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John K. Guenther

DEPARTMENT OF COMMERCE OFFICE OF HUMAN RESOURCES MANAGEMENT

HUMAN RESOURCES (HR) BULLETIN #248, FY20

SUBJECT: Occupational Safety and Health Program for the Office of the Secretary

EFFECTIVE DATE: Upon release of this HR Bulletin

Acting Director for Human Resources Management

and Chief Human Capital Officer

EXPIRATION DATE: Effective until canceled or superseded

SUPERSEDES: None

PURPOSE: This HR Bulletin establishes the requirements and responsibilities governing the implementation and management of the occupational safety and health program (OSH program) at the Department of Commerce (DOC), Office of the Secretary (OS). The OS OSH program operates under the authority and as an extension of <u>DAO 209-4 Occupational Safety and Health Program</u>. The program's policy elements are intended to support the development and growth of a strong safety culture that is integral to the organization.

The bulletin describes the OS-specific safety and health program that implements the provisions of DAO 209-4. It provides OSH program roles, responsibilities, and functions in the Office of Human Resources Management (OHRM), Office of Occupational Safety and Health (OOSH), and it delineates the framework for the administration of an effective OSH program. The program is intended to reduce or prevent work-related injuries, illnesses, and accidental losses by providing stakeholders (i.e., leaders, employees, contractors, associates, interns, visitors, and other occupants) a safe and healthful workplace.

PROGRAM FUNCTIONS AND LINE OF AUTHORITY

The OS safety and health function is located in OOSH, and reports to the OHRM Director, who reports to the Chief Financial Officer and Assistant Secretary for Administration (CFO/ASA). The OOSH Director appoints the OS Safety Program Manager (OSSPM), who functions as the primary subject matter expert and point of contact for all OS internal matters on life safety, as well as on occupational safety and health that impact OS personnel in the performance of their official duties. Working through the OOSH Director,

the OSSPM will have access to the OHRM Director, who functions as the Designated Agency Safety Health Official (DASHO) for both the DOC and the OS. The delegation of authority for the development, implementation, and management of the DOC's, OSH, and workers' compensation (WC) programs are authorized by these Department Organization Orders (DOOs): DOO 10-5 Chief Financial Officer and Assistant Secretary for Administration; and DOO 20-8 Director for Human Resources Management. This HR Bulletin functions as the delegation of authority for the development and management of the OSH program.

SAFETY and HEALTH POLICY: Under the authority of DAO 209-4, it is OS policy to provide safe and healthful work environments for all stakeholders. These conditions will be promoted through a comprehensive and effective program fully endorsed by the CFO/ASA, and implemented throughout the OS organization.

APPLICABILITY and SCOPE: The bulletin applies to all OS operating units (offices, or other organizational components) and to all personnel performing official duties (as described in the employee's position description). It applies to all contractors, associates, interns, visitors, and other occupants. All affected personnel shall comply with applicable safety and health policies, including applicable Occupational Safety and Health Administration (OSHA) regulations. When an applicable OSHA standard is not available, affected personnel shall comply with appropriate, and feasible, best practices based on mishap, incident, accident or near miss prevention measures contained in nationally recognized voluntary consensus standards. Examples of such nationally recognized consensus standards include those published by the American National Standards Institute (ANSI); National Fire Protection Association (NFPA); and American Society for Testing and Materials (ASTM International). The National Institute for Occupational Safety and Health (NIOSH) also publishes criteria documents containing recommended OSH standards for OSHA to promulgate.

The bulletin encompasses all major parts of an effective OSH program, to function as a compatible extension of DAO 209-4, "Occupational Safety and Health Program," and includes, but is not limited to, the following core elements:

- o Compliance with applicable OSH laws, regulations, and standards;
- o Individual, management, and supervisory responsibilities;
- o Senior leadership program engagement, funding, planning, review, and oversight;
- Identification, prevention, and control of workplace hazards (unsafe or unhealthful working conditions);
- When appropriate, implementation of prescribed actions regarding influenza-like illnesses (e.g., Covid-19);
- o Conducting periodic inspections (weekly, monthly, annual) of OS work areas, work sites, or work locations (excluding telework sites, such as employee residences);
- o Implementing prompt abatement of identified hazards, and tracking and documenting abatement activities to their completion;
- o Proper selection and use of personal protective equipment (PPE);

- Providing employees with procedures for reporting suspected work area safety and health hazards (unsafe or unhealthful working conditions) to supervisors and/or safety and health officials without fear of reprisal;
- Providing appropriate safety and health training for designated safety and health officials (including collateral duty safety officers (<u>CDSO</u>s)), managers, supervisory personnel, and employees;
- Appointing and training safety officers (including safety and health specialists and CDSOs) so they are qualified, competent, and knowledgeable in performing their job tasks effectively;
- o Implementing a thorough and systematic mishap, incident, accident or near miss notification, investigation, reporting, WC claims management, and recordkeeping process (use of DOL/OWCP ECOMP and support of the President's <u>PEER Initiative</u> (or similar initiative)) that provide performance metrics data and reporting; and
- o OSH program funding, organization, and staffing.

OS offices (organizational or operating units (OUs)) must meet the requirements established by the OSH program, and incorporate the information into their training and other communications, including:

a. **Program Authority and Departmental Policies:** The DOC is strongly committed to the safety and well-being of its dedicated, professional, and invaluable workforce. Towards this end, the Department developed and is implementing core or keystone OSH policies in the form of Department Administrative Orders (DAOs). Bureaus/OUs frequently develop and implement adjunct programs designed to operate as compatible extensions of the Departmental DAOs. (This OS-specific HR Bulletin operates under the auspices of DAO 209-4.) These DAOs and OU-level adjunct policies are key to the effective operation of DOC's occupational safety, health and WC programs and to accomplishing our mission.

Also, regulations require the OS to establish and maintain an effective OSH program (29 CFR 1960.1) that: (1) provides all stakeholders a place of employment free from recognized hazards that are causing, or are likely to cause, injury of any type, including death or serious physical harm; and (2) complies with applicable occupational safety and health laws, standards and regulations.

The core DAOs underpinning and directing the operation of the DOC's occupational safety, health and WC programs also serve as the Departmental authority for the bureaus/OUs' specific adjunct programs (e.g., OS's OSH program) and include:

- DAO 209-3, "Injury, Illness, Accident/Incident, Fatality and Motor Vehicle Accident Reporting and Investigation";
- o DAO 209-4, "Occupational Safety and Health Program"; and
- o DAO 202-810, "Workers' Compensation for Federal Employees";

The legal authorities pertaining to occupational safety and health for the bulletin include statutes, Executive Order (EO) 12196, and OSHA implementing regulations:

- The 1970 OSH Act as amended (Public Law 91-596), Section 19, "Federal Agency Safety Programs and Responsibilities" and Section 24, "Statistics";
- Executive Order (EO) 12196, "Occupational Safety and Health Programs for Federal Employees" dated February 26, 1980 (as amended by EO 12223, "United States Intelligence Activities," dated June 30, 1980);
- o 29 Code of Federal Regulation (CFR) Part 1960, "<u>Basic Program Elements for</u> Federal Employee Occupational Safety and Health Programs and Related Matters";
- o 29 CFR Part 1904, "Recording and Reporting Occupational Injuries and Illnesses";
- o 29 CFR Parts 1910, General Industry Standards and 1926, Construction Standards.
- b. **OSH Program Requirements and Standards:** As stated above, the DOC and OS have adopted OSHA standards, as well as DOC safety, health and WC programs, administrative policies, and operating procedures (DAOs, HR Bulletins, etc.) for use throughout the organization. The OSSPM will ensure that the required policies, operating procedures, and standards are made available to all employees, and that they are current, relevant, and (when appropriate) 508-compliant.
- c. Hazard Reporting Program: OOSH will promote and manage the hazard reporting and hazard notification program. All employees and supervisors have direct access to OOSH resources via Commerce Connection OOSH webpages, telephone, email, or other electronic devices. An open mailbox has been established so safety concerns can be reported and received anonymously. Employees (and others) can report unsafe and/or unhealthy working conditions to docsafety@doc.gov, which is an established mailbox monitored regularly by OOSH staff. It receives notifications of hazards (unsafe or unhealthful working conditions) or procedures that are perceived as hazardous. This email address is also posted on the Commerce Connection OOSH webpage or OOSH landing page.
- d. **Training:** New Employee Orientation (NEO) Training is conducted regularly, and hosted/managed by OHRM. A brochure is provided that advises newly appointed employees on the safety and health requirements they are expected to adhere to as DOC/OS employees. The NEO brochure and other resources are accessible online from the OOSH webpages. OOSH provides safety training in the New Supervisor's Orientation Training presentation. OOSH also provides independent safety training when requested by supervisors. Safety training is furnished through methods that include computer-based training via the Commerce Learning Center (CLC); in-house, classroom-based presentations; OOSH webpage-based, self-paced safety trainings; and contracted safety training (e.g., First Aid, CPR, etc.). When requested, independent safety training will be planned, scheduled, and performed by the OSSPM (or designees) with the approval of the OOSH Director. Documentation records of safety training of all personnel will be maintained through the CLC or the responsible supervisor. Safety training topics, tools, and resources available through OOSH webpages include, but are not limited to:
 - o DOC OSH Program Orientation Training Presentation
 - o New Employee OSH & WC Programs Orientation Pamphlet

- o Basic Managers' and Supervisors' Safety Training Presentation
- o What do I need to know about DOC's Federal Employee Occupational Safety and Health (FEOSH) program?

<u>Note</u>: All current and new managers, supervisors and employees are required to complete the <u>DOC OSH Program Orientation Training Presentation</u>.

e. **OSH Inspection Program:** As part of maintaining oversight of their respective work areas, supervisors should conduct periodic (weekly, monthly) walk-through inspections to identify unsafe or unhealthful working conditions. More formal work area OSH inspections are to be conducted on an annual basis or as required.

Generally, inspections are to be conducted by designated and qualified representatives such as supervisors, CDSOs, the OSSPM, and/or safety and health specialists. Because the majority of OS work locations are office centric (there are no industrial work sites under the Safety Program's scope of inspection responsibility), such inspections can be completed through the use of a specialized checklist. Examples of DOC/OS work area, inspection-focused checklists include:

- o DOC Office Safety and Health Office Inspection & Risk Assessment Checklist;
- o DOC Office Safety Inspection Checklist for Supervisors and Program Managers (Form CD-574).

Follow-up to these inspections will be conducted with coordination and approval from the OSSPM, and can be conducted with or without prior notice. Follow-up inspections will include a verification that all previously noted discrepancies (e.g., work area hazards (unsafe or unhealthful working conditions)) have been effectively corrected and closed.

f. Recordkeeping, Incident Investigation, and Reports: The OSSPM will manage this function by implementing DAO 209-3 provisions, with active support and participation from the employee experiencing a work-related mishap, incident, accident, or near miss, and his/her supervisor. The OSSPM will coordinate, review, and validate all incident investigation reports to justify lost time, time away from work, and in situations where an injured/ill employee's job was altered due to a work-related injury or illness. The OSHA and WC-required documentation will be maintained through use of the Employee Compensation Operations and Management Portal (ECOMP) operated by the Department of Labor (DOL), Office of Workers Compensation Programs (OWCP). ECOMP will be used to electronically file reports of injury or illness, as well as claims for WC benefits. DOC bureaus use ECOMP to record occupational injuries/illnesses (OSHA Form 301, Injury and Illness Incident Report) as well as to file WC claims (CA-1 or CA-2 forms).

An employee experiencing a work-related mishap or incident resulting in an injury or illness, and his/her supervisor, are responsible for submitting the following mishap or incident-related forms via ECOMP: OSHA Form 301, Injury and Illness Incident

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Report; and various WC claims-related forms. WC claims-related forms include, but are not limited to: Form CA-1, Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation; Form CA-2, Notice of Occupational Disease; Form CA-7, Claim for Compensation on Account of Traumatic Injury or Occupational Disease; Form CA-7a, Time Analysis; Form CA-16, Authorization for Examination and/or Treatment. OOSH staff and the DOC's WC support contractor will coordinate and oversee the process to ensure consistency and data validity.

<u>Note</u>: For a complete list of WC forms, see <u>Injury Compensation for Federal Employees</u> (Publication CA-810), a booklet produced by the OWCP, DOL.

DEFINITIONS: Technical terms are used throughout the bulletin. Defining them can enhance the users' understanding of the bulletin's requirements. In order to maintain consistency in the use of OSH-related terminology across OSH policy documents, the definitions sections of the core DOC orders are incorporated by reference: <u>DAO 209-3</u>, <u>DAO 209-4</u>, and <u>DAO 202-810</u>. Examples of OSH-related terminology appearing in the bulletin, as well as other OSH policy documents, include – mishap, incident, accident, near miss, CDSO.

<u>Note</u>: For a more comprehensive listing of OSH and WC terms, see <u>Glossary and Acronyms of Frequently Used Safety, Health and Workers' Compensation Programs-Related Terms</u>.

ROLES AND RESPONSIBILITIES:

- a. **Designated Agency Safety Health Official (DASHO):** The OHRM Director functions as the <u>DASHO</u> for the DOC and OS. The DOC DASHO is appointed in writing under the authority of DOO 10-5 and DOO 20-8, and has sufficient authority to make policy that applies organization-wide. The DASHO is responsible for the establishment, funding, administration, and enforcement of the OSH program, including:
 - 1. Developing policy and procedures to carry out the provisions of Section 19 of the Act, EO 12196, and 29 CFR Part 1960;
 - 2. Establishing and maintaining the DOC's Office of Occupational Safety and Health with appropriate resources (e.g., adequate budget and staff) to implement the program;
 - 3. Setting goals and objectives for reducing and eliminating workplace accidents, injuries, and illnesses (e.g., PEER Initiative);
 - 4. Ensuring the development, issuance, and maintenance of adequate requirements and guidelines, including procedures for response to emergencies so that each OS operating unit (OU) can effectively implement the OSH program;
 - 5. Functioning as the 'authority having jurisdiction' on issues pertaining to the evaluation, acceptance, and management/abatement of occupational safety and health risk;

- 6. Ensuring that adequate funding, resources, OSH information, education, and training are provided to the organizational leaders, managers, supervisors, CDSOs, and employees of OS operating units;
- 7. Incorporating safety standards in leadership/management employees' performance plans based on the requirements of 29 CFR 1960.11, Evaluation of occupational safety and health performance;
 - <u>Note</u>: Based on this requirement, a leadership/management critical element is included in leadership/management employees' performance plans/evaluations. The critical element focuses on the leadership/management employees' accountability for providing a safe and healthful work environment for all employees (with an ongoing focus on OSH program issues, duties, and activities); and
- 8. Ensuring that the OSH program complies with obligations under the Rehabilitation Act to provide access to facilities and to provide reasonable accommodations for qualified individuals with a disability.
- b. **OOSH Director:** The OOSH Director, assisted by staff, will maintain an Agreement for all medical services at the Herbert C. Hoover Building (HCHB) with a qualified vendor (i.e., Federal Occupational Health (FOH) or equivalent). The OOSH Director is the official responsible for oversight of the HCHB Health Unit and the OS OSH program. As a principal assistant to the DASHO, the OOSH Director's responsibilities include:
 - 1. Selecting and appointing a qualified OS Safety Program Manager (OSSPM);
 - 2. Overseeing all of the OSSPM's OSH program-related activities, including evaluation of the program's effectiveness and compliance with Federal and DOC requirements; and
 - 3. Overseeing all of the OSSPM's OSH program-related activities in developing policy, requirements, roles, responsibilities, and implementing guidance for the program.
- c. **OS Safety Program Manager (OSSPM):** The OS Safety Program Manager will implement the OS OSH Program, including the planning, coordination, and execution of all activities designed to protect personnel and property from harm. As a principal assistant to the DASHO and OOSH Director, the OSSPM's responsibilities include:
 - 1. Conducting and/or guiding safety and health program evaluations such as audits, loss source analyses, gap analyses, and inspections of the OS operating units to:
 - Gather and review information necessary to identify workplace safety and health hazards (unsafe or unhealthful working conditions);
 - Gather and quantitatively assess workplace injury/illness data designed to identify work-related injury and illness trends and associated WC costs;

- Initiate a campaign to focus awareness on the work-related injury and illness trend in an effort to eliminate or reduce development of subsequent similar trends (e.g., advise management where to concentrate injury and illness prevention efforts);
- o Determine if an OU's OSH program is developed in accordance with the requirements set forth in EO 12196; 29 CFR Part 1960; and
- o Determine if the OU's OSH program is implemented effectively (as described in the Management Review section below).
- 2. Ensure effective tracking and implementation of corrective actions by their assigned completion dates;
- 3. Coordinate the relationship between OSH and WC programs;
- 4. Engage OS leadership, management, supervision, and CDSOs to make sure that employees adhere to safety rules and regulations;
- 5. Promote increased OS employee engagement and participation in the OS OSH program by developing and distributing safety-related communication and promotional materials;
- 6. Prepare the OS annual occupational safety and health report and associated documentation (e.g., list of OS establishments and list of OS OSHA recordable accidents) for inclusion in the DOC annual report for submission to OSHA as required by applicable OSHA regulations (29 CFR 1960.71(a));
- 7. Assist OS offices (operating units), upon request, with detailed guidance on the implementation of the OSH program;
- 8. Notify the OOSH Director and responsible OU leadership of any significant safety and health issue or unresolved hazard (unsafe or unhealthful working condition);
- 9. Assist supervisors in investigating accidents involving their employees, to identify causal factors and initiate appropriate corrective actions to prevent recurrence;
- 10. Assist employees and supervisors in using ECOMP to file work-related injury or illness reports and WC claims;
- 11. Conduct and/or coordinate (upon request and as needed) safety and health training for managers, supervisors, CDSOs, and employees;
- 12. Receive, investigate and act on employee hazard (unsafe or unhealthful working condition) reports; and
- 13. Conduct and/or coordinate ergonomic evaluations, and facilitate completion of special indoor air quality studies and surveys.

- d. **OS Organizational Leaders and Office Directors:** Organizational leaders and office directors are responsible for providing a safe and healthful workplace for their employees, and for ensuring implementation of an appropriate OSH program within their units, in conformance with the requirements specified in this bulletin, including:
 - 1. Implementing measures to prevent stakeholder work-related mishaps, incidents, accidents or near misses;
 - 2. Developing, distributing, and, or posting safety-related communication and promotional materials designed to: increase employee awareness of safety and occupational health matters; reduce incidents/accidents and injuries among stakeholders; encourage safe practices; and eliminate work hazards and health risks. Examples of useful information channels include, but are not limited to: posting of safety notices, posters (including the required OSHA Poster Occupational Safety and Health Protection for Employees of the U.S. Department of Commerce), hazard alerts, notices of unsafe or unhealthful working conditions (29 CFR 1960.26(c)(3) and (4)); posting of safety and occupational health goals and results; and posting about the OSH program challenges and initiatives;
 - 3. Undertaking the inspection and/or assessment of work areas and operations, and implementing timely abatement of hazardous conditions identified during the inspection of work areas and operations;
 - 4. Designating and appointing a safety and health specialist or CDSO (to provide continuous coverage) for the OU and providing him/her with adequate resources, professional training, and authority to implement the OSH program in the organization;
 - <u>Note</u>: Appropriate safety training for the CDSO should occur within the first few months but no later than 6 months after appointment/assignment to safety duties, ensuring competent safety coverage for all employees impacted by the program. Examples of training courses offered by the OSHA Training Institute (OTI) include: OSHA 10-Hour or OSHA 30-Hour and OSHA 6005 or 6010 Occupational Safety and Health Course for Other Federal Agencies. The OTI courses are open to Federal, state, and local agency employees and do not have a tuition fee.
 - 5. Ensuring the ready availability and stakeholder access to adequate procedures and training for response to emergencies (e.g., Occupant Emergency Plan (OEP)).
- e. Collateral Duty Safety Officer (CDSO) and professional safety representative (e.g., HCHB/OFEQ Safety Manager): The CDSO and professional safety representative have the following duties and responsibilities:
 - 1. Providing safety and health training for employees, including specialized job safety and health training appropriate to the work performed, to ensure that employees have the knowledge and skills necessary to fulfill their occupational safety and health obligations;
 - 2. Providing adequate training for response to emergencies;

- 3. Conducting annual inspection and/or effectiveness assessment of all work areas and operations to assure safe and healthful working conditions, and retaining inspection records for 5 years.
- 4. Becoming a competent CDSO by completing professional training (OSHA web-based training: 6008 Introduction to OSHA for other Federal Agencies (CDSO training)).
- 5. When requested to do so (i.e., by the OSSPM or other relevant official), distributing safety-related communications and promotional materials in a timely manner to stakeholders in his/her organization.
- 6. After the inspection, assisting the official in charge of the work area to undertake abatement of hazardous conditions (unsafe or unhealthful working conditions) identified during the inspection. The abatement of the hazardous conditions will be based on their risk rankings. In the event the supervisor or other official in charge of the workplace needs assistance to undertake full abatement, that official shall promptly contact the OSSPM and other responsible OU managers, who shall assist the abatement effort.
- 7. Undertaking implementation of DAO 209-3, "Injury, Illness, Accident/Incident, Fatality and Motor Vehicle Accident Reporting and Investigation" (based on 29 CFR 1904):
 - Using ECOMP to record work-related accidents, injuries, and illnesses. (ECOMP maintains all required records including OSHA Form 301, Injuries and Illnesses Incident Report, OSHA Form 300, Log of Work-Related Injuries and Illnesses, and OSHA Form 300A, Annual Summary of Work-Related Injuries and Illnesses);
 - o Reporting to OSHA and OOSH within 8 hours any work-related fatality;
 - Reporting to OSHA and OOSH within 24 hours any work-related, inpatient hospitalization of one or more employees, amputations, and losses of an eye.
 - <u>Note</u>: Emergency room visits do not need to be reported unless the individual is admitted as an inpatient.
 - o Assist employees and supervisors using ECOMP to file work-related injury or illness reports and WC claims.
- 8. Posting prominently (in a conspicuous place or places where notices to employees are customarily posted) the most current OSHA poster Occupational Safety and Health Protection for Employees of the U.S. Department of Commerce, which informs employees of their rights and responsibilities; and
- 9. Undertaking completion of workplace hazard assessments to determine if hazards (unsafe or unhealthful working conditions) are present (or are likely to be present), which necessitate the use of PPE, and select the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment.

- f. **Supervisors:** OS supervisors have the following responsibilities and duties:
 - 1. Ensuring that their employees comply with OSH program's requirements;
 - 2. Not discriminating against employees who exercise their rights under the Act;
 - 3. Initiating proper action to correct hazards (unsafe or unhealthful working conditions), and complying with applicable safety regulations and best practices;
 - 4. Ensuring prompt investigation, reporting, and recordkeeping of all mishaps, incidents, accidents (including vehicle accidents) or near misses (by implementing DAO 209-3, 29 CFR 1904, and using ECOMP) involving their stakeholders;
 - 5. Completing the **DOC OSH Program Orientation Training Presentation**;
 - 6. Conducting work area hazard assessments to properly select and provide approved PPE to employees, and ensuring its proper use;
 - 7. Providing well-maintained and hazard-free tools and equipment appropriate for the work operations being performed;
 - 8. Providing for required medical examinations and evaluations when appropriate (e.g., in the event of work-related injury or illness; use of respirators; exposure to noise levels exceeding OSHA's permissible exposure limits, etc.);
 - 9. Incorporating safety standards in employee performance plans, consistent with the employee's assigned responsibilities and authority; and
 - 10. Providing appropriate safety and health training for employees, including response to emergencies and specialized job safety and health training appropriate to the work performed by the employee.
 - 11. Assisting employees in using ECOMP to file work-related injury or illness reports and WC claims.
- g. **Employees:** OS employees have the following rights, responsibilities, and duties:
 - 1. Complying with applicable OSHA and OSH program requirements;
 - 2. Reporting workplace hazards without fear of reprisal;
 - 3. Requesting inspections of the workplace by appropriate safety officials;
 - 4. Declining 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 coupled with a reasonable belief that there is insufficient time to seek effective redress through normal hazard reporting and abatement procedures (29 CFR 1960.46);

- 5. Not being subjected to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthy working condition;
- 6. Having the right to participate in the OSH program;
- 7. Completing the **DOC OSH Program Orientation Training Presentation**;
- 8. Reporting all injuries, mishaps, incidents, accidents, or near misses to their supervisor as soon as they occur. Using ECOMP for filing OSHA Form 301, Injury and Illness Incident Report. The reporting requirement applies to damage to OS property.

MANAGEMENT REVIEW: The DASHO and organizational leaders (top management) shall, at intervals that it determines, review the OSH program to ensure its continuing suitability, adequacy, and effectiveness. The OOSH Director assisted by the OSSPM shall ensure that the necessary information is collected to allow management to carry out the management review and evaluation process. The management review shall also address the possible need for changes to policy, objectives, and other elements of a health and safety management system, in light of health and safety audit results, changing circumstances, and the commitment to continual improvement. The management review and evaluation shall be documented.

EFFECT ON OTHER ORDERS and HR BULLETINS: This HR Bulletin is designed to operate under the authority and as an extension of the core DAOs underpinning and directing the operation of DOC's occupational safety, health and WC programs (DAO 209-3, DAO 209-4, and DAO 202-810). It is also designed to be compatible with and supplemental to other DOC and OS OSH policy documents such as administrative orders and HR Bulletins, and is not intended to effect or conflict with any such OSH policies. In the unlikely event there is a conflict, requirements of the core DAOs that direct the operation of DOC's OSH and WC programs have precedence.

REFERENCES:

- a. OSHA Recommended Practices for Safety and Health Programs
- b. Commerce Connection: OOSH Landing page
- c. OOSH <u>Directory of Services</u>, <u>How to Instructions and Webpages</u>
- d. Commerce Safety and Health Topics, Tools and Resources Webpage
- e. DOC Supervisors' Safety Responsibilities Webpage
- f. Report of Work Area Safety and/or Health Hazards Webpage
- g. Workplace Safety and Health Inspections Including OSHA Inspections Webpage
- h. Workplace Safety Office Safety Webpage
- i. Job Hazard Analysis (JHA) Template for Office Centric Work Areas
- i. Workers' Compensation (FECA) Tools and Resources

k. What should I do if I am injured or become ill while at work?