

CHAPTER 10: PROGRAM EVALUATION (PE)

Chapter Table of Contents

1 OVERVIEW	PE 10-1
Objective	PE 10-1
Differences Among Evaluations, Inspections, and Audits	PE 10-1
2 WHO SHOULD PERFORM THE EVALUATION?	PE 10-2
3 WHAT PROGRAM ELEMENTS SHOULD BE EVALUATED?	PE 10-2
Management Leadership and Employee Involvement	PE 10-3
Worksite Analysis	PE 10-3
Hazard Prevention and Control	PE 10-4
Safety and Health Training	PE 10-4
4 EVALUATION APPROACH	PE 10-4
Document Review	PE 10-4
Employee Interviews	PE 10-5
Review of Site Conditions	PE 10-5
5 EVALUATING PROGRAM GOALS, OBJECTIVES, AND ACTIVITIES	PE 10-5
Sample Objective	PE 10-5
Focus of the Activity Evaluation	PE 10-6
Activities and Procedures	PE 10-6
Sample Objective	PE 10-7
Evaluating Objectives	PE 10-7
Sample Goal	PE 10-8
Evaluating Goals	PE 10-8
6 EVALUATION JUDGMENTS	PE 10-9
Sample Evaluation Questions	PE 10-9
OSHA Baseline Questionnaire	PE 10-9
Sample Evaluation Instructions	PE 10-9
Small Business Administration Checklist	PE 10-9
7 HOW TO USE THE EVALUATION	PE 10-9
8 AGENCY ANNUAL REPORTS	PE 10-10
APPENDICES	
Appendix 10-1: FEOSH Program Evaluation Checklist	PE 10-11
Appendix 10-2: Sample Evaluation Questions for Employees and Managers	PE 10-17
Appendix 10-3: Sample Evaluation for Routine Inspections	PE 10-22

CHAPTER 10: PROGRAM EVALUATION

1. OVERVIEW

This chapter defines a safety and health program evaluation and describes what should be evaluated, who should perform the evaluation, how the evaluation should be conducted, and how to use the results.

Your safety and health program is in place when the following are realized:

- Your program goals have been achieved through well-defined objectives.
- Activities, supported by written procedures, have been successful in accomplishing your program's objectives.
- Roles have been defined and responsibilities clearly assigned.
- Management has provided you with the necessary authority and resources.
- Employees at all levels have received training covering the program and their respective roles and responsibilities, and they understand the consequences of failing to follow the training received.

As a safety and health professional, where do you now direct your efforts if your program is going to grow and improve? What are your responsibilities from this point on?

Objective

The answer to these questions is program evaluation. Webster defines the word evaluate as "to determine or fix the value of" or "to determine the significance or worth of, usually by careful appraisal and study." When you apply this definition to a program evaluation, you as a safety and health professional are seeking to find out just how well the program is working.

**Differences
Among
Evaluations,
Inspections,
and Audits**

What exactly is a program evaluation, and how does it compare with an inspection or audit? Inspections and audits help to measure the effectiveness of a safety and health program. Both are important activities in helping to maintain the integrity of a safety and health program. However, they do not constitute a program evaluation. The following will further explain the difference among inspections, audits, and program evaluations.

There are two main objectives in conducting an inspection or audit. The first objective is to discover conditions and work practices that may lead to occupational illnesses and injuries by using specific and methodical inspection procedures. Inspections help gain insight on facility operations, processes, and individual jobs in order to eliminate or control workplace hazards.

The second objective is to concentrate on specific program activities in an effort to determine if program objectives are being met by using auditing techniques that identify specific program deficiencies.

A good example that may help clarify the difference between inspections, audits, and program evaluations is the following. Suppose during an inspection you were assessing employee participation by looking at the activities of the safety committee. Some typical questions you might ask are

CHAPTER 10: PROGRAM EVALUATION

- How often did the safety committee meet?
- Did they meet at the specified intervals?
- Did most members attend the committee meetings?

These are questions typically found in an audit and lend themselves to a simple accounting of activity performance. In contrast, a program evaluation would address more substantive issues. The types of questions found during a program evaluation are

- Has employee participation at safety committee meetings helped improve the worksite's safety and health program?
- How is the work of the safety committee helping you meet your program goal?

Simply, a program evaluation looks at the *systems* you have created to carry out your safety and health program. A program evaluation identifies what systems are effective and efficient and what systems are not. In addition, unlike inspections, program evaluations focus on systems and not people.

2. WHO SHOULD PERFORM THE EVALUATION?

Unlike workplace inspections where the team is usually comprised of facility safety and health personnel and committee members, employees, and employee representatives, someone with fresh vision and unbiased eyes is needed for a program evaluation.

Some of the most important traits that an individual should possess to evaluate your safety and health program follow.

- experience in OSH technical aspects
- safety and health program knowledge
- knowledge of DOE operations (organization, terminology, Orders, etc.)
- familiarity with the evaluation process
- ability to methodically collect information
- competence in conducting interviews
- ability to communicate results in written and oral form

In addition to the traits listed above, the most important skill an evaluator should possess is the ability to gather and evaluate data. This data is used to effectively measure the value of various program elements and communicate it clearly to management.

3. WHAT PROGRAM ELEMENTS SHOULD BE EVALUATED?

A careful look at each main element of your safety and health program is helpful in evaluating the effectiveness of your written program and its implementation. Today, most safety and health professionals use the following four program elements that OSHA outlined in *Managing Worker Safety and Health* (February 1993):

CHAPTER 10: PROGRAM EVALUATION

- management leadership and employee involvement
- worksite analysis
- hazard prevention and control
- safety and health training

This is where having an acceptable written safety and health program becomes important. The written program documentation is the basis for program evaluation. This evaluation should determine whether the written program addresses all appropriate topics and if employees are working in accordance with the written program.

Safety and health professionals can use certain cues to identify potential trouble areas within these four program elements that may need further evaluation. Following is a listing of cues to look for within each of the four elements.

**Management
Leadership
and
Employee
Involvement**

Management demonstrates leadership by:

- Establishing and communicating safety and health policy.
- Establishing and communicating clear goals and objectives.
- Being visibly involved in employee safety and health.
- Ensuring employee involvement in identifying and resolving safety and health concerns.
- Assigning clear responsibility for safety and health.
- Giving adequate authority and ensuring efficient use of resources.
- Ensuring that quality principles are followed.

**Worksite
Analysis**

Worksite analysis should identify the following:

- Safety and health hazard surveys are comprehensive.
- New and emerging hazards are identified.
- Routine hazard analyses are performed and include
 - job hazard analysis or job safety analysis
 - process hazard analysis where complex and hazardous processes occur
 - phase hazard analysis (used most often in construction)
- Periodic worksite inspections are conducted and include
 - self-inspections conducted by supervisors in their work areas
 - general inspections of the entire site conducted by qualified safety and health personnel
- Employee reports of workplace hazards are acted upon.
- Accident/incident investigations are performed.

CHAPTER 10: PROGRAM EVALUATION

**Hazard
Prevention
and Control**

- Injury/illness trends have been analyzed.

Hazard prevention and control measures should include:

- engineering controls
- work practice controls
- PPE
- administrative controls
- disciplinary systems that help enforce controls
- preventive maintenance
- emergency preparedness
- occupational medical program

**Safety and
Health
Training**

Supervisors and employees display their knowledge of safety and health through:

- Exhibiting an understanding of their rights, roles, and responsibilities.
- Reporting incidents/accidents.
- Identifying and reporting worksite hazards.
- Using appropriate safeguards in the performance of their assigned duties.

Managers understand their leadership roles and responsibilities under the FEOSH program.

Qualified professional safety and health staff have knowledge, skills, and experience to implement FEOSH programs and state-of-the-art hazard control techniques.

Collateral duty safety and health personnel understand FEOSH activities and types of hazards and associated controls for activities that are their responsibility.

4. EVALUATION APPROACH

The evaluator needs to collect data about the safety and health program from several different areas. Areas that the evaluator will find most useful follow:

- document review
- interviews with employees at the management, supervisory, and worker levels
- worksite conditions review

**Document
Review**

DOE sites (Headquarters, Operations Offices, etc.) should have written programs, procedures, and records that formally document the safety and health program. The evaluator needs to compare the written program to activities that actually occurred. Written accident reports and injury and

CHAPTER 10: PROGRAM EVALUATION

illness logs are other documents that should be included in the evaluation process.

Employee Interviews

The evaluator may conduct formal or informal employee interviews. Formal interviews are privately conducted with randomly selected employees who are asked preselected questions. Informal interviews most often occur where employees perform their tasks, and questions generally follow a list of topics.

Much has been written about how to conduct an interview. Although interviewing techniques will differ among evaluators, the most important skill they should possess is the ability to listen.

Review of Site Conditions

The worksite condition reveals much about the safety and health program effectiveness. Worksite conditions can be observed directly through site tours and then compared to the results obtained by examining documents such as inspection reports of hazards, employee reports of hazards, and accident/incident investigations.

When performing a site tour, it is important that it does not become a routine inspection, with an emphasis on hazard detection and correction. If a hazard is found during a program evaluation, the evaluator should see that it is corrected. The focus of a program evaluation is to find what management system should have prevented or controlled a detected hazard. The evaluator must determine what system failed, why, and what corrective measures are needed to restore or improve it.

5. EVALUATING PROGRAM GOALS, OBJECTIVES, AND ACTIVITIES

As stated earlier, program evaluations focus on the existing systems that are put in place to meet your safety and health goals. These systems provide valuable insight into which program activities bring about desired results. They also may help to identify activities that consume resources but do not help you reach your goal.

All program activities should be planned with the intention of achieving specific objectives. In turn, these objectives are geared toward reaching a safety and health program goal. The following example may help explain the relationship between goals, objectives, and program activities and the importance they have in a program evaluation.

Sample Objective

One of the organization's goals is to develop a comprehensive safety and health program that effectively protects employees by preventing or controlling existing and potential workplace hazards. To reach this goal, one objective may be to develop a comprehensive preventive maintenance program. The program activities and procedures that need to occur so the organization can accomplish this objective may be the following:

Activity 1. Create a preventive maintenance checklist for all classes of company vehicles.

CHAPTER 10: PROGRAM EVALUATION

Procedure: Transportation Department Chief will hold a joint meeting for all drivers and vehicle maintenance mechanics for the purpose of determining maintenance needs and creating checklists outlining preventive maintenance tasks. Each checklist will assign responsibilities to the appropriate staff, indicate required time frames for specific maintenance procedures, and provide for sign-off when the procedures are complete.

Activity 2. Conduct a survey of non-vehicle machinery throughout the worksite to determine preventive maintenance needs.

Procedure: Each department official will list all machinery located within his or her work space. This list will include spaces for recording machinery operating problems, real or potential hazards associated with equipment use, and maintenance requirements. The Maintenance Department Chief and staff will visit each department to examine the machinery and meet with its operators. Following these activities, the Vice-President of Operations will receive a comprehensive report detailing the inventory of machinery, maintenance needs, and suggested maintenance schedules.

**Focus of the
Activity
Evaluation**

In the above example, the program evaluation would focus on the following questions:

- Did these two activities occur, and if so, did they support a comprehensive preventive maintenance program objective?
- Did the achievement of a preventive maintenance program move the organization closer to their targeted safety and health goal of protecting employees through preventing and controlling workplace hazards?

If evaluators find efforts that are ineffective and do not contribute to the goal, they need to report their findings and provide recommendations to remedy the situation. Whether the final analysis is favorable or not, it is important to know what safety and health activities are achieving the desired results.

**Activities and
Procedures**

When do you know that the safety and health program activities you are evaluating are bringing about the expected results?

Most DOE sites formally document their major safety and health program activities, as well as when these activities took place. Evaluating if and how well written procedures were followed is a function of program evaluation.

Knowing what questions to ask depends upon the activity and the way it was accomplished. For example, if an activity calls for a person to carry out an inspection program, questions that the evaluator might ask are:

- Did this person actually conduct the inspection?
- In most cases, inspections are conducted by the person having the most expertise, along with members of the safety and health committee. If this is the case, was the expert present during every inspection and did employee members always participate?

CHAPTER 10: PROGRAM EVALUATION

- Is there evidence that inspectors went to every area of the worksite that was specified in the inspection procedures?
- Did their reports indicate that the inspectors were finding the kinds of hazards they were trained to recognize?
- Was hazard correction appropriately assigned?
- Was the correction tracked to completion?

The evaluator needs to have a similar line of questioning for each activity under the safety and health program. The evaluator looks for any discrepancies between the original plan and the actual execution of the activity. Once the organization is informed of existing discrepancies, workers can determine the best procedure to meet the safety and health objective and ensure that everyone follows the procedure.

Sample Objective

Objectives connect the safety and health goal to the program procedures and activities. Sometimes objectives will improve an existing or complete a new activity. For example, an objective may read:

Complete one job safety analysis each month with a follow-up revision of safe work procedures and employee training in the following month.

This objective describes the frequency of activities rather than the desired result. An evaluation of this objective would be to determine if the activities took place. The evaluator would also seek evidence that monthly job safety analyses occurred and that procedure revisions and training followed (depending on the previous month's job safety analysis). If the answer to these questions is "yes" and the evaluator has no other associated questions, the frequency of these activities becomes an ongoing item to be included in an audit or inspection.

Evaluating Objectives

When evaluating an objective, the focus is on determining if program activities are bringing about the desired result. For instance, an objective might state:

Identify and assign all unassigned areas of safety and health responsibilities that are not presently assigned so that they may be successfully carried out.

Some activities needed to accomplish this objective are assigning a committee to list all the safety and health responsibilities; reviewing the assignment of responsibilities; identifying missing, duplicate, and unclear assignments; and recommending ways of clearly assigning responsibilities to the necessary individual.

In evaluating whether or not this objective was accomplished, an evaluator might ask the following questions:

- Are all previously unidentified safety and health responsibilities now identified?
- Once identified, were responsibilities clearly assigned?

CHAPTER 10: PROGRAM EVALUATION

If the answer to these questions was “yes” and the evaluator had no other concerns, then the routine task of identifying those employees with safety and health responsibilities would become an item for audit or entry on an inspection checklist.

However, if the evaluator discovers that, in order for these responsibilities to be assigned, the personnel department must rewrite several job descriptions, a second program objective is created. The new objective would request the personnel department to rewrite certain job descriptions so that safety and health responsibilities can be correctly assigned. Once this task is complete and responsibilities are formally assigned, the primary objective has been achieved. An objective is complete only when it does not lead to another objective.

Sample Goal

A goal is the expected accomplishment. A goal refers to the end result, and the objectives are the means of accomplishing that result.

Suppose the goal is:

- The reduction of hazards exposure to employees.

One supporting objective may be:

- Hold monthly employee safety meetings.

Since this is an activity objective, the evaluator can look for evidence that employee safety meetings occurred on a monthly basis. This effort would lend itself to a simple accounting task.

However, more importantly, the evaluator needs to determine if achieving this objective helped fulfill the goal of the safety and health program. By attending these meetings, did employees have a better understanding of workplace hazards, and did they take steps to control or eliminate their exposure?

Evaluating Goals

What methods could the evaluator use in determining if the goal to reduce employee hazards exposure was accomplished by holding monthly safety meetings (objective)? First, if employees who attended the monthly safety meetings signed an attendance list, they could be contacted and asked to describe or identify those hazards associated with their job tasks and what precautions they can take to limit their exposure. Second, if a sign-off sheet does not exist, the evaluator can obtain the same type of information by randomly interviewing employees. Third, interviews with supervisors could reveal whether or not monthly safety meetings helped to improve their employees’ ability to identify hazards and control their exposure.

If it appears that employees did not learn much from these monthly meetings, the evaluator should ask further questions to understand why. It is important to check all objectives to see if they are achieving the goal. It is worth the time and effort to identify those objectives that are not supporting the safety and health goal.

CHAPTER 10: PROGRAM EVALUATION

6. EVALUATION JUDGMENTS

The important work of collecting information about safety and health program activities is the most time-consuming part of a program evaluation. However, it is the easiest to understand and accomplish. The most difficult task in completing an evaluation is making judgments about the program's effectiveness.

Sample Evaluation Questions

Suggested evaluation questions (**Appendix 10-1**) provide a roadmap for evaluating an organization's safety and health program. **Appendix 10-2** provides example interview questions for employees and managers who are trying to determine their understanding of the program.

OSHA Baseline Questionnaire

The OSHA Baseline Questionnaire is a good source of information. It is intended to establish the current level of development and operation of each Federal agency's OSH Program as defined in 29 CFR Part 1960.

Copies of the questionnaire may be obtained from:

Office of Federal Agency Programs
Directorate of Compliance Programs
Occupational Safety and Health Administration
U.S. Department of Labor

Sample Evaluation Instructions

Employers should have formal methods or site-specific procedures for gathering information and making judgments. You may also want to add environmental, product safety, or security considerations to the evaluation process. The questions asked should be based on site objectives and program activities. **Appendix 10-3** gives some typical instructions for evaluators on how to compose the routine inspection results.

Insist that the evaluator determine the program's bottom line profitability or its real benefit. In other words, which activities contribute to the safety and health goal, and which do not? Evaluator judgments and decisions should be driven by this quest for real benefit. You should not accept a narrative that only describes the safety and health program. Insist that the evaluator ask the hard questions concerning program effectiveness.

Small Business Administration Checklist

A sample checklist from the Small Business Administration that may help in evaluating small organizations is available from the DOE FEOSH Program Office at (301) 903-3638.

7. HOW TO USE THE EVALUATION

The evaluation will prove valuable only if it leads to improved performance in meeting safety and health goals. Some of the recommendations that result from the evaluation will be for one-time corrections. Others will involve changing activities or incorporating new ones into the safety and health program's objectives. A permanent objective that calls for safety and health program activity auditing procedures may be established.

CHAPTER 10: PROGRAM EVALUATION

The evaluation should be a formal report that contains written recommendations and documented follow-up to those recommendations. It may be useful to refer to past years' evaluations when preparing new ones or planning new objectives. If you find that the same recommendations are being made year after year, the process of implementing and tracking recommendations to completion needs improvement.

8. AGENCY ANNUAL REPORTS

The OSH Act and Executive Order 12196 require all Federal agency heads to submit an annual report on their agency's OSH program to the Secretary of Labor. The report must contain information requested by the Secretary of Labor. DOE's Assistant Secretary for Environment, Safety, and Health (EH-1), responsible for preparing this report, delegates the report's preparation to the DOE FEOSH Program staff.

Report Date and Content. By January 1 of each year, every Federal agency must send the Secretary of Labor a report which describes the agency's OSH program for the previous fiscal year, identifies objectives for the current year, and summarizes findings of the agency's self-evaluation. EH-51 will provide guidance on what information DOE Elements should be collecting throughout the year in order to answer this annual data request.

Guideline Changes. Guidelines for agency annual reports are prescribed in OSHA Publication 2014, *Recordkeeping and Reporting Guidelines for Federal Agencies*. The Secretary of Labor must notify agencies by January 1 of any changes to the subsequent year's annual report guidelines. □

APPENDIX 10-1

FEOSH PROGRAM EVALUATION CHECKLIST

The following can be used to evaluate the state of an organization's FEOSH Program, and assist in improving the program and complying with Federal law. Federally-mandated requirements for a FEOSH Program are found in the OSH Act, Executive Order 12196, and 29 CFR Part 1960. DOE requirements are found in DOE Order 440.1 and its Implementation Guide.

MANAGEMENT INVOLVEMENT**1. POLICY, GOALS, AND OBJECTIVES**

Has a safety and health policy, signed by the highest ranking official, been established and communicated to all workers?

Does the safety and health policy declare the priority of worker safety and health over other goals, such as production?

Can workers express the safety and health policy or at least tell where they have seen it?

Have FEOSH goals been established, along with objectives, to ensure that safety and health activities are planned and completed?

Do managers and supervisors have their own written safety and health objectives for their organizations?

2. WRITTEN FEOSH PROGRAM

Is there a written site-specific FEOSH Program document that outlines a comprehensive program so that everyone understands roles, responsibilities, requirements, and safety and health procedures for the site?

Does the written FEOSH program cover all programs required, such as Industrial Hygiene, Occupational Medical, and additional hazard-specific technical areas, including firearms safety, fire safety, motor vehicle safety, explosives safety, etc.?

Are there one or more written programs for safety and health activities? Is there a taxonomy to show relationship between the documents? Is the information consistent and not contradictory between the documents?

3. FEOSH RESOURCES

Has management planned and budgeted for the FEOSH Program? Are FEOSH activities and funds identified in the ES&H Management Plan?

Are funds available to quickly correct identified safety and health hazards and provide workers with protective clothing and equipment?

Has management provided for qualified worker protection personnel to direct and manage the FEOSH program and perform technical safety and health activities?

Are sufficient specialized equipment (e.g., industrial hygiene instrumentation) and trained personnel available for monitoring and measuring health hazards?

4. ACCOUNTABILITY

Are responsibilities for managers, supervisors, and employees clearly assigned in the FEOSH program and position descriptions?

APPENDIX 10-1

Do performance evaluations for line managers and supervisors include specific criteria relating to FEOSH?

Are specific performance elements for FEOSH included in their performance standards? Are they tied to the organization's safety and health goals and objectives, as well as routine program activities?

5. LEADERSHIP AND COMMUNICATION

Is top management visibly involved in safety and health?

Does top management walk workspaces for safety and health purposes?

Do managers and supervisors participate with employee safety and health committees?

Can workers describe how managers are involved in safety and health activities?

Do workers perceive that managers follow safety and health rules and work practices?

Do supervisors reinforce safe work through positive feedback and training?

Does management respond adequately and in a timely manner to worker safety and health concerns?

Have any injuries occurred at the site because workers did not understand the importance of safety precautions?

Is there an annual summary of injuries and illnesses posted for employees?

If your workplace is co-located with other federal agencies or a contractor workplace, do you have written agreements (e.g., MOU, MOA, host/tenant agreement, or other written document) to ensure roles, responsibilities, and procedures for the safety and health activities are specifically spelled out and understood by all affected organizations?

EMPLOYEE INVOLVEMENT**1. SAFETY AND HEALTH COMMITTEES**

Do safety and health committees exist, and do workers have adequate representation on them?

Are the committee charters developed by the committees available?

Are committee members provided sufficient time to perform functions assigned by the committee? Are members trained in areas of responsibility?

Does management participate in or interface with the committee on the development of safety and health programs/practices, correcting hazards, and promotional activities?

2. WORKER PARTICIPATION

Are employees involved in identifying and solving safety and health problems?

Do those workers with safety and health responsibilities have adequate authority and resources?

Does evidence show that workers are held accountable for safety and health performance?

Are there one or more written programs that provide for worker involvement in decisions affecting safety and health?

Is there written documentation of management response to worker safety and health program activities and concerns?

APPENDIX 10-1

Have workers been involved in safety analyses, inspections, program reviews, etc.?

Do workers show pride in the achievements of the FEOSH program?

3. WORKERS' RIGHTS

Is there a written guarantee of employee protection from harassment resulting from safety and health program involvement?

Does a policy exist for stopping work in an imminent danger situation?

Does a system exist for workers to report safety and health concerns, and are workers using it?

Are workers or their representatives permitted to accompany DOE safety and health staff during workplace inspections?

Do workers have access to safety and health publications, standards, and procedures, as well as to results of inspections and accident investigations?

Are workers promptly notified when monitoring results indicate that they were overexposed to hazardous materials?

Is the FEOSH poster that informs employees of the provisions of DOE's safety and health program posted ?

WORKSITE ANALYSIS**1. PROGRAM REVIEW**

Is the site's FEOSH program reviewed periodically to evaluate success in meeting goals and to prepare new objectives?

2. HAZARD IDENTIFICATION AND EVALUATION

Are the following analyzed by qualified safety and health personnel to identify existing and potential workplace hazards and to evaluate the risk of injury or illness: designs for new or modified facilities and equipment; operations and procedures; and equipment, product, and service needs?

Are procedures in place to allow workers, through their supervisors, to stop work when an imminent danger is discovered?

Is appropriate workplace monitoring (e.g., personal, area, wipe, and bulk sampling) performed to assess workers' exposures to chemical, physical, biological, and ergonomic hazards? Is such monitoring documented adequately?

Has a baseline comprehensive survey of hazards been conducted? Is the baseline survey updated periodically?

Are all workplaces inspected by qualified safety and health personnel at least annually? Is there a schedule developed to ensure inspections are conducted, including frequent inspections of high-hazard areas?

Are job hazard analyses routinely conducted? Does your written program identify when and for what type of operations job hazard analyses should be conducted?

Do supervisors conduct regular self-inspections?

Does a program exist for identifying, documenting, testing, and removing counterfeit or suspect parts?

APPENDIX 10-1

Are employees submitting safety and health concerns?

3. ACCIDENTS, ILLNESSES, AND INJURIES

Do accident investigation reports show a thorough analysis of causes, rather than a tendency to blame the injured worker?

Are near misses investigated using the same techniques as for accident investigations?

In addition to the required OSHA No. 200, are careful records kept of first-aid injuries and/or illnesses that might not immediately appear to be work-related?

Are near misses, injuries, and illnesses analyzed and trended to uncover connections?

In reviewing the OSHA No. 200, are there patterns of illness or injury that should have been analyzed for previously undetected hazards?

Do Federal Employee Compensation Act (FECA) (human resources) managers and safety and health personnel routinely coordinate on workers compensation submissions, occurrence reports, and accident investigation reports (CAIRS) to ensure data are consistent and to share efforts to reduce injury, illness, medical, and compensation cost?

HAZARD PREVENTION AND CONTROL**1. HAZARD ABATEMENT**

Are identified hazards prevented or controlled in the best feasible manner?

Is hazard abatement considered during facility design and procedure development?

When new or repeat hazards are identified, are corrective actions taken in a timely manner?

Are corrective actions prioritized according to the risk to the worker? Do you have a standard methodology for assigning risk levels to hazards?

Are there procedures for development of abatement plans when corrective actions take longer than 30 days? Are abatement plans coordinated with the safety and health staff, resource manager, and organization responsible for making the corrective actions to ensure controls are properly designed and funds are available?

Is a database of identified hazards and abatement actions available to management to track and manage abatement through completion? Are follow-up evaluations made to ensure corrective actions are sufficient and do not impose any additional undetected hazards?

Do facilities and equipment receive regular maintenance to prevent hazardous breakdowns?

Are hazards addressed when selecting and purchasing equipment, products, and services?

Are accident countermeasures implemented for identified adverse trends in injury, illness, and workers' compensation? Are they well targeted? Are performance indicators used to evaluate the countermeasure efforts?

2. CONTROL METHODS

Have written safe work procedures been established based on job hazard analyses?

Are safe work procedures and safety and health rules enforced fairly and efficiently through a system that all workers understand?

Do written procedures exist for use of PPE (e.g., respirators)?

APPENDIX 10-1

Are hazards that could feasibly be controlled through improved design being inadequately controlled by other means (e.g., work practices or PPE)?

3. MEDICAL AND EMERGENCY PREPAREDNESS

Have arrangements been made for occupational health specialists to provide medical services?

Are first aid and CPR-trained workers available?

Are good, clear records kept of medical testing and assistance?

Does the occupational health care provider understand the potential hazards of the workplace (including contractor workplaces frequented by federal employees) so that occupational illness symptoms can be recognized?

Are exits, evacuation routes, and emergency telephone numbers prominently displayed?

SAFETY AND HEALTH TRAINING**1. TRAINING FOR MANAGERS AND SUPERVISORS**

Has top management received an orientation to enable them to manage the site's safety and health programs?

Have supervisors received training that covers: their safety and health responsibilities, regulatory provisions and standards, reporting procedures, hazard abatement procedures, and procedures for reporting and investigating allegations of reprisal?

Have supervisors received introductory and specialized courses and materials to enable them to recognize and eliminate or reduce safety and health hazards in their workplaces?

Have supervisors been taught how to train and motivate their workers to ensure safe and healthful work practices?

2. TRAINING FOR WORKERS AND THEIR REPRESENTATIVES

Are workers familiar with the FEOSH program?

Do employees receive specialized job safety and health training tailored to the work they perform?

Can workers explain the safety and health considerations involved in doing their job?

Can workers demonstrate correct use of required PPE?

Does the written training program include complete training for every worker in emergency procedures and in all potential hazards to which the worker may be exposed?

Do employee representatives receive introductory and specialized courses and materials to enable them to function effectively in ensuring safe and healthful working conditions and practices?

Do employee representatives receive training to enable them to assist effectively in conducting workplace safety and health inspections?

3. TRAINING FOR SAFETY AND HEALTH STAFF

Have safety and health specialists received safety and health training through courses, laboratory experiences, field study, and other formal learning experiences to prepare them to

APPENDIX 10-1

perform monitoring, consulting, testing, inspecting, designing, and other tasks related to the safety and health program?

Has a career development program been implemented for safety and health specialists?

Have safety and health inspectors received the training necessary to identify and evaluate hazards and to suggest general abatement procedures? Does such training address appropriate standards and the use of appropriate equipment and testing procedures?

4. OTHER TRAINING

Is appropriate training provided for collateral duty personnel?

Do visitors receive a safety and health orientation prior to being permitted unescorted access to the site?

APPENDIX 10-2

**FEOSH PROGRAMMATIC EVALUATION
MANAGEMENT SURVEY**

1. Each Agency is required to designate an official with sufficient authority and responsibility to represent the interest and support of the agency in the management and administration of the agency's OSH program. This individual is called the Designated Agency Safety and Health Official (DASHO).

Do you know who that individual is for the DOE and what position this individual holds within the Department?

2. Each agency is required to promulgate and publish an agency OSH policy and program to carry out the provisions of the legislation and Executive Order.

Do you know if the policy exists and what the major components of the OSH program include? Was the policy developed by EH, the Operational Office, the Cognizant Secretarial Office, or the HQ?

3. Each agency is required to create an organization, including provision for the designation of safety and health officials at appropriate levels, with adequate budgets and staffs to implement the OSH program at all operational levels.

Are you aware of the current organizational structure? How is the program managed and implemented? What are the current staffing and funding levels for the program?

4. Each agency is required to establish goals and objectives for reducing and eliminating occupational accidents, injuries, and illnesses.

Do these goals and objectives exist? What are they? How were they developed? How successful has the organization been in achieving its stated goals and objectives? Does the data exist? What are the trends [(e.g., dominant injuries and their causes, categories of workers (i.e., job functions) that seem to experience the most injuries/illness rates)].

5. Each agency is required to develop plans and procedures for evaluating its OSH program effectiveness at all operational levels.

Are you aware of these plans and procedures? How often are evaluations performed? Are there copies of past assessments?

6. Each agency is required to post conspicuously in each establishment, and keep posted, a Poster informing employees of the provisions of the OSH Act, the Executive Order and the agency OSH program. The DOL furnishes the core text for such a poster, to which each agency is required to add additional information.

Are there any impediments to the employee at your facility who desires to report an alleged unsafe or unhealthful condition?

7. Where a Notice of an Unsafe or Unhealthful Working Condition has been issued, the agency is required the prompt abatement of unsafe and unhealthful conditions.

Does your facility ensure the prompt abatement of unsafe and unhealthful conditions?

8. Agencies are required to establish procedures to assure that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthful working condition, or other participation in agency OSH program activities.

APPENDIX 10-2

Does your facility assure that no employee is subject to these or other forms of reprisal?

9. Each agency is required to provide OSH training to its top management officials, supervisors, safety and health specialists, safety and health inspectors, collateral duty safety and health personnel, OSH committee members, and employees and employee representatives. The types of training required are spelled out in 29 CFR 1960.

Does your facility provide the training required for these groups?

APPENDIX 10-2

FEOSH PROGRAMMATIC EVALUATION EMPLOYEE SURVEY

FEOSH SPECIAL EMPHASIS EMPLOYEE SURVEY

1. Each agency is required to designate an official with sufficient authority and responsibility to represent the interest and support of the agency in the management and administration of the agency's OSH program. This individual is called the DASHO.
Do you know who that individual is for the DOE and what position this individual holds within the Department?
2. Each agency is required to create an organization, including provision for the designation of safety and health officials at appropriate levels, with adequate budgets and staffs to implement the OSH program at all operational levels.
Are you aware of the current organizational structure? How is the program managed and implemented? What are the current staffing and funding levels for the program?
3. Each agency is required to post conspicuously in each establishment, and keep posted, a Poster informing employees of the provisions of the OSH Act, the Executive Order and the agency OSH program. The DOL furnishes the core text for such a poster, to which each agency is required to add additional information.
Have you seen any such posters in your facility?
4. Each agency is required to comply with all OSH standards issued under Sec. 6 of the OSH Act. Most of these standards appear in 29 CFR 1910 and 29 CFR 1926 for "General Industry" and "Construction," respectively.
Are you familiar with these documents and applicable DOE Orders (e.g., DOE Order 440.1 and its Implementation Guide and DOE 3790.1B, Chapter VIII)? Are copies available at your facility?
5. Each agency is required, during its inspections, to have both a representative of the official in charge of the workplace and a representative of the employees, accompany the inspector during his/her inspection of the facility.
Are employee representatives at your facility involved in such inspections?
6. Any employee or employee representative who believes that an unsafe or unhealthful working condition exists in any workplace where such employee is employed, shall have the right, and is encouraged, to make a report of the unsafe or unhealthful working condition to an appropriate agency safety and health official and request an inspection of such workplace for this purpose.
Have you seen any such posters in your facility?
7. Each agency is required to comply with all OSH standards issued under Sec. 6 of the OSH Act. Most of these standards appear in 29 CFR 1910 and 29 CFR 1926 for "General Industry" and "Construction," respectively.
Are you familiar with these OSHA standards and other applicable standards in DOE Orders 440.1 and 3790.1B, Chapter VIII)? Are copies available at your facility? Has your organization identified any additional standards that are necessary to provide a safe and healthful work environment at your facilities?

APPENDIX 10-2

8. Each agency is required to utilize qualified inspectors—personnel with the equipment and competence to recognize hazards. Inspections are required to be conducted by inspectors qualified to recognize and evaluate hazards of the working environment and general abatement (or corrective) procedures.

Are those who make inspections at your facility competent to recognize and evaluate hazards and suggest abatement procedures?

9. Each agency is required, during its inspections, to have both a representative of the official in charge of the workplace and a representative of the employees accompany the inspector during his/her inspection of the facility.

Are employees or employee representatives at your facility involved in such inspections?

10. Any employee or employee representative who believes that an unsafe or unhealthful working condition exists in any workplace where such employee is employed, shall have the right, and is encouraged, to make a report of the unsafe or unhealthful working condition to an appropriate agency safety and health official and request an inspection of such workplace for this purpose.

Are there any impediments to the employee at your facility who desires to report an alleged unsafe or unhealthful condition?

11. Each agency is required to maintain a log of reports of an existing or potential, unsafe or unhealthful working condition.

Does your facility have such a log?

12. Accidents, injuries, and illnesses at a facility are required to be investigated to determine the causal factors involved. Management information systems for injury and illness data must be analyzed to set program priorities.

Does your facility investigate accidents, injuries, and illnesses to determine causal factors? Are safety and health program activities and accident prevention priorities based on needs analysis and injury and illness experience at the site?

13. Where a Notice of an Unsafe or Unhealthful Working Condition has been issued, the agency is required to ensure the prompt abatement of unsafe and unhealthful conditions.

Are you informed of hazards that have been identified in your work area? Does your facility ensure the prompt abatement of unsafe and unhealthful conditions?

14. OSH committees provide a method by which employees can utilize their knowledge of workplace operations to assist management to improve policies, conditions, and practices.

Does your facility have such committees? Do you know how to participate in or interact with your committee?

15. Agencies are required to establish procedures to assure that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthful working conditions, or other participation in agency OSH program activities.

Does your facility assure that no employee is subject to these or other forms of reprisal? Do you feel you can report conditions you feel are hazardous to your supervisor? Manager? Safety and Health POC? EH? OSHA?

APPENDIX 10-2

16. Each agency is required to provide OSH training to its top management officials, supervisors, safety and health specialists, safety and health inspectors, collateral duty safety and health personnel, OSH committee members, and employees and employee representatives. The types of training required are spelled out in 29 CFR 1960.

Does your facility provide the training required for these groups? What safety and health training have you received?

17. Each agency is required to establish uniform requirements for the collection and compilation of OSH data for proper evaluation and necessary corrective action.

Does your facility have such a data collection system?

18. Each agency is required to develop and implement a program of self-evaluations to determine the effectiveness of its OSH program.

Does your facility have a program for self-evaluations (or self-inspections)?

19. Each agency is required to develop and implement a program for evaluating the effectiveness of its occupational safety and health program.

Does your facility have such a program for evaluating the effectiveness of its OSH program?

APPENDIX 10-3

SAMPLE FROM AN EVALUATION INSTRUCTION

The questions asked in this sample instruction relate to the section of the evaluation dealing with routine inspections. They are similar, however, to those that should be asked for every element in your safety and health program.

Write an evaluation report by responding to the following questions/instructions. Use complete sentences. Where appropriate, one sentence can cover more than one question. Your answers should reflect completed judgments. Avoid using terms that suggest incomplete judgments, such as “appears,” “apparently,” and “seems.”

Section 2. Routine Inspections

1. List any established objectives that involve routine inspections.
2. If any specific objectives were set for inspections, were they effectively met? Describe.
3. Are inspections following set procedures? If not, describe how they differ and how frequently this difference occurs.
4. If procedures are not being followed, discuss the reasons and whether the alternative activity meets the objectives for inspections.
5. Has inspection activity contributed to identification and control of hazards and potential hazards? Describe.
6. If not otherwise covered above, please answer the following and provide examples:
 - a. Are inspections revealing hazards escaping their controls? Examples: guards removed from machines, housekeeping problems, employees failing to follow established safety procedures. If so, be sure to deal with this topic in the evaluation of hazard prevention and control.
 - b. Are inspections revealing new hazards that either did not exist or were not identified previously? If so, be sure to deal with this topic under the evaluation of comprehensive surveys, change analysis, or routine hazard analysis.
 - c. Are inspections revealing repeated instances of the same problem? If so, is the problem going uncorrected or is it recurring after being corrected? If the former, be sure to deal with the problem under the evaluation of tracking of hazard correction, accountability, or both. If the latter, be sure to address the problem under hazard prevention and control.
7. List any recommendations for changes in routine inspection activity needed for next year. Make sure that the recommendations logically reflect the conclusions made above.