

# **INTRODUCTION**

## **JOB CORPS SAFETY PROGRAM REVIEW GUIDE**

**OCTOBER 2003**

### **BACKGROUND**

The Office of the Assistant Secretary for Administration and Management (OASAM), the Assistant Secretary of the Occupational Safety and Health Administration (OSHA), and the Assistant Secretary of the Employment and Training Administration (ETA) have entered into a Memorandum of Understanding (MOU) that reflects their mutual concern and interest in the safety and health of students and staff in the Job Corps program. Under this MOU, Job Corps has agreed to ensure that the Safety and Health Program outlined in the Policy and Requirements Handbook (PRH) is implemented by all center operators, and OASAM has agreed to conduct annual onsite safety program reviews at all Job Corps centers.

Because safety is integral to the Job Corps program, it is important that OASAM's safety program reviews incorporate aspects of Job Corps' Program Assessment Guide (PAG), which is used by Job Corps Regional Offices to conduct quality assessments of Job Corps programs. The attached Safety Program Review Guide, which reflects the PAG's emphasis on identifying areas in need of improvement and recognizes best practices, is designed to facilitate better follow-up and sharing of information between OASAM and Job Corps at the national, regional, and center levels.

### **FY 2003 PILOT OF THE GUIDE**

During Fiscal Year 2003 (October 1, 2002 – September 30, 2003), the Safety Program Review Guide was piloted on Job Corps centers. OASAM and Job Corps staff had opportunities to provide feedback as they used the guide, and necessary changes were incorporated into the FY 2004 version of the guide.

### **OVERVIEW OF THE SAFETY PROGRAM REVIEW GUIDE FOR FY 2004**

The Safety Program Review Guide, designed for use by OASAM Regional Safety and Health Managers (RSHMs) and Job Corps staff:

- sets and defines clear expectations for safety programs;
- recognizes best practices and commendable aspects of safety programs; and,
- communicates clearly what needs to be done to improve safety programs.

The Safety Program Review Guide enables RSHMs to determine a reasonably objective numerical rating of a Job Corps center's safety program, using a rating scale like the PAG's nine-point scale:

|   |                               |   |   |   |                           |   |   |   |
|---|-------------------------------|---|---|---|---------------------------|---|---|---|
| 1 | 2                             | 3 | 4 | 5 | 6                         | 7 | 8 | 9 |
|   | Not Acceptable<br>(1.0 - 4.9) |   |   |   | Acceptable<br>(5.0 - 9.0) |   |   |   |

*(See the Rating System section on page 4 of this Introduction for more information on scoring.)*

While all centers are expected to achieve an overall rating of at least a "5.0", indicating that all safety laws, regulations, and requirements are being met, achieving a rating above a "5.0" is a goal to be strived for.

***Note: The Safety Program Review Guide outlines the elements of a model safety program, it serves as a guide to assist centers in developing and implementing strong, effective safety programs.***

## **DESIGN OF THE SAFETY PROGRAM REVIEW GUIDE**

The guide is designed to measure the overall effectiveness of a center's safety program. Several reference sources are incorporated into the guide, including but not limited to: OSHA standards and directives; the Department of Labor Management Series (DLMS); and the Job Corps Policy and Requirements Handbook (PRH).

### **Review Elements**

- The Safety Program Review Guide is comprised of seven elements that address the specific requirements of a comprehensive model safety program. These seven elements are:
  1. **Management Leadership and Student Participation** – Measures visible management interaction and student participation that are necessary for a successful program.
  2. **Workplace Analysis** – Measures actions taken to identify and analyze hazards on center, to aid in the prevention of injuries and illnesses.
  3. **Accident and Record Analysis** – Measures the effectiveness of accident investigation and follow-up, and the use of data to prevent recurrent accidents and injuries.

4. **Hazard Prevention and Control** – Measures the use of engineering and administrative controls and personal protective equipment to minimize exposure to current or potential hazards.
  5. **Emergency Response** – Measures implementation of appropriate planning, training, drills, and equipment for response to emergency situations.
  6. **Safety and Health Training** – Measures whether appropriate training has been completed and documented.
  7. **Written OSHA Programs** – Evaluates the existence, quality, and implementation of required written safety and health programs.
- Five elements have sub-elements and two elements do not.
  - Most stand-alone elements and sub-elements are divided into nine levels, with the first level identifying a non-effective safety program and the ninth level an advanced safety program.
    - Levels 1 - 5 are based upon minimal requirements of a safety program.
    - Levels 6 - 9 are not reflective of requirements per se. However, the measurements and activities included in Levels 6 - 9 are indicative of a more advanced, pro-active, and effective safety program that prepares students to conduct themselves in a safe manner in their future careers.
  - Each level builds on the lower; i.e., the center must complete all of Level 1 to get credit for any item in Level 2.
  - To achieve a level, all criteria and measures in the level must be complete.

Although use of the guide is designed to result in an objective score, there may be occasions when subjectivity is required. In these cases, the reviewer will use his/her professional judgment to evaluate the center impartially and clearly.

### **Review Guide Form**

- The review guide form is divided into the seven elements and sub-elements. Each element has three parts:
  1. **Standard** – Statement of the policy, regulation, standard, or law that is required in Levels 1 - 5.
  2. **Criteria** – Items needed to achieve the standard.

### 3. **Measure** – Items required to achieve the criteria.

- If a measure is met, the line on the guide is annotated as “Go” and the reviewer continues to the next level.
- If a measure is not met, the line is annotated as “Stop” and the element or sub-element is scored not higher than the lowest level filled.
  - In order to ensure that all fundamental safety and health areas are reviewed regardless of whether the center met all measures, **the reviewer will evaluate all elements and sub-elements up to and including Level 5, whether or not a “Stop” is noted.**
  - At Levels 6 - 9, which address safety and health measures that are above and beyond what is required, the reviewer has the option to continue rating all elements and sub-elements even when a “Stop” has been assigned.
  - In fairness to centers, reviewers should continue the review process through Level 9 for centers that achieve at least a 5.0 for the element or sub-element.
- If an item is not applicable to a center, that item is not considered a “Stop” and will not penalize or assist the center in any way. That item is considered “Not Applicable” and will not be averaged into any score. However, the rationale for the determination of non-applicability is required (e.g., “Certification from a qualified asbestos inspector shows that the center is asbestos-free; therefore an asbestos O&M is not required.”)

### **Rating System**

- Each sub-element receives a score equivalent to the highest level filled.
- Each element score is equal to the average of the sub-element scores, rounded to the nearest decimal place. If the element has no sub-elements, the highest level filled is the score for the element.
- The seven element scores are then averaged to produce a final score.
- Final score:
  - Since Levels 1 through and including 5 are based upon federal and DOL standards and regulations, scores of below 5.0 in any element or sub-element are not acceptable. Therefore, if any sub-element or element score is lower than a 5.0, the final evaluation score will be marked “**with serious concerns.**”

- If all element and sub-element scores are 5.0 or higher, the final score will require no notation.
- The score awarded by the reviewer is final.

### **Documentation Examined During Review**

Documentation is critical. Reviewers will assess only the documentation provided to them while they are on center. Should the required documentation not be presented, the center will not be credited with the associated item. The reviewer will give the center safety officer (or designee) an opportunity to present any omitted documentation. Documentation that is created during or after the opening day of the review, however, will not be considered.

### **Interviews During the Review**

The Safety Program Review Guide includes interviews with the center director, staff members, and students to determine knowledge and involvement. In cases where verbal statements and documentation conflict, reviewers will use their professional judgment in deciding whether to award credit.

### **Limitation of the Safety Program Review Guide**

The guide is designed to facilitate the evaluation of safety programs. Use of the guide does not constitute a facility inspection. The guide does, however, evaluate whether proper inspections have been conducted by center staff and outside entities, and whether proper abatement action has been taken.

### **Documentation of Deficiencies and Abatement Activities**

RSHMs and Job Corps centers are required to document deficiencies and abatement activities on the DL1-2029 form via the Abatement Tracking System (ATS) website, which can be accessed at:

<http://isdol01.dol.gov/apps/ats>

## **QUESTIONS**

### **OASAM Regional Safety and Health Managers**

Please submit questions to:

USDOL/Office of Safety and Health, Room C-3317  
200 Constitution Avenue, NW  
Washington, DC 20210  
Attn: Director, Office of Safety and Health

Job Corps Staff

Please submit questions to:

USDOL/ETA/Office of Job Corps, Room N-4463  
200 Constitution Avenue, NW  
Washington, DC 20210  
Attn: Program Analyst, Safety and Health