

NALC Guide to Safety and Health

A Basic Reference for NALC
Local Safety and Health Activists

National Association of Letter Carriers, AFL-CIO - Revised March 2006



National Association of Letter Carriers

William H. Young
President

100 Indiana Ave. NW
Washington, DC
20001-2144
202.393.4695
www.nalc.org

Jim Williams
Executive Vice President

Gary H. Mullins
Vice President

Jane E. Broendel
Secretary-Treasurer

Myra Warren
Asst. Secretary-Treasurer

Fredric V. Rolando
Director, City Delivery

Alan C. Ferranto
Director, Safety & Health

Brian E. Hellman
Director, Life Insurance

Thomas H. Young Jr.
Director, Health Insurance

Donald T. Southern
Director, Retired Members

Board of Trustees:

Larry Brown Jr.
Chairman

Daniel T. Rupp
Randall L. Keller

To All Local Safety and Health Activists:



I am proud to offer you this new NALC publication about workplace safety and health. The NALC Guide to Safety and Health is intended for all of the local union activists who labor to create a safer workplace for letter carriers.

The letter carrier's job is physically demanding and unfortunately, many letter carriers sustain occupational injuries. NALC believes that we can improve on-the-job safety by working actively on safety issues at the local, regional and national levels and by educating letter carriers about safety and health issues.

This guide provides a trove of fundamental information about workplace safety and health issues. The materials are intended to give new safety activists a head start and provide a useful reference for those with more experience and knowledge.

NALC believes that every member should take responsibility for safety in the workplace. After all, it is letter carriers who suffer injury when safety measures fail. Local activists can get active in safety and health issues, join a local safety and health committee and to receive training on committee functions. Your efforts will be valued by the letter carriers we all serve.

Sincerely,

William H. Young
President

NALC Guide to Safety and Health

Introduction

This NALC guide is intended for members of local joint safety and health committees, and for other NALC activists interested in safety and health issues. It provides basic information about many safety-related issues for letter carriers.

On-the-job safety and health are priorities for NALC. This union encourages all NALC shop stewards, branch officers and other activists to help create a safe and healthful workplace for letter carriers.

NALC believes that working jointly with management on safety and health issues is the best way to prevent accidents and injuries. Our National Agreement, postal handbooks and manuals, and the OSHA law all support efforts by employees and managers to create safe and healthful workplaces.

This guide is intended to make the topic of workplace safety and health more accessible to NALC activists. It provides the most vital, basic materials that a union activist needs to approach the subject. It also tells where to find many of the additional resources available to members who wish to learn more.

Materials

The following outline describes the safety and health reference materials within each of the tabbed dividers.

Tab 1 Article 14 and Supporting JCAM Material

Cooperative framework. Article 14 and the related material in the JCAM (NALC-USPS Joint Contract Administration Manual) set forth the basic safety and health framework for the Postal Service and NALC. Article 14.1 expresses two main principles: (a) it is management's responsibility to provide safe working conditions; and (b) it is the union's responsibility to cooperate with and assist management in its efforts to fulfill this responsibility.

Local joint safety and health committees. Article 14.4 requires management to establish a local safety and health committee at each installation “having 50 or more employees.” NALC appoints the sole letter carrier member on this committee, which should have equal management and union representation. At installations with fewer than 50 employees, the language encourages installation heads to establish a similar committee in response to a union request. This section also provides that where no local safety committee exists, union representatives may place safety and health issues on the agenda for labor-management meetings.

Local committee responsibilities. Article 14.8.A outlines the local safety and health committee’s primary responsibilities, which include:

- Promoting the cause of safety and health in the installation;
- Reviewing the progress of accident prevention and health;
- Investigating major accidents which result in disabling injuries;
- Identifying unsafe work practices and assisting in enforcing safety rules;
- Reviewing local safety and health rules, suggestions, safety training records, reports of unsafe conditions or practices, local dog bite prevention efforts, and the list of hazardous materials used at the installation.

Required training for local committee members. All NALC members of local joint safety and health committees should request training. Article 14.8.B requires management to provide such training (“an orientation”) to committee members, and lists the subjects to be covered. (Also see Tab 2, USPS Handbooks *EL-809* and *EL-809-T*, below.)

NALC safety and health activists should read and be familiar with all of Article 14 and the related JCAM material.

Tab 2 USPS Joint Labor-Management Safety and Health Committee Training

Tab 2 contains two USPS handbooks which address local safety and health committees:

- (a) Handbook EL-809, *Joint Labor-Management Safety and Health Committees*

- (b) Handbook EL-809-T, *Joint Labor-Management Safety and Health Committee Training* (see below and Tab 2)

Although these USPS handbooks are not part of the National Agreement, they are useful because they outline the training that management provides to local joint safety committee members. The EL-809-T is the trainer's guide for conducting this training, and the EL-809 is the handout given to trainee members of local joint safety and health committees.

NALC recommends that all local safety and health committee members read and become familiar with these basic materials for local safety and health committees.

Tab 3 ELM Chapter 8, Safety and Health Program

Chapter 8 of the *Employee and Labor Relations Manual (ELM)* describes the Postal Service's safety and health program in detail, and the responsibilities of each level of USPS officials for safety and health. NALC safety and health committee members should read sections 810 through 860.

Section 814 describes employee rights and responsibilities concerning safety and health:

814 Employee Rights and Responsibilities

814.1 Rights

Employees have the right to:

- a. Become actively involved in the Postal Service's Safety and Health Program and to be provided a safe and healthful work environment.
- b. Report unsafe and unhealthful working conditions, using Form 1767, Report of Hazard, Unsafe Condition, or Practice.
- c. Consult with management through appropriate employee representatives on safety and health matters, i.e., program effectiveness and participation in inspection activities where permissible.
- d. Participate in the safety and health program without fear of restraint, interference, coercion, discrimination, or reprisal.

814.2 Responsibilities

It is the responsibility of all employees to:

- a. Comply with all OSHA and postal safety and health regulations, procedures, and practices, including the use of approved personal protective equipment.

- b. Keep the work area in a safe and healthful condition through good housekeeping and proper maintenance of property and equipment.
- c. Immediately report safety hazards and unsafe working conditions.
- d. Perform all duties in a safe manner.
- e. Keep physically and mentally fit to meet the requirements of the job.
- f. Immediately report any accident or injury in which they are involved to their supervisors, regardless of the extent of injury or amount of damages.
- g. Drive defensively and professionally; extend courtesy in all situations; and obey all state, local, and postal regulations when driving a vehicle owned, leased, or contracted for by the Postal Service.

Tab 4 Forms 1767 and 1769

Two essential Postal Service forms are provided behind Tab 4:

Form 1767, Report of Hazard, Unsafe Condition, or Practice. Section 824.6 of the ELM addresses the use of PS Form 1767. The Postal Service should make copies of Form 1767 available to all employees. Any employee may fill out the Form to report a hazard, unsafe condition or practice either at a postal facility or out on the street. The employee should retain a copy when submitting the form to management. Management is required to respond quickly to the report and to move promptly to abate (stop) the unsafe hazard, condition or practice. (See ELM 824.6 under Tab 3.)

Form 1769, Accident Report. Form 1769 serves as the Postal Service's basic reporting form for occupational accidents or illnesses. ELM Section 821 requires an employee's supervisor or manager to "report all accidents and occupational injuries and illnesses on Form 1769 within 24 hours of the date of the accident, the diagnosis of injury or illness, or the notification of the manager or of the situation." In addition, management must provide a copy of the form to the affected employee upon request. *NALC encourages letter carriers to request a copy.*

The information recorded on the Form 1769 is used for OSHA reporting purposes as well as USPS purposes. For instance, ELM Section 821.14 explains that each postal facility must follow OSHA requirements by maintaining a current log and annual summary of occupational injuries and illnesses. For those injuries and illnesses that OSHA requires the Postal Service to record, the information from the Form 1769 is copied onto the OSHA log (known as OSHA Form 300). Review ELM Section 821 (Tab 3) for more information about occupational injury, illness and accident reporting.

Tab 5 Occupational Safety and Health Act (OSHA)

Postal employees and the Postal Service are covered by the OSHA—the Occupational Safety and Health Act of 1970. The OSHA law sets safety regulations and standards covering workplaces. It also directs the Occupational Safety and Health Administration to enforce the law through inspections of workplaces, plus citations and penalties for noncompliance.

Postal employees may file complaints with OSHA to resolve safety and health problems at work. However, NALC and the Postal Service believe that it is best for both parties to attempt to work together on these problems—inside the postal workplace—rather than resorting first to an outside agency.

Tab 5 contains *All About OSHA*, a publication explaining the basics of the OSHA law, OSHA standards, OSHA inspections, requirements for employers and so forth. A list of related OSHA publications appears on page 41, and the following pages list the addresses and phone numbers of OSHA regional and area offices.

Tab 6 More Safety and Health Resources - USPS and the Web

Tab 6 provides a starting point for finding additional information about safety and health. First, there are lists of safety-related USPS handbooks, manuals, publications, instructions and so forth. We have also provided a list of websites where NALC activists can find a wealth of safety and health related information.

NALC safety and health site. It is recommended that NALC safety and health activists pay frequent visits the NALC's own safety and health page on the web, at www.nalc.org.

Tab 1

Article 14 and Supporting JCAM Material



NALC Guide to Safety and Health

ARTICLE 14 SAFETY AND HEALTH

14.1 Section 1. Responsibilities

It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force. The Union will cooperate with and assist management to live up to this responsibility. The Employer will meet with the Union on a semiannual basis and inform the Union of its automated systems development programs. The Employer also agrees to give appropriate consideration to human factors in the design and development of automated systems. Human factors and ergonomics of new automated systems are a proper subject for discussion at the National Joint Labor-Management Safety Committee.

Responsibilities. It is management's responsibility to provide safe working conditions; it is the union's responsibility to cooperate with and assist management in its efforts to fulfill this responsibility.

14.2 Section 2. Cooperation

The Employer and the Union insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions. Mechanization, vehicles and vehicle equipment, and the work place must be maintained in a safe and sanitary condition, including adequate occupational health and environmental conditions. The Employer shall make available at each installation forms to be used by employees in reporting unsafe and unhealthful conditions. If an employee believes he/she is being required to work under unsafe conditions, such employee may:

- (a) notify such employee's supervisor who will immediately investigate the condition and take corrective action if necessary;
- (b) notify such employee's steward, if available, who may discuss the alleged unsafe condition with such employee's supervisor;
- (c) file a grievance at **Formal Step A** of the grievance procedure within fourteen (14) days of notifying such employee's supervisor if no corrective action is taken during the employee's tour; and/or
- (d) make a written report to the Union representative from the local Safety and Health Committee who may discuss the report with such employee's supervisor.

Upon written request of the employee involved in an accident, a copy of the PS Form 1769 (Accident Report) will be provided.

Any grievance which has as its subject a safety or health issue directly affecting an employee(s) which is subsequently properly appealed to arbitration in accordance with the provisions of Article 15 may be placed at the head of the appropriate arbitration docket at the request of the Union.

Priority Handling of Safety Issues. Article 14.2 provides a special priority for the handling of safety and health issues, providing for cooperative correction of unsafe conditions and enforcement of safety rules, and requiring special handling of individual safety issues as they arise.

Safety Grievances Filed at Formal Step A. Article 14.2.(c) provides that safety and health grievances may be filed directly at Formal Step A of the grievance procedure. However, if a health or safety grievance is filed at Informal Step A instead, it is not procedurally defective for that reason.

Priority Arbitration Scheduling. Any grievance which has as its subject a safety or health issue directly affecting an employee(s) which is subsequently properly appealed to arbitration may be placed at the head of the appropriate arbitration docket at the request of the union. The Postal Service will not refuse to schedule a case in accordance with Article 14.2 based solely upon the belief that no safety issue is present. However, placement of a case at the head of the arbitration docket does not preclude the Postal Service from arguing the existence of the alleged “safety” issue or that the case should not have been given priority. Prearbitration Settlement F94N-4F-C-97024971, February 20, 2001, (M-01433).

14.3 Section 3. Implementation

To assist in the positive implementation of the program:

A. There shall be established at the Employer’s Headquarters level, a Joint Labor-Management Safety Committee. Representation on the Committee, to be specifically determined by the Employer and the Union, shall include one person from the Union and representatives from appropriate Departments in the Postal Service. Not later than 60 days following the effective date of this Collective Bargaining Agreement, designated representatives of the Union and Management will meet for the purpose of developing a comprehensive agenda which will include all aspects of the Employer’s Safety Program. Subsequent to the development of this agenda priorities will be established and a tentative schedule will be developed to insure full discussion of all topics. Meetings may also be requested by either party for the specific purpose of discussing additional topics of interest within the scope of the Committee.

The responsibility of the Committee will be to evaluate and make recommendations on all aspects of the Employer’s Safety Program, to include program adequacy, implementation at the local level, and studies being conducted for improving the work environment.

The Chair will be designated by the Employer. The Union may designate a coordinator who, in conjunction with the Chair, shall schedule the meetings, and recommended priorities on new agenda items. In addition, the coordinator may assist the Chair in conducting the activities of the Committee. The Employer shall furnish the Union information relating to injuries, illness and safety, including the morbidity and

mortality experience of employees. This report shall be in form of reports furnished OSHA on a quarterly basis.

The Headquarters level Committee will meet quarterly and the Employer and Union Representatives will exchange proposed agenda items two weeks before the scheduled meetings. If problems or items of significant, national nature arise between scheduled quarterly meetings either party may request a special meeting of the Committee. Either party will have the right to be accompanied to any Committee meeting by no more than two technical advisors.

B. There shall be established at the Employer's Area level, an Area Joint Labor-Management Safety Committee, which will be scheduled to meet quarterly. The Employer and Union Representatives will exchange proposed agenda items two weeks before the scheduled meetings. If problems or items of a significant, area nature arise between scheduled quarterly meetings, either party may request a special meeting of the Committee. Either party will have the right to be accompanied to any Committee meeting by no more than two technical advisors.

Representation on the Committee shall include one person from the Union and appropriate representatives from the Postal Service Area Office. The Chair will be designated by the Employer.

C. The Employer will make Health Service available for the treatment of job related injury or illness where it determines they are needed. The Health Service will be available from any of the following sources: U.S. Public Health Service; other government or public medical sources within the area; independent or private medical facilities or services that can be contracted for; or in the event funds, spaces and personnel are available for such purposes, they may be staffed at the installation. The Employer will promulgate appropriate regulations which comply with applicable regulations of the Office of Workers' Compensation Programs, including employee choice of health services.

D. The Employer will comply with Section 19 of the Williams-Steiger Occupational Safety and Health Act.

OSHA. The Postal Employees' Safety Enhancement Act of 1998 (PESEA) changed the status of the Postal Service as an employer under the Occupational Safety and Health Act (OSHA). Previously, the Postal Service, as a federal agency, was exempt from the private-sector provisions of the OSHA and was covered only by Section 19 of the Act and Executive Order 12196. When PESEA became effective, the Postal Service, unlike other federal agencies, became fully subject to the OSHA. This means that OSHA has jurisdiction over the Postal Service in matters relating to employee safety and health.

14.4 Section 4. Local Safety Committee

At each postal installation having 50 or more employees, a Joint Labor-Management Safety and Health Committee will be established. In installations having fewer than 50 employees, installation heads are encouraged to establish similar committees when requested by the Union. Where no Safety and Health Committee exists, safety and

health items may be placed on the agenda and discussed at labor-management meetings. There shall be equal representation on the Committee between the Union and management. The representation on the Committee to be specifically determined by the Employer and the Union shall include one person from the Union and appropriate management representatives. The Chair will be designated by the Employer.

It is recognized that under some circumstances, the presence of an additional employee employed at the installation will be useful to the local Safety and Health Committee because of that employee's special expertise or experience with the agenda item being discussed. Under these circumstances, which will not normally be applicable to most agenda items, the employee may, at the request of the Union, be in attendance only for the time necessary to discuss that item. Payment for the actual time spent at such meetings by the employee will be at the applicable straight-time rate, providing the time spent is a part of the employee's regular workday.

Local Committees. Article 14.4 requires creation of local, joint safety committees at each installation with fifty or more employees, and encourages creation of committees at smaller facilities when requested by the union. In small facilities without committees, safety and health issues may be discussed in Labor-Management meetings.

14.5 Section 5. Subjects for Discussion

Individual grievances shall not be made the subject of discussion during Safety and Health Committee meetings.

14.6 Section 6. Employee Participation

It is the intent of this program to insure broad exposure to employees, to develop interest by active participation of employees, to insure new ideas being presented to the Committee and to make certain that employees in all areas of an installation have an opportunity to be represented. At the same time, it is recognized that for the program to be effective, it is desirable to provide for a continuity in the committee work from year to year. Therefore, except for the Chair and Secretary, the Committee members shall serve three-year terms and shall at the discretion of the Union be eligible to succeed themselves.

Employee Participation. Article 14.6 allows, at the union's discretion, all union members of the Safety and Health Committee to succeed themselves at the conclusion of each three-year term.

14.7 Section 7. Local Committee Meetings

The Safety and Health Committee shall meet at least quarterly and at such other times as requested by a Committee member and approved by the Chair in order to discuss significant problems or items. The meeting shall be on official time. Each Committee member shall submit agenda items to the Secretary at least three (3) days prior to the meeting. A member of the Health Unit will be invited to participate in

the meeting of the Labor-Management Safety and Health Committee when agenda item(s) relate to the activities of the Health Unit.

The local Safety and Health Committee must meet at least quarterly, but may meet more often if it wishes, on official (paid) time.

The language which provides that local Safety and Health Committee meetings “shall be on official time” pertains only to members of the carrier craft. If a local branch has appointed a member of another craft to be its representative, that person is compensated only if the meeting is held during the representative’s regular schedule. (National Arbitrator Bernstein, H1N-3D-C 40171, April 8, 1987, C-06949)

14.8.A Section 8. Local Committee Responsibilities

A. The Committee shall review the progress in accident prevention and health at the installation; determine program areas which should have increased emphasis; and it may investigate major accidents which result in disabling injuries. Items properly relating to employee safety and health shall be considered appropriate discussion items. Upon a timely request, information or records necessary for the local Safety and Health Committee to investigate real or potential safety and health issues will be made available to the Committee.

In addition, the Committee shall promote the cause of safety and health in the installation by:

1. Reviewing safety and health suggestions, safety training records and reports of unsafe conditions or practices.
2. Reviewing local safety and health rules.
3. Identifying employee unsafe work practices and assisting in enforcing safety work rules.
4. Reviewing updated list of hazardous materials used in the installation.
5. Reviewing local dog bite prevention efforts.

The Committee shall at its discretion render reports to the installation head and may at its discretion make recommendations to the installation head for action on matters concerning safety and health. The installation head shall within a reasonable period of time advise the Committee that the recommended action has been taken or advise the Headquarters Safety and Health Committee and the President of the local Union as to why it has not. Any member of the Committee may also submit a written report to the Headquarters Safety and Health Committee in the event the Committee’s recommendations are not implemented.

Upon proper written request to the Chair of the Committee, on-the-spot inspection of particular troublesome areas may be made by individual Committee members or a Subcommittee or the Committee as a whole. Such request shall not be unreasonably denied. When so approved, the Committee members shall be on official time while making such inspection.

The Union representative from the local Safety and Health Committee may participate on the annual inspection, conducted by district safety and health services personnel in accordance with ELM Section 824, provided that the Union represents employees at the facility being inspected. In no case shall there be more than one NALC representative on such inspections.

14.8.A

The Union representative from the local Safety and Health Committee may participate on other inspections of the main facility of each post office or other installation with 100 or more workyears of employment in the regular work force, and of an individual station or branch where the station or branch has 100 or more workyears of employment in the regular work force, provided that the Union represents employees at the main facility or station or branch and provided that the Union representative is domiciled at the main facility or station or branch to be inspected. If the Union representative to the local Safety and Health Committee is not domiciled at the main facility or station or branch to be inspected and if the Union represents employees at the main facility or station or branch, at the Union's option, representatives from the Committee may participate on the inspection (at no additional cost for the Employer) or the Union may designate representatives domiciled at the main facility or station or branch to be inspected to participate on the inspection. In no case shall there be more than one NALC representative on such inspections.

The Union representative from the local Safety and Health Committee may participate on the annual inspection of each installation with less than 100 workyears of employment in the regular work force, where such Committee exists in the installation being inspected. In those installations that do not have a Safety and Health Committee, the inspector shall afford the opportunity for a bargaining unit employee from the Union, if it represents employees in that installation, to accompany him/her during these inspections. If requested, these bargaining unit employees should be selected by the various exclusive bargaining representatives in that installation. In no case shall there be more than one NALC representative on such inspections.

14.8.B

B. An appointed member of a local committee will receive an orientation by the Employer which will include:

1. Responsibilities of the Committee and its members.
2. Basic elements of the Safety and Health Program.
3. Identification of hazards and unsafe practices.
4. Explanation of reports and statistics reviewed and analyzed by the Committee.

14.8.C

C. Where an investigation board is appointed by a Vice President, Area Operations or a District Manager to investigate a fatal or serious industrial non-criminal accident and/or injury, the appropriate Union at the installation will be advised promptly. When requested by the Union, a representative from the local Safety and Health Committee will be permitted to accompany the board in its investigation.

14.8.D

D. In installations where employees represented by the Union accept, handle and/or transport hazardous materials, the Employer will establish a program of promoting safety awareness through communi-

cations and/or training, as appropriate. Elements of such a program would include, but not be limited to:

1. Informational postings, pamphlets or articles in Postal Area Bulletins.
2. Distribution of Publication 52 to employees whose duties require acceptance of and handling hazardous or perishable items.
3. On-the-job training of employees whose duties require the handling and/or transportation of hazardous or perishable items. This training will include, but is not limited to, hazard identification; proper handling of hazardous materials; personal protective equipment availability and its use; cleanup and disposal requirements for hazardous materials.
- 14.8.D.4 4. All mailbags containing any hazardous materials, as defined in Publication 52, will be appropriately identified so that the employee handling the mail is aware that the mailbag contains one or more hazardous material packages.
5. Personal protective equipment will be made available to employees who are exposed to spills and breakage of hazardous materials.

Local Safety and Health Committees have review responsibilities over accident prevention and health issues such as the review of safety and health suggestions, safety-related records and rules, dog bite prevention efforts, and the list of hazardous materials.

On-the-spot inspection of particular troublesome areas may be made by individual Committee members, a subcommittee or the Committee as a whole upon proper written request to the Chair of the Committee. Such request shall not be unreasonably denied. When so approved, the Committee members shall be on official time while making such inspection.

A union representative from the local Safety and Health Committee may participate on the annual inspection, conducted by district safety and health services personnel in accordance with ELM Section 824, provided that the union represents employees at the facility being inspected. In no case shall there be more than one NALC representative on such inspections.

14.9 **Section 9. Field Federal Safety and Health Councils**

In those cities where Field Federal Safety and Health Councils exist, one representative of the Union who is on the Local Safety and Health Committee in an independent postal installation in that city and who serves as a member of such Councils, will be permitted to attend the meetings. Such employee will be excused from regularly assigned duties without loss of pay. Employer authorized payment as outlined above will be granted at the applicable straight time rate, provided the time spent in such meetings is a part of the employee's regular work day.

(The preceding Article, Article 14, shall apply to Transitional Employees.)

**MEMORANDUM OF UNDERSTANDING
BETWEEN THE
UNITED STATES POSTAL SERVICE AND
NATIONAL ASSOCIATION OF LETTER CARRIERS,
AFL-CIO**

Re: Joint Safety and Accident Control Teams

The United States Postal Service and the National Association of Letter Carriers agree that it is in the best interest of both parties to have an effective health and safety program. Therefore, it is hereby agreed that representatives of the parties will meet at the national level for the purpose of developing an agenda to ensure the effectiveness of the Headquarters Joint Labor-Management Safety Committee.

The Committee may establish Joint Safety and Accident Control Teams whose aim is to reduce accidents and injuries and promote improved safety performance. The Joint Safety and Accident Control Teams will consider establishing where appropriate, local accident prevention guidelines and procedures for

- 1) reporting and abating hazardous conditions and practices,
- 2) expediting resolution of local safety and health issues, and
- 3) promoting safety awareness and investigating safety and health complaints.

The Joint Safety and Accident Control Teams will develop periodic progress reports to the Headquarters Joint Labor-Management Safety Committee and will make recommendations regarding the program structure where necessary. The Headquarters Joint Labor-Management Safety Committee will monitor the efforts of the local programs with the aim of expanding the Joint Safety and Accident Control Teams if the program is deemed successful by the parties.

It is further understood that nothing in this Memorandum of Understanding is intended to infringe on management or union rights as found in the National Agreement.

Tab 2

USPS Joint Safety and Health Committee Training



NALC Guide to Safety and Health



GUIDELINES FOR AREA/LOCAL
**Joint Labor-Management
Safety and Health Committees**

Handbook EL-809
April 2001



Guidelines for Area/Local Joint Labor-Management Safety and Health Committees

Handbook EL-809

April 2001
Transmittal Letter

A. Explanation. This issue of Handbook EL-809 obsoletes all previously published versions.

B. Distribution

1. **Initial.** Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.
2. **Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *Material Distribution Center Supply Requisition*.

C. Comments

1. Comments and questions about the content of this document can be submitted in writing to:

SAFETY PERFORMANCE MANAGEMENT
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM 9801
WASHINGTON DC 20260-4231

2. Comments and questions about the organization or editing of this document can be submitted in writing to:

POLICIES AND PROCEDURES INFORMATION
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM 5540
WASHINGTON DC 20260-5540

D. Effective Date. This handbook is effective upon receipt.

A handwritten signature in black ink, appearing to read "Suzanne F. Medvidovich".

Suzanne F. Medvidovich
Senior Vice President
Human Resources

Introduction

This booklet is for all area/local joint labor-management safety and health committee members and is intended to provide guidance and information on your responsibilities as a committee member.

As an individual serving on the safety and health committee, you must have a personal commitment to make accident prevention a part of your daily work. You can demonstrate your commitment through leadership and by setting a personal example by working safely and observing safe practices. Safety must become your way of life, both on and off the job. Safety never just happens. If a workplace is safe, it is because somebody is working to make it safe. As a member of the safety and health committee, you are playing a major role in making your workplace safe for all employees.

This page intentionally left blank

Contents

I. Safety Philosophy of the United States Postal Service	1
II. Membership	1
III. Terms of Membership	3
IV. Orientation of Area/Local Committee Members	3
V. Duties and Responsibilities of Committee Members	3
A. All Local Safety and Health Committee Members	3
B. All Area Safety and Health Committee Members	5
C. Area/Local Committee Officers	5
D. Field Federal Safety and Health Councils	6
VI. Area/Local Committee Meetings	6
VII. Order of Business	7
VIII. Suggested Format for Minutes of Meeting	9

This page intentionally left blank

I. Safety Philosophy of the United States Postal Service

This is the safety philosophy of the Postal Service:

- All injuries can be prevented.
- Management, which includes all levels through the initial level supervisor, has the responsibility for preventing injuries.
- It is possible to safeguard against all operating exposures that may result in injuries.
- All employees must be trained to work safely and to understand that it is to their advantage, as well as the Postal Service's, to work safely, and that they have a definite responsibility to do so in order to avoid the pain and suffering caused by accidents.
- It is good business from the standpoint of both efficiency and economy to prevent personal injuries on the job and off the job.

The following are excerpts from the 1998 National Agreement Article on Safety and Health:

It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force. The Unions will cooperate with and assist management to live up to this responsibility.

The Employer and the Unions insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions.

II. Membership

Area Safety Committee

A joint labor-management safety and health committee will be established at the employer's area level.

- Representation on the committee shall include one person from the union and appropriate representatives from the Postal Service area office.

- The chairperson of the committee will be an operations direct report to the vice president, Area Operations, designated by management.
- The secretary of the committee will be designated by management.
- When an area has safety, maintenance, and/or environmental personnel (analyst, manager, specialist, or coordinator) on the staff, those persons shall be members of the committee.

Local Safety Committee

- A. A joint labor-management safety and health committee will be established at each postal installation that has 50 or more employees.
- B. Such a committee may be established upon the request of the installation head at installations having fewer than 50 employees.
- C. There shall be equal representation on the committee between the unions and management.
 - Representation on the committee shall include one person from each of the unions at the installation. Appropriate officials shall represent management.
 - The chairperson of the committee will be an operations direct report to the installation head designated by management.
 - The secretary of the committee will be designated by management.
 - When an installation has a safety officer (manager, specialist, technician) on the staff, that person shall be a member of the committee.
 - When an installation has maintenance and/or environmental personnel (manager, supervisor, coordinator) on the staff, those persons shall be members of the committee.

III. Terms of Membership

With the exception of the chairperson, the secretary, and the safety officer, committee members shall serve three-year terms. Union representatives will, at the discretion of their unions, be eligible to succeed themselves.

IV. Orientation of Area/Local Committee Members

All committee members will receive formal orientation and training on the duties and responsibilities of committee members, on the basic elements of the safety and health programs, on identification of hazards and unsafe conditions, and on reports and statistics reviewed and analyzed by the committee.

V. Duties and Responsibilities of Committee Members

- A. All Local Safety and Health Committee Members:
1. Attend all scheduled meetings.
 2. Create and maintain an interest in safety and health and thereby help to prevent accidents.
 3. Review local safety and health rules and assist management with the enforcement of these rules.
 4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent.
 5. Determine program areas to receive increased emphasis and make recommendations regarding them.
 6. Review employee safety and health suggestions.
 7. Review safety-training records to determine if all employees are receiving appropriate training.

8. Review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*, and responses or corrective action taken.
9. Review Forms 1769, *Accident Report*, and statistics from the National Accident Reporting System and the injury compensation program reporting system.
10. Discuss all matters relating to employee safety and health, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
11. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections.
 - When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation.
 - Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility.
 - A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility.
 - One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce,

where such a committee exists in the installation being inspected.

B. All Area Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety and health and thereby help to prevent accidents.
3. Determine program areas to receive increased emphasis and make recommendations regarding them.
4. Review Forms 1769, *Accident Report*, and statistics from the National Accident Reporting System and the injury compensation program reporting system.
5. Discuss all matters relating to employee safety and health, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.

C. Area/Local Committee Officers:

1. Chairperson:
 - Arranges for meeting place.
 - Sets times and dates for meetings.
 - Notifies members of meetings.
 - Receives agenda items from members.
 - Arranges agenda and program.
 - Arranges for seating for all members.
 - Reviews previous minutes and other materials before meetings.
 - Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee.
 - Responds to members' requests for special meetings.

2. Area/Local Secretary:

- Prepares minutes of meetings.
- Distributes minutes.
- Reports on the status of recommendations made by the committee.
- Distributes agenda to members.
- May assume some of the chairperson's duties.

D. Field Federal Safety and Health Councils:

In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay.

VI. Area/Local Committee Meetings

- A. The committee shall meet at least quarterly. In addition, meetings may be held at any other time at the request of a committee member to discuss important problems or items. Such a request must be approved by the chairperson, but the request cannot be unreasonably denied.
- B. Agenda items must be submitted to the committee's chairperson at least three days before a meeting.
- C. Individual grievances will not be discussed during local committee meetings unless provided for in the national agreements.
- D. Meetings should be conducted according to the generally accepted rules of order, but formality should not be allowed to overwhelm the meeting or to inhibit free discussion.

VII. Order of Business

Local Committee

- A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.
- B. *Roll call by the secretary.* Names of members and others present should be recorded.
- C. *Introduction of any visitors.*
- D. *Minutes of the previous meeting.* These should be read and any needed corrections made.
- E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.
- F. *New business.*
 - Review of safety accident reports, statistics, and accident reports.
 - Review of Form 1767, *Report of Hazard, Unsafe Condition, or Practice.*
 - Review of employee safety suggestions.
 - Review of safety rules, safety films, and safety training programs, etc.
 - Review of progress of safety and health program, and special campaigns, etc.
 - Discussion and resolution of any other items or problems relating to safety and health.
- G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.
- H. *Adjournment.*

Area Committee

- A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.
- B. *Roll call by the secretary.* Names of members and others present should be recorded.
- C. *Introduction of any visitors.*
- D. *Minutes of the previous meeting.* These should be read and any needed corrections made.
- E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.
- F. *New business.*
 - Review of safety accident reports, statistics, accident reports.
 - Review of safety rules, safety films, safety training programs, etc.
 - Review of progress of safety and health program, special campaigns, etc.
 - Discussion and resolution of any other items or problems relating to safety and health.
- G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.
- H. *Adjournment.*

VIII. Suggested Format for Minutes of Meeting

Date: _____

Subject: Safety and Health Committee [Date of Report] Minutes of Meeting

From: Chairperson, Safety and Health Committee (office, state, and ZIP Code)

To: Postmaster (or installation head) (office, state, and ZIP Code)

Meeting convened at:	(time)	(location)
In attendance:	(name)	Chairperson
	(name)	Secretary
	(name)	Title
	(name)	Title
Not in attendance:	(name)	Title
	(name)	Title
Agenda Items:	Unfinished business:	(Subject, action taken, etc.)
	New business:	(Subject, action taken, etc.)
	Problem areas which should receive increased emphasis:	(Brief report and recommendations, if any)
	Special items:	(This will include safety education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)
	Brief report, if any	
Meeting adjourned at:	(time)	

Signed: _____ **Chairperson**

_____ **Secretary**

Note: Copies of the minutes should be provided to the local president of each union and posted on employee bulletin boards.

This page intentionally left blank



AREA/LOCAL
**Joint Labor-Management
Safety and Health Committees**

Facilitator's Guide, Course 19201-31

Handbook EL-809-T
April 2001

Use of Training Materials

These training course materials are intended for training purposes only. They have been prepared to conform with existing Postal Service policies and standards and do not represent new regulations or policies.

Copyright © 2001 by the United States Postal Service
Washington DC 20260-4215

All rights reserved.

No part of this publication may be reproduced in any form or by any means without permission, in writing, from Employee Resource Management.

Certain parts of this publication may contain copyrighted materials from other sources the reproduction of which for this specific training use has been interpreted not to exceed the fair use clause of the copyright regulation (16 C.F.R. 371.5 ASM).



Area/Local Joint Labor-Management Safety and Health Committee Training

Handbook EL-809-T

April 2001
Transmittal Letter

- A. Explanation.** This issue of Handbook EL-809-T obsoletes all previously published versions.
- B. Distribution.**
- 1. Initial.** Handbook EL-809-T is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.
 - 2. Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *Material Distribution Center Supply Requisition*.
- C. Comments.**
1. Comments and questions about the content of this document can be submitted in writing to:
SAFETY PERFORMANCE MANAGEMENT
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM 9801
WASHINGTON DC 20260-4231
 2. Comments and questions about the organization or editing of this document can be submitted in writing to:
POLICIES AND PROCEDURES INFORMATION
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM 9801
WASHINGTON DC 20260-5540
- D. Effective Date.** This handbook is effective upon receipt.

A handwritten signature in black ink, appearing to read "Suzanne F. Medvidovich".

Suzanne F. Medvidovich
Senior Vice President
Human Resources

A Commitment to Diversity

The Postal Service is committed to fostering and achieving a work and learning environment that respects and values a diverse workforce. Valuing and managing diversity in the Postal Service means that we will build an inclusive environment that respects the uniqueness of every individual and encourages the contributions, experiences, and perspectives of all people.

It is essential that our work and learning environments be free from discrimination and harassment on any basis.

In our classrooms, on the workroom floor, in casual conversation, and in formal meetings, employees and faculty are asked to encourage an open learning environment that is supportive to everyone.

Course materials, lectures, classroom debates, and casual conversation should always reflect the commitment to safety and freedom from discrimination, sexual harassment, and harassment on any prohibited basis.

EAS training staff has a professional obligation to provide a safe, discrimination-free, and sexual harassment-free learning environment. Instructors are expected to support this commitment. Class participants are asked to support the goal of zero tolerance of behavior that violates these commitments.

If you find course material that is presented in the classroom or in self-instructional format that does not follow these guidelines, please let an instructor know immediately.

If classroom discussions do not support these principles, please point that out to the instructor as well.

Diversity is a source of strength for our organization. Diversity promotes innovation, creativity, productivity, and growth, and enables a broadening of existing concepts.

The Postal Service's policy is to value the diversity of our employees, customers, and suppliers, to do what is right for our employees and the communities we serve, thereby ensuring a competitive advantage in the global marketplace.

This page intentionally left blank

Contents

Guidelines for Course Administration	1
Introduction	1
Course Objectives	2
Time Allocated for Course	2
Instructional Methods	2
Participant Materials	2
Media	3
Additional Courses	3
Module 1: Introduction	5
Welcome	6
Introduction of Facilitator	6
Participant Roster	6
Introduction of Participants	6
Course Schedule and Logistics	6
Module 2: Safety & Health Committee Functions	9
Levels of Safety and Health Committees	10
Why Safety and Health Committees	10
Membership	12
Duties and Responsibilities	12
Review of Safety Records and Reports	19
Module 3: Creating an Interest in Safety	23
Safety as a Value	24
Fine-Tuning Safety Programs	24
Encouraging Employee Participation	25
Promoting Safety	25
Module 4: Enforcement of Safety Rules	27
Committee Responsibility	28
Employee Responsibility	28
Why Employees Don't Always Follow the Rules	29
How to Help Enforce Safety Programs	30

Module 5: Committee Teamwork	33
Group Synergy	34
The Power of Diversity	34
Conclusion	35
Appendices	37
Appendix 1 — Participant Roster	39
Appendix 2 — Postal Manuals, Handbooks, and Publications	41
Appendix 3 — Non-Postal Manuals, Handbooks, and Publications	43
Appendix 4 — Forms Used by the Postal Service	45

Guidelines for Course Administration

Introduction

This guide will assist you in providing training for members of Joint Labor-Management Safety and Health Committees (JLMSHC). This training is required for all committee members at the local and area levels.

You have the freedom to tailor your presentation to fit local needs and facility-specific safety program plans. This guide provides you with teaching suggestions and an outline of information that should be covered. The main reference for this course is Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*.

You should supplement the training by providing local reports and discussing safety and health problems that warrant the committee's attention. Also, using case studies and simulations of real work situations will enhance the committee's effectiveness.

When conducting group exercises, be sure to include both labor and management representatives in each working group. Cooperation between committee members should be encouraged throughout the training.

Class size will vary. Classes should be large enough to permit role playing, case studies, and brainstorming activities, but small enough that everyone has a chance to participate within the allotted time. This course is designed to take 4 hours.

The course instructor is responsible for completing the required training report forms. These should be filed using Form 2548, *Individual Training Record — Supplemental Sheet*, or the equivalent, such as a roster. This information should be recorded on the National Training Database (NTD) in accordance with local and national guidelines.

Course Objectives

At the completion of the course, the participants will be able to:

- Define the roles and responsibilities of Joint Labor-Management Safety and Health Committees (JLMSHC).
- Create and maintain an interest in safety.
- Review and assist management in the enforcement of safety rules and program plans.
- Promote committee teamwork.

Time Allocated for Course

- 4 hours.

Instructional Methods

- Lecture.
- Case studies.
- Discussions.
- Group exercises.

Participant Materials

- Name tents.
- Paper and pencils.
- Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees* (one per participant).
- Local examples of safety reports (Form 1767, *Report of Hazard, Unsafe Condition, or Practice*; Form 1769, *Accident Report*; *OSHA 200 Log*; statistical reports, etc.).
- Copies of case studies and other exercises.
- Examples of inspection checklists that are in the Safety Toolkit.

Media

- Flip charts with stands (one per group plus one for the facilitator).
- Marking pens.
- LCD or overhead projector.

Additional Courses

There are other courses available to committee members that will help them carry out their duties more effectively. Examples include:

- Collateral Duty Safety and Health Training (course # 21591-00).
- Safety for Postal Leadership (course # 19501-02).

This page intentionally left blank

Module 1: Introduction

Objectives:

Participants will be able to:

- State the course objectives.
- Locate emergency evacuation routes, restrooms, and smoking areas, and deal with other matters relating to course logistics.
- Get to know each other.

Time Allocated for Module:

- 1/2 hour.

Instructional Methods:

- Lecture with discussion.

Summary:

- Welcome by operations manager and state course objectives.
- Complete a class roster.
- Introduce participants.
- Course logistics.

Participant Material Used:

- None.

Media Required:

- None.

Notes for Facilitator:

- It is important for a senior operations manager or his or her representative to welcome the committee as a demonstration of their commitment to safety and the value of the Joint Labor-Management Safety and Health Committee.

For Further Information:

- Emergency Evacuation Plan for the facility where training is taking place.

Welcome

- Welcome by the plant manager/postmaster/installation head.
- Statement of manager's vision for the Joint Labor-Management Safety and Health Committee.

Introduction of Facilitator

- Introduce the trainer and other resource persons involved.

Participant Roster

- Complete a roster of participants (see Appendix 1).
- Include participant's Social Security number and finance number.
- Forward roster to the PEDC for entry in the NTD.

Introduction of Participants

- Have each participant make a name tent.
- Use a creative method to allow each participant to introduce himself or herself. This should be used as an ice-breaker and set the tone for the training.
- Encourage group interaction during activities suggested throughout the course.

Course Schedule and Logistics

- Course schedule and times (see a suggested sample schedule on next page).
- Restroom location in the facility.
- Smoking policy for the facility.
- Emergency evacuation route (show a diagram).

Joint Labor-Management Safety and Health Training

Suggested Time / Topic Outline

Schedule	Duration	Content	Process	Details / Notes
8:00 AM	1/2 hour	Introduction/Administrative Issues <ul style="list-style-type: none"> ■ Introductions ■ Local safety policies and philosophy ■ The training facility 	Lecture Discussion	Introduce course sponsor, facilitators, and participants. Identify safety and health issues and logistical arrangements.
8:30 AM	1-1/2 hrs.	Safety and Health Committee Functions <ul style="list-style-type: none"> ■ Levels of committees ■ Why have committees ■ Membership, duties, and responsibilities ■ Meeting protocol and suggested minutes ■ Review of safety records and reports ■ Participation in inspections 	Exercise Discussion Demonstration Q&A	This discussion should be based on local practices as well as the national guidelines suggested in Handbook EL-809.
10:00 AM	15 min.	Break		Time is approximate.
10:15 AM	1/2 hour	Creating an Interest in Safety <ul style="list-style-type: none"> ■ Safety as a value ■ Fine-tuning safety programs ■ Encouraging employee suggestions ■ Communicating safety messages 	Lecture Discussion	It is important for management representatives to demonstrate a commitment to safety.
10:45 AM	1 hour	Reviewing and Assisting with Safety Programs Enforcement <ul style="list-style-type: none"> ■ Defining responsibilities for enforcement assistance ■ Why employees don't always follow the rules ■ Actions that can assist enforcement of rules and regulations 	Lecture Exercises	Focus on the importance of implementing safety programs as well as individual rules and regulations.
11:15 AM	1/2 hour	Committee Teamwork <ul style="list-style-type: none"> ■ Group synergy ■ The power of diversity 	Lecture Exercise	Create an up-beat and collaborative spirit among committee members.

This page intentionally left blank

Module 2: Safety & Health Committee Functions

Objective:

Participants will be able to:

- Identify the reason and purpose for the existence of Safety and Health Committees.

Time Allocated for Module:

- 1-1/2 hours.

Instructional Methods:

- Lecture and discussion.

Summary:

- Levels of safety and health committees.
- Why a Joint Labor-Management Safety and Health Committee.
- Membership and responsibilities of committee members.
- Proposed order of business for committee meetings.
- Proposed format for recording minutes of meetings.
- Review of safety records and reports.

Participant Material Used:

- Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*.

Media Required:

- Flip chart.
- Copies of local Forms 1767 and 1769 that have been submitted.

Notes for Facilitator:

- This module uses exercises that require you to supply copies of local Forms 1767 and 1769 and safety statistics for the facility. Be sure to have these available before the module begins.

For Further Information:

- *Employee and Labor Relations Manual (ELM)*, Chapter 8.
- National Agreements — Article XIV.

Levels of Safety and Health Committees

Executive or Management Safety and Health Committees

Executive Safety and Health Committees are established at the headquarters and area levels. Management Safety and Health Committees exist at local levels. Specific duties, responsibilities, and membership requirements of these committees are specified in Memorandums of Policy, Management Instructions, and other postal publications.

Joint Labor-Management Safety and Health Committees

Joint Labor-Management Safety and Health Committees are established at multiple levels in accordance with national agreements. Local Joint Labor-Management Safety and Health Committees are mandatory in installations having 50 or more employees. Installations that have fewer than 50 employees are encouraged to establish committees, but they are not mandated to do so.

Why Safety and Health Committees

This exercise is to get the participants thinking about their role as committee members. Save the outputs as a review at the end of the module.

Exercise: Why a Committee

Purpose:

- Define the purpose of Joint Labor-Management Safety and Health Committees. (Choose either an area or local committee for illustrative purposes.)

Process:

- Provide a flip chart to each group.
- Have each group brainstorm and record, on the flip chart, why they think the JLMSHC exists. Allow approximately five minutes for the brainstorming session.

- Consolidate the results from each group onto one list that will be displayed for review at the end of the module.

Output:

- Participants understand the rationale for Joint Labor-Management Safety and Health Committees.

Examples of responses from the above exercise may include:

- To discuss safety policies and procedures.
- To provide for communication between management and employees on matters concerning safety and health.
- To create and maintain an interest in safety.
- To discover unsafe conditions and practices and determine how to eliminate them.
- To ensure a safe and healthful workplace for all employees.

You are members of a Local Joint Labor-Management Safety and Health Committee. There are many reasons why this committee exists. The main reason is to provide and maintain an open channel of communication between employees, unions, and management concerning safety and health matters. The committee also helps ensure that all employees in all areas of the facility have an opportunity to be represented.

Joint committees have considerable potential for reducing accidents, injuries, and illnesses. Committees allow management, unions, and employees to become actively involved in making positive contributions to the safety and health program. Meetings are where changes in programs, regulations, processes, and possible hazards can be discussed freely and openly.

The Joint Labor-Management Safety and Health Committee should stress cooperation between labor and management and advocate safety and health programs as a shared responsibility. This is echoed in National Agreements:

It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force. The Union will cooperate with and assist management to live up to this responsibility.

Membership

There shall be equal representation on the committee between the participating unions and management. Representation on the committee, to be specifically determined by management and the unions, shall include one member from each of the participating unions (except in installations with two or more American Postal Workers Union (APWU) crafts where up to two representatives can be designated by the Union) and appropriate management representatives.

The employer will designate the chairperson. Except for the chairperson and secretary, members will serve 3-year terms. Members are eligible to succeed themselves at the discretion of the unions.

Duties and Responsibilities

Chairperson

The duties of the chairperson are to:

- Arrange for the meeting place.
- Set times and dates for the meeting.
- Notify members of the meeting.
- Receive agenda items from the members.
- Arrange agenda and program.
- Review previous minutes and other materials before the meeting.
- Coordinate the gathering of all appropriate management reports, data, and information to be reviewed by the committee.
- Respond to members' request for special meetings.

Secretary

The duties of the secretary are to:

- Prepare the meeting minutes.
- Distribute minutes.
- Report on the status of recommendations made by the committee.

- Distribute the agenda to members.
- Assume the chairperson's duties as necessary.

Local Committee Members

The duties of committee members are spelled out in several different documents. These are described using the following legend to reference the source documents:

E = Handbook EL-809.

A = APWU National Agreement.

M = NPMHU National Agreement.

N = NALC National Agreement.

Duties of committee members are to:

- Attend all meetings. **(E)**
- Create an interest in safety and health. **(E)**
- Review local safety and health rules and assist management with enforcement of the rules. **(E, A, M, N)**
- Review the progress in accident prevention and health at the installation. **(E, A, M, N)**
- Determine program areas which should have increased emphasis. **(E, A, M, N)**
- Participate in investigation of accidents that result in disabling injuries. **(A, M, N)**
- Review safety and health suggestions. **(E, A, M, N)**
- Review safety training records. **(E, A, M, N)**
- Review Form 1767, *Report of Hazard, Unsafe Condition, or Practice*. **(E, A, M, N)**
- Review Form 1769, *Accident Report*, statistics from the National Accident Reporting System, and the injury compensation program reporting system. **(E)**
- Identify unsafe work practices. **(A, M, N)**

- Review updated list of hazardous materials used in the installation. **(A, M, N)**
- Render reports to the installation head. **(A, M, N)**
- Discuss all matters relating to employee safety and health, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. **(E, A, M, N)**
- Review local dog bite prevention efforts (if applicable). **(N)**
- Ensure adequate safety precautions, identify areas in which it is appropriate to require the presence of an additional person while maintenance work assignments are performed in hazardous areas to ensure adequate safety precautions. The committee uses Form 1783, *On-the-Job Safety Review/Analysis*, to justify the additional person. **(A)**
- Perform on-the-spot inspections of particular troublesome areas upon proper written request to the Chairperson of the Committee. **(E, A, M, N)**
- Identify when it is appropriate to participate in inspections such as:
 - When an investigation board is appointed by a Performance Cluster Manager to investigate a fatal or serious industrial non-criminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation. **(E, A, M, N)**
 - Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and Bulk Mail Center (BMC), provided their union represents employees at that facility. Up to 2 APWU committee representatives may participate in such inspections in 200 man-year facilities. **(E, A)**

- A union representative from the committee may participate in the inspection of any main facility, post office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular work force provided that the union represents employees at that facility and that his or her duty station is at that facility. **(E, A, M, N)**
- One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular work force, where such a committee exists in the installation being inspected. **(E, A, M, N)**

Area Committee Members

The duties of the Area Committee Members are to:

- Attend all meetings. **(E)**
- Create and maintain an interest in safety and health and thereby help to prevent accidents. **(E)**
- Determine program areas to receive increased emphasis and make recommendations regarding them. **(E)**
- Review Forms 1769, *Accident Report*, statistics from the National Accident Reporting System, and the injury compensation program reporting system. **(E)**
- Discuss all matters relating to employee safety and health, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. **(E)**

Area/Local Committee Meetings

Meetings of the Area/Local committee are to be held at least quarterly. Meetings can also be held at the request of a committee member to discuss important problems or items. Although the request requires the approval of the chairperson, no reasonable request should be denied. Members must submit agenda items at least 3 days prior to the meeting.

Meetings should be conducted according to the generally accepted rules of order, but formality should not be allowed to overwhelm the meeting or to inhibit free discussion.

Individual grievances shall not be made the subject of discussion during Local Joint Labor/Management Safety and Health Committee meetings unless permitted by national agreement with the Union.

Order of Business — Local Committee

- Call to order by chairperson.
- Roll call by secretary.
- Introduction of visitors (if present).
- Minutes of previous meeting are read and corrected as necessary by Secretary.
- Unfinished business is brought up for consideration and resolution.
- New Business:
 - Review of safety accident reports and statistics.
 - Review of 1767s.
 - Review of employee suggestions regarding safety and health.
 - Review of safety rules, safety videos, safety training programs, etc.
 - Review of progress of safety and health program, special campaigns, etc.
 - Discussion and resolution of items or problems relating to safety and health.
- Safety education (such as a guest speaker or safety talk).
- Adjournment.

Order of Business — Area Committee

- Call to order by chairperson.
- Roll call by secretary.
- Introduction of visitors (if present).
- Minutes of previous meeting are read and corrected as necessary by secretary.
- Unfinished business is brought up for consideration and resolution.
- New business:
 - Review of safety accident reports and statistics.
 - Review of safety rules, safety videos, safety training programs, etc.
 - Review of progress of safety and health programs, special campaigns, etc.
 - Discussion and resolution of items or problems relating to safety and health.
- Safety education.
- Adjournment.

Minutes of the Meeting

The suggested format for the minutes of the meeting are attached on the next page (see Handbook EL-809). This may be adjusted in accordance with local needs.

Suggested Format:

Minutes of Joint Labor-Management Safety and Health Committee Meetings

Date: _____

Subject: Safety and Health Committee [Date of Report] Minutes of Meeting

From: Chairperson, Safety and Health Committee (office, state, and ZIP Code)

To: Postmaster (or installation head) (office, state, and ZIP Code)

Meeting convened at:	(time)	(location)
In attendance:	(name)	Chairperson
	(name)	Secretary
	(name)	Title
	(name)	Title
Not in attendance:	(name)	Title
	(name)	Title
Agenda Items:	Unfinished business:	(Subject, action taken, etc.)
	New business:	(Subject, action taken, etc.)
	Problem areas which should receive increased emphasis:	(Brief report and recommendations, if any)
	Special items:	(This will include safety education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)
	Brief report, if any	
Meeting adjourned at:	(time)	

Signed: _____ **Chairperson**

_____ **Secretary**

Note: Copies of the minutes should be provided to the local president of each union and posted on employee bulletin boards.

Now that we have discussed committee membership, duties, responsibilities, and other basic committee activities, let's examine some of the common forms used to report hazards and accidents.

Review of Safety Records and Reports

There are a number of reports that the committee may use in carrying out its duties. The following are some examples. See Appendices 2, 3, and 4 for more.

- PS Form 1766, *Hazard Warning Card*.
- PS Form 1767, *Report of Hazard, Unsafe Condition, or Practice*.
- PS Form 1769, *Accident Report*.
- PS Form 1770, *Hazardous Materials Incident Report*.
- PS Form 1773, *Report of Hazard Log*.
- PS Form 1778, *Dog Warning Card*.
- PS Form 1783, *On-the-job Safety Review/Analysis (JSA)*.
- PS Form 2198, *Accident Report — Tort Claim*.
- PS Form 4584, *Observation of Driving Practices*.
- Standard Form 91, *Motor Vehicle Accident Report*.
- *OSHA 200 Log*.

Two very important sources of information for the Joint Labor-Management Safety and Health Committee are Forms 1767 and 1769. The following exercises should be based on local cases.

Exercise: Report of Hazard, Unsafe Condition, or Practice

Purpose:

- Review Form 1767.

Process:

- Hand out copies of local Form 1767 from which names and other identifying data have been removed.
- Remind participants that confidentiality should be maintained.
- In small groups, review local Form 1767 samples for completeness and corrective action taken to resolve the problem.
- Have participants discuss if the reports indicate patterns of unsafe conditions that warrant further review.
- Discuss what actions the committee may take.

Outputs:

- Report of groups findings.

One of the responsibilities of the committee is to review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*. These are important reports from employees as they are official safety communications to management. It is management's responsibility to respond and take necessary corrective actions.

The Joint Labor-Management Safety and Health Committee should review these reports to determine if effective action has been taken. In addition, the committee can identify specific areas that may need attention by noting the frequency of hazards reported in an area. Finally, reports of similar hazards may indicate a condition common to the entire facility.

Exercise: Accident Report

Purpose:

- Review local Form 1769, *Accident Report*, and safety reports.

Process:

- Hand out blank copies of Form 1769 with instructions.
- Hand out samples of accident reports from which names and other identifying data have been removed.
- In small groups, review the reports for completeness and correctness.
- In small groups, identify additional corrective actions if it is possible.
- In small groups, discuss if reports indicate a pattern of unsafe conditions that warrant further review.
- Discuss what actions the committee may take.

Outputs:

- Group report based on review of Form 1769.

Reviewing accident and injury reports (Form 1769) and other safety reports for your facility can identify trends that are unusual and stand out. This can be helpful in identifying problem areas and determining the effectiveness of local safety programs. Accident statistics for each accounting period should be compared to previous periods and to SPLY.

This page intentionally left blank

Module 3: Creating an Interest in Safety

Objective:

Participants will be able to:

- Create an interest in safety within the facility.

Time Allocated for Module:

- 1/2 hour.

Instructional Methods:

- Lecture.
- Discussion.

Summary:

- Make safety a value.
- Fine-tuning safety programs based on local needs.
- Encourage employees to make suggestions regarding safety.
- Promoting safety.

Participant Material Used:

- None.

Media Required:

- Flip charts.

For Further Information:

- Safety for Postal Leadership course.

One of the primary responsibilities of the Committee is to encourage an interest in safety for all employees. This goal can be accomplished in the following ways:

- Make safety a value.
- Lead by example.
- Create safety programs.
- Encourage all employees to make suggestions regarding safety.
- Use creative methods to communicate safety messages.

Safety as a Value

The importance of safety must not change for any reason. Unsafe acts or conditions must not be permitted even to meet service goals. Many times we seek short cuts in an effort to process the mail on time, meet delivery standards, or repair equipment that is desperately needed for mail processing. While mail processing, mail delivery, and equipment repair are high priorities, safety should be valued above them.

Members of the committee should lead by example. In this way they demonstrate a commitment to safety by their dress, attitude, and actions. Committee members can be made visible by conducting frequent informal safety inspections, quickly correcting safety problems, observing all safety rules without exception, and communicating often with employees about safety.

Fine-Tuning Safety Programs

Our postal work environment is constantly changing as new technology is introduced and processes are refined to meet new service goals.

New safety concerns must be quickly identified and safety programs constantly fine-tuned to prevent accidents that can result from this changing environment. Safety programs should include:

Engineering solutions, such as:

- Machine guarding.
- Proper equipment placement.

- Product substitution (nonhazardous chemicals in lieu of hazardous chemicals).

Administrative solutions, such as:

- Training and safety talks.
- Posters.
- Safe work practices.

Personal Protective Equipment (PPE), such as:

- Gloves.
- Eye protection.
- Hearing protection.

PPE should always be the last option when engineering or administrative solutions will not completely abate the hazard.

Encouraging Employee Participation

The more active the employees are in the safety program, the more effective it will be. Employees should be encouraged to use Form 1270, *Idea Proposal*, Form 1767, *Report of Hazard, Unsafe Condition, or Practice*, and other means to communicate safety concerns to the committee. Communication with the committee is to be made freely and without fear of reprisal.

Once an employee has expressed a concern, that individual must be kept informed of the progress toward resolution. Also, addressing a problem quickly and providing a rapid solution will maintain employee interest, confidence, and participation.

Promoting Safety

You are encouraged to be creative in the promotion of safety. Some suggestions are:

- Safety posters.
- Safety talks.
- Recognition and incentives.

- Safety contests.
- Training.

Employees can become bored with the *same old thing*. By using your imagination and occasionally changing the promotional activities, you can motivate employees to maintain an interest in safety. Attempt to find out what employees enjoy and capitalize on it.

Module 4: Enforcement of Safety Rules

Objective:

Participants will be able to:

- Give examples of how committee members can assist in enforcement of safety rules.

Time Allocated for Module:

- 1 hour.

Instructional Methods:

- Lecture.
- Discussion.
- Case study.

Summary:

- Committee responsibility.
- Employee responsibility.
- Why employees don't always follow the rules.
- How to help enforce programs.

Participant Material Used:

- None.

Media Required:

- Flip charts.
- Copies of case studies (one per group).

For Further Information:

- Safety for Postal Leadership.

Committee Responsibility

Another important function of the committee is to review local safety policies and rules. As stated earlier in this guide, changes in our workplace often result in changes in local safety programs.

Committee members are responsible for assisting in implementation of safety programs. Every postal employee is responsible for the observance of safety rules and performing their jobs in a safe manner.

Some key safety programs that are tracked by the Postal Service include:

- Lockout/Tagout Procedures.
- Bloodborne Pathogens.
- Hazard Communication.
- Emergency Action Plan.
- Walking and Working Surfaces.
- Hazardous Material Spill and Leak Response.
- Personal Protective Equipment.
- Powered Industrial Trucks.
- Asbestos Management.
- Hearing Conservation.
- Respiratory Protection.
- Lead Management.
- Confined Space.
- Safe Driving.
- Safe Lifting.

Employee Responsibility

Each and every postal employee is responsible for:

- Complying with both OSHA and postal safety and health programs, regulations, procedures, and practices.

- Keeping their work area in a safe and healthful condition.
- Reporting immediately any safety hazards and unsafe working conditions.
- Reporting immediately any accident in which they were involved regardless of the extent of injury or amount of damage.
- Keeping physically and mentally fit to meet the requirement of the job.
- Driving defensively and professionally; extending courtesy in all driving situations; obeying all state, local, and postal regulations when driving a vehicle owned, leased, or contracted by the Postal Service.

Why Employees Don't Always Follow the Rules

Exercise: What Me Worry

Purpose:

- Identify reasons why employees don't follow safety rules and policies.

Process:

- Break into small groups.
- Have each group brainstorm the most common reasons why employees break safety rules.
- List reasons on the group's flip chart.
- Post the lists on the walls around the room.
- Facilitate a discussion about possible means for enforcing the rules (training, posters, recognition, etc.).

Outputs:

- Group report and discussion.

How to Help Enforce Safety Programs

Exercise: Enforcement of Safety Programs

Purpose:

- Define actions that can be taken to assist in the enforcement of safety rules and policies.

Process:

- Break into groups with at least three persons in each group.
- Assign *one* of the following 5 case studies to each group.
- In small groups, read the assigned case study.
- Brainstorm and list the following on their flip chart: 1) hazard, 2) causes, 3) possible injury, and 4) possible solutions.
- Have each group appoint a spokesperson who will report their findings to the entire group.
- Solicit additional input from the whole group at the end of each presentation.

Outputs:

- Reports from each group on their findings.
- Class discussions to gain additional ideas.

Case Study 1: Dave

Dave has been a Mail Processing Mechanic for 6 years and has a good safety record. One of his responsibilities is to replace conveyor belt rollers on large bulk conveyors. The rollers are heavy and difficult to manage as he climbs ladders to the elevated conveyors.

He is uneasy about asking for help because it seems unmanly to do so. You observe Dave attempting to climb a ladder with one of the large rollers held with one hand and supported with his shoulder. How would you respond to this situation?

Case Study 2: Tami

Tami has been a mail handler for two years and has had one back injury from lifting. In an attempt to unload the mail from an unexpected additional trailer at the dock, she is placing pallets of bulk business mail in an aisle way. This aisle is seldom used because it is located at the very end of the dock. How would you respond to this situation?

Case Study 3: Jim

Jim is a mail handler and a certified powered industrial truck operator. His safety record shows that he has received disciplinary action for repeatedly hitting guardrails with his forklift.

You observe Jim driving forward with a load down a ramp. The load is also high enough to obscure his line of sight. How would you respond to this situation?

Case Study 4: Penny

Penny is an electronic technician at the BMC and is responsible for the maintenance of closed circuit television (CCTV) cameras used throughout the building to monitor mail flow. These cameras are often located in remote areas of the high bay and are usually reached by carefully climbing out on the steel beams to which they are attached.

Often dust and debris cover these beams. Penny is always very careful as she makes her way to the cameras and has never slipped. Her supervisor, Darrell, is aware of this practice, but has noticed that she doesn't seem to be afraid like the other ETs who have refused the assignment. How would you respond to this situation?

Case Study 5: Monica

Monica is a new employee and has been assigned as a machine operator in a delivery bar code sorter operation. Carol, the senior operator on this equipment, trained her.

Monica has to clear several jams during a tour as she sweeps the DBCS. Posters around the equipment state the importance of using emergency stops while clearing jams.

Monica is unsure of what using emergency stops will do to the machine's operation. Besides that, the machine is stopped already and Carol never uses them either. How would you respond to this situation?

Module 5: Committee Teamwork

Objective:

Participants will be able to:

- Demonstrate group collaboration and teamwork.

Time Allocated for Module:

- 1/2 hour.

Instructional Methods:

- Lecture.
- Discussion.
- Group Exercise.

Summary:

- Group synergy.
- The power of diversity.

Participant Material Used:

- None.

Media Required:

- Flip charts.

For Further Information:

- See Team Building (course 1730-10). Course materials can be downloaded from Training Course Materials on the Employee Development Web site at <http://blue.usps.gov/hrisp/ed/welcome.htm>.

Group Synergy

As a Joint Labor-Management Safety and Health Committee member you have accepted a great responsibility. However, it is not your burden alone.

Regardless of how much we can accomplish as individuals in striving for a safe and healthful workplace, more can be achieved when the committee acts together. This effort is called synergy: the power of the group is greater than the sum of each individual effort.

The Power of Diversity

Every individual brings to the group a unique combination of knowledge and experience from their personal life, their culture, and their career. When the group recognizes and draws upon these differences, they are strengthened by their diversity. When they deny individual differences, they are weakened.

The Joint Labor-Management Safety and Health Committee is able to draw upon these strengths:

- Members have diverse work experiences.
- Members can communicate with other postal employees at many different levels.
- The committee brings labor and management around the table to address safety issues that benefits the employee, the business, and the customer.

Exercise: The Green Vegetable

Conclude the training with the *Green Vegetable* exercise to demonstrate synergy. Use this to demonstrate how much more powerful the group is when individual ideas are combined. This can also be a great demonstration of the power of diversity if some of the green vegetables are unknown to some members of the group.

Purpose:

- Recognize the benefits of synergy and diversity.

Process:

- Have each person list as many green vegetables as possible in 5 minutes.
- Have each person count how many he or she has listed. Recognize the person that has the largest list.
- Have the instructor go around the room to each person in turn and ask for an item from their list. Each vegetable will be written on a flip chart.
- Continue going around the room until a list has been made of all of the vegetables that were on each list. If an individual runs out of vegetables to suggest, they will simply say *pass* and the next person will give another from his or her list.
- Have each person cross any item off his or her list that has been given by another and listed on the flip chart.
- Compile individual lists into one group list.
- Count the number of vegetables on the flip chart. It will be a much larger number than any individual's.

Outputs:

- Demonstration of synergy and diversity.

Conclusion

- Safety depends on you!
- Small celebration of thanks for class participation and completion.

This page intentionally left blank

Appendices

1. Participant Roster
2. Postal Manuals, Handbooks, and Publications
3. Non-Postal Manuals, Handbooks, and Publications
4. Forms Used by the Postal Service

This page intentionally left blank

Appendix 1 — Participant Roster



Participant Roster Joint Labor-Management Safety and Health Committee Training

Course # _____ Date _____

Name	Job Title	Level	Soc. Sec. #	Finance #	Facility
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					
13.					
14.					
15.					
16.					
17.					
18.					
19.					
20.					
21.					
22.					
23.					
24.					
25.					

This page intentionally left blank

Appendix 2 — Postal Manuals, Handbooks, and Publications

As a leader, you will not necessarily use all of these references or forms. These are references used by the Safety and Injury Compensation sections. They are listed here for your information.

- ELM Subchapter 540, Injury Compensation Program.
- ELM Chapter 8, Safety and Health.
- Handbook EL-505, *Injury Compensation, Procedures for Control Offices/Points*.
- Handbook EL-515, *Rehabilitation Program Guidelines*.
- Handbook EL-801, *Supervisor's Safety Handbook*.
- Handbook EL-802, *Executive's and Manager's Safety Compliance Guide*.
- Handbook EL-803, *Maintenance Employee's Guide to Safety*.
- Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*.
- Handbook EL-810, *OSHA Programs*.
- Handbook EL-811, *Accident Report User's Guide*.
- Handbook EL-812, *Hazardous Materials and Spill Response*.
- Handbook EL-814, *Employee's Guide to Safety*.
- Handbook PO-502, *Container Methods*.
- Handbook PO-516, *Highway Contractor Safety* (Pocket Edition).
- Handbook PO-517, *Guide for Safe Use of the Eastern Region Mail Container*.
- Publication 52, *Hazardous, Restricted, and Perishable Mail*.
- Publication 129, *Safety Talks*.
- Publication 174, *How to Avoid Dog Bites: Dogs and Dog Repellent*.
- Unnumbered, *Rural Carrier Safety (Craft & Management: It's a Joint Effort)*.

This page intentionally left blank

Appendix 3 — Non-Postal Manuals, Handbooks, and Publications

As a leader you may wish to access other references relating to safety. These are listed here for your information.

- Occupational Safety and Health Standards for General Industry (29 CFR Part 1910): This is produced by the Occupational Safety and Health Administration and is available through CCH Incorporated at 4025 W. Peterson Ave., Chicago, IL 60646-6085; telephone 1-800-248-3248; or online at <http://www.cch.com>.
- Occupational Safety and Health Standards for the Construction Industry (29 CFR Part 1926): This is produced by the Occupational Safety and Health Administration and is available through CCH Incorporated at 4025 W. Peterson Ave., Chicago, IL 60646-6085; telephone 1-800-248-3248; or online at <http://www.cch.com>.
- Recording and Reporting Occupational Injuries and Illness (29 CFR Part 1904): This is available in hard copy from OSHA or at http://www.osha-slc.gov/OshStd_toc/OSHA_Std_toc_1904.html.
- “Training Requirements” in *OSHA Standards and Training Guidelines* (OSHA 2254 revised 1998).
- *Training and Record Keeping: OSHA/EPA/DOT Cross Reference Manual*. This is produced by J.J. Keller and Associates, Inc. at 3003 W. Breezewood Lane, P.O. Box 368, Neenah, WI 54957-0368; telephone 920-722-2848; or online at <http://www.jjkeller.com>.
- *All About OSHA* (OSHA Publication 2056): This is available through the U.S. Government Printing Office, Superintendent of Documents, Mail Stop: SSOP, Washington, DC 20402-9328.
- *OSHA: Employee Workplace Rights* (OSHA Publication 3021): This is available through the U.S. Government Printing Office, Superintendent of Documents, Mail Stop: SSOP, Washington, DC 20402-9328.

This page intentionally left blank

Appendix 4 — Forms Used by the Postal Service

- PS Form 1700, *Accident Investigation Worksheet*.
- PS Form 1766, *Hazard Warning Card*.
- PS Form 1767, *Report of Hazard, Unsafe Condition, or Practice*.
- PS Form 1768, *Safe Driver Award Committee Decision*.
- PS Form 1769, *Accident Report*.
- PS Form 1770, *Hazardous Materials Incident Report*.
- PS Form 1772, *Accident Log*.
- PS Form 1773, *Report of Hazard Log*.
- PS Form 1778, *Dog Warning Card*.
- PS Form 1783, *On-the-Job Safety Review/Analysis (JSA)*.
- PS Form 2016, *Mail Theft and Vandalism Complaint*.
- PS Form 2198, *Accident Report — Tort Claim*.
- PS Form 2491, *Medical Report — First Aid Injuries*.
- PS Form 2548, *Individual Training Record — Supplemental Sheet*.
- PS Form 3956, *Authorization for Medical Attention*.
- PS Form 4584, *Observation of Driving Practices*.
- PS Form 4585, *Postal Driver Accident Information (card)*.
- PS Form 4586, *Accident Information*.
- Item 087-H, *Vehicle Accident Report Kit*.
- CA-1, *Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation*.
- CA-2, *Notice of Occupational Disease and Claim for Compensation*.
- CA-2A, *Federal Employee's Notice of Recurrence of Disability and Claim for Continuation of Pay/Compensation*.

- CA-6, *Official Superior's Report of Employee's Death.*
- CA-7, *Claim for Compensation on Account of Traumatic Injury or Occupational Disease.*
- CA-16, *Authorization for Examination and/or Treatment.*
- CA-17, *Duty Status Report.*
- CA-20, *Second part of CA-7 (Report of Physician).*
- Standard Form 91, *Motor Vehicle Accident Report.*
- Standard Form 95, *Claim for Damage, Injury, or Death.*

Tab 3

ELM Chapter 8

Safety and Health Program



NALC Guide to Safety and Health

8 Safety and Health

810 Occupational Safety and Health Program

811 General

811.1 Authority

The Postal Service is subject to Public Law No. 91–596, the Occupational Safety and Health (OSH) Act of 1970, pursuant to the Postal Employees Safety Enhancement Act (PESEA) of 1998. The OSH Act provides for citations, penalties, and criminal referrals for those employers who fail to comply. The Occupational Safety and Health Administration (OSHA) is responsible for promulgating and enforcing standards and regulations under the OSH Act.

811.2 Principles

811.21 Management Commitment, Involvement, and Accountability

Managers must demonstrate commitment to providing safe and healthful working conditions in all postal-owned and postal-leased installations, become involved in day-to-day safety performance, and be held accountable for safety performance and compliance with OSHA standards and regulations (see Handbook EL-802, *Executive's and Manager's Safety Compliance Guide*).

811.22 Vision Statement

The Postal Service will become a leader in occupational safety and health for the federal government and private sector by demonstrating a commitment to integrating working safely into all our services.

811.23 Guiding Principles

People — Employees are our most valued resource. Our employees must be provided a safe and healthful workplace.

Customers — When our employees work safer, our performance is improved.

Excellence — We can demonstrate that management and employee attention to working safely is good business.

Integrity — As a leader in occupational safety and health, we enhance our integrity with our customers, business partners, and the Congress.

Community Responsibilities — When our employees work safely, our customers are safer and we lead other employers by example.

811.24 **Safety Philosophy**

It is the position of the Postal Service that:

- a. Any injury can be prevented. This goal is realistic, not just theoretical. Supervisors or managers have primary responsibility for the well-being of employees and must fully accept this principle.
- b. Management, which includes all levels including the first-line supervisor, is responsible and accountable for the prevention of accidents and control of resultant losses. Just as the line organization is responsible for attaining production levels, ensuring quality of performance, maintaining good employee relations, and operating within cost and budget guidelines, supervisors and managers must likewise accept their share of responsibility for the safety and health of employees.
- c. It is possible to safeguard against all operating exposures that can result in accidents and injuries and illnesses. It is preferable to eliminate the sources of danger. However, where this is not practical, management must use protective measures such as machine guards, safety devices, administrative actions, and personal protective equipment.
- d. All employees must be trained in proper work procedures and must be educated to work safely and to understand that they are responsible for doing so. Management is responsible for the adequate safety training and education of employees. However, all employees are responsible for working safely, and in being so, they benefit not only their organization but also themselves in a very real way.
- e. It is good business from the standpoint of both efficiency and economy to prevent personal injuries on and off the job. In addition to humanitarian considerations, injuries drain resources and reduce efficiency.

811.3 **Offsite Safety**

The Postal Service Safety and Health Program and OSHA standards and regulations cover postal employees who perform postal duties in establishments of private employers and during delivery and other activities off postal property. Safe and healthful working conditions must be provided through engineering or administrative controls, personal protective equipment, enforcement of safe work practices, withdrawal of the employees from the private sector facility, or curtailment of mail, if necessary, to ensure that they are protected.

811.4 **Records Retention and Disposition**

For retention and disposal instructions for the records and forms referenced in 810 through 850, see items 32 through 42 of the Appendix, *Records Control Schedules*, or the Records and Information Management Systems, RIMSWEB.

812 **Management Responsibilities**

812.1 **Headquarters**

812.11 **Postmaster General**

The postmaster general is responsible for the establishment and maintenance of an effective, comprehensive occupational safety and health program that fully complies with the OSH Act.

812.12 **Chief Operating Officer**

The chief operating officer ensures that area management implements and maintains effective safety and health programs by, among other activities, monitoring Executive Safety and Health Committee activities during business quarterly reviews.

812.13 **Officers**

Officers of the Postal Service are delegated the authority and responsibility to ensure safe and healthful working conditions and practices within their functional areas and compliance with OSHA standards and regulations.

812.14 **Vice President of Employee Resource Management**

The vice president of Employee Resource Management (ERM) is delegated the authority and responsibility to administer and evaluate the safety and health program.

812.2 **Area Offices**

812.21 **Vice President of Area Operations**

Vice presidents of Area Operations are responsible for providing effective safety and health programs in their areas and compliance with OSHA standards and regulations

812.22 **Area Human Resources Managers**

Area Human Resources managers are responsible for monitoring safety and health programs and performance in conformance with national policy and direction.

812.3 **Installation Heads**

Installation heads are responsible for employee safety and health and for compliance with OSHA standards and regulations, including maintenance of the OSHA Log and Summary of Injuries and Illnesses. Their responsibility includes the development and implementation of an effective safety and

health program. They must formulate and post a local safety and health policy statement consistent with national policy. Installation heads in facilities without full-time safety personnel also act as or designate the collateral duty facility safety coordinator (FSC) (see 813.32 and Handbook EL-802, *Executive's and Manager's Safety Compliance Guide*).

812.4 **Middle-Level Managers**

Middle-level managers are responsible for the safety and health program within their operations. This responsibility includes OSHA-mandated written programs, employee training, accident prevention activities, and evaluation of supervisor safety performance. Middle-level managers coordinate activities, including the correction of identified safety deficiencies, with other operational managers.

812.5 **Supervisors**

First-line supervisors are responsible for implementing written programs and plans, safety and health training, completion of Form 1783, *On the Job Safety Review/Analysis*, for their area, observing employees' safety performance, and preventing operational safety errors. Specific responsibilities are listed in applicable management instructions and in Handbook EL-801, *Supervisor's Safety Handbook*.

812.6 **Objectives and Action Plans**

All managers, at every level in every function, must have specific fiscal year safety and health objectives, with accompanying action plans for their accomplishment. These plans should be based on accident, injury, and illness experience, and safety and health program evaluations. Action plans must list specific activities that will be taken to reduce accidents and injuries and ensure compliance with OSHA standards and regulations.

813 **Safety and Health Staff Responsibilities**

813.1 **Headquarters**

Safety Performance Management (SPM), Employee Resource Management, assists the vice president of Employee Resource Management in the administration and evaluation of the safety and health program by monitoring and improving the program and related safety and health policies, procedures, and standards. Safety Performance Management, in conjunction with the General Counsel and other functional organizations, establishes policy and procedures to manage OSHA compliance activity, including citations, penalties, abatement, negotiated settlements, and OSHA-related judicial procedures. To ensure that safety is integrated into all postal operations to provide a safe work environment, Safety Performance Management provides safety and health expertise and staff support to other Headquarters functional areas and area offices, as necessary. Safety Performance Management provides comment on proposed OSHA regulations to Government Relations and coordinates and works with other

federal agencies, private sector employers, and professional groups on matters of safety and health.

813.2 **Area Offices**

The area Human Resources manager assists the area vice president in the implementation of national safety and health policies, programs, and directives. This responsibility includes long-term planning and monitoring activities. Area Human Resources managers, in conjunction with field legal counsels, provide oversight and advice on OSHA compliance activities.

The area Human Resources manager supports the performance clusters in the administration of their safety and health programs and monitors status of the OSHA Log and Summary of Injuries and Illnesses. Responsibilities include budgeting for and scheduling safety and health resources, including professional development of the safety and health staff. Additionally, the area Human Resource function provides technical support for performance cluster safety personnel and collateral duty facility safety coordinators (FSC).

813.3 **Performance Clusters**

813.31 **Safety Personnel**

Safety personnel are responsible for developing and monitoring a comprehensive safety and health program for facilities within their geographical boundaries.

While the specific responsibilities of safety personnel may vary depending on the size of the organization, the number of locations, and the type of operations, the major function is that of a technical advisor and consultant to line management. To support line management, they contribute their experience, knowledge, and judgment to the formation of management's decisions that affect safety and health. Safety personnel functions include:

- a. Monitoring status of the OSHA Log and Summary of Injuries and Illnesses for all facilities in the cluster and advising management of deficiencies.
- b. Collaborate with management representatives on preparing and administering written OSHA-required programs.
- c. In coordination with the injury compensation and medical staff, assisting the line organization in solving safety and health problems, interpreting policies, standards, and regulations and providing management with detailed actions to be taken.
- d. Analyzing accident, injury, and illness statistics, hazardous condition reports, inspection results, and related data in order to advise management on corrective actions.
- e. Identifying and assessing accident and loss-producing conditions, practices, and trends.
- f. Conducting periodic safety and health inspections and program evaluations.

Additionally, full-time district safety personnel assist collateral duty facility safety coordinators with technical advice and support, OSHA reporting, and related issues.

813.32 **Collateral Duty Facility Safety Coordinator**

The installation head or designee is the collateral duty facility safety coordinator (FSC) in facilities in which there are no full-time safety positions and performs safety-related duties appropriate to the size and function of the facility. The FSC also conducts the annual safety and health inspection in his or her facility if there are less than 100 workyears of employment (see 824.33). He or she performs the inspection under the guidance of the servicing safety office. The FSC also maintains an Accident Log if required (see 821.34). FSCs must be trained commensurate with their duties, using postal approved courses.

814 **Employee Rights and Responsibilities**

814.1 **Rights**

Employees have the right to:

- a. Become actively involved in the Postal Service's Safety and Health Program and to be provided a safe and healthful work environment.
- b. Report unsafe and unhealthful working conditions, using Form 1767, *Report of Hazard, Unsafe Condition, or Practice*.
- c. Consult with management through appropriate employee representatives on safety and health matters, i.e., program effectiveness and participation in inspection activities where permissible.
- d. Participate in the safety and health program without fear of restraint, interference, coercion, discrimination, or reprisal.

814.2 **Responsibilities**

It is the responsibility of all employees to:

- a. Comply with all OSHA and postal safety and health regulations, procedures, and practices, including the use of approved personal protective equipment.
- b. Keep the work area in a safe and healthful condition through good housekeeping and proper maintenance of property and equipment.
- c. Immediately report safety hazards and unsafe working conditions.
- d. Perform all duties in a safe manner.
- e. Keep physically and mentally fit to meet the requirements of the job.
- f. Immediately report any accident or injury in which they are involved to their supervisors, regardless of the extent of injury or amount of damages.

- g. Drive defensively and professionally; extend courtesy in all situations; and obey all state, local, and postal regulations when driving a vehicle owned, leased, or contracted for by the Postal Service.

815 **Executive and Management Safety and Health Committees**

815.1 **Structure and Responsibilities**

815.11 **National Executive Safety and Health Committee**

(Reserved)

815.12 **Area Executive Safety and Health Committee**

The area executive safety and health committee — chaired by the area vice president and consisting of district managers, area office managers (as determined by the vice president), and chief postal inspectors — must meet at least quarterly. The area vice president establishes a system to track and monitor committee activities. The committee is responsible for following objectives established by the national Headquarters action plan and/or for establishing area action plans (using process management or other means) that achieve national and area goals. The area committee must monitor and review:

- a. Required safety and health inspections and abatement actions.
- b. Required program evaluation and implementation.
- c. Safety and health training and recordkeeping.
- d. Local joint labor-management safety and health committee activities.

The chief operating officer, during business quarterly reviews, monitors area executive committee activities.

815.13 **Performance Cluster Executive Safety and Health Committees**

The performance cluster executive safety and health committee, chaired by the district manager, must meet quarterly. The committee must include plant managers, postmasters of large associate offices, critical enabling managers (e.g., Maintenance, In-Plant Support), and others as determined by the district manager and the committee. Their primary responsibilities are to review:

- a. Required safety and health inspections and abatement actions.
- b. Required program evaluation and implementation.
- c. Safety and health training and recordkeeping.
- d. Local joint labor-management safety and health committee activities.

The committee must report to the area on actions taken, and the area vice president must establish a system to track and monitor committee activities. The committee develops additional action plans to improve situations not addressed at a higher level. In addition, the committee must continually assess the adequacy of safety and health staffing at the plant level and must

monitor the quality and frequency of safety inspections and abatement activities within the performance cluster.

815.14 **Plant* Executive Safety and Health Committee**

The committee, chaired by the plant manager, is composed of plant safety, maintenance, and other enablers as appropriate. The committee meets as often as needed, but at least once every quarter. Primary responsibilities are to implement objectives established at a higher level and to develop additional objectives to improve the local safety and health program. To achieve these objectives, the committee must review and discuss safety and health program evaluations of the facility, accident injury trends, accident reports, OSHA compliance activity, and local safety inspection reports to identify the major safety and health problems. Based on these identified problems, the committee develops and implements action plans — with assigned responsibilities for improvement — and measures their effectiveness (using process management or other means). When objectives are not being met, action plans must be altered accordingly.

*Plants by definition include BMCs.

815.15 **Other Levels**

Safety and health management committees need not be established at levels below the plant, but safety and health must be a standard agenda item for regular staff meetings.

815.2 **Written Minutes**

Written minutes of all management meetings at each organizational level must be prepared and retained for a period of 3 years. A copy of the area, performance cluster, and plant minutes must be submitted to the chairperson's immediate manager.

816 **Joint Labor-Management Safety and Health Committees**

Reference Note:

For additional material concerning the subject matter found in 816, refer to:

- Article 14 of the collective bargaining agreements.

Joint labor-management safety and health committees must be established and must function in accordance with applicable collective-bargaining agreements.

817 **Training and Education**

817.1 **Management Training and Education**

817.11 **Supervisors**

All supervisors must receive safety and health training in accordance with the curriculum established by Safety Performance Management and Employee Development. Local offices, districts, and/or Headquarters provide this training.

817.12 **Executives and Managers**

Executives and managers at the plant level and above must be provided an orientation that discusses their responsibility for:

- a. Safety and health program commitment, involvement, and accountability.
- b. OSHA compliance.
- c. Elements contained in a safety and health program evaluation.
- d. Accident investigation and reporting.
- e. Safety and health training requirements.

817.2 **Safety and Health Staff Training and Education**

Safety and health personnel must be provided, at least annually, professional training and education to enable them to carry out their basic duties and to fulfill their roles as advisors and consultants to management. Collateral duty FSCs must also be trained commensurate with their safety-related duties. Safety Performance Management mandates postal and/or external training or curriculums, as necessary, to ensure an effective safety staff and OSHA compliance. To maintain their technical proficiency, safety and health personnel are encouraged to pursue professional credentials and advanced education and to participate in professional safety and health-related organizations. Management must give a high priority to supporting these efforts to realize a professional safety staff. Specialized training not available within the Postal Service may be authorized in accordance with 740.

817.3 **Joint Labor-Management Safety and Health Committee Orientation**

Each member of a local committee must receive an orientation by the Postal Service that includes:

- a. Responsibilities of the committee and its members.
- b. OSHA compliance.
- c. Basic elements of the safety and health program.
- d. Identification and analysis of hazards and unsafe practices, including job safety analyses.
- e. Explanation of reports and statistics to be reviewed and analyzed by the committee.

817.4 Employee General Safety Orientation

All employees, including casuals and part-time employees, must receive a general safety and health orientation and sufficient on-the-job training to enable them to follow safe work practices, to recognize hazards, and to understand the benefits to be gained by following safe work practices. Such training must also include applicable safety rules and OSHA compliance, including any local job safety analysis for tasks assigned. All employees must be trained as required by OSHA standards if their jobs so require (see 817.5).

817.5 OSHA Required Training**Reference Note:**

For additional material concerning the subject matter found in 817.5, refer to:

- Management Instruction EL-810-2000-2, *Bloodborne Disease Exposure Control Plans*.
- Management Instruction EL-810-96-1, *Response to Hazardous Materials Releases*.
- Management Instruction EL-810-96-2, *Hazard Communication Programs*.
- Management Instruction EL-810-98-1, *Asbestos Containing Materials Control Program*.
- Management Instruction EL-810-99-1, *Lead Hazard Management*.
- Management Instruction EL-810-2000-1, *Hearing Conservation Programs*.
- Handbook AS-556, *Asbestos Management Guide*.
- Management Instruction EL-810-93-1, *Confined Space Safety*.
- Current safety-related MMOs (e.g., Lockout/Tagout, Hazard Communication, Personal Protective Equipment), and memorandums of policy on the Safety and Health homepage.

817.51 Standard Curriculum

Employee Development, in coordination with Safety Performance Management and other Headquarters functional areas, is responsible for developing, implementing, and keeping current a safety and health training curriculum to comply with OSHA standards and postal policies. Managers and supervisors at all levels must refer to this curriculum and ensure that all affected employees are trained and that training is current and properly recorded.

817.52 Special Emphasis Program Training

Special emphasis training programs must be developed and initiated by Headquarters, areas, districts, plants, and other offices as appropriate, in

accordance with 721.22, to reduce the principal causes of accidents and injuries and occupational illnesses and ensure OSHA compliance.

817.53 **Hazardous Materials Communication and Training**

In installations where employees handle or transport hazardous materials, the installation head must establish a program of promoting safety awareness through communications or training, as appropriate (see MI-EL-810-96-1). Such a program must include, but is not limited to, the following elements:

- a. Posting of information, pamphlets, or publication of articles in postal publications such as area bulletins and use of distributed videos on *Hazwoper Awareness* and *Hazcomm Awareness*.
- b. Distribution of Publication 52, *Acceptance of Hazardous, Restricted, or Perishable Matter*, to employees whose duties may require acceptance or dispatch of hazardous or perishable items. Distribution of Handbook EL-812, *Hazardous Materials and Spill Response*, to employees whose duties may include handling of hazardous materials and initial response to spills and leaks (First Responder Awareness Level). Acceptance and dispatch personnel must use Tag 44, *Sack Contents Warning*, to appropriately identify all mailbags containing hazardous materials as defined in Publication 52 so that an employee handling the mail is aware that the mailbag contains one or more hazardous materials.
- c. On-the-job awareness training of employees whose duties may require the handling or transportation of hazardous or perishable items. This training must include, but is not limited to, (1) hazard identification, (2) proper handling of hazardous materials, (3) personal protective equipment availability and its use, and (4) cleanup and disposal requirements for hazardous materials.

817.6 **Refresher Training**

Motor vehicle, powered industrial truck, asbestos, hazardous materials, and other refresher training programs must be developed and provided per OSHA regulations and postal policies. Such programs must also be used for correction of improper work practices before accidents result and/or for improvement training following an accident.

817.7 **New or Additional Equipment and Techniques Training**

Training must be provided when new or additional equipment or techniques are deployed that may, if not properly used, adversely affect safe and healthful working conditions and/or OSHA compliance.

817.8 **OSHA Poster 2203, Job Safety and Health Protection**

Each facility must post OSHA Poster 2203, *Job Safety and Health Protection*, in a conspicuous place. This poster outlines management responsibilities and employee responsibilities and rights under the OSH Act. Both English and Spanish versions are available from the material distribution centers.

817.9 Training Records

Records of safety and health training must be maintained for each employee. These records must be retained to demonstrate compliance with Postal Service policies and OSHA requirements. The records must be available to allow inspection in a timely manner by Postal Service and/or OSHA officials. All safety training must be recorded on Form 2548, *Individual Training Record* (or equivalent), and/or recorded into the National Training Database.

Note: Documentation of safety talks and safety related on-the-job training must be maintained at the facility level. These records must be available to allow inspection in a timely manner.

818 Safety and Health Program Budgeting

All organizational levels must plan budgets and provide funds that support an effective and comprehensive safety and health program. Such budgeted items must include, but are not limited to:

- a. Sufficient personnel and support to properly implement and administer the program at all levels, including necessary administrative costs such as those for training, computers, travel, communication, and personal protective equipment.
- b. Hazard analysis, including industrial hygiene evaluations, sampling, testing, diagnostic and analytical tools and equipment, and laboratory analyses, as deemed appropriate.
- c. Any necessary contracts to identify, analyze, or evaluate unsafe or unhealthful working conditions and operations, as deemed appropriate.
- d. Development and delivery of safety awareness and promotional programs.
- e. Technical information documents, software, books, standards, codes, periodicals, and publications.

819 Accountability for Safety and Health Performance, Compliance, and Evaluations

In any evaluation of individual performance or potential, provisions must be made to include the achievement or failure of managers, supervisors, and/or employees in the performance of their safety and health responsibilities, including OSHA compliance. Evaluations must not be based solely on the number and seriousness of accidents, injuries, and illnesses experienced but also on how effectively the safety and health program has been implemented and supported.

820 Reports and Investigations, Program Evaluations, and Inspections

821 **Actions in the Event of Accident, Injury, or Illness**

821.1 **Injury, Illness, and Accident Reporting**

821.11 **Overview of Overlapping Postal and OSHA Reporting and Logging Requirements**

The Postal Service is required by OSHA regulations to record occupational injuries and illnesses in a log and summary format and maintain a supplementary record of occupational injuries and illnesses. In addition, the Postal Service maintains the Human Resources Information System (HRIS) Safety and Health Subsystem, to meet safety and health program and business needs. To avoid duplication, Form 1769, *Accident Report*, is used both for inputting accidents into the Safety and Health Subsystem, and conducting subsequent analyses and for fulfilling OSHA requirements for a supplementary record of occupational injuries and illnesses (in lieu of the OSHA form). This extended use of the Form 1769 is accomplished by using the "Narrative" block to record the additional information required by OSHA. See 822 for additional OSHA and postal serious accident and fatality reporting.

821.12 **Reporting Requirements**

821.121 **General Requirements for Using Form 1769, Accident Report**

The manager or supervisor of the employee or operation involved must:

- a. Report all accidents and occupational injuries and illnesses on Form 1769, *Accident Report*, within 24 hours of the date of the accident, the diagnosis of injury or illness, or the notification of the manager or of the situation.
- b. Provide a copy of Form 1769 to the employee involved upon written request.

Completion of the form is required by postal policy if an accident occurs and by the OSH Act if an occupational injury or illness that is recordable by the OSHA definition occurs, regardless of tort claim action or the requirements of the Federal Employees' Compensation Act.

Note: Form 1769 definitions are not the same as that of OSHA's private sector recording requirements. Part 1904.12 [c] contains OSHA's definitions of injuries and illnesses.

Information submitted to the Office of Workers' Compensation Programs (OWCP) on Forms CA-1, *Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation*, and CA-2, *Notice of Occupational Disease and Claim for Compensation*, must be identical with that on Form 1769.

821.122 OSHA Requirements

Requirements for recording OSHA recordable injuries and illnesses and maintaining a supplementary record (using Form 1769 in lieu of the OSHA form, see 821.131) are published in OSHA Publication OMB 1218 0176, *Recordkeeping Guidelines for Occupational Injuries and Illnesses*. This publication is available through field safety professionals, and is also available on the OSHA Website at <http://www.osha.gov>. See Section 821.142 and consult with safety professionals regarding maintenance of the OSHA log and summary.

821.123 HRIS Requirements

Form 1769 must be recorded in the Safety and Health Subsystem by the servicing safety office when any one of the following situations occurs:

- a. An employee injury or illness is reported. The appropriate OSHA recordable indicator and postal reportable status are identified in the Safety and Health Subsystem by a safety professional using OSHA recordkeeping guidelines for determining OSHA recordables, and PS Form 1769 instructions for postal reportability.
- b. A CA-5 or a CA-6, *US Dept of Labor Official Superior's Report of Employee's Death*, is submitted to the OWCP.
- c. An injury or fatality to a nonpostal person on postal premises occurs. Note that this is not an OSHA recordable event unless a contractor is involved (see OSHA Publication OMB 1218 0176).
- d. A motor vehicle accident occurs that results in death, injury, or property damage, regardless of costs or who was injured (if anyone) or what property was damaged.
- e. Damage of \$500 or more to postal property or to property of customers or the general public occurs, regardless of whether an injury was involved.
- f. Fire damage of \$100 or more to postal property occurs.

821.13 Reporting Using Form 1769**821.131 Completing Form 1769**

The manager or supervisor of the employee or operation reports all accidents and occupational injuries and illnesses on Form 1769 within 24 hours, using the "Narrative" block to record the employee's home address and the full circumstances of the accident — the who, what, when, where, why, and how of the injury or cause of illness.

821.132 Reviewing Form 1769

Review is conducted as follows:

- a. The *supervisor's immediate manager* reviews each Form 1769 as to its accuracy and application (including OSHA recording status), conducts a follow-up to ensure that positive action has been taken to prevent similar occurrences, and endorses the report in Item 57.
- b. The *installation head* or designee must review the report to see if positive action has been taken or is planned.

- c. *Servicing safety personnel* must ensure that accident causes are identified, that the action taken is appropriate, and endorse the report in Item 59.

821.133 **Notifying the Safety Office of Controverted Claims**

If a traumatic injury or CA-2 is controverted and the OWCP sustains the controversion, notify the servicing safety office to amend the HRIS records.

Note: There is no relationship between OSHA records and the decision of the OWCP.

821.134 **Notifying the Safety Office of Corrections**

Correct erroneously recorded data by submitting a copy of the Form 1769, annotated "Amended," through the servicing safety office to the HRIS. Circle the items that need to be corrected and enter the correct data. Make corrections to the OSHA log and summary if necessary, in accordance with OSHA Publication OMB 1218 0176.

821.14 **Maintaining Logs and Summaries**

821.141 **Postal Accident Log**

Each facility, i.e., plant, associate office, station, branch, etc., must maintain an accident log, by fiscal year, of all accidents recorded in the Safety and Health Subsystem, using Form 1772, *Accident Log*, or electronic equivalent (see 821.34). Enter accident information within 5 working days after receiving Forms 1769. Make entries in sequential order and number as necessary.

Exception: Maintenance of station and branch accident logs at the appropriate plant or associate office level is permitted if provisions are made for at least semiannual feedback of data to each station or branch for local management, employee representatives, and employee access. (An OSHA log and summary must be maintained for every facility, however.)

Note: This form is *not* the OSHA log and summary, but a separate log of *all* accidents recorded in the Safety and Health Subsystem.

821.142 **OSHA Annual Summary of Injuries and Illnesses**

Each facility must maintain a log and summary, by calendar year, of OSHA recordable occupational injuries and illnesses from Forms 1769. All such injuries and illnesses must be recorded on the log within 6 days of receipt of the information. A copy of the log, updated within 45 calendar days, must be present at all times in the facility. Post copies of the summary for a minimum of 30 consecutive days (NLT February 1 to March 1) in a conspicuous place(s) at every facility. Maintain and retain the OSHA log and summary for 5 years following the end of the calendar year.

821.2 **Accident Investigation**

821.21 **Responsibility**

Managers and supervisors are responsible for investigating all accidents promptly, determining their cause(s), and reporting them accurately in accordance with OSHA and postal regulations. Management should consult with safety personnel when accident causes cannot be readily determined.

821.22 Method

In order to have first-hand knowledge of every accident occurring in their operation, supervisors must make thorough investigations that include at least the following:

- a. Interview employee(s) to determine what caused the accident, why it happened, and what the employee(s) and supervisor feel could have been done to prevent it.
- b. Promptly inspect the accident site to determine what conditions (equipment, work practice, etc.) contributed to the accident.
- c. Interview witnesses and fellow workers.
- d. Examine the most recent Form 1783, *On-the-Job Safety Review/Analysis*, for the task involved to determine if changes are required, update as needed, and review with all affected employees. If no PS Form 1783 is on file, determine if one is necessary and if so prepare it.

821.3 Accident Analysis**821.31 Purpose**

Accident analysis is vital in accident prevention programs. Reports and statistical analyses are used to identify principal cause factors of accidents and hazardous conditions and serve to prompt management action to reduce or eliminate the factors and conditions.

821.32 Responsibility

All installations must develop methods to identify accident prevention program needs.

821.33 Elements

The elements of statistical analysis should include, but are not limited to:

- a. Specific tasks being performed at the time of an accident or injury.
- b. Operation, equipment, tools, and machinery involved.
- c. Specific event that resulted in an accident or injury.
- d. Nature and severity of injury.
- e. Part of body involved.
- f. Incidence and nature of the following:
 - (1) Faulty equipment or design.
 - (2) Unsafe condition.
 - (3) Unsafe acts or practices.
 - (4) Violation of rules, procedures, or instructions.
 - (5) Inadequate training or lack of safety rules or procedures.

821.34 Report 10, Safety and Health Subsystem, Accident Analysis Summary

Report 10, or equivalent, is used to analyze accidents and to determine local program needs.

821.4 **Privacy Act Considerations**

Accident records, including the left side of the OSHA log and summary, contain information about individuals. As such, they may be handled and disclosed only in accordance with the Privacy Act and implementing instructions.

An individual's accident records and related correspondence are maintained within the Postal Service as the privacy system entitled Postal Service 120.035, Personnel Records — Employee Accident Records.

822 **Supplementary Actions in the Event of Serious Accidents, Including Fatalities**

822.1 **Reporting Serious Accidents**

822.11 **Installation Head Preliminary Serious Accident Report**

The installation head must report serious accidents as follows:

- a. To the performance cluster manager, any serious accident. The term *serious accident* includes:
 - (1) Any occupational accident that is fatal to one or more employees.
 - (2) Any occupational accident that results in the in-patient* hospitalization of one or more employees.
 - (3) Any occupational illness or disease that results in the death of an employee.
 - (4) Any postal-related accident involving nonpostal persons that results in a fatality or the in-patient* hospitalization of one or more persons.
 - (5) Any occupational accident that is not immediately reportable but that results in the death of an employee or nonpostal person within 6 months of the date of the accident.
 - (6) Any occupational injury to an employee or nonpostal person that involves mutilation, amputation (including major cartilaginous body parts such as ears, nose, etc.), or loss of vision in one or both eyes.
 - (7) Any occupational accident that involves property damage (combined postal and nonpostal) estimated to exceed \$100,000.
 - (8) Any occupational accident that results in in-patient* hospitalization due to chemical exposure.

*Inpatient hospitalization does not include observation, emergency room, and all other forms of out-patient care.

- b. *After consultation with the servicing safety office, to the nearest OSHA area office, within 8 hours, by phone, letter, or fax, the following:*
 - (1) Any accident that is fatal to one or more employees.
 - (2) Any accident that results in in-patient hospitalization of three or more employees.

The requirement for reporting also applies to each fatality or hospitalization of three or more employees that occurs within 30 days of an accident.

The report to OSHA should relate the circumstances of the accident, the number of fatalities, and the extent of the injuries.

- c. To the appropriate union promptly:
 - (1) Any employee fatality.
 - (2) Any serious industrial, noncriminal accident or injury.

822.12 **Performance Cluster Manager Report to Area and Headquarters**

In the event of a fatality, amputation, mutilation, or OSHA reportable accident (see 822.11 b) performance cluster manager must, within 8 hours, report the accident by telecommunications (FAX/email) to the area Human Resources manager and Headquarters Safety Performance Management. The report must use the following format:

- a. Post office or facility — city, state and ZIP Code.
- b. Name, title, and phone number of installation head. State whether this official is personally acquainted with the situation.
- c. Brief description of accident including:
 - (1) Date and time of accident and/or death. Make a supplementary report if a death occurs after the initial report.
 - (2) Accident location.
 - (3) Name, Social Security number, home address, title, age, sex, years of service, and extent of injuries to postal employee(s).
 - (4) Name, age, sex, address, and extent of injuries to nonpostal persons involved.
 - (5) Type of work employee was performing when the accident occurred.
 - (6) Vehicle, equipment, or property damaged (postal or nonpostal). If vehicle, state the make, model, and type. State whether seat belt was used.
 - (7) Probable cause(s) of accident.
 - (8) Police charges, if any and if known.
 - (9) Name, title, and level of supervisor on duty.

822.2 **Investigating Serious Accidents**

822.21 **OSHA Investigations**

OSHA may elect to investigate occupational fatalities or serious accidents. If notified by OSHA that they intend to investigate such an accident, management must contact the Headquarters General Counsel and Safety Performance Management regarding proceeding with the internal investigation and cooperating with OSHA.

822.22 **Postal Serious Accident Investigation Board**

822.221 **Mandatory Composition**

A management board appointed by the performance cluster manager must investigate job-related fatalities and other serious accidents. **(Exception:** Some serious accidents involving customers or postal employees may not warrant a full investigation by a board. The vice president of Area Operations may waive a serious accident investigation if he/she determines that the purpose of such an investigation (see 822.223) is unlikely to be realized because of the circumstances of the accident. If the performance cluster manager believes a waiver is justified, he/she should request a waiver from the vice president of Area Operations. If a waiver is granted, it should be documented and the file treated in accordance with appropriate requirements of 822.225.) The board must be appointed within 24 hours of the accident and must include:

- a. One manager who has no functional relationship to the activity(ies) involved in the accident; this person will serve as chairperson.
- b. One manager from the office who has a functional relationship to the activity(ies) involved in the accident.
- c. The manager of Safety and Health, or designated safety specialist, as appropriate.
- d. One postal medical advisor appointed in consultation with the area medical director.

822.222 **Optional Composition**

One employee representative from the local safety and health committee, when requested by the appropriate union, will be permitted to accompany the board in its investigation of industrial, noncriminal accidents.

Safety Performance Management, Headquarters, may provide investigative assistance when such assistance is determined to be appropriate by the area Human Resources manager.

The vice president of Area Operations may designate, as deemed necessary, an area level representative to serve on or to provide consultation to the Board.

822.223 **Board Responsibilities**

Board responsibilities are to:

- a. Discover the causes of the accident.
- b. Make sound recommendations to prevent accident recurrence.
- c. Review the quality of action taken by supervisors where the accident occurred.

Note: Board responsibilities and actions do not relieve those immediately involved of their responsibility for accident investigation and prevention.

822.224 Board Investigation Report

The board uses the following report format for the board's findings and recommendations:

- a. Detailed description of accident.
 - (1) Employee's relationship (location) to physical surroundings.
 - (2) What the employee was doing when the accident occurred and how it was being done.
- b. Statements.
 - (1) Statement of employee.
 - (2) Statement of witness(es).
 - (3) Statement(s) of other person(s) interviewed.
- c. Pertinent findings.
 - (1) Whether the employee did, or failed to do, something that contributed to the accident. Include unsafe acts, violation of safety rules (such as not wearing a seat belt, see section 840, lack of knowledge, or lack of training).
 - (2) What others involved did, or failed to do, that contributed to the accident.
 - (3) The main reason behind what was done or failed to be done that contributed to the accident.
 - (4) Deficiencies and unsafe or adverse conditions in the work environment that contributed to the accident.
 - (5) If applicable, reason for the existence of the deficiencies in the work environment.
- d. Quality and type of action taken by management after the accident occurred.
 - (1) Immediate supervisor's investigation (see 821.2 for responsibilities).
 - (2) Upper level managers' actions (responsibilities include ensuring that all other employees involved in similar work are instructed, revising work procedures or practices when required, and ensuring that the board's recommendations are implemented when appropriate).
- e. Actions recommended by the board to prevent future occurrences of similar accidents.

822.225 Investigation Reporting and Response Requirements

Investigation reporting and response requirements are as follows:

- a. *Board.* Within 15 working days of appointment, the board must submit a report of its findings and recommendations to the district manager, with copies to the area vice president and the installation head.
- b. *Installation Head.* Within 10 working days after receiving the board's report, the installation head must provide a report to the district manager, with a copy to the area vice president, describing the corrective actions taken.

- c. *District.* The original copy of the investigation board report is retained at district Safety.

For fatal and catastrophic (e.g., OSHA reportable) incidents only, an executive summary must be forwarded to the area Human Resources manager. The summary should include at a minimum, the date and time of the incident, the name and location of the installation, personnel information, a brief description of the incident, causal factors, recommendations, and proposed corrective actions.

When the investigation board report of findings and recommendations indicates national impact items, a complete copy of the board report must be forwarded to the area Human Resources manager for review and consultation with any affected Headquarters departments.

- d. *Headquarters.* Upon written request of any member of the National Joint Labor-Management Safety and Health Committee, the vice president of Employee Resource Management must arrange for the release of a copy of the report to that member. However, those portions of the report prohibited from disclosure by law or regulation must not be released.

823 Program Evaluations

823.1 Purpose

The purpose of routine safety and health program evaluations is to measure the effectiveness of the Postal Service Safety and Health Program at each organizational level, ensure OSHA compliance, and promote an overall model for an effective safety and health program. A program evaluation must include compliance with and implementation of program elements included in this chapter, and other postal policy and procedural documents, including handbooks, manuals, and management instructions.

823.2 Responsibilities

823.21 Headquarters

Headquarters conducts safety and health program evaluations at various organizational levels when deemed appropriate.

823.22 Areas

Areas conduct safety and health program evaluations at various organizational levels when deemed appropriate or in response to OSHA compliance activity. Vice presidents of Area Operations review performance cluster safety and health program evaluations and monitor performance. In accordance with 810, these evaluations are to be considered in evaluating individual performance of managers in the area.

823.23 Performance Clusters

Performance clusters must conduct annual safety and health program evaluations in each plant. This evaluation may be in conjunction with the inspection conducted by the district or plant safety and health staff. They

must use the most recent Program Evaluation Guide contained in the Safety Toolkit. If a Headquarters- or area-sponsored program evaluation is conducted during the funding year, it fulfills the annual requirement. In addition, a performance cluster level program evaluation is to be conducted annually to review cluster commitment to effective program management as follows:

- a. In all installations with 100 or more workyears of employment in the regular workforce, safety and health program evaluations must be conducted by district and plant safety and health staff.
- b. In all installations with more than 50 and less than 100 workyears of employment in the regular workforce, safety and health program evaluations appropriate to size and complexity of the office will be conducted by collateral duty FSCs, with assistance as necessary from the servicing safety office.

823.3 **Program Evaluation Report**

823.31 **Installations Greater Than 100 Workyears of Employment**

A safety and health program evaluation report must be sent within 15 working days of the evaluation's completion to the installation head of the organization being evaluated. Within 30 days after receipt of the evaluation report, the installation head must address serious deficiencies in a response to the evaluators. Area vice presidents and PC managers will review these program evaluations, as appropriate, to ensure management commitment, involvement, and accountability in accordance with applicable ELM requirements.

823.32 **Installations Greater Than 50 and Less Than 100 Workyears of Employment**

The servicing safety office will review program evaluation reports, as appropriate, and help management implement an effective safety and health program.

824 **Safety and Health Inspections**

824.1 **Purpose**

The purposes of a safety and health inspection are to target specific operational, facility, or program deficiencies that may cause accidents, injuries, and illnesses, and to foster compliance with OSHA regulations and standards.

824.2 **Methods**

Safety personnel conducting inspections must be technically competent to recognize and evaluate hazards of the work environment and to suggest specific abatement procedures. They must use inspection checklists contained in the most current Safety Toolkit that reference current OSHA and other applicable regulations and standards and postal policies.

824.3 **Types of Inspections**

824.31 **Area Oversight and Targeted Inspections**

824.311 **Oversight**

The area Human Resources manager must ensure that safety and health inspections are conducted as required by this section.

824.312 **Area Inspections**

The area Human Resources function must conduct area inspections of plants or other installations as necessary to ensure effective safety and health programs. Inspection teams should consist of area and local safety and health personnel, maintenance, and line management.

The union representatives from the local safety and health committee may participate in inspections conducted by area safety and health personnel provided that the union represents employees at the facility being inspected. The number of union representatives will be determined by appropriate collective-bargaining agreements.

824.32 **PC Installations With One Hundred Workyears or More**

824.321 **Requirement**

District and plant safety personnel must conduct a semiannual inspection of all installations with 100 or more workyears of employment in the regular workforce. If Headquarters or the area conducts an inspection, it serves as one semiannual inspection.

824.322 **Teams**

Inspection teams consist of personnel from Safety, Maintenance, In-Plant Support, and line management.

The union representatives from the local safety and health committee may participate in inspections referred to in this section, provided that the union represents employees at the installation and provided that the union representative is domiciled at the installation to be inspected. If that union representative is not domiciled at the installation to be inspected, and if that union represents employees at the installation, (a) at the union's option, representatives from the committee may participate in the inspection at no additional cost to the employer; or (b) the union may designate a representative domiciled at the installation to be inspected to participate in the inspection. The number of union representatives is determined by appropriate collective bargaining agreements.

824.33 **PC Installations With Less Than One Hundred Workyears**

824.331 **Requirement**

Collateral duty facility safety coordinators (FSC) must conduct an annual inspection of each installation with less than 100 workyears of employment in the regular workforce. The FSC will conduct the inspection using instructions and an approved inspection checklist. District safety personnel provide technical assistance and support as necessary. In addition, district safety

personnel must visit facilities as necessary to verify results of inspections by the FSC and provide assistance.

824.332 **Teams**

Inspection teams consist of the collateral duty FSC and supervisors if available.

One union representative from the local safety and health committee, selected on a rotational basis by the unions, may participate in the annual inspection of each installation with less than 100 workyears of employment in the regular workforce where the committee exists in the installation being inspected. In those installations that do not have a safety and health committee, the inspectors afford the opportunity for a bargaining unit employee (from each union that represents employees in that installation) to accompany them during these inspections. If requested, these bargaining unit employees should be selected on a rotational basis by the various exclusive bargaining representatives in that installation. The number of union representatives is determined by appropriate collective bargaining agreements.

824.4 **Conduct of the Inspections**

824.41 **Authority**

Postal Service safety personnel are authorized:

- a. To conduct inspections without delay.
- b. To have access to all available information relevant to the occupational safety and health of the workplace to be inspected, including Form 1767, *Report of Hazard, Unsafe Condition, or Practice*; Form 1769, *Accident Report*; Form 1772, *Accident Log*; OSHA Log; OSHA citations or other correspondence; training records; and all checklist and deficiency reports.
- c. To interview employees privately, if necessary.
- d. To consult with a reasonable number of employees during the inspection if there are no authorized representatives of employees.
- e. To deny the right of accompaniment to any person whose participation interferes with a fair and orderly inspection.

824.42 **Inspection Procedures**

824.421 **Opening Conference**

Members of the inspection team must conduct an opening conference with the installation head and the union representatives who are to participate in the inspection. The purpose of this conference is to explain the purpose and scope of the inspection and to inform the installation head that the inspection team will, in the course of inspection, consult with employees and managers as the need occurs.

824.422 **Inspection Rules**

Safety inspections must be conducted according to the following rules:

- a. The responsible manager must ensure that the team, led by the senior safety professional (or collateral duty FSC) assigned, has adequate participation and resources to accomplish a meaningful inspection.
- b. Members of inspection teams must comply with all safety and health rules at each installation including the use of protective clothing and equipment. The conduct of inspections must not result in unreasonable disruption of operations.
- c. Representatives of Maintenance, In-Plant Support, Operations, and others designated by management as appropriate, must participate.
- d. During the course of an inspection, any employee must be afforded an opportunity to bring to the attention of the inspection team any unsafe or unhealthful working condition that the employee believes exists in the workplace. In order to speak with the head of the inspection team, employees must first request permission from their immediate supervisor. Such requests must not be unreasonably denied.
- e. Safety personnel must arrange for or conduct industrial hygiene evaluations and sampling and take photographs where necessary.

824.423 **Imminent Hazard Abatement**

If an imminent danger is identified, the inspector must immediately inform the official in charge of the workplace. The official in charge of the workplace must undertake immediate abatement of the dangerous condition and the withdrawal of employees who are not necessary for the abatement. If the official in charge needs assistance to undertake full abatement, he or she must immediately notify, through channels, the district manager, who provides assistance for the abatement effort. The area Human Resources manager is also to be notified.

Safety and health committees and union representatives of the employees affected must be informed of all relevant actions.

824.424 **Closing Conference**

At the conclusion of a scheduled inspection, safety personnel must confer with the installation head and the union representative(s) who accompanied the inspection team and advise them of deficiencies disclosed by the inspection. Anyone at the conference may bring to the inspector's attention any pertinent information regarding conditions in the workplace.

824.425 **Documentation and Reporting**

The team leader utilizes inspection checklists and reports to record results and track abatement actions and sends the report to the installation head of the facility inspected no later than 10 working days after the completion of the closing conference. In addition, the team leader sends copies of the report to the employee representative(s) who participated in the closing conference and/or the local safety and health committee.

824.426 Notification

Immediately upon receipt of the deficiency report the installation head must post, in a prominent place where it will be readily observed by employees, a notice that the inspection has been received and is available for viewing in a convenient location, e.g., the safety office. (If feasible the entire deficiency report should be posted.) The notice must indicate, as applicable, that deficiencies were found, any special procedures that are in place, and that abatement dates have been established. The notice shall remain in place for 3 working days or until all items have been abated, whichever is longer. Copies of all inspections and reports will be maintained at the local safety office and/or district safety office in accordance with established record schedules.

824.5 Deficiency and Hazard Abatement**824.51 Hazard Classifications**

Safety hazards are classified as follows:

- a. *Imminent danger* — a situation in which there is a reasonable certainty that a danger exists that could cause death or serious physical harm immediately or before the danger can be eliminated through normal abatement procedures.
- b. *Serious danger* — a situation in which there is a substantial probability that death or serious physical harm could result.
- c. *Nonserious danger* — a situation that does have a direct relationship to job safety and health but probably would not cause death or serious physical harm.

824.52 Hazard Abatement Committee

Within 5 working days after receipt of the inspection report, a hazard abatement committee must be established and meet to assign priorities and specific abatement dates within the limits set by the inspection team. The installation head must chair this committee. (**Note:** Postmasters or others who serve as *installation head* for detached units may designate a chair for those detached unit abatement committees only.) Committee members must include:

- a. Installation head (or designee as noted above).
- b. Safety representative (collateral duty FSC if appropriate).
- c. Maintenance representative.

Additionally, Mail Processing, Customer Services, Industrial Engineering, Purchasing, and other personnel must attend when their functional areas are involved.

824.53 **Abatement**

824.531 **Within 20 Days**

Where feasible, correct deficiencies within 20 days of receipt of the report.

824.532 **More Than 20 and Fewer Than 45 Days**

All deficiencies determined to require more than 20 days to correct must be reported immediately, along with an abatement plan, to the district manager. The abatement plan must contain the following:

- a. Name of installation.
- b. Location of unsafe condition.
- c. Description of unsafe condition.
- d. Length of time the condition has existed.
- e. Explanation of the circumstances of the delay in abatement.
- f. A management action plan (MAP) that will be used for resolution of the problem.
- g. A summary of steps being taken in the interim to protect employees from being injured by the unsafe or unhealthful working condition.

Affected employees must be informed of the provisions of the plan.

824.533 **More Than 45 Days**

All deficiencies determined to require more than 45 days to correct must be reported immediately, along with the abatement plan, through management channels to the vice president of Area Operations, with copies to the area Human Resources manager.

824.534 **Changes**

Once an abatement plan has been submitted, any changes in the abatement plan require the submission of a new plan in accordance with the provisions of this section.

824.535 **Submission of Abatement Record**

Within 5 days of abatement, a copy of the abatement record, signed by the installation head, must be sent to the safety professional in charge of the inspection.

When deficiency requires action by the General Services Administration or another federal lessor agency, the installation head must contact the lessor agency and request corrective action. This does not, however, relieve management from the obligation to protect employees.

824.54 **Reinspection and Followup**

The procedures for correcting a deficiency must include a process to check (through spot checks and reinspections as appropriate) whether the corrective action taken has proven to be effective.

Spotchecks and reinspections should be conducted by the same personnel (i.e., full-time or collateral duty facility FSC) who performed the original inspection. Posting of the follow-up inspection results is not required.

824.6 Investigating Employee Reports of Hazard, Unsafe Condition or Practice**824.61 Purpose of Form 1767, Report of Hazard, Unsafe Condition or Practice**

Form 1767, *Report of Hazard, Unsafe Condition, or Practice*, is designed to encourage employee participation in the Postal Service Safety and Health Program and to provide prompt action when employees report a hazard. This form provides a channel of communication between employees and management that promotes a prompt analysis and response with corrective action to reports of alleged hazards, unsafe conditions, or unsafe practices.

824.62 Availability of Form

Supervisors must maintain a supply of Forms 1767 in the workplace in a manner that provides employees with both easy and (if an employee so chooses) anonymous access.

824.63 Procedures and Responsibilities**824.631 Employee**

Any employee, or the representative of any employee, who believes that an unsafe or unhealthful condition exists in the workplace may do any or all of the following:

- a. File a report of the condition on Form 1767 with the immediate supervisor and request an inspection of the alleged condition.
- b. If the employee desires anonymity, file Form 1767 directly with the installation's safety personnel, who will immediately return the report to the employee's supervisor for necessary action. (In such cases, safety personnel must not disclose the name of the individual making the report.)
- c. Report alleged unsafe conditions to a steward, if one is available, who may then discuss the condition with the employee's supervisor.

Discrimination against an employee for reporting a safety and health hazard is unlawful.

824.632 Supervisor

The immediate supervisor must promptly (within the tour of duty):

- a. Investigate the alleged condition.
- b. Either initiate immediate corrective action or make appropriate recommendations.
- c. Record those actions or recommendations on Form 1767.
- d. Forward the original 1767 and one copy to the next appropriate level of management (approving official).
- e. Give the employee a copy signed by the supervisor as a receipt.
- f. Immediately forward the third copy to the safety office.

It is the supervisor's responsibility to monitor the status of the report at all times until the hazard is abated. If the hazard remains unabated longer than

7 calendar days, the supervisor must verbally inform the employee as to abatement status at the end of each 7-day interval.

824.633 **Approving Official**

The approving official (determined locally) must initiate action to eliminate or minimize the hazard. If this results in the submission of a work order, attach the original 1767 and forward, through channels, to the manager of Maintenance. If the approving official determines that there are no reasonable grounds to believe such a hazard exists, the employee must be so notified in writing within 15 calendar days. (Safety personnel must assist in this determination when requested.) If the hazard was abated through actions of the approving official, the employee must be so notified in writing, and the original 1767, with a statement of actions taken, must be forwarded to the safety office.

824.634 **Safety Personnel and Collateral Duty FSCs**

Safety personnel and FSCs must log and sequentially number all hazard reports received on Form 1773, *Report of Hazard Log*. Safety personnel and FSCs must also review all Forms 1767 for accuracy, completeness, and follow-up, as necessary. They must routinely provide status reports of 1773 logs at Executive and Joint Labor-Management Safety and Health Committee meetings.

824.635 **Maintenance**

Maintenance must notify the approving official when any Form 1767 maintenance-related work order has been completed.

824.636 **Installation Head**

Installation heads are responsible for responding promptly to reports of hazard and ensuring that line supervisors are diligent at correcting hazards. If it is determined on the basis of a hazard report that an imminent or serious danger exists, the installation head must take immediate corrective action.

825 **OSHA Inspections**

Reference Note:

For additional material concerning the subject matter found in 825, refer to:

- Handbook EL-802, *Executive's and Manager's Safety Compliance Guide*.
- OSHA publications summarized and referred to therein.

825.1 **Purpose**

The purpose of part 825 is to provide general guidance when compliance safety and health officers (CSHOs) or compliance safety and health officers industrial hygienists (CSHO-IHs) from the Occupational Safety and Health Administration (OSHA) conduct announced or unannounced inspections or investigations of postal facilities. All such inspectors are referred to as CSHOs in part 825.

825.2 Scope

These procedures apply to all facilities in which postal employees work. In postal-owned or -leased facilities, it is the responsibility of the Postal Service to ensure compliance with OSHA requirements. In leased facilities this responsibility continues to exist regardless of lease arrangements.

825.3 Authority

It is Postal Service policy to maintain safe and healthful working conditions and to cooperate fully with OSHA inspectors. Also, as an employer subject to private sector enforcement, it is also Postal Service policy to ensure that inspections are conducted in a reasonable manner.

825.4 Procedures**825.41 Arrival of Inspectors and Verification of Credentials**

OSHA may conduct its inspections without prior notice. CSHOs generally conduct inspections during normal working hours, but may arrive on any tour. On arrival at a postal facility, the CSHO should ask to meet with the ranking postal official. The senior postal official must meet promptly with the CSHO.

The senior postal official, or designee, is to review all CSHOs' credentials and may request verification from the OSHA area office.

Once the CSHO has presented appropriate credentials, the senior postal official is to immediately notify, via telephone or in person, the district manager and area Human Resources manager (or their designees) of OSHA's presence and the scope of the inspection and request that a safety professional come to the facility immediately for the inspection.

825.42 Consent to Entry and Cooperation

The CSHO must be informed that he or she will be permitted to enter any postal facility for inspection or investigation purposes without delay once a safety representative reaches the site or area, or once the area Human Resources manager or designee agrees that the inspection may proceed without such attendance.

The CSHO should be informed that a request for such a representative has been made, that the Postal Service position is not intended to delay or interfere with the inspection, but rather to ensure that the Postal Service participates in a professional manner, and that the presence of the representative ultimately will expedite the completion of the inspection. Postal officials are to cooperate fully with OSHA CSHOs.

If, during an inspection, the postal official determines that the CSHO may believe that a violation exists because the CSHO does not have complete information about a particular condition, subject to the advice of the safety professional, the postal official should attempt to make the CSHO aware of all relevant additional information.

825.43 **Opening Conference**

825.431 **Initiation**

The CSHO holds an opening conference to inform the Postal Service of the purpose, scope, and conduct of the inspection. If the CSHO does not offer to conduct the conference, one should be requested.

825.432 **Attendance**

The opening conference must be attended by a safety professional unless the district Human Resources manager or designee says to proceed. The senior postal official attends the opening conference and may invite other postal officials from the facility, as appropriate. Employee representatives also should attend the opening conference; union representatives from the local safety and health committee should participate in accordance with 825.3 and 824.3.

825.433 **Provision of Materials**

The CSHO may provide copies of laws, standards, regulations, and promotional materials. The CSHO is required to furnish to the installation head any copy of an employee's report(s) of unsafe or unhealthful conditions that generated the inspection. If a complainant has asked to remain anonymous, OSHA is bound by regulations to respect that request. In such instances, the CSHO must still provide a list of the unsafe conditions alleged.

825.434 **Outline of Scope**

The CSHO can be expected to outline the proposed general scope of the inspection, including employee interviews, physical inspection of the workplace, records review, and the taking of photographs or samples.

825.435 **Plan of Route Sequence**

The CSHO should be questioned during the opening conference so that the walk-around inspection can be planned as to route sequence, notifications to production supervisors, technical support, etc. Planning of a route sequence should be considered a guideline only, as the CSHO may investigate any other apparent hazards observed in plain view en route to a particular area.

825.44 **Records Review**

825.441 **Safety Records**

It is the policy of the Postal Service to require that the CSHO present all requests for documents in writing to the person designated by the Postal Service as the one at the facility to receive such requests during the inspection. It is also postal policy to respond as quickly as possible to such requests. The CSHO is authorized to review all records that are required to be maintained under the OSH Act. Examples of the types of records that can be reviewed include the OSHA log and summary and Form 1769, *Accident Report*, when it is used to record injuries and illnesses.

825.442 **Medical Records**

In certain instances, the CSHO may ask to review the medical records of some employees in order to verify compliance with the medical surveillance record-keeping requirement of an OSH standard. Access to medical records must be coordinated through the senior area medical director.

If the CSHO wishes to record or copy any medical records, a written access order in the form set forth in the OSHA *Field Information Reference Manual* (FIRM) must be provided.

825.45 **Participation**

825.451 **Management Participation During Inspections**

The safety professional, or designee, must accompany the CSHO during the walk-around portion of the inspection. Collateral duty FSC should also participate in the inspection. Representatives of Operations, In-Plant Support, and Maintenance are to be with the CSHO, whenever possible.

Management representatives, including managers and supervisors, must not sign any statements, affidavits, or notes.

825.452 **Interviews of Management and Supervisory Personnel**

It is the policy of the Postal Service:

- a. To cooperate with requests the CSHO may make for interviews with representatives of management, including supervisors and staff. Management should work with the CSHO to schedule such interviews so as not to interfere with mail processing. Subject to this consideration, management employees should be made available for interviews as soon as reasonably possible.
- b. To have a representative of the Postal Service present for the entire interview. The representative may be an employee from Human Resources or Safety, a counsel, or a senior official or his or her designee.
- c. Not to consent to the audio or video taping or other recording of interviews with representatives of management. The only exception is if OSHA issues an investigatory subpoena requiring a witness to appear for a formal, sworn, recorded interview. In such cases, the representative of management must be represented by counsel.
- d. Not to allow representatives of management to sign statements, affidavits, notes, or other documents prepared by OSHA during interviews.

825.453 **Employee Participation During Inspections**

Union representatives from the local safety and health committee must be given the opportunity, in accordance with 824.3, to accompany CSHOs during inspections.

CSHOs also may consult with other nonsupervisory employees who are not part of the inspection team and may request to interview them in private or with their union representatives during the walk-around. The CSHO may be permitted to talk with employees at their workstations for no more than 5 minutes. If further conversation is desired, the Postal Service walk-around representative should offer to make the employee available for a scheduled interview by the CSHO. Management should work with the CSHO to schedule such interviews so as not to interfere with production. Subject to this consideration, employees should be made available for interviews as soon as reasonably possible.

Employee representatives are on the clock whenever the inspection is conducted during the employee's regular work schedule. Employees are not compensated for time spent accompanying CSHOs outside of their work schedule.

825.46 **Methods**

825.461 **Walk-Around Inspection**

There are several types of inspections (see Handbook EL-802) that may involve detailed inspection of all areas and a thorough records review.

Normally, in an inspection triggered by a complaint, the CSHO limits the inspection to the items listed in the employee's report. The scope of the inspection may, however, extend to other areas of the postal installation. During the walk-around inspection, the CSHO examines each item mentioned in the employee's report.

The CSHO may take photographs of or videotape any conditions observed. The Postal Service must duplicate as closely as possible each photograph or videotape taken by the CSHO and should specify in the detailed notes what each photograph shows. If necessary, as a less preferred but acceptable alternative, before the inspection begins, a written agreement may be reached with the CSHO that at the conclusion of the inspection, OSHA will promptly provide the Postal Service with copies of all the photos or videotapes that it has taken of the observed conditions.

The CSHO may use measuring devices or instruments to determine compliance with the OSH Act. The safety professional or designee must record the type of instrument used and the readings obtained, and take duplicate measurements using Postal Service instruments.

The CSHO can dismiss from the inspection team, at any time, anyone interfering with the orderly conduct of the inspection. If a management representative is dismissed, the occurrence must be thoroughly documented. Another management representative must be immediately named to complete the inspection.

825.462 **Health Sampling**

In order to determine whether a violation of health standards exists, the CSHO may collect samples, including full-shift (8-hour tour) sampling. Such sampling may require the wearing of sampling devices by employees. Postal officials are to cooperate with the CSHO and are to encourage cooperation by employees.

If the CSHO desires to conduct such monitoring, the Postal Service representative must request a delay until the Postal Service brings to the site an industrial hygienist or other person qualified to perform parallel monitoring. When such requests are made, the senior postal official must immediately notify the district manager, area human resources analyst, and district Safety and Health manager by phone. Every effort is to be made for the Postal Service hygienist to reach the site as soon as possible.

When OSHA conducts health sampling, the Postal Service is to take duplicate samples and send the samples to an accredited laboratory for

analysis. Proper chain-of-custody procedures established by the laboratory must be followed. Sample results must be retained locally and transmitted to the district Safety and area Human Resources.

825.47 **Immediate Correction of Imminent Dangers or Other Violations**

During an inspection, a CSHO may point out conditions that may be considered to be imminent dangers under the OSH Act. Immediate efforts are to be made to evaluate the condition. If it appears that such a danger is present, the corrections are to be made immediately, if possible, or the exposed employees removed from the zone of danger. Whenever feasible, also correct other potential violations or hazards pointed out by the CSHO during the visit.

825.48 **Closing Conference**

After completing the review of records, employee interviews (if necessary), and the walk-around inspection, the CSHO ordinarily will conduct an exit conference with the senior postal official and other team members. If the CSHO does not offer to conduct the conference, one should be requested. If the postal installation has a full-time safety professional, that person must also attend this closing conference. If any safety professionals have been called in from a plant or district, they must also attend the closing conference along with the collateral duty FSC. Employee representatives from the walk-around inspection must also attend.

During this conference, all conditions or practices that the CSHO believes may constitute a safety or health violation(s) should be reviewed. Efforts should be made to have the CSHO explain in as much detail as possible what violations he or she believes have been observed, and what citations, if any, he or she intends to recommend for issuance to the area director.

825.49 **Post Conference Internal Communications**

Following the closing conference, the senior postal official must immediately notify the area vice president that the inspection has been completed.

It is policy and direction of the General Counsel that following the closing conference, the installation head must prepare a memorandum for and directed to the General Counsel summarizing OSHA's findings and any other pertinent information concerning the inspection. This report is to be considered privileged and confidential as attorney-client communications and attorney-work product. The report is to be prepared and transmitted to the servicing area General Counsel within 48 hours of the closing conference. Copies of the report are to be sent only to the area Human Resources manager and the manager of Safety Performance Management at Headquarters. No other copies are to be distributed.

825.5 **Citations**

825.51 **Issuance and Posting**

Following an inspection, if violations have been observed, OSHA may issue citations alleging violations and stating a proposed penalty and proposed abatement date (OSHA Form 2).

Upon receipt of a citation, notify area and Headquarters General Counsel and Safety Performance Management. A copy is to be faxed immediately to Safety Performance Management, Headquarters, and the vice president of Area Operations. The citations must be forwarded to the district Safety and Health manager immediately (COB that day) and entered into the national citation management tracking system by area-designated persons, who will update each entry promptly until the citation is resolved and closed.

In accord with the instructions that accompany the citations, copies of the citations are to be posted in the affected facility at the locations where important announcements are customarily posted for employees. The citations are to remain posted until they are finally resolved.

825.52 **Abatement**

A citation includes a proposed date by which each alleged violative condition is to be corrected. The length of the period allowed varies based on the type of hazard involved, the severity of the risk to employees, and OSHA's assessment of the difficulty of correcting the hazard.

It is the policy of the Postal Service to abate violative conditions promptly. Whether a condition constitutes a violation, and whether a proposed penalty, abatement date, and means of abatement are reasonable, however, are matters to be resolved with OSHA once the citation has been reviewed by Headquarters Safety Performance Management and the Headquarters General Counsel.

825.53 **Informal Conference**

To assist in determining whether to contest or resolve a citation, the installation head (in concert with the Headquarters, area, and district safety representatives) must request an informal conference with the OSHA area director who issued the citation. Informal conferences are managed by area or Headquarters Safety Performance Management, and attended by field legal counsel or Headquarters legal counsel as deemed appropriate by Headquarters.

825.54 **Citation Management**

Citations must be managed in accordance with instructions from the Headquarters General Counsel and Safety Performance Management. (See Handbook EL-802 and OSHA publications therein concerning citations and required actions.)

825.6 Performance Cluster File of OSHA Inspections

The performance cluster file of OSHA inspections is the official record of OSHA compliance activity. However, the citation management tracking system must be kept current both to assist in tracking and management of citations, and provide a database of OSHA compliance activity nationally.

The district Human Resources manager, or designee, is to maintain a file on each OSHA inspection. The file is to include the following:

- a. A copy of any employee complaint letter or list of complaint items if the complainant wished to remain anonymous.
- b. Any citations (OSHA 2) and accompanying materials.
- c. The names of all CSHOs, management officials, and employees' representatives participating in the inspection.
- d. Notes and other documentation, such as photographs, made by local management.
- e. All correspondence relative to correction of hazards, abatement plans, and procedures, and documentation submitted to OSHA.
- f. Document log, if documents were provided to the CSHO.

830 Motor Vehicle and Industrial Safety

831 Motor Vehicle Safety

831.1 Objective

The objective of the Motor Vehicle Safety Program is to comply with applicable Department of Transportation regulations and to encourage safe driving to reduce the amount of property damage and human suffering caused by vehicle accidents while maintaining an efficient delivery and collection system.

831.2 Vehicle Maintenance

All installation heads having motor vehicles under their control must develop and administer controls necessary to ensure that the provisions outlined in Handbook PO-701, *Fleet Management*, are followed.

831.3 Driver Selection, Training, and Supervision

831.31 Driver Selection

Postal personnel responsible for hiring, road testing, supervising, and providing medical services must ensure that only qualified applicants are hired and/or retained for driving positions. The determination of "qualified" must be based on:

- a. Past driving record.
- b. The ability to avoid accidents, traffic violations, vehicle abuse, schedule delays, and discourtesy.
- c. Physical fitness as outlined in Handbook EL-806, *Health and Medical Service*.
- d. Requirements specified in TD 087-Course Number 43513-00.

831.32 Driver Training

Initial driver training, periodic driver improvement training, and special emphasis training must be designed and implemented to develop and maintain a professional, defensive driving workforce. (Defensive driving is defined by the National Safety Council as "driving to prevent accidents in spite of the incorrect actions of others and adverse conditions.") Such training must regularly be reinforced by the first-line supervisor. The careful selection of personnel to act as driving instructors is essential to ensure proper attitude, enthusiasm, interest, and understanding of the subject matter.

831.33 Driver Supervision

831.331 Supervisory Responsibility

Special responsibility for safe motor vehicle operations, as outlined in Handbook EL-801, *Supervisor's Safety Handbook*; Handbook PO-701, *Fleet Management*; and Handbook EL-814, *Postal Employee's Guide to Safety*, must be followed. To enforce a high standard of professional driving

performance, supervisors must complete Form 4584, *Observation of Driving Practices*, for each driver under their direct supervision at least semiannually and at other times deemed appropriate, including at 30, 60, and 80 days for probationary drivers. Supervisors must familiarize themselves with defensive driving techniques so that they know what the common driving errors are, how they can be detected, and how they can be prevented.

831.332 **Driver Responsibility**

Drivers must obey all traffic laws and postal policies, drive defensively and professionally, and extend courtesy in all situations. Specific driving responsibilities are outlined in Handbook PO-701, *Fleet Management*, in Handbook EL-801, *Supervisor's Safety Handbook*, and in Handbook EL-814, *Employee Guide to Safety*.

831.4 **Accident Analysis**

Managers and supervisors must analyze accident data to determine the hazards of vehicle operations and the primary causes of vehicle accidents and develop special action plans to reduce or eliminate them.

832 **Powered Industrial Truck Safety**

Employees authorized to operate powered industrial trucks (PITs) must be provided operator training in accordance with OSHA standard 1910.178, Powered Industrial Trucks, utilizing Course 52503, Powered Industrial Trucks Training. Before operating PITs, employees must be evaluated and certified. They must follow the operating rules and regulations outlined in Handbooks EL-801 and 814 and/or the manufacturer's operating instructions.

833 **Safety and Health in Design, Procurement, and Construction**

833.1 **Standards, Ergonomics, and Engineering**

OSHA and applicable consensus safety and health standards, ergonomic considerations, and sound safety and fire protection engineering techniques must be used to plan, build, design, construct, modify, repair, and procure new equipment, vehicles, and facilities. Consideration must be given to employee work environment, equipment, tools, supplies used, and the material on which work is performed.

Purchasing, delivery, and engineering personnel must consult safety personnel to ensure that safety engineering, health protection, and ergonomic considerations are integrated into all activities of the Postal Service.

Managers responsible for purchasing, design, and construction are accountable for compliance with OSHA standards and applicable fire protection and building codes.

833.2 **Supplemental Standards**

When deemed necessary, the Postal Service may adopt more stringent, alternate, or supplemental standards. Alternate or supplemental OSHA standards must be approved by the Secretary of Labor. Safety Performance Management, Headquarters, must coordinate all such requests with the Department of Labor.

833.3 **Supplier (Contractor) Safety**

Installation heads, purchasing, contracting officers, and other managers are responsible and accountable for ensuring that all suppliers (contractors) working on postal property follow OSHA regulations and postal safety and health policies. All suppliers must conform to OSHA regulations, and a postal representative is to be assigned to monitor supplier activities as appropriate, including coordinating with supplier safety "competent persons" and/or safety representatives. Supplier evaluation and selection must include a supplier's safety and health record, written programs, training, and OSHA compliance activity as appropriate to the scope of the contracted work, in accordance with existing purchasing policy.

This page intentionally left blank

840 Safety Awareness Programs

841 Program Promotion

841.1 Objectives

The purpose of the Safety Awareness Program is to promote interest, increase safety awareness, and gain acceptance of safe work practices. The aim is to secure maximum employee participation through the effective use of media and individual or group recognition. The cooperation of the local safety and health committee in the promotion of safety is to be encouraged.

841.2 Local Needs

Effective promotional programs must be based on a thorough study of local needs. Accurate planning and analysis are essential to achieve program objectives.

841.3 Media

Districts, plants, and other installations should procure or develop and distribute posters, publications, films, bulletins, pamphlets, newsletters, displays, etc., based on current and projected accident trends. The display of safety posters distributed by Headquarters must be kept current. Budgeting for safety promotional needs must be included in program planning.

842 National Safety Awards and Contests

842.1 Participation

All eligible installations must participate in the National Safety Council's Safe Driver Award Program. Additionally, all eligible installations should participate in:

- a. The National Safety Council's National Fleet Safety Contest.
- b. The National Safety Council's Injury Prevention Contest

842.2 Safe Driver Award Program

842.21 Recognition

The National Safety Council Safe Driver Award is the recognized trademark of professional drivers who have proved their skill in avoiding traffic accidents.

842.22 Performance

The award plan is more than a means of rewarding drivers with good safety records. The guidelines in the National Safety Council Safe Driver Award Rules establish what is expected of professional drivers in the way of safety performance: the ability to operate a motor vehicle without having a preventable (by National Safety Council definition) accident.

These guidelines constitute a yardstick by which drivers can measure their own performance and by which supervisors can measure the performance of individual drivers. When this standard of performance is clearly understood by both drivers and supervisors, it becomes a logical, fair, and workable basis for effective safety supervision. These rules are not intended as the yardstick of disciplinary action.

842.23 **Participation**

Postal installations having one or more postal employees operating postal-owned, hired, leased, contract, or private vehicles in conducting postal business must participate in the Safe Driver Award Program. All postal personnel operating motor vehicles on official business are eligible to participate in the Safe Driver Award Program under the rules for administering the National Safety Council's Safe Driver Award Plan (Postal Service edition). Contractors, contract personnel, supervisors, and personnel who drive sporadically or only during seasonal periods, holidays, vacations, etc., are excluded.

842.24 **Preventability**

After a vehicle accident, a determination must be made by a designated postal official or the Safe Driver Award Committee as to whether the accident was considered preventable for the purpose of evaluating eligibility for the National Safety Council Safe Driver Award.

842.25 **Safe Driver Award Rules**

For details on administering the National Safety Council's Safe Driver Award Program, see the latest Postal Service version of Safe Driver Award Rules.

842.26 **Privacy Act Considerations**

Safe driver award records contain information about individuals. As such, they may be handled and disclosed only in accordance with the Privacy Act and its implementing instructions. An individual's award records and related correspondence are maintained within the Postal Service as the privacy system entitled USPS 120.170, Personnel Records — Safe Driver Award Records.

843 **Safety Incentive Programs**

843.1 **Concept**

Safe working conditions and appropriate safety equipment are not always enough to prevent on-the-job injuries. Effective safety programs also need employee participation, team effort, and sustained safety consciousness. Safety incentive programs can motivate employee involvement and safety consciousness through awards or contests that incorporate the use of recognition and rewards. Incentive programs must not be used to encourage nonreporting of accidents, injuries, or illness. Individual safety contests, awards, and incentive programs must be approved before implementation, in accordance with 620, Contests.

843.2 **Selected Programs**

Increased safety incentive may be accomplished with programs that recognize driver-of-the-month or -year, safety-captain-of-the-month or -year, best safety slogan, fewest violations during safety inspections, demonstrated safety consciousness, best accident record, million-mile awards, etc. Creative development of new and interesting programs designed to capture and stimulate interest should be encouraged. Sharing of ideas through cooperative exchange with other agencies or local private industry is encouraged.

843.3 **Administration**

The installation head or designee conducts, controls, and is responsible for approved driver and industrial safety incentive programs (see 620 for implementation procedures).

843.4 **Presentation Ceremonies**

Installation heads must provide publicity and an appropriate ceremony for each incentive award.

844 **Seatbelt Use Incentive**

844.1 **Policy**

\$10,000 will be paid to the estate of any postal employee who, while in a pay-duty status, sustains fatal injuries as the result of a job-related motor vehicle accident, provided he or she is wearing the lap belt and shoulder belt when required and is not in violation of the traffic laws and postal policy at the time of the accident.

844.2 **Determination**

It is the responsibility of the investigation board, as described in 823.4, to determine and document whether or not an employee was wearing a seat belt at the time of the accident and that no traffic law was being violated by the postal driver. Such determinations are based on, but not limited to, postal and/or police accident investigative reports, autopsy reports, and/or interviews with witnesses, ambulance attendants, police, or attending medical and hospital personnel. For purposes of this incentive program, where a determination and documentation cannot be made or is conflicting, it will be assumed that the employee was wearing a seat belt and was in compliance with the law.

844.3 **Payment**

Upon receipt of the board's final investigative report, the area vice president notifies the area Human Resources manager, via memorandum, that payment should be made to the employee's estate. Included with the memorandum is a copy of the board's investigative report summary. The area Human Resources manager requests payment from the Eagan Accounting Service Center and transmits the check to the division manager for

disbursement to the employee's estate. A copy of the request for payment is to be forwarded to Safety Performance Management, Headquarters, and is part of the serious accident file.

850 Emergency Action Plans and Fire Prevention and Control

851 General Responsibilities

851.1 Installation Heads

Installation heads are responsible for implementing emergency action plans and a fire safety program for the protection of people, mail, and postal property. This program must include (but is not limited to) training, education, inspection, enforcement, drills, emergency evacuation teams, written emergency action plans, written standard operating procedures for hazardous materials spills and leaks, and fire prevention plans as required in this subchapter and in accordance with 29 CFR 1910, Subpart L.

851.2 Managers

Managers and supervisors must be constantly on the alert for fire hazards or other emergency situations and take immediate corrective action for any unsafe practice or condition. If immediate corrective measures are beyond their capabilities, managers must take short-term precautions to ensure the safety of employees and the protection of the workplace. Conditions that cannot be corrected immediately must be reported to a higher authority for corrective action. Managers must ensure that marked aisles and exits are maintained and clear and that all employees are trained in the evacuation and emergency procedures of the installation, including building emergency alarm systems. Supervisors or managers are responsible for ensuring that personal protective equipment is available to employees who respond to spills and breakage involving hazardous materials.

852 Emergency Action Plan

852.1 Responsibility

Each postal facility having more than 10 employees on the rolls must maintain an emergency action plan in writing. If there are 10 or fewer employees, the plan may be communicated verbally. Safety personnel/ collateral duty FSC may provide advice and technical assistance, where needed, in the development of such plans. The plan must include designated actions that management and employees are to take to ensure the safety of employees and the protection of property from fire and other emergencies, e.g., tornadoes, earthquakes, hazardous materials (hazmat) spills. (See Management Instruction EL-810-96-1, *Hazardous Materials and Emergency Response*, for establishment of standard operating procedures for spills and leaks and the relationship to Emergency Action Plans.)

852.2 Content

Include the following elements, as a minimum, in the emergency action plan:

- a. Emergency escape procedures, graphic illustrations of emergency escape route assignments, shelters, and location of fire alarms and extinguishers.
- b. Specific procedures to be followed by employees who remain to operate or shut down critical building systems before they evacuate.
- c. Procedures to account for all employees after emergency evacuation has been completed.
- d. Details of any special assignments.
- e. The preferred means of reporting fires and other emergencies based on local procedures and requirements.
- f. Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.

852.3 Posting

Post parts (a) and (f) of this plan in a prominent location.

853 Emergency Evacuation Teams and Drills**853.1 Emergency Evacuation Teams****853.11 Organization**

In installations having 10,000 square feet or more, an emergency evacuation team (EET) of postal employees must be maintained on each work tour. EETs may be maintained in smaller installations when warranted by the type of operations conducted. All postal installations having an organized EET must prepare and maintain a written policy statement that establishes the existence of the EET; its basic organizational structure; the type, amount, and frequency of training to be provided EET members; the expected number of members in the EET; and the functions that the EET is to perform at the facility. This statement may be a part of the fire prevention plan.

853.12 Size

The size of the EET depends on the amount of fire-extinguishing and control equipment, the number of exits, and the number of employees on duty. A prearranged schedule must be developed to ensure the availability of the EET.

853.13 Duties of EETs

The organizational statement must clearly indicate that at no time will postal EETs stand and fight any fire beyond the incipient stage, or respond to hazardous materials emergencies. For Postal Service purposes, an incipient fire is one in the initial or beginning stages that can be controlled, contained, or extinguished by portable fire extinguishers without the need for personal

protective clothing or self-contained breathing apparatus (SCBA). The use of SCBA requires a higher level of skill and training not usually expected of postal employees. Other duties of the EETs include, but are not limited to:

- a. Stopping conveyor belts.
- b. Closing doors to rooms and covers at dump holes and conveyor openings.
- c. Directing the fire department to location of fire.
- d. Evacuating injured and handicapped personnel.
- e. Inspecting the fire site with the fire department to determine that the fire is completely extinguished and that no possibility of rekindling exists.
- f. Moving vans from loading docks.
- g. Shutting down all electrical power to the building or sections as directed by the municipal fire department.
- h. Maintaining perimeter security to prevent reentry until officially instructed to permit it.
- i. Procedures to account for all employees after emergency evacuation has been completed.
- j. Assisting the fire department in maintaining crowd control.

853.14 **Membership**

Building maintenance employees and security personnel should form the nucleus of the EET. Additional personnel may be assigned to assure adequate coverage on all tours. The assigned members are:

- a. *EET Leader.* The installation head is responsible for appointing the EET leader, who should normally be the superintendent for building maintenance or someone in a similar position. The EET leader must establish a procedure to provide quarterly review of the program to ensure operational efficiency.
- b. *Assistant EET Leader.* The EET leader appoints an assistant EET leader.
- c. *EET Members.* EET members are appointed as needed to cover all tours, with an alternate for each member. The alternate should have different off days than the regular member. The EET leader ensures that all persons selected as members of the EET are physically capable of performing the duties that may be assigned to them during training or actual emergencies. Employees with known heart disease, epilepsy, or chronic obstructive pulmonary diseases must not be permitted to participate in any EET activity unless they present a certificate of fitness from their personal physician stating that they are physically capable of performing such duties. Employees with physical disabilities are permitted to be EET members; however, their job assignments must be governed by their ability to perform specific tasks.

853.15 **Training**

Members are required to complete an initial basic level of training and annual refresher training. Such training and education must be provided to members

and alternates before they are expected to perform any EET emergency evacuation team activity. To the extent feasible, Safety and fire department personnel should assist in the establishment and training of the EET. EET leaders and training instructors must be provided training and education that is more comprehensive than that provided to the general membership of the EET. Such training may be available from state firefighting academies and local fire departments. Training for all members must be on the clock and must cover:

- a. Teamwork coordination.
- b. Specific EET duties for each member and alternate.
- c. Familiarization with all fire-extinguishing equipment.
- d. Fire alarm systems and fire and other emergency reporting.
- e. Classifications of fires and the equipment used on each.
- f. Stopping fire along conveyor belts and between work levels.
- g. First aid and rescue procedures.
- h. Conducting EET drills. (EET drills must be conducted at least annually to assure efficiency.)
- i. The facility Hazmat SOP (First Responder Awareness Level).
- j. Special situations, e.g., tornado sheltering, earthquakes, where applicable.

853.16 **Exposure**

At no time should EET members or alternates perform a task that exceeds their level of skill, ability, or training, or expose themselves or other employees to unnecessary dangers and risks, including hazardous materials emergencies.

853.17 **Special Hazards**

The EET leader must inform EET members and alternates about special hazards such as storage and use of flammable liquids and gases, toxic chemicals, radioactive sources, and water reactive substances to which they may be exposed during fire or other emergencies. The EET members also must be advised of any changes that occur in relation to the special hazards. The EET leader must develop and make available for inspection by EET members written procedures that describe the actions to be taken in situations involving the special hazards and must include these in the training and education program (see facility written hazard communication program).

853.18 **Installations Without EETs (Less Than 10,000 Square Feet)**

In installations that do not have EETs, the installation head is responsible for ensuring that supervisors or employees are assigned the following functions in case of fire or other emergency:

- a. Notification of fire department, police, ambulance, or other emergency services.
- b. Prompt evacuation of personnel including injured or handicapped employees.

- c. Procedures to account for all employees after emergency evacuation has been completed.
- d. Security of mail, monies, receipts, and accountable and valuable papers.
- e. Use of fire extinguishers.

853.2 **Drills**

At least one emergency evacuation must be conducted annually on each work tour. Sheltering drills are appropriate in locations prone to tornadoes or earthquakes. The importance of fire drill training must be impressed upon all postal employees. In conducting fire drills, the following objectives must be met:

- a. Sounding of alarms and prompt notification of fire department, police, or other emergency services.
- b. Orderly evacuation in minimum time.
- c. Security of mail, monies, receipts, and valuable papers.
- d. Emergency plan assignments by designated EET members and alternates.

854 **Fire Prevention Plan**

854.1 **Responsibility**

Each installation head managing a postal facility with more than 10,000 square feet must maintain a written fire prevention plan. Installation heads managing smaller facilities may maintain written fire prevention plans when warranted by the type of operations conducted. Safety personnel/collateral duty FSC may provide advice and technical assistance, where needed, in the development of such plans.

854.2 **Content**

Include the following elements, as a minimum, in the fire prevention plan:

- a. A list of the significant, potential workplace fire hazards; handling, storage, and control procedures; potential ignition sources (such as welding, electrical equipment, and heaters); and the type of fire protection equipment or system present that can contain, extinguish, or control fires.
- b. Names or regular job titles of personnel responsible for maintenance of equipment installed to prevent or control fires.
- c. Names or regular job titles of personnel responsible for control of fuel-source hazards.
- d. Procedures to be used to control the accumulation of flammable and combustible waste materials and waste residues so that they do not contribute to a fire emergency.

854.3 Employee Training**854.31 General**

Employees must be instructed at least annually, and any time there is a change in the plan or their role, by their immediate supervisor in:

- a. The evacuation and emergency procedures of the installation.
- b. The use of fire-extinguishing equipment. Employees whose work station is in, or adjacent to, high-hazard operations must be trained in the use of appropriate fire-extinguishing equipment for that specific operation.
- c. Good housekeeping practices.
- d. The observance of smoking rules.
- e. Hazmat SOPs using Handbook EL-812, *Hazardous Materials and Spill Response*.

854.32 Training for the Emergency Action Plan and Fire Prevention Plan**854.321 Emergency Action Plan**

To maintain the emergency action plan, a sufficient number of employees must be designated and trained to assist in the execution of a safe and orderly emergency evacuation, and dealing with incidental and emergency releases of hazardous materials in the mails and elsewhere. See MI EL-810-96-1, *Response to Hazardous Materials Releases*. This pool of employees must be kept current.

854.322 Fire Prevention Plan

To maintain the fire prevention plan, the immediate supervisor must inform all employees of the fire hazards in the work area to which they may be exposed.

854.323 Orientation

The immediate supervisor must orient all newly assigned employees to those parts of the plans that the employees must know to protect themselves in the event of an emergency.

854.324 Review

The written plans must be kept at the workplace and be made available for employee review. The emergency action and fire prevention plans must be reviewed with each employee of the installation:

- a. Annually.
- b. Whenever there is a change in employee responsibilities or designated actions under the plans.
- c. Whenever the plans are revised.

855 **Fire Inspections**

855.1 **Responsibility**

Managers and supervisors that have been trained by safety and/or fire protection personnel must conduct fire inspections. Training must include the conduct of inspections, identification of unsafe practices causing fires, and the methods of eliminating or correcting hazards. The installation head is encouraged to seek assistance from local fire officials and permit them to conduct fire inspections and prefire planning programs.

855.2 **Frequency**

Fire inspections must be conducted in all postal-owned and postal-leased installations. Semi-annual inspections are required in all installations with less than 100 workyears of employment in the regular workforce. Quarterly fire inspections are required in all installations with more than 100 workyears of employment in the regular workforce and VMFs.

855.3 **Procedures**

Fire inspections may be scheduled to coincide with semiannual or annual safety inspections. They must be documented using fire inspection checklists available in the Safety Toolkit and published periodically.

855.4 **Corrective Action**

Deficiencies identified in safety checklists must be reviewed by the hazard abatement committee and corrected.

Local authorities must be notified immediately upon discovery of fire hazards that are not under postal jurisdiction, but that affect postal personnel, mail, or property.

856 **Alarm Systems and Extinguishers**

856.1 **Alarm Systems**

Every postal facility must have an established employee alarm system that complies with OSHA Standard 29 CFR 1910.165 and that includes:

- a. Procedures for informing each employee of the preferred means of reporting emergencies, such as manual pull-box alarms, horns, public address systems, radio, or telephones. The installation head must have emergency telephone numbers posted near telephones, on employee bulletin boards, and at other conspicuous locations where telephones serve as a means of reporting emergencies. Where a communication system also serves as the employee alarm system, all emergency messages must have priority over all nonemergency messages.
- b. Procedures for sounding emergency alarms in the workplace. For those installations with ten or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding

the alarm provided all employees can hear the alarm. Such workplaces need not have a backup system. An alarm device must:

- (1) Give a warning that provides sufficient reaction time for safe escape of employees from the workplace, or the immediate work area, or both.
 - (2) Have the capability of being heard or seen above ambient noise or light levels by all employees in the affected areas of the workplace. Tactile devices may be used to alert employees who would not be able to recognize the audible or visual alarms.
 - (3) Give a distinctive and recognizable signal to evacuate the work area or to perform actions designated under the emergency action plan. If the employee alarm system is also used for alerting emergency evacuation team members or for other purposes, a distinctive signal for each purpose must be used.
- c. Procedures for maintenance and testing of employee alarm systems in compliance with appropriate NFPA and OSHA standards.

856.2 **Extinguisher**

The number, type, location, maintenance, and inspection of fire-extinguisher equipment and systems must be in accordance with Handbook MS-56, *Fire Prevention and Control*, and 29 CFR 1910.157-1910.163 as required.

Exception: The maximum travel distance to any portable fire extinguisher must not exceed 50 feet.

Fire-fighting equipment that is in damaged or unserviceable condition must be removed from service and replaced immediately.

857 **Vehicle Protection**

Fire extinguishers and emergency warning kits are to be placed in vehicles in accordance with Handbook PO-701, *Fleet Management*.

858 **Codes, Standards, and Ordinances**

Compliance with Postal Service standards, OSHA standards, National Fire Protection Codes (NFPA), National Building Codes, and state and local fire codes is required. Managers must refer matters concerning fire prevention, extinguishment, and control, which are not covered by municipal or other regulations, to higher authority for resolution.

860 Medical and Occupational Health Services

861 **Scope**

861.1 **Program Overview**

The U.S. Postal Service is committed to a comprehensive National Medical and Occupational Health Program consisting of administrative functions, wellness initiatives, and other medically related activities designed to address the health and safety of employees in the workplace.

861.2 **Mission**

The mission of the National Medical and Occupational Health Program is to reinforce the relationship between health, productivity, and the achievement of the Postal Service's business goals. This is accomplished through the development of quality programs and policies designed to promote and maintain employee health and to help ensure a safe, healthful work environment.

The program's services include but are not limited to the following activities:

- a. Providing preventive medical programs in health counseling, education, and training.
- b. Managing the care of acutely ill or injured employees.
- c. Determining medical ability of applicants and employees to perform the functions of the job.
- d. Managing applicant and employee drug and alcohol testing programs.
- e. Managing compliance with the regulatory requirements of the Department of Transportation, Office of Worker's Compensation Programs, Occupational Safety and Health Administration, and other entities for which program compliance is required.
- f. Managing the medical records of applicants and employees.
- g. Providing recommendations regarding physical capabilities, limitations, accommodation, and rehabilitation of disabled employees or applicants.
- h. Providing immunization services and participating in community health programs such as blood pressure, glaucoma, and diabetes assessments and blood bank programs.
- i. Assisting in the prevention of job-related injuries and illness.
- j. Collecting and analyzing epidemiologic data to detect statistical trends in occupational illness or injury.

861.3 **Approach**

The National Medical and Occupational Health Program presents a uniform approach throughout the Postal Service with respect to occupational health services and health-related activities.

862 Policies**862.1 General Policy**

It is the policy of the Postal Service to provide and maintain work environments that are conducive to and promote the good health and safety of all employees. To furnish the highest quality medical treatment for employees, many postal facilities have on-site health services offices staffed by postal occupational health nurses. These facilities, as well as facilities without on-site health services offices, are further supported by community-based contract medical facilities and providers.

862.2 Medical and Occupational Health Program Facilities**862.21 District Administrative Office**

A Medical and Occupational Health Program administrative office is an office staffed with one or more occupational health nurse administrators and support staff as needed. The role of this office is to administer the Medical and Occupational Health Program at the district level.

862.22 District Health Services Office

A Medical and Occupational Health Program health services office is a service office in a postal facility staffed with one or more career postal occupational health nurses who provide medical and medically related services within that facility. This office is managed by the occupational health nurse administrator who also has the responsibility for administering the National Medical and Occupational Health Program for the district.

862.23 Area Administrative Office

The Medical and Occupational Health Program area administrative office is responsible for the administration of the Medical and Occupational Health Program for the area. The office consists of the senior area medical director, the associate area medical directors, the area occupational health nurse administrator, and support staff.

863 Staffing and Functional Responsibilities**863.1 General**

Senior and associate area medical directors and area and district occupational health nurse administrators implement and manage the Medical and Occupational Health Program and are responsible for ensuring the highest level of service performance and for ensuring adequate medical staffing within their respective locales.

863.2 Staffing**863.21 General**

The Postal Service medical staffing consists of a national medical director, senior area medical directors, associate area medical directors, area and

district occupational health nurse administrators, staff occupational health nurses, and community-based contract medical facilities, physicians, nurses, and consultants.

863.22 **Qualifications**

All physicians must have a current, unlimited license to practice medicine in a state, the District of Columbia, the Commonwealth of Puerto Rico, or a territory of the United States. All nurses must have a current registered nurse (RN) certification and certification in cardio-pulmonary resuscitation (CPR). The full description of qualifications and requirements is found in the standard position descriptions.

863.3 **Administrative and Functional Responsibilities**

863.31 **National Medical Director**

The national medical director:

- a. Plans and develops policy for the National Medical and Occupational Health program.
- b. Provides guidance to the area Human Resources managers and area medical directors.
- c. Evaluates the performance of all aspects of the National Medical and Occupational Health Program.

The national medical director is administratively responsible to the manager of Health and Resource Management.

863.32 **Area Medical Directors**

Senior area medical directors and associate area medical directors provide functional guidance in matters of policy and program requirements to district medical personnel and to postal management. They are also responsible for management of complex cases and issues.

863.33 **Postal Physicians**

863.331 **Duty Assignments**

Full-time and part-time postal physicians' work must be performed on postal premises and under the direction of the Postal Service.

863.332 **Work Schedules**

As specified in 661.42, "An employee may not engage in outside employment or other activity which will interfere with the duties and responsibilities of Postal Service employment..." Work schedule requirements are as follows:

- a. Full-time postal physicians or medical directors are usually scheduled to work a minimum of 8 hours per day, 5 days per week.
- b. Part-time postal physicians or medical directors are usually scheduled to work a minimum of 20 hours per week. Except for occasional changes in the workload, this minimum should be observed.
Consideration should be given by local management to the use of contract physician services if their requirements are generally less than

20 hours per week. Management and the part-time postal physician should establish a mutually agreeable work schedule.

863.333 Duties

Postal physicians perform the following duties:

- a. Manage professional medical and medically related services in the health services office.
- b. Provide treatment of employees who have been injured or who have become ill.
- c. Conduct physical examinations and review examinations performed by other physicians outside the Postal Service.
- d. In conjunction with the area medical director, issue standing orders for all the health services office nursing staff within their area of responsibility.
- e. Visit all health services offices in their assigned area at least every 3 months.
- f. Establish and act as custodian for all employee medical records within their area of responsibility.
- g. Make rounds on the workroom floor at regular intervals and evaluate working conditions to identify and recommend solutions to potential health and safety problems.
- h. Monitor the medical status of employees returned to duty through the rehabilitation program at intervals of 2 to 4 weeks or as indicated.
- i. Review all serious job-related injuries and fatalities to help determine if the employee's medical condition contributed to the injury or fatality (see 822.221).
- j. Work with the Human Resources staff and coordinate medical activity with safety and injury compensation staffs.
- k. Participate in management meetings, particularly those related to health, safety, and injury compensation.
- l. Serve as consultant or expert witness in administrative appeal proceedings, as required.
- m. In conjunction with an occupational health nurse administrator, medically assess reconsiderations of nonveterans and CPS disabled (30 percent or more) veterans' appeals.

863.34 Contract Physicians

Currently licensed physicians, under agreement with the Postal Service, are designated to perform specified medical services on a fee-for-service basis:

- a. Where there is no coverage by a postal physician.
- b. Where the postal physician is on leave.

863.35 **Occupational Health Nurse Administrators**

The occupational health nurse administrators are responsible for the administration of the National Medical and Occupational Health Program within their assigned locales. The duties include but are not limited to:

- a. Providing administrative and policy guidance to local management.
- b. Managing all aspects of health services office activity, including supervision of the staff occupational health nurses.
- c. Designing and implementing programs of preventive health education.
- d. Managing medical contract services and monitoring the quality of work provided by the contractors.
- e. Providing guidance to injury compensation specialists in work-related injury cases.
- f. Ensuring that resources are available for obtaining emergency medical care.
- g. Serving as medical record custodian for assigned locales.
- h. Generating qualitative and quantitative statistics and data.
- i. Providing statistical analysis of data relating to all elements of the National Medical and Occupational Health Program.
- j. Ensuring compliance with the regulatory requirements of the Department of Transportation, Office of Worker's Compensation Programs, Occupational Safety and Health Administration, and other entities for which program compliance is required.
- k. Providing emergency care as needed.

863.36 **Health Services Office Staff Nurses**

Health services office occupational health nurses are functionally and administratively responsible to the district occupational health nurse administrator and to the district Human Resources manager. The duties of the occupational health nurses include but are not limited to:

- a. Providing professional nursing care to employees.
- b. Administering medications at the direction of a physician.
- c. Assisting postal physician in conducting examinations.
- d. Maintaining medical records.
- e. Counseling and referring employees to health-related programs.

(See Handbook EL-806, *Health and Medical Service*, and the standard position description for additional functional responsibilities and duties.)

864 **Medical Assessments and Examinations**

864.1 **Applicant Medical Assessments and Employee Examinations**

It is mandatory that all applicants for career, temporary, or casual employment undergo a medical assessment before job placement.

Employees who are converted to positions with different physical requirements than their present positions must first undergo medical assessments that may include the performance of a focused physical examination addressing those particular physical requirements. (See Handbook EL-312, section 57, for exceptions and scheduling procedures.)

Postal or contract physicians perform applicant examinations, when indicated, at a Postal Service health services office within reasonable commuting distance from the applicant's home or at the postal installation where employment is sought.

864.2 **Determination of Suitability**

See Handbook EL-312, Chapter 5.

864.3 **Fitness for Duty**

See the corresponding management instruction for the specific procedures for fitness-for-duty examinations.

864.31 **Purpose**

The purpose of the Postal Service fitness-for-duty examination is to ascertain whether or not the employee is medically capable of meeting the requirements of his or her job.

864.32 **Requesting Examination**

Management can order fitness-for-duty examinations at any time and repeat them, as necessary, to safeguard the employee or coworker. Specific reasons for the fitness-for-duty should be stated by the requesting official.

In cases of occupational injury or illness, the district injury compensation control office may request an examination in the course of monitoring an injury compensation case (see 545.44).

864.33 **Tests and Consultation**

A specific medical test or consultation may be required in the judgment of the examining physician before rendering a decision on fitness for duty. The indications are documented as part of the report.

865 **Return to Duty After Extended Illness or Injury**

865.1 **Certification After 21 Days**

Employees returning to duty after 21 days or more of absence due to illness or injury must submit medical documentation of their ability to return to work, with or without limitations. The occupational health nurse administrator or postal physician evaluates the medical report and, when required, assists in placing employees in jobs where they can perform effectively and safely.

865.2 **Other Required Certification**

Employees returning to duty after an absence for communicable or contagious diseases, mental and nervous conditions, diabetes, cardiovascular diseases, or seizure disorders or following hospitalization must submit a physician's statement doing one of the following:

- a. Stating unequivocally that the employee is fit for full duties without hazard to him- or herself or others.
- b. Indicating the restrictions that should be considered for accommodation before return to duty.

Requests for restricted duty are reviewed by postal medical personnel and postal management to consider the availability of accommodated work assignments.

865.3 **Contents of Certification**

All medical certifications must be detailed medical documentation and not simply a statement of ability to return to work. There must be sufficient information to make a determination that the employee can return to work without hazard to self or others.

In instances of hospitalization for mental or nervous conditions, the attending physician's certificate must also state that the employee has been officially discharged from the hospital.

In diabetes and seizure disorder cases, the certificate must state that the condition is under adequate control and describe the method of treatment used to ensure that control. The occupational health nurse administrator, postal physician, or contract medical provider makes the final medical determination of suitability for return to duty and/or the need for light or limited duty assignment.

865.4 **Assignments**

Installation heads have the authority to assign any employee returning to duty to an environment away from situations that may have a direct bearing on the conditions that caused the inability to work. They also have the authority to provide useful work for the returning employee during a rehabilitation period, but must be guided by the terms of any applicable collective bargaining agreement.

865.5 **Questionable Conditions**

865.51 **Inability to Perform Duties**

Employees who are unable to perform their duties because of disability, occupational injury, nonoccupational injury, or illness, and who have less than the 5 years service requirement for disability retirement, may be requested to have a fitness-for-duty examination by a postal or contract physician. If the fitness-for-duty examination corroborates that the person is unable to perform the duties of the position, he or she may be subject to separation.

865.52 Employee Claim of Inability to Perform Duties

If the employee claims inability to perform the full duties of the position, the postal installation head must not insist that the employee has to perform such duties without corroborative medical evidence. The installation head may refer the employee for a fitness-for-duty examination.

866 Medical Emergencies

See also Handbook EL-806, *Health and Medical Service*, Chapter 1.

866.1 Requirement

All health services offices must be prepared to respond to emergencies and to provide medical assistance as required.

866.2 Emergency Procedures

The recommended procedures for handling medical emergencies on postal premises are as follows:

- a. Notify the health services office.
- b. Notify security or other designee, who calls 911.
- c. Evaluate (nurse or doctor) to determine severity of injury or illness.
- d. Provide necessary first aid treatment.
- e. Notify postmaster, personnel officer, or senior official in charge.
- f. Transport the employee to hospital by most appropriate means if required.
- g. In non-work-related cases, consult the employee's physician after control of the emergency and before any other arrangements are made. If the physician is not available, transport the employee to the nearest hospital or hospital of choice.

866.3 Posting Emergency Procedures

Instructions to be followed in an emergency must be posted in health services offices and on bulletin boards at appropriate places throughout the facility.

867 Rehabilitation After Work-Related Injury or Illness

Through coordination with the injury compensation program, every effort must be made to return the employee with a work-related injury to duty by:

- a. Assessing the physical ability of an employee so that the employee can return to the workforce as a productive individual.
- b. Recommending assignments in which the pace and physical requirements minimize risk of reinjury.
- c. Consulting with the treating physician's professional medical staff to monitor, at regular intervals, the capabilities of employees with work-related injury or illness.

- d. Consulting when necessary with the appropriate specialists to resolve differences of opinion between the treating physician and the postal physician.

868 **General Procedures**

868.1 **Agreements**

868.11 **Special**

The national medical director is responsible for the medical specifications of contracts requiring periodic physical examinations for a special category of employees (e.g., PCES, postal inspectors) as required by management.

868.12 **Medical Surveillance and Surveys**

Exposure to toxic substances is identified and quantified by the district Human Resources manager, Safety, or senior safety specialist. The district occupational health nurse administrator or area medical director negotiates the surveillance. Such surveys must be coordinated with the senior area medical director. The district Human Resources manager implements appropriate action and notifies the area Human Resources manager.

868.13 **Contract Medical Agreement**

868.131 **Initiating Medical Agreements**

The following are the procedures for initiating medical agreements with contract physicians, clinics, or other health care providers:

- a. The district occupational health nurse administrator or area medical director recommends and renews all agreements using Form 7314, *Medical Agreement*.
- b. Management review of the contract is conducted by the district Human Resources manager. The area medical director approves the agreement as the contracting officer.
- c. A copy of the contract is kept by the district occupational health nurse administrator and area medical director, and copies are furnished to the contractor and to the district Human Resources manager.

Note: Part-time nurses who are covered under the USPS-NPPN Agreement must not be confused with nurses who are contracted using Form 7314. Contracts for nursing services must not violate provisions of the USPS-NPPN Agreement, Article 7.02. Medical services for on-the-job injuries or illnesses must comply with the provisions in ELM 543. Medical services for customer-related accidents must comply with Handbook M-19, *Accident Investigation — Tort Claims*, 253.2.

868.132 **Certification for Payment of Invoices**

As invoices are received for contracted services, the district occupational health nurse administrator or area medical director or designee executes the following procedures before submitting invoices for payment processing:

- a. Verify that the specific services have been rendered and that the invoices are accurate.

- b. Review invoices to detect any inconsistencies such as double-billing (billing twice for the same service on separate invoices).
- c. Certify invoices by either stamping, typing, or handwriting on each *original invoice* the following information: (1) signature and title of the certifying official, (2) name of postal facility, (3) finance number, and (4) date that the services were rendered. A sample stamp reads: "I certify that the goods or services have been received and the invoice is correct and proper for payment."

868.133 **Payment — Statement of Account Offices**

The payment procedures are as follows:

- a. Forward certified invoices to the installation finance office for payment in accordance with local procedures and recording on Form 1555, *Statement of Account* (SOA).
- b. Forward copies of paid invoices to the district occupational health nurse administrator or designees for their files.
- c. Record payment for non-job-related medical services (such as routine medical examinations, nursing services, and first aid treatment that is not related to an on-the-job injury or illness) on the SOA using AIC 578.
- d. Record payment for job-related medical services (such as office visits, X-rays, lab work, pharmaceutical bills, and fitness-for-duty examinations that are required because of an on-the-job injury or illness) on the SOA using AIC 577.
- e. Note that payment for medical services for *customers involved in accidents* on or with Postal Service property is made only for the initial visit and record these payments on the SOA using AIC 597.

868.134 **Payment — Non-Statement of Account Offices**

For those postal installations that do not have a Statement of Account, the following payment procedures apply:

- a. Forward certified invoices to the installation finance office for recording and subsequent forwarding to the San Mateo Postal Data Center (94497-9133).
- b. Send copies of invoices (certifying official) to the occupational health nurse administrator or area medical director or designees for their files.
- c. Charge payment for non-job-related medical services (such as routine medical examinations, nursing services, and first aid treatment that is not related to an on-the-job injury or illness) to General Ledger Account (GLA) 52428.
- d. Charge payment for medical services that are job-related (such as office visits, X-rays, lab work, pharmaceutical bills, and fitness-for-duty examinations that are required because of an on-the-job injury or illness) to GLA 52427.

- e. Charge payment for medical services for *customers involved in accidents* on or with Postal Service property (only for the initial visit) to GLA 55216.

Note: AICs 578, 577, and 597 automatically crosswalk to five-digit expense accounts 52428, 52427, and 55216, respectively, in the General Ledger.

Example: A sample payment log used for recording payment information follows:

Medical Payment Control Log — Calendar Year		
Name:		
Address:		
City:		
State:		
ZIP + 4:		
Social Security Number:		
Invoice Amount	Date Paid	Total Year to Date
_____	_____	_____
_____	_____	_____
_____	_____	_____

868.14 **Health Agreements**

Health agreements are negotiated between the Postal Service and other federal agencies to provide medical services to those agencies at Postal Service facilities. The occupational health nurse administrator and facility manager are responsible for approving such agreements.

868.2 **Malpractice**

Malpractice insurance is not available for postal medical personnel. Representation in civil or criminal proceedings is provided in accordance with 667.2.

868.3 **Preservation of Privacy**

Preservation of the privacy of medical records is a direct responsibility of the postal physician or nurse (see Management Instruction EL-860-98-2, *Employee Medical Records*). In facilities where no medical personnel are assigned, the district occupational health nurse administrator arranges with the installation head to properly secure the medical records.

868.4 Medical Training

See 740.

868.41 Continuation of Training

The Postal Service authorizes training for employees to upgrade or maintain proficiency in their current positions. Continuing medical education by the following is encouraged:

- a. Attendance at seminars and medical meetings to improve the professional skills of occupational health nurse administrators, occupational health nurses, and medical directors.
- b. CPR training (with annual recertification) is required for all medical personnel, at Postal Service expense.

868.42 Requests for Training

Requests for medical training by medical personnel are to be submitted through the employee's supervisor to the appropriate approving official at the installation.

868.5 Conflict of Interest**868.51 Full-Time Medical Personnel**

The following provisions apply for full-time personnel:

- a. Full-time medical personnel must not accept any postal employee as a private patient. *Medical personnel* are defined as physicians, nurses, and other professional personnel. This rule applies to new patients and does not affect physician-patient relationships that were in existence prior to the issuance of this subchapter. The exception is where an existing private relationship creates an actual conflict of interest as defined in 661.42, in which case the relationship must be terminated.
- b. Postal physicians who are treating postal employees in the scope of their duties may not refer employees to their private practice or that of a relative.

868.52 Part-Time and Contract Medical Personnel

The following provisions apply for part-time personnel:

Part-time and contract medical personnel may treat postal employees privately within the bounds of the general ethical conduct standard (661.42) that provides that outside employment may not interfere with the duties and responsibilities of Postal Service employment. Specifically, part-time or contract medical personnel may not:

- a. Coerce, solicit, or inhibit an employee from the free choice of physician in the treatment of an occupational injury or illness.
- b. Serve as the private physician to, or treat in private practice, postal employees sustaining occupational injuries or illness unless the physician is the physician of choice. Any treatment of an employee for an occupational injury or disease by a part-time or contract physician is,

in all cases, considered to be performed within the scope of the physician's postal duties or pursuant to the terms of any contract with the Postal Service for up to two visits. If treatment of the medical condition goes beyond two visits, and if the injured employee selects the contract physician as "physician of choice," the contract physician then becomes the employee's physician and subject to OWCP's regulations rather than those of the Postal Service.

- c. Continue to treat postal employees for a non-job-related injury or illness when the employee initially sought treatment while the physician, nurse, etc., was acting in an official capacity with the Postal Service.

868.53 **Contract Medical Facilities and Providers**

The provisions described in 868.52 are also applicable to medical clinics or other similar facilities under contract with the Postal Service.

This page intentionally left blank

Tab 4

USPS Forms

1767 and 1769



NALC Guide to Safety and Health

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE**I. Employee's Action**

Area (Specify Work Location)		
Describe Hazard, Unsafe Condition or Practice. Recommended Corrective Action.		
Employee	Signature	Date and Tour

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. If Corrective Action Has Been Taken, Indicate the Date of Abatement.		
Supervisor	Signature	Date

III. Approving Official's Action*(Check One and Complete)*

The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):			
A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:			
There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:			
Approving Official	Signature	Date	Date Employee Notified

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated
------------------------	-----------	------	--------------------

INSTRUCTIONS

I. EMPLOYEE

- a. Complete section I, and file it with your immediate supervisor.
- b. If you desire anonymity, complete section I, (including your name) and file the report with the Safety Office. Safety personnel will immediately return the form to your supervisor for necessary action, **and will delete your name from the form to ensure your anonymity.**

II. SUPERVISOR

- a. Investigate the alleged hazard during the same tour of duty in which the report was received.
- b. Abate the hazard if it is within the scope of your authority to do so.
- c. Record the action taken to eliminate the hazard or record recommendation for corrective action in section II, and sign your name.
- d. Forward the original and yellow copy to your immediate supervisor (approving official); send the pink copy to the Safety Office; and give the employee the remaining blue copy as a receipt. **It is your responsibility to monitor the status of the report, at all times, until the hazard is abated.**

III. APPROVING OFFICIAL

- a. Initiate action to eliminate or minimize the hazard. If this results in the submission of a work order, attach the original of this form, and forward through channels, to the manager, Plant Maintenance.
- b. If you determine that there are no reasonable grounds to believe a hazard exists, notify the employee in writing within 15 calendar days. Safety personnel will assist you in this determination when requested.
- c. If the hazard was abated by the first line supervisor or when it has been abated through your actions, notify the employee in writing, and send the original of this form to the Safety Office.

IV. MAINTENANCE SUPERVISOR

When the work order has been completed, sign, date, and return the original of this form to the approving official who will then forward it to the Safety Office.

Use Ball Point Pen to Complete. Press Hard.

J.2. P05 - AL SERVIS

ACCIDENT REPORT

Carefully read instructions in the attached booklet. Items marked with an asterisk (*) must be answered using codes in the attached booklet.

1. Post Office, Station, Branch, Unit (City, State and Zip + 4)	2. Finance Number	3. Insulation ID
<input type="text"/>	<input type="text"/>	<input type="text"/>
		4. Accident Number
		<input type="text"/>

General Information

5. Kind of Accident 1. <input type="checkbox"/> Metal Vehicle 2. <input type="checkbox"/> Natural Event 3. <input type="checkbox"/> Industrial 4. <input type="checkbox"/> Other	6. Fire Involved? 1. <input type="checkbox"/> No 2. <input type="checkbox"/> Building & Contents 3. <input type="checkbox"/> Other	7. Accident Resulted in: 1. <input type="checkbox"/> Personal Injury Only 2. <input type="checkbox"/> Property Damage Only 3. <input type="checkbox"/> Personal Injury & Property Damage 4. <input type="checkbox"/> No Case (No Injury/No Damage)	8. Was Un-Site Investigation conducted by Immediate Supervisor? 1. <input type="checkbox"/> Yes 2. <input type="checkbox"/> No
9. Estimated Property Damage (Amount in nearest dollar) a. Postal b. Non-Postal \$ _____	10. Accident Date Mo. Day Yr	11. Time of Day - 24 Hour Military	12. Day of Week 1. Sun 2. Mon 3. Tues 4. Wed 5. Thurs 6. Fri 7. Sat

Accident Location and Conditions

14. Work Area	15. General Description of Accident Area	16. Building	17. Work Location	18. Specific Description of Accident Area	19. Rep/Sched/Op. No.	20. Shift
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	19a. Delivery House	19b. Emp. Id. No.
21. Surface	22. Surface Conditions	23. Circumstances Leading to Injury or Damage	24. Item Causing Actual Injury or Damage	25. Hazardous Situation Directly Related to Accident	26. Defective or Hazardous Equipment or Materials Related to the Accident	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	

Motor Vehicle Accident Information

(If no vehicle was involved in the accident, skip this section) (Items 28, 35 + 36 are reserved)

27. Total No. of Vehicles Involved	28. Motorcycles	29. Vehicle Type	30. Vehicle Make	31. Were Seat Belts in Use?	32. Roll Over	33. Employee Entered into Vehicle	34. Area of Impact
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	1. <input type="checkbox"/> Yes 2. <input type="checkbox"/> No	1. <input type="checkbox"/> Without Collision 2. <input type="checkbox"/> Before Collision 3. <input type="checkbox"/> After Collision 4. <input type="checkbox"/> No Roll Over	1. <input type="checkbox"/> Normal 2. <input type="checkbox"/> Contacts 3. <input type="checkbox"/> Other Contact	<input type="text"/>

Involved Person(s) Information

37. Total No. of Accident Reports	38. Person I.D. No.	39. If Vehicle Accident Person Described Here Was: 1. <input type="checkbox"/> Pedestrian 2. <input type="checkbox"/> Driver 3. <input type="checkbox"/> Passenger	40. Name (Last Name, First, MI)	41. Age	42. Sex 1. <input type="checkbox"/> Male 2. <input type="checkbox"/> Female
43. Dist. & Actlv.	44. Injuries/Injury Severity	45. Nature of Mgmt Record Injury	46. Part of Body Affected	47. Usual Personal Factors	48. Unsafe Practice
49. Was Employee on Overtime Shift?	50. Postal Service Experience	51. Hours of Safety Training	52. Five Year Post-Accident Record	53. Pay Location	54. LEO-FOV Code
1. <input type="checkbox"/> Yes 2. <input type="checkbox"/> No	Years Max.		No. Prior Vehicle Accidents	No. Prior Industrial Accidents	

Accident Factor(s) & Corrective Actions on Pages 1 & 2 of Form Have Been Reviewed & Are Concurred With.

55. Supervisor's Signature	Date	Supervisor's SEN	56. Next Higher Level Mgr. Signature	Date
57. Supervisor's Printed Name	Telephone No.	58. MSC Safety Officer's Signature	Date	

60. Is a JSA on File?

1. Yes 2. No

61. Preventive Action _____

Accident Number _____

(Explain how the preventive action will eliminate or reduce causes) And prevent similar accidents)

Narrative/Complete Description of Accident

(Describe accident, events leading to accident, causes of injury or damage, and specific location of accident. Provide the who, what, when, where, why, and how of this accident)

Hospital/Physician Information

Hospital/Physician Name	Address	Area Code & Telephone No.
Treatment Date	Diagnosis	Duty Status

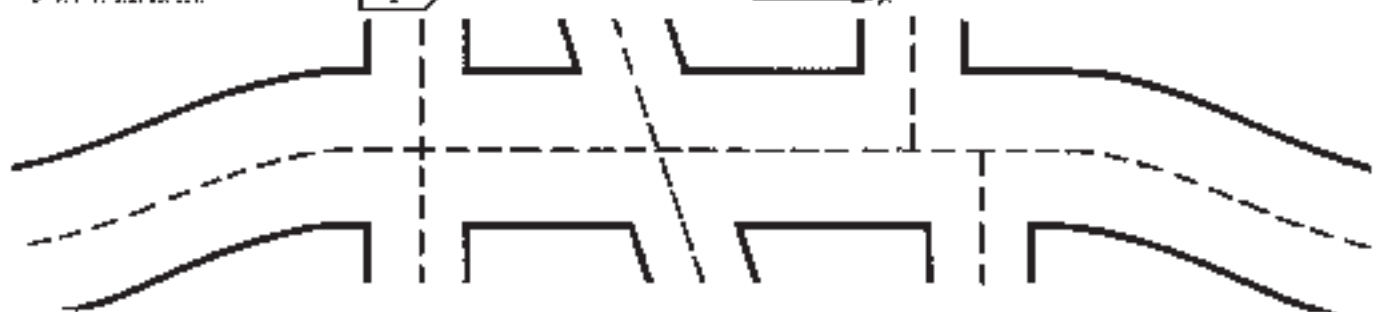
Hazardous Conditions and/or Equipment, Materials, Etc.

(Specify equipment with manufacturer name, model no., serial no., and year made. Where applicable, include vehicle ID no.)

Vehicle Diagram (For use in motor vehicle accidents)

(Indicate on the diagram below what happened. AD/As: Vehicle driven by postal employee is identified as Federal No. 1 regardless of ownership)

- | | | | | |
|---|---|-------------------------------------|--|--|
| 1. Number 1 indicates vehicle 1, unless otherwise noted, which is 1 and does not refer to time by a line.
Example: | 2. Use 1 to indicate post before accident. Before the accident: | 3. Show location of _____ → ○ | 4. Show extent of _____ → + | 5. Indicate vehicle 1 & 2 circle |
| 6. Show number or number of items or objects | 7. Indicate and location in the circle _____ → X | 6. Indicate type and date of system | 8. Indicate time of day (e.g., 10:00 AM) | 9. Show additional details (e.g., driver, vehicle, etc.) |



Instructions

General Information

The supervisor of the employee or operation involved must complete this form for all accidents regardless of extent of injury or amount of damage. Review all instructions and codes before completing this form. The Safety and Health office is available for assistance.

Information forwarded to the Office of Workers' Compensation Programs (OWCP) must not differ from information on this form.

Multiple Person Accidents

When more than one person is injured as a result of the accident, complete a separate form for each individual and use the same accident number on each form. Complete all items for the first person including the narrative. For additional persons involved, complete only items 1-4, 37-55. Note: If more than one postal employee is involved in the accident, follow the instructions outlined above, regardless of whether there was injury or not.

Submission Procedures

1. The supervisor must complete this form within 24 hours of the date of the accident, the diagnosis or illness, or the date they were notified of the situation. The next level supervisor must verify all information on the form.
2. The Manager, Safety and Health Services at the Division has the responsibility for reviewing the accuracy of the coding submitted on each PS Form 1769, *Accident Report*, or electronically entered into the Human Resources Information System (HRIS) Safety and Health Subsystem and accident log. If the codes on PS Form 1769 do not match with the narrative submitted by the supervisor of the employee or operation involved, the Manager, Safety and Health Services, is responsible for resolving the inconsistency.
3. The installation head forwards the original accident report to the safety office within 3 calendar days of the accident.
4. The local office must retain a copy of all reports (reportable or nonreportable) in that office for a 5-year period. Incorrectly filed or improperly coded 1769s may be returned to the originating office by the safety office. These must be corrected and resubmitted within 3 calendar days of receipt.
5. The safety office must:
 - review the completed form to ensure accuracy of codes;
 - coordinate any changes with the reporting office;
 - complete necessary items;
 - assign number and enter the accident information into the HRIS Safety and Health Subsystem within 1 calendar day of receipt; and;
 - retain the original copy for a period of 5 years.

Determining Reportable Accidents

The safety office assigns a number on all forms (Item 4), using HRIS guidelines, for both reportable and nonreportable incidents, including unadjudicated occupational illness cases, when it covers any of the following kinds of injuries, illnesses or damages:

1. All occupational traumatic injuries to postal employees regardless of whether the employee elects to file a Form CA-1 (*Federal Employee Notice of Traumatic Injury & Claim for Continuation of Pay/Compensation*) or a Form CA-6 (*U.S. Dept. of Labor - Official Superiors Report of Employee's Death*) is submitted to OWCP, and regardless of whether or not the OWCP claim is controverted.

EXCEPTION: A First Aid case must be logged and coded "8" in Item 11 of this form. The report must be held as a non-reportable case at the safety office, when first aid care (NOT exceeding 2 visits) is provided by postal medical/health units or contract treating facilities unless the accident involves property damage such as may occur with a motor vehicle accident.

NOTE: Cases with medical dispositive for limited duty are not to be coded as first aid injuries.

2. All occupational illnesses, including heart attacks, if a CA-2 (*Federal Employee's Notice of Occupational Disease and Claim for Compensation*) or CA-6 is submitted to OWCP.

EXCEPTION: If an occupational illness, the form must be forwarded to the safety office for recording in the HRIS. These cases will be logged, assigned a reporting code and number, pending adjudication by the OWCP. Safety offices are to monitor OWCP decisions and amend the status of the case in the HRIS. Instructions for amendments/deletions are included in HRIS Safety and Health Updates.

3. Injuries or fatalities to non postal persons on postal premises.
4. All motor vehicle accidents.
5. Property damage of \$500 or more, regardless of ownership.
6. Fire damage of \$100 or more regardless of ownership.

Adjustments and Deletions

Whenever there is a change in status, or if you discover an error in a previously filed 1769, within 3 calendar days send a copy of the Form 1769 and written justification and documents supporting the amendment/deletion to the servicing safety office for action.

**Instructions for
Items 1-61**

Item 1: **Post Office, Station, Branch, Unit (City, State & ZIP Code)** Self explanatory.

Item 2: **Finance Number** Self explanatory.

Item 3: **Installation ID** — The Installation ID is a 3-digit code.

Item 4: **Accident Number** — The safety office assigns numbers in ascending order, through HHIS, starting each FY with 0001, then 0002, etc. Keep a record of used numbers as duplicate or missing numbers will initiate unnecessary correspondence. Start with 0001 the following FY.

Item 5: **Kind of Accident** — Check the appropriate box.

Motor Vehicle — Any mechanically or electrically powered device designed for movement, not operated on rails, upon which or by which any person or property can be transported or drawn upon a land highway. The load on a motor vehicle is considered part of the vehicle.

Do not consider equipment such as vehicles operated on fixed rails, fork lifts, booms, or similar equipment as motor vehicles.

A motor vehicle accident is any accident involving a motor vehicle which is operated on official postal business, regardless of the ownership of the vehicle and which results in death, injury or property damage of one dollar or more, unless the vehicle is legally parked (see note below). Who was injured, what property was damaged or to what extent, where the accident occurred, or who was responsible is not a factor.

NOTE: A legally parked vehicle is one in which the engine is turned off, the driver is not operating the controls, and the vehicle is parked where it is legal to do so. Temporarily "stopping" a vehicle without turning off the ignition, to load or unload mail, property, or persons, or a vehicle stopped at a sign, signal, traffic signal, or stalled in traffic, does not constitute a legally parked vehicle. If special written permission has been granted by law enforcement or municipal authorities to park in designated "No Parking" areas, and the postal vehicle is otherwise properly parked, the event may be classified as a parked industrial accident.

Natural Event — A natural event accident is any occurrence limited solely to property damage caused by such natural events as hurricanes, flood, lightning, earthquake, volcanic, hail, etc.

Other — This code is used to identify incidents involving vandalism or where only a non-employee was in an accident on postal premises. It shall not be used for incidents involving "on duty" postal employees. Example: A customer falls in a postal lobby.

Item 6: **Fire Involved** — Check appropriate box on the form; if box 2 or 3 is checked, Item 23 must be a fire code (#300-369).

1. None.

2. Building and Contents refers to any type of structure as well as all equipment, vehicles, stores, supplies, or material on, under, or within the structure.

3. Other includes open storage, fires in collection or relay boxes, vehicles, or any other fires not in a building.

Item 7: **Accident Resulted In** — Check applicable box. If box 2 or 3 is checked also complete Items 9 & 10. If box 4 is checked, this is a no incident, nonreportable case. There is no requirement to file a report. That is, no injury or property damage occurred as a result of incident.

Item 8: **Was On-Site Investigation Conducted By Immediate Supervisor?** — Check one.

Item 9: **Ownership of Damaged Property** If there was property damage select appropriate codes from the list below.

a. Postal

- 0 - Not Applicable
- 1 - Postal

b. Non-Postal

- 0 - Not Applicable
- 2 - Other government agency
- 3 - Private party
- 4 - Employee's personal property used in postal operation, including privately owned rural carrier vehicles
- 5 - Fred, leased, or rented
- 6 - Contractor working on premises
- 7 - Star route or messenger
- 8 - Other (explain in narrative)
- 9 - Combination of the above

Item 10: **Estimated Property Damage (round to nearest dollar)** (For example, \$387.65 must be written as \$ 0 0 0 9 9 9) When possible, coordinate estimates with the managers of fleet operations, plant maintenance or procurement services.

a. Enter all postal damage here.

b. Enter all non-postal damage here, including privately owned rural carrier vehicles.

Item 11: **Accident Date** Use numerals. For example, February 28, 1991, must be written as 02/28/91.

Item 12: **Time of Day Accident Happened** - Use 24 hour clock. For example, 1:05 PM must be written as 1305, or 1:45 PM must be written as 1345.

Item 13: **Day of Week** - Check one.

Item 14: **Weather** Enter the code from the following list that best describes the weather at the accident scene.

- | | |
|-----------|--|
| 1. Clear | 4. - Snow |
| 2. Cloudy | 5. - Fog |
| 3. Rain | 6. - Sleet |
| | 8. - Not applicable (if accident happened indoors) |

Item 15: **General Description of Accident Area** Enter the code from the following list that best describes the neighborhood.

- | | |
|----------------------|---|
| 1. City business | 4. Suburban residential |
| 2. City residential | 5. Rural |
| 3. Suburban business | 9. Not Applicable (use this code when accident occurs on postal premises) |

Item 16: **Building Where Accident Happened** - If the accident happened in, or on the premises of a specific building, enter the appropriate code from the following list:

Postal

Associate Office

- | | |
|---------------------------------|--|
| 01 Category A-G P.O. | 13 Headquarters Office |
| 03 Category H-J P.O. | 14 Postal User Center |
| 05 Category K P.O. | 15 Supply Center |
| 06 Category L P.O. | 16 Mail Equipment Shop |
| Station/Branch | 18 Independent Mail Processing Center |
| 02 Category A-G | 19 Mail Bag Depository and Repair Center |
| 04 Category H-J | 22 Railroad Terminal |
| | 23 Truck Terminal |
| 07 Division - Main Office | 24 Bulk Mail Center |
| 08 MSC - Main Office | 26 Postal Training Facility |
| 10 Vehicle Maintenance Facility | 28 Other |
| 11 Airmail Facility | |
| 12 Regional Office | |

Non-Postal

- 50 Other government building
- 51 Customer's building/premises
- 97 Other (Explain in narrative)
- 99 Not applicable

Item 17: **Work Location** — Enter the code from the following list that best describes the type of work area or type of route where the employee was working.

On Postal Premises

- | | |
|---|---|
| 01 Facing tables | 33 Cancellation |
| 02 Processing metered mail | 34 Dispatching/staging area |
| 03 Outgoing letter primary | 35 Outgoing newspaper |
| 04 Outgoing letter secondary | 36 Incoming newspaper |
| 05 Outgoing flat primary | 37 Sack examination area |
| 07 Outgoing flat secondary | 38 NMO and Irregulars |
| 09 Outgoing parcel post primary | 39 OCR — optical character reader |
| 10 Outgoing parcel post secondary | 40 Bar Code Sorter |
| 12 Outgoing small parcels & rolls primary | 42 Office work |
| 13 Outgoing small parcels & rolls secondary | 43 Miscellaneous non-mail handling activities by Mailing Division employees |
| 15 Incoming letter primary | 45 Computerized Forwarding System |
| 16 Incoming letter secondary | 47 Registry |
| 17 Incoming flat primary | 48 Carrier office work |
| 18 Incoming flat secondary | 49 Dock & platform area |
| 19 Incoming parcel post primary | 51 Sorting machine not works, drive platform, and maintenance areas |
| 20 Incoming parcel post secondary | 52 Flat sorting machine (FSM) |
| 21 Sack shakeout/dumping | 55 Others relating to fixed-mechanization |
| 22 Rewrap | 56 Office area |
| 23 Box section/letter casing | 57 Small parcel and bundle sorter |
| 24 Letter sorting machine (LSM) | 58 Walk in vault |
| 25 Parcel sorting machine | 59 Handling unit |
| 26 Container loaders/unloaders | 60 Lobby or customer areas |
| 27 Weighers section and related activities | 61 BI, MP's shops |
| 28 Holler tapes | 62 Carrier shops |
| 29 Sack sorting machine | 63 Battery shop |
| 30 Rotary slides | 64 Industrial vehicle shop |
| 31 Chutes | 65 Custodial equipment room |
| 32 Culling operation | 66 Other Maintenance area
<i>(Explain in narrative)</i> |
| | 67 Parking/maneuvering area |
| | 68 Aisle/Passageway |

Off Postal Premises

- | | |
|---------------------------|-----------------------------|
| 69 Express Mail route | 78 Air route |
| 70 Foot route | 79 Relay route |
| 71 Special delivery route | 80 Park and loop |
| 72 Parcel post delivery | 81 Depot |
| 73 Mounted route delivery | 82 Maintenance |
| 74 Collection route | 83 Enroute to servicing |
| 75 Rural route | 84 Enroute from servicing |
| 76 Interstation route | 85 Parking—maneuvering area |
| 77 Intercity route | |

Miscellaneous

- | | |
|-----------------------|--------------------|
| 87 Lunchroom/canteen | 92 Elevator |
| 88 Rest room | 93 Mail box |
| 89 Boiler room | 94 Conveyor tunnel |
| 90 Machine room | 97 Other |
| 91 Trash room or area | 99 Not applicable |

Item 18: **Specific Description of Accident Area** Enter the code from the following list that best describes the description of the accident area:

- | | |
|-----------------------|-------------------|
| 1 Public street/road | 5 Private road |
| 2 Public sidewalk | 7 Highway |
| 3 Public alley | 8 Expressway |
| 4 Non-Postal premises | 9 Postal premises |
| 6 (Reserved) | |

Item 19: **Route/Schedule/Operation Number** — Enter the route/schedule/operation number on which the employee was working at the time of the accident. If the employee was not on a route or schedule, enter the operation number.

Item 20: **Light** Enter the code from the following list that best describes the type of light in which the accident occurred.

- | | |
|---------------------------|---------------------------|
| 01 Dawn | 04 Light provided but out |
| 02 Dark and unlighted | 05 Daylight clear |
| 03 Lighted or illuminated | 06 Daylight overcast |
| | 07 Dusk |

Item 21: **Surface** Enter the code from the following list that best describes the type of surface on which the accident occurred.

01 Concrete	07 Wood
02 Blacktop	08 Metal
03 Brick and stone	09 Sand
04 Gravel	10 Grass
05 Dirt	11 Other (Explain in narrative)
06 Tile	12 Carpet

Item 22: **Surface Conditions** Enter the code from the following list that best describes the surface conditions on which the accident occurred.

01 Dry	06 Dry or slick
02 Wet	08 Icy
03 Muddy	09 Uneven or potholes
04 Snow	10 Other (Explain in narrative)
05 Loose sand or dirt	

Item 23: **Circumstances Leading to Injury or Damage** — Enter the code from the following list that best describes the action or condition which caused the accident.

Industrial

General

- 001 Caught in, under or between
- 002 Stepping in or on object (not falling)
- 003 Tripping on or tripped by object (not falling)
- 004 Slipping and twisting (not falling)
- 005 Exposure to extreme temperatures
- 006 Inhalation
- 007 Striking against material or equipment
- 008 Jumping in or from places
- 009 Stoop/lifting

Animals

- 010 Dog bite
- 011 Dog incident (other than bite)
- 012 Other animal bite
- 013 Other animal incident (not bites)
- 014 Insect bite/sting

Contact with

- 020 Toxic substances
- 021 Caustic substances
- 022 Radiological substances
- 023 Biological substances (no syringe)
- 024 Biological substances (syringe)
- 025 Electric current
- 026 Chemical (including dog spray)
- 027 Hot or cold objects or substances
- 028 Dust/foreign particle

Falls on same level

- 040 To floors
- 041 To sidewalks/ground
- 042 To street

Falls from elevation

- 050 On stairs/steps
- 061 From platforms
- 062 From porches
- 053 From docks
- 054 From curbs
- 055 From ramps
- 056 From chairs, stools
- 057 From stationary vehicles
- 059 Into floor openings

Lifting, pulling, pushing, throwing, keying

- 080 Lifting from or to a higher level
- 081 Handling at same level
- 090 Pulling from or to a higher level
- 091 Pulling at same level
- 100 Pushing from or to a higher level
- 101 Pushing at same level
- 110 Throwing from or to a higher level
- 111 Throwing at same level
- 120 Repetitive motions/keying
- 121 Repetitive motions—other

Struck by

- 150 Falling objects
- 161 Flying objects
- 162 Material or equipment

Violence/Vandalism

- 160 By postal employee(s)
- 161 By others

Legally Parked/Other

- 170 On roadway
- 171 Off roadway
- 172 Run-over—off-duty vehicle-related

Fires or Smoldering

Electricity

- 300 Short circuit in wiring
- 301 Overloaded wiring or switch
- 302 Defective wiring
- 303 Motors or equipment
- 309 Other (Explain in narrative)

Explosion

- 310 Carburator Lockfire
- 311 Chemical
- 312 Bomb
- 319 Other (Explain in narrative)

Exposure

- 320 From adjoining premises or space

Flammable liquids

- 330 Flooded carburator
- 339 Other (Explain in narrative)

Other

- 350 Incendiarism (deliberately set fire)
- 351 Lightning with fire ensuing
- 352 Merchandise and smoking
- 353 Open flames, wicking & torches
- 354 Overheated grease, fat, oil wax (Example: hot wax)
- 355 Spontaneous ignition
- 356 Stoves, furnaces and boilers
- 369 Miscellaneous known causes
- 369 Underdetermined cause of fire or smoldering

Item 23 Continued:

Motor Vehicle	700	Non collision accidents
400 Rollaway—engine off		
401 Runaway—engine on	800	Not Elsewhere Classified
500 Collision or sideswipe with another vehicle—both vehicles in motion.		
600 Collision or sideswipe with a standing vehicle or stationary object		

Item 24:

Items Causing the Actual Injury or Damage -- Select the code from the following list that best describes the actual article which inflicted the physical injury or damage to property. (Specify manufacturer name, model no., etc. in narrative.)

Vehicle Powered	Mechanical Power Transmission Devices
001 Aircraft	070 Gear
005 Watercraft	071 Belts
009 Railroad	072 Chain, rope, cable
	073 Drums, pulleys, sheaves
	079 Other mechanical power transmission devices
Specific Part of Highway Motor Vehicle	Hand Tools
010 Windshield	080 Not powered
011 Instrument panel—dashboard	081 Chisels
012 Delivery tray	082 Grinder, buffer, sander
013 Driver's seat	085 Saw
014 Rider's seat	087 Hammers, riveter, air/pneumatic
015 Steering wheel or column	089 Other hand tools
016 Foot pedals	
017 Doors	Machines Powered
018 Windows	100 Buffers, do-ers, sanders, grinders
019 Top structures	101 Canselling machines
020 Floor structures	102 Tying (Plastic Strapping)
021 Cargo gate	106 Tying (twine)
022 Partition	130 Electric arc welder
023 Mirrors	132 Drill press
024 Gear shift	138 Sander
026 Visors	140 Sew, circle
027 Door or window handles	142 Sew, hand
028 Moving cage	201 Tray mail conveyors
029 Cargo restraints	203 Driver tray mail mechanization
030 Operator manuals	204 Belt conveyors, carrels, sacks, and pallets
031 Fenders	208 Sack sorting machines
032 Bumpers	209 Parcel sorting machines—fixed
033 Wheels	210 Small parcel and bundle sorting machine
034 Grill	211 Monorail conveyors
035 Hood	212 Elevators
	213 Uverters
Containers	216 Extendable conveyors
040 General purpose mail container (GPMC)	218 Chutes, slides or roller tables
041 BMC-OTR	220 Automatic fine culler
042 BMC-In-house	221 Other mail preparation mechanization
043 Letter tray transport	222 SPLSM
044 Eastern Region mail container (ERMC)	223 Other conveyors—powered
046 Large hampers with wheels (1066)	224 Other fixed mechanization
048 Small hampers with wheels (1033)	225 Portable conveyors
047 Wire mesh container	227 MPLSM—excluding dropper assembly
048 Other container	228 MPLSM—dropper assembly
	229 OCH Model KC2B
Vehicles—Industrial Powered	230 OCH Model 3580 PB
050 Fork lift	231 OCH Model 885
051 Tug	232 OCH Other Models
052 Tractor	
053 Vert lift	
054 Personnel Carriers	
055 Pallet lift	
Vehicles—Industrial Not Powered	
061 Jolies	
062 Warehouse trucks (2-wheeled hand trucks, some with folding base)	
063 Gaddy carrier cart	
066 Nutting/platform truck	
067 Utility cart	
068 Other, industrial vehicles— not powered	

Machines Powered, (Continued)

233 BCS Model HA 9
 234 BCS Model 890
 260 BCS Model OBCS 990
 261 BCS Model 915
 235 BCS Other Models
 236 FSM Model 175
 237 FSM Other Models
 238 Face Canceler Mark I
 239 Face Canceler M-36
 270 Face Canceler FAM-885
 240 Face Canceler—Other Letter Mail
 241 Face Canceler—Model 15
 242 Face Canceler—Other Models
 243 Venang Machines/Changers
 244 Harpur Dumper
 245 Palet Dumper
 246 Shoeing Machine
 247 Hair Seal Machine
 248 Sclaver Lift
 249 Driveless Tractor
 250 Keyboards (typewriters, word processors, IBM 5M Cardkeys, etc.)
 251 Video Display Terminal
 299 Other machines not listed above

Miscellaneous

400 Acids
 403 Alcohol
 408 Animals (other than dogs), example:
 birds
 409 Atmosphere (cold or hot)
 412 Barrels and drums
 418 Benches/work
 421 Bolers/breathing vessels
 424 Books
 427 Bombs
 433 Carbon dioxide/monoxide
 439 Cases
 440 Chairs, LSM
 441 Chairs, other
 442 Chemicals, detergents and chemical compounds
 445 Cleaning compounds/soup
 448 Cups (paper)
 451 Clothing
 457 Conveyors—non-powered
 460 Counters
 461 Carts
 466 Debris/trash/curb-spew waste materials
 469 Desks (copy)
 475 Decks/platforms
 476 Deck plates or boards
 478 Dogs
 481 Doors
 484 Drugs/illegal

 477 Diner
 487 Electric apparatus (other than tools)

 488 Elevator
 490 Fasteners
 497 File cabinets
 493 Fire
 496 Firearms
 496 Floors
 498 Foreign object
 499 Furniture
 502 Furniture
 505 Gasoline
 506 Ground
 508 Gurney (hopper—no wheels)
 511 Heaters (space)
 514 Hoisting apparatus
 515 Hose
 407 Insects
 517 Knives

520 Ladders
 551 Lawn mower
 552 Lockbox
 529 Lockkey LA/holder/rotary
 532 Lockers (clothing)
 535 Lumber/wood products
 541 Mail (not large for cancelling machines)
 547 Mail boxes (collection & storage)
 548 Mail boxes (customer)
 553 Mail pouch racks (to hang empty)
 558 Mail sack (does not bundle)
 557 Medicine
 562 Newspapers (bundled)
 664 Paper
 665 Oil/petroleum products
 568 Pallets/skids
 668 Plastic bands/strapping
 567 Pencil
 574 Rest bars
 575 Ring knife
 578 Sack buckle nosp
 578 Scissors
 579 Sharp instrument
 580 Shoes
 583 Smoke
 444 Snow blower
 446 Solvents
 586 Staples
 589 Steam

 571 Stoves
 590 Steps/ladders
 592 Tents
 593 Welding slag/spark
 601 Windows
 805 Trees/branches/limbs
 806 Stools
 807 Sidewalk/street
 808 Rubber bands

Boxes, crates and containers

710 Less than 10 lbs.
 711 11-20 lbs
 712 21-40 lbs
 713 41-70 lbs
 714 71 lbs and over

Mail Trays

740 Less than 10 lbs
 741 11-20 lbs
 742 21-40 lbs
 743 41-70 lbs
 744 71 lbs and over

Mail Sack/Pouch

760 Less than 10 lbs
 761 11-20 lbs
 762 21-40 lbs
 763 41-70 lbs
 764 71 lbs and over

Satchels

770 Less than 10 lbs
 771 11-20 lbs
 772 21-40 lbs
 773 41-70 lbs
 774 71 lbs and over

Other installed equipment

780 Less than 10 lbs
 781 11-20 lbs
 782 21-40 lbs
 783 41-70 lbs
 784 71 lbs and over

999 Other (Explain in narrative)

Item 29: **Vehicle Type** — For postal owned vehicles enter the make/model code number from the most recent Fleet Management Bulletin. Be sure to use all 4 digits.

If the accident involved non-postal vehicles, enter a code from the following list.

0091 Contract	0095 GSA
0092 Leased	0096 Private - rural carriers (RHD)
0093 Private - drive nur agreements	0098 Other vehicles used on official Postal operations
0094 Private - rural carriers (LHD)	0099 All others—non postal

Item 30: **Vehicle Path** Enter the code from the following list that best describes the movement of the vehicle immediately preceding the accident.

01 Straight ahead	12 Jackknifing
02 Left turn	13 Running off road
03 Right turn	14 Pulling to curb/mailbox
04 U-turn right	15 Pulling from curb/mailbox
05 U-turn left	16 Unattended vehicle moving
06 Peeling	17 Unattended vehicle stopped
07 Being pushed	18 Legally parked
08 Backing	19 Entering curve
09 Slowing	20 Changing lanes
10 Stopped	47 Other (Explain in narrative)
11 Skidding	49 Not applicable

Items 31-33: **Self-explanatory.**

Item 34: **Initial Area of Impact**

Passenger Cars, Jeeps, LLVs, Trucks (Excluding 5 & 7-Ton Trucks & Tractor Trailers)

01 -front end	06 Right rear side
02 Right front side	07 Left rear side
03 Left front side	08 Rear end
04 Right occupant side	09 Top structure
05 Left occupant side	10 Under carriage

5-Ton or Larger Trucks and Tractor Trailers ONLY

11 Front end	18 Right rear cargo side
12 Right front side	19 Left rear cargo side
13 Left front side	20 Rear end
14 Right occupant side	21 Top structure
15 Left occupant side	22 Under carriage
16 Right front cargo side	27 Other, regardless of vehicle size (Explain in narrative)
17 Left front cargo side	

Items 35 & 36: **Reserved.**

Item 37: **Total No. of Accident Reports** - One form must be submitted for each person injured. See "Multiple Person Accidents", p. 1 of Instructions.

Item 38: **Person Identification No.** If only one person was injured in the accident enter "1". For each additional injured person, complete an additional 1769, numbering each consecutively in this space. See "Multiple Person Accidents", p. 1 of Instructions.

Item 39: **Self-explanatory.**

Item 40: **Name** — Name of person involved in accident.

Item 41: **Age** — If the actual age of a non-postal person is unknown, enter an estimated age.

Item 42: **Self-explanatory.**

Item 43: **Designation and Activity** Enter the 3 digit DES/ACT code for the employee in the space provided. For non-postal, enter one of the codes below:

001 Customer or general public	002 Non-postal Government employee
--------------------------------	------------------------------------

Item 44: **Injury/Illness Severity** - Enter the code from the following list that best describes the type of injury, if any, experienced by the person identified in item 40 of this form.

Postal Employees

1. **Fatality:** A fatality is any work-related injury or illness which results in death, regardless of the time between the injury and death, or length of illness. If death occurs after submission of an Accident Report you must change the severity code in the HRIS.
2. **Lost-Workday Case:** A lost-workday case results from a work-related injury or illness severe enough to render an employee unable to perform any duties on any workday or workdays, consecutive or not, after the day of injury or diagnosis of illness during which the employee would have worked but could not because of the injury or illness.

Item 44—Continued

3. **Lost-Time-Limited Duty Case:** A lost-time limited duty case is any work-related injury or illness severe enough to cause an employee to be unable to work the number of daily or weekly hours that the employee would normally work on any day after the day of injury or diagnosis of illness. For example: a full-time employee who works less than 8 hours a day, or less than 40 hours a week; or part-time employee who normally averages 30 hours a week, but can only work 15 hours a week because of the injury or illness.
4. **No-Lost-Workday-Case:** A no-lost-workday case is any work-related injury or illness which requires medical treatment and which does not result in a fatality, lost workday, limited duty, first aid, termination, or permanent reassignment case.
5. **A No-Lost-Time-Limited-Duty Case:** A no-lost-time-limited-duty case is any work-related injury or illness which results in a limited duty assignment and does not reduce the number of hours the employee would normally work. For example: an employee assigned to other duties in the same craft, another craft, or other installation without any reduction of hours normally worked, on any day after the date of injury or diagnosis of illness.
6. **A First Aid Case:** A first aid case is normally any work-related minor injury that requires no more than two medical visits, the second of which is to confirm full recovery. Form 1769 must be completed for all first aid injury cases, both reportable and nonreportable. All first aid cases must be logged and coded "5" in Item 44. First aid cases not exceeding two visits provided by the postal medical officer or contract physician is recorded as *nonreportable* in the HRIS. First aid care provided by the employee's private physician or emergency room or other meeting facilities, for which medical payment will be made through OWCP, must be logged and recorded as a *reportable* case in HRIS and coded "8" in Item 44.

All major vehicle accidents resulting in property damage or personal injury, including first aid, are reportable.

Cases resulting in a medical disposition of disability and/or limited duty assignment, regardless of the number of medical visits, are not to be recorded as first aid cases. For reporting purposes, when employees sustain an injury but decline treatment, the case is to be logged and recorded in the HRIS as a nonreportable first aid case. Examples of first aid treatment are:

- A. Application of antiseptic on the first visit to a doctor or nurse. It does not matter whether the doctor or nurse is located at a postal medical unit, private physician's office, public or private clinic, or a hospital.
- B. Bandaging.
- C. Treatment for first-degree burns.
- D. Application of compress, hot or cold.
- E. Use of an elastic bandage.
- F. Irrigation of the eye to remove foreign bodies not embedded.
- G. Removal of foreign bodies from a wound by tweezers or other simple techniques.
- H. Administration of non-prescription medications.
- I. Observation of injury.
- J. Applications of ointments to abrasions to prevent drying or cracking.
- K. Tetanus shots, in gel or boosters alone.
- L. X-ray, if negative.

NOTE: Do not consider any injury involving loss of consciousness, restriction of work or motion, or reassignment to another job as a first aid case.

7. Termination or permanent reassignment involving a lost workday case.
8. Termination or permanent reassignment involving a lost time limited duty case.
9. Termination or permanent reassignment not involving a lost workday or lost time-limited duty case.
0. No injury

Non-Postal People

- x. Non-postal fatality
- y. Non-postal injury
- z. No injury

Item 45: **Nature of Most Severe Injury or Illness** — Select the code from the following list that best describes the nature of the injury or illness.

Injury Codes:

- 00 No injury
- 01 Amputation
- 02 Removal of eye
- 03 Asphyxiation/suffocation
- 05 Drowning
- 06 Bites (animals or insects)
- 07 Burns (hot substances)
- 08 Burns (chemicals, acids, etc.)
- 09 Burns (radiation, sunburn, etc.)
- 10 Concussion (or any head blow causing unconsciousness)
- 11 Concusion (bruise, crushing—skin intact)
- 12 Cuts (open wounds—greater than scratches)
- 13 Abrasions/scratches
- 14 Dislocation
- 15 Electric shock
- 16 Fractures or breaks
- 18 Gunshot wounds
- 20 Heart attack
- 21 Ruptured disc
- 22 Hernia-rupture
- 23 Strain
- 24 Sprain
- 39 Other Injury (Explain in narrative)
- 40 Foreign objects in eyes

Occupational Illness Codes: An occupational illness or disorder of an employee is any physical condition or disorder caused by exposure to environmental factors associated with the employment over a period longer than a single workday or shift.

- 60 **Occupational Stress**
- 61 **Occupational Skin Diseases or Disorders.** Examples: Contact dermatitis, eczema, or rash caused by primary irritants, and sensitizers or poisonous plants; oil acne; chrome ulcers; chemical burns or inflammations; etc.
- 62 **Dust Diseases of the Lungs (Pneumoconiosis).** Examples: Silicosis, asbestosis, coal worker's pneumoconiosis, byssinosis, and other pneumoconioses.
- 63 **Respiratory Conditions Due to Toxic Agents.** Examples: Pneumonitis, pharyngitis, rhinitis or acute congestion due to chemicals, dusts, gases, or fumes; farmer's lung, etc.
- 64 **Poisoning. (Systemic Effects of Toxic Materials).** Examples: Poisoning by lead, mercury, cadmium, arsenic, or other metals; poisoning by carbon monoxide, hydrogen sulfide or other gases; poisoning by benzol, carbon tetrachloride, or other organic solvents; poisoning by insecticide sprays such as parathion, lead arsenate; poisoning by other chemicals such as formaldehyde, plastics and resins, etc.
- 65 **Disorders Due to Physical Agents. (Other Than Toxic Materials).** Example: Heatstroke, sunstroke, heat exhaustion and other effects of environmental heat; freezing, frostbite and effects of exposure to low temperatures; cisson disease; effects of ionizing radiation (radioisotopes, X-rays, radium); effects of nonionizing radiation (sawdust, flash, ultraviolet rays, microwave, radars), etc.
- Disorders Due to Repeated Trauma.** Examples: Synovitis, bursitis, Reynaud's phenomenon and other conditions due to repeated motion, vibration or pressure.
- 66 **Tenosynovitis**
- 67 **Tendonitis**
- 68 **Carpal Tunnel Syndrome**
- 69 **Hearing Loss**
- 70 **Epicondylitis**
- 71 **De Quervain's**
- 72 **Hand Arm Vibration Syndrome**
- 98 **Other Disorders Due to Repeated Trauma**
- 99 **All Other Occupational Illnesses.** Examples: Anthrax, brucellosis, infectious hepatitis, malignant and benign tumors, food poisoning, histoplasmosis, acid-fast mycosis, etc.

Item 46: **Part of Body Affected** — Select the code from the following list that best describes the body part which was affected by the most severe injury.

00 Not applicable

Head and Neck

- 01 Ear(s)
- 02 Eye(s)
- 03 Face
- 04 Skull, scalp
- 05 Nose
- 06 Tooth/Teeth/Mouth
- 09 Multiple head injuries (noncombination from 01-06)
- 16 Neck

Upper Extremities—Arm

- 20 Upper arm
- 21 Elbow
- 22 Lower arm
- 23 Multiple arm injuries (combination from 20-22)
- 24 Wrist
- 25 Hand(s)
- 26 Finger(s)
- 29 Multiple injuries (combination from 01-26)

Item 46 - Continued:

Trunk		Other Body Parts	
31	Abdomen (include internal organs)	50	Multiple parts (more than one major area above)
32	Back	60	Circulatory system (heart, arteries, veins, etc.)
33	Chest (include ribs, breast bone, and internal organs)	70	Respiratory system (lungs, etc.)
34	Hips (include pelvic organs and buttocks)	80	Nervous system/psychological
35	Shoulder	99	Insufficient information to identify part
39	Multiple trunk (combination from 31-35)		
Lower Extremities—Leg			
40	Thigh		
41	Knee		
42	Lower leg (above ankle)		
43	Ankle		
44	Foot (not ankle or toes)		
45	Toes		
49	Multiple lower extremities (combination from 40-45)		

Item 47: **Unsafe Personal Factors** — If any of the following situations contributed to the accident, enter the corresponding code. If more than one apply, enter the one most responsible for the accident.

01	Didn't see (Explain in narrative)	09	Willful disregard of instructions
02	Didn't hear (Explain in narrative)	10	Using drugs (CSD, heroin, etc.)
03	Failure to comply with rules	11	Harassment
05	Operating without authority	12	Fatigue
06	Using alcoholic beverage	39	Other unsafe personal factor (Explain in narrative)
07	Inadequate help for heavy lifting	48	No unsafe personal factor
		49	Not applicable

Item 48: **Unsafe Practice** — Enter the code that best describes the unsafe practice that was most responsible for the accident and/or injury.

Industrial		Failure To	
01	Removing safety devices	30	Seat passenger
02	Adjusting or clearing moving equipment	31	Use safety belts
03	Haste	32	Check or adjust mirrors
04	Removing jam or clearing equipment (without shutting off power)	33	Give proper signal
05	Using defective equipment	34	Check clearance
06	Not using protective equipment	35	Yield right-of-way
07	Overloading	36	Close vehicle door
08	Unsafe carrying, placing, loading	37	Observe traffic sign or signals
09	Throwing material (instead of carrying or passing)	38	Set handbrake
		39	Keep both hands on wheel
10	Inattention or distraction (not caused by verifying or fingering mail)	Industrial and Motor Vehicle	
11	Inattention or distraction caused by fingering mail	Improper	
12	Taking shortcuts	40	Placing of mail (on seat, tray, etc.)
13	Pushing instead of pushing/rolling equipment	41	Securing of load
14	Failure to correct known hazard	42	Starting and stopping
15	Failure to follow lockout procedures	43	Backing
		44	Parking
		45	Turns
		46	Lane changes
		47	Use of equipment or materials
		48	Verifying or fingering mail (while walking up or down stairs or curbs, driving, or when crossing streets)
		49	Lifting
		60	Use of rear bars
		67	Other unsafe practices (Explain in narrative)
		68	No unsafe practice
Motor Vehicle			
20	Jumping from moving vehicle		
21	Stopping vehicle with parking brake instead of foot brake		
22	Driving too fast for conditions		
23	Driving in wrong lane		
24	Passing in unsafe area		
25	Running changing traffic light		
26	Following too closely		
27	Operating without eye glasses when required		
28	Exceeding speed limit		

- Item 49: **Social Security Number** Enter the employee's social security number. For non-union persons enter at 5's.
- Item 50: **Was Employee on Overtime Status?** — Check one.
- Item 51: **Postal Service** Round off length of years in the Postal Service to the nearest whole month and enter this number. For example: enter 1 year 6 months and 10 days as 01/06.
- Item 52: **Hours of Safety Training** — Enter hours of safety training employee received within the last five years as recorded on PS Form 2548 — or other available records.
- Item 53: **Self-explanatory.**
- Item 54: **Pay Location** — Enter the pay location of the employee at the time of the accident. If not applicable enter "000".
- Item 55: **LDC/FDN Code** — Enter the LDC Code of the employee at the time of the accident. If not applicable enter "00". (If you do not know the LDC Code, consult your timekeeper.)
NOTE: You must enter a LDC Code (or "00"). If you do not, this 1/89 will be returned. At a future date, instructions will be provided concerning the replacement of the LDC Code with the 4 digit FDN Code.
- Items 56-59: **Self-explanatory.**
- Item 60: **Is A JSA (PS Form 1783, On-the-Job Safety Review/Analysis) On File?** Indicate whether an analysis is on file for the job task being performed at the time of accident or injury.
- Item 61: **Preventive Action Code** Enter the code from the following list that best describes the action you will take to most effectively eliminate or reduce the accident cause(s) and prevent similar accidents.

- | | | | |
|----|---|----|---|
| 01 | Provide training/instruction to ensure that employee understands established job procedures and will recognize similar hazards or unsafe practices in the future. | 08 | Provide adequate hazard warning signs or notices. |
| 02 | Establish proper job procedures for task to be performed. | 09 | Initiate action to determine if employee meets physical requirements of the job. |
| 04 | Simplify established job procedures if complex or unclear. | 10 | Formal discipline proposed. |
| 05 | Ensure that employee has skill or knowledge to perform task. | 11 | Ensure adequate supervision. |
| 06 | Motivate employee to properly perform task. | 12 | Initiate action to improve/replace equipment or layout design. |
| 07 | Initiate work order. | 13 | Initiate action to improve/repair equipment maintenance procedures or housekeeping. |
| | | 14 | Ensure availability of and/or provide proper protective equipment, notices, or tools. |
| | | 15 | Other (Explain in narrative). |
| | | 18 | Notify animal control authorities. |
| | | 99 | Not applicable. |

Instructions for Narrative

Complete the narrative first and provide the information listed below. This will make it easier to select the proper codes.

Be specific and provide as much detail as possible when completing the narrative. Describe the specific task(s) which the employee was performing immediately prior to the accident, noting whether the task(s) was being properly performed. Indicate whether or not the employee was aware of a hazard and if so, describe exactly what the employee was doing at that time. Describe the employee's reaction to avoid the hazard, if any. Specifically describe the interaction between the employee and the hazard which caused the injury or property damage, and describe the resulting injury or property damage.

Hospital/Physician Information

If the accident resulted in an injury to the person named on this report, record the attending physician's name (if known), hospital and/or treating medical facility, address and phone number. Additionally, provide the date the employee received medical treatment and resulting diagnosis and work status.

Hazardous Conditions, and/or Equipment, Materials, Etc.

If the contributing cause of the accident was due to hazardous conditions and/or equipment or material, include the manufacturer's name, make and model number (vehicle ID number, where appropriate) of the equipment/material involved in the accident.

Vehicle Diagram

If the report involves a motor vehicle accident, diagram the accident on page 2 using the space provided. Indicate, show the direction of postal vehicle travel, point of collision with other vehicle, etc., and use items 1 through 11 of this section, as appropriate, to illustrate what happened.

Tab 5

Occupational Safety and Health Act (OSHA)



NALC Guide to Safety and Health

All About
OSHA

**Occupational Safety
and Health Administration**

www.osha.gov

OSHA 2056-07R
2003

This booklet provides a general overview of basic topics related to OSHA and how it operates. Information provided does not determine compliance responsibilities under OSHA standards or the *Occupational Safety and Health Act of 1970*. Because interpretations and enforcement policy may change over time, you should consult the agency for the most up-to-date information. Much of it is available at the website: www.osha.gov. The website also includes locations and phone numbers for OSHA offices around the country. If you do not have access to the website, call (800) 321-OSHA (6742). This information is available to sensory impaired individuals upon request. Voice phone: (202) 693-1999; teletypewriter (TTY) number: (877) 889-5627.

This publication is in the public domain and may be reproduced, fully or partially, without permission. Source credit is requested but not required.



All About
OSHA

Occupational Safety
and Health Administration
U.S. Department of Labor

OSHA 2056-07R
2003

Contents

2	Purpose & History
4	OSH Act OSHA Coverage Rights and Responsibilities Under the Act Legal Protections Public-Sector Employees Advisory Groups
11	State Programs
13	Standards & Guidance Requirements The Standards-Setting Process Variances Reporting Recordkeeping
21	Programs & Services: Strong, Fair, and Effective Enforcement The Inspection Process Violations and Penalties Contesting Inspection Results Outreach, Education, and Compliance Assistance Outreach Materials Education and Training Compliance Assistance OSHA Consultation Service Partnerships and Other Cooperative Programs Alliances OSHA Strategic Partnerships Voluntary Protection Programs
36	OSHA Quotes
37	Regional Offices
38	Index

More than three decades ago, the *Occupational Safety and Health Act of 1970* created the Occupational Safety and Health Administration to help employers and employees reduce injuries, illnesses, and deaths on the job in America. Since then, workplace fatalities have been cut by 62 percent and occupational injury and illness rates have declined 40 percent. At the same time, U.S. employment has doubled and now includes nearly 115 million workers at 7 million sites.

OSHA provides national leadership in occupational safety and health. The agency seeks to find and share the most effective ways to get results—to save lives and prevent injuries and illnesses. The message is simple—Safety and health add value: To your business. To your workplace. To your life.

For business, protecting workers' safety and health is the right thing to do. It saves money and adds value to the organization. When workers stay whole and healthy, businesses experience lower workers' compensation insurance costs, reduced medical expenditures, decreased payout for return-to-work programs, fewer faulty products, and lower costs for job accommodations for injured workers. There are also indirect benefits such as increased productivity, lower costs for training replacement workers, and decreased costs for overtime.

Every workplace is a community. Safety and health add value to workplaces by increasing morale, improving productivity, and reducing turnover. The best companies build a reputation that is synonymous not only with an excellent product, but also an outstanding work environment where safety and health is a core value.

Every employee benefits when safety and health is a priority at the workplace. Every worker wants to make a contribution through his or her job, yet the primary purpose of work is to make a living. Safety and health add value to the lives of workers by enabling them to maintain their incomes and provide for their families. Getting hurt or sick is not just physically painful. On-the-job injuries and illnesses can significantly reduce income, increase stress, and hinder a full family life.

Establishing a safe and healthful working environment requires every employer and every worker to make safety and health a top priority. The entire workforce—from the CEO to the most recent hire—must recognize the value of safety and health and acknowledge that this is central to the mission and key to the corporate vision and identity.

OSHA provides leadership and encouragement to employers and workers to help them recognize and realize the value of safety and health on the job. The agency's ultimate goal will always be to reduce injuries, illnesses, and deaths to zero.

Purpose & History

OSHA's establishment

OSHA stands for the Occupational Safety and Health Administration, an agency of the U.S. Department of Labor. The U.S. Congress, led by U.S. Senator Harrison A. Williams Jr. and U.S. Representative William A. Steiger, passed the *Occupational Safety and Health Act of 1970* (the *OSH Act*)¹ “...to assure so far as possible every working man and woman in the nation safe and healthful working conditions and to preserve our human resources.” The legislation, signed into law by President Richard M. Nixon on Dec. 29, 1970, established OSHA and its sole responsibility to provide worker safety and health protection.

Who OSHA affects

Nearly everyone in America works or has someone in the immediate family who does. Whether you are an employer, employee, or have a family member who works, you need to know about OSHA. The more you know about OSHA, the better you can protect yourself, your coworkers, or your employees and contribute to safe and healthful working conditions for all Americans.

Why OSHA is necessary

Until 1970, no uniform or comprehensive provisions existed to protect against workplace safety and health hazards. At that time:

- Job-related accidents accounted for more than 14,000 worker deaths,
- Nearly 2.5 million workers were disabled by workplace accidents and injuries,
- Ten times as many workdays were lost from job-related disabilities as from labor strikes, and
- The estimated new cases of occupational diseases totaled 300,000.

In terms of lost productivity and wages, medical expenses, and disability compensation, the burden on the nation's commerce was staggering. The human cost was beyond calculation.

Today, OSHA helps to safeguard the right to a safe and healthful work environment for nearly 115 million workers—America's most valuable national resource.

OSHA's impact

Since OSHA's creation in 1970, the nation has made substantial progress in occupational safety and health. OSHA and its many partners in the public and private sectors have:

- Cut the work-related fatality rate by 62 percent,
- Reduced overall injury and illness rates by 42 percent,
- Virtually eliminated brown lung disease in the textile industry, and
- Reduced trenching and excavation fatalities by 35 percent.

¹ Public Law 91-596, Dec. 29, 1970; as amended by P.L. 101-552, Nov. 5, 1990; as amended by P.L. 105-198, July 16, 1998; as amended by P.L. 105-241, Sept. 29, 1998.

OSHA's continued role

Despite these important successes, significant hazards and unsafe conditions still exist in U.S. workplaces.

Each year:

- Almost 6,000 Americans die from workplace injuries;
- Perhaps as many as 50,000 workers die from illnesses in which workplace exposures were a contributing factor;
- Nearly 6 million people suffer non-fatal workplace injuries; and
- The cost of occupational injuries and illnesses totals more than \$170 billion.

What OSHA does

OSHA uses three basic strategies, authorized by the *Occupational Safety and Health Act*, to help employers and employees reduce injuries, illnesses, and deaths on the job:

- Strong, fair, and effective enforcement;
- Outreach, education, and compliance assistance; and
- Partnerships and other cooperative programs.

Based on these strategies, OSHA conducts a wide range of programs and activities to promote workplace safety and health. The agency:

- Encourages employers and employees to reduce workplace hazards and to implement new safety and health management systems or improve existing programs;
- Develops mandatory job safety and health standards and enforces them through worksite inspections, employer assistance, and, sometimes, by imposing citations, penalties, or both;

- Promotes safe and healthful work environments through cooperative programs, partnerships, and alliances;
- Establishes responsibilities and rights for employers and employees to achieve better safety and health conditions;
- Supports the development of innovative ways of dealing with workplace hazards;
- Maintains a reporting and record-keeping system to monitor job-related injuries and illnesses;
- Establishes training programs to increase the competence of occupational safety and health personnel;
- Provides technical and compliance assistance and training and education to help employers reduce worker accidents and injuries;
- Works in partnership with states that operate their own occupational safety and health programs; and
- Supports the Consultation Service.

OSH Act

OSHA Coverage

Who the act covers

The *OSH Act* covers all private-sector employers and their employees in the 50 states and all territories and jurisdictions under federal authority. Those jurisdictions include the District of Columbia, Puerto Rico, the Virgin Islands, American Samoa, Johnston Island, the Canal Zone, and the Outer Continental Shelf Lands as defined in the *Outer Continental Shelf Lands Act*.

OSHA coverage includes:

- Employers and employees in varied fields that include but are not limited to manufacturing, construction, longshoring, shipbuilding, ship breaking, ship repair, agriculture, law, medicine, charity and disaster relief, organized labor, and private education; and
- Religious groups to the extent that they employ workers for secular purposes.

The *OSH Act* covers employers and employees either directly through federal OSHA or through an OSHA-approved state program. (For more information about state programs, see page 11.)

Who is not covered

The *OSH Act* does not cover:

- The self-employed;
- Immediate members of farming families on farms that do not employ outside workers;

- Employees whose working conditions are regulated by other federal agencies under other federal statutes. These include mine workers, certain truckers and transportation workers, and atomic energy workers;
- Public employees in state and local governments; some states have their own occupational safety and health plans that cover these workers.

Responsibilities and Rights Under the *OSH Act*

Employer Responsibilities

If you are an employer, you **must**:

- Meet your general duty responsibility to provide a workplace free from recognized hazards;
- Keep workers informed about OSHA and safety and health matters with which they are involved;
- Comply, in a responsible manner, with standards, rules, and regulations issued under the *OSH Act*;
- Be familiar with mandatory OSHA standards;
- Make copies of standards available to employees for review upon request;
- Evaluate workplace conditions;
- Minimize or eliminate potential hazards;
- Provide employees safe, properly maintained tools and equipment, including appropriate personal protective equipment, and ensure that they use it;

- Warn employees of potential hazards;
- Establish or update operating procedures and communicate them to employees;
- Provide medical examinations when required;
- Provide training required by OSHA standards;
- Report within eight hours any accident that results in a fatality or the hospitalization of three or more employees;
- Keep OSHA-required records of work-related injuries and illnesses;
- Post a copy of OSHA 300A, Summary of Work-Related Injuries and Illnesses, for the previous year from February 1 to April 30;
- Post, at a prominent location within the workplace, the OSHA “It’s The Law” poster (OSHA 3165) informing employees of their rights and responsibilities;
- Provide employees, former employees, and their representatives access to the Log of Work-Related Occupational Injuries and Illnesses (OSHA 300) at a reasonable time and in a reasonable manner;
- Provide access to employee medical records and exposure records to the employee and others as required by law;
- Cooperate with OSHA compliance officers;
- Not discriminate against employees who properly exercise their rights under the *OSH Act*;
- Post OSHA citations and abatement verification notices at or near the worksite involved; and
- Abate cited violations within the prescribed period.

Employer Rights

If you are an employer, you have the right to:

- Seek free advice and on-site consultation;
- Be involved in job safety and health through your industry association;
- Request and receive proper identification of OSHA compliance officers;
- Be advised by the compliance officer of the reason for an inspection;
- Have an opening and closing conference with the compliance officer;
- Accompany the compliance officer on the inspection;
- File a notice of contest to dispute inspection results;
- Request an informal settlement agreement process after an inspection;
- Apply for a variance from a standard’s requirements when technical expertise and materials are unavailable and other means have been provided to protect employees;
- Take an active role in developing safety and health programs;
- Be assured of the confidentiality of any trade secrets;
- Submit a written request to the National Institute for Occupational Safety and Health (NIOSH) for information on whether any substance in your workplace has potentially toxic effects in the concentrations being used; and
- Submit information or comments to OSHA on the issuance, modification, or revocation of OSHA standards and request a public hearing.

In the event of a workplace emergency:

Call (800) 321-OSHA (6742) if there is a life-threatening situation. OSHA will refer callers immediately to the nearest OSHA area or state office if the state is a state-plan state.

For more information on any OSHA program, contact your nearest OSHA area or regional office listed on the website at www.osha.gov or by calling the toll-free number.

Employee Responsibilities

Employees are expected to comply with all applicable standards, rules, regulations, and orders issued under the *OSH Act*.

If you are an employee, you **should**:

- Read the OSHA “It’s The Law” poster (OSHA 3165) at the jobsite;
- Comply with all applicable OSHA standards;
- Follow all employer safety and health rules and regulations, and wear or use prescribed protective equipment while engaged in work;
- Report hazardous conditions to the supervisor;
- Report any job-related injury or illness to the employer, and seek treatment promptly;
- Cooperate with the OSHA compliance officer conducting an inspection; and
- Exercise your rights under the *OSH Act* in a responsible manner.

Employee Rights

If you are an employee, you have the right to:

- Review copies of appropriate OSHA standards, rules, regulations, and requirements that the employer should have available at the workplace;
- Request information from your employer on safety and health hazards, precautions, and emergency procedures;
- Receive adequate training and information;
- Request that OSHA investigate if you believe hazardous conditions or violations of standards exist in your workplace;
- Have your name withheld from your employer if you file a complaint;

- Be advised of OSHA actions regarding your complaint and have an informal review of any decision not to inspect or to issue a citation;
- Have your authorized employee representative accompany the OSHA compliance officer during an inspection;
- Respond to questions from the OSHA compliance officer;
- Observe any monitoring or measuring of hazardous materials and see any related monitoring or medical records;
- Review the Log and Summary of Work-Related Injuries and Illnesses (OSHA 300 and 300A) at a reasonable time and in a reasonable manner;
- Request a closing discussion following an inspection;
- Submit a written request to the National Institute for Occupational Safety and Health for information on whether any substance in your workplace has potentially toxic effects in the concentrations being used and have your name withheld from your employer;
- Object to the abatement period set in a citation issued to your employer;
- Participate in hearings conducted by the Occupational Safety and Health Review Commission;
- Be notified by your employer if he or she applies for a variance, and testify at a variance hearing and appeal the final decision; and
- Submit information or comments to OSHA on the issuance, modification, or revocation of OSHA standards and request a public hearing.

If your workplace is unsafe or unhealthful...

to file a complaint...

If your workplace has unsafe or unhealthful working conditions, often the best and fastest way to get it corrected is to notify your supervisor or employer. Employees also may file a complaint by phone, mail, email, or fax with the nearest OSHA office and request an inspection. You may request that OSHA not reveal your name. To file a complaint, call (800) 321-OSHA (6742) or contact the nearest OSHA regional, area, state plan, or consultation office listed at www.osha.gov.

The teletypewriter (TTY) number is (877) 889-5627.

You can also file a complaint online. Most online complaints are addressed by OSHA's phone/fax system. That means they may be resolved informally over the phone with your employer. Written, signed complaints submitted to OSHA area or state-plan offices are more likely to result in on-site OSHA inspections. Complaints from workers in OSHA-approved state-plan states will be forwarded to the appropriate state plan for response. If you are

concerned about confidentiality, you may prefer to file your complaint from your home computer or a computer in your local library.

Download the OSHA complaint form, complete it and then fax or mail it to your local OSHA office or you may simply contact your local OSHA office to receive a copy of the complaint form. Be sure to include your name, address, and telephone number so we can contact you. NOTE: To view and print the complaint form, you must have the Adobe Acrobat Reader on your computer.

to refuse unsafe work...

Refusing to do a job because of potentially unsafe workplace conditions is not ordinarily an employee right under the law and may result in disciplinary action by your employer. However, if you have reasonable grounds to believe that you are exposed to an imminent danger on the job, you do have the right to refuse to do a job. Remain at the job-site until the problem can be resolved because OSHA may not be able to protect you if you walk off the job.

For more information, visit the

Legal Protections

Additional employee protections

A number of different laws provide employees legal protections for getting involved in safety and health matters. The *OSH Act*, for example, provides employees the right to seek safe and healthful conditions on the job without fear of punishment. Under Section 11(c) of the act, employees may exercise such rights as:

- Voicing concerns to an employer, union, OSHA, any other government agency, or others about job safety or health hazards;
- Filing safety or health grievances;
- Participating in a workplace safety and health committee or in union activities concerning job safety and health;
- Participating in OSHA inspections, conferences, hearings, or other OSHA-related activities; and

- Refusing to work when a dangerous situation threatens death or serious injury where there is insufficient time to contact OSHA and where the employee has sought from his or her employer and been unable to obtain a correction of the dangerous conditions.

Protections against employer retaliation

An employer may not retaliate if an employee exercises these or any other rights under the *OSH Act*. This means that an employer may not take these actions against any worker who expresses concern or files a complaint about safety and health conditions or participates in job safety-related activities:

- Fire,
- Demote,
- Take away seniority or other earned benefits,
- Transfer to an undesirable job or shift, or
- Threaten or harass the worker.

Whistleblower protections

Since passage of the *OSH Act* in 1970, Congress has expanded OSHA's whistleblower protection authority to protect workers from discrimination under 14 federal statutes.

These statutes, and the number of days employees have to file a complaint, are:

- ***Occupational Safety and Health Act of 1970 (30 days)***

Provides discrimination protection for employees who exercise rights guaranteed under the act, such as filing a safety and health complaint with OSHA and participating in an inspection.

- ***Surface Transportation Assistance Act (180 days)***

Provides discrimination protections for truck drivers and other employees relating to the safety of commercial motor vehicles. Coverage includes all buses for hire and freight trucks with a gross vehicle weight greater than 10,001 pounds.

- ***Asbestos Hazard Emergency Response Act (90 days)***

Provides discrimination protection for individuals who report violations of environmental laws relating to asbestos in elementary and secondary school systems.

- ***International Safety Container Act (60 days)***

Provides discrimination protection for employees who report violations of the act, which regulates shipping containers.

- ***Energy Reorganization Act (180 days)***

Provides discrimination protection for employees of operators and subcontractors of nuclear power plants licensed by the Nuclear Regulatory Commission and for employees of contractors working under contract with the Department of Energy.

- ***Clean Air Act (30 days)***

Provides discrimination protection for employees who report violations of the act, which provides for the development and enforcement of standards regarding air quality and air pollution.

- ***Safe Drinking Water Act (30 days)***

Provides discrimination protection for employees who report violations of the act, which requires that all drinking water systems in public buildings and in new construction be lead free.

• **Federal Water Pollution Control Act (30 days)**

Provides discrimination protection for employees who report hazardous pollution of waters that provide a natural habitat for living things. Also called the Clean Water Act.

• **Toxic Substances Control Act (30 days)**

Provides discrimination protection for employees who report violations of regulations involving the manufacture, distribution, and use of certain toxic substances.

• **Solid Waste Disposal Act (30 days)**

Provides discrimination protection for employees who exercise certain rights under the act, which provides assistance for the development of facilities for the recovery of energy and other resources from discarded materials and regulates hazardous waste management. Also called the Resource Conservation and Recovery Act.

• **Comprehensive Environmental Response, Compensation, and Liability Act (30 days)**

Provides discrimination protection for employees who exercise rights under the act, which provides liability, compensation, cleanup, and emergency response for hazardous substances released into the environment and for the cleanup of inactive hazardous waste disposal sites.

• **Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (90 days)**

Provides discrimination protection for employees of air carriers, contractors, or subcontractors of air carriers who raise safety concerns.

• **Corporate and Criminal Fraud Accountability Act of 2002 (90 days)**

Provides discrimination protection for employees or contractors of publicly traded companies or brokerage firms who report mail, wire, bank, or securities fraud or violations of laws related to stockholder fraud. Also called the Sarbanes-Oxley Act.

• **Pipeline Safety Improvement Act of 2002 (180 days)**

Provides discrimination protection for employees who report violations of the federal law regarding pipeline safety and security or who refuse to violate such provisions.

Public-Sector Employees

Federal worker coverage

Section 19 of the *OSH Act* makes federal agency heads responsible for providing safe and healthful working conditions for their employees. OSHA conducts federal workplace inspections in response to employee reports of hazards.

The *OSH Act* also requires agencies to comply with standards consistent with those for private-sector employers. Under a 1998 amendment to the act, it covers the U.S. Postal Service the same as any private-sector employer.

OSHA's federal sector authority

In its federal sector authority, OSHA:

- Cannot propose monetary penalties against another federal agency for failure to comply with OSHA standards; and
- Does not have authority to protect federal employee "whistleblowers." The *Whistleblower Protection Act of 1989* allows present and former

To comply with the *OSH Act*, federal agencies must:

- Operate comprehensive safety and health programs,
- Record and analyze injury and illness data,
- Provide appropriate safety and health training to all employees, and
- Conduct inspections to ensure compliance with OSHA standards.

federal employees (except for corporations and certain intelligence agencies) to file their reports of reprisal with the Office of Special Counsel at the U.S. Merit Systems Protection Board. (For more information about whistleblower protections, see page 8.)

State and local government worker coverage

OSHA provisions cover the private sector only. However, some states have their own OSHA-approved occupational safety and health programs. These state programs must cover state and local workers and must be at least as effective as federal OSHA requirements. (For more information about state programs, see page 11.)

Advisory Groups

OSHA has several standing or ad hoc advisory committees that advise the agency on safety and health issues. These committees include representatives of management, labor, and state agencies as well as one or more designees of the Secretary of Health and Human Services (HHS). Members also may include representatives of occupational safety and health professions and the general public.

The two standing, or statutory, advisory committees are:

- The National Advisory Committee on Occupational Safety and Health (NACOSH), which

advises, consults with, and makes recommendations to the Secretaries of Labor and HHS on matters regarding administration of the *OSH Act*; and

- The Advisory Committee on Construction Safety and Health (ACCSH), which advises the Secretary of Labor on construction safety and health standards and other regulations.

Other continuing advisory committees include:

- The Federal Safety and Health Advisory Committee (FACOSH), which advises the Secretary of Labor on all aspects of federal agency safety and health;
- The Maritime Advisory Committee for Occupational Safety and Health (MACOSH), which advises the Secretary of Labor on workplace safety and health programs, policies, and standards in the maritime industry; and
- The National Advisory Committee on Ergonomics, which advises OSHA on initiatives to reduce ergonomic-related injuries and illnesses in the workplace.

OSHA may occasionally form short-term advisory committees to advise the agency on specific issues.

State Programs

State safety and health programs

State plans are OSHA-approved job safety and health programs operated by individual states instead of federal OSHA. The *OSH Act* encourages states to develop and operate their own job safety and health plans and precludes state enforcement of OSHA standards unless the state has an approved plan. OSHA approves and monitors all state plans.

Once a state plan is approved under Section 18(b) of the *OSH Act*, OSHA funds up to 50 percent of the program's operating costs. State plans must provide standards and enforcement programs as well as voluntary compliance activities that are at least as effective as the federal program.

State plans covering the private sector also must cover state and local government employees. OSHA rules also permit states to develop plans that cover only public sector (state and local government) employees. In these cases, private sector employment remains under federal OSHA jurisdiction. Twenty-three states operate complete plans and three cover only the public sector. These states are listed on the OSHA website at www.osha.gov.

OSHA approval for state plans

To gain OSHA approval as a “developmental plan,” the first step in the state plan approval process, a state must have adequate legislative authority and

must demonstrate that within three years it will provide standards-setting, enforcement, and appeals procedures; public employee protection; a sufficient number of competent enforcement personnel; and training, education, and technical assistance programs.

In states with approved plans, OSHA generally limits its enforcement activity to areas not covered by the state and suspends all concurrent federal enforcement.

Once the state is operating at least as effectively as federal OSHA and meets other requirements, OSHA grants final approval of the plan and ceases federal authority in those areas over which the state has jurisdiction.

State program coverage

States with approved plans cover most private sector employees as well as state and local government workers in the state. Federal OSHA continues to cover federal employees and certain other employees specifically excluded by a state plan—for example, those who work in maritime industries and on military bases.

State workplace inspections

States with approved state plans respond to accidents and workplace complaints and conduct random unannounced inspections, just like federal OSHA. The states issue citations and proposed penalties under state law and adjudicate disputes through a state review board or other procedure.

State Programs



Federal monitoring of state plans

Federal OSHA closely monitors state programs. Anyone finding inadequacies or other problems in the administration of a state program may file a Complaint About State Program Administration (CASPA) with the appropriate OSHA regional administrator. OSHA investigates all these complaints and, where they are found to be valid, requires appropriate corrective action.

Employer rights and responsibilities

State plans must guarantee the same employer and employee rights as OSHA. Employer and employee responsibilities in states with their own occupational safety and health programs are generally the same as in states under federal OSHA.

State safety and health standards

State safety and health standards under approved plans must be identical to or at least as effective as federal OSHA standards and must keep pace with federal standards. State plans must adopt standards comparable to federal standards within six months after a federal standard takes effect. Most state plan standards are very similar to federal standards, but states with approved plans may have different and independent standards.

To find out if your state operates an OSHA-approved state program, visit www.osha.gov.

Standards & Guidance

Requirements

In general, standards require that employers:

- Maintain conditions or adopt practices reasonably necessary and appropriate to protect workers on the job;
- Be familiar with and comply with standards applicable to their establishments; and
- Ensure that employees have and use personal protective equipment when required for safety and health.

Hazards addressed

OSHA issues standards for a wide variety of workplace hazards, including:

- Toxic substances,
- Harmful physical agents,
- Electrical hazards,
- Fall hazards,
- Trenching hazards,
- Hazardous waste,
- Infectious diseases,
- Fire and explosion hazards,
- Dangerous atmospheres, and
- Machine hazards.

In addition, where there are no specific OSHA standards, employers must comply with the *OSH Act's* “general duty clause.” The general duty clause, Section 5(a)(1) requires that each employer “furnish ... a place of employment which is free from recognized hazards that are causing or are likely to cause death or serious physical harm to employees.”

The Standards-Setting Process

Deciding to develop a standard

OSHA can begin standards-setting procedures on its own initiative or in response to petitions from other parties, including:

- The Secretary of Health and Human Services (HHS);
- The National Institute for Occupational Safety and Health (NIOSH);
- State and local governments;
- Nationally recognized standards-producing organizations and employer or labor representatives; and
- Any other interested parties.

Each spring and fall, the Department of Labor publishes in the *Federal Register* a list of all regulations that have work under way. The *Regulatory Agenda* provides a schedule for the development of standards and regulations so employers, employees, and other interested parties know when they can be expected.

How OSHA develops standards

OSHA publishes its intention to propose, amend, or revoke a standard in the *Federal Register*, either as:

- A Request for Information or an Advance Notice of Proposed Rulemaking or announcement of a meeting to solicit information to be used in drafting a proposal; or
- A Notice of Proposed Rulemaking, which sets out the proposed new rule's requirements and provides a specific time for the public to respond.

Interested parties may submit written information and evidence. OSHA also may schedule a public hearing to consider various points of view.

After reviewing public comments, evidence, and testimony, OSHA publishes:

- The full text of any standard amended or adopted and the date it becomes effective, along with an explanation of the standard and the reasons for implementing it; or
- A determination that no standard or amendment is necessary.

Input from other government agencies

Other government agencies, such as NIOSH, can recommend standards to OSHA. The *OSH Act* established the National Institute for Occupational Safety and Health under the Department of HHS as the research agency for occupational safety and health. NIOSH conducts research on various safety and health problems, provides technical assistance to OSHA, and recommends standards for OSHA's adoption. (For more information, call (800) 35-NIOSH or visit the agency's website at www.cdc.gov/niosh.)

Emergency temporary standards

Under certain limited conditions, OSHA can set emergency temporary standards that take effect immediately and remain in effect until superseded by a permanent standard. To take such an action, OSHA must determine that:

- Workers are in grave danger due to exposure to substances or agents determined to be toxic or physically harmful or to new hazards; and
- An emergency standard is necessary to protect them.

OSHA then publishes the emergency temporary standard in the *Federal Register*, where it also serves as a proposed permanent standard. The usual procedures for adopting a permanent standard apply, except that a final ruling should be made within six months.

Congressional jurisdiction over OSHA standards

OSHA submits all final rules to Congress and the General Accounting Office for review. Congress has the authority to repeal a standard by passing a joint resolution under an expedited procedure established by the *Small Business Regulatory Enforcement and Fairness Act*, or *SBREFA*, but has done so only once. For the repeal to take effect, the joint resolution must be signed by the President.

Employer recourse

An employer who is unable to comply with new requirements or anyone who disagrees with a new standard can:

- Petition a court for judicial review;
- Request a permanent, temporary, or experimental variance from a standard or regulation; or
- Apply for an interim order to continue working under existing conditions while OSHA considers a variance request.

Petitions to modify or withdraw standards or requirements

Employers or employees may petition OSHA to modify or revoke standards just as they may petition the agency to develop standards. OSHA continually

reviews its standards to keep pace with developing and changing industrial technology.

Filing a petition for judicial review

Anyone who may be adversely affected by a final or emergency standard may file a petition for judicial review. The objecting party must file the petition within 60 days of the rule's publication with the U.S. Court of Appeals for the circuit in which the petitioner lives or has his or her primary place of business.

Filing an appeals petition will not delay enforcement of a standard, unless the Court of Appeals specifically orders it. OSHA issues permanent standards only after careful consideration of the arguments and data received from the public in written submissions and at hearings.

Guidelines versus standards

A guideline is a tool to assist employers in recognizing and controlling hazards. It is voluntary and not enforceable under the *OSH Act*. Failure to implement a guideline is not itself a violation of the *OSH Act's* general duty clause.

Guidelines are more flexible than standards. They can be developed quickly and can be changed easily as new information becomes available with scientific advances. Guidelines make it easier for employers to adopt innovative programs to suit their workplaces, rather than inflexible, one-size-fits-all solutions to issues that may be unique to an industry or facility.

Variations

A variance grants an employer formal permission to deviate from a standard's requirements or time frame.

Employer requests for variances

Employers may ask OSHA for a variance from:

- A newly promulgated standard or regulation if they cannot fully comply by the effective date due to shortage of materials, equipment, or professional or technical personnel; or
- Requirements of a standard or regulation if they can demonstrate that their alternative or alternatives provide employees with protection as effective as that provided by the standard or regulation.

Types of variances

An employer applies for a **temporary variance** if he or she cannot comply with a standard or regulation by its effective date because professional or technical personnel, material, or equipment are not available, or because the necessary construction or alteration of facilities cannot be completed in time. While operating under a temporary variance, an employer generally must meet specific conditions specified by OSHA.

An employer who can prove that working conditions, practices, means, methods, operations, or processes at his or her worksite are as safe and healthful as they would be if the employer complied with the standard may apply for a **permanent variance**. Pending OSHA approval to grant a permanent variance, an employer must comply with the OSHA standard.

An employer may apply for an **experimental variance** if he or she is participating in an effort to demonstrate or validate new job safety and health techniques, and either the Secretary of Labor or the Secretary of HHS has approved that experiment.

Impact of variance applications on citations

Variances are not retroactive. An employer who has been cited for violating a standard may not seek relief from that citation by applying for a variance.

The fact that a citation is outstanding does not prevent an employer from filing a variance application. However, if the citation is being contested by the employer, the OSHA Administrator has the option to decline to accept the variance application for the provision(s) under contest.

For more information about variances

For further information and help in applying for a variance, contact the nearest OSHA office listed on the agency website at www.osha.gov or by calling (800) 321-OSHA (6742).

Reporting

OSHA's reporting requirements

All employers must report to OSHA within eight hours of learning about:

- The death of any employee from a work-related incident, and
- The in-patient hospitalization of three or more employees as a result of a work-related incident.

In addition, employers must report all fatal heart attacks. Deaths from motor vehicle accidents on public streets (except those in a construction work zone) and in accidents on commercial airplanes, trains, subways or buses do not need to be reported.

These reports may be made by telephone or in person to the nearest OSHA area office listed at www.osha.gov or by calling OSHA's toll-free number, (800) 321-OSHA (6742).

Employers may be subject to other requirements in other OSHA standards as well.

Recordkeeping

Benefits

OSHA's recordkeeping requirements, as set out in the *OSH Act*, established an effective, centralized, nationwide system for monitoring occupational safety and health problems—a vital requirement for gauging problems and solving them. Keeping records allows OSHA to compile survey material, helps identify high-hazard industries, and informs employees about their employers' workplace safety record. These records also help employers identify potential sources of injuries and illnesses at their worksites.

Employer requirements

OSHA's reporting and recordkeeping regulations require employers to:

- Maintain records in each establishment of occupational injuries and illnesses as they occur and make those records accessible to employees;

- Keep injury and illness records and post from February 1 through April 30 an annual summary of occupational injuries and illnesses for each establishment. A company executive must certify the accuracy of the summary;
- Record any fatality regardless of the length of time between the injury and death;
- Provide, upon request, pertinent injury and illness records for inspection and copying by any representative of the Secretaries of Labor or HHS, or the state during any investigation, research, or statistical compilation;
- Comply with any additional recordkeeping and reporting requirements in specific OSHA standards.

Exempt employers

Employers with 10 or fewer employees are exempt from maintaining the OSHA log of injuries and illnesses unless the Bureau of Labor Statistics (BLS) or OSHA notifies them that they have been selected to participate in a mandatory data collection.

OSHA also exempts employers in certain low-hazard industries such as real estate agencies and clothing stores, as defined in the recordkeeping standard. Exempt employers must still comply with requirements to display an OSHA “It’s The Law” poster (OSHA 3165) and report to OSHA within eight hours any accident that results in one or more fatalities or the hospitalization of three or more employees.

A few exempt employers will have to maintain records if OSHA or BLS selects them to participate in a

mandatory data collection. The agency will notify those employers in advance and supply them the necessary forms and instructions.

What cases to record

To determine which work-related injuries and illnesses must be recorded, consult the decision tree on page 18.

Exceptions to the recording requirements

To be considered work-related, there must be a significant degree of aggravation to a preexisting injury or illness. In addition, cases arising from eating food and drinking beverages, blood donations, and exercise programs do not need to be recorded. Common cold and flu cases also do not need to be recorded. There are specific criteria for determining when mental illnesses are considered work-related and when cases should be recorded if employees are traveling or working at home. For more information, visit www.osha.gov.

Maintaining recordkeeping forms

Employers must log injuries and illnesses on recordkeeping forms, keep the logs current and retain them for five years at each establishment. Logs must be available for inspection by representatives of OSHA, HHS, BLS, or the designated state agency within four hours of the request. Employers are required to update logs to reflect any changes that occur.

Do not send any recordkeeping forms to OSHA or any other agency. The employer maintains forms and posts the annual summary in the workplace. If OSHA inspects the workplace, the employer will be required to produce the forms.

Reporting and Recordkeeping Requirements

OSHA recordkeeping regulations require many employers to maintain records of workplace injuries, illness, and deaths. Employers must:

- Maintain injury and illness records,
- Report all fatalities,
- Report each accident that hospitalizes three or more employees,
- Make records accessible to employees,
- Allow OSHA access to records, and
- Post an annual summary of injuries and illnesses.

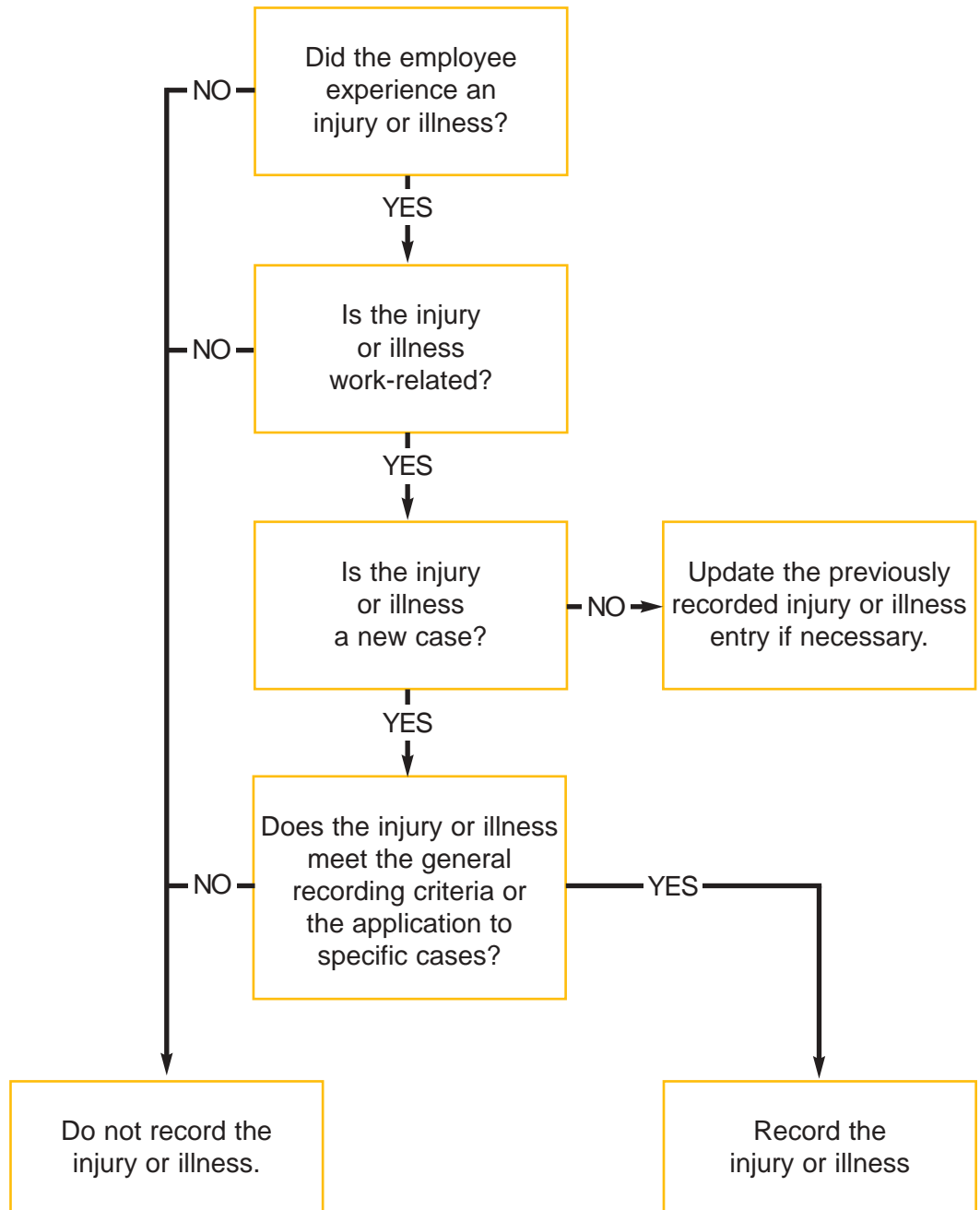
Determining if an injury or illness is work-related

An employer must consider an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a preexisting injury or illness. Most injuries and illnesses

resulting from events or exposures in the work environment are presumed to be work-related.

Employers with multiple worksites

Employers must keep injury and illness records for each establishment. OSHA defines an establishment as a “single



physical location where business is conducted or where services are performed.”

An employer whose employees work in dispersed locations must keep records at the place where the employees report for

work. In some situations, employees do not report to work at the same place each day. In that case, records must be kept at the place from which they are paid or at the base from which they operate.

Industries Partially Exempt from OSHA Recordkeeping Requirements*

SIC Code	Industry Description	SIC Code	Industry Description
525	Hardware Stores	725	Shoe Repair and Shoeshine Parlors
542	Meat and Fish Markets	726	Funeral Service and Crematories
544	Candy, Nut, and Confectionery Stores	729	Miscellaneous Personal Services
545	Dairy Products Stores	731	Advertising Services
546	Retail Bakeries	732	Credit Reporting and Collection Services
549	Miscellaneous Food Stores	733	Mailing, Reproduction, and Stenographic Services
551	New and Used Car Dealers	737	Computer and Data Processing Services
552	Used Car Dealers	738	Miscellaneous Business Services
554	Gasoline Service Stations	764	Reupholstery and Furniture Repair
557	Motorcycle Dealers	78	Motion Picture
56	Apparel and Accessory Stores	791	Dance Studios, Schools, and Halls
573	Radio, Television, & Computer Stores	792	Producers, Orchestras, Entertainers
58	Eating and Drinking Places	793	Bowling Centers
591	Drug Stores and Proprietary Stores	801	Offices and Clinics Of Medical Doctors
592	Liquor Stores	802	Offices and Clinics Of Dentists
594	Miscellaneous Shopping Goods Stores	803	Offices Of Osteopathic Physicians
599	Retail Stores, Not Elsewhere Classified	804	Offices Of Other Health Practitioners
60	Depository Institutions (banks and savings institutions)	807	Medical and Dental Laboratories
61	Nondepository Institutions (credit institutions)	809	Health and Allied Services, Not Elsewhere Classified
62	Security and Commodity Brokers	81	Legal Services
63	Insurance Carriers	82	Educational Services (schools, colleges, universities and libraries)
64	Insurance Agents, Brokers, and Services	832	Individual and Family Services
653	Real Estate Agents and Managers	835	Child Day Care Services
654	Title Abstract Offices	839	Social Services, Not Elsewhere Classified
67	Holding and Other Investment Offices	841	Museums and Art Galleries
722	Photographic Studios, Portrait	86	Membership Organizations
723	Beauty Shops	87	Engineering, Accounting, Research, Management, and Related Service
724	Barber Shops	899	Services, Not Elsewhere Classified

*The Bureau of Labor Statistics is in the process of converting its industry-specific data from Standard Industrial Classification (SIC) codes to the North American Industry Classification System (NAICS). In the future, OSHA will change its classifications from SIC to NAICS codes.

Information
Employers
Must Post

Employers must display at each establishment, wherever they normally post notices to employees, the following:

- A copy of the totals from the previous year's summary of occupational injuries and illnesses, OSHA 300A (February through April);
- OSHA "It's The Law" poster (OSHA 3156), or the state equivalent, informing employees of their rights and responsibilities under the *OSH Act*;
- Summaries of petitions for variances from standards of recordkeeping procedures; and
- Copies of all OSHA citations for violations of standards. These must remain posted at or near the location of alleged violations for three days, or until the violations are corrected, whichever is longer.

www.osha.gov

Recordkeeping forms

Three forms are needed for recordkeeping:

- **OSHA 300, Log of Work-Related Injuries and Illnesses**

Employers must log each recordable occupational injury and illness on this form within six working days from the time the employer learns of it. A complete copy current to within 45 calendar days must be present at all times in the establishment if the employer prepares the log at a central location using automatic data processing equipment. A substitute for the OSHA 300 is acceptable if it is as detailed, readable, and understandable as the OSHA 300.

- **OSHA 301, Injury and Illness Incident Report.**

Each employer must complete the OSHA 301 form within seven calendar days from the time the employer learns of the work-related injury or illness. This form includes more data about how the injury or illness occurred.

Employees and former employees are guaranteed access to their individual OSHA 301 forms. Employee representatives will be provided access to the "information about the case" section of the OSHA 301 form in establishments where they represent employees.

- **OSHA Form 300A, Summary of Work-Related Injuries and Illnesses.**

This form was created to make it easier to post and calculate incident rates. Employers must post copies of the previous year's records no later than February 1 and keep them in place through April 30.

Recording zero injuries or illnesses

If there were no injuries or illnesses during the year, employers must enter "zero" on the totals line of the form and post it. The form must be signed and certified by a company executive.

Employee privacy

Employers must withhold the names of individuals with sensitive injuries such as sexual assaults, HIV infections, and mental illness.

OSHA's annual survey

Each year, OSHA collects injury and illness information from employers through the OSHA Data Initiative to better direct agency resources and improve worker protections. All employers in construction and manufacturing with 40 or more employees are eligible to be included in the initiative. In addition, employers from 67 other industries in other industrial sectors are selected, generally if they are in industries rated as "high hazard" or with high injury and illness rates. Establishments are selected for inclusion in the annual survey based on previous reported injury and illness rates, an OSHA intervention, or the periodic revisiting of former participants in the annual survey.

OSHA asks employers selected for participation to send information already collected on the 300A summary form, required by the OSHA occupational injury and illness recordkeeping regulation.

Programs & Services

How OSHA carries out its mission

OSHA conducts a broad range of programs and activities to promote workplace safety and health and protect the nation's workers. These programs and activities are based on three strategies:

- Strong, fair, and effective enforcement;
- Outreach, education, and compliance assistance; and
- Partnerships and other cooperative programs.

Strong, Fair, and Effective Enforcement

Compliance officer authority

The *OSH Act* authorizes OSHA compliance officers—at reasonable times, in a reasonable manner, and within reasonable time limits—to:

- Enter any factory, plant, establishment, construction site, or other areas of the workplace or environment where work is being performed;
- Inspect and investigate during regular working hours any such place of employment and all pertinent conditions, structures, machines, apparatus, devices, equipment, and materials;
- Inspect and investigate at other times any such place of employment and all pertinent conditions, structures, machines, apparatus, devices, equipment, and materials; and
- Question privately any employer, owner, operator, agent or employee during an inspection or investigation.

Compliance officer qualifications

OSHA compliance officers have specialized knowledge and experience in the occupational safety and health field, including industrial hygiene, safety engineering, toxicology, and occupational medicine. They receive vigorous training on OSHA standards and how to recognize safety and health hazards. Many staff members have specialized credentials such as certified industrial hygienist (CIH) or certified safety professional (CSP) certifications.

Advance notice of inspections

OSHA generally conducts inspections without advance notice. In fact, anyone who alerts an employer in advance of an OSHA inspection can receive a criminal fine of up to \$1,000 or a six-month jail term or both.

However, under special circumstances, OSHA may give the employer advance notice of an inspection—but no more than 24 hours. These special circumstances include:

- Imminent danger situations, which require correction immediately;
- Inspections that must take place after regular business hours or require special preparation;
- Cases where OSHA must provide advance notice to assure that the employer and employee representative or other personnel will be present; and
- Situations in which OSHA determines that advance notice would produce a more thorough or effective inspection.

The *OSH Act* authorizes OSHA to conduct workplace inspections to enforce its standards. Every establishment covered by the *OSH Act* is subject to inspection by OSHA compliance safety and health officers.

Employers receiving advance notice of an inspection must inform their employees' representative or arrange for OSHA to do so.

Search warrants

An employer has the right to require the compliance officer to obtain an inspection warrant before entering the worksite. OSHA may inspect after acquiring a judicially authorized search warrant based on administrative probable cause or evidence of a violation.

OSHA may take appropriate steps, including legal action, if an employer still refuses to admit a compliance officer, or if an employer attempts to interfere with an inspection.

Inspection priorities

OSHA cannot inspect all 7 million workplaces covered by the *OSH Act* each year. The most hazardous workplaces need primary attention. OSHA, therefore, has established a system of inspection priorities in order to make the most positive impact on occupational safety and health. The agency inspects under the following conditions:

Imminent danger, or any condition where there is reasonable certainty that a danger exists that can be expected to cause death or serious physical harm immediately or before the danger can be eliminated through normal enforcement procedures. OSHA gives top priority to imminent danger situations.

Catastrophes and fatal accidents resulting in the death of any employee or the hospitalization of three or more employees.

Employee complaints involving imminent danger or an employer violation that threatens death or serious physical harm. (For more information about complaint procedures and employee rights, see pages 6 and 7.)

Referrals from other individuals, agencies, organizations, or the media.

Planned, or programmed, inspections in industries with a high number of hazards and associated injuries.

Follow-ups to previous inspections.

The Inspection Process – Off-site Investigations

“Phone/fax” investigations

There are two ways that OSHA can respond to a complaint. OSHA can either perform an on-site inspection or an off-site investigation, also known as a “phone/fax investigation.”

Although every worker has a right to receive an on-site inspection if certain conditions are met, there are times when a phone/fax (or letter) investigation may be a better alternative. OSHA responds more quickly to lower-priority hazards using a phone/fax approach. This enables the agency to concentrate resources on the most serious workplace hazards. Employees who request a phone/fax investigation do not give up the right to request an on-site inspection of potential violations and hazards if they are not satisfied with the investigation. Workers should call their nearest OSHA area office to discuss their options.

If an off-site investigation is appropriate, the agency telephones the employer,

describes the alleged hazards, and then follows up with a fax or letter. The employer must respond in writing within five days, identifying any problems found and noting corrective actions taken or planned. If the response is adequate, OSHA generally will not conduct an inspection. The employee or employee representative who filed the original complaint will receive a copy of the employer's response and, if still not satisfied, may then request an on-site inspection.

If the employee or employee representative files a written complaint that meets certain conditions, then OSHA may conduct an on-site inspection. Those conditions include claims of serious physical harm that have already resulted in disabling injuries or illnesses or claims of imminent danger situations; written, signed complaints requesting inspections; and situations where the employer provided an inadequate response to a phone/fax investigation.

The Inspection Process – On-site Inspections

What to expect

A typical OSHA inspection includes four stages:

- Presentation of inspector credentials;
- Opening conference;
- Inspection walkaround; and
- Closing conference.

How an inspection begins

When arriving at a worksite, the OSHA compliance officer displays official credentials and asks to meet an appropriate employer representative. Employers should always insist on

seeing the compliance officer's credentials.

An OSHA compliance officer carries U.S. Department of Labor credentials bearing his or her photograph and a serial number that an employer can verify by phoning the nearest OSHA office. Posing as a compliance officer is a violation of law; suspected imposters should be promptly reported to local law enforcement agencies.

Opening conference

In the opening conference, the compliance officer:

- Explains why OSHA selected the establishment for inspection;
- Obtains information about the establishment;
- Explains the purpose of the visit, the scope of the inspection, walkaround procedures, employee representation, employee interviews, and the closing conference; and
- Determines whether an OSHA-funded consultation is in progress or whether the facility has received an inspection exemption. If so, the compliance officer usually terminates the inspection.

The compliance officer asks the employer to select an employer representative to accompany him or her during the inspection. OSHA welcomes, but does not require, an employee representative to accompany the inspector.

Under no circumstances may the employer select the employee representative for the walkaround. OSHA does, however, encourage employers and employees to meet together.

Inspection walkaround

After the opening conference, the compliance officer and accompanying representatives proceed through the establishment, inspecting work areas for potentially hazardous working conditions. The compliance officer will discuss possible corrective actions with the employer. OSHA may consult, at times privately, with employees during the inspection walkaround.

An inspection walkaround may cover only part of an establishment, particularly if the inspection resulted from a specific complaint, fatality, or catastrophe or is part of a local or national emphasis program. Other inspections may cover the entire facility, “wall to wall.”

Trade secrets observed by the compliance officers are kept confidential. Federal employees who release

confidential information without authorization are subject to a \$1,000 fine, one year in jail, or both, and removal from office or employment.

Records reviews

The compliance officer checks posting and recordkeeping practices, including whether the employer has:

- Maintained records of deaths, injuries, and illnesses;
- Posted OSHA’s Summary of Work-Related Injuries and Illnesses (OSHA 300A) from February 1 to April 30; and
- Prominently displayed the OSHA “It’s The Law” poster (OSHA 3165).

The compliance officer also examines records, where required, of employee exposure to toxic substances and harmful physical agents.

Selecting employee representatives

If ...	Then ...
the employees are represented by a recognized bargaining representative,	the union usually will designate the employee representative to accompany the compliance officer.
there is a plant safety committee and no recognized bargaining representative,	the employee members of that committee or the employees at large will designate the employee representative.
there is neither a recognized bargaining representative nor a plant safety committee,	the employees themselves may select the employee representative, or the compliance officer will determine if any other employees would suitably represent the interests of employees.
there is no authorized employee representative,	the compliance officer must consult with a reasonable number of employees concerning safety and health matters in the workplace. Such consultations may be held privately.

On-the-spot corrections

Some apparent violations detected by the compliance officer can be corrected immediately. The compliance officer records such corrections to help evaluate the employer's good faith for compliance.

Apparent violations that have been corrected may still serve as the basis for a citation or notice of proposed penalty or both.

After the walkaround

After the inspection walkaround, the compliance officer holds a closing conference with the employer and the employee representatives, either jointly or separately.

During the closing conference, the compliance officer:

- Discusses with the employer all unsafe or unhealthful conditions observed on the inspection and indicates all apparent violations for which a citation may be recommended;
- Tells the employer of his or her appeal rights, anti-discrimination rights under 11(c) of the *OSH Act*, and procedures for contesting citations within 15 working days after receiving the citation; and
- Informs the employer of his or her obligations regarding any citations that may be issued.

The compliance officer will hold a separate closing conference with the employees or their representative, if requested, to discuss matters of direct interest to employees and to inform them of their rights after an inspection.

Information in an OSHA citation

Citations inform the employer and employees of:

- Regulations and standards the employer allegedly violated;
- Any hazardous working conditions covered by the *OSH Act's* general duty clause;
- The proposed length of time set for abatement of hazards; and
- Any proposed penalties.

Additional information provided

The compliance officer:

- Informs employers of their rights under the *Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA)*. *SBREFA* requires that all federal agencies have in place a policy to reduce or, under appropriate circumstances, waive penalties for violations of standards by small businesses;
- Informs employers that Regional Small Business Regulatory Fairness Boards created under *SBREFA* exist to hear cases if employers are not satisfied with agency resolutions of enforcement matters;
- Explains that OSHA area offices offer assistance and can answer questions about programs and activities.

Disclosures of penalties

Only the OSHA area director has the authority to tell the employer what penalties the agency will propose. OSHA has up to six months following an inspection to issue a final report. After reviewing the full inspection report, the OSHA area director will:

- Issue citations without penalties;

- Issue citations with proposed penalties; or
- Determine that neither are warranted.

Violations and Penalties

Types of penalties

Under the *OSH Act*, OSHA may cite the following violations and propose the following penalties:

- **Other-than-Serious:** A violation that has a direct relationship to job safety and health, but probably would not cause death or serious physical harm. OSHA may propose a penalty of up to \$7,000 for each other-than-serious violation.
- **Serious:** A violation where there is substantial probability that death or serious physical harm could result and that the employer knew, or should have known, of the hazard. OSHA may propose a mandatory penalty of up to \$7,000 for each serious violation.
- **Willful:** A violation that the employer intentionally and knowingly commits or a violation that the employer commits with plain indifference to the law. The employer either knows that what he or she is doing constitutes a violation, or is aware that a hazardous condition existed and made no reasonable effort to eliminate it. OSHA may propose penalties of up to \$70,000 for each willful violation, with a minimum penalty of \$5,000 for each willful violation.

In addition to OSHA citations and penalties, the U.S. Department of Justice may bring a criminal action against an employer whose willful violation of a standard results in the death of an employee. If a court convicts such an employ-

er, the offense is punishable by a court-imposed fine or by imprisonment for up to six months, or both. The court may impose a fine for a criminal conviction of up to \$250,000 for an individual or \$500,000 for a corporation.

- **Repeated:** A violation of any standard, regulation, rule, or order where OSHA finds a substantially similar violation during a reinspection. OSHA may propose penalties of up to \$70,000 for each repeated violation. To be the basis of a repeat citation, the original citation must be final. A citation under contest may not serve as the basis for a subsequent repeat citation.
- **Failure to Abate:** OSHA may propose an additional penalty of up to \$7,000 for **each day** an employer fails to correct a previously cited violation beyond the prescribed abatement date.

Penalties for other violations

Employers may be assessed penalties for:

- Violating posting requirements can bring a civil penalty of up to \$7,000. (OSHA does not fine for failing to post the “It’s The Law” poster (OSHA 3165);)
- Falsifying records, reports, or applications, upon conviction in a court, can bring a criminal fine of \$10,000 or up to six months in jail, or both;
- Assaulting a compliance officer or otherwise resisting, opposing, intimidating or interfering with a compliance officer in the performance of his or her duties is a criminal offense. Anyone convicted of such an action is subject to a criminal fine of not

more than \$5,000 and imprisonment for not more than three years.

Adjustments to proposed penalty amounts

The agency may adjust a penalty downward depending on the employer’s good faith (demonstrated efforts to comply with the *OSH Act*), history of previous violations, and size of business. When the adjusted penalty amounts to less than \$100, OSHA does not propose any penalty. For serious violations, OSHA may also reduce the proposed penalty based on the gravity of the alleged violation. No good faith adjustment will be made for alleged willful violations.

Criminal penalties

An employer who is convicted in a criminal proceeding of a willful violation of a standard that has resulted in the death of an employee may be fined up to \$250,000 (or \$500,000 if

the employer is a corporation) or imprisoned up to six months, or both. A second conviction doubles the possible term of imprisonment.

Contesting Inspection Results

Employee questions regarding inspection results

Employees may request an informal conference with OSHA to discuss any issues raised by an inspection, citation, notice of proposed penalty, or employer’s notice of intent to contest. OSHA must conduct an informal conference within the 15 working day contest period. In addition, if OSHA initiated an inspection due to an employee complaint, the employee or authorized employee representative may request an informal review of any decision not to issue a citation.

Employees may contest:

- The time specified in the citation for abatement of a hazardous condition; and

Violation Categories and Possible Penalties

<i>Type of Violation</i>	<i>Minimum Penalty Per Violation</i>	<i>Maximum Penalty Per Violation</i>
Other-than-serious		\$7,000
Serious	\$100*	\$7,000
Posting		\$7,000
Willful	\$5,000	\$70,000
Willful, with fatality, first conviction		\$250,000/\$500,000 or six months in prison or both **
Willful, with fatality, second conviction		\$250,000/\$500,000 or one year in prison or both **
Repeated	\$5,000	\$70,000
Failure to abate		\$7,000 per day

* Set as OSHA policy in the Field Inspection Reference Manual (FIRM)

** The monetary criminal fine is set by *Title 18 of the U.S. Code* (Crimes and Criminal Procedure), Section 3571, which states that individuals found guilty of an offense may not be fined more than \$250,000, and organizations not more than \$500,000.

- An employer's petition for modification of abatement (PMA) requesting an extension of the abatement period. Employees must contest the PMA within 10 working days of its posting or within 10 working days after an authorized employee representative has received a copy.

Employees, however, may not contest citations, penalties, or lack of penalties.

Employer appeals of inspection results

When issued a citation or notice of a proposed penalty, an employer may request an informal conference with OSHA's area director to discuss the case. OSHA authorizes its area directors to reach settlement agreements with employers that adjust citations and penalties to avoid prolonged legal disputes. As with informal conferences requested by employees, OSHA must conduct an informal conference requested by an employer within the 15-working-day contest period.

Petitions for modification of abatement

If an employer who has been cited for violations cannot meet the abatement dates as issued or amended at the informal conference, the employer must submit a request for an extension of time. This is called a petition for modification of abatement, or PMA. A PMA must be filed in writing with the area director who issued the citation no later than the close of the next working day following the date the director originally set for abatement.

Notices of contest

If an employer decides to contest the citation, the time set for abatement, and/or the proposed penalty, he or she has 15 working days after receiving the citation and notice of proposed penalty to notify the OSHA area director in writing. An oral disagreement is not sufficient. This written notification is called a notice of contest.

Any employer, employee, or employee representative also may request an informal conference within the 15 working day contest period to discuss inspection results. Based on information and evidence presented at the informal conference, OSHA may enter into an informal settlement agreement with the employer, which could involve changes to citations, penalties, or abatement dates.

There is no specific format for the notice of contest. It must, however, clearly identify the employer's basis for filing a contest of the citation, notice of proposed penalty, abatement period, or notification of failure to correct the violation.

Reviews of notices of contest

If the written notice of contest has been filed within the required 15 working days, the OSHA area director forwards it to the Occupational Safety and Health Review Commission (OSHRC). The commission is an independent federal agency created by the *OSH Act* to decide contested OSHA citations and penalties. It is not associated with OSHA or the Department of Labor.

The commission will assign an administrative law judge to hear the case. The administrative law judge may:

- Find the contest legally invalid and disallow it, or
- Set a hearing for a public place near the employer's workplace.

The employer and the employees have the right to participate in the hearing.

Employer appeals of administrative judge rulings

Once the administrative law judge has ruled, any party to the case may request a further review by the commission. Any of the three OSHRC commissioners also may, at his or her own motion, bring a case before the commission for review. Employers and OSHA may appeal commission rulings to the appropriate U.S. Court of Appeals.

Outreach, Education, and Compliance Assistance

Outreach materials on OSHA's website

OSHA's website provides extensive information about the agency as well as standards, interpretations, directives, technical advisors, compliance assistance, and additional information. The site also includes eTools—interactive software—such as Expert Advisors and Electronic Compliance Assistance Tools, information on specific health and safety topics, regulations, directives, videos, and other information for employers and employees. The address is www.osha.gov.

OSHA also produces *QuickTakes*, a bimonthly e-news memo filled with timely information, updates, and results from OSHA about safety and health in

America's workplaces. Subscriptions are free; just click on the agency website at www.osha.gov.

In addition, OSHA's website includes several special features:

- Spanish-language pages that provide workplace safety and health information in Spanish;
- A Small Business page, designed to increase awareness among small business owners about their responsibilities under the *OSH Act*, and resources to help them;
- A Workers' page that explains workers' rights and responsibilities under the *OSH Act*; and
- A Teen Workers page that addresses safety and health issues for workers under age 18.

These and other web-based resources are available at www.osha.gov.

Compliance assistance materials

OSHA has an extensive publications program. The agency publishes booklets and fact sheets detailing various facets of OSHA policy and regulations. These include numerous publications on regulatory topics such as hazard communication, asbestos, and blood-borne pathogens, and on programs such as consultation, voluntary protection, grants, and training and education. The agency also publishes guidance documents, such as guidelines on ergonomics for specific industries and recommendations for addressing violence in the workplace.

Many publications are now available in Spanish as well as English to ensure that Spanish-speaking workers also have access to important workplace safety and health information.

OSHA cannot succeed in its mission without fully informed employers and employees. OSHA has a variety of products, programs, and services to help employers comply with its regulations and improve workplace safety and health.

All OSHA publications can be downloaded at no cost from the agency website at www.osha.gov. In addition, most are available in hard-copy form, some at no cost from OSHA and others as sale items from the U.S. Government Printing Office. For a list of available publications, visit www.osha.gov, call (800) 321-OSHA (6742), or fax to (202) 693-2498.

You can obtain publications for sale by writing: U.S. Government Printing Office, 710 N. Capitol St. NW, Washington, DC 20401; or calling (202) 512-0132 (phone); or (202) 512-1355 (fax). Or visit GPO's online bookstore, www.access.gpo.gov/su_docs/sale/abkst024.html.

OSHA also has several videos available for loan through the OSHA Publications Office. Call (800) 321-OSHA (6742) or visit the agency website at www.osha.gov for more information.

Education and Training

OSHA Training Institute

The OSHA Training Institute in Arlington Heights, Ill., a suburb of Chicago, provides basic and advanced training and education in safety and health for federal and state compliance officers, state consultants, other federal agency personnel, and private sector employers, employees, and their representatives.

Institute courses cover areas such as electrical hazards, machine guarding, ventilation, and ergonomics. Nearly 60 courses are available for private sector workers dealing with subjects such as

safety and health in the construction industry and methods of voluntary compliance with OSHA standards.

The Training Institute facility includes classrooms, laboratories, a library, and an audiovisual unit. The laboratories contain various demonstrations and equipment, such as power presses, woodworking and welding shops, a complete industrial ventilation unit, and a sound demonstration laboratory.

OSHA Training Institute Education Centers

OSHA's Office of Training and Education also administers the OSHA Training Institute Education Centers program. Under this program, certain nonprofit organizations offer the most frequently requested OSHA Training Institute courses for the private sector and other federal agency personnel at locations throughout the United States.

The education centers complement the training provided at the OSHA Training Institute. They are selected through a national competition based on occupational safety and health experience, non-academic training background, classroom and laboratory availability, and the ability to provide training throughout the region. OSHA provides no funding to the education centers. They support their OSHA training through their normal tuition and fees.

The education centers also help OSHA administer the OSHA Outreach Training Program—the agency's primary way to train workers in the basics of occupational safety and health. Through the program, individuals who complete a one-week OSHA training course are authorized to teach 10-hour or 30-hour courses in

construction or general industry safety and health standards. These individuals go on to train thousands more students each year.

Other Sources

In addition, OSHA's 73 area offices offer a variety of informational services such as personnel for speaking engagements, publications, audiovisual aids on workplace hazards, and technical advice.

OSHA training grant program

OSHA awards grants to nonprofit organizations to provide safety and health training and education to employers and workers in the workplace in subjects where OSHA believes there is a current lack of workplace training. Grants often focus on high-risk activities or hazards or may help nonprofit organizations establish ongoing training, education, and outreach efforts.

Organizations awarded grants use funds to develop training and educational programs, reach out to workers and employers for whom their program is appropriate, and provide these programs to workers and employers. Grantees follow up with students to find out how they applied the training in their workplace.

For more information contact OSHA Office of Training and Education, 2020 Arlington Heights Rd., Arlington Heights, IL 60005; or call (847) 297-4810.

For more information on grants, training, and education, visit OSHA's website at www.osha.gov.

Compliance Assistance

OSHA help for employers and employees

OSHA works closely with the states to help employers and employees comply with OSHA standards and regulations through an active compliance assistance program.

Compliance assistance specialists in each OSHA area office respond to requests for help from a variety of groups, including small businesses, trade associations, union locals, and community and faith-based groups. Compliance assistance specialists also are available for seminars, workshops, and speaking events. They can help employers establish safety and health management systems for their workplaces or refer them to the OSHA Consultation Service for assistance.

Safety and health management systems

A comprehensive safety and health management system is the key to a safe and healthful work environment. A workplace that is safe and healthful benefits both employers and employees. In addition to protecting workers from injuries and illnesses, it can stimulate innovation and creativity and result in increased performance and higher productivity.

OSHA Consultation Service

The OSHA Consultation Service is a free service that enables employers to identify potential hazards at their work-sites and ways to correct them, improve their occupational safety and health management systems, and even qualify for a one-year exemption from routine

Elements of a successful safety and health management system:

- Management leadership and employee involvement,
- Worksite analysis,
- Hazard prevention and control, and
- Safety and health training.

OSHA inspection. The service is delivered by state governments using well-trained professional staff. Most consultations take place on-site, though limited services away from the worksite are available.

Employer benefits

Besides helping employers identify and correct specific hazards, OSHA's consultation service provides free, on-site assistance in developing and implementing effective workplace safety and health programs that emphasize preventing worker injuries and illnesses. In addition, OSHA's regional offices can help with compliance, ergonomics, bloodborne pathogens, and small business concerns.

OSHA's comprehensive consultation assistance includes an appraisal of:

- Mechanical systems, physical work practices, and environmental hazards of the workplace; and
- Aspects of the employer's present job safety and health program.

Employers also may receive training and education services, as well as limited assistance away from the worksite.

Who qualifies for consultation assistance

Consultation assistance is available to smaller employers (with fewer than 250 employees at a fixed site and no more than 500 nationwide) who want help in establishing and maintaining a safe and healthful workplace.

Cost of consultation assistance

Consultation programs are funded largely by OSHA and run by state agencies at no cost to the employer who requests help. OSHA does not propose penalties or issue citations for hazards identified by the consultant. The employer's only obligation is to correct all serious hazards and potential safety and health violations the consultant identifies.

Employer privacy protections

State authorities provide consultation assistance to the employer with the assurance that his or her name and firm and any information about the workplace will not be routinely reported to OSHA enforcement staff.

Enforcement action

No citations are issued or penalties proposed for hazards identified by the consultant. The purpose of the program is to help smaller employers identify and fix hazards in their workplaces. However, if an employer does not correct violations identified through consultation assistance, the consultant may refer the employer for a possible inspection.

SHARP

Certain exemplary employers may request participation in OSHA's Safety and Health Achievement Recognition Program (SHARP). Eligibility for participation in SHARP includes receiving a comprehensive consultation

visit, demonstrating exemplary achievements in workplace safety and health by abating all identified hazards, and developing and implementing an excellent safety and health program.

Employers accepted into SHARP may receive an exemption from programmed inspections—not complaint or accident investigation inspections—for one year.

For more information about consultation assistance in your state, visit www.osha.gov.

Partnerships and Other Cooperative Programs

OSHA's cooperative programs

Voluntary, cooperative relationships among employers, employees, unions, and OSHA can be a useful alternative to traditional OSHA enforcement and an effective way to reduce worker deaths, injuries, and illnesses. OSHA has several types of cooperative programs:

- Alliances
- OSHA Strategic Partnerships,
- Voluntary Protection Programs, and the
- Safety and Health Recognition Program (SHARP).

Alliances

Alliances, OSHA's newest type of cooperative program, enable organizations committed to workplace safety and health to collaborate with OSHA to prevent injuries and illnesses in the workplace. OSHA and its allies work together to reach out to, educate, and lead the nation's employers and their employees in improving and advancing workplace safety and health.

Why participate

There are many benefits to participating in an Alliance with OSHA. Through this program, organizations will:

- Build trusting, cooperative relationships with the agency;
- Network with others committed to workplace safety and health;
- Leverage resources to maximize worker safety and health protection; and
- Gain recognition as a proactive leader in safety and health.

Who can participate

Alliances are open to all groups, including:

- Trade or professional organizations,
- Businesses,
- Labor organizations,
- Educational institutions, and
- Government agencies.

In some cases, organizations may be cooperating with OSHA for the first time. In others, they may be building on existing relationships with the agency that were developed through other cooperative programs such as strategic partnerships, the Voluntary Protection Programs, and consultation.

How Alliances work

There are few formal program requirements for Alliances, which are less structured than other cooperative agreements, and the agreements do not include an enforcement component. However, OSHA and the participating organizations must define, implement, and meet a set of short- and long-term

goals that fall into one or more of three categories:

- Training and education,
- Outreach and communication, and
- Promoting the national dialogue on workplace safety and health.

After an Alliance is signed

OSHA and its allies will form an implementation team. The team, consisting of OSHA and the organization's representatives, will develop strategies and begin implementing programs or processes for meeting the defined goals.

For more information about national Alliances, contact OSHA's Office of Outreach Services and Alliances at (202) 693-2340 or visit www.osha.gov. For information about regional or local alliances, contact the appropriate regional office listed on page 37 or call (800) 321-OSHA (6742).

OSHA Strategic Partnership Programs (OSPP)

OSHA Strategic Partnerships are voluntary, written, long-term agreements to form cooperative relationships between OSHA and groups of employers, employees, employees' union representatives, and sometimes other stakeholders (for example, trade and professional associations, universities, and other government agencies.) OSPs aim to have a measurable, positive impact on the American workplace by encouraging, assisting, and recognizing partners' efforts to eliminate serious hazards and to achieve a high level of worker safety and health.

What OSHA Strategic Partnerships do

These partnerships help participants:

- Establish effective safety and health management systems;
- Train managers and employees to recognize, and then eliminate or control, hazards common to their industry and their particular worksite;
- Give employees the opportunity to become involved meaningfully in their own protection; and
- Create ways for partners to share expertise and other resources.

How partnerships improve worker safety and health

Many OSHA Strategic Partnerships are designed to lead to the development and implementation of comprehensive workplace safety and health management systems. OSHA has found that a systems approach is the best strategy for reducing deaths, injuries, and illnesses on the job. Other partnerships focus on the elimination or control of a specific industry hazard.

Benefits of participating

Participating in an OSHA Strategic Partnership offers such benefits as:

- Declines in workplace injuries and illnesses, and consequent reductions in workers' compensation and other injury- and illness-related costs;
- Improved employee motivation to work safely, leading to better quality and productivity;

- Development or improvement of safety and health management systems;
- Positive community recognition and interaction; and
- Partnership with OSHA.

Voluntary Protection Programs

Voluntary Protection Programs (VPP) represent one part of OSHA's effort to extend worker protection beyond the minimum required by OSHA standards. There are three VPP programs: Star, Merit, and Demonstration. OSHA designed them to:

- Recognize outstanding achievement of employers and employees who are working together to provide high-quality worker protection by implementing effective safety and health management systems;
- Motivate other employers to achieve excellent safety and health results in the same outstanding way; and
- Establish a cooperative relationship between employers, employees, and OSHA.

How VPP can help employers and employees

VPP participation can mean:

- Improved employee motivation to work safely, leading to better quality and productivity;
- Lost workday case rates generally 50 percent below industry averages;
- Reduced workers' compensation and other injury- and illness-related costs;

- Positive community recognition and interaction;
- Further improvement and revitalization of already good safety and health management systems; and
- Partnership with OSHA.

How OSHA monitors VPP sites

OSHA reviews an employer's VPP application and conducts an on-site review to verify that the safety and health systems described are operating effectively at the site. OSHA continues to conduct regular evaluations of approved sites.

All participants must submit to their OSHA regional office in February of each year a copy of the most recent annual evaluation conducted at the site. This evaluation must include the injury and illness numbers and rates for the past year.

OSHA inspections at VPP sites

Sites participating in a VPP are not scheduled for regular, programmed inspections. OSHA, however, handles any employee complaints, serious accidents, or significant chemical releases that may occur according to routine enforcement procedures.

OSHA Quotes

What employers and employees are saying about the value of working with OSHA to promote workplace safety and health

Employers and employees are recognizing that OSHA has changed and that the agency wants to work cooperatively with them to help improve their workplaces. More and more, employers are coming to seek out OSHA's assistance and support as they introduce new ways of doing things that protect their workers and strength their businesses.

Here's just a sampling of what people are saying...

About the business sense behind workplace safety and health:

"We can't make a quality product with an unsafe process." – [Ken Lindgren, DACO, Inc.](#)

"It makes sense to run an effective safety and health program because your people deserve it, your customers demand it, and your business practices and future will not be there without it." – [Dan Fergus, Genesee Stampings](#)

"Safety is a pass/fail item, in that if you fail at safety, the other stuff doesn't matter." – [Mac Armstrong, Air Transport Association](#)

"If you want to be the best company out there, then it's not enough to have good wages, benefits, and profitability. You have to have a good safety program in place and make sure you have a safe company." – [Gordon Hannaford, Point-Five Windows](#)

About the quality-of-life benefits of safety and health:

"I want to see and hear my grandchildren, and because of the safety program at Curtis Lumber, I'm going to be able to." – [John Meier, Curtis Lumber](#)

"We feel that it is our duty to have every employee return home to his or her family sound and healthy every day." – [John Obel, NexTech](#)

About working with OSHA through its programs and services:

"The health and safety of our people has always been of paramount importance to us. Our goal of zero incidents required teamwork like OSHA's Strategic Partnership Program, combined with relentlessly pursuing the elimination of unsafe actions and conditions." – [Walter Berry, Bollinger Shipyards, Inc.](#)

"It's funny how so many people are afraid of OSHA and afraid of the big fines. But in the Consultation Program, they're not there to issue fines. They're there to help you. It's a wonderful, wonderful program that has a lot to offer." – [Keri Alwin, Laser Technologies, Inc.](#)

"I must admit, when the company first proposed a partnership with OSHA, I was apprehensive. Now I'm convinced that this was the right thing to do." – [Nathan Bailey, Ford-Visteon](#)

About sharing what they've learned about workplace safety and health:

"We're big on sharing what we know about safety and health. We know that our program is making a difference and we want to give other facilities an opportunity to learn how to protect their workers, too." – [Sherry Welch, Citizens Memorial Healthcare Foundation](#)

Regional Offices

Region I

(Connecticut,* Massachusetts, Maine, New Hampshire, Rhode Island, Vermont*)

JFK Federal Building, Room E340
Boston, MA 02203
(617) 565-9860

Region II

(New Jersey,* New York,* Puerto Rico,* U.S. Virgin Islands*) 201 Varick

Street, Room 670
New York, NY 10014
(212) 337-2357

Region III

(Delaware, District of Columbia, Maryland,* Pennsylvania,* Virginia,* West Virginia)

The Curtis Center
170 S. Independence Mall West
Suite 740 West
Philadelphia, PA 19106-3309
(215) 861-4900

Region IV

(Alabama, Florida, Georgia, Kentucky,* Mississippi, North Carolina,* South Carolina,* Tennessee*)

Atlanta Federal Center
61 Forsyth Street SW, Room 6T50
Atlanta, GA 30303
(404) 562-2300

Region V

(Illinois, Indiana,* Michigan,* Minnesota,* Ohio, Wisconsin)

230 South Dearborn Street,
Room 3244
Chicago, IL 60604
(312) 353-2220

Region VI

(Arkansas, Louisiana, New Mexico,* Oklahoma, Texas)

525 Griffin Street, Room 602
Dallas, TX 75202
(214) 767-4731 or 4736 x224

Region VII

(Iowa,* Kansas, Missouri, Nebraska)

City Center Square
1100 Main Street, Suite 800
Kansas City, MO 64105
(816) 426-5861

Region VIII

(Colorado, Montana, North Dakota, South Dakota, Utah,* Wyoming*)

1999 Broadway - Suite 1690
Denver, CO 80202-5716
(303) 844-1600

Region IX

(American Samoa, Arizona,* California,* Hawaii, Nevada,* Northern Mariana Islands)

71 Stevenson Street, Room 420
San Francisco, CA 94105
(415) 975-4310

Region X

(Alaska,* Idaho, Oregon,* Washington*)

1111 Third Avenue, Suite 715
Seattle, WA 98101-3212
(206) 553-5930

*These states and territories operate their own OSHA-approved job safety and health programs (Connecticut, New Jersey, and New York plans cover public employees only). States with approved programs must have a standard that is identical to, or at least as effective as, the federal standard.

Note: To get contact information for OSHA area offices, OSHA-approved state plans, and OSHA consultation projects, please visit us online at www.osha.gov or call us at **(800) 321-OSHA (6742)**.

Regional Offices

- A**
- Advisory Committees, 10
- Alliances, 3, 33-34
- Atomic energy workers, 4
- B**
- Brown lung disease, 2
- Bureau of Labor Statistics, 17
- C**
- Citations, see Enforcement
- Compliance assistance, 3, 21, 29-31
- Complaint, how to file, 6, 7, 12, 23
- Consultation, 3, 31-33
- Costs of workplace illness and injuries, 1, 2, 3
- Criminal actions, against employers, 26, 27
- E**
- Electronic information, see Website (OSHA)
- Enforcement, 3, 6, 11, 20, 21-28
- Ergonomics, 10, 29
- F**
- Farms and farmers, 4
- Fatalities (workplace), 1, 2, 3, 16, 22
- Federal Register, 13, 14
- Fines, see Penalties
- Forms (OSHA Forms 300, 300A, 301), 20, 24
- G**
- General Accounting Office, 14
- Grants, 31
- Guidelines, 15, 29
- H**
- Health and Human Services (HHS),
Department of, 13, 14
- I**
- Injury and Illness Rates and Records, 1, 2,
16-20, 24
- Inspections, 5, 11, 21-28, 32, 35
- Investigations, 6, 21
- J**
- Judicial review (of standards), 15
- K**
- Low-hazard industries, 17
- M**
- Medical exams, 5
- Medical records, 5, 6
- Mine workers, 4
- Multiple worksites, 18
- N**
- National Institute for Occupational Safety
and Health (NIOSH), 5, 13, 14
- Nixon, President Richard M., 2
- O**
- Occupational disease, 2
- Occupational Safety and Health Act (Public
Law 91-596), 1, 2, 3, 4, 7, 8, 10, 11, 13,
14, 15, 21, 22, 25, 28
- Occupational Safety and Health
Administration, creation of, 1, 2
- Occupational Safety and Health Review
Commission, 28-29
- Outreach, 3, 29-30
- P**
- Partnerships, 3, 21, 33, 34-35
- Penalties, 3, 25-27, 28, 32
- Poster, OSHA, 5, 6, 17, 20, 24
- Privacy, right to, 20, 32
- Protective equipment, 6, 13
- Public sector employees, 9-10
- Q**
- QuickTakes, 29
- R**
- Recordkeeping, 3, 5, 16-20
- Regulatory Agenda, 13
- Reporting accidents, injuries, illnesses, 5, 6,
16, 17, 18, 20
- Reporting hazardous conditions, 6, 7, 8, 16,
17, 18, 20
- Retaliation (against workers), 8
- S**
- Safety and Health Programs, 5, 6, 12, 31-33
- Safety and Health Achievement Recognition
Program (SHARP), 32-33
- Search warrants, 22
- Self-employed, 4
- Small business, 14, 25, 29
- Spanish language publications, 29
- Standards, Safety and Health, 3, 5, 6, 12, 13,
14, 15
- State employees, 4
- State programs ("state plan states"), 3, 4, 7,
10, 11-12
- Steiger, Representative William A., 2
- Strategic Partnership Programs, 34-35
- T**
- Teen workers, 29
- Training (OSHA), 30-31
- Trenching and excavation, 2
- U**
- Unsafe conditions, 7, 8
- V**
- Variations, 14, 15-16
- Violations, 26-27, 28
- Voluntary Protection Programs, 33, 35
- W**
- Website (OSHA), 29, 30
- Whistleblower protections, 8-9
- Williams, Senator Harrison A., 2
- Workplace Fatalities (see Fatalities)





**Occupational Safety
and Health Administration**

www.osha.gov

Tab 6

More Safety and Health Resources - USPS & The Web



NALC Guide to Safety and Health

***USPS Handbooks & Publications, etc.
related to
Safety & Health Issues***

Handbooks

HBK AS-303	National Security Information
HBK AS-504	Space Requirements
HBK AS-550-A&B	Paper and Paperboard Recycling Guide and Plan
HBK AS-551	Clean Air Act Compliance Handbook
HBK AS-552	Pollution Prevention Guide
HBK AS-553	Hazardous Waste Management
HBK AS-554	Water Reference Guide
HBK AS-554-A	Water Management Guide for Facility Managers
HBK AS-554-B	Water Conservation Guide
HBK AS-554-C	Vehicle Washing Technologies
HBK AS-554-D	Water Permitting Guide
HBK AS-555	Environmental Compliance Quality Assurance; Review Guide
HBK AS-556	Asbestos Management Guidelines
HBK AS-558	Facility Energy Management Guide
HBK AS-707-H	Contracting for Food Services
HBK AS-816	Open VMS Security
HBK EL-307	Reasonable Accommodation: An Interactive Process
HBK EL-505	Injury Compensation
HBK EL-602	Food Services Operations
HBK EL-602A	Food Services Operations (Large Print)
HBK EL-602B	Food Services Operations (Braille)
HBK EL-800	Managing Contract Health & Safety Compliance
HBK EL-801	Supervisor's Safety Handbook
HBK EL-802	Executive's and Manager's Safety Compliance Guide
HBK EL-803	Maintenance Employee's Guide to Safety
HBK EL-806	Health and Medical Service (plus supplement: CPR Booklet)
HBK EL-809	Guidelines for Local Joint Labor-Management
HBK EL-809T	Instructor's Guide Labor-Management Safety and Health Ctte Training Program
HBK EL-812	Hazardous Materials and Spill Response
HBK EL-814	Employee Guide to Safety
HBK MS-1	Operation and Maintenance of Real Property
HBK MS-10	Floors, Care and Maintenance
HBK MS-11	Industrial Storage Batteries
HBK MS-21	Elevator Maintenance
HBK MS-22	Street Letter Box Maintenance
HBK MS-24	Heating, Cooling and Ventilating
HBK MS-28	Maintenance of Electrical Switchgear

HBK MS-43	General Maintenance for Mail Handling Equipment
HBK MS-47	Housekeeping - Postal Facilities
HBK MS-49	Energy Conservation and Maintenance Contingency Planning
HBK MS-56	Fire Prevention and Control
HBK MS-77	Overhaul and Upgrade Mechanized Mail Processing Equipment
HBK MS-110	Associate Office Postmaster's Facilities Maintenance Guidelines
HBK PO-515	Highway Contractor Safety
HBK PO-516	Highway Contractor Safety (Pocket edition)
HBK PO-517	Guide for Safe Use of the Eastern Region Mail Container
HBK PO-701	Fleet Management
HBK PO-702	Accident Investigation - Tort Claims
HBK RE-4	Standards for Facility Accessibility by the Physically Handicapped
HBK RE-5	Building and Site Security Requirements
HBK RE-6	Facilities Environmental Guide
HBK RE-12	Repair and Alteration Surveys
HBK RE-13	Repair and Alteration of Real Property Facilities

NB: For those who are interested, there are numerous additional handbooks in the MS series that deal with the maintenance of particular postal machinery.

Labels

LAB 1	Do Not Block Door
LAB 27	Bee Ware
LAB 28	Live Animals
LAB 47	Evacuation Forms 809 & 810
LAB 61-O	Emergency Supplies
LAB 62	Positioning Restraining Straps
LAB 70	Safety Check and Vehicle Dimensions
LAB 112	Alarms Protect Postal Property (4 x 4)
LAB 112-A	Alarms Protect Postal Property (6.5 x 6.5)
LAB 117-A	Warning: Armed Robbery
LAB 117-B	Warning: Armed Robbery (Spanish) (For post office walls)
LAB 117-C	Warning: Armed Robbery (Spanish) (For post office windows)
LAB 118	Caution: Scissors Lift
LAB 209	Security Container Label
LAB 215	Caution: Ultra Violet Radiation Within
LAB 216	Warning: Rotating Parts

LAB 217	Do Not Wear
LAB 218	When Clearing Stacker
LAB 219	Caution: Do Not Clear
LAB 220	Caution: Keep Hands Off Belt
LAB 221	To Remove Full Trays
LAB 222	Emergency Stop
LAB 224	Caution: Keep Closed -Turn Power Off Before Opening
LAB 225	Prevent Theft
LAB 229	Skylight Warning
LAB 232	Anchor Fixture Warning

Management Instructions

MI AS-510-87-3	Compliance with OSHA Standards - Facility Construction Program
MI AS-510-87-14	Policy and Guidelines for preventive Maintenance on Building Systems Equipment
MI AS-510-94-4	Security Counterlines
MI AS-510-97-6	Environmental Integration in the New construction process
MI AS-530-90-5	Preventive Maintenance For Mail Processing Equipment
MI AS-550-91-10	Pollution Prevention Program
MI AS-550-92-2	Waste Reduction
MI AS-550-92-8	Hazardous Waste Management
MI AS-550-95-9	Underground Storage Tank Management
MI AS-550-95-10	Integrated Pest Management
MI AS-550-95-14	Recycling of Discarded Mail and UBBM
MI AS-550-95-18	Clean Air Act Compliance
MI AS-550-96-4	National Environmental Policy Act Operational Guidance
MI AS-550-96-8	Procedures for Reporting Releases of Hazardous and Regulated Substances to the Environment
MI AS-550-97-4	Facility Energy Management Program
MI AS-550-1999-3	Environmental Compliance Review Program
MI AS-550-2002-7	Stormwater / Wastewater Management
MI AS-620-94-1	Safety Inspection of Heating Boilers, Unfired Pressure Vessels, Elevators, Escalators, and Dumbwaiters
MI EL-520-91-2	FEHB: Temporary Continuation of Coverage
MI EL-540-91-1	Job-related First Aid Injuries
MI EL-810-93-1	Confined Space Safety
MI EL-810-96-1	Response to Hazardous Materials Release
MI EL-810-96-2	Hazard Communication Programs
MI EL-810-98-1	Asbestos-Containing Building Materials Control Program
MI EL-810-1999-1	Lead Hazard Management

MI EL-810-2000-1	Hearing Conservation Program
MI EL-810-2000-2	Bloodborne Disease Exposure Control Plans
MI EL-820-1998-3	Procurement of Prescription Safety Glasses
MI EL-830-1999-5	Control of Asbestos Exposure from Brake and clutch Repair and Service
MI EL-860-98-2	Medical Records
MI EL-860-1993-3	Emergency Response to Mail Allegedly Containing Anthrax
MI EL-860-2000-7	Fitness for Duty Examinations
MI PO-530-91-B	Screening Mailhandling Contract Employees
MI PO-720-95-2	Alcohol and Drug Testing of Employees With a Commercial Driver's License
MI PO-730-90-1	Accident Investigation Tort Claim Activities

Memorandums of Policy (only available on USPS Intranet – “blue”)

MOP COO-10-16-2001	Cleaning Policy Clarification Due to Anthrax Incidents
MOP COO-10-24-2001	Possibility of Harmful Biological Agents at Collection and Retail Acceptance Points
MOP COO-10-24-2001-2	Personal Protection Equipment Purchases
MOP COO-10-24-2001-3	Anthrax Awareness, Protection and Reporting
MOP COO-11-16-2001	Policy on Hoaxes and False Reports
MOP COO-02-28-2002	Personnel Cooling Fans
MOP DD-08-13-1998	Postal Service Policy on Sexual Harassment
MOP DD-08-27-1998	U. S. Postal Service Policy on Diversity
MOP EN-06-10-1993	Policy for Environmental Protection
MOP EN-12-16-1994	Mercury-Containing Lamps Disposal
MOP EN-03-22-1996	Energy Conservation Program Strategy
MOP EN-06-25-1996	Alternative Fuel Utilization for Postal Vehicles
MOP EN-07-12-1996	Environmental Roles and Responsibilities for Managers
MOP EN-11-14-1996	AOI Project Support – Asbestos Surveys
MOP EN-05-18-1998	Asbestos Control Programs
MOP ERM-03-26-2001	OSHA Recording Keeping Reviews
MOP ERM-03-29-01-1	Accident Reduction Plans
MOP FA-05-31-1996	Purchase and Lease of Contaminated Properties
MOP HR-02-02-1998	OSHA Respiratory Protection Final Rule – Interim Guidance
MOP HR-07-14-1999	The Safety Toolkit
MOP OS-04-21-1998	Hazardous Materials and Dangerous Goods in the Mail
MOP OS-10-01-2001	Vehicle Security
MOP OS-10-23-2001	Vehicle Security
MOP RE-06-16-1998	Hazardous Materials – Prominent DiStatistical Programs Letteray of Poster 76 and Notice 107

Notices

NOT 9	No Smoking — Open Flame
NOT 38	Approaches to Curbside Mailboxes
NOT 50	Theft? Protect Your Mail
NOT 71	Bombs by Mail
NOT 76	Expanded Vehicle Safety Check
NOT 80	Mail Chute Obstructions
NOT 93	Alternative Mail Security Installations
NOT 107	Some Things Were Never Meant to be Mailed
NOT 107-S	Hazardous Materials! (Spanish)
NOT 130	Warning of Illegal Drugs
NOT 204	Dog Days
NOT 279	Heating Ventilating Air conditioning Controls, Maintenance, and Calibration
NOT 423	FEHB Temporary Continuation of Coverage
NOT 426	Health Benefits Coverage for Noncareer employees
NOT 427	Health Benefits/Selecting Health Insurance Plan

Posters

POS 21	Sexual Harassment (10 x 10)
POS 21-A	Sexual Harrassment (18 x 24)
POS 21-B	Varieties of Sexual Harassment
POS 21-C	Sexual Harassment — It's Illegal
POS 26	Letter and Package Bomb Indicators
POS 37	Keep the Mail Safe
POS 49	Tire Pressure Chart
POS 50-A	Breast Cancer Stamp
POS 50-B	Breast Cancer Stamp
POS 61	Policy Statement on Drug Abuse
POS 62	Violence-Free Workplace
POS 66	Workplace Security
POS 76	Some things Were Never Meant to Be Mailed
POS 76-S	Hazardous Materials (Spanish)
POS 84	Suspicious Mail
POS 113-A	Examine Empty Sacks & Pouches (11 x 14)
POS 113-B	Examine Empty Sacks & Pouches (21 x 28)
POS 118	Say "Nope" to Dope
POS 128	To Them Their Comments are Harmless. To Her They are Offensive
POS 130	Occupational Safety and Health Protection for Postal Employees
POS 158	Possession of Firearms & Other Dangerous Weapons on Postal Property is Prohibited by Law

POS 163	Managing Hazardous Waste Documentation
POS 165	Hazardous Waste Container Labeling
POS 166	Hazardous Material Storage Spill Containment
POS 167	Disposing of your Hazardous Waste
POS 168	Maintaining Refrigerant Management Records
POS 169	Fluorescent Lamps and Ballast Disposal
POS 264-C	Injury Compensation Abuse Poster (Letter Carrier)
POS 265	Drugs by Mail
POS 298	Hazardous Materials Warning Labels
POS 310	Mail Theft Is a Crime
POS 311	Tampering With Mail
POS OSHA 3165	Job Safety & Health Protection — English Language
POS OSHA 3167	Job Safety & Health Protection — Spanish Language

Publications

PUB 12	Health Benefits Open Season Administrative and Processing Information
PUB 14	Prohibitions and Restrictions on Mailing Animals, Plants and Related Products
PUB 30	Breast Cancer
PUB 45	A Violence-free Workplace
PUB 52	Hazardous, Restricted & Perishable Mail
PUB 54	Notice of Bomb threat
PUB 71	Notice for Employees Requesting Leave for Conditions Covered by the FMLA
PUB 107	Crisis Management Plan for Incidents of Violence in the Workplace
PUB 108	Threat Assessment Team Guide
PUB 129	Safety Talks
PUB 152	EAP counselor's Resource Guide
PUB 155	Rural Letter Carrier Safety Orientation
PUB 159-A	Contingency Planning - Work Stoppages
PUB 159-B	Contingency Planning - Civil Disorders and Natural Disasters
PUB 159-C	Contingency Planning -For Bombs and Bomb Threats
PUB 159-D	Wartime Contingency Planning
PUB 166	Mail Center Security Guide
PUB 170	Security Control Officer Program (folder)
PUB 174	How to Avoid Dog Bites: Dogs and Dog Repellent
PUB 176	Carrier Robbery/Assault
PUB 188	Child Safety Letter
PUB 188-SP	Child Safety Letter (Spanish)

PUB 266	Blueprint for Plant Security
PUB 275	Post Office Robbery
PUB 302	Postal Employees Crime Prevention
PUB 308	Know Your Rights; A Guide for Victims & Witnesses
PUB 317	Manager's Guide to Reasonable Accommodation
PUB 318	Reasonable Accommodation Interactive Process
PUB 518	Employee Assistance Program/Supervisor's Guide
PUB 519	Employee Assistance Program
PUB 519--S	Programa de Asistencia Para Empleados (EAP Hotline Guide) (Spanish)
PUB 521	EAP Wallet Card
PUB 540	A Guide for Managing Injuries
PUB 552	Manager's Guide to Understanding Sexual Harassment
PUB 553	Employee's Guide to Understanding Sexual Harassment
TDs	Driver Training Series
087	Instructor's Guide Driver Selection, Orientation, Familiarization & Certification- Driver Training Program
087a	Driver training Program - Administrator's Guide - Development series
087-1A	Driver Training Program - Orientation for Drivers - Instructor's Guide
087-1B	Driver Training Program - Learner's Workbook The Long Life Vehicle - Driver Training Program

Forms

PS 202	Health Benefits Refund Payment Authorization
PS 279	Certification of Elevator Inspection
PS 279-A	Certification of Pressure Vessel Inspection
PS 810	Safety Notification Card (postcard)
PS 1366	Contingency Planning Data Collection
PS 1506	Mail Chute Inspection
PS 1508	Statement by Shipper of Firearms
PS 1534	Vehicle Data Questionnaire
PS 1700	Accident Investigation Worksheet
PS 1752	Health Unit Daily Record
PS 1760	Safety & Health Change Request
PS 1766	Hazard Warning Card
PS 1767	Report of Hazard, Unsafe Condition or Practice (4-part set)
PS 1768	Safe Driver Award Committee Decision (3-part set)
PS 1769	Accident Report (16-page, 3-part set)
PS 1770	Hazardous Materials Incident Report (3-part set)
PS 1772	Accident Log

PS 1773	Report of Hazard Log
PS 1778	Dog Warning Card
PS 1783	On-the-Job Safety Review/Analysis
PS 1997	Health Unit Case Record (card)
PS 2013	Sensitive Security Clearance Processing Request
PS 2016	Mail Theft & Vandalism Complaint
PS 2027	Burglary Report
PS 2162	Burglary & Robbery Countermeasures Program
PS 2181-A	Pre-Employment Screening -Authorization and Release
PS 2181-B	Applicant Drug Testing - Consent and release
PS 2181-C	Authorization and Release-Background Investigation (USPS Contractors and Employees of Contractors)
PS 2198	Accident Report - Tort Claims
PS 2480	Driving Record - For Positions That Require Driving
PS 2481	Applicant Notice - Strength and Stamina Test
PS 2485	Medical Examination & Assessment (8-Page set)
PS 2486	Report of Specific Medical Condition
PS 2488	Authorization for Medical Report
PS 2489	Identification of Physical/Mental Disability
PS 2491	Medical Report - First Aid Injuries (3-part set)
PS 2492	Request for Fitness-for-Duty Examination
PS 2548-03	Individual Training Record - City Letter Carrier
PS 2573	Request - OWCP Claim Status
PS 3111	Federal Employee Health Benefits (FEHB) Coverage or Termination While in Leave Without Pay (LWOP) Status
PS 4583	Vehicle Maintenance Work Order (card)
PS 4564	Postal Vehicle Accident Register
PS 4565	Vehicle Repair Tag (3 part set)
PS 4568	Postal Equipment Problem Feedback
PS 4585	Postal Driver Accident Information (card)
PS 4586	Accident Information (postal card)
PS 4774	Equipment Breakdown Investigation Report
PS 4777	Maintenance Checklist
PS 4805	Maintenance Work Order Request (4-part)
PS 4812	High Voltage Equipment Lockout Tag
PS 4813	Elevator Data Card
PS 4838	Repair and Alteration History
PS 4841	Fuel and Utilities Record
PS 4846	Low Pressure Heating Boiler Operating Log (Steam)
PS 4846-A	Low Pressure Heating Boiler Operating Log (Hot Water)
PS 4853	Heating and Cooling Chart
PS 4984	Repair Parts Requisition

National Association of Letter Carriers, AFL-CIO
Safety Resources ~ July 1, 2003

PS 5035	Overweight Sack
PS 5309	Incident Report
PS 5314	Radio Equipment Maintenance and History Record (card)
PS 7314	Medical Agreement (4 pages)
PS 7366	FPR Safety Certification
PS 7498-D	Facilities Environmental Checklist
PS 7526	Weapon Inspection Maintenance Record
PS 7530	Case Activity Report – Internal Crimes
PS 7531	Case Activity Report – External Crimes
PS 7533	Case Activity Report – Prevention / Security
PS 7532	Robbery Report
PS 7536	Bomb and Bomb Hoax Incident Report
PS 7537	Bomb Threat Report
PS 7540	Firearms Permit (card)
PS 8139	Your Role in Protecting the Security of the U.S. Mail
PS 8145	Contract Vehicle Inspection Report
PS 8174	Assault and Threat Specialty Report
PS 8187	Hazardous and Regulated Substance Release Notification
PS 8194	Record of Environmental consideration
PS 8195	Operational Environmental checklist
PS 8201	Pre-Tax Health Insurance Premium Waiver/Restoration Form for Career Employees
PS 8202	Pre-Tax Health Insurance Premium Election/Waiver Form for Noncareer Employees
PS 8210	Work Authorization - Asbestos

National Association of Letter Carriers

***INTERNET Resources
related to
Safety & Health Issues***

COSH GROUPS

New York Committee for Occupational Safety and Health:
<http://www.nycosh.org/index.html>

ENVIRONMENT

Environmental Protection Agency: <http://www.epa.gov>
Enviro Facts: http://www.epa.gov/enviro/html/ef_overview.html
RTK Net: <http://www.rtk.net>
Environmental Information Resources: <http://www.gwu.edu/~greenu/index2.html>
Pesticide Information Profile:
<http://ace.orst.edu/info/extoxnet/pips/searchindex.html>
Tox Net: <http://toxnet.nlm.nih.gov/>

ERGONOMICS

OSHA's Ergonomics Page: <http://www.osha-slc.gov/SLTC/ergonomics/index.html>
OSHA's Ergonomics Guidelines Page:
<http://www.osha-slc.gov/SLTC/ergonomics/guidelines.html>

GOVERNMENT

UNITED STATES

Occupational Safety and Health Administration Home Page:
<http://www.osha.gov>
OSHA Salt Lake Technical Center: <http://www.osha.gov/dts/sltc/index.html>
National Institute for Occupational Safety & Health Home Page:
<http://www.cdc.gov/niosh/homepage.html>
Center for Disease Control & Prevention: <http://www.cdc.gov>
Bureau of Labor Statistics, Safety & Health Statistics: <http://www.bls.gov/iif/>
Info Network for Public Health Officials: <http://www.phppo.cdc.gov/>
Agency for Toxic Substance & Disease Registry: <http://www.atsdr.cdc.gov/>
National Institute of Health: <http://www.nih.gov>
National Library of Medicine: <http://www.nlm.nih.gov/>
DOE Worker Health & Safety Site: <http://tis.eh.doe.gov/whs/>
Chemical Safety & Hazard Investigation Board: <http://www.csb.gov/>

INTERNATIONAL

Canadian Centre for Occupational Safety & Health: <http://www.ccohs.ca/>
European Agency for Safety & Health: <http://europe.osha.eu.int/>
World Health Organization: <http://www.who.org>

HEALTH ORGANIZATIONS

American Cancer Society: <http://www.cancer.org>
American Heart Association: <http://www.americanheart.org>
American Red Cross: <http://www.redcross.org>
American Lung Association: <http://www.lungusa.org>
Diabetes Foundation: <http://www.diabetes.org>
Muscular Dystrophy Association: <http://www.mdausa.org>

LABOR ORGANIZATIONS

AFL-CIO: <http://www.aflcio.org>
AFL-CIO Safety & Health Main Page: <http://www.aflcio.org/safety/>
Canadian Labor Congress: <http://www.clc-ctc.ca/>

MATERIAL SAFETY DATA SHEETS

NJ Haz Substance: <http://www.state.nj.us/health/eoh/rtkweb/rtkhsfs.htm>
Cornell University MSDS Archive: <http://msds.pdc.cornell.edu/msdssrch.asp>
Where to find MSDS on the Internet: <http://www.ilpi.com/msds/index.html>

MISCELLANEOUS

Internet Safety resources: <http://www.christie.ab.ca/safelist/>

TRADE ASSOCIATIONS

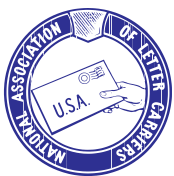
American National Standards Institute: <http://www.ansi.org>
American Society of Heating, Refrigerating & Air Conditioning Engineers:
<http://www.ashrae.org>
The National Fire Protection Association: <http://www.nfpa.org>
National Safety Council: <http://www.nsc.org/>
American Industrial Hygiene Association: <http://www.aiha.org/>
American Public Health Association: <http://www.apha.org/>

WOMEN'S HEALTH

Breast Cancer Resource Center: <http://www.healingwell.com/breastcancer/>
Boston Women's Health Collective: <http://www.ourbodiesourselves.org>
National Women's Health Information Center: <http://www.4woman.gov>
Society for Women's Health Research: <http://www.ncrw.org/digest/swhr.htm>
Women's Health Issues: <http://www.feminist.com/health.htm>

WORKERS' COMPENSATION

Office of Workers Compensation Program: http://www.dol.gov/esa/owcp_org.htm
U.S. Workers Compensation Law Cornell Law School:
http://www.law.cornell.edu/topics/workers_compensation.html



NALC Guide to Safety and Health

A Basic Reference for NALC
Local Safety and Health Activists

NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO

100 Indiana Avenue, NW - Washington, DC 20001-2144

OFFICERS

Jim Williams <i>Executive Vice President</i>	William H. Young <i>President</i>	Gary H. Mullins <i>Vice President</i>
Jane E. Broendel <i>Secretary-Treasurer</i>		Jim Korolowicz <i>Assistant Secretary-Treasurer</i>
Fredric V. Rolando <i>Director of City Delivery</i>		Brian E. Hellman <i>Director of Safety and Health</i>
Myra Warren <i>Director of Life Insurance</i>		Timothy C. O'Malley <i>Director, Health Benefit Plan</i>
	Donald T. Southern <i>Director of Retired Members</i>	

BOARD OF TRUSTEES—LAWS SECTION

	Lawrence D. Brown, Jr. <i>Chair</i>	
Daniel T. Rupp		Randall L. Keller

NATIONAL BUSINESS AGENTS

Dale P. Hart	Judy Willoughby
Paul Price	Gene Goodwin
Neal Tisdale	William J. Cooke
Wesley A. Davis	William J. Lucini
Arthur W. Buck	Timothy W. Dowdy
Patrick C. Carroll	John J. Casciano
Ned Furr	George C. Mignosi
Lew Drass	
