



Executives' and Managers' Safety and Health Program and Compliance Guide

Handbook EL-802

June 2009

- A. **Explanation.** This is a complete revision of Handbook EL-802. It addresses changes in the organization, new technologies, and Voluntary Protection Programs.
- B. **Availability.** This handbook is available online on the Postal Service PolicyNet page at <http://blue.usps.gov/cpim/hbkid.htm>.
- C. **Comments.** Address comments or questions regarding the content of this handbook to:

SAFETY AND ENVIRONMENTAL PERFORMANCE MANAGEMENT
EMPLOYEE RESOURCE MANAGEMENT
US POSTAL SERVICE
475 L'ENFANT PLZ SW RM 9801
WASHINGTON DC 20260

Or send an e-mail to one of the individuals listed on the Safety Resources Point of Contact (POC) page at <http://safetytoolkit.usps.gov/resources/resources.aspx>.

- D. **Effective Date.** This publication is effective June 1, 2009.

A handwritten signature in black ink, appearing to read 'Deborah Giannoni-Jackson'.

Deborah Giannoni-Jackson
Vice President

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1 Introduction

1-1 Purpose

The purpose of this handbook is to help Postal Service executives and managers:

- Understand their roles in the Postal Service commitment to safety as a good business practice.
- Get involved in promoting safety programs, recognize and correct unsafe acts, working conditions, and practices.
- Ensure accountability for effective programs in districts, plants, and all of our facilities.

The handbook also includes information on management responsibilities under the Occupational Safety and Health (OSH) Act and on dealing with Occupational Safety and Health Administration (OSHA) inspections and citations.

1-2 Content Summary

Chapter 2 — provides an overview of Postal Service obligations under the OSH Act so that managers understand their legal and Postal Service-assigned responsibilities.

Chapter 3 — provides tools and information managers need to become involved in safety as good business, including policy statements, workplace observations, and performance measurement.

Chapter 4 — provides an overview of the Postal Service safety program, including information on using the Safety, Environmental, and Ergonomic Resources (SEER) Web site and the Safety Toolkit to manage safety and health programs.

Chapter 5 — provides information on working with OSHA, including responding to employee complaints, dealing with OSHA inspections and citations, and managing citations.

Appendix A — Postal Service Executives' Safety and Health Planner.

Appendix B — Executives' and Managers' Safety Observation Checklist.

1-3 References

Key references used throughout this handbook and their URLs are provided below:

- *Employee and Labor Relations Manual* (ELM), Chapter 8, Safety, Health and Environment: <http://blue.usps.gov/cpim/manuals.htm>.
- SEER Web site (and link to the Safety Toolkit and the OSHA Citation Management Tool (OCMT): <http://safetytoolkit.usps.gov/resources/resources.aspx>.
- Postal Employees Safety Enhancement Act (Public Law 105-241): http://www.osha.gov/Other_Docs/USPS/USPS.html.
- OSHA Publication 2098, OSHA Inspections: <http://www.osha.gov/Publications/osha2098.html>.
- OSHA Publication 3000, *Employer Rights and Responsibilities Following an OSHA Inspection*: <http://www.osha.gov/Publications/osha3000.html>.

2 Regulatory Requirements and Postal Service Policy

2-1 Postal Employees Safety Enhancement Act

2-1.1 Change in Postal Service Status as Employer Under OSHA

In 1998, the Postal Employees Safety Enhancement Act (PESEA) changed the status of the Postal Service as an employer under the Occupational Safety and Health (OSH) Act of 1970. Previously, the Postal Service, as a federal agency, had been exempt from the private sector provisions of the OSH Act.¹

2-1.2 PESEA Requirements and the OSH Act

When PESEA became effective, the Postal Service, like most private sector employers in the United States, became fully subject to the OSH Act. This means that OSHA has jurisdiction over the Postal Service in matters relating to employee safety and health. The Postal Service must comply with the OSH Act and OSHA standards and regulations. If violations occur, the Postal Service may be cited, fined, and, in extreme cases, referred for criminal prosecution by OSHA.

PESEA also does the following:

- Amends federal law to prohibit the Postal Service from:
 - Considering compliance with OSHA in determining whether to close or consolidate a post office; or
 - Restricting, eliminating, or adversely affecting any service it provides as a result of paying a penalty imposed under OSHA.
- Prohibits the Postal Regulatory Commission from considering compliance with OSHA in determining whether to increase rates and provides that OSHA compliance shall not otherwise affect the service of the Postal Service.

1. Federal agencies are covered under Section 19 of the OSH Act and Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*, February 26, 1980.

2-2 Postal Service Policy

The Postal Service complies with the OSHA requirements set forth in [2-1](#).

The Postal Service is committed to:

- Developing and promoting safety programs.
- Recognizing and correcting unsafe acts, working conditions and practices.
- Ensuring accountability for effective programs in districts, plants and all of its facilities.
- Promoting safety as part of good business practices.

See *Employee and Labor Relations Manual* (ELM) 811, 813, 818, 819, and 825.

3 OSHA Voluntary Protection Programs

3-1 Purpose

Working with industry and labor, OSHA created the Voluntary Protection Programs (VPP) to recognize and partner with work sites that implement exemplary systems to manage worker safety and health. Managing safety and health systematically has proven more successful than compliance with specific regulations alone in reducing work-related injuries and illnesses.

3-2 The Corporate Program

The Postal Service is a charter participant in the Corporate Program. The objective of this program is to establish an elite category of VPP participation for world-class corporations that have well-established safety and health management systems, uniformly implemented at multiple corporate facilities.

The VPP Corporate Pilot provides more efficient processes for the Postal Service to increase its level of participation in VPP. The Postal Service has more sites participating in VPP than any private industry corporation and all federal agencies combined.¹

3-3 Benefits of Participation

Participation in VPP offers the following benefits to a work site:

- **Employees** — the foremost beneficiaries of OSHA VPP programs. Employees get involved at their work sites and contribute to safety and health. At day's end, employees go home to their families in a safe and healthy condition.
- **Employers** — a reduction in injuries and illnesses leads to a reduction in associated costs.
- **Unions** — labor-management cooperation on safety and health sets the tone for improved cooperation in other areas.
- **Industries** — VPP sites are models of excellence that can influence best practices industry-wide.

1. This claim is correct as of the time of publication of this handbook.

3-4 Requirements for Participation

Candidates for VPP have the following characteristics:

- Management and all unions commit to participating in VPP.
- The site has implemented a comprehensive and effective workplace safety and health management system that includes four essential elements. Subchapter [4-1, OSHA Voluntary Guidelines](#), describes these elements in detail:
 - Management leadership and employee involvement.
 - Work-site analysis.
 - Hazard prevention and control.
 - Safety and health training.
- Note:** By implementing Postal Service policy and Program Evaluation Guide (PEG) requirements, a site will usually fulfill these elements.
- All of the required VPP elements have been in place and working effectively for at least 1 year.
- The 3-year Total Case Incidence Rate (TCIR) and the 3-year Days Away, Restricted, and/or Transfer (DART) Case Incidence Rate are below the most recently published Bureau of Labor Statistics national average for the comparable industry.
- The site has no open OSHA enforcement activities.

3-5 The Application Process

To participate in VPP, sites must submit an application, which is completed in the Safety Toolkit. Additionally, sites undergo an on-site evaluation by an OSHA team to determine their readiness for VPP. Detailed information on the Corporate Pilot, VPP requirements, and Corporate VPP process are available in the VPP section of the SEER Web page.

For Safety Toolkit access information, see [4-8.2](#).

3-6 Contacts

Each area has a VPP coordinator who administers Postal Service participation in VPP. Contact information is available on the VPP Resources Web page. If you are interested in having your site participate, contact your area VPP coordinator.

4 Postal Service Safety and Health Program

4-1 OSHA Voluntary Guidelines

The Postal Service has adopted the OSHA voluntary safety and health program management guidelines provided below:

- a. *Management leadership and employee participation:*
 - Management commitment and employee involvement are complementary.
 - Management commitment provides the motivating force and the resources for organizing and controlling activities within an organization.
 - Employee involvement provides the means through which workers develop and express their own commitment to safety and health protection.
- b. *Workplace analysis (surveys and job hazard analysis, inspections and hazard controls, and employee hazard reporting):*
 - Work-site analysis involves a variety of work-site examinations to identify not only existing hazards, but also the conditions and operations where changes might occur to create hazards.
 - Effective management actively analyzes the work and the work site to anticipate and prevent harmful occurrences.
- c. *Accident reporting, investigation, and analysis:*
 - Reporting and investigation provides for investigation of accidents and near-miss incidents so that their causes and means for prevention are identified.
 - Analysis of injury and illness trends over time provides for identification of common causes and development of preventive measures.
- d. *Hazard prevention and control:*
 - This activity is triggered by a determination that a hazard or potential hazard exists.
 - Where elimination is feasible, hazards are prevented by effective design of job tasks and/or the job site.
 - Where elimination is not feasible, hazards are controlled to prevent unsafe conditions and unhealthful exposure.

- Elimination or control is accomplished in a timely manner.
- e. *Emergency response:*
 - Effective emergency response includes written emergency action plans, training, fire inspections, and first aid.
- f. *Safety and health training:*
 - Effective safety and health training addresses the safety and health responsibilities of all personnel, whether salaried or hourly.
 - Safety and health training is most effective when incorporated into other training about performance requirements and job practices.
 - The complexity of training depends on the size and complexity of the work site and nature of hazards.
 - Effective safety and health training ensures that all employees understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards.
 - Such training ensures that supervisors carry out their safety and health responsibilities, including: (1) analyzing the work under their supervision to identify unrecognized potential hazards; (2) maintaining physical protection in work areas; (3) reinforcing employee training through continual performance feedback; and (4) enforcing safe work practices.
- g. *Motor vehicle safety and driver training:*
 - Effective motor vehicle safety and driver training ensures proper driver selection, training, and supervision, in accordance with Handbook EL-804, *Safe Driver Program*.
 - Such training ensures compliance with U.S. Department of Transportation regulations.

4-2 Postal Service Program

4-2.1 Requirements

Managers must demonstrate a commitment to providing safe and healthful working conditions in all Postal Service–owned and –leased installations and become involved in day-to-day safety performance. They must be held accountable for safety performance and compliance with OSHA standards and regulations.

In facilities that do not have a full-time safety professional assigned, installation heads must designate an Executive and Administrative Schedule (EAS) employee as Facility Safety Coordinator (FSC).

4-2.2 Program Elements

The Postal Service program elements include:

- Management Commitment, Involvement, and Accountability.

- Accident Reduction Plans.
- Program Evaluations, Inspections, and Improvement Plans, and Written OSHA Compliance Programs.
- Engagement of Postal Service Unions and Employees.
- Safe Driver Program.

These program elements are described in [4-3](#) through [4-7](#).

4-3 Management Commitment, Involvement, and Accountability

4-3.1 How to Demonstrate Commitment

The key steps for demonstrating commitment are set forth below:

- **Develop a Written Policy Statement.**

Executives and managers at the area, district, and plant levels should ensure that a current written safety policy statement is in effect. This policy should stress that safety is a line management responsibility supported by safety and health professionals and senior management officials.
- **Establish Personal Communications.**

Executives and managers should:

 - Periodically send memorandums, articles, etc., to targeted audiences highlighting major safety initiatives, success stories, exceptional safety performance, and other safety-related activities.
 - Stress commitment, involvement, and accountability to managers and supervisors.
 - Publicize information on OSHA compliance activities and safety and health program evaluations.
- **Consider Funding Needs.**

During annual budget reviews, consideration must be given to adequate local funding for the safety and health program, as noted in ELM 818, Safety and Health Program Budgeting.
- **Establish Executive Safety and Health Committees.**

ELM 815, Executive and Management Safety and Health Committees, requires executives and managers to establish these committees at the area, performance cluster, and plant levels. Executives should ensure that the committees meet at least quarterly and address the safety program issues required by the ELM.
- **Attend Joint Labor-Management Safety and Health Committee Meetings.**

Executives and managers should attend meetings of the Joint Labor-Management Safety and Health Committee, and:

 - Discuss the safety and health program and their personal commitment.

- Discuss the committee's function and responsibility, their expectations of and support for the committee.
 - Review local initiatives.
 - Review successes and failures.
 - Ask about the agenda, minutes, and recurring items.
 - Review employee complaints and PS Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*, submitted by employees.
 - Review accident data and accident reduction plan performance as compared to established accident reduction targets.
 - Ensure that committee members receive appropriate training.
- **Encourage Employee Participation.**
Managers and executives should encourage and be involved in national and local employee participation programs. Consult the SEER Web site for the latest information on national employee participation efforts. Also see Chapter 3, [OSHA Voluntary Protection Programs](#).

4-3.2 How to Demonstrate Involvement

4-3.2.1 Conduct Safety-Specific Executive and Management Field Visits

Field visits present excellent opportunities for executives and managers to demonstrate their commitment and direct support for doing business safely. Try to make visits solely for the purpose of demonstrating commitment and involvement in the safety process. Suggested activities for these visits include:

- **Talk with employees and supervisors.**
 - Discuss local accident experience and employee concerns over safety hazards.
 - Review procedures for reporting hazards and defective equipment.
 - Talk with Joint Labor-Management Safety and Health Committee members.
 - Ask for success stories to share with others.
- **Meet with safety and other supporting employees.**
 - Discuss your support for the safety function and solicit comments on the effectiveness of the local program.
 - Review interaction between safety and injury compensation functions.
- **Attend safety and health awards ceremonies.** Opportunities include:
 - National Safety Council's Safe Driver Million Mile Awards.
 - Golden Belt Awards.
 - Local ceremonies that acknowledge excellent safety performance.

- **Visit employee orientation, craft safety training, initial level supervisor, associate, or supervisor refresher training.** These activities provide excellent opportunities to discuss:
 - Safety as good business.
 - The safety and health process.
 - Line management responsibility and accountability.
 - Employee rights and responsibilities.

4-3.2.2 **Inspect and Observe**

Managers at all levels must periodically spot check to look for unsafe acts, conditions, and work practices. The Executives' and Managers' Safety Observation Checklist is a good tool for conducting inspections (see appendix A).

4-3.3 **How to Demonstrate Accountability**

4-3.3.1 **National Performance Assessment**

The National Performance Assessment (NPA) provides scorecards that can be used to **monitor performance** of the entire enterprise and individual units across the nation. The scorecards include safety performance criteria, such as OSHA injury and illness rates and PEG scores.

4-3.3.2 **Pay for Performance**

The pay for performance (PFP) program emphasizes the organization's success through objective, **measurable performance indicators** that are aligned at the corporate, functional, and individual levels, and that include safety indicators. Headquarters establishes corporate and unit safety indicators and targets. By implementing effective program management and accident reduction programs, executives and managers can achieve these targets.

Note: Executives and managers are measured on safety program performance.

4-3.4 **Resources**

See [4-8.1, SEER Web Site](#), and [4-8.2, Safety Toolkit](#).

4-4 Accident Reduction Plans

These plans target specific safety indicators (such as slips, trips, and falls) with specific countermeasures. Each year accident reduction plans that target specific safety indicators must be implemented and tracked.

4-5 Program Evaluations, Inspections, and Improvement Plans, and Written OSHA Compliance Programs

- The Program Evaluation Guide (PEG) process is used to measure and improve facility safety programs.
- Inspections identify hazards.
- Improvement plans identify procedures to abate hazards.
- Templates for OSHA-required written programs ensure compliance with specific OSHA standards. Templates are available for programs such as hazard communication, personal protective equipment, and confined space safety.

4-6 Engagement of Postal Service Unions and Employees

Effective engagement includes agreements with unions on specific safety initiatives and promotes employee involvement. Also see Article 14 of the Agreements (contracts) with the national unions. Examples of effective engagement:

- Participation in the Ergonomic Risk Reduction Program and VPP.
- Using the video series, *Safety Depends on Me*, which enables communication with employees on safety and fosters motivation for using safe practices.

4-7 Safe Driver Program

The Safe Driver Program focuses on preventing motor vehicle accidents by providing detailed guidance on how to select and train individuals who will drive vehicles for the Postal Service as part of their job responsibilities. The program also provides guidance on refresher training for Postal Service drivers. For further information, see Handbook EL-804, *Safe Driver Program*.

4-8 Resources

4-8.1 SEER Web Site

The SEER Web site is designed to be used by FSCs, PEG coordinators, VPP coordinators, managers, supervisors, and other employees who are looking for safety, health, and environmental information.

4-8.1.1 Content

SEER provides access to the information and tools needed to manage implementation of corporate-wide safety and environmental programs. The

site provides Postal Service employees with a wealth of safety, health, environmental, and ergonomics information.

Note: The SEER Resources Page is **not** the Safety Toolkit. The Safety Toolkit is a separate tool, used by safety team members for specific tasks (see [4-8.2](#)).

Under Safety Programs, SEER provides a link to the Accident Reduction Center. This site provides the following:

- Guidance and tools for managing accident reduction plans and goals.
- Best practices and countermeasures.
- Tools for data management and accident analysis.
- National Job Safety Analyses for many tasks for local adaptation.
- Safety Inspection Checklists by facility size.
- Written program guides and templates for 10 OSHA standards.
- Guidance and references for safety and health topics such as:
 - Developing Emergency Action Plans (EAPs).
 - Responding to emergencies (e.g., national disasters, suspicious mail, and other threats).
 - Reporting on motor vehicle and industrial accidents
 - Giving safety talks (including sample safety talks on many topics).
 - Participating in Voluntary Protection Programs.
- Information about topics such as mold, emergency eyewash units, roof safety, etc.
- Links to Postal Service safety references (manuals, handbooks, management instructions, etc.).

4-8.1.2 Access

To access SEER:

- Go to <http://blue.usps.gov> (see [Figure 1](#)).
- In the left column, click *Safety and Environmental Resources*.
- On the SEER Web page (see [Figure 2](#)), click on a topic of interest in the left column.
- To display additional information, click on the links on the page or click on the topical text selections in the right column.

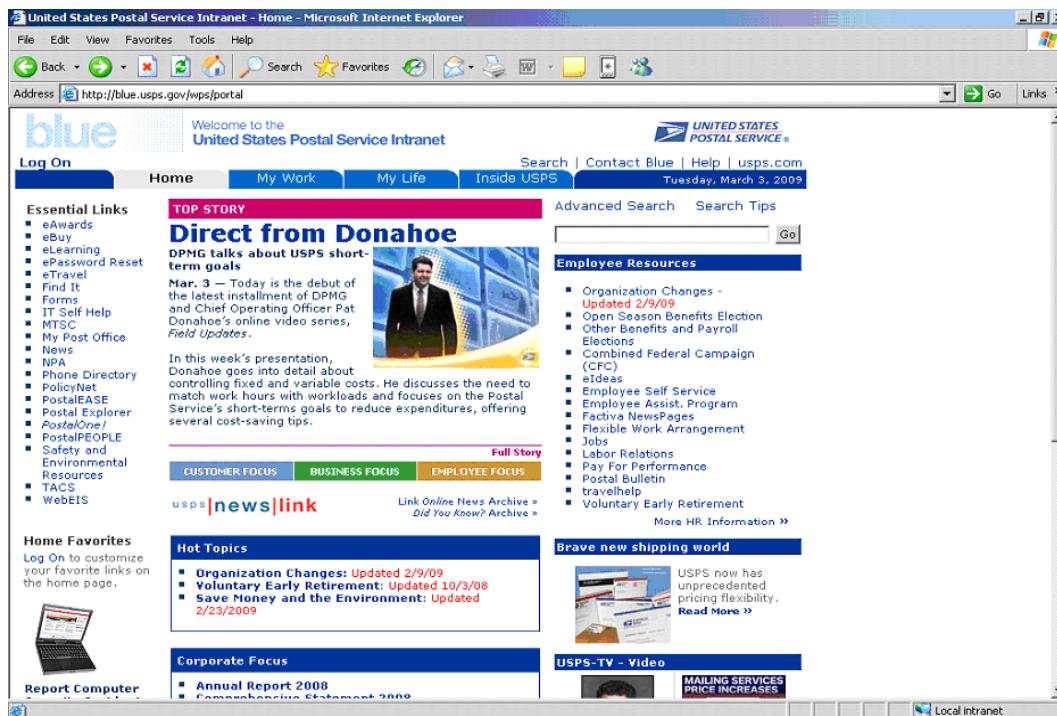


Figure 1
Postal Service Blue Web Page

The screenshot shows the 'Safety, Environmental, and Ergonomic Resources' page. The top navigation bar includes File, Edit, View, Favorites, Tools, and Help, along with a toolbar and address bar.

The main content area has a title 'Safety, Environmental, and Ergonomics Resources'. On the left, there's a navigation menu with sections for Resources Home, Safety Resources, Environmental, and Ergonomics. The Environmental section is currently selected. The center content area displays a 'Welcome to the Safety, Environmental, and Ergonomics Resources Page' message and two 'NEW!' links: 'Information About Recycling at Headquarters' and 'InfoPak - Management of Tritium-Containing EXIT Signs'. A note at the top says 'To download this document right-click here and select "Save Target As..."'. The right side features a 'Quick Links' sidebar with links to various resources like DSA HomePage, Safety Depends on Me, Safety Infopak, Safety Smart, Safety Toolkit, Safety Training Matrix, USPS Publications, Environmental Toolkit, and Site Map.

Figure 2
SEER Web Page

4-8.2 Safety Toolkit

4-8.2.1 Content

The Safety Toolkit (STK), available through the SEER Web page, is a Postal Service application used by safety specialists, safety managers, installation and facility heads, postmasters, maintenance managers, supervisors, PEG coordinators, and VPP coordinators to complete specific tasks. The STK is used to:

- Prepare and manage accident reduction and hazard abatement plans. (Safety professionals use portable HP iPAQ PDAs to record and upload safety inspection findings for abatement tracking.)
- Manage VPP data, program improvement plans, OSHA citations (with the OSHA Citation Management Tool), and employee hazard-report logs.

Executives and managers must become familiar with the performance reports available in the STK. These include:

- Area, performance cluster, and facility-level reports.
- Abatement plans, PEG scores, safety and health program improvement plans, hazard-report logs, and VPP data.

4-8.2.2 Access

STK access is available to permanent EAS employees. The eAccess system grants access based on a user's role. After a request is approved, the user is granted access to selected modules in the STK, depending on the user's assigned role.

To request access:

1. Go to <http://blue.usps.gov>.
2. Type "eAccess" in the URL bar and hit enter.
3. Select "ACE User" and click *Enter Application*.
4. Log on using your ACE login and password.
5. In the "Request Access" box at upper right, click *Applications*, type in "STK," and click *Search*.
6. Click *Safety Toolkit*.
7. Review your "User Details" and update if necessary.
8. Enter the *Request Setup Information*, *Dependent Request Setup Information*, *Request Related Processing Instructions*, and *Manager Information*. (To simplify the approval process, choose the lowest level of access you need in the *Role(s)* item — this means fewer approvals will be needed during the review process.)
9. Click *Next* after all items have been completed.
10. Review "Request Summary."
11. Click *Submit Request*.

Once access is approved, go to the SEER page to access the STK. The link for the STK is under "Quick Links" in the right column. (See [Figure 2](#).)

From the STK opening page, use the left column to locate the module you want to use. Click on the module name and it will display.

The STK Help Module provides a great deal of information on how to use the STK. Key Help Module content includes:

- User's Guide.
- Web Module Movies, an automated tutorial that follows the User's Guide.
- VPP User's Guide.
- Frequently asked questions (FAQs).
- Form for submitting questions about the STK.

The Help Desk Support Number, 1-800-688-0321, is available from 8:30 a.m. to 5:00 p.m. EST.

5 Dealing With OSHA

5-1 Investigating Employee Safety and Health Complaints

5-1.1 Complaints and Inspections

5-1.1.1 Employee Complaints to OSHA

Many investigations and inspections result from employee complaints. The most effective method to reduce employee complaints to OSHA is to ensure that:

- The PS Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*, submitted by employees are handled expeditiously.
- Hazards are abated in accordance with existing Postal Service policy and documented in accordance with the ELM.

5-1.1.2 Handling Complaints Internally

If, for whatever reason, an employee or employee representative still complains to OSHA, there still may be an opportunity to address the complaint internally, as follows:

- OSHA procedures allow for contacting the employer to (1) advise management of the complaint, and (2) request an investigation and correction of hazards by the employer. By responding in 5 working days and correcting any hazards, posting the information, and notifying employees, managers may avoid an unnecessary inspection.
- Managers may also request additional time and dispute complaints with detailed evidence of the conditions. OSHA shares the information obtained from management with the complainants.
- OSHA has wide discretion forego an inspection if OSHA personnel believe the hazard either (1) does not exist or (2) has been abated.

5-1.1.3 NIOSH Health Hazard Evaluations

Based on employee complaints, the National Institute for Occupational Safety and Health (NIOSH) may indicate the intent to conduct a Health Hazard Evaluation (HHE). A manager who receives a written or telephone notification that NIOSH intends to conduct an HHE must immediately contact the Manager, Safety (Area). Managers cannot refuse an investigation or deny NIOSH entry onto the premises, but they can request time to coordinate with the Manager, Safety (Area). A manager should not initiate a

request to NIOSH for an HHE without consulting with the Manager, Safety (Area)

5-1.2 **Steps to Take**

Take the following steps to ensure the expeditious handling of employee safety complaints:

- Ensure that PS Forms 1767 submitted by employees are properly tracked, responded to, and recorded in the STK in accordance with ELM 824.6, Investigating Employee Reports of Hazard, Unsafe Condition, or Practice.
- Hold supervisors responsible for timely response to PS Forms 1767.
- Place the highest priority on responding to requests by OSHA for investigation of employee complaints, as follows:
 - Upon receipt of such a request, notify the installation head and the supporting Safety Office.
 - Make sure the response to OSHA is signed by the installation head and transmitted on time (within 5 working days).
- Notify the Manager, Safety (Area) if NIOSH communicates the intent to conduct an HHE.

5-2 OSHA Inspections and Citation Management – Postal Service Responsibilities

5-2.1 **Executives and Managers**

Executives and managers must do the following:

- Achieve compliance with OSHA standards as part of their overall safety and health responsibilities.
- Lead the OSHA compliance effort.
- Review and be familiar with ELM 825, OSHA Inspections, available at <http://blue.usps.gov/cpim/manuals.htm>.
- Review OSHA guidance on conduct of inspections, employer rights and responsibilities, and other safety and health information available at <http://www.osha.gov>.

5-2.2 **Installation Heads**

Installation heads must do the following:

- Achieve compliance with OSHA standards within the facilities under their control.
- Review and be familiar with ELM 825, OSHA Inspections, available at <http://blue.usps.gov/cpim/manuals.htm>.
- Review OSHA guidance on conduct of inspections, employer rights and responsibilities, and other safety and health information available at <http://www.osha.gov>.

For more information on OSHA inspections and compliance activity see Publication 2098, available at <http://www.osha.gov/Publications/osha2098.html>.

For information on employer rights and responsibilities following an OSHA inspection see Publication 3000, available at <http://www.osha.gov/Publications/osha3000.pdf>.

5-2.3 **Safety and Environmental Performance Management**

Safety and Environmental Performance Management (SEPM), Employee Resource Management (ERM), Headquarters:

- Oversees the citation management process for Headquarters.
- Coordinates responses to citations for violations with the General Counsel and affected Headquarters organizations.
- Provides quality control oversight of the citation information entered in the OSHA Citation Management Tool (OCMT).
- Resolves discrepancies in the information with the responsible safety specialist.
- Performs analysis of the citation information.
- Reports the results of the analysis to key Postal Service personnel.
- Identifies national opportunities to prevent further citations and improve safety and health programs based on the analysis of the citation data.
- Provides on-site assistance in the resolution of citation issues as required.

5-2.4 **General Counsel**

The Postal Service General Counsel:

- Oversees the legal aspects of the citation management process nationally at Headquarters.
- Approves all citation-related correspondence sent to OSHA.
- Prepares all notices of contest and mails them to OSHA.
- Prepares all protective notices and mails them to OSHA.
- Prepares and distributes additional correspondence to OSHA on selected citations as determined on a citation-by-citation basis.
- Provides consultative assistance to SEPM.
- Provides on-site assistance in the resolution of citation issues as needed.
- Accomplishes all required litigation with the Occupational Safety and Health Review Commission and federal courts.
- Resolves discrepancies in the information with the responsible counsel.

5-2.5 **Managing Counsels in Field Offices**

Managing counsels in Postal Service field offices:

- Maintain close coordination with the General Counsel.
- Oversee the legal aspects of the citation management process in the field.
- Approve all citation-related correspondence sent to OSHA.
- Prepare all notices of contest and mail them to OSHA.
- Prepare all protective notices and mail them to OSHA.
- Prepare and distribute additional correspondence to OSHA on selected citations as determined on a citation-by-citation basis.
- Provide consultative assistance to performance cluster and area safety personnel.
- Provide on-site assistance in the resolution of citation issues as needed.

5-2.6 **Maintenance Policy and Programs, Engineering**

Maintenance Policy and Programs, Engineering, Headquarters:

- Assists in the implementation of programs to abate systemic maintenance related hazards.
- Distributes OSHA citation information to appropriate personnel.

5-2.7 **Maintenance Operations (Area)**

The Managers, Maintenance Operations (Area):

- Oversee the abatement of hazards resulting in violations in their area of responsibility.
- Support district and plant managers in the abatement of hazards.
- Assist in the implementation of programs to abate systemic maintenance related hazards.

5-2.8 **Facilities Service Offices**

Personnel in the Facilities Service Offices ensure that processes are in place to ensure prioritization of projects based on OSHA citations and abatement schedules.

5-2.9 **Environmental Policy and Programs**

Environmental Policy and Programs, SEPM, ERM:

- Stays abreast of citation information that may impact the environmental program.
- Identifies additional information needs for the environmental program and coordinates with Manager, OSHA Coordination, to obtain the needed information.
- Distributes OSHA citation information that may impact the environmental program to headquarters and field environmental personnel.

5-2.10 **Safety Specialists and Analysts**

District and plant safety specialists, assigned by the managers of Safety and Health within each performance cluster, enter OSHA inspection and citation data into the OCMT. To perform this task, they must:

- Enter citation information for facilities in their area of responsibility (including Headquarters field units) as soon as they are received, but no later than by COB on the day the citation is received from OSHA.
- Fax or e-mail copies of the citation to SEPM and the General Counsel at Headquarters and to the Manager, Safety (Area), preceding the faxes with a telephone call.
- Keep the citation information current and accurate as hazards are abated and citation management activities progress. Enter this information as soon as these activities are accomplished, but no later than COB that day.
- Enter abatement actions as soon as they are accomplished, but no later than COB that day.
- Keep the Manager, Safety (Area) informed.
- Keep the responsible manager informed.
- Facilitate abatement actions with responsible managers.
- Coordinate all citation-related correspondence to OSHA with SEPM and the General Counsel at Headquarters and with managing counsels, field offices, and Manager, Safety (Area) before transmittal.

5-2.11 **Safety (Area)**

The Managers, Safety (Area) oversee the citation management process within their areas. They:

- Identify facilities, program areas, and procedures within their areas that require improvement and notify management.
- Assist in the implementation of nationally targeted efforts to improve program areas and procedures.
- Coordinate all citation-related correspondence to OSHA with SEPM and the General Counsel at Headquarters and with their area legal staff representative before transmittal.

5-3 The OSHA Citation Management Tool

5-3.1 **About the OCMT**

The OCMT is a real-time application that safety specialists use to record OSHA inspection and citation information. Once safety specialists enter the key information from OSHA citations, the information is made available in a series of views, reports, and charts. OCMT users can view the data or print the presentation-quality reports and charts. The views, reports, and charts present the inspection information in logical, easy-to-understand formats that simplify analysis of the data.

The goal of the OCMT is to provide quick and reliable access to OSHA inspection information so that:

- Managers address citation settlement promptly.
- Managers ensure prompt abatement of hazards.
- Managers see the types of citations their facilities or like facilities receive and take appropriate preventive or corrective action at their facilities.
- Managers can identify trends in the OSHA citations and develop action plans to prevent similar citations at like facilities.
- The Postal Service maintains an accurate electronic record of OSHA citations.

5-3.2 **Access**

The opening screen shows the main view of the citation data year to date, and provides:

- A list of inspections by area and access to the full text of each inspection report via hyperlinks.
- Access to data entry forms for new citations by clicking the *New* tab at the top of the page, as follows.
 - Click the citation number link to display general information on the specific citation.
 - Click the Violations tab at the top of the page to view the details of each violation associated with the citation.
 - Click the reports tab at the top of the page or click the reports module in the left navigation bar.
 - Select OCMT from the drop-down list to display the menu of reports for OSHA citations.

OCMT data is available for analysis using a series of six different summary and detail reports and one chart. The report titles clearly describe the information presented in each of the reports.

To assist users, OCMT offers the following modules:

- *Help* — Provides access to the online user's manual, the toll-free help line, and a quick way for users to send suggestions for improvement to the STK management team.
- *Search engine* — Provides the capability to search the database by key words.

Appendix A

Postal Service Executives' and Managers' Safety and Health Planner

Demonstrate Safety Principle	Activity	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Personal Commitment	Post current policy statement												
	Send memos to targeted employee groups												
	Prepare articles on safety issues												
	Review budget for safety issues												
	Review accident data												
	Establish Accident Reduction Plans												
	Establish an Executive Safety and Health Committee (Area, PC, Plant)												
	Attend Executive S&H Committee meetings (quarterly)												
Involvement in Safety	Attend Joint Labor-Management S&H Committee meetings												
	Conduct field visits												
	Meet with craft supervisor												
	Meet with Safety staff												
	Attend ceremonies (e.g., awards, VPP)												
	Visit orientation and training sessions												

Demonstrate Safety Principle	Activity	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
	Inspect and Observe:								.				
	■ Facilities												
	■ Vehicles												
	■ Driving												
	■ Work practices and behaviors												
	Check paperwork and records												
Accountability	Review PEG data												
	Review inspection data												
	Review accident reduction target progress												
	Review OSHA citations and abatements (in OCMT)												
	Ensure that personnel evaluations include safety performance												

Appendix B

Executives' and Managers' Safety Observation Checklist

When in a facility check for:

- Housekeeping. Are floors free of slip, trip, fall hazards; are storage areas clean and neat?
- Blocked or unmarked exits.* Are all emergency exits marked as exits?
- Are routes to exits clear, unobstructed, and marked with readily visible signs?
- Suspect electrical or wiring conditions.* Are outlets in good condition and free of exposed wires?
- Are extension cords used only for temporary wiring purposes?
- Guarding and condition of mechanization.* Are there missing guards on MPE, nonoperational warning lights?
- Condition of mail transportation equipment. Is mail transport equipment in good condition, free of sharp edges and broken parts?
- Condition of lobbies and customer service areas. Are lobbies and customer service areas neat, clean, and free of slip, trip, and fall hazards, sharp edges, and items that could fall?

Check vehicles for:

- Notice 76, *Expanded Vehicle Safety Check*.
- Accident reporting kits. Are driver daily vehicle inspection records on file and complete?
- Unrepaired and/or unreported damage. Are vehicles in good condition?
- Parking procedures. Are vehicles parked correctly to limit roll away/run away?
- Observe work practices in facilities and on the street for:
 - Handling and lifting. Do employees use proper lifting techniques?
 - Pushing and pulling. Ensure employees push rather than pull equipment.
 - Footwear. Do employees wear slip-resistant footwear that is in good condition?
 - Lockout/tagout procedures.*
- Are records of safety talks available for review?
- Driving. Are semi-annual supervisor driver observations on file and complete?
- Contractor safety performance.*
- Employee postures/hand mechanics.

Check paperwork and records for:

- Required training is delivered and documented.* Are employee training records available for review?
- PS Form 1767, *Report of Hazard, Unsafe Condition, or Practice*, is handled promptly.* Is the Hazard Log maintained in the Safety Toolkit?
- Is the OSHA 300 Log current and is the OSHA Form 300A signed and posted (Feb to Apr)? *
- Are written OSHA programs such as Lockout/Tagout, Hazard Communication, Asbestos Operations and Maintenance, available for review?*
- Is OSHA Poster 2203, *Job Safety and Health Protection*, or OSHA Poster 3165, *You Have a Right to a Safe and Healthful Workplace*, posted?*

*Indicates a critical OSHA compliance item.

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