GSA ORDER

SUBJECT: General Services Administration Occupational Safety and Health Program

1. Purpose. This Order establishes policy and procedures for the General Services Administration (GSA) Occupational Safety and Health (OSH) Program for internal GSA agency operations. The purpose of the program is to ensure that GSA workplaces and work environments are free from recognized hazards that are likely to cause injuries or illnesses.

2. Authority. Federal executive branch occupational safety and health program requirements are mandated by the following:


   b. Executive Order 12196, Occupational safety and health programs for Federal employees (“E.O. 12196”), and


The above requirements were issued in succession and 29 CFR 1960 contains the requirements mandated in the preceding OSH Act and E.O. 12196. Therefore this Order is based on compliance with 29 CFR 1960.

3. Background. Several GSA organizations are responsible for safety and health aspects of the GSA mission. Since the 1980s, the Public Building Service (PBS) has managed and implemented the GSA OSH Program for employees as a component of its facility safety, health, and environmental management program. This Order establishes the GSA OSH Program for employees of GSA and places responsibility for the management and oversight of that program in the Office of Administrative Services (OAS). This Order reflects the assignment of roles, responsibilities, and procedures for the GSA OSH Program as a part of GSA’s overall safety and health responsibilities as listed below:
a. OAS is responsible for managing the GSA-wide employee OSH Program, as described in this Order.

b. PBS implements a program that ensures compliance with safety and health requirements of space provided to the Federal community, including GSA occupants. It also includes risk management aspects that protect against tort claims or financial losses and mission impacts due to Federal property losses in what is commonly known as general liability and property loss liability. This program is typically referred to as the PBS “Facility Safety and Health” program and is mandated by Section 1-602 of Executive Order 12196 and 29 CFR 1960 Subpart E.

PBS also continues to provide regional technical safety and occupational health implementation of the OSH Program. In addition, PBS manages the National Fire Protection Engineering Program which overlaps with the OSH Program in 29 CFR 1910 Subpart E and 29 CFR 1926 Subpart F.

c. The Federal Acquisition Service (FAS) implements programs that ensure compliance with safety and health requirements of products and services FAS provides to the Federal community, including to GSA users as mandated by 29 CFR 1960 Subpart E.


e. The Office of Mission Assurance (OMA) implements programs related to the GSA OSH Program such as emergency preparedness, security, workplace violence prevention and situational awareness.

f. The GSA Office of Human Resources Management (OHRM) Workers' Compensation Program Office administers a program that provides benefits to GSA employees that experience a work-related injury or occupational disease. OHRM routinely utilizes OSH injury and illness information to assist in the adjudication of workers' compensation claims.

4. Scope. This Order implements the OSH responsibilities of GSA as a Federal agency in its role as a Federal employer, specifically GSA’s responsibility for the GSA workforce within internal GSA agency operations. While those responsibilities will often involve workspace, materials, and equipment, the OSH responsibility involves more than those aspects alone. It includes considering the operations and work activities GSA employees perform, how they perform work (work practices), as well as how the space, materials, and equipment along with work operations integrate to form a work environment that impacts employee safety and health. The employee OSH Program also involves many administrative functions appropriately managed by OAS entities. GSA's OSH Program is defined by the agency-employee relationship and thus covers GSA Federal employees only. The following exclusions apply:
a. Other Federal agencies utilizing or residing in GSA-controlled space, or using GSA supplied products, materials, equipment, or services are responsible for providing appropriate OSH programs as Federal employers for their agency employees that meet OSHA requirements, as required by 29 CFR 1960 and E.O. 12196.

b. GSA contractors as well as non-Federal public agencies or private sector outlease tenants must comply with their OSH responsibilities for their employees relative to their industry and typically found in Title 29 CFR or in State or local regulations.

6. Applicability.

a. The policies and guidelines in this Order apply only to GSA employees. All work locations are applicable including GSA-owned facilities, leased facilities, telework, and temporary duty (travel) work environments. Contractors and employees of other agencies are not covered by this Order.

b. Bargaining unit employees also are governed by the collective bargaining agreement of the National Federation of Federal Employees (NFFE) or American Federation of Government Employees (AFGE), available at GSA InSite. Where provisions of the collective bargaining agreement are in conflict with this Order, the provisions of the collective bargaining agreement apply.

7. Cancellations and Form Changes.

a. ADM P 5940.1A is cancelled.


c. GSA Form 3614, GSA Notice of Unsafe/Unhealthful Workplace Conditions, is cancelled and replaced by Appendix G-1, Hazard/Deficiency Report.

d. GSA Form 3620, Report of GSA Property Damage or Non-GSA Employee Personal Injury, is no longer used by this Order. [Note: This form may still be in use by other GSA organizations.]

e. GSA Form 3623, Supervisor's Supplemental Report of GSA Employee Injury/Illness, is cancelled. GSA utilizes OSHA Form 301, Injury and Illness Incident Report for this purpose as described in Appendix B of this Order.
f. GSA Form 3624, Log of Federal Occupational Injuries and Illnesses, is cancelled. GSA uses OSHA Form 300, Log of Work-Related Injuries and Illnesses for this purpose as described in Appendix B of this Order.

8. Nature of Revision. The revisions in this Order:

   a. Reflect regulatory changes to 29 CFR 1960 and 29 CFR 1904 (Occupational Safety and Health Administration);

   b. Account for the OSH Program transfer from PBS to OAS;

   c. Identify OSH functions of OAS and supporting GSA organizations;

   d. Describe employee, supervisory and Service and Staff Office (SSO) responsibilities; and

   e. Include descriptive appendices for the key administrative program areas.

9. Policy. It is the policy of GSA to:

   a. Implement an OSH program that exceeds mandated minimum requirements;

   b. Embrace a risk management philosophy that provides an optimum degree of safety and health within operational and budgetary limitations;

   c. Integrate occupational safety and health into GSA’s mission, strategic plan, and business line processes; and

   d. Promote a culture of employee participation in the GSA OSH Program.

10. Signature.

    /S/
    EMILY W. MURPHY
    Administrator
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GSA Occupational Safety and Health Program

1. Roles and Responsibilities.

   a. Office of Administrative Services (OAS).

      (1) Chief Administrative Services Officer:

          (a) Is delegated the authority by the GSA Administrator for the management and administration of the GSA OSH Program and serves as the GSA Designated Agency Safety and Health Official (“DASHO”),

          (b) Establishes GSA-wide program goals and measures effectiveness of program regularly,

          (c) Ensures that OSH goals and metrics are included in the GSA Strategic Plan and appropriate business line metrics, and

          (d) Ensures the OSH program is appropriately resourced.

      (2) Director of Workplace Management Services:

          (a) Implements the GSA OSH Program on behalf of the DASHO,

          (b) Appoints the GSA Agency OSH Manager, and

          (c) Budgets for the resource needs of the GSA OAS headquarters OSH Program, and

          (d) Ensures that regional and zonal Workplace Management Services offices provide support to the OSH program as required in this Order.

      (3) GSA Agency Occupational Safety and Health (OSH) Manager:

          (a) Manages and administers the GSA Safety and Occupational Health Program;

          (b) Establishes a set of procedures that ensures effective implementation of the GSA OSH Program as required by Section 19 of the OSH Act, E.O. 12196, 29 CFR 1960, and other OSHA program elements promulgated by the Secretary of Labor;

          (c) Advises the GSA DASHO and other management officials to assist them in carrying out their safety and occupational health duties and responsibilities;
(d) Informs employees of the GSA OSH program and of the protection extended to employees through the program, including ensuring the posting of all OSHA-required information and forms in a prominent location within the designated time frame;

(e) Coordinates and compiles GSA’s Annual Occupational Safety and Health Report to the Secretary of Labor including an OSH program self-evaluation;

(f) Develops and submits the agency’s previous calendar year record-keeping information on occupational injury and illnesses to the Bureau of Labor Statistics (BLS) and OSHA on an annual basis;

(g) Responds to inspections by OSHA by requesting informal conferences, filing Appeal Requests and signing Informal Settlement Agreements.

(h) Reviews and analyzes national workplace inspection/assessment reports; ensures inspection/assessment protocols meet the OSH program needs and criteria; and analyzes findings for trends in compliance, commonality of findings, and progress in achieving program goals;

(i) Investigates and resolves employee reports of hazards or alleged hazards, maintaining confidentiality when reported hazards cannot be agreed upon or resolved at the local level;

(j) Ensures the DOL Employees’ Compensation Operations and Management Portal (eCOMP) system is used by the agency to record all injuries and illnesses. Analyzes national employee injury and illness data for trends;

(k) Schedules and chairs quarterly national OSH committee meetings in accordance with NFFE and AFGE labor-management agreements;

(l) Maintains communication with GSA subject matter experts (SMEs) that support the GSA OSH program to discuss safety and occupational health matters and continuously improve the OSH program. Involves SMEs in the OAS national OSH program for succession planning purposes;

(m) Liaises with DOL, OSHA, the Federal Advisory Council on Occupational Safety and Health, the Field Federal Safety and Health Council, and private and public safety and health organizations;

(n) Coordinates agency participation at national safety and health conferences. Maintains professional qualifications through continuing education and training; and
(o) Assesses GSA safety and occupational health training needs, develops agency-wide training strategies, and coordinates course development in partnership with OHRM. Coordinates safety and occupational health training for the agency.

(4) OAS Regional Supervisors and Zone Directors:

(a) Coordinate quarterly regional OSH Committee meetings. Solicit input and participation from regional SSOs. These meetings may be combined with Tenant Board meetings;

(b) Post OSH information provided by the Agency OSH Manager on the regional OAS InSite page;

(c) Advise the Agency OSH Manager of safety and health concerns that impact or potentially impact regional or zonal OAS services;

b. Heads of Service and Staff Offices (HSSOs). The following is required of all national and regional HSSOs:

(1) General program support:

(a) Provides active leadership for the GSA OSH Program within and throughout organizations under their responsibility;

(b) Informs employees of the GSA OSH Program and protection afforded employees under the program;

(c) Ensures that operations under their authority are in compliance with all applicable occupational safety and health standards that employee work environments are free from recognized hazards that may cause or are likely to cause injuries or illnesses;

(d) Ensures that adequate funding is budgeted and available to implement their responsibilities under the GSA OSH Program, including provision of appropriate personal protective clothing and equipment (PPE), training, mitigation of hazards, and program administration; and

(e) Ensures that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthy working condition.

(2) Specific program implementation:

(a) Ensures that supervisors protect the safety of employees by identifying hazardous conditions, informing employees of the hazardous conditions, and correcting them as promptly as possible or managing hazard abatement through appropriate plans and mitigation, including establishment of interim controls to reduce or eliminate
compliance issues or hazard risks as needed;

(b) Ensures supervisors give immediate attention to employee reports of alleged unsafe or unhealthful working conditions;

(c) Ensures that supervisors develop and implement OSH training as needed to protect employees from job-specific hazards, including developing specific risk mitigation strategies for SSO work environments and/or operations.

(d) Ensures that supervisors record all occupational injuries and illnesses in the GSA eCOMP system in accordance with Appendix B and investigate all occupational injuries and illnesses in accordance with Appendix C;

(e) Ensures supervisors report all occupational-related fatalities and in-patient hospitalizations, amputations, and losses of eye(s) to the Agency OSH Manager and DASHO immediately and to OSHA within the prescribed time frame in accordance with Appendix B; and

(f) Provides a copy of any violations received from Federal OSHA inspections to the Agency OSH Manager within three (3) working days of receiving the OSHA Notice of Unsafe or Unhealthy Working Condition. Where available, provides copies of any violations issued to GSA contractors by State OSHA offices.

c. Specific Service and Staff Office (SSO) Roles and Responsibilities. The following specific requirements are in addition to the requirements of paragraph 1.b.

(1) Office of Human Resources Management (OHRM):

(a) Develops safety and occupational health Online University training modules from content developed by OAS;

(b) Integrates safety and occupational health training content developed by OAS into new employee and new supervisor training courses;

(c) Maintains training records and makes such information available to OAS;

(d) Provides training data in electronic format to the Agency OSH Manager for monitoring of OSH compliance;

(e) Oversees the GSA workers’ compensation program in accordance with the Federal Employees’ Compensation Act (FECA) and 9810.1 HCO P, Injury Compensation (Appendix K, Reference (i));

(f) Manages GSA’s eCOMP system;
(g) Establishes policy to ensure that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthy working condition or for participating in agency OSH program activities. Ensures all agency employees are aware of this policy and how to exercise their rights under the policy. Ensures occupational safety and health responsibilities are included in position descriptions as appropriate;

(h) Ensures occupational safety and health sub-elements are included in managers’ and supervisors’ performance plans; and

(i) Provides input to the Agency OSH Manager for preparation of the GSA annual OSH report to DOL.

(2) Office of Mission Assurance. The Office of Mission Assurance (OMA) is responsible for the following safety and safety-related programs:

(a) Emergency preparedness, including the GSA National Pandemic Plan and situational awareness information;

(b) In instances where GSA has been determined the primary occupant agency of a facility and GSA is assigned the role of the Designated Official (DO) as per Federal Management Regulation (FMR) Part 102-74, OMA is the technical advisor to the DO in developing the Occupant Emergency Plan;

(c) Physical security;

(d) Workplace violence prevention; and

(e) Situational awareness information.

(3) Public Buildings Service (PBS):

(a) Provides safe and healthy facilities in accordance with 29 CFR 1960 Subpart E and 41 CFR 102-80;

(b) Addresses safety and health in facility design, construction, and operations;

(c) Complies with Occupant Emergency Plan (OEP) requirements;

(d) Develops Fire Protection Plans and Emergency Action Plans when required by an OSHA standard. (See 29 CFR 1910 Subpart E for requirements.) Coordinates the scheduling and execution of appropriate drills and training for these plans; and
(e) Provides technical safety and occupational health support to OAS as necessary to reduce employee OSH risks and improve the agency safety program. Responsibilities include:

1. Scheduling and completing annual OSH inspections/evaluations of GSA work environments in accordance with Appendix D. Enters OSH inspection findings on the GSA “Hazard/Deficiency Report” in accordance with Appendix F and Appendix F-1,

2. Tracking hazards identified by employee reports of unsafe/unhealthful working conditions (Appendix A), accident investigations (Appendix C), OSH assessments (Appendix D), or other reports (Appendix F) to ensure abatement by the responsible SSO is documented; and

3. Ensures an OSHA Record Keeper (ORK) is assigned in each region to review and process reports of injuries and illnesses as required in Appendix B.

4. Provide input to the Agency OSH Manager for preparation of the GSA annual OSH Report to DOL.

(4) Federal Acquisition Service (FAS):

(a) Provides products and services to Federal agencies that meet the requirements of 29 CFR 1960 Subpart E.

(b) Provides input to the Agency OSH Manager for preparation of the GSA annual OSH Report to DOL.

d. Supervisors. All supervisors must:

(1) Inform employees of the GSA OSH Program and protection afforded employees under the program. Post all OSHA-required information and forms physically or electronically in a prominent location accessible to employees;

(2) Ensure that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthy working condition. Prohibit discrimination or retaliation related to OSH in their organizations;

(3) Furnish, to the extent of their authority, employees with employment and a place of employment that are free from recognized hazards that may cause or are likely to cause injuries and illnesses. Ensures the safety of employees under their supervision by identifying hazardous conditions, inform employees of the hazardous conditions, and correct them as promptly as possible;

(4) Ensure employee compliance with the occupational safety and health standards applicable to the activity being performed and with all rules, regulations, and
orders issued with respect to the GSA OSH Program;

(5) Address employee reports of alleged unsafe or unhealthful working conditions in accordance with Appendix B of this Order;

(6) Ensure that all workplace injuries and illnesses are electronically reported by GSA employees in DOL’s web-based program, eCOMP, at https://www.ecomp.dol.gov. Review and approve the information entered into eCOMP in accordance with Appendix B;

(7) Investigate, promptly, all incidents occurring in workplaces under their jurisdiction and submit accurate and timely accident reports. Report immediately all work-related fatalities, in-patient hospitalizations, amputations, and losses of an eye to the Head of Service and Staff Office (HSSO) and the Agency OSH Manager;

(8) Provide PPE to employees. Requires and monitors PPE use and maintenance when necessary to protect employees from identified hazards that cannot be eliminated through engineering solutions, substitution of materials or processes, or administrative or other engineering controls.

(9) Ensure best practices for OSH issues are integrated into operations under their control and that OSH topics are regularly communicated to all of their subordinates through informal safety meetings, emails, visuals or other communication methods; and.

(10) Encourage employee participation in appropriate OSH information sharing groups or local Field Federal Safety and Health Councils (FFSHCs).

e. GSA employees. All employees must:

(1) Read and ensure an understanding of this Order. Read and ensure an understanding of the safety sections of the AFGE and NFFE labor-management agreements, if applicable;

(2) Complete all required safety and occupational health training;

(3) Comply with the standards, rules, regulations, procedures, and orders issued by GSA under Section 19 of the OSH Act, E.O. 12196, 29 CFR 1960, and this Order that are applicable to their own actions and conduct;

(4) Use correct, safe procedures in all official activities. Use safety, PPE and other devices and procedures provided or directed by GSA. Ensure that employee-provided work environments such as home telework locations are maintained in a safe and healthy condition. Employees shall certify that home telework locations are "safe, secure, and suitable for teleworking activities" in accordance with 6040.1A HRM, GSA Workforce Mobility and Telework Policy (Appendix K, Reference (j)). Ensure that
Privately Owned Vehicles used for official GSA business are maintained in a safe operating condition;

(5) Take an active role in ensuring their jobs are performed with the most effective control of known or potential hazards;

(6) Report observed hazards to a supervisor, union representative, safety official, security, safety and occupational health committee, or directly to OSHA. (Note: GSA Employee Report of Unsafe or Unhealthy Working Conditions (Appendix A-1) may be used for this purpose). Report workplace injuries and illnesses in eCOMP, at https://www.ecomp.dol.gov/, in accordance with Appendix B;

(7) Carry out emergency responsibilities if so assigned. Follow Occupant Emergency Plan and Fire Plan procedures; and

(8) Employees shall be authorized official time to participate in the activities provided for in section 19 of the Act, Executive Order 12196, this part, and the agency occupational safety and health program.

2. Key OSH Program Areas.

a. Reporting unsafe and unhealthful working conditions. Changes in a work task or practice and/or unforeseen conditions can create safety and health deficiencies in existing work environments. As such, employees play a vital role in identifying and reporting potential issues as they arise. Appendix A addresses the steps that should be taken by employees to identify, report, and assist in correcting potential hazards. Appendix A-1 provides the form to be used for reporting unsafe/unhealthy working conditions and Appendix A-2 requires the format for maintaining the required log of reports.

b. Notification, recordkeeping, and reporting (NR & R) of Injuries and Illnesses. Documentation of injuries and illnesses is an important step to identifying and mitigating causes of work environment hazards and exposures. Appendix B addresses GSA’s criteria for internal notification, recording (recordkeeping), and where required, reporting to OSHA.

c. Accident, exposure, and incident investigation. In the event that an investigation is required for an accident, exposure, or incident, it is essential that the root cause(s) of the event be the focal point of the investigation. Doing so will maximize the opportunity to enact changes that increase the chances of reducing or eliminating the possibility of such events occurring in the future. Appendix C addresses the level of effort required for an investigation and how OSHA requirements are to be addressed.

d. Work environment inspections/assessments. Periodic assessments are necessary in order to verify that work environments are compliant with current safety and health standards. Appendix D redefines this practice as more than basic facility
inspections by including additional tasks that when combined with a facility inspection result in a workplace assessment. The appendix clearly defines the requirements of inspections and assessments, including the preparation and requirements, along with the necessary forms required for these tasks.

e. **Job safety analysis/job hazard analysis.** Compliance with OSH regulatory requirements is optimized through risk assessment. Essential to this is reviewing work environments to identify risk-based challenges to safety and health standards. A Job Safety Analysis/Job Hazard Analysis (JSA/JHA) can be used to identify and preemptively address potential hazards and issues for the purposes of mitigating or eliminating those concerns. Appendix E details the JSA/JHA assessment as well as other elements of a Risk Assessment and the expected benefits of conducting an assessment.

f. **Hazard/deficiency documentation and control.** While "hazard reports" are traditionally generated as a result of an inspection, a hazard or exposure may be identified by several means including JSAs/JHAs, employee reports, and incidents. The documentation and tracking of hazards is required by regulation and is used to notify employees of such hazards and ensure hazards are abated. Documentation is also useful for analysis purposes. Appendix F addresses the requirements for documenting and tracking hazards and also provides descriptions of the elements contained on the Hazard/Deficiency Report form (in Appendix F-1).

g. **Risk Assessment Matrix.** A Risk Assessment Matrix is used to analyze and assess the risk for tasks and conditions. The matrix compares the likelihood of occurrence with the severity of the consequence. Actions or events with a high likelihood(s) and severe consequence(s) are the most risky whereas those with low consequence and/or low likelihood present the least risk. Appendix G addresses how the Risk Assessment Matrix is to be used, how to determine both likelihood and consequences appropriately, as well as other considerations to be taken into account when analyzing safety. The end result is the Risk Level (RL) and the Risk Assessment Code (RAC) which gives a quantifiable risk value and abatement priority based on the previously discussed factors.

h. **Occupational safety and health training and communication.** Communication and training are vital elements in managing the various programs related to health, safety, and the environment to ensure that each program is properly understood and implemented to maximize their effectiveness. Appendix H addresses the various training and communication methods that best assist in efficiently implementing the various programs. A training module matrix that summarizes and maps out the minimum 29 CFR 1960 required training by job categories is included.

i. **Safety and occupational health committees.** Creating and utilizing committees allows for effective and consistent implementation of the necessary measures to promote safety and healthful environments. Through cooperative collaboration between management and the work staff, a more holistic and all-encompassing program can be
created to cover the needs of all parties. In Appendix I the membership requirements, purpose, and minimum scope requirements for such committees are addressed. The appendix additionally covers the standards and forms required for various elements of committee meetings and tasks.

The accompanying appendices contain the detailed requirements for the key GSA OSH Program areas. These appendices were designed to be applied in conjunction with the corresponding sections of 29 CFR 1960.
Appendix A. Reporting Unsafe and Unhealthful Working Conditions

1. **Purpose.** While GSA strives to eliminate hazards through safe design, safe operations, and periodic inspections, work environments are continually changing, presenting the possibility of new or previously unidentified hazards. Some of the best sources to identify these real or potential hazards are the employees themselves.

2. **Corrective Action.** This formal reporting process shall not preclude immediate corrective action in response to oral reports of hazardous conditions.

3. **Grievance/Collective Bargaining Agreement Impact.** Oral or written reports are not intended to interfere in any way with the prior, simultaneous, or subsequent use by any employee of any established grievance procedures or collective bargaining agreements as a means of requesting corrections of alleged unsafe or unhealthful working conditions.

4. **Reporting.** Employees have the right to report unsafe and unhealthful working conditions without fear of restraint, interference, coercion, discrimination, or reprisal. This Appendix does not preclude an employee from filing a separate complaint with OSHA at any time during the process. The report shall be reduced to writing either by the individual submitting the report or, in the case of an oral notification, by the individual's supervisor.

5. **Reporting Responsibilities.** Any GSA employee or representative of employees, who believes that an unsafe or unhealthful working condition exists in any work environment where such employee is employed, shall have the right and is encouraged to make a report of the unsafe or unhealthful working condition to his or her supervisor with a copy to the appropriate OAS OSH coordinator.

6. **Report Forms.** Written reports shall be submitted on the form specified in Appendix A-1. Reports are maintained and tracked by each supervisor either in hard-copy or electronic format.

7. **Identity Protection.** 29 CFR 1960.28(c) requires that reports contain the name of the submitting employee or representative. However, upon the request of the employee submitting the report, no person shall disclose the name of the employee making the report or the name(s) of employees referred to in the report. Specifically, E.O. 12196 mandates that agencies assure the right to anonymity of those making reports. Technically such reports are "unattributed" reports. However, the protection of employee identity is often confused with an "anonymous report". Anonymous reports (i.e., with no contact information) severely limit the agency's ability to obtain additional information to research, evaluate, and mitigate the reported condition. It should also be noted that reports submitted anonymously prevent providing a response to the submitter as otherwise required by paragraph 12 of this appendix.

8. **Report Logging.** Each report of an existing or potential unsafe or unhealthful working condition shall be recorded on a log in the format specified in Appendix A-2 shall be
used for this purpose. Reports are maintained and tracked by each HSSO either in hard-copy or electronic format.

9. **Report Distribution.** A copy of each report received shall be sent to the appropriate safety and health committee. When requested by at least half the members of a safety and occupational health committee, OSHA may initiate an inspection or other appropriate action.

10. **Inspections.** E.O. 12196, 1-201(h) requires that an agency conduct workplace inspections within 24 hours of employee reports of imminent dangers, within three (3) working days for potential serious conditions, and within 20 working days for other conditions. This inspection shall be facilitated by the supervisor in charge of the operation where the unsafe or unhealthy condition is claimed to exist. However, an inspection may not be necessary if, through normal management action and with prompt notification to employees and safety and health committees, the hazardous condition(s) identified can be abated immediately. OSHA may initiate an inspection whenever an alleged serious health or safety hazard is reported to them by an employee who has knowledge of the hazard. OSHA inspections do not negate the requirement for GSA inspections under 29 CFR 1960.

11. **Abatement.** Where the abatement of a confirmed hazard cannot be completed in 30 calendar days the abatement plan requirements of Appendix F shall apply. A copy of the abatement plan entry shall be provided in the response to the employee.

12. **Notification.** An employee submitting a report of unsafe or unhealthful conditions shall be notified in writing within 15 working days if the official receiving the report determines there are not reasonable grounds to believe such a hazard exists and does not plan to make an inspection based on such report. An agency's inspection or investigation report, shall be made available to the employee making the report within 15 working days after completion of the inspection, for safety violations or within 30 working days for health violations, unless there are compelling reasons for the delay.

13. **Appeals.**

   a. If the originator of a report is dissatisfied with the initial assessment of the alleged hazard or with action taken to abate a confirmed hazard, the employee is encouraged to discuss the matter with his or her supervisor.

   b. If the originator remains dissatisfied after such discussion, he or she may appeal up to their HSSO. The written appeal shall contain at least the following information:

      (1) A description of the alleged hazard including its location and standards violated, if known (a copy of the original hazard report shall suffice).

      (2) How, when, and to whom the original report of the alleged hazard was submitted.
(3) What actions (if known) were taken as a result of the original report?

(4) A statement explaining why the actions taken as a result of the original report were unsatisfactory and are being appealed.

c. If the employee is still dissatisfied with the response from the HSSO or has not received a response within 20 working days, he or she may appeal to the GSA DASHO.

d. While this appeal process encourages in-house resolution, GSA employees may, at any time, submit complaints alleging workplace hazards directly to the DOL OSHA. Employees do not have to exhaust their appeal chain of command before reporting a hazard to their local Federal OSHA Area Office, however, the Secretary of Labor encourages employees to use agency in-house hazard reporting procedures as they are usually the most expeditious means to achieve abatement. Reports to the DOL OSHA may serve as the basis for investigations or inspections by OSHA officials.
### Appendix A-1. Employee Report of Unsafe or Unhealthful Working Conditions

**GSA EMPLOYEE REPORT OF UNSAFE OR UNHEALTHY WORKING CONDITIONS**

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**SHOULD YOU CONSIDER THIS CONDITION TO BE AN IMMINENT DANGER, OR A TYPE THAT COULD CAUSE IMMEDIATE SERIOUS PHYSICAL HARM, PLEASE VERBALLY INFORM YOUR SUPERVISOR TO EXPEDITE CORRECTION.**

1. **(Check One)**
   - [ ] EMPLOYEE
   - [ ] EMPLOYEE REPRESENTATIVE
   - BELIEVES THAT A CONDITION IN THE WORKPLACE VIOLATES OCCUPATIONAL SAFETY AND HEALTH STANDARDS

2. **NAME OF SUPERVISOR AT SITE OF VIOLATION**
   - (a). TELEPHONE NUMBER OF SUPERVISOR AT SITE OF VIOLATION

3. **HAS THE EMPLOYEE REPORTED THIS CONDITION TO THEIR SUPERVISOR?**
   - [ ] YES
   - [ ] NO

4. **DESCRIBE THE HAZARD, INCLUDING MATERIALS AND EQUIPMENT INVOLVED AND THE APPROXIMATE NUMBER OF EMPLOYEES EXPOSED OR THREATENED BY THE CONDITION. INDICATE WHETHER YOU CONSIDER THE CONDITION □ IMMINENT DANGER, OR □ SERIOUS.**

5. **IF KNOWN, LIST OF REGULATIONS, CODE, AND/OR STANDARDS VIOLATED**

6. **HAS ANYONE ATTEMPTED TO CORRECT THE CONDITION? IF YES, GIVE DETAILS.**
   - (a). HAS ANYONE BEEN HURT, OR HAS PROPERTY BEEN DAMAGED AS A RESULT OF THIS CONDITION? IF YES GIVE DETAILS.
   - [ ] YES
   - [ ] NO

7. **I HAVE READ AND UNDERSTOOD THE REPORTING AND APPEAL PROCEDURES OUTLINED IN APPENDICES A and A-1 OF GSA ORDER ADM 5940.2.**
   - [ ] YES
   - [ ] NO

8. **MAY YOUR NAME BE REVEALED?**
   - IF NO IS CHECKED, YOUR NAME, ADDRESS, TELEPHONE NUMBER AND SIGNATURE WILL BE REDACTED FROM THIS FORM PRIOR TO ANY FORWARDING OR DISTRIBUTION.
   - [ ] YES
   - [ ] NO

9. **EMPLOYEE NAME**
10. **EMPLOYEE ADDRESS**
11. **EMPLOYEE TELEPHONE NUMBER (WITH AREA CODE)**
12. **EMPLOYEE'S SIGNATURE**
13. **DATE**
Appendix A-2. Employee Reports of Unsafe and Unhealthful Working Conditions Log

<table>
<thead>
<tr>
<th>Ref No.</th>
<th>Date Received</th>
<th>Location(s)</th>
<th>Condition Description</th>
<th>Date Inspected / Investigated</th>
<th>Date of Response</th>
<th>Verified Hazard? (Y/N)</th>
<th>Hazard / Deficiency Report No.</th>
<th>RAC</th>
<th>Date Abated</th>
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Appendix B. Notification, Recordkeeping, and Reporting (NR&R) of Injuries and Illnesses (I&I)

1. Definitions. See Appendix J.

2. Requirements overview.
   a. Notification. This is the internal GSA process where an employee (or their designated representative) notifies (reports) the injury or illness to their supervisor. Recordkeeping: All recordable injuries and illnesses must be documented by GSA. OSHA Form 301 "Injury and Illness Incident Report" is used to record these injuries and illnesses.
   b. Reporting. Fatalities and serious injuries and illnesses must be reported to OSHA within a specific time period after the occurrence or after the supervisor learns of the occurrence as detailed in paragraph 6 of this appendix.
   c. Annual posting. GSA must post a summary of injuries and illnesses (OSHA Form 301A) annually. 29 CFR 1904 requires the summary to be posted in each establishment in a conspicuous place or places where notices to employees are customarily posted. GSA considers posting on the agency Insite page to meet this requirement.
   d. BLS annual reporting. GSA is required to report OSHA recordable injuries and illnesses to BLS annually.

3. GSA NR&R System. All GSA injury reporting and recording is accomplished using OSHA Forms 301, 300, and 300A. GSA employees, supervisors and OSH professionals access these forms through the DOL eCOMP system at https://www.ecomp.dol.gov.

4. Notification and recording (Internal to GSA).
   a. Regardless of the severity of the injury or illness, the first concern is to determine if the employee needs immediate medical care. If immediate care is required, assist in making arrangements for the employee to go to the nearest health care facility or to their private health care provider. If the employee desires to drive, make sure he or she can safely drive, otherwise ensure that transportation is available, or call an ambulance. The GSA Office of Human Resources Management (OHRM) Workers’ Compensation Program Office provides policy and guidance for arranging and authorizing transportation and medical care in accordance with 9810.1 HCO P, Injury Compensation (Appendix K, Reference (i)). If the situation is not an emergency, the supervisor should take time to discuss the injury or illness with the employee. Supervisors should maintain updated emergency contact lists for their employees and ensure employees keep information updated in the GSA Credential and Identity Management System (GCIMS).
b. Employees who incur a work-related injury or illness must notify their supervisors as soon as possible after the injury or illness or of their realizing that an injury or illness has occurred. If the employee is unable to make this notification due to the injury, illness, or absence from work, a designated employee representative may make such notification. Notification may be made orally, in writing, electronically, or by completing the OSHA Form 301 in eCOMP. Criteria for considering an injury or illness work-related is defined in detail in 20 CFR 1904 (Appendix K, Reference (d)).

c. All workplace injuries and illnesses shall be entered on an OSHA Form 301 in eCOMP within seven (7) working days of the notification. The OSHA Form 301 may be completed by the employee, either with the assistance of or through his or her designated representative, by the employee's supervisor, or a combination thereof. Regardless of who completes the form it is ultimately the supervisor's responsibility to ensure that the form is completed.

d. A Form 301 shall also be completed in eCOMP for “near misses,” specifically a situation in which a job-related injury or illness is narrowly avoided, and other events which do not meet the definition of an OSHA recordable injury or illness, but which may be useful for proactive analysis purposes. This information will be coded in eCOMP as non-recordable events.

e. The supervisor shall inform the employee that the OSHA 301 form is not a workers' compensation claim and that the employee has the right to file a workers' compensation claim if so desired.

Note: 29 CFR 1960.66 states: The recording or reporting of a work-related injury, illness or fatality does not constitute an admission that the Federal agency, or other individual was at fault or otherwise responsible for purposes of liability. Such recording or reporting does not constitute an admission of the existence of an employer/employee relationship between the individual recording the injury and the injured individual. The recording or reporting of any such injury, illness or fatality does not mean that an OSHA rule has been violated or that the individual in question is eligible for workers’ compensation or any other benefits. The requirements of this part do not diminish or modify in any way a Federal agency’s responsibilities to report or record injuries and illnesses as required by the Office of Workers' Compensation Programs under the Federal Employees' Compensation Act (FECA), 5 U.S.C. 8101 et seq.

5. Review.

a. The supervisor shall ensure that the OSHA 301 form is filled out completely, accurately, and that the form questions are specifically addressed. The supervisor shall confer with the employee, witnesses, and consider other documentation (such as police reports) in such review. A site inspection may also be warranted.

b. The circumstances surrounding a reported injury or disease may arouse a supervisor's suspicion that the condition is not work-related. Under the Federal workers' compensation rules supervisors cannot impede an employee’s right to file a claim and must assist in processing such requests in a timely manner. However, the safety and health OSHA Form 301 will act as a precedent regarding the facts of the claimed injury
or illness if such becomes a workers’ compensation claim. This is another reason to ensure the OSHA 301 form is accurate and complete. The supervisor’s accuracy and completeness is key in completing the Form 301 because once DOL approves a case or pays benefits, it requires additional case documentation and justification to subsequently affect changes to the DOL decision. Refer to 9810.1 HCO P Injury Compensation (Appendix K, Reference (i) or contact the GSA OHRM Office of Workers’ Compensation.

c. Supervisors shall investigate injuries and illnesses in accordance with Appendix C. The supervisor shall then process the OSHA 301 form in eCOMP.

d. The applicable regional OSHA Recordkeeper (ORK) shall then review the Form 301 for completeness, and

(1) Assign an establishment code to the form. The establishment code where the injury or illness occurred shall be used. GSA has codes available for locations that are not GSA establishments (e.g., lease locations, travel, telework, etc.),

(2) Determination of whether the event is an OSHA recordable or a non-recordable injury or illness, and

(3) Process Form 301 in eCOMP, which will complete the recordkeeping requirement.

e. All OSHA Form 301s for the calendar year must be processed by January 15 of the following year. This is required to enable posting of the OSHA Form 300A by February 1. If an injury or illness continues to accrue lost time after January 15 the ORK can modify the Form 301 at a later date.

6. Fatalities and serious injuries and illnesses.

a. In accordance with 29 CFR 1904, GSA must report the following to OSHA:

(1) The death of any employee as a result of a work-related incident must be reported within eight (8) hours, and

(2) The in-patient hospitalization of one or more employees or an employee's amputation or loss of an eye, as a result of a work-related incident must be reported within twenty-four (24) hours.

b. HSSOs shall determine who in their organizations are designated to report injuries and illnesses to OSHA.
c. HSSOs, or supervisor designees, must also report the above to the Agency OSH Manager and DASHO by the close of the next business day following the fatality or serious injury or illness.

7. Posting and Data Reporting.

a. The Agency OSH Manager shall post the OSHA Form 300A "Summary of Work-Related Injuries and Illnesses" annually from 1 February to 30 April.

b. The Agency OSH Manager shall provide GSA’s injury and illness information to BLS annually.
Appendix C. Accident, Exposure and Incident Investigation

1. **Purpose.** The purpose of an accident, exposure, and incident investigation is to determine the root cause or causes of the event and enable the implementation of changes to prevent future similar occurrences.

2. **Scope.**

   a. Accident, exposure, and incident investigations shall be conducted for all GSA employee work environment injuries and occupational illnesses, regardless of occurrence location.

   b. Investigations of injuries and illnesses incurred by GSA contractors, visitors, or the public and damage to GSA and/or tenant property are the responsibility of the SSO that had control or primary control of the work process or location of the injury or illness. The OSH program may assist with the above investigations as requested by the applicable SSO.

   c. In general, the OSH program should participate in the investigation of "non-OSH" events where such events could have resulted in, or contributed to, a GSA employee occupational injury or illness.

3. **Level of effort.** The level of effort of an investigation shall be commensurate with the severity of the injury, illness or in the case of property damage and near misses, the potential to cause harm.

   a. **General.**

      (1) A fully and accurately completed OSHA Form 301, reviewed by the affected employee's supervisor will generally suffice as an investigation for most accidents (injuries) and exposures (illnesses) provided that Question #17 includes a determination of root cause(s). (Question #17 asks "What object or substance directly harmed the employee?")

      (2) Incidents which do not result in an injury or illness should be investigated under the risk assessment process (JSA/JHA) contained in Appendix E.

      (3) Site investigations are not limited to GSA-owned and operated properties and shall be conducted as necessary at any injury or illness location. Site visits or inspections of employee home work environments are excluded from this requirement. (Refer to Appendix D Paragraph 3.)

   b. **Serious Injuries and Illnesses.**

      (1) Any injury or illness that is required to be reported to OSHA (refer to Appendix B) shall be investigated in accordance with 29 CFR 1960.29.
(2) A formal investigation team shall be assigned by the Agency OSH Manager. The final investigation report shall be submitted to the GSA DASHO via the Agency OSH Manager.
Appendix D. GSA OSH Work Environment Assessments/Inspections

1. Background. 29 CFR 1960 requires inspections of all GSA workplaces be conducted annually as a minimum. This requirement is not only a physical examination of the "brick and mortar" aspects of those workplaces (i.e., the building, materials, and equipment), but also a requirement that the work procedures and conditions be evaluated along with other important information such as injury and illness records. (29 CFR 1960.26(a)) In addition, 29 CFR 1960.25(a) requires that hazards are evaluated in the working environment.

2. Assessments.
   a. The physical inspection aspects of a workplace are only a part of an assessment of a work environment. The assessment includes consideration of the operations and work activities GSA employees perform, how they perform work (work practices); as well as how the space, materials, and equipment along with work operations, processes, activities, and behaviors integrate to form a work environment that impacts employee safety and health.

   b. Assessments are best served by following a process typically known as a JSA or JHA which shall be completed for each unique job function at each location where performed by GSA employees. JSAs/JHAs are further explained in Appendix E.

   c. Because the tasks performed by employees as well as the work environment can change over time, the JSA/JHA that represents GSA employees' jobs must be reviewed and updated at each annual OSH inspection to ensure any new hazards introduced by such changes are addressed by a professional assessment as part of the OSH inspection process. Supervisors should recognize any significant changes that occur in the interim between OSH inspections and should either perform an informal interim JSA/JHA, or request assistance as needed.

3. Exceptions. OSHA will not conduct inspections of employees' home offices, will not hold employers liable for employees' home offices, and does not expect employers to inspect the home offices of their employees. GSA does not inspect employees' home work environments. However, as stated in paragraph 1(e)(6) employees are responsible to ensure home telework locations are maintained in a safe and healthy condition.

4. Inspection preparation. In order to facilitate an effective evaluation, prior to the on-site evaluation portion of the OSH inspection/survey, the inspector shall be provided any available relevant information which pertains to the occupational safety and health of the workplace to be inspected. This includes safety and health hazard reports, injury and illness records, previous inspection reports, reports of unsafe and unhealthful working conditions, existing JSA/JHAs, and any other information will assist the inspector to determine in advance the actual work procedures and conditions to be inspected, in order prepare most effectively for the inspection.
The evaluation performed for each inspection/survey shall result in a list of jobs performed by employees, and for each job listed shall include an assessment of:

a. The relevant, significant tasks that comprise the job.

b. The potential hazards faced by employees in performing each of those tasks, including hazardous conditions, practices, and behaviors.

c. A list of any preventive measures in place to counter or minimize the hazards.

d. An assessment of the severity and likelihood of an injury or illness resulting from any hazards noted.

e. Recommendations for additional corrective actions to reduce/eliminate risk.

5. Inspection requirements. All inspections shall be performed by competent, qualified inspectors who meet the criteria in 29 CFR 1960.25. Employee representatives shall be invited by the inspector to participate in the walk-around portion of the inspection. The inspector shall also make efforts to consult with a reasonable number of GSA employees and supervisors during the walk-around to gather information needed to appropriately characterize work activities and procedures. The following are the requirements for OSH inspections/surveys to meet regulatory requirements as specified in this GSA OSH Program:

a. All GSA employees' jobs shall be subjected to an OSH inspection/survey at least annually. Any jobs or work environments deemed to have an increased risk of accident, injury, or illness due to the nature of the work performed may have more frequent inspections/surveys as determined appropriate by the Agency OSH Manager.

b. Findings resulting from any inspection shall result in completion of a “Hazard/Deficiency Report” (Appendix F-1) and shall be referred to the appropriate supervisor and SSO management for corrective action and appropriate posting. If the hazard is partly or wholly created by a GSA facility the Hazard/Deficiency Report shall also be forwarded to the official in charge of the establishment.

c. Corrections that cannot be completed in 30 days shall result in the generation of an abatement plan per requirements of Appendix F.

d. The program may include follow up reviews by competent safety or occupational health professionals, or as appropriate, through the regional OSH committee, after corrective actions are in place to ensure the completion and effectiveness of actions taken to address findings.

e. When situations arise involving multiple agencies' responsibilities for conditions affecting employee safety and health, GSA will encourage coordination of inspection functions.
6. **Summary.** Inspections of GSA employee work environments provide not just an opportunity for competent safety and health staff to look for non-compliance and hazardous conditions but also afford an opportunity for safety and health professionals to interact with those who supervise as well as perform the job functions and labor representatives, developing relationships that aid communication and presenting the ability to provide additional information related to safety and health issues outside the context of formal training.
Appendix E. Job Safety Analysis / Job Hazard Analysis

1. **Background.** A Job Safety Analysis/Job Hazard Analysis (JSA/JHA) is a risk assessment that in addition to addressing compliance, also helps integrate accepted safety and health principles and practices into a particular task or job operation. The JSA/JHA is a technique that focuses on job tasks as a way to identify hazards before they occur and result in an injury or illness. It focuses on the relationships among the tasks, the tools, the work environment, and how the worker is considered, including capabilities, behaviors, methods and processes. If the JSA/JHA identifies uncontrolled hazards, steps to eliminate or reduce them can be implemented. It forms the basis for changes to the work environment to mitigate any hazards found and the establishment of procedures that can improve safety and health exposures inherent in jobs. In the JSA/JHA, each basic step of a job subjected to the analysis is broken into smaller tasks/steps which are then reviewed to identify potential hazards and to incorporate recommendations for means to safely perform job requirements.

2. **JSA/JHA Application.**

   a. **Compliance.** As a minimum the JSA/JHA must ensure compliance with the OSHA regulations. The JSA/JHA can be used to identify compliance options, generally with varying degrees of risk and cost. (See examples in paragraph 7.)

   b. **Non-Codified Hazards.** The JSA/JHA can be used to identify risks for which no OSHA standard exists, particularly in documenting General Duty Clause hazards.

   c. **Risk Reduction.** When work environments are in compliance with OSHA regulations the JSA/JHA can be used to further reduce risks.

3. **Inputs to the JSA/JHA.** The following documents can provide information for evaluating real or potential risks and crafting a JSA/JHA or other risk assessment:

   - Existing JSA/JHAs
   - Employee job descriptions
   - Job Standard Operating Procedures (SOPs)
   - Inspections, evaluations, surveys, and audits including:
     - OSH workplace inspections
     - PBS facility environmental, health, safety and fire assessments
     - Other PBS facility evaluations
     - Security evaluations and assessments
     - Inspections and audits by external entities
   - Employee Reports of Unsafe/Unhealthy Working Conditions.
   - Workplace injury and illness data, including near misses.

4. **The Risk Assessment Matrix.** Potential hazards identified in the JSA/JHA must be assessed and prioritized. The risk assessment matrix approach helps the assessor rate the degree of risk by considering the consequence of an event and the likelihood
(probability) that the event will occur. A typical matrix looks like the figure below. Appendix G provides detail on the GSA OSH Risk Assessment Matrix and its application.

![Typical Risk Assessment Matrix](image)

5. **Outputs of the risk assessment.** The risk assessment is used for the following:

- To set Risk Assessment Codes (RACs) on Hazard Reports (Appendix F-1),
- To set risk reduction priorities,
- To evaluate Employee Reports of Unsafe/Unhealthy Working Conditions (Appendix A-1),
- To evaluate the risk of injury and illness re-occurrences and the risk implications of near misses (Appendix C and Appendix E),
- To develop Safety Standard Operating Procedures (SOPs) which will be available to employees at work locations (See Appendix J - Definitions),
- To determine training audiences, content, priorities, and frequencies (Appendix H),
- To identify and evaluate risks not codified or identified in standards, guides, or checklists, and
- To assist management in prioritizing resources to address the identified hazards.

6. **Risk assessment in OSHA.** While OSHA is primarily a compliance-centric organization, their processes do incorporate a risk-based approach in several key agency functions. Specifically:

- OSHA standards are written for higher risk activities, hazards, and exposures,
- OSHA inspection priority is risk-based. Priorities are:
  1. Imminent danger,
  2. Catastrophes and fatal accidents,
  3. Employee complaints and referrals,
  4. Programmed high-hazard inspections, and
  5. Follow-up inspections
- OSHA categorizes citations by severity and likelihood (risk):
  "Serious" - high probability of death or serious harm
  "Other Than Serious" - normally would not cause death or serious harm
"De minimis" - administrative violation

- The OSHA General Duty Clause applies to "recognized hazards that are causing or likely to cause death or serious physical harm". The terms "causing or likely to cause" mean a high likelihood and the terms "death or serious physical harm" mean a high severity. Risk is a function of probability and severity.

7. **Examples of risk-based compliance.**

   a. **Example #1: Fall Protection.** Employees such as GSA facility managers that access building roofs need to be protected from falls. This protection can be provided in several ways to comply with the OSHA regulations. For instance, employees can be provided personal fall protection equipment such as a travel limiting system, appropriate tie-off point(s), training, and inspection and maintenance of the equipment. Alternatively, GSA can install a permanent OSHA-compliant rail system on the perimeter of the roof. Both solutions will comply with the fall protection requirements. While the latter solution is more expensive, it will result in a lower risk primarily due to the fact that it is a passive system and is of simple construction. The risk assessment will need to evaluate factors such as the tasks, frequency, number of workers exposed, and likelihood of worker PPE compliance in determining the risk level of each solution. The risk level can then be used to perform a cost-benefit (i.e., risk reduction) evaluation to select the optimal solution.

   b. **Example #2: Shock Hazard.** GSA employees who inspect and evaluate building landscape conditions often do such under varying weather conditions including wet and rainy weather. Landscapes are typically serviced by electrical systems to power lighting, operate fountain pumps, and regulate irrigation valves. As appropriate, employees may be protected by equipping electrical distribution to the landscape with Ground Fault Circuit Interrupters (GFCIs), training employees on specific electrical hazards, and providing PPE (non-conductive boots and gloves). Or, GSA could design the above-mentioned uses with low voltage equipment (i.e., <50 volts per the National Electric Code), eliminating the hazard and the need for employee protection under appropriate circumstances.
Appendix F. Hazard / Deficiency Documentation and Control

1. **Hazard / Deficiency Identification.** Hazards and deficiencies may be identified through a number of means including:
   
   a. JSA/JHAs,
   
   b. Work environment inspections,
   
   c. Employee Reports of Unsafe/Unhealthy Working Conditions,
   
   d. Workplace injuries and illnesses, including near misses, and
   
   e. OSH Committee concerns.

   Refer to Appendix E for further detail regarding sources of hazard and deficiency information.

2. **Hazard/Deficiency Report.** All hazards and deficiencies that cannot be corrected immediately must be documented on the form in Appendix F-1 Parts I and II. Interim controls must be implemented to ensure employee exposure is controlled during the correction process. Part III must be included for hazards that cannot be corrected within 30 calendar days. Regions / SSOs may use any method to complete and track the GSA Form (paper or electronic) provided that all fields specified herein are included.

3. **Hazard / deficiency report definitions and instructions.**

   **PART I – IDENTIFICATION**

   - **BUILDING NUMBER** Applies to a hazard /deficiency when located in a GSA owned or leased facility. Format - XX9999. If hazard is not in a GSA facility, enter "NONGSA".
   - **ADDRESS:** Use for a hazard or deficiency located in other than a GSA owned or leased facility.
   - **LOCATION(S) OF FINDING:** Different findings (different citations) must be documented on separate Hazard/Deficiency Reports, however if the same finding occurs in multiple locations those locations may be grouped on one Hazard / Deficiency Report. Examples for specific locations are "2nd floor Room 201, east wing exit stair, travel (at airport), telework (home)", etc. An example for a grouped location might be "multiple electrical closets throughout the 5th floor"
   - **NUMBER OF LOCATIONS:** Used when grouping hazards. Enter the approximate number of locations grouped. For a single location findings enter "1".
   - **REPORT NUMBER:** Optional, for use by the SSO or region.
   - **FINDING NUMBER:** Optional, for use by the SSO or region.
   - **DATE IDENTIFIED:** Date the hazard or deficiency was identified. Format - YYYY/MM/DD
• IDENTIFICATION SOURCE: Method by which the hazard was identified.

• HAZARD/DEFICIENCY TYPE: Types of hazards or deficiencies found. Check all that apply.
  Work Process: A hazard or deficiency caused by the manner in which work is performed.
  Facility: A hazard or deficiency associated with the facility where work is being performed.
  Administrative: Issues of an administrative nature that endanger the employee, such as lack of training, lack of exposure sampling, etc.
  Other: A hazard or deficiency that does not fall into one of the categories above.

• GSA SAFETY and HEALTH CONTACT: The GSA Safety and Health Contact is the person assigned by PBS that ensures annual OSH assessments/inspections of GSA work environments are completed as required in Section 1.c.(3)(e)1 of this Order. This person may have performed the assessments, or reviewed and approved the assessments conducted by others.

• INSPECTOR/INVESTIGATOR: The safety contact that performed the assessment and completed the report. This may be the GSA Safety and Health Contact or a contract consultant.

• HAZARD/DEFICIENCY DESCRIPTION: A description of the hazard or deficiency including materials and equipment involved and the approximate number of employees exposed or at risk.

• INITIAL RISK: Enter the consequence and likelihood values as per Appendix G. The RAC is a derived value and can be calculated by the abatement plan.

• OSHA STANDARD VIOLATED: All Hazard or Deficiency Reports must cite an OSHA standard. When no OSHA standard exists the OSHA "General Duty Clause" may be considered. If the General Duty Clause is cited enter "PL 91-596 Sec 5(a)(1)".

• REFERENCE: If the OSHA General Duty Clause is cited, a supporting consensus standard, building code, fire code or other appropriate supporting reference must be included here.

• ATTACHED DOCUMENTATION: Indicate if any photos or other documents are attached to the Hazard / Deficiency Report. Documents can be attached in the abatement plan.

PART II - INTERIM CONTROLS AND ABATEMENT OPTIONS

• INTERIM CONTROLS AND ABATEMENT OPTIONS:
  - The inspector / investigator shall recommend a solution or solutions for permanently abating the hazard.
  - When a hazard cannot be corrected immediately then interim controls must be put in place until such correction(s) can be made. The inspector / investigator shall recommend interim controls and the supervisor shall be responsible for ensuring those controls are put in place.
- All hazards and deficiencies that cannot be corrected within 30 calendar days from the issuance of this report must have a documented plan for abatement. The supervisor in charge of the operation that exposes or potentially exposes their employee(s) to the hazard is responsible for ensuring abatement action is coordinated within the agency. The supervisor shall coordinate with other GSA entities as necessary, such as PBS Design and Construction, Facility Management, Service Centers, etc., to develop a project that abates the hazard in the most expedient and cost effective manner.

- **SUPERVISOR IN CHARGE OF THE OPERATION:** The supervisor of the employees that are primarily exposed or potentially exposed to the hazard.
- **SCHEDULED ABATEMENT DATE:** Scheduled abatement date shall be assigned by the GSA Safety Contact based on risk, cost and project complexity. The GSA Safety Contact shall coordinate with the area supervisor and project manager (if necessary) in determining a reasonable abatement date.

**PART III - FINAL ABATEMENT**

- **FINAL ABATEMENT:** The permanent abatement solution.
- **COMPLETION DATE:** Date permanent abatement is completed.
- **COST:** Total cost for the abatement.
- **VERIFICATION DATE:** Date the verification was conducted.
- **VERIFICATION METHOD:** Documented assurance that the hazard or deficiency has been abated. This may be verified through a follow-up inspection, photographs of the completed abatement, or a certification by the HSSO.
- **VERIFIED BY:** The person that verified the final abatement.
- **FINAL (RESIDUAL) RISK:** A hazard or deficiency that has been abated to come into compliance with OSHA standards does not guarantee that risk has been eliminated. Typically a residual (but acceptable) risk exists after final abatement. Enter the consequence and likelihood values for the abated condition. Refer to Appendix G for specifics on assigning values. In the event the hazard or deficiency has been completely eliminated enter "0" for the consequence and likelihood.
Appendix F-1. Hazard / Deficiency Report

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HAZARD / DEFICIENCY DESCRIPTION

| INITIAL RISK CONSEQUENCE: | OSHA STANDARD VIOLATED: |
| LIKELIHOOD: | REFERENCE: |

ATTACHED DOCUMENTS
| □ PHOTOS | □ OTHER |

| PART II - INTERIM CONTROLS AND ABATEMENT OPTIONS |
| SUPERVISOR IN CHARGE OF THE OPERATION |
| NAME: |
| ORGANIZATION: |
| TELEPHONE: |
| EMAIL: |
| SCHEDULED ABATEMENT DATE: |

| PART III - FINAL ABATEMENT |
| COMPLETION DATE: |
| COST: |
| VERIFICATION DATE: |
| VERIFICATION METHOD: |
| VERIFIED BY |
| NAME: |
| ORGANIZATION: |
| TELEPHONE: |
| EMAIL: |
| FINAL (RESIDUAL) RISK CONSEQUENCE: |
| LIKELIHOOD: |

GSA STANDARD FORM XXXX REV (0) DATE
Appendix G. Risk Assessment Matrix

1. **Scope.** This appendix provides basic Risk Assessment Matrix requirements. Refer to informational Appendix G-1 for additional background, detail and explanatory.

2. **Background.** A Risk Assessment Matrix combines the consequence of an event and the likelihood (probability) that the event will occur into a "risk level".

3. **Application.** The Risk Assessment Matrix is commonly used to assign risk levels to Hazard Reports. However, the process has wide application and can also be used to assess risks related to JSAs/JHAs, employee reports of unsafe/unhealthy working conditions, injury and illness causes and other safety and health evaluations.

4. **Consequence Scale.** The table below defines the consequence levels and relative impacts.

<table>
<thead>
<tr>
<th>Consequence Rating</th>
<th>Injury</th>
<th>Illness</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Death or permanent disability</td>
<td>Irreversible health effect</td>
<td>Death, paralysis, amputation, cancer, asbestosis</td>
</tr>
<tr>
<td>II</td>
<td>Severe injury</td>
<td>Potential long-term health effect</td>
<td>Head trauma, coma, reduced lung capacity, occupational asthma</td>
</tr>
<tr>
<td>III</td>
<td>Moderate injury, lost time</td>
<td>Reversible health effect that may require hospitalization.</td>
<td>Broken bones, metal fume fever, carbon monoxide poisoning</td>
</tr>
<tr>
<td>IV</td>
<td>Minor injury, no lost time</td>
<td>Irritation, reaction or discomfort</td>
<td>Sprains, stitches, dizziness and shortness of breath caused by vapors, short-term reaction</td>
</tr>
<tr>
<td>V</td>
<td>First aid</td>
<td>Episodic or short-term irritation, reaction or discomfort</td>
<td>Cuts, bruises, minor irritation</td>
</tr>
</tbody>
</table>

5. **Likelihood Scale.** The table below defines the likelihood levels:

<table>
<thead>
<tr>
<th>Likelihood Rating</th>
<th>Likelihood Over Time</th>
<th>Approximate Probability</th>
</tr>
</thead>
<tbody>
<tr>
<td>A - Frequent</td>
<td>Likely to occur often in the life of an item.</td>
<td>~ 1 in 10</td>
</tr>
<tr>
<td>B - Probable</td>
<td>Will occur several times in the life of an item.</td>
<td>~ 1 in 100</td>
</tr>
<tr>
<td>C - Occasional</td>
<td>Likely to occur sometime in the life of an item.</td>
<td>~ 1 in 1000</td>
</tr>
<tr>
<td>D - Remote</td>
<td>Unlikely, but possible to occur in the life of an item.</td>
<td>~ 1 in 10,000</td>
</tr>
<tr>
<td>E - Improbable</td>
<td>So unlikely, it can be assumed occurrence may not be experienced in the life of an item.</td>
<td>~ 1 in 100,000</td>
</tr>
</tbody>
</table>
6. **RL and RAC Scales.** Each consequence and likelihood corresponds to a "Risk Level" (RL) and a corresponding "Risk Assessment Code" (RAC) as defined below:

<table>
<thead>
<tr>
<th>RAC (Priority)</th>
<th>Risk Level</th>
<th>Description</th>
<th>Comparable OSHA Risk Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>5</td>
<td>High/Imminent</td>
<td>Black</td>
</tr>
<tr>
<td>2</td>
<td>4</td>
<td>High</td>
<td>Red</td>
</tr>
<tr>
<td>3</td>
<td>3</td>
<td>Serious</td>
<td>Orange</td>
</tr>
<tr>
<td>4</td>
<td>2</td>
<td>Medium</td>
<td>Yellow</td>
</tr>
<tr>
<td>5</td>
<td>1</td>
<td>Low</td>
<td>Grey</td>
</tr>
</tbody>
</table>

7. **Determination of RL and RAC Value.** The RL and RAC values are determined from the following Risk Assessment Matrix:

<table>
<thead>
<tr>
<th>LIKELIHOOD</th>
<th>CONSEQUENCE LEVEL</th>
<th>Frequent</th>
<th>Probable</th>
<th>Occasional</th>
<th>Remote</th>
<th>Improbable</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Catastrophic</td>
<td>Severe</td>
<td>Significant</td>
<td>Moderate</td>
<td>Minor</td>
</tr>
<tr>
<td>Frequent</td>
<td>Imminent Danger</td>
<td>HIGH RAC 2 (RL 4)</td>
<td></td>
<td>SERIOUS RAC 3 (RL 3)</td>
<td></td>
<td>MEDIUM RAC 4 (RL 2)</td>
</tr>
<tr>
<td>Probable</td>
<td>HIGH RAC 2 (RL 4)</td>
<td></td>
<td>SERIOUS RAC 3 (RL 3)</td>
<td></td>
<td>MEDIUM RAC 4 (RL 2)</td>
<td></td>
</tr>
<tr>
<td>Occasional</td>
<td>HIGH RAC 2 (RL 4)</td>
<td></td>
<td>SERIOUS RAC 3 (RL 3)</td>
<td>MEDIUM RAC 4 (RL 2)</td>
<td>LOW RAC 5 (RL 1)</td>
<td></td>
</tr>
<tr>
<td>Remote</td>
<td>SERIOUS RAC 3 (RL 3)</td>
<td>MEDIUM RAC 4 (RL 2)</td>
<td>MEDIUM RAC 4 (RL 2)</td>
<td>LOW RAC 5 (RL 1)</td>
<td>LOW RAC 5 (RL 1)</td>
<td></td>
</tr>
<tr>
<td>Improbable</td>
<td>SERIOUS RAC 3 (RL 3)</td>
<td>MEDIUM RAC 4 (RL 2)</td>
<td>LOW RAC 5 (RL 1)</td>
<td>LOW RAC 5 (RL 1)</td>
<td>LOW RAC 5 (RL 1)</td>
<td></td>
</tr>
</tbody>
</table>
Appendix G-1 (Informational). Risk Assessment Matrix Detail

1. Scope. This informational (non-mandatory) appendix provides additional background, detail and explanatory material to Appendix G. Most of the material contained in Appendix G is repeated here for clarity and flow.

2. Background. A Risk Assessment Matrix combines the consequence of an event and the likelihood (probability) that the event will occur into a "risk level". The fundamental equation is as follows:

\[
\text{Risk} \left( \frac{\text{Expected Loss}}{\text{Unit Time or Activity}} \right) = \text{Consequence} \left( \frac{\text{Expected Loss}}{\text{Loss Event}} \right) \times \text{Likelihood} \left( \frac{\text{Loss Event}}{\text{Unit Time or Activity}} \right)
\]

Under this system high consequence, high probability events define the highest risk levels while low consequence, low probability events define the other extreme. Any combination of high to low consequence and probability may exist between these two boundaries.

3. Detail vs. simplicity.

Although risk management professionals provide the input to the matrix, managers must be able to understand and use the output. It is acceptable to have appropriately detailed input, however the output needs to be simple (e.g., no more than four or five risk bands).

4. Application. The Risk Assessment Matrix is commonly used to assign risk levels to Hazard Reports. However, the process has wide application and can also be used to assess risks related to JSAs/JHAs, employee reports of unsafe/unhealthy working conditions, injury and illness causes and other safety and health evaluations.

5. Consequence.

   a. Terminology. The term "severity" is often used to define the consequence scale. GSA uses the term "consequence" because "severe" is used as a level on that scale.

   b. Number of levels. GSA’s risk assessment matrix is based on industry best practices and includes five (5) consequence levels (minor, moderate, significant, severe, and catastrophic), and five (5) likelihood levels (unlikely, remote, possible, probable, and likely).

Note: Early matrices utilized a four-level consequence categorization which often included the lower "negligible" boundary. This usually left three levels of consequence to work with and resulted in only two meaningful categorizations of risk, "major" and "minor". Very high risks are not common and low risks often times are deemed "acceptable risks". Most of the profession has moved to a five-level categorization, with the "negligible" level often excluded.
c. **Relative consequence.** GSA uses "orders of magnitude" (factors of 10) to approximately define relative consequence levels (e.g., "catastrophic" is an x10,000 consequence above "minor").

Note: Previous systems assigned a 1-2-3-4 level to the consequence levels. This often implied a simple multiplicative, or at best, a geometric relationship between the lowest and highest levels. As an example, for injuries the lowest level was often "first aid" and the highest "death". This would result in an x4 or x16 consequence level between these two extremes. In this updated model GSA uses "orders of magnitude" (factors of 10) to approximately define the relative consequence levels, i.e., "death or permanent disability" is a x10,000 consequence above first aid. While this is still under-represented for the death example it fits most other types of impacts fairly well and is a significant improvement over the early systems.

d. **Consequence scale.** The table below summarizes the consequence levels and relative impacts. Consequence levels are qualitatively labeled as catastrophic, severe, significant, moderate, and minor.

<table>
<thead>
<tr>
<th>Consequence Rating</th>
<th>Injury</th>
<th>Illness</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Death or permanent disability</td>
<td>Irreversible health effect</td>
<td>Death, paralysis, amputation, cancer, asbestosis</td>
</tr>
<tr>
<td>II</td>
<td>Severe injury</td>
<td>Potential long-term health effect</td>
<td>Head trauma, coma, reduced lung capacity, occupational asthma</td>
</tr>
<tr>
<td>III</td>
<td>Moderate injury, lost time</td>
<td>Reversible health effect that may require hospitalization.</td>
<td>Broken bones, metal fume fever, carbon monoxide poisoning</td>
</tr>
<tr>
<td>IV</td>
<td>Minor injury, no lost time</td>
<td>Irritation, reaction or discomfort</td>
<td>Sprains, stitches, dizziness and shortness of breath caused by vapors, short-term reaction</td>
</tr>
<tr>
<td>V</td>
<td>First aid</td>
<td>Episodic or short-term irritation, reaction or discomfort</td>
<td>Cuts, bruises, minor irritation</td>
</tr>
</tbody>
</table>

e. **Other considerations.** The assessor should consider other consequences that may impact the overall risk of the safety and health concern. These factors include, but are not limited to:

- Property - Fire, contamination, or damage to facilities, equipment, furnishings, or personal property.
- Environmental - Contamination of air, water soil, and biota.
- Mission - Degradation or loss of Federal agency mission.
- Financial - Loss of revenue, cost to repair, rebuild, or remediate, workers’ compensation and death benefits, environmental fines and compliance order costs.
- Stakeholder Input - Inspector General (IG) and General Accountability Office (GAO) reports, Congressional inquiry or investigation, OSHA Notices of
Unsafe/Unhealthy Working Conditions, Environmental Notices of Violations (NOVs).


   a. Terminology. The term "probability" is often used in risk assessment, however, the term connotes a mathematical value. Because the probability of an event is subjective and cannot be easily quantified mathematically, GSA prefers to use the more qualitative term of "likelihood". For analytical purposes GSA uses a corresponding approximate probability value.

   b. Likelihood scale. The table below summarizes the likelihood levels which are qualitatively labeled as frequent, probable, occasional, remote, and improbable.

Note: Probability is a bit more straightforward than consequence in that it tends to naturally follow an "order of magnitude" model, at least subjectively. The difference between "frequent" and "probable," "probable" and "occasional," and so on, tend to describe an order of magnitude relationship. A good lower boundary is EPA's 10^{-6} (one in one million) chance of increased risk because that is the level that EPA generally considers the increased risk created by the substance or event to be negligible. The upper boundary is p = 1, i.e., that the event has occurred or is certain to occur. That leaves five levels of significance, which is a scale commonly used.

### Likelihood Scale and Guidance

<table>
<thead>
<tr>
<th>Likelihood Rating</th>
<th>Likelihood Over Time</th>
<th>Approximate Probability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occurs constantly</td>
<td>Upper boundary</td>
<td>1 ( (\text{event/condition has occurred, or is certain to occur}) )</td>
</tr>
<tr>
<td>A - Frequent</td>
<td>Likely to occur often in the life of an item.</td>
<td>~ 1 in 10</td>
</tr>
<tr>
<td>B - Probable</td>
<td>Will occur several times in the life of an item.</td>
<td>~ 1 in 100</td>
</tr>
<tr>
<td>C - Occasional</td>
<td>Likely to occur sometime in the life of an item.</td>
<td>~ 1 in 1000</td>
</tr>
<tr>
<td>D - Remote</td>
<td>Unlikely, but possible to occur in the life of an item.</td>
<td>~ 1 in 10,000</td>
</tr>
<tr>
<td>E - Improbable</td>
<td>So unlikely, it can be assumed occurrence may not be experienced in the life of an item.</td>
<td>~ 1 in 100,000</td>
</tr>
<tr>
<td>Will not occur</td>
<td>Lower boundary</td>
<td>&gt; 1 in 1,000,000 (&quot;safe&quot; level)</td>
</tr>
</tbody>
</table>

Note 1: Likelihood descriptions taken from Appendix F of ANSI/ASSP Z10 (ref. a)

Note 2: Lifetime likelihoods taken from MIL-STD-882 (ref. d). "Item" can mean an item, component, equipment, system, process, facility or other location where the hazard or exposure applies.

Likelihood estimate. Likelihood (as with probability) must be associated with a time interval. This association is often ignored or not understood. The time interval needs to
be established for the "item" life causing the hazard. An example might be "the life of a building or 50 years," "life of the mechanical system or 25 years."

7. RL and RAC Determination.

a. Each consequence and likelihood corresponds to a "Risk Level" (RL) as defined in Appendix F of ANSI Z10 (ref. a). The RL value (1-5) increases as risk increases, similar to the convention used for hurricane categories, earthquake magnitudes, and forest fire danger levels. In communicating risk the RL scale is particularly useful in monitoring risk reduction, e.g., "The workers' risk level was reduced from an average risk level of 4.1 to a level of 2.8."

b. For each RL there is a corresponding "Risk Assessment Code" (RAC). The RAC may not be immediately intuitive as a measure of the level of risk because the RAC value decreases as risk increases. However, the RAC is actually a priority and is used in assigning mitigation and abatement priorities. For example, RAC I exposures must be immediately addressed, followed by RAC IIs, RAC IIIs, and so on.

c. RL and RAC are defined below:

<table>
<thead>
<tr>
<th>RAC (Priority)</th>
<th>Risk Level</th>
<th>Description</th>
<th>Comparable OSHA Risk Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>5</td>
<td>High/Imminent</td>
<td>Black Imminent Danger</td>
</tr>
<tr>
<td>2</td>
<td>4</td>
<td>High</td>
<td>Red Serious, High Gravity</td>
</tr>
<tr>
<td>3</td>
<td>3</td>
<td>Serious</td>
<td>Orange Serious, Moderate Gravity</td>
</tr>
<tr>
<td>4</td>
<td>2</td>
<td>Medium</td>
<td>Yellow Serious, Low Gravity</td>
</tr>
<tr>
<td>5</td>
<td>1</td>
<td>Low</td>
<td>Grey Other than serious</td>
</tr>
</tbody>
</table>

d. The RL and RAC are determined from the following Risk Assessment Matrix:

<table>
<thead>
<tr>
<th>LIKELIHOOD</th>
<th>CONSEQUENCE LEVEL</th>
<th>Frequent</th>
<th>Probable</th>
<th>Occasional</th>
<th>Remote</th>
<th>Improbable</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Catastrophic</td>
<td>Imminent</td>
<td>HIGH</td>
<td>HIGH</td>
<td>SERIOUS</td>
<td>SERIOUS</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Danger</td>
<td>RAC 2</td>
<td>RAC 2</td>
<td>RAC 3</td>
<td>RAC 3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>RAC 1</td>
<td>(RL 5)</td>
<td>(RL 4)</td>
<td>(RL 3)</td>
<td>(RL 3)</td>
</tr>
<tr>
<td></td>
<td>Severe</td>
<td>HIGH</td>
<td>SERIOUS</td>
<td>SERIOUS</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
</tr>
<tr>
<td></td>
<td></td>
<td>RAC 3</td>
<td>RAC 3</td>
<td>RAC 3</td>
<td>RAC 4</td>
<td>RAC 4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(RL 3)</td>
<td>(RL 3)</td>
<td>(RL 3)</td>
<td>(RL 2)</td>
<td>(RL 2)</td>
</tr>
<tr>
<td></td>
<td>Significant</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
<td>MEDIUM</td>
<td>LOW</td>
<td>LOW</td>
</tr>
<tr>
<td></td>
<td></td>
<td>RAC 4</td>
<td>RAC 4</td>
<td>RAC 4</td>
<td>RAC 5</td>
<td>RAC 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(RL 2)</td>
<td>(RL 2)</td>
<td>(RL 2)</td>
<td>(RL 1)</td>
<td>(RL 1)</td>
</tr>
<tr>
<td></td>
<td>Moderate</td>
<td>LOW</td>
<td>LOW</td>
<td>LOW</td>
<td>LOW</td>
<td>LOW</td>
</tr>
<tr>
<td></td>
<td>Minor</td>
<td>LOW</td>
<td>LOW</td>
<td>LOW</td>
<td>LOW</td>
<td>LOW</td>
</tr>
</tbody>
</table>
Note: The matrix is intentionally skewed to weigh hazards with high consequence with an increased RL. Specifically, a hazard with a "catastrophic" consequence and an "occasional" likelihood is considered a RAC II (RL 4) rather than a RAC III (RL 3), and similarly a hazard with a "catastrophic" consequence and an "improbable" likelihood is considered a RAC III (RL 3) rather than a RAC IV (RL 2). This is a practice used by both OSHA and the insurance industry to give more weight to the most severe consequence(s) over the lesser likelihood or probability. For example, the insurance industry often uses "maximum possible loss" in addition to the risk matrix to establish premiums.

e. If a hazard or deficiency has been eliminated the RL will be reduced to zero (0) because either the consequence, likelihood or both will have a value of zero (0). Since RL is a function of both consequence and likelihood if either factor is eliminated then the risk is removed. If the hazard or deficiency is eliminated the RAC becomes meaningless and does not exist, i.e., there is no priority to abate a hazard or deficiency which does not exist.

f. The definition of a General Duty Clause hazard is "causing or likely to cause" ("Frequent" likelihood) "death or serious physical harm" ("Catastrophic" or "Severe" consequence). Therefore a General Duty Clause violation should be rated as a RAC I (RL 5) or RAC II (RL 4).
Appendix H. Occupational Safety and Health Training

1. **Background.** GSA manages a number of programs related to health, safety, and the environment. Often these programs are considered generically and broadly under many names that have been applied over the years such as "safety," “safety and health,” OSH, S&EM, Accident & Fire Prevention, or the Sustainability-related programs. However, while these programs are interrelated there are significant differences and distinctions among these disciplines specifically with regard to:

   a. The nature of the requirements that drive the programs,

   b. The processes they must use to implement individual programs, and

   c. The different knowledge, skills, and experience requirements for various program “experts” needed to manage and implement each program.

   d. It should be noted that programs often have responsibilities under the same sets of statutes and regulations.

2. **Purpose.** The OSH training program serves two primary purposes:

   a. Protect all GSA personnel. GSA must ensure any actual or potential hazards expected in the work environments or performances of any jobs of GSA employees are thoroughly understood by relevant managers, supervisors, and employees/employee representatives. In addition managers, supervisors, and employee representatives must understand the nature, and requirements and limitations for any engineering, administrative or PPE controls in place to reduce the level of hazard for any hazards identified in any GSA employee work environments.

   b. Comply with safety and health laws and regulations. GSA must ensure that all executives, managers, supervisors and employees as well as program technical and administrative staff understand the program requirements, the responsibilities incumbent on the performance of their positions, as well as the administrative procedures they must perform for the program.

3. **Scope.** The scope of the training requirements in this Order pertain specifically to the agency’s GSA OSH program as it is related to GSA’s agency responsibilities as a Federal employer with a direct employer-employee relationship. The GSA employee OSH program has a unique set of requirements established in Federal law, regulation, applicable standards (i.e., the Occupational Safety and Health Act of 1970, as revised (29 U.S.C. 651 et seq), E.O. 12196 and 29 CFR 1960) that require organization-wide training in the agency program in order to manage and implement the program effectively, and also job and task-specific training (i.e., 29 CFR 1910, 29 CFR 1926) to ensure employee safety and ensure regulatory compliance. This specific training shall be the responsibility of the HSSO to develop and implement.
4. **Minimum requirements and content by job category.** Requirements are specified in 29 CFR 1960 Subpart H for common Federal job categories, specifically employees, supervisors and top managers. Basic training for these job categories shall be developed and delivered by OAS. SSOs must provide additional training for employees with increased exposure as outlined in the Occupational Safety and Health Training Program Requirements table at the end of this Appendix. The following is recommended minimum additional training for typical increased exposures:

   a. Employees who manage and/or inspect facilities should complete the OSHA 10 hour General Industry training.

   b. Employees who manage or visit small construction/renovation projects should complete the OSHA 10 hour Construction training.

   c. Employees who manage major construction projects should complete the OSHA 30 hour Construction training.

5. It is recommended that the above training be completed at least every four (4) years.

6. **Training Delivery.** Training material that is generic and applies to a large GSA population, such as "Employee, Supervisor, and Top Management" courses will be delivered electronically by OAS. Generic courses such as "OSH Committee Members and Employee Representatives" may be delivered electronically or in group webinars by OAS. Job-specific training needs to be designed and delivered within each SSO as required. Job-specific training typically requires a classroom and/or on-site delivery method.

7. **Training matrix.** The table shown on the next page captures the training requirements in a modular training matrix that defines the training requirements per personnel type and what each training covers.
## Occupational Safety and Health Training Program Requirements

<table>
<thead>
<tr>
<th>Module</th>
<th>Audience</th>
<th>Administrative (A)</th>
<th>Technical (T)</th>
<th>Mandatory (M)</th>
<th>As Required (AR)</th>
<th>Complies With 29 CFR Part</th>
<th>Key Content</th>
<th>OLU-delivered?</th>
<th>Content Steward</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee OSH Program Responsibilities and General Risk Awareness</td>
<td>All personnel</td>
<td>A</td>
<td>M</td>
<td></td>
<td></td>
<td>1960.59(a)</td>
<td>OSH Act overview, employee rights &amp; responsibilities, reporting hazards, follow safety rules, reporting injuries and illnesses, protection from reprisal, etc.). Differences between various GSA safety programs, i.e., employee OSH, PBS facility safety, health, environmental and fire programs, FAS product safety, etc. Potential hazards common to all, e.g., office safety, ergonomics, telework, travel, motor vehicle safety, etc.</td>
<td>Y</td>
<td>OAS</td>
</tr>
<tr>
<td>Job-specific risk knowledge</td>
<td>Personnel with specific exposures.</td>
<td>T</td>
<td>AR</td>
<td></td>
<td></td>
<td>1960.59(a)</td>
<td>Specific work environment hazard exposures, i.e., hazards in mechanical rooms, on roofs, at construction sites, etc.</td>
<td>N</td>
<td>SSOs</td>
</tr>
<tr>
<td>OSH program responsibilities for supervisors</td>
<td>All supervisors</td>
<td>A</td>
<td>M</td>
<td></td>
<td></td>
<td>1960.55</td>
<td>Supervisor OSH responsibilities: accident investigation, responding to employee reports of US/UH conditions, hazard assessment, self-inspections, ensuring hazard abatement, etc. APPAS elements for first level supervisors. Budgeting for OSH program needs. Employee responsibilities.</td>
<td>Y</td>
<td>OAS</td>
</tr>
<tr>
<td>Key OSH Areas for Top Management</td>
<td>HSSOs</td>
<td>A</td>
<td>M</td>
<td></td>
<td></td>
<td>1960.54</td>
<td>Agency responsibilities mandated by the OSH Act, E.O. and 29 CFR 1960. OSHA ability to inspect GSA, citations, GSA citation history, personal liability, GSA accident statistics, workers compensation costs, etc.</td>
<td>Y</td>
<td>OAS</td>
</tr>
<tr>
<td>OSH Committee Member Training</td>
<td>OSH Committee Members</td>
<td>A</td>
<td>M</td>
<td></td>
<td></td>
<td>1960.58</td>
<td>Purpose of safety committees, conduct of meetings, expectation of members, etc.</td>
<td>Y</td>
<td>OAS</td>
</tr>
<tr>
<td>Employee Representative OSH Training</td>
<td>AFGE and NFFE representatives</td>
<td>A</td>
<td>M</td>
<td></td>
<td></td>
<td>1960.59(b)</td>
<td>Right to represent employees an safety and health, committees, Union contract requirements, access to data, etc.</td>
<td>Y</td>
<td>OAS</td>
</tr>
<tr>
<td>Professional Development</td>
<td>Safety and health professionals and CDSPs</td>
<td>T</td>
<td>AR</td>
<td></td>
<td></td>
<td>1960.56 1960.57 1960.58</td>
<td>Specialized training required for GSA OSH subject matter experts (SMEs) and Collateral Duty Safety Personnel (CDSP)</td>
<td>N</td>
<td>SSOs</td>
</tr>
</tbody>
</table>
Appendix I. Safety and Occupational Health Committees

1. **Background.** GSA maintains committees as required by reference 2.a and reference 2.b of Appendix K. at the national, regional, and where deemed appropriate, at the establishment level. GSA follows the above-mentioned agreements in lieu of the optional procedures outlined in 29 CFR 1960 Subpart F.

2. **Purpose.** The purpose of a safety committee is to bring workers and management together in a non-adversarial, cooperative effort to promote safe and healthy work environments. The committee assists the agency by facilitating bilateral communication and program improvements. Management and the committee share the responsibilities for implementing and monitoring the agency safety program. The resulting collaboration allows employees to use their knowledge of workplace operations to assist in improving policies, conditions, and practices.

3. **Membership.** Committees are intended to represent the entire constituency of GSA employees, therefore representation shall be offered to all SSOs and both GSA labor unions.

   a. National committee membership shall consist of the following representation as a minimum:

   (1) Agency OSH Manager (Chair)

   (2) NFFE (Co-Chair)

   (3) AFGE (Co-Chair)

   (4) Human Resources

      (a) Workers’ Compensation

      (b) Labor Relations (as required)

   (5) PBS

      (a) Facility Safety and Health

      (b) Other PBS (as required)

   (6) FAS

      (a) Fleet

      (b) Other FAS (as required)
b. Regional committee membership shall be determined by the regional OAS safety coordinator.

4. **Committee Scope.**

   a. National committees shall as a minimum:

      (1) Monitor performance of the GSA OSH and make policy recommendations on the operation of the program to the GSA DASHO.

      (2) Monitor and assist in the development and operation of the GSA regional and establishment safety and occupational health committees.

      (3) Monitor and recommend changes in the resources allocated to the entire GSA OSH.

      (4) Report their dissatisfaction to the Secretary of Labor if half of a committee determines there are deficiencies in the GSA OSH or is not satisfied with GSA’s reports of reprisal investigations.

   b. Regional committees and establishment committees (where they exist) shall at a minimum:

      (1) Monitor and assist the safety and health program at establishments under its jurisdiction and make recommendations to the official in charge of the operation of the program;

      (2) Monitor findings and reports of workplace inspections to confirm that appropriate corrective measures are implemented;

      (3) Participate in the inspection of any establishment, when at least half of the committee deems such activity necessary;

      (4) Monitor plans for abating safety and health hazards;

      (5) Review responses to reports concerned with allegations of hazardous conditions, alleged safety and health program deficiencies, and allegations of discrimination due to participation in the OSHA program. If at least half of the members of record on the committee are not substantially satisfied with the response, they may report their dissatisfaction to OSHA, or request an appropriate investigation by OSHA (This does not preclude an employee from filing a separate complaint with OSHA at any time during the process.);

      (6) Review procedures for handling safety and health suggestions and recommendations from employees; and
(7) Review reports of unsafe and unhealthful conditions where the hazard has been disputed.

5. **Conduct of meetings.** Meetings shall be conducted in accordance with reference 2.a and reference 2.b. of Appendix K. In addition:

   a. Committees shall document and forward all safety and occupational health issues and concerns to the appropriate level of GSA management for review, investigation and resolution. GSA OSH Form "Employee Reports of Unsafe/Unhealthy Conditions" (Appendix A-1) may be used to document such issues and concerns.

   b. Issues and concerns that cannot be resolved at the regional level or have national impact should be forwarded to the national committee.

6. **Conflicts.** If any conflicts, additional requirements, or other differences occur between this Appendix and references 2.a and 2.b of Appendix K, those references shall take precedence over this Appendix.
Appendix J. Definitions

1. Abatement – Abatement is the correction of a safety or health hazard or deficiency.


3. Agency Occupational Safety and Health (OSH) Manager – The "Safety and Health Official" as defined in 29 CFR 1960.2(r), specifically the individual who manages the GSA-wide occupational safety and health program at the organizational level below the DASHO.

4. CDSR – Collateral Duty Safety Representative (CDSR) means an employee that is tasked with identifying hazard(s) in the workplace, reporting the present hazard(s), and working with professionals in the abatement process, generally as a collateral duty.

5. Designated Agency Safety and Health Official (DASHO) – The individual who is responsible for the management of the safety and occupational health program within an agency, and is so designated or appointed by the head of the agency under 29 CFR 1960.6 and the provisions of E.O. 12196. (29 CFR 1960.2(f))

6. Emergency Action Plans - Applicable only when required by an OSHA standard as per 29 CFR 1910 Subpart E. The minimum scope applies to GSA employees only. Plans are reactive in nature and apply to a broad range of hazards, including fire.

7. Employee – Any person employed or otherwise suffered, permitted, or required to work by an agency. (29 CFR 1960.2(g))

8. Establishment – A single physical location where business is conducted or where services or operations are performed (29 CFR 1960.2(h)). Each GSA owned and leased facility is considered to be an "establishment". Groups of establishments that perform the same or similar function may be grouped together as a single establishment. Examples would be campuses and border stations.

9. Fatality – Death resulting from an occupational injury or illness/disease.

10. Fire Prevention Plans - Applicable only when required by an OSHA standard as per 29 CFR 1910 Subpart E. The minimum scope is GSA employees only. Plans are preventative in nature and only apply to fire hazards.

11. Imminent Danger – Any conditions or practices in a workplace that could reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through normal procedures. (29 CFR 1960.2(u))
12. Injury or illness – An abnormal condition or disorder. Injuries include cases such as, but not limited to a cut, fracture, sprain, or amputation. Illnesses include both acute and chronic illnesses, such as, but not limited to, a skin disease, respiratory disorder, or poisoning.

13. Inspection – A comprehensive survey of all or part of a workplace in order to detect safety and health hazards. Inspections are normally performed during the regular work hours of the agency, except as special circumstances may require. Inspections do not include routine, day-to-day visits by agency occupational safety and health personnel, or routine workplace surveillance of occupational health conditions (from 29 CFR 1960.2(k)). In this order the term “OSH inspection” is replaced with “OSH inspection/assessment” to include the expanded review beyond compliance to the scope of a JSA/JHA as described in Appendix E.

14. Non-recordable – These consist of injuries, illnesses, or other events (such as first aid, near misses, and events that are not work-related) that do not meet the recording requirement of 29 CFR 1904.

15. Occupant Emergency Plan (OEP) – Procedures developed to protect life and property in a specific Federally-occupied space under stipulated emergency conditions. Applicable to GSA and all Federal tenants as stipulated in 41 CFR Part 102-74.


17. Recordable occupational injury or illness – Any injury or illness that meets the criteria of 29 CFR 1904 as a work-related recordable injury or illness. Any occupational death; every nonfatal occupational illness; and those nonfatal occupational injuries that involve one or more of the following: loss of consciousness, restriction of work or motion, transfer to another job, or medical treatment (other than first aid).

18. Representative of management – A supervisor or management official as defined in the applicable labor-management relations program covering the affected employees.

19. Reprisal – Any act of restraint, interference, coercion, or discrimination against an employee for exercising his or her rights under E.O. 12196 and 29 CFR Part 1960, or for participating in the agency’s safety and occupational health program (29 CFR 1960.2(x)).
20. GSA Safety and Health Contact – The GSA Safety and Health Contact is a person within a particular GSA organization, such as a Service or Staff Office (SSO), that meets the qualification requirements of 29 CFR 1960.25 for Safety and Health Inspector or Safety and Health Specialist. This person either performs safety and health duties directly or oversees, reviews and approves safety and health tasks performed for GSA by other parties such as consultants, vendors, and other agencies.

21. Safety and Occupational Health Inspector – A safety and occupational health specialist or other person authorized to carry out inspections for the purpose of Subpart D of 29 CFR Part 1960, or a person having equipment and competence to recognize safety and/or health hazards in the workplace. (29 CFR 1960.2(q))

22. Safety and Occupational Health Specialist - (See 29 CFR 1960.2(s)). GSA makes no differentiation between a Safety and Occupational Health Specialist and a Safety and Occupational Health Inspector.

23. Safety Standard Operating Procedures (SOPs) - A set of step-by-step instructions that employees must follow for specific work processes. SOPs are typically used for complex routine operations. The purpose of the SOP is to achieve efficiency, quality, and uniformity of performance, while preventing injuries and illnesses. SOPs must be available to employees at the work location.

24. Serious - When used in “serious hazard,” “serious violation,” or “serious condition,” means a hazard, violation, or condition for which there is a substantial probability that death or severe physical harm could result. (From 29 CFR 1660.2(v))

25. Serious physical harm – OSHA defines serious physical harm as amputations (loss of all or part of a bodily appendage); concussion; crushing (internal, even though skin surface may be intact); fractures (simple or compound); burns or scalds, including electrical and chemical burns; cuts, lacerations, or punctures involving significant bleeding and/or requiring suturing; sprains and strains; and musculoskeletal disorders. Illnesses that constitute serious physical harm include cancer; respiratory illnesses (silicosis, asbestosis, byssinosis, etc.); hearing impairment; central nervous system impairment; visual impairment; and poisoning.

26. Work environment – The set of places and activities that constitute factors that affect an employee’s safety on the job. While job responsibilities will often involve the workspace, materials, and equipment, the OSH responsibility involves more than those aspects alone. It includes the operations, behaviors and work activities GSA employees perform, how they perform work (work practices), as well as how the space, materials, and equipment along with work operations, processes, activities, and behaviors integrate to form a work environment that impacts employee safety and health.

27. Workplace – The term workplace means a physical location where the agency's work or operations are performed (from 29 CFR 1960.2(t)).
Appendix K. References

1. The following laws and regulations apply to the GSA OSH Program:
   b. Executive Order 12196, Occupational Safety and Health Programs for Federal Employees.
   e. Title 29 Code of Federal Regulations Part 1910, Occupational Safety and Health Standards.
   g. Public Law 95-454, Title VII, Civil Service Reform Act, 5 U.S.C., Sections 7101-7135.
   h. Title 41 Code of Federal Regulations Chapter 102 - Federal Management Regulations.
      i. 9810.1 HCO P (Extended) Injury compensation
      j. 6040.1A HRM GSA Workforce Mobility and Telework Policy

2. The following GSA policies, agreements and standards apply:
   a. American Federation of Government Employees (AFGE) National Agreement.
   c. P100 Facilities Standards for the Public Buildings Service.
   d. HCO P 9810.1 Injury Compensation

3. The following standards, codes, and criteria documents have been adopted for the protection of all GSA employees:
   b. ISO 45001 Occupational health and safety.
c. ISO 31000 Risk management - Principles and guidelines.

d. MIL-STD-882 Department of Defense Standard Practice - System Safety

4. Safety Forms. The following GSA forms are required:

   a. Employee Reports of Unsafe / Unhealthy Working Conditions (See Appendix A-1).

   b. Employee Reports of Unsafe / Unhealthy Working Conditions Log (See Appendix A-2).

   c. Hazard / Deficiency Report (See Appendix F-1).