Name of Agency: Department of the Navy (Navy and Marine Corps)
Address: 1000 Navy Pentagon, Washington DC 20350
Number of Federal civilian employees covered by this report: 200,638[1]

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AGENCY NARRATIVE OF SELF-EVALUATION

I. ASSESSMENT OF OCCUPATIONAL SAFETY & HEALTH PROGRAM ACTIVITIES AND EVENTS.

a. Federal Government-Wide & Presidential Initiatives.

Continuity of Operations (COOP) Plans.

Policy Documents: Department of the Navy (Navy and Marine Corps) comprehensive Continuity of Operations (COOP) requirements are provided in the Navy's OPNAVINST 3030.5B, *Navy Continuity of Operations Program and Policy*[2] and, for Marine Corps, MCO 3030.1, *Marine Corps Continuity Of Operations (Coop) Program*[3]. These policy documents guide the development, implementation and periodic review, and updates to emergency response plans.

Continuity of Operations Facility Requirements: OPNAVINST 3030.5B also calls for risk management to be applied as a "risk-based framework" across all continuity of operations efforts to: identify and assess potential hazards, determine acceptable levels of risk, and prioritize and allocate resources across activities. OPNAVINST 3030.5B outlines the following requirements for designated continuity of operations (COOP) sites: (1) COOP sites must be accessible and available throughout all-hazard disasters and emergencies; (2) COOP sites must comply with the Americans with Disabilities Act (ADA) requirements and Department of Justice ADA Standards for Accessible Design; (3) personnel and security provisions and procedures must be integrated into COOP site planning and execution, including Active Shooter training; (4) commands must develop and update a COOP site plan, test the plan annually, and incorporate lessons learned into

[1] Department of Labor/OSHA, *Federal Agency Injury and Illness Statistics by Year, 2013*, https://www.osha.gov/dep/fap/statistics/fedprgms_stats13_final.html
[2] OPNAVINST 3030.5B, *Navy Continuity of Operations Program and Policy,* 20 October, 2009, http://doni.daps.dla.mil/Directives/03000%20Naval%20Operations%20and%20Readiness/03-00%20General%20Operations%20and%20Readiness%20Support/N3040.5D.pdf
[3] MCO 3030.1, *Marine Corps Continuity Of Operations (Coop) Program,* 26 July, 2010, http://community.marines.mil/news/publications/Documents/MCO%203030.1.PDF

the plan as appropriate; (5) commands must provide COOP site lessons learned to the Naval Operational Medical Lessons Learned Center.

Communication during an event: Wide Area Alerts Network (WAAN), Base-Wide Alert Systems (Big Voice), and fire alarm systems are positioned to deliver communications to affected communities during an event. WAAN notices provide messages via electronic mail and cellular phone alerting personnel of impending dangers or threats. WAAN notices provide precise instruction on how employees should respond, i.e., remain in place, report to designated areas, or provide the most efficient partial or total evacuation routes. Big Voice alerts all personnel during an event. Base fire alarm systems have been upgraded in many locations to provide direct real time communication to building occupants through mass notification audio, visual strobe, and text display panels.

Success Story: Several branch COOP plans were executed during the September 16, 2013 shooting incident at the Naval Sea Systems Command (NAVSEA) Headquarters facility. NAVSEA Headquarters was able to account for all NAVSEA Headquarters personnel within eight hours of the incident's onset. NAVSEA's Continuity Planning Division was able to execute its local functional area COOP plan to resume the Command's number one Mission Essential Function within four hours of the incident's onset. Specifically, command and control of organizational resources (people and assets) was enabled through established memoranda of agreement between multiple organizations both internal and external to NAVSEA. The Department of the Navy immediately identified a temporary facility for NAVSEA Headquarters personnel to convene and operations to resume. COOP planning resulted in continuity of key command functions during the shooting incident.

Challenges to COOP Planning:

- The primary challenge to implementing changes to COOP plans is the lengthy stakeholder review process. Maintenance of current and fully compliant local COOP plans is sometimes difficult due to the revision frequency and process required by higher Headquarters or Departmental COOP guidance documents and instructions. Ensuring that subordinate commands have updated COOP plans, and drill their COOP plans annually (or when there is a significant change) remains a challenge for Headquarters commands. For example, plans should be updated when personnel turn over. In addition, the ongoing support of the Commander and Headquarters leadership is necessary for effective COOP Team exercise. A second challenge is the inability to account for the health, safety and welfare of personnel and their families that are isolated due to storm damage or the loss of communication networks (cellular and wired). Navy policy has requirements for ensuring civilians and military family members are accounted for. This accountability system enables the Navy to assist civilians and military family members in times of disaster. For example, Navy personnel, including civilians, are required to update their contact information within the Navy Family Accountability and Assessment System (NFAAS). NFAAS provides a standardized method for the Navy to account, assess, manage, and monitor the recovery process for personnel and their families who are affected by a wide-spread catastrophic event. NFAAS provides valuable information to all levels of the Navy chain of command, allowing commanders to make strategic

decisions which facilitate the return of stability. A third challenge is securing adequate funding and resources to meet all COOP program requirements. This includes: acquisition of Chemical, Biological, Radiologic, and Nuclear monitoring tools, diverted Department of Defense resources for civilian assistance purposes under its role as Defense Support to Civilian Authorities, and decreased COOP preparedness due to 2013 sequestration budget reductions.

Motor Vehicle Safety.

Department of the Navy Motor Vehicle Safety (MVS) Programs.

The Navy and Marine Corps follow traffic safety requirements and guidance found in Executive Orders 13043[4] and 13513[5], Department of Defense (DOD) traffic safety policy[6], and service-specific Navy[7] and Marine Corps[8] instructions. The Navy instruction was revised in 2012 to consolidate policy statements and leadership guidance previously released in two Navy-specific administrative messages and to codify recommendations that resulted from two Naval Audit Service audits of the Navy Traffic Safety Program. Key policy elements include:

- Defining responsibilities of command-designated Traffic Safety Coordinators (TSCs) and Motorcycle Safety Representatives (MSRs);
- Headquarters commands ensuring that subordinate commands assign TSCs and MSRs;
- Enforcement of Personal Protective Equipment (PPE) requirements for motorcycles;
- Establishing motorcycle mentorship programs to promote rider education, safety, and training;
- Coordination of traffic-safety training requirements between Commander, Navy Installations Command (CNIC) and Navy headquarters commands;
- Availability of adequate motorcycle training ranges to support training requirements, coupled with a system enabling commanders to schedule, track and manage training needs for their personnel, and allowing CNIC to provide Navy safety leaders with a quarterly report identifying current status, deficiencies, and corrective actions supporting traffic, motorcycle, and emergency vehicle-operator training programs; and,
- Regional and host installation commanders including tenant-command TSCs, MSRs, and safety representatives in their quarterly Traffic Safety Council meetings.

[4] Executive Order 13043, *Increasing Seat Belt Use in the United States*, April 16, 1997
[5] Executive Order 13513, *Federal Leadership on Reducing Text Messaging While Driving*, October 1, 2009
[6] DODI 5100.04, *DOD Traffic Safety Program*, Change 1, April 2, 2010
http://www.dtic.mil/whs/directives/corres/pdf/605504p.pdf
[7] OPNAVINST 5100.12J , *Navy Traffic Safety Program*, 26 June 2012
http://doni.daps.dla.mil/Directives/05000%20General%20Management%20Security%20and%20Safety%20Services/05-100%20Safety%20and%20Occupational%20Health%20Services/5100.12J.pdf
[8] MCO 5100.19F, *Marine Corps Traffic Safety Program (DRIVESAFE)*[8], 29 November 2011,
http://www.marines.mil/news/publications/Documents/MCO%205100_19F.pdf

Motor Vehicle Accidents (MVAs) and Program Implementation

The Office of Workers' Compensation Programs (OWCP) reports indicate the Navy suffered 23 civilian Lost Time Cases from injuries involving federal civilian on-duty or official business motor vehicle mishaps. The claims included motor vehicle drivers, passengers and pedestrians. CNIC had twenty-one reportable motor vehicle mishaps involving federal civilian employees in 2013; most resulted in minor damage costs to vehicles (Class C and D). The top motor vehicle mishap trends were from driver negligence attributed to lack of attention.

Overall, the Marine Corps Force-level commands (Headquarters-level commands) reported a 14 percent reduction in MVAs during 2013. Marine Corps Force-level commands also saw the reporting and tracking of civilian MVAs increase by 51.5 percent. Of the reported mishaps, 23 resulted in minor first aid type injuries; the remainder did not result in an injury.

The Department of the Navy uses a multi-pronged approach to reduce the frequency and severity of motor vehicle mishaps and injury outcomes. Training and education are the cornerstone of this effort, addressing: specific vehicle types; initial and refresher training courses; supervised driving experience; certification procedures; driving restrictions for operators awaiting training and certification; frequency and content of refresher training; and remedial training for observed undesirable driving behaviors. All personnel, military and civilian, convicted of serious moving traffic violations (i.e. reckless driving, driving while impaired, speeding, following too closely, and failure to yield), or who have been determined to be at fault in a traffic mishap while operating a government-owned/leased vehicle, on or off a DoD installation, must complete an approved driver improvement training course. Numerous safety stand-downs were held addressing negative MVA trends.

Compliance with Executive Orders 13043 and 13513

Navy and Marine Corps traffic safety policies require all persons, military or civilian, operating or riding in any government motor vehicle, on or off base, to wear seat belts; and for all persons, military or civilian, operating or riding private motor vehicles (PMVs) on a military installation, to wear seat belts. Additionally, military and civilian employees are required to wear seat belts during on-duty operation of PMVs, whether on or off-base.

The Navy and Marine Corps strictly and aggressively enforce seat belt use requirements. Installation and base safety offices conduct random and frequent seat belt surveys, focusing on those vehicles operated aboard Navy and Marine Corps installations, bases and stations. A minimum of one seat belt survey per month is required with results reported through the chain of command, and discussed as an agenda item during Installation/Base Commanders quarterly safety councils. Seat belt surveys are joint efforts between safety, military law enforcement, and transportation dispatch personnel. In addition, each major command is required to submit a consolidated annual seat belt survey report. As a result of these policies, visitors to Navy and Marine Corps installations are the most commonly cited violators for not wearing seat belts. The Marine Corps continues its tough stance on non-compliance with the seat belt policy: the penalty for non-compliance is a mandatory loss of driving privileges on the installation for a minimum of seven (7) days. An increasing number of installations are adopting policies more

stringent than Department of the Navy requirements. As a result, Marine Corps reports a seat belt compliance rate regularly above 98 percent of vehicle operators and passengers driving on base.

CNIC regional safety offices also conducted Seat Belt Usage and Distracted Driving Surveys on all Navy installations to evaluate the effectiveness of the command education and enforcement initiatives until budget restrictions resulted in a suspension of these surveys. Periodic surveys are unannounced and were conducted jointly with Naval Security Departments as personnel drove on/off military bases.

Navy and Marine Corps traffic safety policies prohibit the use of cell phones and texting while driving. Users are required to safely pull over and park before answering or using a hand held device. Law enforcement, on patrol or at the gates, along with the chain of command, aggressively enforces this policy aboard Department of the Navy installations. Drivers who receive moving violations while operating motor vehicles are required to appear before a military traffic court magistrate where a point system is used to suspend or revoke driving privileges for drivers convicted of minor traffic offenses.

Hand held mobile device policy and compliance is a topic discussed prior to each holiday and liberty period, and during safety stand-downs held by units. Regular training and public awareness campaigns are conducted at all installations to raise traffic safety awareness. Specific awareness initiatives include base newspaper articles, safety stand-downs, and regular promotion by supervisors.

Traffic Safety Programs and Initiatives

Navy and Marine Corps drivers, both fleet and non-fleet drivers, and occupants, whether operating or riding in official or in or on private conveyances, benefit equally from targeted national and service-specific driver safety campaigns and programs aimed at seat belt use, distracted driving, driving under the influence, aggressive driving, etc. Examples of campaigns include National 3D (Drunk, Drugged, Driving), Keep What You've Earned, That Guy, Click-it-or-Ticket, Drunk Driving over the Limit, Drive Drunk Get Nailed, Distracted Driving Month (April), Arrive Alive and the National Safety Council's Alive at 25 program. Checkpoints and other stepped-up law enforcement activities are conducted during these campaigns. Local Marine Corps commanders have instituted more stringent policies as appropriate to their traffic environments. These initiatives include active monitoring of the National Safety Council's "Alive at 25" driver's improvement program and mandated cruiser and sport motorcycle operators training with Motorcycle Safety Foundation (MSF) curriculum.

Drivers and occupants benefit from regularly generated traffic safety messages from Navy and Marine Corps leadership. These traffic safety messages include mishap statistics and safe driving tips, and are sent to subordinate commands throughout the Navy and Marine Corps prior to holidays and/or seasonally as appropriate. High volume traffic areas are the central focus for dissemination of promotional material and media, such as permanent road signs posted at base entrances/exits, and electronic marquees. An increasing number of installations have established telephone hotlines allowing third-party individuals to call and report unsafe driving behaviors and conditions.

Navy and Marine Corps personnel operate an array of official vehicles including special purpose vehicles, tactical vehicles, passenger vehicles and vans, emergency vehicles, school buses, heavy equipment, etc. Operator training intensity varies with the type of vehicle and level of risk associated with its operation. For example, fleet passenger vehicle operators who drive passenger cars as their primary duty (8 or more hours a week) attend an approved course of driver improvement instruction at no cost to the individual. For the higher-risk vehicle types or operations, such as 15-passenger vans, school buses, or high speed emergency vehicles, there are more stringent specialized training requirements. Driver training is recorded in personnel records. Fleet drivers receive a designation in writing, and a copy of the designation is stored in their personnel files. Other considerations in selection and designation of fleet drivers include medical fitness, driving experience, driving record, and maturity.

Department of Navy employees assigned duty overseas are licensed through their CNIC Host Nation's Regional licensing program, which provides a minimum of eight hours of traffic safety education. Instruction includes information in local traffic laws/regulations. Personnel assigned Outside Continental United States (OCONUS) are required to pass a written local traffic law and international road sign test, and in some major concentration areas, a practical driving test. Personnel assigned within the Continental United States (CONUS) are provided Traffic Safety information during initial Safety Indoctrination Training. Training must be completed within 90 days of reporting to a new duty station. OCONUS Installation Safety offices also oversee the Navy licensing program for Status of Forces Agreement (SOFA) sponsored civilian personnel. SOFAs are multilateral or bilateral agreements that generally establish the framework under which U.S. military personnel operate in a foreign country, and how domestic laws of the foreign jurisdiction apply toward U.S. personnel in that country.

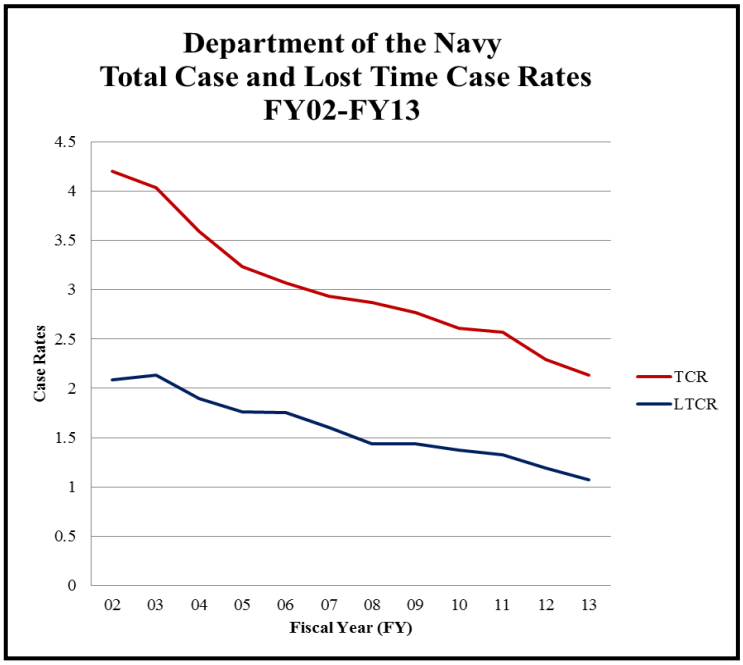
Protecting Our Workers and Ensuring Reemployment (POWER).

During FY 2013, the Department of the Navy met the POWER Goals[9] 1, 2, 3, 5, and 6. Goals 4 and 7 missed the FY 2013 Target with Goal 7 missing the established goal by 0.2 percent. Goal 6 improved from red to green as compared to FY 2012's performance. POWER Goals 1, 2, and 3 are safety-centric and the Department's sustained and significant mishap reduction outcomes are a result of a relentless, collective, all-hands focus on safety, horizontally and vertically, within the organization. The Department believes this aggressive stance has produced results, and these efforts – proven safety policies, programs, initiatives, and dedication – will continue to positively affect worker safety. A number of these policies, programs and initiatives are addressed in Appendix 4.

[9] Protecting Our Workers and Ensuring Reemployment (POWER) Initiative Goals - http://www.dol.gov/owcp/dfec/power/POWERMemofromSecretarySolis.pdf

	POWER Goal	FY 2009 Baseline	FY 2013 Target	FY 2013 Actual	Target vs. Actual (%)	Change from FY 2012 (%)
1	Total Case Rate	2.77	2.27	2.13	-6.2	-7.0
2	Lost Time Case Rate	1.44	1.18	1.07	-9.3	-10.1
3	Analysis of Lost Time Injury and Illness Data	*-No numerical goal-*				
4	Timely Filing of Injury and Illness Notices	84.2%	89.48%	84.61%	-5.4	-3.1
5	Timely Filing of Wage Loss Claims	61.4%	80.45%	84.20%	+4.7	+4.2
6	Lost Production Days	34.6	33.6	30.7	-8.6	-10.0
7	Return to Work	85.6%	92.17%	92.00%	-0.2	+1.8

Safety POWER Goals



- Goal 1 - Total Case Rate (TCR)
- Goal 2 - Lost Time Case Rate (LTCR)

The Department of the Navy continues to show remarkable progress in reducing the Total Case Rate (TCR) and Lost Time Case Rate (LTCR) over time. Since FY 2002, the Department has seen a 49 percent decline in TCR and a 49 percent decline in LTCR. The Department of the Navy has shown that through mature and aggressive policies and programs, supported by strong leadership, overseen by dedicated SOH professionals, and exercised by an engaged workforce, the Department now experiences significantly fewer and less severe personnel injuries and illnesses as well as fewer severe injuries and illnesses.

- Goal 3 - Analysis of lost time injury and illness data

An analysis of injury and illness statistics for FY 2013 reveals a continuation in trends noted in previous annual reports, although the number of total cases and injury severity has decreased. Musculoskeletal conditions, back injuries, minor contusions, bruises or abrasions, and hearing loss continue to be the primary types of injury, and represent the majority of costs associated with injuries and occupational illnesses.

During FY 2013, the Department of the Navy continued major initiatives to reduce the frequency and severity of injury and illness from musculoskeletal injuries and hearing loss. The Department is partnering with the Uniformed Services University of the Health Sciences (USUHS) to analyze the top 10 causes of injuries and illnesses in the Navy and Marine Corps over the past 10 years. This includes injuries and illnesses categorized by job series and location, with consideration of worker age as a confounding factor. The results will be used to validate current interventions and identify gaps in intervention strategies.

To better manage noise-induced hearing loss, the Department has embarked upon a life cycle risk management assessment to identify gaps in noise-related research and development, engineering design, program and policy management, and medical and exposure monitoring. In June 2013, the Navy created a Hearing Conservation and Noise Abatement Flag Level Steering Board to drive implementation of the Navy Surgeon General's Strategic Plan, and to support the Chief of Naval Operations' priorities for hearing conservation and noise abatement.

At the local level, safety professionals continue to review local mishaps to identify causal factors on a case-by-case basis, perform trend analysis, and develop recommended injury prevention strategies.

Injury and Illness Case Management POWER Goals

- Goal 4 - Timely filing of injury and illness notices
- Goal 5 - Timely filing of wage loss claims
- Goal 6 - Lost production days
- Goal 7 - Return to work

As noted above, the Department did not meet the targets for FY 2013 POWER Goals 4 and 7, although Goal 7 missed the established goal by just 0.2 percent. Department of the Navy policy[10] directs Injury Compensation Program Administrators (ICPAs) to use the Federal Employees' Compensation Act (FECA) Electronic Data Interchange (EDI) to improve the case management process. Use of this tool is promoted during training of ICPAs, supervisors, and employees, as well as other promotional venues. Despite the progress in lowering the lost production day rate, there is still room for improvement. Reasons cited for missing Goal 7 include failure to charge

[10] Deputy Assistant Secretary of the Navy for Human Resources Memo, *Electronic Filing of Injury Compensation Claims,* 10 November, 2004, http://www.public.navy.mil/donhr/Benefits/WorkersCompensation/Documents/Nov%2010,%202004,DASN%20%20Memo,%20Electronic%20Filing%20of%20Injury%20Compensation%20Claims.pdf

compensation costs to the activity level (no monetary incentive to control costs), and lost control once an employee receives treatment from the local medical community.

The Department of the Navy employs several initiatives to reduce the number of lost time cases. These initiatives include return to work (RTW) programs that provide restricted duty assignments, outreach programs to educate local medical communities about RTW options, use of Department of Labor Office of Workers' Compensation Programs nurses for home visits, multi-disciplinary teams (Human Resources Office/ Injury Compensation Program Administrators, Medical, Safety, Line Management, etc.) to review cases, and use of DoD's *Pipeline Reemployment Program*. Supervisors are encouraged to maintain contact with employees to ascertain their needs and to monitor their recovery. Where limited or permanent medical restrictions render the employee unable to return to their position of record, safety managers (working with supervisors, ICPAs, and occupational healthcare providers) advise management on reassignment strategies to place the employee in an appropriate position.

Telework Enhancement.

Department of the Navy civilian teleworking is governed by DoD[11] and Department of the Navy policies.[12, 13] Many Navy Headquarters and individual commands have implemented additional local telework policies specific to their mission requirements. For example, the Naval Air Systems Command offers two main types of telework arrangements in compliance with the Telework Enhancement Act of 2010: 1) regular and recurring (a work schedule that includes telework two or more days in a pay period), and 2) situational (telework that is approved on a case-by-case basis, where the hours worked are not part of a previously approved, ongoing and regular telework schedule, sometimes referred to as episodic, intermittent, unscheduled or ad-hoc). NAVAIR regulation 12700 was signed in January 2013 and is the NAVAIR policy governing their telework program. The NAVAIR Telework Guide, Safety and Risk checklists, Fact Sheets, and other information are available on *MyNAVAIR* on their Telework COI (intranet web portal). The Naval Reserve Forces Command added web-based telework policy training for supervisors and employees during this reporting period.

DD Form 2946 (Department of Defense Telework Agreement) is the cornerstone of the telework program. The form outlines terms of the telework agreement and expectations for supervisors and employees. It addresses safety, technology and equipment requirements (Safety Checklist), and provisions for home work site inspection by the DoD Component. Telework agreements are reviewed by the supervisor and teleworker and re-validated at least every 2 years, and revised when appropriate, such as when there is a change in a supervisor-employee relationship. Several commands review this program as part of their headquarters oversight process. For example, this is a BUMED Medical Inspector General checklist item: 1) Is there an active telework program

[11] DODI 1035.01, *Telework Policy*, updated 4 April 2012, http://www.dtic.mil/whs/directives/corres/pdf/103501p.pdf
[12] *Department of the Navy Telework Policy* memorandum, 26 May 2011, http://www.public.navy.mil/donhr/Benefits/worklife/Telework/Documents/telework%20in%20the%20DON%20fact%20sheet%20052611with%20DASNmemo.pdf
[13] The Department of the Navy Human Resources Office, http://www.public.navy.mil/donhr/Benefits/worklife/Telework/Pages/default.aspx

operating in the command? 2) What percentage of positions has been reviewed for telework? 3) Number found eligible for telework? 4) Number found ineligible for telework?

Telework provides continuity of operations during a pandemic event or when a normal worksite is closed as a result of natural or manmade emergency situations (e.g., snowstorm, hurricane, act of terrorism, etc.). During FY 2013, the telework program demonstrated its value by enabling prepared employees to conduct regular work functions during the aftermath of the shooting at the Washington Navy Yard and during severe winter storms.

b. Fatalities & Catastrophic Events.

During FY 2013, the Navy experienced eight civilian fatalities and one catastrophic event; the Marine Corps suffered zero. Seven of the eight fatalities were victims of workplace violence from the Washington Navy Yard shooting event. The remaining case involved a civilian pedestrian fatality in FY 2013 that is currently under investigation by law enforcement. The catastrophic event was a fire that occurred at Naval Surface Warfare Center, Crane, Indiana, during testing of large lithium thionyl chloride cells.

OSHA lists nine (9) FY 2013 Department of the Navy fatalities; the Office of Workers' Compensation Programs (OWCP) reported an additional Department of the Navy work-related death to OSHA for an asbestos exposure case out of the Puget Sound Naval Shipyard for which the deceased's widow is receiving FECA death benefits.

c. 29 CFR 1960 Requirements.

<u>Field Federal Safety & Health Councils</u>

The Department of the Navy strongly encourages membership and participation in Field Federal Safety and Health Councils (FFSHCs). Participation and membership vary according to location, from extensive engagement to occasional attendance at FFSHC meetings. In FY 2013, FFSHC participation included Navy and Marine Corps SOH representation from:

- Commander, Pacific Fleet (COMPACFLT)
- Fleet Cyber Command (FLTCYBERCOM)
- Space and Naval Warfare Systems Command (SPAWAR)
- Naval Supply Systems Command (NAVSUP)
- Naval Air Systems Command (NAVAIR)
- Naval Sea Systems Command (NAVSEA)
- Bureau of Navy Medicine (BUMED)
- Commander, Navy Reserve Forces Command (COMNAVRESFOR)
- Naval Facilities Engineering Command (NAVFAC)
- Naval Education and Training Command (NETC)
- Naval Special Warfare Command (NAVSPECWARCOM)
- Commander, Navy Installations Command (CNIC)
- Commander, U.S. Fleet Forces Command (USFF)

- Commander, Naval Safety Center (COMNAVSAFECEN)
- Marine Forces Command (MARFORCOM)
- Marine Forces Pacific (MARFORPAC)
- Marine Forces Special Operations Command (MARFORSOC)
- Marine Corps Logistics Command (MARCORLOGCOM)
- Marine Corps Installations East (MCI-E)
- Marine Corps Installations West (MCI-W)

All commands listed above cite some level of participation in their local FFSHC either directly or through subordinate commands, including several Department of the Navy SOH professionals who chair their respective councils. All commands strongly encourage full-time and collateral duty safety personnel to participate in the councils. Commands encourage their personnel to attend council meetings by allowing personnel to devote time to the meetings, with some commands also covering travel expenses. Several commands indicated that participation fell off during FY 2013 due to operational tempo and limited funds.

Safety & Health Management System Response to the Inspection Process

Department of the Navy commands were inspected thirty-six times by OSHA compliance officers during FY 2013. Citations were written during 26 of the inspections resulting in a total of 87 violations, including 78 Serious and 4 Repeats. Most violations have been successfully abated, and the associated inspection reports closed. None of the violations were appealed.

Navy policy in Chapter 11 of the Navy's *Safety and Occupational Health Program Manual* (OPNAVINST 5100.23G) requires the commander of the inspected Navy Activity, or the Regional Commander on behalf of the inspected Navy activity, to forward a summary report with a copy of such notices immediately to the Naval Safety Center if Federal OSHA officials issue reports or notices of unsafe or unhealthful working conditions discovered during their inspections. The commanding officer is also required to provide information copies to the chain of command having management cognizance.

The Naval Safety Center tracks OSHA citations and posts a spreadsheet that summarizes the citations on its website at http://www.public.navy.mil/comnavsafecen/Pages/osh/SOH_Metrics/OSHACitations.aspx. The spreadsheet allows viewers to drill down and see specifics for each citation written in a given year. For a summary of FY 2013 citations, see http://www.public.navy.mil/comnavsafecen/Documents/OSH/Citations/FY-13_TOTAL_CITATIONS.pdf. The Navy uses the OSHA citations posted on this website to identify program and implementation areas where improvements are needed and to perform trend analyses. The following paragraphs provide information concerning selected inspections.

- The Navy's Fleet Readiness Center (FRC) Command received significant OSHA citations at its FRC Southwest, Mid-Atlantic and East locations related to the presence of toxic metal dusts on work and break room surfaces in their aircraft repair facilities. All citations have been abated.

- Naval Support Activity (NSA) Crane did not receive any OSHA inspections or any Notices of Unsafe Unhealthful Working Conditions. However, it did receive two separate "Notice of Alleged Workplace Hazard" complaints from OSHA that were reported anonymously. OSHA requested that NSA Crane investigate and provide OSHA with the results of the investigations. The investigations revealed no hazards existed and NSA Crane provided positive feedback to OSHA on the complaints. Complaints were closed with no further communications from OSHA.

- There was one employee complaint at Naval Base Kitsap which led to an OSHA visit in August 2013. The complaint was that security police personnel had to direct traffic without proper signs and protection from weather. OSHA cited the need for Class 2 reflective vests. The security polices vests were upgraded to Class 2.

- OSHA detected a mold presence within building #120 at Naval Air Warfare Center Aircraft Division (NAWCAD), Lakehurst, NJ. The building is not a Navy-owned building; it is a Joint Base McGuire, Dix, Lakehurst Host Command Facility, New Jersey. The maintenance is the responsibility of the host Air Force command. Due to the mold presence in areas occupied by NAWCAD Lakehurst personnel, NAWCAD Lakehurst was cited. The Navy requested the Host Command have the mold abated. The Joint Base executed a roof replacement project for Building #120 to correct the source of water which led to the mold problem. Although not part of the OSHA citation, a recommendation was made and approved to include mold remediation of a basement area room under the same contract.

- Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF) received two citations at its Industrial Waste Water Pre-treatment Facility. All work had already been shut down because the shipyard identified the problem far prior to OSHA's investigation. PSNS &IMF used a combination of the OSH and Environmental Deficiency Report process and a critique process (UIPI 8400-901A) to identify and resolve the problem. The response to OSHA stated the process had previously been shut down.

Training of Overseas Federal Employees

The Department of the Navy employs approximately 5,000 civilians overseas in foreign countries and in U.S. territories. All employees working at overseas installations and U.S. territories are afforded the same level of protection and must comply with the same Department of the Navy Safety and Occupational Health (SOH) policy and program requirements as stateside counterparts. However, some sites report they are not in full compliance with Navy-specific safety training requirements for full-time and collateral duty safety personnel. With geographically isolated sites, limited course availability, and decreased travel budgets, forward deployed safety staff at some locations are not maintaining the required minimum level of education and training. Department of the Navy policy requires shore activities not receiving safety services from their host command to establish safety organizations staffed and organized commensurate with the mission and functions of the command. Collateral duty safety personnel working as safety staff in some tenant activities have not met the training and experience

requirements to provide proper safety program management and oversight. Required safety courses provided by the Naval Safety Center are not locally available, and travel restrictions have significantly reduced access to these limited courses. Annual needs assessments for scheduling use of the Naval Safety and Environmental Training Center have not been completely effective. Online offerings of several courses at greater frequency have been helpful.
The Department of the Navy receives oversight for overseas SOH policy and program implementation, e.g. Inspector General Readiness Inspections. The occupational safety and health programs and pertinent training of overseas employees is administered through local Safety Officers who ensure appropriate coordination with host service providers. In addition to generic SOH training, personnel overseas receive training to address local hazards as appropriate, including local driving conditions and requirements. Before employees are sent into an active area of operations, they are evaluated to ensure they are medically fit for the environment to which they will be deployed, and to gather baseline medical information for post-deployment comparison.

The Ship Repair Facility, Japan Regional Maintenance Center (SRF-JRMC), and SRF-JRMC Detachment Sasebo received SECNAV's equivalent of the OSHA VPP Star Status in February 2012; these facilities provided annual self-assessments as part of the certification process. The self-assessments revealed dynamic programs which ensure a high level of employee safety and health. Another way the Navy promotes the safety and health of its overseas employees is through the Chief of Naval Operations Shore Safety Award process. This process includes recognition of industrial and non-industrial commands outside the continental United States (OCONUS).

Whistleblower Protection Program

Department of the Navy policy[14,15] requires commands to establish procedures to protect all Navy and Marine Corps personnel from coercion, discrimination, or reprisals for participation in the SOH program. The policy further requires development of procedures for all personnel to report suspected hazards to their supervisors and or safety and health officials without fear of reprisal including ensuring that employees are aware that they may file, through their appropriate grievance processes, allegations of reprisals for having filed a complaint of unsafe or unhealthy working conditions. All headquarters commands have policies in place that support and promote this overarching policy. During FY 2013, there were no reprisal allegations as a result of filing reports about unsafe or unhealthy working conditions. Many commands, including COMNAVRESFOR, USFF, CENTCOM, US Naval Forces Europe-Africa, COMNAVFOREUR, COMPACFLT, NAVFAC, NAVAIR, and NAVSEA, reported zero allegations of reprisal during FY 2013.

d. Special 29 CFR 1960 Reporting. Not applicable.

[14] OPNAVINST 5100.23G, *Navy Safety and Occupational Health Program Manual*
[15] Marine Corps Order, MCO 5370.8, *Marine Corps Hotline Program*

II. SAFETY & HEALTH MANAGEMENT SYSTEM SELF-EVALUATION.

Overall Assessment.

Agency Safety & Health Management System – Overall Assessment Score				
0	1	2	3	NA
		X		

Summary of Self-evaluation.

The Department of the Navy is making significant strides to implement a Department-wide Safety Management System (SMS). A number of Navy and Marine Corps commands are implementing SMS in some form, with a significant number on the road to full implementation. The establishment of a Department-wide SMS is one of three of the Department's highest priorities. With the promulgation of the *Department of the Navy Safety Program Policy* (SECNAVINST 5100.10K) in final draft, SMS implementation will be a Department-wide mandate for all Navy and Marine activities. The Department SMS policy does not dictate which specific SMS must be used, as long as the fundamental tenets of the SECNAV instruction are met. Department of the Navy SMS implementation is in close alignment with overarching DoD policy, also in final draft, that will require the military departments implement SMS in their activities.

III. GOALS.

The top three Department of the Navy Safety Program improvement goals are: continuing the development of a Risk Management Information System; development and implementation of an enterprise Safety Management System; and, professionalization and rationalization of the SOH Workforce.

1. Risk Management Information (RMI) – In FY 2013, the Department continued to develop the Risk Management Information system to store, link, analyze, and distribute data needed to effectively manage risk, and allow personnel at all levels of the Navy to make more informed risk decisions.

2. Safety Management System (SMS) – The Department of the Navy has the key elements of SMS in place through its policies and programs, but there is no enterprise-level SMS that will allow for standardized SOH performance and measurement across the service. In FY 2013, the Department established the foundational enterprise SMS with emphasis on how initiatives are prioritized, planned and monitored for progress, as well as use of SMS to conduct organizational oversight. A tool to conduct SMS assessments and synthesize enterprise-wide results will be developed. Finally, the avenue and resources by which activity oversight is to be performed will be determined.

3. Rationalize the SOH Workforce - Currently, there is no standardized professional career development pipeline for the Department's civilian SOH workforce of ~1100 personnel, (GS-0018, Safety and Occupational Health (SOH) Management series). The quality and quantity of SOH service delivery is therefore contingent on each individual's qualifications and capabilities. To improve the SOH community proficiency levels across the service, the Deputy Assistant Secretary of the Navy for Safety is developing a centralized catalogue of SOH professionals and establishing clear and consistent proficiency requirements (knowledge, skills and abilities) to expertly support the array of Navy and Marine Corps missions. The end goal is to deliver the right numbers and types of highly proficient SOH professionals to the service through an exacting career development pipeline. The effort is one of the Secretary of the Navy's highest priorities.

APPENDIX 1 - SUBAGENCY OSH CONTACTS

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APPENDIX 2 – FATALITIES & CATASTROPHIC EVENT – SUMMARY REPORT

During FY 2013, the Navy experienced eight civilian fatalities and one catastrophic event; the Marine Corps had zero. Seven of the eight cases were victims of workplace violence from the Washington Navy Yard shooting event. The remaining case involved a civilian pedestrian fatality in FY 2013 that is currently under investigation by law enforcement. The catastrophic event was a fire that occurred at Naval Surface Warfare Center, Crane, Indiana, during testing of large lithium thionyl chloride cells.

OSHA lists nine (9) FY 2013 Department of the Navy fatalities; the Office of Workers' Compensation Programs (OWCP) reported an additional Department of the Navy work-related death to OSHA for an asbestos exposure case out of the Puget Sound Naval Shipyard for which the deceased's widow is receiving FECA death benefits.

Total number of fatalities: 8 Total number of catastrophic events: 1

Fatality/Catastrophic Event Summary Report (Use Box to Report Each Event Separately)

X Fatality Catastrophic Event Work related? Yes ☒ No ☐
Number of employees injured 4 Date of Incident: September 16, 2013
Number of (government) employee fatalities 7 Time of Incident: 0830
Number of (contractor) employee fatalities 5

Description of workplace operations: Administrative

Description of incident: A contractor employee assigned to work at the Naval Sea Systems Command Headquarters, located at the Washington Navy Yard fatally shot 12 employees (7 government and 5 government contractor employees) and wounded four others. NAVSEA Headquarters incurred 3 fatalities, NSWC Carderock incurred 3 fatalities, NAVFAC Headquarters incurred 1 fatality, and contractors incurred 5 fatalities (not including the shooter) in the same mass shooting incident at NAVSEA Headquarters, Building 197.

Analysis of workplace cause: Refer to Navy JAGMAN investigation, DOD and Joint Government Agency Investigations released 18 Mar 2014 for causal analysis. Personnel security and building security issues were identified. Investigation indicated offender had mental health problems.

Corrective actions taken? Yes ☒ No ☐
If yes, please describe: Multiple high level investigations and corrective actions are pending. Corrective actions focus on background and security investigations of personnel. Immediate corrective actions included better security checks at NAVSEA buildings at Washington Navy Yard. Refer to Navy JAGMAN investigation, DOD and Joint Government Agency Investigations released 18 Mar 2014 for further corrective action recommendations.

Programmatic changes made? Yes ☒ No ☐

If yes, please describe: Programmatic changes are being made in the security clearance investigation process.

Fatality/Catastrophic Event Summary Report (Use Box to Report Each Event Separately)

☒ Fatality ☐ Catastrophic Event Work related? Yes ☒ No ☐

Number of employees injured: 0
Number of employee fatalities: 1
Date of Incident: September 26, 2013
Time of Incident: 1257

Description of workplace operations: Naval Station Newport, Rhode Island

Description of incident: Fatal motor vehicle mishap.

A pedestrian (Police Detective Sergeant, GS-07) was struck by pickup truck driven by another DOD civilian employee. Victim was transported to Rhode Island Hospital. Injuries were listed as critical requiring emergency surgery. Victim subsequently died from injuries sustained. Uninjured driver and vehicle were detained by law enforcement. Naval Criminal Investigative Service (NCIS) is currently investigating the incident. Additionally, the U.S. Attorney's office in Providence, Rhode Island, has classified this incident as an open investigation. The Installation Safety Mishap Investigation also remains pending based on when NCIS completes its investigation.

Analysis of workplace cause: Victim was run down by a motor vehicle while standing outside.

Corrective actions taken? Yes ☐ No ☒
If yes, please describe:

Programmatic changes made? Yes ☐ No ☒
If yes, please describe:

Fatality/Catastrophic Event Summary Report (Use Box to Report Each Event Separately)

☐ Fatality ☒ Catastrophic Event Work related? Yes ☒ No ☐

Number of employees injured None
Number of employee fatalities N/A
Date of Incident: 10/23/2012
Time of Incident: 2305

Description of workplace operations: Naval Surface Warfare Center – Crane, Indiana (NSWC-Crane) provides acquisition engineering, in-service engineering and technical support for sensors, electronics, electronic warfare and special warfare weapons. On this date, NSWC Crane was testing large lithium thionyl chloride cells.

Description of incident: A fire occurred during testing of the large lithium thionyl chloride cells.

Analysis of workplace cause: The cause of the fire mishap was the choice to perform the discharge testing of large lithium thionyl chloride cells outside of a test vault. At the time of the incident, half the cells were undergoing a discharge and the other half were at rest. The direct cause of fire was the venting of the cells under test.

Corrective actions taken? Yes ☒ No ☐
If yes, please describe: Initiated review of lithium battery testing standard operating procedures and established certification requirements. Personnel are being retrained to ensure safe, compliant, and quality operations in the future.

Programmatic changes made? Yes ☒ No ☐

If yes, please describe: Programmatic changes in progress. Storage and segregation of battery products; battery hazard identification, controls and briefing; and, article verifications and validation were addressed. Program guidance and battery and test process SOP are in the process of being updated, and stand-downs and process training have been conducted.

APPENDIX 3 - CERTIFIED SAFETY & HEALTH COMMITTEE

PART I: GENERAL INFORMATION

1. Does your agency have an Occupational Safety and Health Committee (OSHC) at the National level? ☐ Yes ☒ No

APPENDIX 4 - SAFETY & HEALTH MANAGEMENT SYSTEM SELF-EVALUATION

I. HAZARD ANTICIPATION & DETECTION

1. A comprehensive, baseline hazard survey has been conducted within the past five (5) years.

0	1	2	3	NA
		X		

The Department of the Navy SOH program pre-dates the establishment of OSHA. The Department of the Navy's baseline hazard surveys, including hazardous material inventories, were completed years ago. The Department continues its journey to safety excellence with the expanded implementation of safety management systems while continuing to maintain its established SOH programs at a high level of performance. As processes are updated, new baselines are conducted in accordance with applicable guidance from the Navy's *Safety and Occupational Health Program Manual* (OPNAVINST 5100.23G) and the *Marine Corps Safety Program* (MCO 5100.29B). This system depends on line managers notifying SOH professionals of the adoption of new processes or changes to existing processes.

2. Effective safety and health self-inspections are performed regularly.

0	1	2	3	NA
		X		

Chapter 9 of OPNAVINST 5100.23G addresses workplace inspections, Chapter 8 addresses industrial hygiene (IH) surveys, and Chapter 7 addresses hazardous material inventories maintained as part of the Navy's *Hazardous Material Control and Management Program*. Navy and Marine Corps commands have established inspection procedures that include inspection of all workplaces and operations by qualified SOH professionals on at least an annual basis with high hazard areas and operations inspected more frequently. These inspections are conducted by members of the in-house SOH office for many of our industrial commands or by members of our higher level installation SOH offices, including workplace inspections, to tenant commands. At some of our sites pursuing Voluntary Protection Program (VPP) Star status, workforce personnel supplement workplace inspections at least quarterly with surveys using checklists approved by SOH professionals. Personnel use the checklists as guidelines for even more frequent review by individual employees of their workspaces. Periodic industrial hygiene (IH) surveys are completed under the supervision of an experienced industrial hygienist. The IH surveys are conducted in accordance with the Navy's *Industrial Hygiene Field Operations Manual* at http://www.med.navy.mil/sites/nmcphc/industrial-hygiene/industrial-hygiene-field-operations-manual/Pages/default.aspx. Additionally, facility and fire inspections are

made on regular cycles. The Navy Education and Training Command (NETC) also perform quarterly reviews of high risk training operations. Employees are encouraged to report hazards when discovered. Such reports are submitted to their supervisors and/or the safety office through the *Employee Reports of Unsafe/Unhealthful Working Conditions* process for investigation and follow-up.

An area which requires improvement is the proficiency of many SOH inspectors and surveyors. OSHA citations during FY 2013 and employee reports of unsafe/unhealthful conditions have occurred in situations where full-time SOH professionals were employed and inspections were completed within the required periodicity.

Marine Corps policy requires the Commandant of the Marine Corps (CMC) Safety Division to conduct triennial assessments of major commands' and installations' SOH programs. All Marine Corps commands are required to conduct annual self-assessments and report quarterly on the Warrior Preservation Status Report (WPSR) compliance with minimum safety program standards. In addition, each Marine Corps higher headquarters organization conducts biennial oversight assessment of subordinate commands. Formal reviews and oversight of U. S. Marine Corps SOH programs are also conducted by the Inspector General of the Marine Corps (IGMC), Inspection Division. SOH self-assessments of buildings/structure and other facilities are conducted and documented by qualified SOH professionals at all installation and tenant work centers, buildings, training facilities, and ranges.

3. Effective surveillance of established hazard controls is conducted.

0	1	2	3	NA
		X		

Hazards identified through the workplace inspection and industrial hygiene processes are addressed in written or electronic reports, and those that cannot be immediately abated are entered into the activity's Deficiency Abatement System for tracking until abatement is complete. The reports are filed with the affected activities for action, medical surveillance, and monitoring, as appropriate. Exposure monitoring plans developed during the IH survey process are developed to ensure controls are implemented and effective. Follow-up workplace inspections are conducted by SOH professionals to verify that completed corrections have been made or that actions addressing specific problem areas were taken. Supervisors are briefed on their safety responsibilities, including day-to-day inspections and corrective actions, and Collateral Duty Safety Representatives conduct periodic safety inspections of their respective workplaces. Designated Fire Wardens conduct weekly walk-thru inspections of work areas to verify ongoing compliance. Within the Naval Air Systems Command (NAVAIR), on site, real time surveillance is supported by supervisors. Job hazard analyses (JHAs) and Operational Risk Management (ORM) Plans are developed by NAVAIR Mission Safety and monitored in real time, primarily for aircraft test programs. Naval Shipyards have specific

work controls, such as task instructions, the OSHE Control Manual, and local safety instructions.

Many Navy and Marine Corps activities receive services from the host installation SOH office that identifies hazards such as confined space, fall hazards, etc. Navy and Marine Corps activities conduct Safety and Occupational Health Management Evaluations (SOHMEs) at least triennially by the cognizant Navy Headquarters/Marine Forces command. During the SOHMEs, the oversight teams validate that commands are actively identifying and effectively controlling hazards. If controls are ineffective, communication and coordination is made with the supporting host Safety Office to resolve any remaining issues.

4. Change analysis is performed whenever a change in facilities, equipment, materials, or processes occurs.

0	1	2	3	NA
		X		

Per Department of the Navy policy, any changes in the workplace that could affect exposures shall prompt a reevaluation. The surveyed activities are required to establish procedures to ensure that the cognizant SOH professional or IH is notified of any such changes. Other examples include:

- NAVFAC engineers perform change analysis during the planning process or for any change to facility, equipment or materials under NAVFAC ownership. Post change analysis is incumbent on the supervisor and personnel who are familiar with the facilities, equipment, materials, or processes. Changes in facilities, processes and materials often occur in Navy and Marine Corps facilities without NAVFAC's awareness. The original design criteria, assumptions, and levels of control may be rendered ineffective, or in some cases increase the hazard presented by the implemented changes.

- NAVAIR safety experts support systems safety and logistical departments to ensure safety reviews and change analysis are properly completed for all major acquisitions. This process is completed via a comprehensive Programmatic Environmental Safety and Occupational Health Evaluation (PESHE) document, or through an Integrated Logistical Assessment or ILA. In the facility arena, changes are monitored and approved through an Infrastructure Business Operations section or IBO, and approved plans, or waivers are issued to the appropriate activity.

- Many commands conduct job hazard analyses for introduction of new machines and tools and new processes. NAVSEA has an effective hazardous material management program where an authorized user list (AUL) is developed to minimize the use of hazardous material, and a thorough review is conducted for introduction of new hazardous material to the activity.

5. Material Safety Data Sheets are used to reveal potential hazards associated with chemical products in the workplace.

0	1	2	3	NA
		X		

The Navy and Marine Corps have effective hazard communication programs, with field activities at varying levels of compliance; some programs serve as models for others to emulate. For example, at Naval Surface Warfare Center Carderock and Ship Systems Engineering Station in Philadelphia, Pennsylvania (under a singular command), the hazard communication program was identified as a Best Practice during a VPP On-Site Review. Material safety data sheets (MSDSs) are used and stored as required for any chemicals used in the work place. MSDSs are reviewed to identify appropriate protections for workers who may be exposed to them during their work day, and recommended precautions are provided for incorporation into local work processes. The annual workplace inspection, as well as the annual industrial hygiene survey, checks the use and availability of MSDSs on a regular basis. Commands are required to ensure the appropriate SOH professionals perform a safety and health review of Hazardous Material (HM) proposed for addition to the command's Authorized Use List (AUL) prior to purchase of the HM. Commands are also required to perform a periodic review of the AUL to eliminate unnecessary HM and substitute less hazardous HM where feasible. Since OSHA's Hazard Communication Standard is now aligned with the Globally Harmonized System of Classification and Labeling of Chemicals, MSDSs are being replaced with Safety Data Sheets (SDSs). During FY 2013, Navy and Marine Corps employees underwent training to highlight changes to 29 CFR 1910.1200.

II. HAZARD PREVENTION & CONTROL

6. Feasible engineering controls are in place.

0	1	2	3	NA
		X		

The Department of the Navy fully applies the hierarchy of hazard controls. If elimination and substitution controls are infeasible, engineering controls are preferred and implemented. Where engineering controls are not feasible, affordable, or do not provide an adequate return on investment, administrative/management controls, and personal protective equipment are put in place. To fund higher cost hazard controls, NAVFAC centrally manages the Navy's Hazard Abatement Program to remove, control, or fully correct the hazardous exposure in the most effective manner.

7. Effective safety and health rules, and work practices are in place.

0	1	2	3	NA
		X		

SOH rules and work practices are in place at Navy and Marine Corps activities. They are current and sufficient for the identified hazards, communicated to all, and the expectation is that everyone will follow established policies and procedures. Requirements are communicated in local instructions, standard operating procedures, business management system processes, etc. General work processes are addressed in training and enforced by supervisors. When followed correctly, these processes are effective at mitigating potential impacts associated with the exposure to hazards.

For example, Naval Shipyards implement task instructions giving specific directions that include safety considerations and guidance in the OSHE Control Manual to complete tasks. For maritime confined space entry, NAVSEA implements the NAVSEA Technical Manual S6470-AA-SAF-010 *Naval Maritime Confined Space Program*. For hazardous Energy Control aboard naval ships while in a shipyard, the Naval Shipyards follow NAVSEA Technical Manual S0400-AD-URM-010/TUM *Tag-Out Users Manual*. Non-compliance with safety rules in a ship repair industrial environment will result in a Trouble Report investigation to determine root causes, and short term and long term corrective actions.

8. Applicable OSHA-mandated programs are effectively in place.

0	1	2	3	NA
		X		

The Department of the Navy has effective programs to comply with OSHA-mandated programs; most program requirements are addressed in the Navy and Marine Corps SOH program policy. Specific programs include, but are not limited to: Asbestos, Bloodborne Pathogens, Confined Space Entry, Energy Control, Ergonomics, Fall Protection, Hazard Communication, Lead, and Personal Protective Equipment, including Respiratory Protection. An integral part of the annual activity self-assessment process is an evaluation of the command's compliance posture. The triennial headquarters SOHME process is required to review compliance with program requirements. Additionally, those Navy and Marine Corps commands actively engaged in OSHA's VPP have demonstrated that OSHA-mandated programs are effectively in place through on site reviews and annual self-assessments.

9. An effective procedure for tracking hazard correction is in place.

0	1	2	3	NA
		X		

Navy and Marine Corps SOH policy requires the official in charge of the operation to take prompt action to correct identified hazards and to implement interim protective measures pending permanent abatement. Those hazards assigned RACs 1, 2, or 3 that require more than 30 days for correction are required to be recorded and tracked in a formal hazard abatement plan that includes the following standard data for each hazard (or logical grouping of similar hazards):

(1) Dates of hazard identification
(2) Location of the hazard(s)
(3) Description of the hazard(s) including reference to applicable standards
(4) Calculated RAC or estimated RAC (with hazard severity, probability of single occurrence, and annual personnel exposure cited separately)
(5) Interim control measures in effect
(6) Description of the abatement action, including estimated cost and completion date
(7) Abatement priority
(8) Closeout statement, indicating completed abatement action and cost, with date of completed action; or process discontinued or worksite vacated.

Many commands use Enterprise Safety Applications Management System (ESAMS) for the recording and administration of all hazard identification and corrections until the hazard is abated. NAVSEA has an effective hazard tracking program. Hazard correction is reviewed by our Commanding Officers, and employee teams contribute to the process where Voluntary Protection Programs are in place.

III. PLANNING & EVALUATION

10. Hazard incidence data is effectively analyzed.

0	1	2	3	NA
		X		

The Navy and Marine Corps have seven instructions addressing the collection and analysis of data related to hazards, including a mishap reporting instruction and the Navy and Marine Corps SOH program policies (OPNAVINST 5100.23G and MCO 5100.29B). Multiple databases are used to capture and analyze this data, which supports the need for the Risk Management Information effort discussed in the Goals section of the main report. Until RMI is functional, commands will continue to use systems such as ESAMS and the Naval Safety Center's Web Enabled Safety System (WESS) to analyze hazard incidence data. As part of the annual compliance assessment conducted by all NAVFAC

commands, hazard data are analyzed to find trends and identify possible corrective actions.

Hazard incidence data are reviewed and regularly analyzed by NAVSEA commands to determine hazard control effectiveness, identify new trends, and adjust prevention strategies. Formal and informal analysis is performed and reported within NAVSEA's field activities, addressed within activity groups (for example Naval Shipyard high hazard working groups), and discussed at Safety Director Conferences attended by NAVSEA Headquarters leadership. Improvement is needed for NAVSEA Headquarters to analyze data received from Trouble Reports and OSHE Communication Forms required by NAVSEA directives that highlight hazards encountered at the field activity level. NETC uses a seven (7) step risk assessment to analyze, plan and mitigate all facets of potential hazards during the planning process.

11. An action plan designed to accomplish the organization's safety and health objectives is in place.

0	1	2	3	NA
		✖		

The Department of the Navy's annual self-assessment process requires commands report their top five areas for improvement. These reporting areas include any combination of program deficiencies, barriers to mishap prevention, and workplace hazards. Self-assessments also include best practices that can be shared across the Department. The self-assessments are reported using a standardized template developed by the Navy's Safety Quality Council (SQC). The template is available at the Naval Safety Center's website at http://www.public.navy.mil/comnavsafecen/Pages/osh/nsar-index.aspx.

The self-assessment process also requires commands develop a program improvement plan to address deficiencies identified during the self-assessment process. Commands monitor the improvement plans throughout the year to ensure progress.

An important part of the self-assessment process is the roll-up of self-assessment results from across the Navy into an overarching aggregate summary. The SQC analyzes the aggregate results to formulate recommended program improvements service-wide. FY 2013 marked the third year of this process.

NAVFAC's SOH strategic plan goals and objectives are placed on NAVFAC's leadership dashboard for regular progress review. Activities that have achieved VPP Star, or are working on their VPP certification, also develop improvement plans that are tracked until completion. Safety corrective actions are sometimes integrated into overall activity business plans.

The Commandant of the Marine Corps published policy regarding SOH policy and posture in the "Commandant's Planning Guidance" and the "Safety & Force Preservation

Policy of the Commandant of the Marine Corps." This policy is intended "to establish and maintain a safety culture throughout the Marine Corps that preserves all resources through risk management, reinforces safe behaviors (both on and off-duty), and results in an enhanced state of combat readiness."

12. A review of the overall safety and health management system is conducted at least annually.

0	1	2	3	NA
		X		

The annual self-assessment process described in the response to Question 11 is the vehicle used to conduct the review of the overall safety and health management system. VPP Star sites submit their annual VPP self-assessment to OSHA annually.

IV. ADMINISTRATION & SUPERVISION

13. Safety and health program tasks are each specifically assigned to a person or position for performance or coordination.

0	1	2	3	NA
		X		

Safety and health tasks are assigned to and led by SOH professionals and other designated subject matter experts across the Navy and Marine Corps, consistent with Department of the Navy SOH policies. Chapters 2 and 3 of OPNAVINST 5100.23G assign specific responsibilities, ranging from headquarters commands and commanding officers to individual employees, while other chapters assign specific responsibilities, such as Confined Space Program Manager or Fall Protection Competent Person.

Department of the Navy policy related to mishap investigation and reporting in several Navy instructions assigns specific responsibilities at the headquarters command and activity level and addresses specific training requirements before personnel can assume these responsibilities.

In the Navy, many commands have implemented local guidance that assigns specific safety roles and responsibilities, such as CNECNAC6FSTAFFINST 5100.1A for U.S. Naval Forces Europe-Africa. Commanding officers at NAVFAC commands sign a letter of designation providing the information as to what safety and health programs are assigned to specific personnel for performance of specific duties. The designation information is recorded in ESAMS in the personnel records. At other commands, line organizations have a safety point of contact to whom safety actions are assigned.

In the Marine Corps, every Battalion and Squadron level unit must have an assigned and trained collateral or additional duty safety manager. Typically, this individual is a Staff

Non-Commissioned or Company Grade Officer. At a minimum, collateral or additional duty SOH personnel are required to attend the 80-hour Ground Safety for Marine Course within 90 days of appointment to the position.

14. Individuals with assigned safety and health responsibilities have the necessary knowledge, skills, and timely information to perform their duties.

0	1	2	3	NA
		X		

Chapter 6 of OPNAVINST 5100.23G provides guidance concerning training requirements for full-time and collateral duty safety personnel, top management, supervisors, and non-supervisory personnel. Other chapters provide training requirements for specific programs, such as respiratory protection and confined space entry, to help personnel meet their assigned safety and health responsibilities. Individual development plans identify specific training required to develop or maintain proficiency. For example, BUMED requires all full-time journeyman level and higher industrial hygienists, IH officers, occupational health nurses, occupational medicine (OM) providers, occupational audiologists (OA), and safety specialists and managers to receive an equivalent of four continuing education units (CEUs) or 40 hours of professional development training annually. All full-time SOH personnel in a training status shall receive an equivalent of eight CEUs or 80 hours of professional development training annually. In addition to training, the Navy makes heavy use of electronic media to provide timely information related to SOH responsibilities. The Command Safety Officer page on the Naval Safety Center's website at http://www.public.navy.mil/comnavsafecen/Pages/osh/SafetyOfficer/Index.aspx provides an example of this.

Some Navy and Marine Corps commands are supported by full-time SOH professionals as well as other subject matter experts to augment the Command's overall SOH program, while other commands rely on Collateral Duty Safety Officers (CDSOs) and BOS safety related services provided by regional safety offices. Our self-assessment and oversight processes reveal that individuals at specific installations sometimes lack adequate breadth of knowledge, skills, and abilities, to adequately manage an effective and compliant SOH program. This challenge is exacerbated by limitations on travel and training, which have prevented on-site assist visits from upper echelons or attendance at a training course. More serious than some of the individual inadequacies, some commands have programmatic challenges obtaining professionals with adequate knowledge, skills, and abilities to manage or serve as the competent (or qualified) person for specific SOH programs– i.e. fall protection, confined space, dive safety, ionizing radiation, scaffolding, excavation and trenching, etc. Commands that employ CDSOs encounter unique challenges related to staff proficiency. CDSOs have short position terms of 12 to 18 months. Many do not receive appropriate training and must rely heavily on BOS safety related services provided by regional safety offices, which are less than adequate in some situations. The Naval Inspector General has identified this as an ongoing concern. During

FY 2013, the Naval Safety and Environmental Training Center increased its offerings of the NAVOSH Program Ashore online course to address this issue. The Department is addressing this deficiency in the coming year as part of a strategic initiative to rationalize the Department of the Navy safety workforce.

15. Individuals with assigned safety and health responsibilities have the authority to perform their duties.

0	1	2	3	NA
		X		

Navy policy in OPNAVINST 5100.23G, requires commands to designate a competent SOH professional with sufficient authority and responsibility to represent and support the headquarters or activity commander in the management and administration of the command safety program. In some instances, the safety officer is placed several layers deep in the organizational structure rather than reporting directly to the commanding officer as required. This can result in a reduction in authority. Where program managers are centrally located and responsible for geographically disbursed field offices, their authority to perform their role is impeded by restrictions on travel needed to perform on-site assessments and mitigation strategies. Marine Corps full-time SOH specialists are qualified through training and years of safety experience, and are appointed in writing for the implementation of their assigned safety program. Each SOH position description requires incumbents to meet the knowledge, skills and abilities of their specific occupational series as published by the Office of Personnel Management. The professional development of these workers is a top Department of the Navy priority.

In addition to SOH professionals, other personnel assigned safety and health duties have the authority to perform their duties. It is the responsibility of the supervisor or person assigning individual actions to adequately explain what is expected. Often the individual has the authority over the work and authority over subordinates. What is missing most often is authority over necessary resources. Unfunded mandates occur frequently, but safety of personnel conducting work is not optional. Employees have the authority to stop work if necessary. They also have the authority to raise issues to higher authority if necessary.

16. Individuals with assigned safety and health responsibilities have the resources to perform their duties.

0	1	2	3	NA
		X		

Part of the annual planning process includes ensuring safety and health personnel have the right resources to perform their duties. Many commands report travel and training

funds have been limited due to sequestration and other issues, which has hampered effectiveness.

17. Organizational policies promote the performance of safety and health responsibilities.

0	1	2	3	NA
		X		

Organizational policies, stated through instructions, Commander Policy Statements, training, performance evaluation components, etc., promote the performance of safety and health responsibilities. Additionally, the Command's performance management system, including annual performance evaluations, standardized performance requirements for supervisors, annual individual development plans, mishap review boards, fact finding investigations, JAGMAN, and litigation reports, as well as disciplinary actions exercised through the personnel departments, promotes every individual's unique SOH program responsibility.

For example, NAVFAC uses business management system processes, which follow the guidance and requirements of OPNAVINST 5100.23G, to convey organizational policies for safety and health. NAVSEA has endorsed OSHA's VPP as its Safety Management System for ensuring the safety and health of our employees. In doing so, NAVSEA goes beyond compliance with Federal Regulation in our goal to encourage its employees to watch out for each other and become an integral part of the NAVSEA Safety Program. Positive cues include people identifying hazards to their supervisors, reduction of mishaps, and filing Trouble Reports of ship building and repair activities.

V. SAFETY & HEALTH TRAINING

18. Employees receive appropriate safety and health training (including those overseas).

0	1	2	3	NA
		X		

Both Navy and Marine Corps SOH policies address SOH training requirements for SOH personnel, top managers, supervisors, employee representatives, and non-supervisory personnel. Navy and Marine Corps employees, including those overseas, participate in Navy and OSHA formal and informal safety training courses. Employees receive training appropriate to the hazards in their worksite, and there is always a safety module in the new employee orientation process. Consistent with Navy and Marine Corps policy, supervisors receive supervisory training. Union representatives also receive training. Training covers various topics applicable to employees including mishaps, traffic safety, motorcycle safety, compensation, SDSs, work procedures, smoking, stress, plans and goals, radiation, etc. HAZCOM training is required to orient all personnel to the

HAZCOM program and training for personnel occupationally exposed to hazardous materials. Activities tailor the training to individual jobs and specific exposures.

Three areas of systemic weakness exist among the industrial workforce – equipment specific training, the experience/knowledge of the individuals performing the training and how it is delivered, and the certification of proficiency or evaluation (and documentation) of the effectiveness of the training. Regarding equipment specific training, there is a growing concern that the equipment (i.e. aerial work platforms, forklifts, power tools, switchgear, boilers, weight handling equipment, etc.) training is generic in nature and that the nuances and manufacturer's specific requirements are inadequately addressed through formal or on the job training. Additionally, in the cases where training is delivered on-the-job, but not through a formal/documented apprenticeship program, the quality of the training (and trainer) is unknown, and effectiveness is not validated/evaluated or documented. Through the use of the SOH Management System, increased focus will be placed on training documentation, and certification of competence will be provided through a supervisory validation process.

As noted in other areas, the ability to train personnel is somewhat encumbered by fiscal initiatives, such as sequestration.

19. New employee orientation includes applicable safety and health information.

0	1	2	3	NA
		X		

Safety Orientation is provided during Command Indoctrination/New Employee training; it includes all required safety topics per OPNAV 5100.23G. In the Marine Corps, Installations Safety Managers or qualified SOH specialists provide safety training (awareness) as part of the Human Resource Office new employee orientation. This orientation is provided for all personnel on the installation, including tenant activities.

20. Supervisors receive training that covers the supervisory aspects of their safety and health responsibilities.

0	1	2	3	NA
		X		

Navy and Marine Corps commands provide management personnel with sufficient training to enable them to actively and effectively support programs in their specific areas of responsibility. This training includes:

(1) An overview of appropriate statutes.
(2) An in-depth examination of management's responsibilities in relation to the region's or activity's safety program. The general emphasis of this aspect of management level training is to ensure that an aggressive and continuing safety program is implemented throughout the region or activity. Training topics include compliance procedures, mishap costs and prevention strategies, and performance standards and evaluation.
(3) A review of applicable Navy and Marine Corps policy on all relevant aspects of safety. A broad understanding of the material addressed in this manual is essential.
(4) An examination of region and activity program goals and objectives. Training also includes a review of local mishap experience, trends and reduction target areas.
(5) An overview of current safety emphasis programs as defined by higher command. Supervisory personnel are defined as military personnel, E-5 or above, and civilian personnel who give direction to one or more military and or civilian personnel. Regions or activities provide training for supervisory personnel and employee representatives that include introductory and specialized courses to enable them to recognize and resolve unsafe and unhealthful working conditions and practices in the workplace.

Additionally, regions or activities provide supervisory personnel with training which includes the development of skills necessary to manage programs at the work or unit level. These skills include the training and motivation of subordinates in the development of safe and healthful work practices and involve the integration of safety with job training. Training for supervisory personnel also includes safety performance measurement (in terms of mishap and hazard prevention and individual employee and supervisor performance), hazard identification and analysis, enforcement of standards, mishap investigation, the use and maintenance of personal protective equipment (PPE), and hazardous material management.

VI. MANAGEMENT LEADERSHIP

21. Top management provides competent safety and health staff support to line managers and supervisors.

0	1	2	3	NA
		X		

Navy policy in OPNAVINST 5100.23G requires commands to designate a competent SOH professional with sufficient authority and responsibility to effectively represent and support the headquarters or activity commander in the management and administration of the command safety program. Commands are either supported by full-time SOH professionals, as well as other subject matter experts to augment the Command's overall SOH program, or by CDSOs and BOS safety related services provided by regional safety offices. Additionally, Navy/Marine Corps Directive (NAVMC DIR) 5100.8, Marine

Corps Occupational Safety and Health (OSH) Program, directs commanders to ensure the installation safety manager or unit safety officer is a trained, qualified SOH specialist to be assigned as a special staff member at command level per MCO 5100.29B. The installation safety manager or unit safety officer reports directly to the commander as the command safety advisor and operates under the administrative cognizance of the deputy commander or executive officer. The safety manager is delegated the authority to ensure the safety office is funded, organized, staffed and maintained.

22. Managers delegate the authority necessary for personnel to carry out their assigned safety and health responsibilities effectively.

0	1	2	3	NA
		X		

In the Department of the Navy, the authority and responsibility for creating and maintaining a safe workplace is delegated down to the lowest supervisory level including the responsibilities of individual staff members to help ensure a safe workplace. Many commands use designation letters to delegate authority necessary to carry out assigned safety and health responsibilities. Service doctrine and policy states in each unit the Executive Officer (XO) or Deputy Commander is responsible for the command's SOH program. Additionally, select qualified installation SOH safety specialists are appointed in writing by Commanders as SOH program managers. These SOH program managers have authority and responsibility for the day-to-day implementation of the SOH program, as well as the authority and responsibility to provide the commander with SOH consultation and advice.

23. Managers allocate the resources needed to properly support the organizations safety and health management system.

0	1	2	3	NA
		X		

Navy and Marine Corps policy requires headquarters commands to ensure SOH professionals in each region and field activity have sufficient authority and responsibility to plan for and ensure funds for the staff, their equipment, materials, and the training required to ensure implementation of an effective SOH program. Per this guidance, resources are allocated to support the organization's safety and health management system, but those resources are inadequate to properly support development and implementation of new initiatives/process improvements, fund upper echelon oversight, and validate manager's internal control program. Commands are required to examine the adequacy of resource levels during the annual self-assessments, and this area is also evaluated during the SOHME process.

VII. EMPLOYEE PARTICIPATION

24. There is an effective process to involve employees in safety and health issues.

0	1	2	3	NA
		X		

Both Navy and Marine Corps policy strongly encourage direct employee involvement in the command's safety councils and committees, to serve as safety representatives, and if need be, file an anonymous report of unsafe unhealthful working conditions (such as the Marine Corps' Any-mouse Program). NAVFAC has found that the most effective safety committees are employee driven. Additionally, as part of the self-assessment process, employees are asked for their input on the effectiveness of their commands' safety program. Employees are encouraged to report an unsafe situation or near miss to both their chain of command and the SOH professional(s) for their command. Participation in OSHA's VPP has been highly effective at engaging employees to influence safety at their commands. Instead of just providing safety for employees, safety offices work with employees to ensure an optimal safety program focused on continuous improvement.

25. Employees participate in the evaluation of safety and health performance.

0	1	2	3	NA
		X		

Employees are given the opportunity to provide safety and health performance feedback during the annual Defense Equal Opportunity Management Institute (DEOMI) survey and other command climate surveys. Employees also have the opportunity to voice questions and concerns at any safety stand-downs. Employee participation is confirmed during SOHMEs and in some instances, random questions are asked of activity personnel concerning how they engage. At other commands, employees participate actively in annual compliance assessments. Additionally, employees participate in focus groups, mishap review boards, all-hands meetings, and unsafe/unhealthful program reviews to help identify various aspects of the safety and health program's performance. Among the Navy and Marine Corps organizations implementing VPP or seeking VPP certification, employee representatives participate in and offer opinions of the performance evaluation as it is developed. They also develop ownership in its execution. Line managers and supervisors are increasingly able to identify the major safety and health evaluation activities undertaken, and to describe how their employees participate in those activities, particularly for activities that are VPP Star or pursuing VPP certification.