

Verify That the Program is Implemented and Operating as Intended

Evaluate your program to make sure it is working as intended and getting you closer to your safety and health goals. Aim to do this at least yearly. How much and how often you evaluate will depend on things like the program's age and complexity and the hazards it must control.

To-Do

- Have your evaluation team review the implementation of core elements.
- Develop a list of questions to guide evaluation, based on what has been done so far.
- Document and communicate the results of the evaluation.

In this step, you'll evaluate whether the core parts of your safety and health program are in place and working as intended.

The team that began your evaluation (Worksheet 1) should review actions taken to implement each element of the safety and health program. The example questions below can help them with this review. The team should adapt the questions to reflect the goals and circumstances of your business. Use the answers to pinpoint strengths and weaknesses of your program so you can build on and improve it. For example, under Hazard Identification, if the workplace is not being inspected regularly, ask why not. Then figure out how to address the weakness.

Example questions

Management leadership:

- Has management created and communicated a written policy supporting the safety and health program?
- Does management show commitment to the program?

- Has management set specific goals and expectations for the program?
- Has management made plans for achieving goals?
- Has management provided enough resources for the program?
- Has management assigned roles and responsibilities for running the program?
- How well are workers, managers, and supervisors carrying out their safety and health assignments?
- Does management encourage and reward worker contributions to safety and health?

Worker participation:

- Do workers feel comfortable participating and giving input on safety and health issues?
- Do workers report injuries, illnesses, hazards, and concerns without fear of retaliation?
- Are workers trained on how to report an injury, illness, hazard, or concern? Do they know to report good catches/near misses?
- Does management acknowledge reports of injuries, illnesses, hazards, or concerns? Do they resolve the problems promptly with worker input?
- Do workers have access to information they need to understand safety and health hazards and hazard control measures?
- Are workers assigned roles and involved in all aspects of the program?
- Do language, skill, or education barriers prevent workers from participating?
- Are workers given time to participate during work hours? Do workers know they can stop work they believe to be unsafe?

Hazard identification and assessment:

- Does management review written materials to help identify hazards? Written materials include injury/illness logs, Safety Data Sheets, medical reports, workplace inspection results, incident investigation reports, and manufacturer literature.
- Are trends in injury and illness data, reports of hazards, incidents, etc., analyzed to identify common hazards?
- Is the workplace inspected regularly to identify conditions that pose or could pose a safety or health concern?
- Are you asking workers to identify the most dangerous activities, so you can address high-risk jobs?
- Is the workplace evaluated for exposure to health hazards?
- Before a change in the workplace, do workers and managers conduct a review to identify any safety or health issues? A change in the workplace might involve changing operations, workflow, worksite, equipment, or materials.
- Does management investigate incidents promptly? Does the investigation focus on finding and correcting the root cause(s) of the incident?

Hazard prevention and control:

- Are options for controlling hazards identified using sources such as OSHA, NIOSH, and industry best practices? Is input from workers considered?
- Do controls meet OSHA and other applicable standards and regulations?
- Are controls selected according to the hierarchy of controls?
- Is a hazard control plan used to plan and prioritize controls?
- Are all serious and recognized hazards addressed immediately? Are remaining hazards prioritized for further control?
- Are interim controls used when permanent controls cannot be used immediately?
- Are workers involved in selecting controls?
- Are controls in place to protect workers during emergencies and non-routine operations?
- Are controls monitored to ensure that they are effective and that workers understand their use?
- Is implementation of controls tracked to completion?
- Are controls inspected and maintained?

Education and training:

- Do all workers understand the parts of the program and how to participate in it?
- Do workers understand the employers' responsibilities under the program?
- Does everyone know their role in the program?
- Do workers understand the procedures for reporting injuries, incidents, hazards, and concerns?
- Are workers advised that they have a right to participate in the program and report injuries and illnesses without fear of retaliation or discrimination?
- Are workers trained to recognize and control hazards?
- Can workers ask questions, receive answers, and give feedback during and after training?
- Do workers receive extra training when a change in the workplace could introduce new or increased hazards?
- Do workers receive training in a language and at a literacy level they can understand?
- Do managers and supervisors understand their responsibilities and workers' rights under the OSH Act of 1970?
- Do managers and supervisors understand the process for receiving and responding to workers' reports of injuries, illnesses, and incidents?
- Do managers and supervisors understand the primary ways of identifying hazards and controlling them?
- Are managers and supervisors trained in ways of investigating incidents, including root cause analysis?

Program evaluation and improvement:

- Are goals and targets in place so that progress can be tracked?
- Are ongoing monitoring and assessment activities and performance criteria in place?

- Are all the safety and health program elements in place and operating?
- Are safety and health shortcomings corrected immediately, with an eye toward finding the root cause(s)?
- Does management seek input from everyone on how to improve the program?
- Are evaluation findings shared with all affected workers?

Communication and coordination for host employers, contractors, and staffing agencies:

- Is information exchanged among all workers at the worksite, regardless of their employer, about the hazards present and hazard controls?
- Are all workers trained and equipped to work safely?
- Does management coordinate with contractors and staffing agencies on work planning, scheduling, and resolving program differences?

Document and communicate the findings

The evaluation team can use the table below to record their findings. Have them write down the strengths and weaknesses they find for each of the program elements. The team should then recommend steps for dealing with each weakness. In doing this, they should attempt to address root causes. That is, the team should look for ways to keep the problem from happening again.

You will use the results of this evaluation in Worksheet 3. Be sure to communicate the results to everyone affected, and to those responsible for resources and other decision-making about safety and health.

EVALUATION RESULTS

STRENGTHS	WEAKNESSES	HOW TO ADDRESS WEAKNESSES
Management Leadership		
Worker Participation		

STRENGTHS	WEAKNESSES	HOW TO ADDRESS WEAKNESSES
Hazard Identification and Assessment		
<p>EXAMPLE:</p> <ul style="list-style-type: none"> • Most controls in the hazard control plan have been implemented. • Those controls have been checked to make sure they are working effectively. 	<ul style="list-style-type: none"> • Several planned actions have not been finished due to lack of funding. • We are still relying on hearing protection to shield workers from machine noise in the utility area. • The hazard control plan indicated that noise isolation barriers would be a more permanent, more reliable way to control this exposure. But they haven't been installed yet. 	<ul style="list-style-type: none"> • Management should improve forecasting of safety and health needs.
Hazard Prevention and Control		

STRENGTHS	WEAKNESSES	HOW TO ADDRESS WEAKNESSES
Education and Training		
Program Evaluation and Improvement		

STRENGTHS	WEAKNESSES	HOW TO ADDRESS WEAKNESSES
Communication and Coordination for Host Employers, Contractors, and Staffing Agencies		