

**Department of Labor**

**Occupational Safety and Health Administration  
Washington, D.C. 20210**



**Reply to the Attention of:**

OSHA Instruction FAP 2.1B

**JUN 19 1989**

Office of Federal Agency Programs

SUBJECT: Evaluation of Federal Agency Occupational Safety and Health Programs

- A. Purpose. This instruction transmits the Occupational Safety and Health Program Evaluation Workbook for Agency field establishments, the Workplace Survey Questions, and the Guidelines for Establishment valuation Reports.
- B. Scope. This instruction applies OSHA-wide.
- C. References. The following references are applicable for this instruction:
  - 1. The Occupational Safety and Health Act, Section 19.
  - 2. Executive Order (E.O.) 12196, Occupational Safety and Health Programs for Federal Employees Section 1-401(h).
  - 3. Basic Program Elements for Federal Employee Occupational Safety and Health Programs (29 CFR Part 1960.80).
  - 4. Chapter XIII of the Field Operations Manual (FOM).
- D. Cancellation. OSHA Instruction FAP-2.1A, September 11, 1985, is canceled.
- E. Action. OSHA National Office Director, regional Administrators shall ensure that the Workbook and survey Questions (see Appendices A and B) and the Guidelines for Establishment Evaluation Reports (see Appendix C) are employed in conducting evaluations of Federal agencies' occupational safety and health programs, as set forth in the Field Operations Manual (FOM), Chapter XIII. Regional Administrators shall ensure that establishment evaluation reports follow the sample format provided.

Patricia K. Clark, Acting Director  
Directorate of Compliance Programs

Distribution: National, Regional Offices

**JUN 19 1989**

APPENDIX A

OCCUPATIONAL SAFETY AND HEALTH

PROGRAM EVALUATION WORKBOOK

WORKSITE QUESTIONNAIRE

---

AGENCY

---

COMPONENT/OPERATION

---

ESTABLISHMENT/INSTALLATION

---

EVALUATOR

---

DATE

**JUN 19 1989**

Office of Federal Agency Programs

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

	1.0 TOP MANAGEMENT SUPPORT: QUESTIONS ADDRESS HOW TOP MANAGEMENT DEMONSTRATES ITS SUPPORT FOR THE PROGRAM.
	1.1 <u>Policy Statements</u>
1960.6(b)(1)	a. Have policy statements been received from the agency head or other top managers? (Attach copies.)
	b. Has the facility manager issued any policy statements? (Attach copies.)
1960.6(b)(2)	*c. Are supervisors aware of any policy statements? From whom?
1960.6(b)(2)	d. Are employees aware of any policy statements? From whom?
	1.2 <u>Program Documentation</u>
1960.6(b) 1960.12(b)	a. Has the agency transmitted <u>written</u> program documentation to the facility?
1960.12(a)	b. Has the facility developed additional program documentation? If so, is it consistent with 29 CFR Part 1960?
1960.12(a)	*c. Are employees aware of availability of standards, agency's program requirements, etc.
	1.3 <u>Personal Participation</u>
1960.6(b)(1)	Does the facility manager participate in the program (Give examples: accompanies inspectors, issues memos, attends safety meetings, etc.)
	1.4 <u>Accountability</u>
1960.9 1960.11	*a. Are managers and supervisors evaluated on their occupational safety and health performance? Is it a critical element? Has merit pay ever been denied for occupational safety and health reasons?
1960.9	*b. Do supervisors correct hazards and

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Office of Federal Agency Programs

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

## PROGRAM ELEMENTS AND EVALUATION FACTORS

1960.11	enforce safety and health standards, rules, and regulations in the workplace? For example, are employees wearing PPE? Are guards on machines in place? (Give examples)
1960.6(a)	1.5 <u>Resources</u>
1960.7(c)	a. Have sufficient staff been provided to administer the program? (Findings should list number of OSH staff by job titles.)
1960.2(s); 6(a), (c); .25(a)	*b. Are safety and health staff qualified for their responsibilities?
1960.2(s); 6(a), (c); .25(a)	c. Have other resources been used? (NIOSH, contractor, etc.)
1960.7(c)	*d. Have adequate financial resources been provided to abate hazardous conditions? Which abatements were delayed beyond 6 months? Are any abatement dates out standing? (Explain)
1960.7(c)	*e. Is adequate and appropriate personal protective equipment provided at the facility?
	2.0 PROGRAM PLANNING: QUESTIONS ADDRESS THE EXTENT ID WHICH GOALS AND OBJECTIVES ARE BASED ON DATA ANALYSIS.
	2.3 <u>Goals and Objectives</u>
1960.6(b)(4)	a. Does tie facility have clear, measure able, goals and objectives?
1960.6(b)(4) 1960.66(c)	b. If so, are they related to problems identified through the management information system?
1960.11 (optional)	c. Are specific objectives a part of supervisors's or manager's performance standards?
1960.11 (optional)	d. Do headquarters objectives become facility objectives? Does headquarters review/approve facility objectives?

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

E.O. 1-231(j)  
1960.66(b)(6)&(c)

e. Has the facility conducted any special activities based on injury/illness causal factors? (Examples: fact sheets, paycheck stuffers, posters, inspections, training) Were they based on direction from agency headquarters?

2.1 Management Information System

1960.66(a)  
1960.56(c)

a. Does the facility supply injury/illness statistics to agency headquarters? If so, does headquarters provide analysis and feedback?

1960.66(a)  
optional

b. Are injury/illness-reports compared to OWCP claims?

3.0 PROGRAM IMPLEMENTATION QUESTIONS ADDRESS HOW THE PROGRAM CONFORMS TO 29 CFR PART 1960, AND HOW IT IS IMPLEMENTED THROUGHOUT THE AGENCY

3.1 Employee Rights and Involvement

Act, Section 19(a)

\*a. Does the agency consult with employee representatives concerning the program? (Examples.)

1960.12(c)

\*b. Is a poster with the DOL core text displayed?

1960.12(c)

\*c. Can employees easily review the Act, Executive Order 12196, 29 CFR Part 1960, and the agency's program?

E.O. 1-201(h)  
1960.28(c)

d. Are there written procedures for employees to report hazards anonymously?

\*e. Are employees aware of the procedures?

1960.28(d)(4)

\*f. Where employees have reported hazards, were they notified of actions taken within required time frames?

E.O. 1-2D1(h)  
1960.28(d)(3)

\*g. Are reports handled within required timeframes?

1960.28(d)

h. Is a log of employee reports maintained?

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Office of Federal Agency Programs

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

- |                                         |                                                                                                                                                              |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1960.10(d)                              | *i. Are employees authorized official time to participate in the OSH program? (Examples )                                                                    |
| 1960.12(e)                              | j. Is employee awareness of occupational safety and health promoted through the agency's normal information channels? (Newsletters, etc.) (Attach examples.) |
| Optional                                | k. Are employees involved through the use of incentive or other promotion programs?                                                                          |
| Optional                                | l. Do collective bargaining agreements include safety and health provisions?                                                                                 |
| Optional                                | *m. Are disciplinary procedures in effect for failure to follow established safe operating procedures?                                                       |
| E.O. 1-201(i)<br>1960.27(a) and (b)     | *n. Do employee representatives accompany inspectors during inspections?                                                                                     |
|                                         | 3.2 <u>Reprisal Policy and Procedures</u>                                                                                                                    |
| E.O. 1-201 (f)<br>1960.46(a)            | a. Has the agency issued a reprisal policy and procedures?                                                                                                   |
| E.O. 1-201 (f)<br>1960.46(a)<br>1960.47 | *b. Are employees aware that they are protected from reprisal for exercising their occupational safety and health rights?                                    |
|                                         | c. Who investigates allegations of reprisal?                                                                                                                 |
|                                         | d. What is the highest authority to which a reprisal allegation can be appealed?                                                                             |
|                                         | e. Are committees, employee representatives, and the appropriate safety and health managers notified of allegations of reprisal?                             |
| 1960.46(a)<br>1960.47                   | f. How many allegations of reprisal have there been at this facility?                                                                                        |
|                                         | g. What was the disposition of those cases?                                                                                                                  |

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

OPTIONAL  
IF NOT CERTIFIED

h. Have any managers/supervisors been disciplined for taking reprisal actions?

3.2 Occupational Safety and Health Committees

a. Does the facility have a safety and health committee?

b. Who is on it?

c. Does it meet regularly?

d. Are minutes of meetings kept? (Attach minutes from last two meetings.)

e. Does the committee address substantive safety and health issues? (Examples.)

f. Are hazards eliminated as a result of committee activities?

IF CERTIFIED:  
1960.88 & 36(b)

a. Do certified committees have equal representation of management and employees?

1960.37 & 36(b)(1)

b. Are members appointed as required?

1960.37(d)

c. Is the chairperson elected by members?

1960.37(e)

d. Is there a regular meeting schedule?

1960.37(f)

e. Is adequate advance notice given to members?

1960.37(g)

f. Are minutes kept and distributed to members? (Attach copies from last two meetings.)

1960.39(9)

g. Do committees have access to all relevant information except that prohibited by law? (Accident investigation reports, injury/illness data, inspection reports, evaluations.)

(Optional)

3.4 Federal Safety and Health Councils

1960.85(a), .88(b)

a. Does the agency or facility encourage

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Office of Federal Agency Programs

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

- 1960.88(h) participation of management and employees in Federal Safety and Health Councils?
- b. Do management and employees share travel funds equally?
- 3.5 Training (IN ALL CASES: GIVE TITLES, CONTENT, LENGTH, NUMBER ATTENDING)
- 1960.54 a. What training has been provided to top managers on requirements of the agency program, the Act, Executive Order 12196, and 29 CFR Part 1960?
- 1960.55 \*b. What training has been provided to supervisors on:
- 1) The Act, Executive Order, and 29 CFR Part 1960?
  - 2) OSHA standards?
  - 3) Procedures for reporting and investigating allegations of reprisal?
  - 4) Procedures for reporting, evaluation, and abatement of hazards?
  - 5) Hazard recognition?
  - 6) Other? (describe)
- 1960.58 \*c. What training has been provided to collateral duty safety and health personnel on:
- 1) Hazard recognition?
  - 2) The use of OSHA standards?
  - 3) Procedures for reporting and investigating allegations of reprisal?
  - 4) The Act, Executive Order, and 29 CFR Part 1960?
  - 5) Other?

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

1960.58

- \*d. What training has been provided to (certified) committee members on:
- 1) Hazard recognition?
  - 2) The use of OSHA standards?
  - 3) Procedures for reporting and investigating allegations of reprisal?
  - 4) The Act, Executive Order, and 29 CFR Part 1960?

1960.59

- \*e. What training has been provided to employees on:
- 1) Hazards of their jobs?
  - 2) The agency's OSH program including rights and responsibilities?
  - 3) The proper use of personal protective equipment?
  - 4) Safe operating procedures?
- \*f. Have employee representatives received:
- 1) Introductory and specialized OSH courses?
  - 2) Training to assist in conducting inspections?

1960.56  
1960.57

- \*g. Have inspectors/safety specialists received training on standards, use of testing procedures, hazard recognition and abatement, data analysis, and preparation of reports?

Act, Sec 19(a )(3)  
E.O. 1-201(j)  
1960.67

3.6 Recordkeeping

1960.71(b)

- a. Is a log of injuries and illnesses maintained at the facility? (Attach copy from last two years)
- b. Is a summary posted for 30 days beginning

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

	<p>within 45 days of the close of the fiscal year?</p>
1960.68	<p>c. Is a supplementary record of injuries and illnesses maintained? Completed in 6 working days?</p> <p>d. Are injury/illness reports compared to OWCP claims filed?</p> <p>e. Are OSHA-required cedex completed on compensation forms?</p>
E.O. 1-201(g)	<p>3.7 <u>Inspections</u></p>
1960.25(c)	<p>a. Who conducts inspections of the facility and how often?</p>
1960.25(c)	<p>b. Has the facility identified high risk areas? (List.) Are they inspected more frequently?</p>
1960.25(a)	<p>c. Are inspectors qualified to recognize hazards for the workplaces involved?</p>
1960.29(b) 1960.70	<p>d. Are thorough investigations made of all occupational fatalities or accidents requiring hospitalization of five or more employees? Is DOL notified within 48 hours?</p>
1960.26(a)	<p>*e. Do inspectors review hazard reports, injury/illness records, previous inspection reports?</p>
1960.25(b)	<p>*f. Do inspectors question employees or supervisors privately?</p>
1960.25(a)	<p>*g. Are inspectors provided necessary equipment?</p>
1960.26(c)	<p>*h. Do inspectors issue Notices of Unsafe or Unhealthful Working Conditions? Are these posted for appropriate times?</p>
1960.27(a)	<p>*i. Do employee representatives accompany inspectors?</p>

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

1960.26(b)(6)	*j. Is a closing conference conducted with the official in charge and employee representatives?
	3.8 <u>Hazard Abatement</u>
1960.30(a)	a. Does the facility have written abatement procedures?
1960.30(c)	b. Are abatement dates set? Met within the specified time frames?
1960.30(d)	c. Does the facility follow required procedures when abatement cannot be achieved in normal time limits?
1960.30(b)	d. What are your procedures for tracking abatement?
E.O. 1-201(h)	e. Are imminent danger conditions abated immediately?
1960.26(b)(5)	f. How does the facility assure that private contractors do not expose Federal employees to unsafe conditions?
1960.34(a)(1)	g. Do you request preoccupancy inspections from GSA? If so, are the results acceptable?
1960.34(a)(5)	h. Are there written procedures to make written reports of unsafe/unhealthful conditions to other agencies, e.g. GSA, which are responsible for their correction?
1960.31(a)(5)	i. Have there been any reports of unsafe or unhealth conditions that were referred to GSA? If so, were they investigated?
1960.34(a)(8)	j. How does the facility coordinate with GSA to ensure that safety and health problems still outstanding are resolved prior to renegotiation of leases?
41 CFR Part 101-20	k. If the building is owned by GSA, has someone been designated as liaison with GSA?

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Reference: the Act;  
E.O. 12196; 29 CFR  
Part 1960

PROGRAM ELEMENTS AND EVALUATION FACTORS

1960.34(b)(4)

1. Has personal protective equipment been obtained from GSA?

1960.34(e)(3)

m. Have you encountered any safety problems with GSA cars?

3.9 Standards Compliance and Adoption

the Act, 19(a)  
E.O. 1-3D1(d)

a. Does the facility generally comply with OSHA standards? (How do deficiencies relate to the safety and health program: lack of inspections, training, funds, etc.)

1960.16  
1960.17

b. Are alternate or supplementary standards in use?

c. Were alternate standards approved by the Secretary?

4.0 PROGRAM EVALUATION: QUESTIONS ADDRESS HOW THOROUGHLY THE AGENCY CONDUCTS ITS OWN PROGRAM EVALUATIONS.

1960.70

a. Has the facility participated in an evaluation (not an inspection) conducted by agency headquarters?

(optional)

b. Does the facility receive feedback from agency headquarters about its performance.

\*Complete response needs information from workplace survey.

**JUN 19 1989**

APPENDIX B

WORKPLACE SURVEY QUESTIONS

During workplace surveys, safety specialists and industrial hygienists will review working conditions to determine if the facility complies with OSHA standards, and, if not, what the cause may be. (For example, lack of training, failure to conduct inspections, lack of funds for correction, etc.) Safety and health hazards should be pointed out to management and labor representatives, mentioned in the closing conference, and included in the Regional Office evaluation report, under item 5.0, Workplace Survey.

The attached questions have been supplied as a guide to safety specialists and industrial hygienists for their interviews of supervisors, employee representatives, and employees.

Findings from workplace surveys and interviews will be used to complete questions marked (\*) in the PROGRAM EVALUATION WORKBOOK FOR FIELD ESTABLISHMENTS.

**JUN 19 1989**

Office of Federal Agency Programs

INTERVIEW QUESTIONS

Question Number  
in Workbook

SUPERVISORS

- 1.1(c) Have you seen any policy statements on occupational safety and health? From whom?
- 1.4(a) Does your performance evaluation have an element for occupational safety and health? In what way does it measure your safety and health performance (i.e., reduction in injuries, training courses, etc.)
- 1.4(b) Do employees ever report unsafe or unhealthful conditions to you? how do you get the condition corrected?
- 1.5(e) Who selects your employees' personal protective equipment? Does it have to be approved by the safety office before it is purchased?
- 3.5(b) Have you received any safety and health training? When? From whom? What was the subject?

EMPLOYEE REPRESENTATIVES

- 1.1(d) Have you ever seen any policy statements on occupational safety and health? From whom?
- 1.5(e) What type of personal protective equipment are you issued? Do you feel you need any other type?
- 3.1(a) Does management consult with employee representatives about the occupational safety and health program?
- 3.1(n) Do employee representatives accompany inspectors during inspection? Do inspectors question employees privately?
- 3.5(f) Have you received any occupational safety and health training? When? From whom? What was the subject, and how long was the training?

EMPLOYEES

- 1.1(d) Have you ever seen any information about occupational safety and health at this facility? Where? What was it?
- 1.2(e)
- 3.1(c)

INTERVIEW QUESTIONC cont.

Question Number

**JUN 19 1989**

in Workbook

EMPLOYEES, cont.

- 3.2(f) Do you know of anyone who has gotten into trouble for making a safety or health complaint?
- 3.1(e) Do you know what you can do if you see an unsafe  
3.2(b) condition?
- 3.1(f) Have you ever reported a safety or health hazard? Who did you report it to? Was it taken care of? How long did it take?
- 3.5(e) Have you received any training about your agency's occupational safety and health program, or about the hazards of your job? When? Who gave it? What subjects were covered?

**JUN 19 1989**

APPENDIX C  
Sample Format for Establishment Evaluation  
Report

The establishment evaluation report should include a brief summary of not more than five pages of the findings of the four major evaluation elements, with an attachment consisting of answers to the questionnaire and hard copy documentation, as appropriate, to support the findings and recommendations given in the summary. The summary is intended to be a brief narrative on major program deficiencies or program strengths. It should include:

Opening and Closing Conference Information

- Include dates of opening and closing conferences.
- Include opening and closing conference attendees (names and titles).
- Include identification of sites visited.

Background

- Include a brief description of the agency's mission, and the establishment's involvement in the mission.
- Include employment numbers.
- Include, if appropriate, the scope of responsibility of the safety office with respect to number of facilities or geographic area covered.
- Include the organizational placement of the safety office.

Top Management Support

- Include major program strengths or deficiencies as documented in the evaluation finding contained in the attachment.

Program Planning

- Include major program strengths or deficiencies as documented in the evaluation findings contained in the attachment.

Program Implementation

- Include major program strengths or deficiencies as documented in the evaluation findings contained in the attachment.

Program Evaluation

- Include major program strengths or deficiencies as documented in the evaluation findings contained in the attachment.

**JUN 19 1989**

Recommendations

- List recommendations for improvement of all program deficiencies listed in the evaluation summary.

Attach the detailed evaluation findings and copies of appropriate program documentation obtained during the evaluation.

**JUN 19 1989**

Office of Federal Agency Programs

ATTACHMENT

PROGRAM ELEMENTS AND EVALUATION FACTORS

1.0 TOP MANAGEMENT SUPPORT: QUESTIONS ADDRESS HOW TOP MANAGEMENT DEMONSTRATES ITS SUPPORT FOR THE PROGRAM.

1.1 Policy Statements

- a. Have policy statements been received from the agency head or other top managers? (Attach copies)
- b. Has the facility manager issued any policy statements? (Attach copies)
- \*c. Are supervisors aware of any policy statements? From whom?
- \*d. Are employees aware of any policy statements? From whom?

1.2 Program Documentation

- a. Has the agency transmitted written program documentation to the facility?
- b. Has the facility developed additional program documentation? If so, is it consistent with 29 CFR Part 1960?
- \*c. Are employees aware of availability of standards, agency's program requirements, etc.?

1.3 Personal Participation

Does the facility manager participate in the program? (Give examples: accompanies inspectors, issues memos, attends safety meetings, etc.)

1.4 Accountability

- \*a. Are managers-and supervisors evaluated on their occupational safety and health performance? Is it a critical element? Has merit pay ever been denied for occupational safety and health reasons?
- \*b. Do supervisors correct hazards and enforce safety and health standards, rules, and regulations in the workplace? For example, are employees wearing PPE? Are guards on machines in place? (Give examples)

\*Complete response needs information from workplace survey.

**JUN 19 1989**

1.5 Resources

- a. Have sufficient staff been provided to administer the program?  
"Findings should list number of OSH staff by job titles.)
- \*b. Are safety and health staff qualified for their responsibilities?
- c. Have other resources been used? (NIOSH, contractor, etc.)
- \*d. Have adequate financial resources been provided to abate hazardous conditions? Which abatements were delayed beyond 6 months? Are any abatement dates outstanding? Explain.
- \*e. Is adequate and appropriate personal protective equipment provided at the facility?

2.0 PROGRAM PLANNING QUESTIONS ADDRESS THE EXTENT TO WHICH GOALS AND OBJECTIVES ARE BASED ON DATA ANALYSIS.

2.1 Goals and Objectives

- a. Does the facility have clear, measurable, goals and objectives?
- b. If so, are they related to problems identified through the management information system?
- c. Are specific objectives a part of supervisor's or manager's performance standards?
- d. Do headquarters objectives become facility objectives? Does headquarters review/approve facility objectives?
- e. Has the facility conducted any special activities based on injury/illness causal factors? (Examples: fact sheets, paycheck stuffers, posters, inspections, training) Were they based on direction from agency headquarters?

2.2 Management Information System

- a. Does the facility supply injury/illness statistics to agency headquarters? If so, does headquarters provide analysis and feedback?
- b. Are injury/illness reports compared to OWCP claims?

\*Complete response needs information from workplace survey.

**JUN 19 1989**

3.0 PROGRAM IMPLEMENTATION: QUESTIONS ADDRESS HOW THE PROGRAM CONFORMS TO 29 CFR PART 1960, AND HOW IT IS IMPLEMENTED THROUGHOUT THE AGENCY.

3.1 Employee Rights and Involvement

- \*a. Does the agency consult with employee representatives concerning the program? (Examples)
- \*b. Is a poster with the DOL core text displayed?
- \*c. Can employees easily review the Act, Executive Order 12196, 24 CFR Part 1960, and the agency's program?
  - d. Are there written procedures for employees to report hazards anonymously?
- \*e. Are employees aware of the procedures?
- \*f. Where employees have reported hazards, were they notified of actions taken within required time frames?
- \*g. Are reports handled within required timeframes?
  - h. Is a log of employee reports maintained?
- \*i. Are employees authorized official time to participate in the OSH program? (Examples)
  - j. Is employee awareness of occupational safety and health promoted through the agency's normal information channels? (Newsletters, etc.) (Attach examples)
  - k. Are employees involved through the use of incentive or other promotional programs?
  - l. Do collective bargaining agreements include safety and health provisions?
- \*m. Are disciplinary procedures in effect for failure to follow established safe operating procedures?
- \*n. Do employee representatives accompany inspectors during inspections?

3.2 Reprisal Policy and Procedures

- a. Has the agency issued a reprisal policy and procedures?
- \*b. Are employees aware that they are protected from reprisal for exercising their occupational safety and health rights.
  - c. Who investigates allegations of reprisal?

\*Complete response needs information from workplace survey.

**JUN 19 1989**

- d. What is the highest authority to which a reprisal allegation can be appealed?
- e. Are committees, employee representatives, and the appropriate safety and health managers notified of allegations of reprisal?
- f. How many allegations of reprisal have there been at this facility?
- g. What was the disposition of those cases?
- h. Have any managers/supervisors been disciplined for taking reprisal actions?

### 3.3 Occupational Safety and Health Committees

If Not Certified:

- a. Does the facility have a safety and health committee?
- b. Who is on it?
- c. Does it meet regularly?
- d. Are minutes of meetings kept?
- e. Does the committee address substantive safety and health issues? (Examples)
- f. Are hazards eliminated as a result of committee activities?

If Certified:

- a. Do certified committees have equal representation of management and employees?
- b. Are members appointed as required?
- c. Is the chairperson elected by members?
- d. Is there a regular meeting schedule?
- e. Is adequate advance notice given to members?
- f. Are minutes kept and distributed to members? (Attach copies from last two meetings.)
- g. Do committees have access to all relevant information except that prohibited by law? (Accident investigation reports, injury/illness data, inspection reports, evaluations)

### 3.4 Federal Safety and Health Councils

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Office of Federal Agency Programs

- a. Does the agency or facility encourage participation of management and employees in Federal Safety and Health Councils?
  - b. Do management and employees share travel funds equally?
- 3.5 Training (IN ALL CASES GIVE: TITLES, CONTENT, LENGTH, NUMBER ATTENDING)
- a. What training has been provided to top managers on requirements of the agency program, the Act, Executive Order 12196 and 29 CFR Part 1960?
  - \*b. What training has been provided to supervisors on:
    - 1) The Act, Executive Order, and 29 CFR Part 1960?
    - 2) OSHA standards?
    - 3) Procedures for reporting and investigating allegations of reprisal?
    - 4) Procedures for reporting, evaluation, and abatement of hazards?
    - 5) Hazard recognition?
    - 6) Other? (Describe)
  - \*c. Has training been provided to collateral duty safety and health personnel on:
    - 1) Hazard recognition?
    - 2) The use of OSHA standards?
    - 3) Procedures for reporting and investigating allegations of reprisal?
    - 4) The Act, Executive Order, and 29 CFR Part 1960?
    - 5) Other? (Describe)
  - \*d. Has training been provided to (certified) committee members on:
    - 1) Hazard recognition?
    - 2) The use of OSHA standards?
    - 3) Procedures for reporting and investigating allegations of reprisal?

\*Complete response needs information from workplace survey.

**JUN 19 1989**

- 4) The Act, Executive Order, and 29 CFR Part 1960?
- \*e. Has training been provided to employees on:
- 1) Hazards of the employees jobs?
  - 2) The agency's OSH program including rights and responsibilities?
  - 3) The proper use of personal protective equipment?
  - 4) Safe operating procedures?
- \*f. Have employee representatives received:
- 1) Introductory and specialized OSH courses?
  - 2) Training to assist in conducting inspections?
- \*g. Have inspectors/safety specialists received training on standards, use of testing procedures, hazard recognition and abatement data analysis, and preparation of reports?

3.6 Recordkeeping

- a. Is a log of injuries and illnesses maintained at the facility?  
(Attach copy from last two years)
- b. Is a summary posted for 30 days beginning within 45 days of the close of the fiscal year?
- c. Is a supplementary record of injuries and illnesses maintained? Completed in 6 working days?
- d. Are injury/illness reports compared to OWCP claims filed?
- e. Are OSHA-required codes completed on compensation forms?

\*Complete response needs information from workplace survey.

**JUN 19 1989**

3.7 Inspections

- a. Who conducts inspections of the facility, and how often?
- b. Has the facility identified high risk areas? (List) Are they inspected more frequently?
- c. Are inspectors qualified to recognize hazards for the workplaces involved?
- d. Are thorough investigations made of all fatalities or accidents requiring hospitalization of five or more employees? Is DOL notified within 48 hours?
- \*e. Do inspectors review hazard reports, injury/illness records, previous inspection reports?
- \*f. Do inspectors question employees or supervisors privately?
- \*g. Are inspectors provided necessary equipment?
- \*h. Do inspectors issue Notices of Unsafe or Unhealthy Working Conditions? Are these posted for appropriate times?
- \*i. Do employee representatives accompany inspectors?
- \*j. Is a closing conference conducted with the official in charge and employee representatives?

3.8 Hazard Abatement

- a. Does the facility have written abatement procedures?
- b. Are abatement dates set? Met within the specified time frames?
- c. Does the facility follow required procedures when abatement cannot be achieved in specified time limits?
- d. What are your procedures for tracking abatement?
- e. Are imminent danger conditions abated immediately?
- f. How does the facility assure that private contractors do not expose Federal employees to unsafe conditions?
- g. Do you request preoccupancy inspections from GSA? If so, are the results acceptable?
- h. Are there written procedures to make written reports of unsafe/unhealthy conditions to other agencies, e.g., GSA, which are responsible for their correction.

\*Complete response needs information from workplace survey.

**JUN 19 1989**

Office of Federal Agency Programs

- i. Have there been any reports of unsafe or unhealthful conditions that were referred to GSA? If so, were they investigated?
- j. How does the facility coordinate with GSA to ensure that safety and health problems still outstanding are resolved prior to renegotiation of leases?
- k. If the building is owned by GSA, has someone been designated as liaison with GSA?
- l. Has personal protective equipment been obtained from GSA?
- m. Have you encountered any safety problems the GSA cars?

3.9 Standards Compliance

- a. Does the facility generally comply with OSHA standards? (How do deficiencies relate to the safety and health program: lack of inspections, training, funds, etc.?)
- B. Are alternate or supplementary standards in use?
- c. Were alternate standards approved by the Secretary of Labor?

4.0 PROGRAM EVALUATION: QUESTIONS ASSESS HOW THOROUGHLY THE AGENCY CONDUCTS ITS Own PROGRAM EVALUATIONS.

- a. Has the facility participated in an evaluation (not an inspection) conducted by agency headquarters?
- b. Does the facility receive feedback from agency headquarters about its performance?

\*Complete response needs information from workplace survey.