

April 19, 2011

**AUTOMATED SAFETY INCIDENT SURVEILLANCE
AND TRACKING SYSTEM (ASISTS)**

1. PURPOSE: This Veterans Health Administration (VHA) Directive provides policy and guidelines for the implementation of the Automated Safety Incident Surveillance and Tracking System (ASISTS), VHA's safety incident management system for employees. *NOTE: It supports the recordkeeping mandates required by title 29, Code of Federal Regulations (CFR) Parts 1904 and 1960 (Subpart I) and the electronic submission of workers claims to the Department of Labor (DOL), Office of Workers Compensation Programs (OWCP).*

2. BACKGROUND

a. In 1996, the Under Secretary for Health determined that enhancing VHA's ability to manage data and information on work-related traumatic injuries and illnesses was critical to improving the health and safety of VHA employees; this led to the development of ASISTS. In June 1999, VHA issued ASISTS with the Needle Stick Tracking Module requiring that the system be used to track employee incidents and exposures to blood borne pathogens from needle sticks and sharps. A 2001 VHA policy required ASISTS be used to transmit the electronic submission of Form CA-1, Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation, and Form CA-2, Notice of Occupational Disease and Claim for Compensation. Directive 2006-033, OSHA Reporting and Recordkeeping of Work Related Illnesses and Injuries Utilizing the Automated Safety Incident Surveillance and Tracking System, was issued to comply with 29 CFR 1904.

b. Implementation has shown that ASISTS documentation provides information to the: injured employee; supervisor; occupational health and safety, workers compensation (WC) staff members; and union officials. Benefits include more rapid assessment and filing for compensation claims and improved data availability for program evaluation, planning, and intervention.

c. Use of ASISTS has dramatically improved VHA's performance on Federal Safety, Health, and Return to Employment (SHARE) goals as defined by the White House. In addition, ASISTS is used to track pertinent Veterans Integrated Service Network (VISN) Director Performance Monitors.

d. The electronic submission of Form CA-1 and Form CA-2 to DOL by VHA facilities is the basis for determining benefits that VHA employees receive as a result of their Federal Employees' Compensation Act (FECA) claims. It is essential that these submissions be consistent from one VHA facility to another and are submitted, using the ASISTS software program, to DOL-OWCP in accordance with DOL/GOVT1 System of Records and the Privacy Act of 1974.

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e. Continued training of VHA employees, employee representatives, supervisors, WC program managers, and others on the use and capability of the ASISTS database is critical because of turnover among staff.

f. ASISTS data provides a valuable incident database that can be evaluated to identify potential causes and trends of injuries by facilities. Data from all facilities can then be compiled for comparison purposes and statistical analyses. Compiled data are accessible through ASISTS data cubes on the VHA Support Service Center (VSSC) intranet site at: <http://vssc.med.va.gov>.

g. A substantial benefit of the ASISTS program is found in accident prevention. ASISTS relies on the Department of Veterans Affairs (VA) Form 2162, Report of Incident, to record the supervisor's first report of injury, which includes a text description of the causes of injury. This description, prepared by the supervisor must include the contributing factors and preventable aspects of injuries. These reports are made available to the Accident Review Board (ARB).

h. ASISTS training is available from a number of sources including a Supervisor video, a training CD-ROM, and Web-based training on the Occupational Safety and Health Administration (OSHA) recordkeeping and reporting requirements at: <http://vaww.ceosh.med.va.gov/>. *NOTE: This is an internal Web site and is not available to the public.*

(1) Recordkeeping changes for Federal agencies are cited in 29 CFR Part 1904, which can be located on the Veterans Health Information Systems and Technology Architecture (Vista) Web site at: <http://vaww.vistau.med.va.gov/vistau/asists/default.htm>. *NOTE: This is an internal Web site and is not available to the public.*

(2) The CD-ROM training provides both detailed information on data entry to ASISTS that is for completing electronic submission of Form CA-1 and Form CA-2 to DOL-OWCP.

(3) There are also user and technical manuals maintained by the VHA Center for Engineering and Occupational Safety and Health (CEOSH). These tools, references, and training materials may be accessed through the CEOSH VA Intranet Web site at: <http://vaww.ceosh.med.va.gov/Default.shtml>. *NOTE: This is an internal Web site and is not available to the public.* ASISTS training and reference materials can be easily located by entering ASISTS in the 'Search' window set to the CEOSH Web.

i. ASISTS complements VA's WC Management Information System (MIS), used for WC case tracking and management across VA. WC-MIS has been expanded to include some, but not all, mandatory safety reporting requirements. ASISTS use supports mandatory record-keeping requirements under 29 CFR 1904 and 1960. These include the OSHA 300 log, OSHA needle stick log, and OSHA 300A summary. ASISTS also allows calculation of the Days Away from Work, Restricted Work or job Transfer Injury and Illness" (DART) rate and the Total Case Rate of cases placed on the OSHA log, which differs from those as defined by the WC case criteria.

3. POLICY: It is VHA policy that all VHA facilities must use ASISTS to record workplace injuries and illnesses.

4. ACTION

a. **Office of Occupational Safety and Health and Environmental Compliance (10NS).**

The Office of Occupational Safety and Health and Environmental Compliance is responsible for appointing the ASISTS Safety Program Manager assigned to the Center for Engineering and Occupational Safety and Health (CEOSH).

b. **Office of Occupational Health (13D).** The Office Occupational Health is responsible for appointing the National Program Manager for Workers' Compensation Program in VHA as the ASISTS subject matter expert.

c. **ASISTS Safety Program Manager and National Program Manager for Workers' Compensation Program.** The ASISTS Safety Program Manager and National Program Manager for Workers' Compensation Program are responsible for working in collaboration to:

(1) Ensure that all ASISTS VISN Coordinators are trained in the current ASISTS program.

(2) Educate all stakeholders when updates to ASISTS are approved.

(3) Ensure that all stakeholders are aware of the confidentiality and privacy issues of this intricate Safety Incident Management system.

(4) Hold monthly conference calls with the stakeholders to discuss training, issues, or concerns.

d. **VISN Director.** Each VISN Director is responsible for:

(1) Designating a VISN ASISTS Coordinator, and ensuring VISN ASISTS Coordinator receives initial and updated training, as necessary.

(2) Ensuring all required training is provided by the VISN ASISTS Coordinator.

(3) Maintaining a VISN-wide plan for implementing the electronic submission of Form CA-1 or Form CA-2, by VHA facilities. This includes:

(a) Quarterly updates on VISN-wide training plans for VHA facility employees and supervisors in the use of ASISTS, to include training in computer skills, as necessary, for VHA facility employees to effectively use ASISTS.

(b) Developing quality assurance programs to measure the effectiveness of VHA facilities' use of ASISTS for the electronic submission of Form CA-1 and Form CA-2.

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(c) Ensuring electronic signature functionality is provided for all employees at VHA facilities.

(d) Assessing the need at VHA facilities for additional computer hardware and software necessary to permit all VHA facility employees the computer access to effectively input information and utilize the appropriate employee menu functionality of ASISTS.

(e) Developing a schedule at each VHA facility to phase out the paper submission of these forms to the DOL-OWCP.

(f) Ensuring that the most current ASISTS version or patch is installed at each VHA facility and is actively being utilized.

(g) Ensuring timely, appropriate, and accurate OSHA Recordkeeping documentation is maintained in order to calculate the Total Case Rate and the DART rate for each facility on the Classify Incident Outcome option of the Safety menu.

e. **VISN ASISTS Coordinator**. Each VISN ASISTS Coordinator is responsible for the training of VHA employees, employee representatives, supervisors, WC program managers, and others on the use and capability of the ASISTS database.

f. **Facility Director**. Each facility Director, or designee, is responsible for:

(1) Ensuring that ASISTS is used to record injuries and illness subject to reporting under 29 CFR Parts 1904 and 1960 (Subpart I);

(a) VHA facilities must electronically transmit each Form CA-1 or Form CA-2 to DOL-OWCP using the ASISTS database via the Austin Information Technology Center (AITC) by use of the Electronic Data Interchange (EDI).

(b) When it is not possible to transmit the electronic submission of an employee's Form CA-1 or Form CA-2 using ASISTS, the facility's contingency plan goes into effect. Notification to the VISN Workers Compensation Coordinator (WCC) must be made within 24 hours due to lack of electronic transmission of Form CA-1 or Form CA-2 and its causation. ***NOTE: The VISN WCC reports these disruption events to the VHA National Program Manager, Workers Compensation.***

(2) Appointing an individual to manage the WC aspects of ASISTS, including the electronic submission of Form CA-1 or Form CA-2 to DOL. VHA facilities that have a WC Program Manager position must appoint this individual to manage the WC aspects of ASISTS; and ensuring the VHA National Program Manager, WC Program, is notified of any changes in this appointment.

(3) Ensuring that Form CA-1 or Form CA-2 personal identifiers remain under the control of the Workers Compensation Program except as allowed for Accident Review Boards (ARB) under the 'routine use' provisions of Privacy Act of 1974 (see Systems of Records DOL/

GOVT-1).

(4) Ensuring that the latest version of ASISTS is installed at the facility and is actively being used.

(5) Ensuring that all employees have access to computers, as needed, to receive employee bulletins regarding occupational injuries and input information required by the employee menu portion of ASISTS.

(6) Ensuring all workers who must use ASISTS to collect and report OSHA and DOL workplace injury and illness information complete required ASISTS training on reporting worker reported incidents.

(7) Implementing training programs as required by VISN-wide training plans to meet the ASISTS training needs of employees and supervisors at the facility.

(8) Ensuring that training and information is provided to employees concerning the reporting of any potential injury or illness that might result from their VHA employment. Employees must be informed to enter required Form CA-1 and Form CA-2 information into ASISTS regarding incidents of occupational injury and illness that is needed for electronic submission of to DOL-OWCP.

(9) Ensuring that supervisors complete VA Form 2162, Report of Accident, at a minimum when the incident results in lost time or serious injury. To complete Form 2162, supervisors investigate and identify the root cause of the incident, and identify potential corrective actions. Supervisors must include the information specified in Attachment A, in the supervisor's section of VA Form 2126. *NOTE: The Supervisor may consult with the Facility Safety Manager in completing the report.*

f. **WC Program Manager or Individuals Appointed to Manage the WC Portion of ASISTS.** The WC Program Manager, or individuals appointed to manage the WC portion of ASISTS, is responsible for:

(1) Reporting, accurately, injury and illness data for medical and dental residents according to the resident's disbursement agreement contract.

(a) If a resident is paid through a disbursement agreement contract that includes workers compensation coverage by their employer, then Form CA-1 and Form CA-2 data should not be transmitted to the DOL-OWCP. The resident's injury information must be provided to the disbursing agent or university program director in a timely manner, such that the disbursing agent or university program director may evaluate and report the resident's injury or illness as necessary. All injury or illness information provided to the resident's employer must be protected under the appropriate privacy regulations and requirements.

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(b) If the resident is not paid through a disbursement agreement contract that includes workers compensation coverage by their employer, and VA provides for their workers compensation, then Form CA-1 or Form CA-2 must be submitted to DOL-OWCP by the facility.

(c) ASISTS must be used to collect and track all occupational injury and illness of medical and dental residents and students, regardless of whether injury and illness data is transmitted to DOL-OWCP by VA or sent to the resident's employer.

(2) Ensuring that a printed copy of the completed Form CA-1 or Form CA-2 is signed in blue ink by the employee, supervisor, and any witnesses prior to electronic transmission of the forms to DOL.

(3) Providing Employees with a printed (hard) copy of the signed Form CA-1 or Form CA-2.

(4) Ensuring the original Form CA-1 or Form CA-2 document with signatures in blue ink is filed at the facility WC office in accordance with DOL-OWCP requirements before electronic transmission.

(5) Ensuring timely submission of the completed Form CA-1 or Form CA-2 within the mandated timeframe of 10 business days.

g. **Facility Safety Manager.** The facility Safety Manager is responsible for:

(1) Assisting the ARB in grouping incidents for reviews;

(2) Assisting the Supervisor, as needed, in completing VA Form 2162 (see Att. A);

(3) Completing the investigation in a timely manner when the incident investigation and root cause analyses of the incident can not be completed within the 5-day requirement for completing VA Form 2162; and

(4) Providing the investigation results to the ARB.

h. **Immediate Supervisors.** Immediate supervisors are responsible for:

(1) Filing VA Form 2162 when they become aware of a worker's work related injury or illness.

(2) Completing VA Form 2162 within 5 days after notification by an employee who reports the incident.

(3) Closing VA Form 2162 in ASISTS when the incident investigation is complete.

(4) Attending reinforcement training on Privacy Act requirements and VA Privacy policy.

NOTE: This is necessary to ensure the narrative summary and corrective action segments of the

investigation on VA Form 2162 do not contain any personal identifiers of employees, patients, or Veterans.

5. REFERENCES

- a. Privacy Act of 1974.
- b. DOL/GOVT1 Privacy Act for FECA Claims.
- c. VHA Handbook 7701.01.
- d. Title 29 CFR Part 1960.
- e. Title 29 CFR Part 1904.

6. FOLLOW-UP RESPONSIBILITY: The Director of Safety, Health Environmental and Emergency Management (10NS) is responsible for VHA facility programs related to this Directive. The 10NS POC is the ASISTS Safety Program Manager at (479) 444-4080, or contact the 13D POC National Workers Compensation Program Manager at (512) 326-6557. The Strategic Health Group for Occupational Health, Safety, and Prevention (13D) provides support for the VHA system-wide ASISTS database: contact the 13D POC concerning the database. Questions on whether medical and dental residents are paid through a disbursement agreement that includes WC or paid directly by VA may be referred to the facility Associate Chief of Staff for Education or the VHA Office of Academic Affiliations, at (202) 461-9490.

7. RESCISSION: VHA Directive 2001-032 is rescinded. This VHA Directive expires on April 30, 2016.

Robert A. Petzel, M.D.
Under Secretary for Health

Attachments

DISTRIBUTION: E-mailed to the VHA Publications Distribution List 4/21/2011

ATTACHMENT A

**REQUIRED INFORMATION FROM THE SUPERVISOR ON DEPARTMENT OF
VETERANS AFFAIRS (VA) FORM 2162, REPORT OF INCIDENT**

1. Who was involved?

This includes identifying people both directly involved (injured or eye witnesses) and those that may be able to contribute useful information about facts surrounding the incident (e.g., supervisors, trainers, peers, etc.).

2. What happened?

What was the worker doing when the incident occurred, note the equipment involved, the processes and tasks being performed, and the control systems in place.

3. When (Time Factors) did the incident occur?

The time and date that the incident was noticed or was claimed to have occurred? The time the person involved reported to work that day? Was the time of day or length of duty that day a factor?

4. Where did the incident occur?

Describe the location and indicate if there any aspects of the environment that may have contributed to the incident. Indicate if previous incidents occurred in this particular area (within 3 years). What was the investigation outcome for any previous incidents?

5. How and why the incident occurred?

Describe anything unusual about the event. Consider how the incident could have been prevented? This thought process may lead to the direct cause of the incident. Indicate factors that contributed to the incident including:

- a. Employee training;
- b. Employee experience in performing the task (if task was a factor);
- c. Equipment failures;
- d. Effectiveness of safety procedures in place (policies and procedures);
- e. Training adequacy;
- f. Following of training and procedures by the by persons involved; and
- g. Fatigue (shift work, duration of shift, etc).

ATTACHMENT B

**AUTOMATED SAFETY INCIDENT SURVEILLANCE AND TRACKING SYSTEM
(ASISTS) TRAINING OPPORTUNITIES AND WEB SITES**

1. Automated Safety Incident Surveillance and Tracking System (ASISTS) and the Occupational Safety and Health Administration (OSHA) 300 Recordkeeping Mandates: <http://www.osha.gov/recordkeeping/index.html>
2. OSHA Log Technical Manual – Patch 7 of ASISTS, found at: http://vaww.vistau.med.va.gov/Documents/ASISTS/ASISTS_OOPS2_0RN_PATCH7_FC_0808.pdf. *NOTE: This is an internal Department of Veterans Affairs (VA) web site not available to the public.*
3. ASISTS USER’S MANUAL, found at: http://vaww.vistau.med.va.gov/Documents/ASISTS/ASISTS_um_FC_0908.pdf. *NOTE: This is an internal VA web site not available to the public.*
4. ASISTS FLOWCHART, found at: http://vaww.vistau.med.va.gov/Documents/ASISTS/ASISTS_flowchartApr03_FC_0808.pdf. *NOTE: This is an internal VA web site not available to the public.*
5. ASISTS WEB-BASED TRAINING, found at: <http://vaww.vistau.med.va.gov/vistaU/asists/wbt/APPLICATION/text.cfm>. *NOTE: This is an internal VA web site not available to the public.*