly to leadership at their level (e.g. Regional Director, Area Office Manager, etc.).

Top management at FWS HQ, regions, and duty stations are involved in the planning and evaluation of safety and health performance: safety funding including travel, evaluation briefs, evaluation reports, evaluation corrective action plans, future planning and evaluation.

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.

The USGS Executive Leadership Team (ELT) is provided periodic briefings on safety and health topics and the DASHO brings issues that need attention to the ELT 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 the internal website.
VII. **EMPLOYEE PARTICIPATION**

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need to improve the methods used to engage employees in safety and health issues.

DOI and Bureau OSH policies dictate, effective processes to involve employees in safety and health issues. These processes involve the solicitation, receipt, and acknowledgement of employee input and are known, trusted, and used by employees to provide input regarding safety and health issues. Various methods have been developed throughout the agency to engage employees where safety and health issues are discussed.

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a lack of involvement by employees in the organizations decision making process in regard to the allocation of safety and health resources. Employee involvement in organizational decision making should include opportunities for soliciting thoughts, suggestions, concerns, objections, or support from employees before decisions are made.

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.

In BLM, decisions for allocation of funding for safety resources are generally made at the management team level in each office, 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. These interviews assist the SME evaluation team in determining whether 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 regarding 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.

IA employees generally do not participate in the allocation of safety and health resource decision-making.

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

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a lack of employee involvement in organizational decision making in regard to training decisions affecting their safety and health. A recurring concern within some bureaus is the ability to procure funding to travel to attend training outside the local work unit.
30. Employees participate in the evaluation of safety and health performance.

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The Department concludes this SHMS attribute needs minor improvement. Self-assessments indicate a need to improve employees’ active engagement in the evaluation of organizational safety and health performance.