~~DOCUMENTATION CHECKLIST FOR EVALUATION TEAM

The following documents should be readily available for review upon the team's arrival. They should be organized and appropriately labeled. They should be located in the room set aside for the review team.

Copy of Department of Veterans Affairs Safety and Health Program
Medical Center policy, goal, and objective statements
Injury/Illness logs for the Medical Center (most recent three full years and year-to-date logs)
First reports of injury
First aid logs
Employee medical records
Reports identifying potential health hazards, IH sampling schedules and records, including medical surveillance records required by OSHA standards.
Self inspection and accident reports, including tracking
Training programs for safety and health (including committee training where applicable, and OSHA recordkeeping training), training schedules, records of training accomplished and attendance records.
Personal protective equipment programs: Respirator, Hearing Protection, Safety Shoes, Safety Glasses, Hard Hats, Other
Employee complaint program & tracking system. Forms for reports of safety or health problems, suggestions, and tracking systems.
Complete employee roster and organizational chart.
Safety and health committee member listing and minutes (where applicable).
Lockout/Tagout program.
Hospial safety and health rules, emergency procedures and drills.
Hazard Communication Program including a list of all hazardous chemicals onsite.
Self-inspection reports for safety and health including the tracking system.
Preventive maintenance programs and records:
fire protection (hoses, fire extinguishers, sprinklers, alarms, water pressure)
Hazard reviews and analysis documentation such as process safety reviews and job safety analyses.
Records of engineering controls.
Evidence of line accountability (documents communicating managers' responsibility, performance evaluations of different levels of management, reward and penalty systems, budget accountability, disciplinary system, etc.).
Contractor program, including onsite injury records.
Annual safety and health evaluation report and tracking system. Internal audits or evaluations of the entire safety and health program, including analysis of progress toward statistical and structural/programmatic goals.

FEB 12 1999

Mr. T.C. Doherty
Medical Center Director
Veterans Affairs Medical Center
1201 N.W. 16th Street
Miami, Florida 33125

Dear Mr. Doherty:

This is to confirm my telephone conversation with Mr. Jack Hetrick, Associate Director on February 9, 1999.

In accordance with the "Partnership Evaluation of the Department of Veterans Affairs Safety and Health Programs" (enclosed), this serves as notification that an onsite evaluation has been scheduled at your facility on March 8-12, 1999. The evaluation team will consist of Guadalupe A. (Tony) Reyes, team leader, David B. Kendall, OSHA Industrial Hygenist, Ed Shedlock, VA Safety and Fire Protection Engineer, Darcy White, VA Industrial Hygenist, Barry W. Jackson, VA Union Representative, Dr. Myrna Aavedal, Phd., VA National Office, Marilyn Waggoner, VHA Representative, Lewis Ligon, OSHA National Representative.

The evaluation will begin with an onsite opening conference. Management representatives and employees involved with the site's safety and health program and the evaluation should be available for the opening conference.

The agenda of activities for the week will include a document review of the safety and health program, injury/illness reports and safety and health activities, interviews with employees and managers and a tour of the worksite. A closing conference is tentatively scheduled for Friday morning. A copy of the proposed agenda is enclosed.

Enclosed also is a list of documents to have available for review by the evaluation team. Please have the documents available when the team arrives on site. In addition, the team will need a private room reserved to review documents and conduct formal interviews.

If there are any questions with the schedule of activities, please call me on (404) 562-2257.

We appreciate your participation in the partnership program between the Occupational Safety and Health Administration and the Department of Veterans Affairs.

Sincerely,

Guadalupe A. Reyes
Federal Agency Programs Officer

Enclosures

vhasiteg.wpd

VHA SITE FINDINGS

The onsite team will use the following as the basis for their work onsite.

1. Review of written documentation.
2. Interviews
3. Data

The following grid of 1960 will be used as a guideline to review the overall program as well as the specific areas of emphasis of this evaluation. These areas of emphasis are as follows:

1. Hazard communication and hazardous materials
2. Bloodborne pathogens
3. Tuberculosis
4. Formaldehyde
5. Ethelene Oxide
6. Confined Space
7. Fire Protection
8. Emergency response procedures
9. PPE
10. Annual inspection of facility by a qualified safety and health professional.
11. Complaint handling procedures
12. Safety and health committees
13. Top management support
14. Accountability for safety and health at the facility
15. Sufficient starff to perform oversight of the program
16. VA's procedures to assure accountability for OSH issues
17. Effectiveness of the DASHO within the VA
18. Timeliness of abatement actions implemented th the VA
19. Effectiveness of the VA labor/management partnership as it applies to OSH
20. Compliance with training requirements
21. Effectiveness of the VA's violent behavior prevention activities.]
22. Headquarters safety and health program oversight
23. Compliance with OSH Training requirements

VHA SITE FINDINGS

Requirement.	Meets Requirement?
A. TOP MANAGEMENT SUPPORT	
Policy Statements	
From agency	☐
From facility directors	☐
Supervisor and worker awareness	☐
Program Documentation	
From agency	☐

Requirement	Meets Requirement?
From facility	☐
Supervisor & worker awareness	☐
Participation by Top Management	
At the agency	☐
At the facilities	☐
Accountability	
Managers & supervisors evaluated on their occupational S&H performance	
At the facilities	☐
Supervisors correct hazards and enforce safety and health standards, rules and regulations	☐
Resources	

Requirement	Meets Requirement?
Sufficient safety & health staff	
At the central office	☐
At the VISNs	☐
At the facilities	☐
Safety and health staff qualified	
At the VISNs	☐
At the facilities	☐
Adequate financial resources	
At the agency	☐
At the VISNs	☐

Requirement	Meets Requirement?
B. PROGRAM PLANNING	
Clear, Measurable Goals and Objectives	
From the agency	☐
From the VISNs	☐
From the facility director	☐
Goals related to problems identified through the management information system	☐
Management Information System	
Facility supplies injury/illness statistics to headquarters	☐
C. PROGRAM IMPLEMENTATION	
Employee Rights and Involvement	
Agency consults with employee representatives	
At the agency	☐

Requirement	Meets Requirement?
At the facility	☐
Poster w/DOL core text displayed	☐
Employees can easily review the Act, Executive Order 12196, 29 CFR Part 1960, and the agency's program	☐
Written procedures for workers to report hazards anonymously	☐
Workers aware of procedures to report hazards anonymously	☐
When workers report hazards, they are notified of actions taken within required timeframes	☐
Log of worker reports maintained	☐
Workers are authorized official time to participate in the OSH program	☐

Requirement	Meets Requirement?
Worker awareness of occupational safety and health promoted through normal informational channels	
By the agency	☐
By the facility	☐
Reprisal Policy and Procedures	
Reprisal policy and procedure has been established by the agency and the facility	☐
Employees are aware that they are protected from reprisal for exercising their occupational safety and health rights	☐
Training	
Training provided to top managers on requirements of the agency program, OSH Act, Executive Order 12196, 29 CFR 1960	☐

Requirement	Meets Requirement?
Supervisor training (OSH Act, Executive Order 12196, 29 CFR 1960, OSHA standards, reporting and investigating allegations of reprisal, reporting, supervisor training evaluating abating hazards, & hazard recognition)	☐
Training for collateral duty safety and health personnel hazard recognition, OSHA standards, reporting & investigating allegations of reprisal, the OSH Act, Executive Order 12196, 29 CFR 1960, etc.)	☐
Training for workers on hazards of their jobs, the agency's OSH program including rights & responsibilities, use of PPE, safe operating procedures	☐
Training provided to employee representatives---introductory and specialized OSH courses, training to assist in conducting inspections	☐

Requirement	Meets Requirement?
Training provided to inspectors/safety specialists on standards, use of testing procedures, hazard recognition & abatement, data analysis & report preparation	
VISN inspectors	☐
Facility inspectors	☐
Recordkeeping	
Log of injuries & illnesses	☐
Summary posted for 30 days beginning within 45 days after the close of the fiscal year	☐
In addition to the log, agencies are to complete the OWCP forms within 6 working days	☐
Inspections	
Inspections by next higher level of agency, if applicable	☐

Requirement	Meets Requirement?
Facility inspections -- written procedures, appropriate frequency	☐
High risk areas identified & inspected more frequently	☐
Baseline Industrial Hygiene assessments as appropriate	☐
Outside assistance ever requested by site?	☐
Inspectors' qualifications--- recognizing hazards	☐
Investigations of occupational facilities or accidents requiring hospitalization of five or more employees	☐
Inspectors review hazard reports, injury/illness records, previous inspection reports	☐

Requirement	Meets Requirement?
Inspectors question employees or supervisors privately	☐
Inspectors are provided necessary equipment	☐
Inspectors issue Notices of Unsafe or Unhealthful Working Conditions; they are appropriately posted	☐
Employee representatives accompany inspectors	☐
A closing conference is conducted with the official in charge and workers representatives	☐
Hazard Abatement	
Written abatement procedures	☐
Abatement dates are set & met	☐

Requirement	Meets Requirement?
Required procedures are followed when abatement cannot be achieved in time limits	☐
Procedures for tracking abatement	☐
Imminent danger conditions abated immediately	☐
Assurance that private contractors do not expose Federal employees to unsafe conditions	☐
Standards Compliance & Adoption	
General compliance	☐
Any special standards have been approved by the Secretary of Labor	☐

Requirement	Meets Requirement?
D. PROGRAM EVALUATION	
Facility participation in program evaluation	
Evaluation by headquarters	☐
Feedback from headquarters	☐