

FEOSH PROGRAM

Self-Assessment and Program Evaluation



June 1998

**Federal Employee Occupational Safety
and Health Program, EH-5**

**Office of Environment, Safety and Health
U.S. Department of Energy**

FOREWORD

The Federal Employee Occupational Safety and Health (FEOSH) program is responsible for approximately 16,000 DOE Federal employees, assigned throughout Power Marketing Administrations, Energy Technology Centers, Strategic Petroleum Reserves, Field Offices, Headquarters, and contractor facilities. The FEOSH program is Federally-mandated by 29 CFR Part 1960, *Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters*, and mandated by Congress with the enactment of Public Law 91-596, the *Occupational Safety and Health Act of 1970 (OSH Act)*, and directed by Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*. DOE Directive, DOE O 440.1; *Worker Protection Management for DOE Federal and Contractor Employees*; also outlines Departmental expectations and requirements (consistent with those outlined in 29 CFR 1960) for a performance-based approach to the development and implementation of an effective FEOSH program.

The objective of this document is to provide DOE organizational elements with a cost-effective and comprehensive means of evaluating and self-assessing their workplace-specific FEOSH programs. The self-assessment and programmatic evaluation tools included in this document enable the organization to assess:

- < The extent to which the FEOSH program is institutionalized and “owned” by line management and the employees, i.e., line management commitment to the program, employee involvement and ownership of the program, and organizational support to provide adequate resources,
- < Program effectiveness and functionality in terms of timely and proactive recognition and correction of existing and emerging safety and health issues and hazards,
- < Program completeness and comprehensiveness as benchmarked against the requirements of 29 CFR 1960, and
- < Program completeness and comprehensiveness as benchmarked against the requirements of DOE O 440.1.

It is recognized that the maturity and effectiveness of the FEOSH program varies across the complex. Additionally; the FEOSH program needs to be tailored to address workplace-specific hazards and vulnerabilities facing employees. As such, the evaluation tools presented in this document are designed so that they can be used as individual modules to meet specific program needs. For example, the document contains specific modules focusing on management commitment, employee involvement, walkthroughs and hazards recognition, and programmatic compliance with regulatory requirements. This approach enables the organizational elements to more efficiently utilize their limited resources by focusing on specific aspects of the FEOSH program deemed to require immediate attention (e.g., address emerging safety and health issues

such as ergonomics, improve programmatic compliance with 29CFR160, improve management involvement and visibility in the program, etc.).

Figure 1 provides a schematic of the FEOSH program self-assessment and program evaluation process. As illustrated, the process consists of four main components: 1) programmatic review in the context of 29 CFR 1960 requirements, 2) programmatic review in the context of DOE O 440.1 requirements, 3) line management and employees survey, 4) walkthrough and hazards identification, and finally 5) analysis and documentation of self-assessment results.

The results of self-assessments conducted by organizational elements will be used to develop cost-effective, complex-wide strategies to improve the overall safety and health of DOE Federal employees.

For further information and assistance please contact Dennis Lubow, Manager, DOE FEOSH Program, EH-5, at (301) 903-2075, or Leslie Bermudez, Senior Safety and Health Specialist, DOE FEOSH Program, EH-5, at (301) 903-9879.

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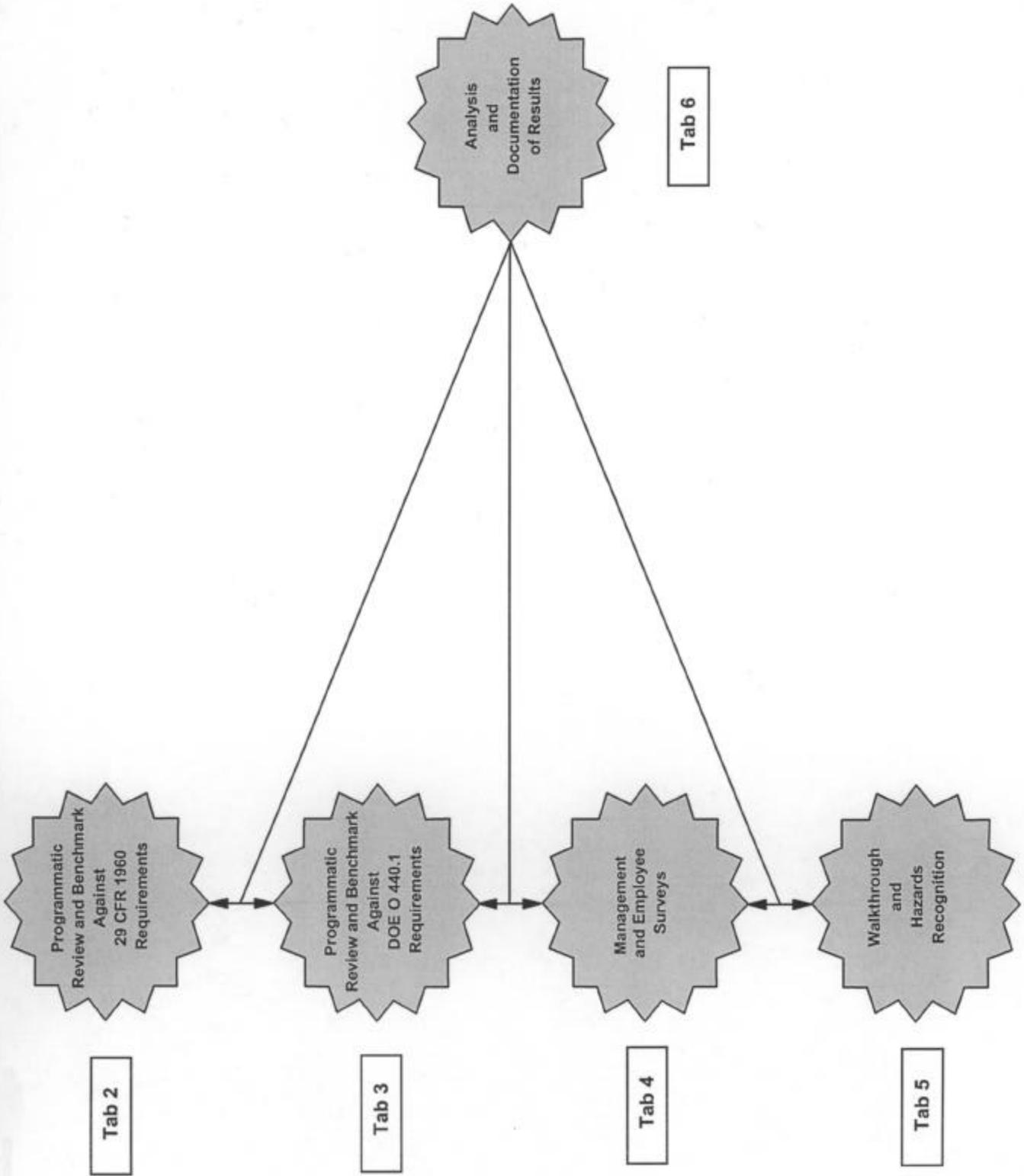


Figure 1. Schematic of FEOSH Program Self-Assessment and Program Evaluation Process

**Example 1:
Programmatic Review
(Program Functionality - Senior Management Perception)**

Subpart B: 1960.6--Designation of Agency Safety and Health Officials

1. Each agency is required to promulgate and publish an agency occupational safety and health policy and program to carry out the provisions of 29 CFR 1960 and Executive Order 12196.

Do you know if such a policy exists for the Department and for your organization? What are the major components of the occupational safety and health program?

2. Each agency is required to create an organization (including designating safety and health officials at appropriate levels) with adequate budgets and staffs to implement the occupational safety and health program at all operational levels.

Are you aware of the current organizational structure for safety and health in your organization? How is the program managed and implemented? What are the current staffing and funding level for the program?

3. 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? What data are available? 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]?

4. Each agency is required to develop plans and procedures for evaluating its occupational safety and health 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?

Subpart B: 1960.12--Dissemination of Occupational Safety and Health Information

5. Each agency is required to post conspicuously in each establishment, and keep posted, a Poster informing employees of the provisions of the Act, the Executive Order, and the agency occupational safety and health program. The Department of Labor furnishes the

core text for such a poster, to which each agency is required to add additional information.

Has the poster been posted in this building? What types of things are on the poster?

Subpart D: 1960.30--Abatement of Unsafe or Unhealthful Working Conditions

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

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

Subpart G: 1960.46--Allegations of Reprisal

7. Agencies are required to establish procedures to ensure 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 occupational safety and health program activities.

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

Subpart H: 1960.54-55-56-57-58-59--Training

8. Each agency is required to provide training in occupational safety and health to its top management officials, its supervisors, its safety and health specialists, its safety and health inspectors, its collateral duty safety and health personnel, its occupational safety and health committee members, and its 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?

Subpart C: 1960.16--Standards/Compliance with OSHA Standards

9. Each agency is required to comply with all occupational safety and health standards issued under Sect. 6 of the Occupational Safety and Health 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 (e.g., DOE O 440.1)? 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?

Subpart D: 1960.25--Qualifications of Safety and Health Inspectors and Agency Inspection

10. Each agency is required to utilize qualified inspectors, that is, "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 to suggest general abatement (or corrective) procedures.

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

Subpart D: 1960.27--Representatives of Officials in Charge and Representatives of Employees

11. For facility safety and health inspections, each agency is required to have both a representative of the official in charge of the workplace and a representative of the employees accompany the inspector(s).

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

Subpart F: 1960.36--Occupational Safety and Health Committees

12. Occupational safety and health 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? How is membership on the committee determined?

Subpart D: 1960.28--Employee Reports of Unsafe or Unhealthful Working Conditions

13. Any employee or representative of an employee 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? How many reports were submitted last year?

Subpart I: 1960.67-- Record or Log of Occupational Injuries and Illnesses

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

Does your organization have such a log? Where is it kept?

Subpart D: 1960.29--Accident Investigation

15. 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 analysis of needs based on injury and illness experience at the site.

Subpart I: 1960.66--Recordkeeping and Reporting Requirements

16. Each agency is required to establish uniform requirements for the collection and compilation of occupational safety and health data for proper evaluation and necessary corrective action.

Does your facility have such a data collection system? Are the data ever used for trending purposes?

**Example 2:
Programmatic Review (Key Aspects of 29 CFR 1960)**

Elements of 29 CFR 1960 Requirements

1960.6(a) - Appoint a Designated Agency Safety and Health Official (DASHO) of the rank of Assistant Secretary with sufficient Headquarters staff with necessary training and experience.

Note: Indicative of 1) senior-management involvement and commitment to the program, and 2) program visibility and significance within the organization

Establish:

1960.6(b)(1) - An OSH policy and program to carry out the provisions of section 19 of the OSH Act, Executive Order 12196, and 29 CFR 1960.

Establish:

1960.6(b)(2) - An organization to implement the OSH program at all operational levels.

Establish:

1960.6(b)(3) - Procedures to implement the OSH policy and program.

Establish:

1960.6(b)(4) - Goals and objectives for reducing and eliminating occupational accidents, injuries, and illnesses.

Elements of 29 CFR 1960 Requirements

Establish:

1960.6(b)(5) - Plans and procedures for evaluating the OSH program effectiveness at all operational levels.

Establish:

1960.6(b)(6) - Priorities with respect to the factors which cause occupational accidents, injuries, and illnesses in the workplace so appropriate corrective actions can be taken.

Note: *Indicative of institutional emphasis on and capability in effective hazards recognition, analysis, and control.*

1960.6(c) - Ensure that safety and health officials at each level have authority to plan for and ensure funding for necessary S&H staff, equipment, materials, and training.

1960.7(a) - Ensure that the budget submission includes appropriate financial and other resources to implement the OSH program.

Note: *Indicative of organization's ability to effectively plan, prioritize, and forecast FEOSH program needs and resource requirements.*

1960.7(b) - Plan for and request resources for the safety and health program; implement and evaluate the OSH budget.

Elements of 29 CFR 1960 Requirements

1960.7(c) - OSH resources shall include:

- (1) sufficient personnel to implement and administer the program at all levels;
- (2) abatement of unsafe or unhealthful conditions
- (3) S&H sampling, testing, and diagnostic and analytical tools and equipment, including lab analyses;
- (4) any necessary contracts to identify, analyze, or evaluate unsafe or unhealthful conditions/operations;
- (5) program promotional costs such as publications, posters, or films;
- (6) technical information, documents, books, standards, codes, periodicals, and publications; and
- (7) medical surveillance programs for employees.

1960.8(a) - Each employee is furnished employment and a place of employment free from recognized hazards that are causing or are likely to cause death or serious physical harm.

Note: *Indicative of organization's commitment to the safety and health of its employees.*

1960.8(b) - Comply with applicable OSHA standards.

1960.8(c) - Develop, implement, and evaluate an OSH program in accordance with section of the Act, Executive Order 12196, and 29 CFR 1960.

1960.8(d) - Acquire, maintain, and require the use of approved PPE, safety equipment, and other devices necessary to protect employees.

Elements of 29 CFR 1960 Requirements

1960.8(e) - Authorize S&H personnel to utilize expertise from other agencies, professional groups, consultants, universities, labor organizations, and S&H committees.

1960.9 - Supervisors comply with all applicable OSH standards and with all rules, regulations, and orders issued by DOE with respect to the OSH program.
Note: Indicative of 1) management's commitment to safety, and 2) management accountability for safety.

1960.10(a) - Employees comply with applicable OSH standards, rules, and regulations.

Note: Indicative of 1) organization's support of employee involvement , 2) employee commitment to safety, and 3) employee accountability for safety.

1960.10(b) - Employees use safety equipment, personal protective equipment, and safety procedures as directed.

1960.10(c) - Employees report unsafe and unhealthful conditions to appropriate officials.

1960.10(d) - Employees are authorized official time to participate in the activities provided for in Sect. 19 of the OSH Act, Executive Order 12196, 29 CFR 1960, and DOE's OSH program.

Elements of 29 CFR 1960 Requirements

1960.11 - Performance evaluations of management officials in charge of an establishment and supervisors measure performance in meeting requirements of the OSH program. (Superior performance should be noted.)

Note: *Indicative of management accountability for safety.*

1960.12(a) - Copies of the OSH Act, Executive Order 12196, and 29 CFR 1960, as well as details of the agency OSH program and applicable S&H standards, are made available to employees and employees representatives for review.

Note: *Indicative of 1) organization's commitment to safety awareness, and 2) encouragement of employee involvement and participation.*

1960.12(b) - A copy of the written OSH program for the establishment is made available to each supervisor, OSH committee member, and employee representative.

1960.12(c) - A poster informing employees of the provisions of the OSH Act, Executive Order 12196, and the agency OSH program is posted.

1960.12(e) - Employee awareness of OSH matters is promoted through information channels such as newsletters, bulletins, and handbooks.

1960.16 - Comply with all OSHA standards issued under section 6 of the Act or with alternate standards pursuant to 1960.

Elements of 29 CFR 1960 Requirements

1960.17 - Apply an alternate standard where deemed necessary and notify the Secretary and request approval of such alternate standards.

1960.18 - Adopt such emergency temporary and permanent supplementary standards as necessary and appropriate for application to working conditions of employees for which there exists no appropriate OSHA standards. Notify Secretary of subject matter upon initiation of standard development.

1960.19(a) - Where employees of different agencies engage in joint operations and/or primarily report to work or carry out operations in the same establishment, the standards adopted under 1960.17 and 1960.18 of the host agency govern.

1960.19(b) - Comply with other standards issued by Federal agencies which deal with hazardous working conditions, but for which OSHA has no standards.

1960.19(c) - Should conflict occur between OSHA standards and other Fed. Agency standards, comply with the more protective of the conflicting standards until issue is resolved jointly by Secretary and other Federal Agency.

1960.25(a) - Inspectors are qualified to recognize and evaluate hazards, suggest abatement procedures, and ensure that S&H specialists have experience and/or up-to-date training in OSH hazard recognition.

Note: *Critical in timely recognition and abatement of 1) existing S&H issues and hazards, and 2) emerging S&H issues.*

Elements of 29 CFR 1960 Requirements

1960.25(b) - Provide access to S&H inspectors who have appropriate security clearance to workplaces containing classified information.

1960.25(c) - All areas and operations of each workplace are inspected at least annually. More frequent inspections are conducted where there is an increased risk of accident, injury, or illness due to the nature of the work performed. Sufficient unannounced inspections and unannounced follow-up inspections are conducted to ensure hazard identification and abatement.

1960.25(d) - When situations arise involving multiple agencies' responsibilities for employee S&H conditions, coordination of inspection functions is encouraged.

1960.26(a) - Inspectors prepare by reviewing hazard reports, injury/illness records, previous inspection reports, and reports of unsafe and unhealthful working conditions. Determine in advance, where possible, the actual work procedures and conditions to be inspected.

Elements of 29 CFR 1960 Requirements

1960.26(b) -

- (1) Authorize inspectors to enter without delay, and at reasonable times, any environment where work is performed; inspect and investigate such place and conditions; and question employee, supervisor, and/or official in charge.
- (2) In the absence of employee representatives, inspector consults with a reasonable number of employees during the walkaround.
- (3) If necessary to conduct sampling, inspectors may request employees to wear personal monitoring devices.
- (4) Encourage employees to wear personal monitoring devices during an inspection, upon request of the inspector.
- (5) Upon conclusion that a danger exists, undertake immediate abatement and the withdrawal of employees who are not necessary for abatement of the dangerous conditions.
- (6) At inspection conclusion, S&H inspector confers with official in charge and appropriate employee representatives and informally advises them of any apparent unsafe/unhealthful working conditions.

1960.26(c)(1) - Inspectors describe in writing the procedures followed during the inspection.

1960.26(c)(2) - Notices of Unsafe or Unhealthful Working Conditions shall be issued not later than 15 days after completion of the inspections for safety violations or not later than 30 days for health violations. Notices include written description of the hazard, including classification of seriousness, standard referenced, and an abatement date. Copies of the notice are sent to the official in charge, employee representative(s), and/or S&H committee.

Note: Indicative of organization's commitment to 1) openness and awareness, and 2) correction of hazards.

1960.26(c)(3-4) - Facility directors immediately post the Notice at or near the hazard until the condition has been corrected or for three working days, whichever is later. Copy of the notice is filed and maintained for five years after abatement.

Elements of 29 CFR 1960 Requirements

1960.27(a) - S&H inspectors are in charge of inspections and may interview employees in private, if necessary. Representatives of the official in charge and employees shall be given an opportunity to accompany inspectors during the inspection to aid in the inspection and to provide representatives with more detailed knowledge of any condition.

1960.27(b) - S&H inspectors are authorized to deny right of accompaniment to any person interfering with a fair and orderly inspection.

1960.27(c) - With regard to classified facilities, only authorized personnel may accompany a S&H inspector.

1960.27(d) - S&H inspectors consult with employees to the extent deemed necessary.

1960.28(c) - Employees are encouraged to report unsafe and unhealthful working conditions and to request a workplace inspection.

Note: Critical in ensuring that 1) employees are involved in and committed to safety, 2) can freely identify S&H issues and hazards without the fear of reprisal, and 3) S&H issues are tracked and progress-to-completion is monitored.

1960.28(d)(1) - Record each report of an existing or potential unsafe/unhealthful working condition on a log maintained at the establishment. Send a copy of each report to the appropriate establishment S&H committee.

Elements of 29 CFR 1960 Requirements

1960.28(d)(2) - Assign a sequentially numbered case file, coded for identification to maintain an accurate record of the report and response. Minimally, each log should contain: date, time, code/reference/file number, location of condition, brief condition description, classification, and date and nature of action taken.

1960.28(d)(3) - Conduct inspections within 24 hours for employee reports of imminent danger conditions, within three working days for potentially serious conditions, and within 20 working days for other than serious working conditions.

1960.28(d)(4) - Notify an employee submitting a report of unsafe/unhealthful conditions in writing within 15 days if the official receiving the report does not plan to make an inspection based on such report. A copy of the notification should be provided to the S&H committee. Make the inspection or investigation report available to the employee making the report within 15 days after completion of the inspection for safety violations, or within 30 days for health violations.

1960.29(b) - Each accident which results in a fatality or the hospitalization of five or more employees is investigated to determine the causal factors involved.

Note: Critical in ensuring that serious/significant S&H issues and risks are effectively addresses and managed.

1960.29(c) - Any information/evidence uncovered during accident investigations which would be of benefit in developing a new OSHA standard or modifying/revoking an existing standard, is promptly transmitted to the Secretary.

Elements of 29 CFR 1960 Requirements

1960.29(d) - Reports of accident investigations are forwarded to the official in charge of the workplace, appropriate safety and health committee, and exclusive employee representative, if any; and include appropriate documentation on date, time, location, description of operations and accident, photographs, employee and witness interviews, measurements, and other pertinent information.

1960.30 - Prompt abatement actions are taken for unsafe or unhealthful conditions. If abatement is not possible within 30 calendar days, an abatement plan is prepared that includes a proposed timetable.

1960.37 - Elect to establish local S&H committees to monitor and assist in the execution of S&H policies and program at the workplaces within their jurisdiction. Committees shall have equal representation of management and nonmanagement employees.

Note: ***Critical in creating a forum that 1) employees are afforded an opportunity to raise and discuss S&H issues, 2) management is visibly involved and responsive to employee needs, and 3) S&H decisions are made in a timely manner.***

1960.39 - Make available to committees all agency relevant and necessary information to their duties, such as S&H policies and program, human & financial resources, accident, injury, and illness data, etc.

1960.46 - Establish procedures that no employee is subject to restraint, interference, coercion, discrimination or reprisal for filing a report of an unsafe/unhealthful working condition, or other participation in OSH program activities.

1960.47 - S&H committees shall be kept advised of agency activity regarding allegations of reprisal and any agency determinations thereof.

Elements of 29 CFR 1960 Requirements

1960.54 - Provide top management with orientation and other learning to enable them to manage OSH programs. Orientation should include coverage of Section 19 of the Act, Executive Order 12196, 29 CFR 1960, and the agency OSH program.

Note: Critical in ensuring that staff and management are fully aware of and competent in exercising their roles, rights, and responsibilities (applicable to subparts 55,56,57,58, and 59).

1960.55 - Provide comprehensive OSH training to supervisors consistent with the agency OSH program, Section 19 of the Act, Executive Order 12196, 29 CFR 1960, and any other applicable OSH standards and procedures. Training should enable supervisors to recognize and eliminate, or reduce, OSH hazards in their working units.

1960.56 - Provide OSH training for safety and health specialists through courses, lab experiences, field study, and other formal learning experiences. Implement career development programs for OSH specialists to enable staff to meet present and future program needs.

1960.57 - Provide training for S&H inspectors with respect to appropriate standards, use of equipment and testing procedures, as well as report preparation to support inspection findings.

1960.58 - Provide training for collateral S&H personnel and all members of certified OSH committees commensurate with the scope of their assigned responsibilities.

1960.59 - Provide appropriate S&H training for employees and employee representatives that includes information on the agency OSH program and employee rights and responsibilities.

Elements of 29 CFR 1960 Requirements

1960.60 - May seek training assistance from Secretary of Labor, NIOSH, and other appropriate resources.

1960.66 - Utilize information collected through management information systems to identify unsafe and unhealthful working conditions, and to establish program priorities.

Note: Critical in ensuring that 1) historical data are used to trend and monitor S&H performance, 2) existing and emerging S&H issues are identified, tracked, and dealt with in a timely manner, and 3) a risk-based approach is utilized to determine FEOSH program needs and priorities (applicable to subparts 66-73).

1960.67 - Maintain a record or log of all occupational injuries and illnesses.

1960.68 - Maintain a supplementary record for each occupational injury and illness. (OSHA Form No. 101, or OWCP Forms CA-1, CA-2, and CA-6)

1960.69 - Each Federal Agency, on a fiscal year basis, compiles an annual summary of occupational injuries and illnesses based on the record or log of occupational injuries and illnesses.

1960.70 - Within 48 hours after the occurrence of an employee accident, the head of the Federal Agency shall report by telephone to OSHA: (1) any occupational accident which is fatal to one or more employees and results in hospitalization of five or more people; and (2) any occupational illness which results in death.

Elements of 29 CFR 1960 Requirements

1960.71 - The log and supplementary records required by 1960.67 and .68 shall be maintained at each establishment. Each Federal agency shall post a copy of its agency annual summary of Federal occupational injuries and illnesses for an establishment at such establishment no later than 45 calendar days after the close of the fiscal year.

1960.72 - Provide the Secretaries of Labor and Health and Human Services with access to the maintained records.

1960.73 - Maintain and retain all records for five years following the end of the fiscal year to which they relate.

1960.79 - Develop and implement a program of self-evaluations to determine the effectiveness of OSH programs.

Note: Critical to ensure 1) continuous improvement, 2) demonstrate management's commitment to the FEOSH program, and 3) further solicit and encourage employee participation and involvement.

1960.88 - Participate in field Federal Safety and Health Councils.

Note: Effective for 1) exchange of ideas, 2) sharing of lessons learned, and 3) leveraging limited resources.

**Example 1:
Programmatic Review (Key Aspects of DOE O 440.1)**

Elements of DOE O 440.1 Requirements

440.1(a) - Implement a written worker protection program that:

440.1(a)(1) - provides a place of employment free from recognized hazards that are causing or are likely to cause death or serious physical harm to their employees; and

440.1(a)(2) - integrates all requirements contained in paragraphs 4a through 41 of this Order; program requirements, contained in Title 29 Code of Federal Regulations (CFR) Part 1960, “Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters”; applicable functional area requirements contained in Attachment 1; and other related site-specific worker protection activities.

440.1(b) - Establish written policy, goals, and objectives for the worker protection program.

440.1(c)- Use qualified worker protection staff to direct and manage the worker protection program.

440.1(d) - Assign worker protection responsibilities, evaluate personnel performance, and hold personnel accountable for worker protection performance.

Elements of DOE O 440.1 Requirements

440.1(e) - Encourage the involvement of employees in the development of program goals, objectives, and performance measures and in the identification and control of hazards in the workplace.

440.1(f) - Provide workers the right, without reprisal, to:

440.1(f)(1) - accompany DOE worker protection personnel during workplace inspections;

440.1(f)(2) - participate in activities provided in this Order on official time;

440.1(f)(3) - express concerns related to worker protection;

440.1(f)(4) - decline to perform an assigned task because of a reasonable belief that, under the circumstances, the task poses an imminent risk of death or serious bodily harm to that individual, coupled with a reasonable belief that there is insufficient time to seek effective redress through the normal hazard reporting and abatement procedures established in accordance with this Order;

440.1(f)(5) - have access to DOE worker protection publications, DOE-prescribed standards, and the organization's own worker protection standards or procedures applicable to the workplace;

Elements of DOE O 440.1 Requirements

440.1(f)(6) - observe monitoring or measuring of hazardous agents and have access to the results of exposure monitoring;

440.1(f)(7) - be notified when monitoring results indicate they were overexposed to hazardous materials; and

440.1(f)(8) - receive results of inspections and accident investigations upon request.

440.1(g) - Implement procedures to allow workers, through their supervisors, to stop work when they discover employee exposures to imminent danger conditions or other serious hazards. The procedure shall ensure that any stop work authority is exercised in a justifiable and responsible manner.

440.1(h) - Inform workers of their rights and responsibilities by appropriate means, including posting the appropriate DOE Worker Protection Poster in the workplace where it is accessible to all workers.

440.1(I) - Identify existing and potential workplace hazards and evaluate the risk of associated worker injury or illness.

Elements of DOE O 440.1 Requirements

440.1(I)(1) - Analyze or review:

440.1(I)(a) - designs for new facilities and modifications to existing facilities and equipment;

440.1(I)(b) - operations and procedures; and

440.1(I)(c) - equipment, product, and service needs.

440.1(I)(2) - Assess worker exposure to chemical, physical, biological, or ergonomic hazards through appropriate workplace monitoring (including personal, area, wipe, and bulk sampling), biological monitoring, and observation. Monitoring results shall be recorded. Documentation shall describe the tasks and locations where monitoring occurred, identify workers monitored or represented by the monitoring, and identify the sampling methods and durations, control measures in place during monitoring (including the use of personal protective equipment), and any other factors that may have affected sampling results.

440.1(I)(3) - Evaluate workplaces and activities accomplished routinely by workers, supervisors, and managers and periodically by qualified worker protection professionals.

Elements of DOE O 440.1 Requirements

440.1(I)(4) - Report and investigate accidents, injuries, and illnesses (reference DOE O 231.1, ENVIRONMENT, SAFETY AND HEALTH REPORTING; DOE O 232.1, OCCURRENCE REPORTING AND PROCESSING OF OPERATIONS INFORMATION; and DOE O 225.1, ACCIDENT INVESTIGATIONS) and analyze related data for trends and lessons learned (reference DOE O 210.1, PERFORMANCE INDICATORS PROGRAM AND ANALYSIS OF OPERATIONS).

440.1(I)(5) - Maintain a counterfeit/suspect parts program.

440.1(I)(5)(a) - Identify, document, test, and remove counterfeit or suspect parts.

440.1(I)(5)(b) - Report all suspect/counterfeit products to the responsible program office and the Office of the Inspector General in accordance with DOE O 231.2, DOE O 232.1, and DOE 2030.4B, REPORTING, FRAUD, WASTE AND ABUSE TO THE OFFICE OF INSPECTOR GENERAL, of 5-18-92.

440.1(I)(5)(c) - Ensure quality of products purchased from vendors supplying parts or goods whose failure could cause system failure or could harm workers.

440.1(I)(5)(d) - Maintain current, up-to-date knowledge of counterfeit or suspect parts or goods and associated vendors.

Elements of DOE O 440.1 Requirements

440.1(j) - Implement a hazard prevention/abatement process to ensure that all identified hazards are managed through final abatement or control.

440.1(j)(1) - For hazards identified either in the facility design or during the development of procedures, controls are incorporated in the appropriate facility design or procedure.

440.1(j)(2) - For existing hazards identified in the workplace, abatement actions prioritized according to risk to the worker are promptly implemented, interim protective measures are implemented pending final abatement, and workers are protected immediately from imminent danger conditions.

440.1(j)(3) - Hazards are addressed when selecting or purchasing equipment, products, and services.

440.1(j)(4) - Hazard control methods are selected based on the following hierarchy:

440.1(j)(4)(a) - Engineering controls.

440.1(j)(4)(b) - Work practices and administrative controls that limit worker exposures.

Elements of DOE O 440.1 Requirements

440.1(j)(4)(c) - Personal protective equipment.

440.1(k) - Provide workers, supervisors, managers, visitors, and worker protection professionals with worker protection training.

440.1(l) - Comply with the following worker protection requirements.

440.1(l)(1) - American Conference of Governmental Industrial Hygienists (ACGIH), “Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices” (most recent edition), when ACGIH Threshold Limit Values (TLVs) are lower (more protective) than Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits. [When ACGIH TLVs are used as exposure limits, DOE operations shall nonetheless comply with the other provisions of any applicable OSHA-expanded health standard.] The TLVs for exposures to laser emissions in the ACGIH Indices are excluded from this requirement.

440.1(l)(2) - American National Standards Institute Z136.1, *Safe Use of Lasers*. [Only the exposure limits and technical requirements apply. Programmatic components of America National Standards Institute Z136.1 do not apply.]

440.1(l)(3) - American National Standards Institute Z88.2, *Practices for Respiratory Protection*.

440.1(m) - Additional requirements for specific functional areas are contained in Attachment 1, Functional Area Requirements for DOE Elements.

Elements of DOE O 440.1 Functional Area Requirements

440.1 Attachment 1(1) Construction Safety.

440.1 Attachment 1(2) Fire Protection.

440.1 Attachment 1(3) Firearms Safety.

440.1 Attachment 1(4) Explosives Safety.

440.1 Attachment 1(5) Industrial Hygiene.

440.1 Attachment 1(6) Pressure Safety Requirements.

440.1 Attachment 1(7) Motor Vehicle Safety.

**Interview/Survey
Worker**

Name _____ **Phone Number** _____
Position _____ **Years in Position** _____
Organization _____ **Date** _____
Interviewer _____

1) What is your opinion about the safety program?

What are the organization's safety and health policy and goals?

2) What do you do to contribute to the safety and health program?

What are your safety and health responsibilities?

How do you know your responsibilities for safety and health?

How does your management demonstrate their support for your safety and health efforts?

What resources do you have to meet your responsibilities? (consider people, time, funding, and access to services)

3) How are you held accountable for safety and health?

What happens to a worker is he/she breaks a safety rule or does something dangerous?

What happens to a worker is he/she does something special to make the workplace safer?

4) How do you identify and control safety and health risks?

Are you involved in routine job hazard analyses? If yes, elaborate.

Are you involved in routine general hazard inspections? If yes, elaborate.

How can you raise a safety concern or complaint? Are responses appropriate and timely?

Are you involved in accident investigations? If yes, elaborate.

Are identified hazards addressed in a timely manner? Please elaborate.

How is the preventive maintenance program at preventing risk?

Are you prepared to respond to emergencies? How have you become prepared?

5) What are the most significant safety and health risks in your work area?

How do you protect yourself from these hazards?

6) What training have you received?

With respect to performing your job tasks?

With respect to safety and health?

With respect to responding to emergencies?

How is it determined if you need additional training?

7) How are you involved in the safety and health program?

What safety and health decisions do you make? What opportunities do you have to direct your own work?

How are you encouraged to communicate informally across functions and units?

8) How successful is the safety and health effort?

How is success in safety and health measured?

How does your safety performance compare to other organizations, industry averages, and benchmarks?

9) How are safety and health expectations and results communicated to you?

Do you attend safety meetings routinely? Please elaborate.

**Interview/Survey
Safety and Health Staff**

Name _____ Phone Number _____
Position _____ Years in Position _____
Organization _____ Date _____
Interviewer _____

1) What is your role in the safety and health program?

2) What are your safety and health responsibilities and what authority do you have to discharge your responsibilities?

What do you do in the safety and health program? How are your responsibilities communicated to you?

How does your management demonstrate support for your safety and health efforts?

What resources do you have to meet your responsibilities? (consider people, time, funding, and access to services)

3) Who is accountable for safety in the workplace and how are they held accountable?

Who gets in trouble in the event of a serious accident or incident?

4) How do you identify and control safety and health risks?

With respect to hazard assessment and communication?

With respect to evaluating new and planned facilities, equipment, and materials?

With respect to routine job hazard analyses?

With respect to routine general hazard inspections?

With respect to written employee complaints?

With respect to accident investigation?

With respect to timely hazard prevention and control?

With respect to preventive maintenance?

With respect to emergency planning and preparation?

With respect to medical services and emergency care?

5) What are the most significant safety and health risks you deal with?

6) What training have you received to help you perform your job?

Are you confident in your skills to do your job?

7) How are employees involved in the safety and health program?

What safety and health decisions do workers make? What opportunities do they have to direct their own work?

How are informal communications encouraged across functions and units?

8) How successful is the safety and health effort?

How do you measure success in safety and health?

Based on your safety and health measurement information, what are the trends?

How does your safety performance compare to other organizations, industry averages, and benchmarks?

How do you evaluate the service your organization receives from others?

9) How are safety and health expectations and results communicated?

10) What would you do to improve the safety and health program?

**Interview/Survey
Manager**

Name _____ **Phone Number** _____
Position _____ **Years in Position** _____
Organization _____ **Date** _____
Interviewer _____

1) What is your role in the safety and health program?

With respect to establishing and communicating safety and health policy?

With respect to establishing and communicating goals?

2) What are your safety and health responsibilities and what authority do you have to discharge your responsibilities?

What resources do you have to meet your responsibilities?

What are your responsibilities and authority for contractors and other organizations with whom you and your staff interface?

3) How are you and your subordinates held accountable for safety and health?

How is appropriate behavior reinforced and inappropriate behavior disciplined?

4) How do you identify and control safety and health risks?

With respect to hazard assessment and communication?

With respect to evaluating new and planned facilities, equipment, and materials?

With respect to written employee complaints?

With respect to accident investigation?

With respect to timely hazard prevention and control?

With respect to preventive maintenance?

With respect to emergency planning and preparation?

With respect to medical services and emergency care?

5) What are the most significant safety and health risks within your area of responsibility?

6) What training do your employees receive with respect to safety and health?

With respect to responding to emergencies?

7) How do you involve your employees in the safety and health program?

How do you encourage informal communications across functions and units?

8) How successful is your safety and health effort?

How do you measure success in safety and health?

Based on your safety and health measurement information, what are the trends?

How does your safety performance compare to other organizations,, industry averages, and benchmarks?

How do you evaluate contractor and tenant performance?

What do you do to improve safety and health data?

9) How are safety and health expectations and results communicated?

**Interview/Survey
Supervisor**

Name _____ **Phone Number** _____
Position _____ **Years in Position** _____
Organization _____ **Date** _____
Interviewer _____

1) What is your role in the safety and health program?

With respect to establishing and communicating safety and health policy?

With respect to establishing and communicating goals?

2) What are your safety and health responsibilities and what authority do you have to discharge your responsibilities?

How do you know your responsibilities and authority for safety and health?

How does your management demonstrate their support for your safety and health efforts?

What resources do you have to meet your responsibilities? (consider people, time, funding, and access to services)

3) How are you and your subordinates held accountable for safety and health?

How is appropriate behavior reinforced and inappropriate behavior disciplined?

4) How do you identify and control safety and health risks?

With respect to routine job hazard analyses?

With respect to routine general hazard inspections?

With respect to written employee complaints?

With respect to accident investigation?

With respect to timely hazard prevention and control?

With respect to preventive maintenance?

With respect to emergency planning and preparation?

5) What are the most significant safety and health risks within your organization?

How do you control these risks?

6) What training do your employees receive with respect to safety and health?

How do you match job skills with tasks upon placement?

How do you determine if additional training is needed to perform safely?

With respect to responding to emergencies?

7) How do you involve your employees in the safety and health program?

What safety and health decisions do your workers make? What opportunities do they have to direct their own work?

How do you encourage informal communications across functions and units?

8) How successful is your safety and health effort?

How do you measure success in safety and health?

Based on your safety and health measurement information, what are the trends?

How does your safety performance compare to other organizations, industry averages, and benchmarks?

9) How are safety and health expectations and results communicated?

WALKTHROUGH AND HAZARDS RECOGNITION

Posting Requirements		Yes	No	N/A
C	Is the DOE FEOSH poster displayed in a prominent location where all employees are likely to see it?	"	"	"
C	Are signs concerning fire and emergency escape routes, room capacities, or floor loading posted where appropriate?	"	"	"
C	Is the Summary of Occupational Illnesses and Injuries (OSHA No. 200) posted in the month of February?	"	"	"
Walking and Working Surfaces		Yes	No	N/A
C	Are floors, aisles and passageways kept clean, dry and all spills cleaned immediately?	"	"	"
C	Are carpets kept tight so they will not develop rolls or bunch up?	"	"	"
C	Are office areas uncluttered, without excessive accumulation of paper or other combustible material?	"	"	"
C	Are floor receptacle boxes located where they may cause tripping hazards?	"	"	"
C	Is sufficient space (room) provided in office areas between desks and other furniture, and adjacent to doors to facilitate exit into hallways?	"	"	"
C	Are electric and phone cords run across aisles or passageways?	"	"	"
C	Are stair rails or handrails provided on all stairways?	"	"	"
C	Are holes in the floor or other walking surfaces repaired properly, covered or otherwise made safe?	"	"	"
C	Are changes of direction or elevations readily identifiable?	"	"	"
C	Is adequate headroom provided for the entire length of any aisle or walkway?	"	"	"
C	Are all work areas properly illuminated?	"	"	"

Electrical Safety		Yes	No	N/A
C	Are flexible cords and cables used permanently as a substitute for fixed wiring?	"	"	"
C	Are all appliances plugged directly into receptacles?	"	"	"
C	Is all equipment connected by cord and plug (i.e., fans, space heaters, typewriters, microwaves, coffee pots, etc.) provided with grounded connections?	"	"	"
C	Are power strips or surge protectors overloaded, plugged in series or not used in accordance with the manufacturer's recommendations?	"	"	"
C	Have exposed wires, frayed cords, and deteriorated insulation been repaired or replaced?	"	"	"
C	Are junction boxes, receptacles, and switches provided with tight-fitting covers or plates, hence not exposing wires or conductors?	"	"	"
C	Are flexible cords and cables run through holes in walls or ceiling or through doorways and windows?	"	"	"
C	Are flexible cords and cables free from splices or taps?	"	"	"
C	Are multiple-plug adapters used?	"	"	"
Fire Protection		Yes	No	N/A
C	Are sprinkler heads kept clear of storage material, where the clearance between sprinkler heads and the top of storage is at least 18 inches?	"	"	"
C	Are fire doors unobstructed and protected against obstructions?	"	"	"
C	Are all doors that must be passed through to reach an exit or way to an exit always free to access with no possibility of a person being locked inside?	"	"	"
C	Are all fire extinguishers fully charged and in their designated places?	"	"	"
C	Are extinguisher locations free from obstructions or blockage?	"	"	"

C	Are all exit routes always kept free of obstructions?	"	"	"
		"	"	"
C	Are portable fire extinguishers provided in adequate number and type?			
C	Have all extinguishers been serviced, maintained, and tagged at intervals not to exceed one year?	"	"	"
C	Are all extinguishers checked monthly to see if they are in place or if they have been discharged?	"	"	"
C	Are fire extinguishers mounted in readily accessible locations?	"	"	"
Means of Egress		Yes	No	N/A
C	Are exits marked with an exit sign and illuminated by a reliable light source?	"	"	"
C	Is the direction to exits, when not immediately apparent, marked with visible signs?	"	"	"
C	Are doors, passageways or stairways, that are neither exits nor access to exits and which could be mistaken for exits, appropriately marked "NOT AN EXIT," "STOREROOM," etc?	"	"	"
C	Are there sufficient exits to permit prompt escape in case of fire or other emergency?	"	"	"
C	Are there doors which are required to serve as exits designed and constructed so that the way of exit travel is obvious and direct?	"	"	"
C	Are exit doors openable from the direction of exit travel without the use of a key or any special knowledge or effort when the building is occupied?	"	"	"
C	Where exit doors open directly onto any street, alley or other area where vehicles may be operated, are adequate barriers and warnings provided to prevent employees from stepping into the path of traffic?	"	"	"
C	Is emergency lighting in stairways, hallways and other work areas tested periodically to determine if they are in operable condition?	"	"	"

C	Are dead bolts affixed to exit doors?	"	"	"
C	Are door stops installed on exit doors?	"	"	"
C	Do smoke barrier doors close properly?	"	"	"

Yes No N/A

Ergonomics (Video Display Terminals)

C	Have ergonomics evaluations been conducted for:			
	1. Monitor and document arrangements:	"	"	"
	- positioned too high or too low			
	- positioned too close or too far away			
	- are not height adjustable			
	- are too difficult to see/read			
	2. Lighting/glare:	"	"	"
	- ambient light is too bright or too dim			
	- task lighting is needed			
	- glare is visible on the monitor			
	- operator faces uncovered window/uncovered light source			
	3. Workstations and accessories:	"	"	"
	- work surface is crowded or too small			
	- keyboard or work surface is too high or too low			
	- hand/wrist rests on hard/sharp edge			
	- hand/wrist rests on palm rest while keying			
	4. Work area:	"	"	"
	- the work area restricts body movement			
	- causes reaching/twisting/bending/awkward positions			
	- an anti-fatigue mat/footrail/footrest is needed but unavailable			
	5. Input devices:	"	"	"
	- contribute to non-neutral wrist/elbow/shoulder positions			
	- require excessive force to activate			
	- cannot be repositioned			
	- require awkward static positions			
	- require excessive reaches			
	6. Environmental issues:	"	"	"

	<ul style="list-style-type: none"> - the room temperatures are too hot or too cold - walls or dividers do not minimize noise - equipment noise is not isolated - the workstation is located in a crowded area - the workstation is not separated from walkways 			
C	Has an ergonomics evaluation been conducted for seating arrangements to determine if the seats:	"	"	"
	<ul style="list-style-type: none"> - lack a back rest which is separated from the seat pan - lack adequate/adjustable lumbar support - lack adequate/adjustable seat height - lack appropriate/adjustable arm rests 			
C	Are employees instructed in the proper manner of lifting heavy objects?	"	"	"
C	Has training been provided on how to adjust the workstation/seating?	"	"	"
	Hazardous Substances Communication	Yes	No	N/A
C	Is there a list of hazardous substances used in your workplace?	"	"	"
C	Is there a written hazard communication program dealing with MSDSs, labeling, and employee training?	"	"	"
C	Is each container for a hazardous substance labeled with product identity and a hazard warning?	"	"	"
C	Is there a MSDS readily available for each hazardous substance used?	"	"	"
C	Is there an employee training program for hazardous substances?	"	"	"
	Sanitation	Yes	No	N/A
C	Are restrooms kept in clean and sanitary condition?	"	"	"
C	Are covered receptacles for waste food kept in clean and sanitary condition?	"	"	"

C	Are food and drinks stored, prepared, and consumed where chemicals and cleaning products are stored and used?	"	"	"
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Medical Services and First Aid	Yes	No	N/A
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C	Are first aid supplies easily accessible to each work area, with necessary supplies available, periodically inspected and replenished as needed?	"	"	"
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C	Are medical personnel readily available for advice and consultation on matters of employee health?	"	"	"
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C	Are emergency phone numbers posted where they can be readily found in case of emergency?	"	"	"
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**Table 1:
Programmatic Review
(Documentation)**

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
Appoint a Designated Agency Safety and Health Official (DASHO) of the rank of Assistant Secretary with sufficient Headquarters staff with necessary training and experience.	6(a)		HQ Function	
Establish: An OSH policy and program to carry out the provisions of section 19 of the OSH Act, Executive Order 12196, and 29 CFR 1960, and paragraphs 4a through 41 of DOE Order 440.1 including applicable functional area requirements and other site-specific worker protection activities.	6(b)(1)	(a)(2)		
Establish: An organization of qualified worker protection staff to implement the OSH program at all operational levels.	6(b)(2)	(c)		
Establish: Written procedures to implement the OSH policy and program.	6(b)(3)	(a)		
Establish: Written goals and objectives for reducing and eliminating occupational accidents, injuries, and illnesses; encourage the involvement of employees in the development of program goals and objectives.	6(b)(4)	(b) & (e)		
Establish: Plans and procedures for evaluating the OSH program effectiveness at all operational levels; encourage the involvement of employees in the development of performance measures	6(b)(5)	(e)		

Elements	29 CFR 1960	DOE O 440.1	Coverage (Yes/No)	Implementing Document(s)
<p>Establish: Hazard prevention/abatement process including priorities with respect to the factors which cause occupational accidents, injuries, and illnesses in the workplace so appropriate corrective actions can be taken promptly, including interim actions pending final abatement; controls are incorporated into appropriate facility or procedure design; hazards are addressed when selecting new equipment, products, and services.</p>	6(b)(6)	(j)(1), (2), (3)		
<p>Hazard control methods are selected based on the following hierarchy:</p> <ul style="list-style-type: none"> C Engineering controls. C Work practices and administrative controls that limit worker exposure. C Personal protective equipment. 		(j)(4)		
<p>Maintain a counterfeit/suspect program:</p> <ul style="list-style-type: none"> C Identify, document, test, and remove counterfeit or suspect parts. C Report all suspect/counterfeit products to the responsible program office and the Office of the Inspector General in accordance with DOE O 231.2, DOE O 232.1, and DOE 2030.4B, REPORTING, FRAUD, WASTE AND ABUSE TO THE OFFICE OF INSPECTOR GENERAL, of 5-18-92. C Ensure quality of products purchased from vendors supplying parts or goods. C Maintain current, up-to-date knowledge of counterfeit or suspect parts 		(i)(5)		
<p>Ensure that safety and health officials at each level have authority to plan for and ensure funding for necessary S&H staff, equipment, materials, and training.</p>	6(c)			
<p>Plan for and request resources for the safety and health program; implement and evaluate the OSH budget.</p>	7(b)			

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
<p>OSH resources shall include:</p> <ul style="list-style-type: none"> (1) sufficient personnel to implement and administer the program at all levels; (2) abatement of unsafe or unhealthful conditions (3) S&H sampling, testing, and diagnostic and analytical tools and equipment, including lab analyses; (4) any necessary contracts to identify, analyze, or evaluate unsafe or unhealthful conditions/operations; (5) program promotional costs such as publications, posters, or films; (6) technical information, documents, books, standards, codes, periodicals, and publications; and (7) medical surveillance programs for employees. 	7(c)			
<p>Each employee is furnished employment and a place of employment free from recognized hazards that are causing or are likely to cause death or serious physical harm; employee has the right to decline to perform an assigned task because of a reasonable belief that, under the circumstances, the task poses an imminent risk of death or serious bodily harm; employees , through their supervisors, also have the right to stop work when they discover exposures to imminent dangers.</p>	8(a)	(a)(1) (f)(4) (g)		
<p>Comply with applicable OSHA standards. Specifically highlight standards as related to:</p> <ul style="list-style-type: none"> C Ergonomics C Electrical C General Office Safety C HAZCOM C Respiratory Programs C HAZWOPPER 	8(b)	Implied		

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
<p>Comply with the following worker protection requirements:</p> <ul style="list-style-type: none"> C American Conference of Governmental Industrial Hygienists (ACGIH), “Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices” (most recent edition), when ACGIH Threshold Limit Values (TLVs) are lower (more protective) than Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits. C American National Standards Institute Z136.1, <i>Safe Use of Lasers</i>. C American National Standards Institute Z88.2, <i>Practices for Respiratory Protection</i>. 		(1)		
<p>Additional requirements for specific functional areas are contained in Attachment 1, Functional Area Requirements for DOE Elements.</p>		(m)		
<p>Develop, implement, and evaluate an OSH program in accordance with section of the Act, Executive Order 12196, and 29 CFR 1960.</p>	8(c)			
<p>Identify existing and potential workplace hazards and evaluate the risk of associated worker injury or illness.</p>		(i)		
<p>Assess worker exposure to chemical, physical, biological, or ergonomic hazards through appropriate workplace monitoring (including personal, area, wipe, and bulk sampling), biological monitoring, and observation. Record results.</p>	28(d) (1)	(i)(2)		
<p>Analyze and review: 1) designs for new facilities and modifications to existing facilities and equipment; 2) new and existing operations and procedures including all work activities of workers, supervisors, and managers; 3) equipment, products, and service needs.</p>		(i)(1) (a),(b) &(i)(3)		
<p>Acquire, maintain, and require the use of approved PPE, safety equipment, and other devices necessary to protect employees.</p>	8(d)	(j)(4)(c)		

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
Authorize S&H personnel to utilize expertise from other agencies, professional groups, consultants, universities, labor organizations, and S&H committees.	8(e)			
Supervisors comply with all applicable OSH standards and with all rules, regulations, and orders issued by DOE with respect to the OSH program.	9			
Employees comply with applicable OSH standards, rules, and regulations.	10(a)			
Employees use safety equipment, personal protective equipment, and safety procedures as directed.	10(b)			
Employees report unsafe and unhealthful conditions and other related worker protection concerns to appropriate officials.	10(c)	f(3)		
Employees are authorized official time to participate in the activities provided for in Sect. 19 of the OSH Act, Executive Order 12196, 29 CFR 1960, and DOE's OSH program.	10(d)	f(2)		
Evaluate performance of all personnel with worker protection responsibilities including management officials in charge of an establishment; supervisors measure performance in meeting requirements of the OSH program. (Superior performance should be noted.); hold personnel accountable.	11	1(d)		
Copies of the OSH Act, Executive Order 12196, and 29 CFR 1960, as well as details of the agency OSH program, applicable S&H standards, and other DOE worker protection publications are made available to employees and employees representatives for review.	12(a)	f(5)		
A copy of the written OSH program for the establishment is made available to each supervisor, OSH committee member, and employee representative.	12(b)	f(5)		

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
A poster informing employees of the provisions of the OSH Act, Executive Order 12196, and the agency OSH program is posted.	12(c)			
Employee awareness of OSH matters is promoted through information channels such as newsletters, bulletins, and handbooks.	12(e)			
Comply with all OSHA standards issued under section 6 of the Act or with alternate standards pursuant to 1960.	16	(a)(2)		
Apply an alternate standard where deemed necessary and notify the Secretary and request approval of such alternate standards.	17			
Adopt such emergency temporary and permanent supplementary standards as necessary and appropriate for application to working conditions of employees for which there exists no appropriate OSHA standards. Notify Secretary of subject matter upon initiation of standard development.	18			
Where employees of different agencies engage in joint operations and/or primarily report to work or carry out operations in the same establishment, the standards adopted under 1960.17 and 1960.18 of the host agency govern.	19(a)			
Comply with other standards issued by Federal agencies which deal with hazardous working conditions, but for which OSHA has no standards.	19(b)			
Should conflict occur between OSHA standards and other Fed. Agency standards, comply with the more protective of the conflicting standards until issue is resolved jointly by Secretary and other Federal Agency.	19(c)			
Inspectors are qualified to recognize and evaluate hazards, suggest abatement procedures, and ensure that S&H specialists have experience and/or up-to-date training in OSH hazard recognition.	25(a)			
Provide access to S&H inspectors who have appropriate security clearance to workplaces containing classified information.	25(b)			

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
All areas and operations of each workplace are inspected at least annually. More frequent inspections are conducted where there is an increased risk of accident, injury, or illness due to the nature of the work performed. Sufficient unannounced inspections and unannounced follow-up inspections are conducted to ensure hazard identification and abatement.	25(c)			
When situations arise involving multiple agencies' responsibilities for employee S&H conditions, coordination of inspection functions is encouraged.	25(d)			
Inspectors prepare by reviewing hazard reports, injury/illness records, previous inspection reports, and reports of unsafe and unhealthful working conditions. Determine in advance, where possible, the actual work procedures and conditions to be inspected.	26(a)			
<ol style="list-style-type: none"> (1) Authorize inspectors to enter without delay, and at reasonable times, any environment where work is performed; inspect and investigate such place and conditions; and question employee, supervisor, and/or official in charge. (2) In the absence of employee representatives, inspector consults with a reasonable number of employees during the walkaround. (3) If necessary to conduct sampling, inspectors may request employees to wear personal monitoring devices. (4) Encourage employees to wear personal monitoring devices during an inspection, upon request of the inspector. (5) Upon conclusion that a danger exists, undertake immediate abatement and the withdrawal of employees who are not necessary for abatement of the dangerous conditions. (6) At inspection conclusion, S&H inspector confers with official in charge and appropriate employee representatives and informally advises them of any apparent unsafe/unhealthful working conditions. 	26(b)			

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
Inspectors describe in writing the procedures followed during the inspection.	26(c)(1)			
Notices of Unsafe or Unhealthful Working Conditions shall be issued not later than 15 days after completion of the inspections for safety violations or not later than 30 days for health violations. Notices include written description of the hazard, including classification of seriousness, standard referenced, and an abatement date. Copies of the notice are sent to the official in charge, employee representative(s), and/or S&H committee.	26(c)(2)			
Facility directors immediately post the Notice at or near the hazard until the condition has been corrected or for three working days, whichever is later. Copy of the notice is filed and maintained for five years after abatement.	26(c)(3-4)			
S&H inspectors are in charge of inspections and may interview employees in private, if necessary. Representatives of the official in charge and employees shall be given an opportunity to accompany inspectors during the inspection to aid in the inspection and to provide representatives with more detailed knowledge of any condition.	27(a)			
S&H inspectors are authorized to deny right of accompaniment to any person interfering with a fair and orderly inspection.	27(b)			
With regard to classified facilities, only authorized personnel may accompany a S&H inspector.	27(c)			
S&H inspectors consult with employees to the extent deemed necessary.	27(d)			

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
Employees are encouraged to report unsafe and unhealthful working conditions and to request a workplace inspection; employees have the right to: 1) accompany DOE worker protection personnel during workplace inspections; 2) observe monitoring of hazardous agents; 3) have access to the monitoring results; and, 4) receive results of inspections and accident investigations.	28(c)	(f)(1), (3),(6), (7),(8)		
Employees are informed of their rights and responsibilities by appropriate means.		(h)		
Record each report of an existing or potential unsafe/unhealthful working condition, including monitoring results, on a log maintained at the establishment. Send a copy of each report to the appropriate establishment S&H committee.	28(d) (1)	(i)(2)		
Assign a sequentially numbered case file, coded for identification to maintain an accurate record of the report and response. Minimally, each log should contain: date, time, code/reference/file number, location of condition, brief condition description, classification, and date and nature of action taken.	28(d) (2)			
Conduct inspections within 24 hours for employee reports of imminent danger conditions, within three working days for potentially serious conditions, and within 20 working days for other than serious working conditions.	28(d) (3)			
Notify an employee submitting a report of unsafe/unhealthful conditions in writing within 15 days if the official receiving the report does not plan to make an inspection based on such report. A copy of the notification should be provided to the S&H committee. Make the inspection or investigation report available to the employee making the report within 15 days after completion of the inspection for safety violations, or within 30 days for health violations.	28(d) (4)			

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
Each accident which results in a fatality or the hospitalization of five or more employees is investigated to determine the causal factors involved.	29(b)			
Any information/evidence uncovered during accident investigations which would be of benefit in developing a new OSHA standard or modifying/revoking an existing standard, is promptly transmitted to the Secretary.	29(c)			
Report and investigate accidents, injuries, and illnesses and analyze related data for trends and lessons learned. Reports of accident investigations are forwarded to the official in charge of the workplace, appropriate safety and health committee, and exclusive employee representative, if any; and include appropriate documentation on date, time, location, description of operations and accident, photographs, employee and witness interviews, measurements, and other pertinent information.	29(d)	(i)(4)		
Prompt abatement actions are taken for unsafe or unhealthful conditions. If abatement is not possible within 30 calendar days, an abatement plan is prepared that includes a proposed timetable.	30	(j)(2)		
Elect to establish local S&H committees to monitor and assist in the execution of S&H policies and program at the workplaces within their jurisdiction. Committees shall have equal representation of management and nonmanagement employees.	37			
Make available to committees all agency relevant and necessary information to their duties, such as S&H policies and program, human & financial resources, accident, injury, and illness data, etc.	39			
Establish procedures that no employee is subject to restraint, interference, coercion, discrimination or reprisal for filing a report of an unsafe/unhealthful working condition, or other participation in OSH program activities.	46	(f)		

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
S&H committees shall be kept advised of agency activity regarding allegations of reprisal and any agency determinations thereof.	47			
Provide top management with orientation and other learning to enable them to manage OSH programs. Orientation should include coverage of Section 19 of the Act, Executive Order 12196, 29 CFR 1960, and the agency OSH program.	54	(k)		
Provide comprehensive OSH training to supervisors consistent with the agency OSH program, Section 19 of the Act, Executive Order 12196, 29 CFR 1960, and any other applicable OSH standards and procedures. Training should enable supervisors to recognize and eliminate, or reduce, OSH hazards in their working units.	55	(k)		
Provide OSH training for safety and health specialists through courses, lab experiences, field study, and other formal learning experiences. Implement career development programs for OSH specialists to enable staff to meet present and future program needs.	56	(k)		
Provide training for S&H inspectors with respect to appropriate standards, use of equipment and testing procedures, as well as report preparation to support inspection findings.	57	(k)		
Provide training for collateral S&H personnel and all members of certified OSH committees commensurate with the scope of their assigned responsibilities.	58	(k)		
Provide appropriate S&H training for employees and employee representatives that includes information on the agency OSH program and employee rights and responsibilities.	59	(k)		
May seek training assistance from Secretary of Labor, NIOSH, and other appropriate resources.	60			

Elements	29 CFR 1960	DOE 0 440.1	Coverage (Yes/No)	Implementing Document(s)
Utilize information collected through management information systems to identify unsafe and unhealthful working conditions, and to establish program priorities.	66			
Maintain a record or log of all occupational injuries and illnesses.	67			
Maintain a supplementary record for each occupational injury and illness. (OSHA Form No. 101, or OWCP Forms CA-1, CA-2, and CA-6)	68			
Each Federal Agency, on a fiscal year basis, compiles an annual summary of occupational injuries and illnesses based on the record or log of occupational injuries and illnesses.	69		HQ Function	
Within 48 hours after the occurrence of an employee accident, the head of the Federal Agency shall report by telephone to OSHA: (1) any occupational accident which is fatal to one or more employees and results in hospitalization of five or more people; and (2) any occupational illness which results in death.	70			
The log and supplementary records required by 1960.67 and .68 shall be maintained at each establishment. Each Federal agency shall post a copy of its agency annual summary of Federal occupational injuries and illnesses for an establishment at such establishment no later than 45 calendar days after the close of the fiscal year.	71			
Provide the Secretaries of Labor and Health and Human Services with access to the maintained records.	72		HQ Function	
Maintain and retain all records for five years following the end of the fiscal year to which they relate.	73			
Develop and implement a program of self-evaluations to determine the effectiveness of OSH programs.	79	(d) & (e)		
Participate in Field Federal Safety and Health Councils.	88			

Elements of DOE O 440.1 Functional Area Requirements	Coverage (Yes/No)	Implementing Document(s)
440.1 Attachment 1(1) Construction Safety. Implement a construction analysis program that includes: hazard analysis, worker hazard awareness, workplace inspections and hazard abatement, and project safety and health plan.		
440.1 Attachment 1(2) Fire Protection. Implement a comprehensive fire protection program with the objective of providing an acceptable level of safety from fire.		
440.1 Attachment 1(3) Firearms Safety. Establish firearms safety policies and procedures to ensure proper accident controls are in place.		
440.1 Attachment 1(4) Explosives Safety. Ensure that applicable explosives operations comply with DOE M 440.1-1, DOE EXPLOSIVES SAFETY MANUAL		
440.1 Attachment 1(5) Industrial Hygiene. Implement a comprehensive and effective industrial hygiene program to reduce the risk of work-related disease or illness at affected facilities.		
440.1 Attachment 1(6) Pressure Safety Requirements. Ensure that all pressure vessels, boilers, air receivers, and supporting piping systems conform to: ASME, ANSI, and the strictest applicable State and local codes.		
440.1 Attachment 1(7) Motor Vehicle Safety. Implement a Motor Vehicle Safety Program to protect the safety and health of all drivers and passengers.		

**Table 2
Program Evaluation
(Summary Sheet)**

	<u>Yes/No</u>	<u>Comments</u>	Implementation * Effectiveness Score (1-4)
Management Involvement			
1. Have safety and health (S&H) policies and objectives been established and communicated to all workers?			
2. Does the S&H policy declare the priority of worker S&H over other goals, such as production?			
3. Can workers express the S&H policy or at least tell where they have seen it?			
4. Have any injuries occurred at the site because workers did not understand the importance of safety precautions?			
5. Is there a written goal for the S&H program, and is it updated annually?			
6. Are there written objectives, such as a plan for reaching the S&H goal?			

* A score of 4 indicates a fully developed and well functioning program element.

* A score of 1 indicates a lack of a program element or one in an infancy stage.

	<u>Yes/No</u>	<u>Comments</u>	<u>Implementation* Effectiveness Score (1-4)</u>
7. Do managers and supervisors have their own written objectives for S&H?			
8. Is top management visibly involved in S&H?			
9. Are there one or more written programs that involve top-level management in S&H activities?			
10. Can workers describe how managers are involved in S&H activities?			
11. Do workers perceive that managers follow S&H rules and work practices?			
12. Are S&H responsibilities clearly assigned?			
13. Are managers and supervisors held accountable for S&H?			
14. Do supervisors reinforce safe work through positive feedback and training?			

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* A score of 1 indicates a lack of a program element or one in an infancy stage.

	<u>Yes/No</u>	<u>Comments</u>	Implementation* Effectiveness Score (1-4)
15. Do performance evaluations for line managers and supervisors include specific criteria relating to S&H?			
16. Does management respond adequately and in a timely manner to worker S&H concerns?			
Employee Involvement			
1. Are employees involved in identify and solving S&H problems?			
2. Do those workers with S&H responsibilities have adequate authority and resources?			
3. Does evidence show that workers are held accountable for S&H performance?			
4. Are there one or more written programs that provide for worker involvement in decisions affecting S&H?			

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* A score of 1 indicates a lack of a program element or one in an infancy stage.

	<u>Yes/No</u>	<u>Comments</u>	Implementation* Effectiveness Score (1-4)
5. Is there written documentation of management response to worker S&H program activities?			
6. Is there a written guarantee of employee protection from harassment resulting from S&H program involvement?			
7. Do S&H committees exist, and do workers have adequate representation on them?			
8. Do workers show pride in the achievements of the FEOSH program?			
9. Does a policy exist for stopping work in an imminent danger situation?			
10. Have workers been involved in safety analyses, inspections, program reviews, etc.?			
11. Does a system exist for workers to report S&H concerns, and are workers using it?			

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* A score of 1 indicates a lack of a program element or one in an infancy stage.

	<u>Yes/No</u>	<u>Comments</u>	<u>Implementation* Effectiveness Score (1-4)</u>
Worksite Analysis			
1. Is the FEOSH program reviewed periodically to evaluate success in meeting goals and to prepare new objectives?			
2. Has a baseline comprehensive survey of hazards been conducted?			
3. Is the baseline survey updated periodically?			
4. Are S&H analyses conducted for new or modified facilities, processes, equipment, or material?			
5. Is job hazard analysis routinely conducted?			
6. Do supervisors conduct regular self-inspections?			
7. Do accident investigation reports show a thorough analysis of causes, rather than a tendency to blame the injured worker?			

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* A score of 1 indicates a lack of a program element or one in an infancy stage.

	<u>Yes/No</u>	<u>Comments</u>	Implementation* Effectiveness Score (1-4)
8. Are near misses investigated using the same techniques as for accident investigations?			
9. In addition to the required OSHA log, are careful records kept of first-aid injuries and/or illnesses that might not immediately appear to be work-related?			
10. Are near misses, injuries, and illnesses analyzed and trended to uncover connections?			
11. In reviewing the OSHA 200 log, are there patterns of illness or injury that should have been analyzed for previously undetected hazards?			
Hazard Prevention and Control			
1. Are identified hazards prevented or controlled in the best feasible manner?			
2. Have written safe work procedures been established based on job hazard analyses?			

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	<u>Yes/No</u>	<u>Comments</u>	<u>Implementation* Effectiveness Score (1-4)</u>
3. Are safe work procedures and S&H rules enforced fairly and efficiently through a system that all workers understand?			
4. When new or repeat hazards are identified, are corrective actions taken in a timely manner?			
5. Do facilities and equipment receive regular maintenance to prevent hazardous breakdowns?			
6. Do written procedures exist for use of personal protective equipment (e.g., respirators)?			
7. Are hazards that could feasibly be controlled through improved design being inadequately controlled by other means (e.g., work practices or PPE)?			
8. Have arrangements been made for occupational health specialists to provide medical services?			
9. Are first aid and CPR-trained workers available?			

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* A score of 1 indicates a lack of a program element or one in an infancy stage.

	<u>Yes/No</u>	<u>Comments</u>	Implementation* Effectiveness Score (1-4)
10. Are good, clear records kept of medical testing and assistance?			
11. Does the occupational health care provider understand the potential hazards of the workplace so that occupational illness symptoms can be recognized?			
12. Are exits, evacuation routes, and emergency telephone numbers prominently displayed?			
Safety and Health Training			
1. Are supervisors adequately trained to conducted S&H self-inspections?			
2. Are specified workers trained to conduct regular site inspections?			
3. Are workers familiar with the FEOSH program?			
4. Can workers explain the S&H considerations involved in doing their job?			

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	<u>Yes/No</u>	<u>Comments</u>	Implementation* Effectiveness Score (1-4)
5. Can workers demonstrate correct use of required personal protective equipment?			
6. 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?			

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* A score of 1 indicates a lack of a program element or one in an infancy stage.

**Table 3
Program Evaluation
(Summary Sheet)**

<u>Safety Program</u>	<u>Element In Place (Yes/No)</u>	<u>Implementation Effectiveness* Score (1-4)</u>	<u>Comments</u>
Ergonomics			
Electrical			
General Office Safety			
HAZCOM			
Respiratory Programs			
HAZWOPER			

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