Response due May 2, 2022

Guide to Evaluating Safety and Health Management Attributes

Please send your agency's report to the OSHA Office of Federal Agency Programs at ofap@dol.gov by **Monday, May 2, 2022**. If your agency is not able to submit a report by the due date, please contact Francis Yebesi at (202) 693-2596 or yebesi.francis@dol.gov to request an extension. If your agency does not submit a report, OSHA will report your agency's non-submission in the *Annual Report to the President on the Status of Federal Agencies' Occupational Safety and Health Programs*.

Please use this assessment aid to rate each attribute in the SHMS self-evaluation.

Attribute 1: Effective OSH self-inspections are performed regularly.

Purpose: To determine if personnel in your agency are performing effective safety and health inspections on a regular basis.

Assessment Tips:

- An inspection is a systematic comparison of observed status to expected or desired status and may be formal or informal.

- Formal inspections usually involve the use of checklists, and often result in the issuance of inspection reports. Informal procedures may be effective for routine and limited inspections in which the inspection coverage can be systematically addressed by rote.

- The term "regularly" means recurrence within understood limits (daily, weekly, monthly, quarterly, etc.), and does not necessarily mean a set pattern or firm schedule.

- Inspections are conducted at least quarterly so that the entire site is inspected annually.

- Self-inspection requires the organization to exercise an internal capacity to conduct effective safety and health inspections, ideally diffused throughout the organization.

- No inspection is effective unless each identified hazard is immediately corrected, or appropriately scheduled for correction in the organization's action plan for safety and health.

- A sample of inspection and/or monitoring reports over a period of time does not show patterns of recurring hazards or noncompliance.

Attribute 2: Effective OSH rules, safe work practices, and administrative controls are used to protect workers from hazards are in place.

Purpose: To determine if your agency has established general workplace rules and specific work practices that prescribe safe and healthful behaviors and task.

Assessment Tips:

- Workplace rules apply to general areas of conduct (for example, "No horseplay," and "Designated smoking area.").

- Safe work practices apply to specific operations or tasks (for example, "Hearing protection required while operating this equipment.").

- To be "effective," a workplace rule or work practice (1) must exist; (2) must be correct and sufficient; (3) must be communicated; and (4) must be followed by all personnel, both management and labor.

- Rules or work practices may be formally or informally communicated to workers. Formal communications are usually written, and include employee manuals, operating manuals, posters, postings on bulletin boards, and work aids. Informal communications are usually verbal, and include training, supervisory instructions, and peer influence.

- The presence of safety and rules and work practices alone does not substantiate a higher rating on this attribute. How they are implemented, communicated and upheld will be the determinant of a higher rating.

- Documentation of disciplinary actions, where taken, provides evidence of fair and consistent use for all levels of employees.

Attribute 3: Hazard incidence data are effectively analyzed to monitor OSH program performance and progress.

Purpose: To determine if your agency uses hazard incidence data to set safety and health priorities.

Assessment Tips:

- Hazard incidence data should be analyzed to enumerate hazard types, to detect time trends and spatial patterns, and to determine proportional distributions among operations and personnel. Results of the analyses are useful in setting hazard prevention strategies.

- Formal analysis of data involving less than 10 recorded hazards is not necessary. Interpretation of such small data sets should be readily apparent without manipulation. However, responsible persons in your agency should have reviewed the data, and be able to describe their conclusions if interviewed. Also, note that combining data for multiple years can increase the size of the data set, thereby possibly justifying formal analysis.

- A score of "Attribute is highly effective" on this attribute indicates that the agency collects and analyzes its hazard incidence data or that it recorded fewer than 10 hazards over the past three years, and responsible persons in the organization interpreted the data.

Attribute 4: A review of the overall safety and health management system is conducted at least annually to correct shortcomings and identify additional opportunities to improve.

Purpose: To determine if your agency periodically audits the management aspects of its overall safety and health system, determining progress achieved toward its safety and health objectives, and identifying needed changes or improvements.

Assessment Tips:

- An annual audit of the organizational SHMS should be conducted on a formal basis and provide a 'big picture' assessment of the overall impact that numerous small improvements are having on organizational performance. Ideally, the audit will correlate action successes and failures of the past year with outcome results, such as injuries and illnesses.

- There are numerous ways to perform an annual safety and health audit. It may be conducted internally or externally. Regardless of the method, it is essential that the audit process be data driven with top management endorsement. Although the annual audit is concerned with accountability for safety and health performance at all levels of the organization, it is primarily a scorecard for top management leadership. For this reason, top managers should be directly involved in the audit process or, at least, keenly aware of the audit results.

- The annual safety and health audit does not necessarily involve an inspection activity. Your agency may depend on previous inspection reports to conduct its analysis.

- Audits may be very brief in time and documentation if your agency successfully completed its planned safety and health actions, accomplished its objectives, and achieved the desired outcome results.

- An annual audit does not conflict with a "continuous improvement" approach to OSH management. The audit provides a "big picture" assessment of the overall impact that numerous small improvements are having on organizational performance.

- An annual audit or review is formal and written. At a minimum, it should highlight the accomplishments and identify the failures – and reasons for the failures – so that these issues can be addressed. Ideally, the audit will correlate action successes and failures with outcome results such as injuries and illnesses to determine if these actions should be extended, changed, or dropped, and whether new actions and/or objectives should be initiated.

- The audit should also track leading (worker participation in program activities, number and frequency of management walkthroughs, etc.) and lagging (number and severity of injuries/illnesses, OWCP data, etc.) indicators of progress toward accomplishing OSH goals. The most effective audits involve input from all levels of the organization: managers, supervisors, and workers. Top managers should be directly involved in the audit process or, at least, keenly aware of the audit results.

- Where applicable, agencies' annual audits should also evaluate the effectiveness of OSH coverage for onsite contractors.

Attribute 5: Individuals with assigned OSH responsibilities have the necessary knowledge, skills, and timely information to perform their duties.

Purpose: To determine if your agency's personnel have the understanding, skill and current information needed to effectively perform their safety and health responsibilities.

Assessment Tips:

- The intent of this attribute is to determine if the responsible person knows how and when to perform the assigned task.

- This attribute considers three types of learning that are necessary for effective task performance.
  - Knowledge refers to understanding gained from study or experience. Knowledge relates to the 'why,' and 'what if' issues associated with a task.
  - Skill refers to ability. It refers to the 'how,' and 'just do it' aspects of a task. Skill is usually obtained by practice to proficiency.
  - Timely information refers to advance data, instructions, alerts, warnings, or other communications that either trigger performance of a task, or alter the way it should be performed. It relates primarily to the 'when' aspects of task performance, and is particularly important under hazardous or emergency conditions.

- When rating this attribute, consider the depth and breadth of ongoing training provided to agency leadership, as well as occupational safety and health managers, and other representatives.

Attribute 6: Managers allocate the resources needed to properly support the organization's safety and health management system.

Purpose: To determine if your agency's managers demonstrate safety and health leadership, promote a culture of safety and health in the organization, and support effective operation of the safety and health management system by allocating needed resources.

Assessment Tips:

- In larger agencies, a safety and health budget or identifiable safety and health components in the general budget may exist as a source of information on the resources allocated to safety and health.

- A confirming cue is established when managers document current allocations for safety and health purposes and/or plans for future allocations to achieve safety and health improvements.

- An agency cannot score an "Attribute is highly effective" unless interviews and budget/purchase/spending reviews support a philosophy and practice regarding provision of adequate resources to accomplish the required OSH duties and agency goals.

Attribute 7: There is an effective process in place to involve employees in OSH issues.

Purpose: To determine if there is an established agency process that is known, trusted, and used by employees to provide input regarding safety and health issues.

Assessment Tips:

- Has a process been established for employee input on safety and health issues? An effective process for employee involvement should provide for (1) the solicitation of input, (2) the receipt of input, and (3) the acknowledgment of input. The established process may provide a single way or multiple avenues for soliciting, receiving, and acknowledging employee inputs.

- A highly effective way of both soliciting and receiving employee input is to ensure that employees are represented in small group meetings where safety and health issues are discussed.

- Much depends on the culture of the organization, and the management styles of its managers.

- In evaluating the process that provides acknowledgment, it is important to remember that any acknowledgment message should not only confirm that the employee input was received, but it should also provide feedback to the employee concerning how the information or suggestion was used.

- Some methods for soliciting input (including from volunteers and contractors, where applicable) are postings, e-mail, chain-of-command distributions, group OSH meetings, labor/management OSH meetings, and agency-wide meetings. Common methods of receiving workers input on OSH issues are chain-of-command reporting, managerial open-door policies, stop work authority, suggestion boxes, e-mail, and direct reporting to the safety director or OSH committee. The best system is the one that works for the organization.

- An agency cannot score an "Attribute is highly effective" for this criterion unless it provides multiple opportunities for workers to participate in OSH issues; the workers know, understand, and use the opportunities; the opportunities and involvement mechanisms effectively reduce OSH incidents and increase safe behaviors – and workers are aware of this effect; open lines of communication exist between workers and management regarding OSH issues; and management uses multiple methods to solicit, receive, and provide feedback on worker input regarding OSH issues.