

LABOR RELATIONS



July 23, 2024

RECEIVED
JUL 25 2024

Mr. Ivan Butts
President
National Association of Postal Supervisors
1727 King Street, Suite 400
Alexandria, VA 22314-2753

Dear Ivan:

This is in further reference to the Postal Service's April 12 correspondence (enclosed) providing notification of revisions to Handbook EL-802, *Executives' and Managers' Safety and Health Program and Compliance Guide*. After further review, the Postal Service has made the following additional revisions:

- Section 1-1 stating the purpose of the revisions is to clarify the responsibilities of non-bargaining employees.
- Section 3-3.2.1 adding "Kaplan" to the health-related awards.
- Updating title Senior Field Safety to Senior Field Safety and Health.
- Appendix – Facility Conditions, second bullet adding "if applicable."

Enclosed are the final draft copies of the Handbook EL-802, one with and one without changes identified.

Please contact Lindsey A. Butler at extension 7194 if you have any questions concerning this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "BAN", written over the word "Sincerely,".

Bruce A. Nicholson
Director
Labor Relations Policies and Programs

Enclosures

LABOR RELATIONS



April 12, 2024

Mr. Ivan Butts
President
National Association of Postal Supervisors
1727 King Street, Suite 400
Alexandria, VA 22314-2753

Dear Ivan:

As a matter of general interest, the Postal Service is revising Handbook EL-802, *Executives' and Managers' Safety and Health Program and Compliance Guide*.

These revisions recognize organizational changes and inclusion of the Safety and Health Management Tool (SHMT).

Enclosed are the final draft copies of the Handbook EL-802, one with and one without changes identified.

Please contact Lindsey A. Butler at extension 7194 if you have any questions concerning this matter.

Sincerely,

for 

Bruce A. Nicholson
Director
Labor Relations Policies and Programs

Enclosure

Executives' and Managers' Safety and Health Program and Compliance Guide

Handbook EL-802
~~2009~~MarchAugust -2024

~~June~~

- A. **Explanation.** This is a complete revision of Handbook EL-802. It addresses changes in the organization, including updated new technology, reference resources, and Voluntary Protection Programs program compliance in the Safety and Health Management Tool (SHMT).
- B. **Availability.** This handbook is available online on the Postal Service™ "PolicyNet" page at <https://blue.usps.gov/cpim/hbkid.htm>.
- C. **Comments.** Address comments or questions regarding the content of this handbook to:
- ~~SAFETY AND ENVIRONMENTAL PERFORMANCE MANAGEMENT-
OCCUPATIONAL SAFETY AND HEALTH (OSH)

EMPLOYEE RESOURCE MANAGEMENT
U.S. POSTAL SERVICE
475 L'ENFANT PLZ SW RM 18319804
WASHINGTON DC 20260~~
- ~~Or send an e-mail to one of the individuals listed on the Safety Resources Point of Contact (POC) page at <http://safetytoolkit.usps.gov/resources/resources.aspx>.~~
- D. **Effective Date.** This publication is effective ~~June 1, 2009~~ March on the date that this edition posts online 1, 2022.



~~Deborah Giannoni-Jackson-Linda
DeCarlo
Senior Director,
Occupational Safety and Health
Vice President~~

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1 Introduction

1-1 Purpose

The Postal Service focuses on engaging in innovative safety efforts to reduce the number of, and prevent, employee workplace accidents and injuries. The purpose of this handbook is to assist Postal Service™ nonbargaining employees, executives, and managers:

- Understand their roles in the Postal Service commitment to safety as a good-smart business practice.
- Get involved in promoting safety programs, and to recognize and correct unsafe acts, working conditions, and practices.
- Ensure accountability for effective programs in all districts, plants, and all of our Postal Service facilities.

The handbook also includes information on management responsibilities under the Occupational Safety and Health (OSH) Act, and on regarding dealing with Occupational Safety and Health Administration (OSHA®) inspections and citations.

1-2 Content Summary

Chapter 1 — Includes the purpose of this handbook, a summary of the handbook's content, and a list of references.

Chapter 2 — Provides an overview of Postal Service obligations under the OSH Act so that managers understand their legal and Postal Service assigned responsibilities in relation to under the OSH Act.

Chapter 3 — Provides tools and information managers needed to become involved in safety as good business, including policy statements, workplace observations, and performance measurement.

Chapter 4 — Provides an overview of the Postal Service Safety and Health program, including information on using the Safety, Environmental, and Ergonomic Resources in the Safety and Health Management Tool ((SHMT)EER) Web site and the Safety Toolkit to manage safety and health programs.

Chapter 5 — Provides information on working with OSHA, including responding to employee complaints, dealing with handling OSHA inspections and citations, and managing citations.

Appendix A — Postal Service Executives' Safety and Health Planner.

Appendix B — Executives' and Managers' Safety Observation Checklist.

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1-3 References

Key references used throughout this handbook ~~and their URLs are provided below include:~~

- *Employee and Labor Relations Manual (ELM)*, Chapter 8, "Safety, Health ~~and Environment and Environment"~~ (~~:-~~ <https://blue.usps.gov/cpim/manuals.htm>).
- *Safety and Health Management Tool (SEER Web site (and link to the Safety Toolkit and the OSHA Citation Management Tool (OCMT):* <http://safetytoolkit.usps.gov/resources/resources.aspx>; SHMT).
- ~~Postal Employees Safety Enhancement Act (Public Law 105-241);~~
- http://www.osha.gov/Other_Docs/USPS/USPS.html; (<https://www.govinfo.gov/app/details/PLAW-105pub241>).
- *Occupational Safety and Health Administration (OSHA) (OSHA-Publication-2098, OSHA Inspections:* [https://www.osha.gov/](https://www.osha.gov/Publications/osha2098.html); <https://www.osha.gov/Publications/osha2098.html>).

For more information on OSHA inspections and compliance activity, and employer rights and responsibilities following an OSHA inspection is available on the "OSHA® FactSheet: Occupational Safety and Health Administration (OSHA) Inspections" at OSHA-

inspections and compliance activity see
<https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf>

*

OSHA Publication 3000, Employer Rights and Responsibilities Following an OSHA Inspection: <http://www.osha.gov/Publications/osa3000.html>

For information on Employer Rights and Responsibilities following an OSHA inspection see the OSHA Inspection Fact sheet, available at <https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf>

2 Regulatory Requirements and Postal Service Policy

2-1 Postal Employees Safety Enhancement Act

2-1.1 **Change in Postal Service Status as Employer Under OSHA**

In 1998, the Postal Employees Safety Enhancement Act (PESEA) changed the status of the Postal Service as an employer under the Occupational Safety and Health (OSH) Act of 1970. Previously, the Postal Service, as a federal agency, had been exempt from the private sector provisions of the OSH Act.¹

2-1.2 **PESEA Requirements and the OSH Act**

When PESEA became effective, the Postal Service, like most private sector employers in the United States, became fully subject to the OSH Act. This means that OSHA has jurisdiction over the Postal Service in matters relating to employee **S**safety and **H**hhealth. The Postal Service must comply with the OSH Act and OSHA standards and regulations. If violations occur, the Postal Service may be cited, fined, and, in extreme cases, referred for criminal prosecution by OSHA.

PESEA also does the following:

- Amends federal law to prohibit the Postal Service from:
 - Considering compliance with OSHA in determining whether to close or consolidate a **P**post **O**office®; or
 - Restricting, eliminating, or adversely affecting any service it provides **as a result of because of** paying a penalty imposed under OSHA.
- Prohibits the Postal Regulatory Commission from considering compliance with OSHA in determining whether to increase rates, and provides that OSHA compliance **shall must** not otherwise affect the service of the Postal Service.

▪ _____

1. Federal agencies are covered under Section 19 of the OSH Act and Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*, February 26, 1980.

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2-2 Postal Service Policy

The Postal Service complies with ~~the~~ OSHA requirements ~~set forth~~ described in 2-1. The Postal Service is committed to:

- Developing and promoting Ssafety programs.
- Recognizing and correcting unsafe acts, working conditions and practices.
- ~~Ensuring~~ Ensuring accountability for effective programs in all ~~districts,~~ plants ~~and all of all its~~ Postal Service facilities.
- ~~Promoting~~ Promoting Ssafety as part of good-smart business practices.
-

See the *Employee and Labor Relations Manual* (ELM), ~~811, 813, 818, 819,~~
~~and~~
~~825.~~

~~3 OSHA Voluntary Protection Programs~~

~~3-1 Purpose~~

~~Working with industry and labor, OSHA created the Voluntary Protection Programs (VPP) to recognize and partner with work sites that implement exemplary systems to manage worker safety and health. Managing safety and health systematically has proven more successful than compliance with specific regulations alone in reducing work-related injuries and illnesses.~~

~~3-2 The Corporate Program~~

~~The Postal Service is a charter participant in the Corporate Program. The objective of this program is to establish an elite category of VPP participation for world-class corporations that have well-established safety and health management systems, uniformly implemented at multiple corporate facilities. The VPP Corporate Pilot provides more efficient processes for the Postal Service to increase its level of participation in VPP. The Postal Service has more sites participating in VPP than any private industry corporation and all federal agencies combined.¹~~

~~3-3 Benefits of Participation~~

~~Participation in VPP offers the following benefits to a work site:~~

- ~~• **Employees** — the foremost beneficiaries of OSHA VPP programs. Employees get involved at their work sites and contribute to safety and health. At day's end, employees go home to their families in a safe and healthy condition.~~
- ~~• **Employers** — a reduction in injuries and illnesses leads to a reduction in associated costs.~~
- ~~• **Unions** — labor-management cooperation on safety and health sets the tone for improved cooperation in other areas.~~
- ~~• **Industries** — VPP sites are models of excellence that can influence best practices industry-wide.~~

~~1. This claim is correct as of the time of publication of this handbook.~~

3-4 Requirements for Participation

Candidates for VPP have the following characteristics:

- Management and all unions commit to participating in VPP.
- The site has implemented a comprehensive and effective workplace safety and health management system that includes four essential elements. Subchapter 4-1, OSHA Voluntary Guidelines, describes these elements in detail:
 - Management leadership and employee involvement.
 - Work-site analysis.
 - Hazard prevention and control.
 - Safety and health training.

Note: By implementing Postal Service policy and Program Evaluation Guide (PEG) requirements, a site will usually fulfill these elements.

- All of the required VPP elements have been in place and working effectively for at least 1 year.
- The 3-year Total Case Incidence Rate (TCIR) and the 3-year Days-Away, Restricted, and/or Transfer (DART) Case Incidence Rate are below the most recently published Bureau of Labor Statistics national average for the comparable industry.
- The site has no open OSHA enforcement activities.

3-5 The Application Process

3-6 Contacts

To participate in VPP, sites must submit an application, which is completed in the Safety Toolkit. Additionally, sites undergo an on-site evaluation by an OSHA team to determine their readiness for VPP. Detailed information on the Corporate Pilot, VPP requirements, and Corporate VPP process are available in the VPP section of the SEER Web page.

For Safety Toolkit access information, see 4-8.2.

Each area has a VPP coordinator who administers Postal Service participation in VPP. Contact information is available on the VPP Resources Web page. If you are interested in having your site participate, contact your area VPP coordinator.

3 -Postal Service Safety and Health Program

4-1 3-1 OSHA Voluntary Guidelines

The Postal Service has ~~adopted the OSHA voluntary a~~ Ssafety and Hhealth ~~program program, which includes the following management guidelines provided below:~~

- A. *Management leadership and employee participation:*
- Management commitment and employee involvement are complementary.
 - Management commitment provides the motivating force and the resources for organizing and controlling activities within an organization.
 - Employee involvement provides the means through which workers develop and express their ~~own~~ commitment to safety and health protection.
- B. *Workplace analysis (surveys and job hazard analysis, inspections and hazard controls, and employee hazard reporting):*
- Work-~~site~~place analysis involves a variety of work-~~site~~place examinations to identify not only existing hazards, but also the conditions and operations where changes ~~might~~may occur to create hazards.
 - Effective management actively analyzes the work and the work-site to anticipate and prevent harmful occurrences.
- C. *Accident reporting, investigation, and analysis:*
- ~~Reporting and Reporting and investigation provides for~~ investigating~~on of~~ accidents and near-miss incidents ~~so that~~and analyzing their causes ~~and helps determine a~~ means for preventing ~~them~~on are identified.
 - Analyzing ~~sis of~~ injury and illness trends over time ~~provides for~~helps identify ~~ication of~~ common causes and development of preventive measures.
- D. *Hazard prevention and control:*
- This activity is triggered by a determination that a hazard or potential hazard exists.
 - Where elimination is feasible, hazards are prevented by effectively designing ~~of~~ job tasks and/or the job site.
 - Where elimination is not feasible, hazards are controlled to

prevent unsafe conditions and unhealthful exposure.

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- Elimination or control is accomplished in a timely manner.

F. *Emergency response:*

Effective emergency response includes written emergency action plans, training, fire inspections, and first aid.

G. *Safety and health training:*

- Effective safety and health training addresses the safety and health responsibilities of all personnel, whether salaried or hourly.
- Safety and health training ~~is~~is most effective when incorporated into other training about performance requirements and job practices.
- The complexity of training depends on the size and complexity of the work ~~site~~place and nature of hazards.
- Effective safety and health training ~~ensures~~ensures that all employees understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards.
- Such training ensures that supervisors carry out their safety and health responsibilities, including: ~~(1)~~
 - ~~—~~ A analyzing the work under their supervision to identify unrecognized potential hazards;
 - ~~—~~ ~~(2)~~ M maintaining physical protection in work areas;
 - ~~—~~ ~~R~~ ~~(3)~~ R reinforcing employee training through continual performance feedback; and
 - ~~—~~
 - ~~—~~ E ~~(4)~~ enforcing safe work practices.

H. *Motor vehicle safety and driver training:*

- Effective motor vehicle safety and driver training ensures proper driver selection, training, and supervision, in accordance with Handbook EL-804, *Safe Driver Program*.
- Such training ensures compliance with U.S. Department of Transportation regulations.

4-23-2 ~~Postal Service~~ Postal Service ~~Corporate~~ Program

34-2.1 Requirements

Managers must demonstrate a commitment to providing safe and healthful working conditions in all Postal Service ~~—~~ owned and ~~—~~ leased installations, along with ~~and~~ being ~~become~~ involved in day-to-day safety performance. They must be held accountable for safety performance and compliance with OSHA standards and regulations.

In facilities that do not have a full-time safety professional assigned, installation heads must designate an Executive and Administrative Schedule (EAS) employee as f Facility s Safety c Coordinator (FSC).

34-2.2 Program Elements

The Postal Service program elements include mManagement cCommitment, involvement, ~~and Accountability~~ and accountability.

- ~~• Accident Reduction Plans.~~
- ~~• Program Evaluations, Inspections, and Improvement Plans, and Written OSHA Compliance Programs.~~
- ~~• Engagement of Postal Service Unions and Employees.~~
- ~~• Safe Driver Program.~~

~~These program elements are described in 4-3 through 4-7.~~

4-33-3 Management Commitment, Involvement, and Accountability

34-3.1 How to Demonstrate Commitment

~~The key steps for demonstrating commitment are set forth below include the following:~~

- ~~Develop a wWritten pPolicy sStatement.~~

~~Executives and managers at the area, district, and plant all levels should ensure that a current written safety policy statement is in effect. This policy should stress that safety is a line-management responsibility supported by Postal Service Ssafety and Hhealth Pprogram professionals and senior management officials.~~

- ~~Establish Personal CommunicationspPersonal cCommunications.~~

~~Executives and managers should:~~

- ~~– Periodically send to targeted audiences memorandums, articles, etc., to targeted audiences highlighting major safety initiatives, success stories, exceptional safety performance, and other safety-related activities.~~
- ~~– Stress commitment, involvement, and accountability to managers and supervisors.~~
- ~~– Publicize information on OSHA compliance activities and the Postal Service Ssafety and Hhealth Pprogram evaluations.~~

- ~~Consider fFunding nNeeds.~~

~~During annual budget reviews, consideration must be given to adequate local funding for the Postal Service Ssafety and Hhealth Pprogram, as noted in ELM section 818, "Safety and Health Program Budgeting."~~

- ~~Establish Executive Safety and Health cCommittees.~~

~~ELM section 815, "Executive and Management Safety and Health Committees," requires executives and managers to establish these committees at all the area, performance cluster, and plant levels. Executives should must ensure that the committees meet at least quarterly and to address the safety program issues, as required by standards in the ELM.~~

▪ **Attend Joint Labor-Management Safety and Health Committee mMeetings.**

Executives and managers should attend meetings of the Joint Labor-Management Safety and Health Committee, and do the following:

- Discuss the Postal Service Ssafety and Hhealth Pprogram and their personal commitment to safety in the workplace and to the program.

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~~4-3.2 Executives' and Managers' Safety and Health- Program and Compliance Guide~~

- ~~- Discuss the committee's function and responsibility, and their expectations of and support for ~~the committee~~ the committee.~~
- ~~- Review local initiatives.~~
- ~~- Review successes and failures.~~
- ~~- Ask about the agenda, minutes, and recurring items.~~
- ~~- Review employee complaints and PS Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*, submitted by employees, and entered into ~~entered into~~ SHMT.~~
- ~~- Review accident data and accident-reduction plan performance as compared to established accident-~~reduction targets~~ reduction targets in SHMT and on the Safety Dashboard.~~
- ~~- Ensure that committee members receive appropriate training.~~
- **Encourage eEmployee pParticipation.**
Executives and mManagers ~~Managers and executives~~ should encourage and be involved in national and local employee participation programs. Consult/Refer to the SHMTSEER Web site for the latest information on national employee participation facility efforts. Also see Chapter 3, OSHA Voluntary Protection Programs.

34-3.2 **How to Demonstrate Involvement**

34-3.2.1 **Conduct Safety-Specific Executive and Management Field Visits**

Field visits present excellent opportunities for Eexecutives and Mmanagers to demonstrate their commitment and direct support for doing business safely. ~~Try Executives and managers should to make focus~~ visits solely for the purpose of demonstrating commitment and involvement in the Sssafety process. Suggested activities for these visits include:

- **Talk with employees and supervisors.**
 - ~~- Discuss local accident experience and employee concerns over safety hazards.~~
 - ~~- Review procedures for reporting hazards and defective equipment.~~
 - ~~- Talk with Joint Labor-Management Safety and Health Committee members.~~
 - ~~- Ask for success stories to share with others.~~
- **Meet with Sssafety professionals and other supporting employees.**
 - ~~- Discuss your support for ~~the sSsafety function~~ and solicit comments on the ~~effectiveness of the~~ local program's effectiveness.~~
 - ~~- Review interaction between Postal Service Ssafety and Health Program and Occupational Hhealth Celaims (OHC) ~~injury compensation~~ functions.~~
- **Attend sSsafety and hHhealth-related awards ceremonies.**

Opportunities include:

 - ~~- National Safety Council's Safe Driver Annual pPin rRecognition, and Kaplan and -Million Mile Awards awards.~~

- Safety Leadership and Vision Award.
- Golden Belt Awards.
- Local ceremonies that acknowledge excellent Ssssafety performance.

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~~Postal Service Safety and Health Program 4-4~~

- ~~Visit employee orientation, craft safety training, and initial-level supervisor, associate, or supervisor refresher training.~~

These activities provide excellent opportunities to discuss:

- ~~How safety is a good smart business.~~
- ~~The Postal Service safety and health programs and processes.~~
- ~~Line-management responsibility and accountability.~~
- ~~Employee rights and responsibilities.~~

34-3.2.2 **Inspect and Observe**

Managers at all levels must periodically spot-check to look for unsafe acts, conditions, and work practices. ~~The Executives' and Managers' Safety Observation Checklist is a good useful tool for conducting inspections. (See the Appendix A).~~

34-3.3 **How to Demonstrate Accountability**

34-3.3.1 **National Performance Assessment**

The National Performance Assessment (NPA) provides scorecards that can be used to monitor performance of the entire enterprise and individual units across the nation. The scorecards include safety performance criteria, such as OSHA Injury and Illness rates, Total Accident Rate, and PEG scores OHC initiatives.

34-3.3.2 **Pay for Performance**

The pay for performance (PFP) program emphasizes the organization's success through objective, measurable performance indicators that are aligned at the corporate, functional, and individual level corporate levels, and that include safety and OHC indicators. Headquarters establishes Postal Service corporate and unit safety and Health Program and OHC indicators and targets. By implementing effective program management and accident-reduction programs, executives and managers can achieve these targets.

Note: Executives' and managers' performance in this program are is measured based on Postal Service Safety and Health Program performance.

34-3.4 **Resources**

See 4-8.1, SEER Web Site, and 4-8.2, Safety Toolkit SHMT and the OHSafety Scorecard Dashboard.

4-43-4 Accident Reduction ~~Accident-Reduction~~ Plans

These Accident-reduction plans target specific Postal Service Safety and Health Program indicators (such as slips, trips, and falls) with specific countermeasures actions and tasks to reduce the number of accidents. Each year accident-reduction plans that target specific Safety and Health Program indicators must be implemented and tracked and tracked in.

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3-5 3-5-Inspections, Improvement Plans, and Written OSHA

-Compliance Programs

The following includes benefits of safety inspections, safety-improvement plans, and OSHA safety-compliance programs, and information on templates available for OSHA safety programs:

- Inspections identify hazards.
- Improvement plans identify procedures to abate hazards.
- Templates for OSHA-required written programs ensure compliance with specific OSHA standards. -Templates are available for programs, such as hazard communication, personal protective equipment, and confined-space safety. Templates are also available on the following safety topics:

- Asbestos.
- Bloodborne pPathogens.
- Confined Space
- Electrical wWork pPlan
- Hazard Communication
- Hazardous mMaterial.
- Hearing cConservation.
- Lead.
- Personal Protective Equipment
- Respiratory pProtection. -

Templates are available for programs such as hazard communication, personal protective equipment, and confined space safety.

4-5 Executives' and Managers' Safety and Health Program and Compliance Guide

4-5 Program Evaluations, Inspections, and Improvement Plans, and Written OSHA Compliance Programs

- The Program Evaluation Guide (PEG) process is used to measure and improve facility safety programs.
- Inspections identify hazards.
- Improvement plans identify procedures to abate hazards.
- Templates for OSHA-required written programs ensure compliance with specific OSHA standards. Templates are available for programs such as hazard communication, personal protective equipment, and confined space safety.

4-63-6 Engagement of Postal Service Unions and Employees

Effective engagement promotes employee involvement and includes agreements with unions on specific Postal Service Safety and Health Program initiatives ~~and promotes employee involvement.~~ (Also see Article 14 of the labor-contract Agreements (contracts) between the Postal Service and national unions.) Examples of effective engagement:

- Participation in the Ergonomic Risk Reduction Program and VPP.
Promoting active participation in practicing Safety and Ergonomics in the workplace.
- Providing methods for employee feedback on ideas to improve safety.
- Showing to employees the Postal Service Safety and Health Program the video series, "Safety Depends on Me," which enables communication with employees on safety and fosters motivation for using safe practices.

4-73-7 Safe Driver Program

The Safe Driver Program focuses on preventing motor vehicle accidents by providing detailed guidance on how to select and train individuals who will drive vehicles for the Postal Service as part of their job responsibilities. The program also provides guidance on refresher training for Postal Service drivers. For further information, see Handbook EL-804, *Safe Driver Program*.

4-8 Resources

3-8 34-8.1 SEER Web Site Safety and Health Management Tool (SHMT) HMT

3-8.1 Purpose

The Safety and Health Management Tool (SEER-SHMT) Web site is designed to be used by all levels of the organization, FSCs, PEG-coordinators, VPP-coordinators, managers, supervisors, and providing managers and all other eEmployees havewith access to who are looking for information about Postal Service sSafety, and hHealth Program inspections, accident and hazard reporting, and tools to the tracking safety-program - progress, and environmental information.

34-8.21.1 Content

SEER-SHMT provides access to the information and tools needed to manage implementation of corporate-wide ssafety and eenvironmental programs. The

SHMT provides Postal Service employees with a wealth of sSafety, hHealth, eEnvironmental, and eErgonomics information.

The"" SHMT library contains the accident-reduction information. This site also provides the following resources, including but not limited to:

- Guidance and tools for managing accident-reduction plans and goals.
- Best practices and countermeasures.
- Tools for data management and accident analysis.
- National Job Safety Analyses (JSAs) for many tasks for local adaptation.
- Safety iInspection cChecklists based on:
- Written program guides and templates for 10 OSHA standards.
- Guidance and references for sSafety and hHealth topics, such as:
 - Developing Emergency Action Plans (EAPs).
 - Reporting on motor vehicle and industrial accidents.
 - Giving sSafety talks (including sample sSafety talks on many topics).
- Links to Postal Service safety references (manuals, handbooks, management instructions, etc.).

3-8.1.23 Access

To access the to-SHMT:

- Go to Blue at <https://blue.usps.gov>.
- Click on MyHR on the bar at the top of the page or Featured Topics at left

on the page.

- Under *MyHR* click on “-Safety & Labor-” and then “Safety Tools for Managers.”

From the Blue Page, Under *Featured Topics*, click on “Front Line Supervisor’s Toolkit, and then the tab, “Apps/Tools.” Under “Apps/Tools” click on “SHMT.”

Click the tab.

- Then scroll down to “Safety & Health Management Tool (SHMT).”

Contact the Local Safety office or OHC for additional assistance.

site provides Postal Service employees with a wealth of safety, health, environmental, and ergonomics information.

Note: The SEER Resources Page is **not** the Safety Toolkit. The Safety Toolkit is a separate tool, used by safety team members for specific tasks (see [4-8.2](#)).

Under Safety Programs, SEER provides a link to the Accident Reduction Center. This site provides the following:

- Guidance and tools for managing accident reduction plans and goals.
- Best practices and countermeasures.
- Tools for data management and accident analysis.
- National Job Safety Analyses (JSAs) for many tasks for local adaptation.
- Safety Inspection Checklists by facility size.
- Written program guides and templates for 10 OSHA standards.
- Guidance and references for safety and health topics such as:
 - Developing Emergency Action Plans (EAPs).
 - Responding to emergencies (e.g., national disasters, suspicious mail, and other threats).
 - Reporting on motor vehicle and industrial accidents
 - Giving safety talks (including sample safety talks on many topics).
 - Participating in Voluntary Protection Programs.
- Information about topics such as mold, emergency eyewash units, roof safety, etc.
- Links to Postal Service safety references (manuals, handbooks, management instructions, etc.).

4-8.1.2 Access

To access SEER to SHMT:

- Go to <http://blue.usps.gov> (see [Figure 1](#)).
- In the left column, click [Safety and Environmental Resources Under My Work Tab](#)
- [Safety Resource Tools](#)
- [Report an Accident or Hazard](#)
- [Contact Local Safety or OHC for additional assistance.](#)
- On the SEER Web page (see [Figure 2](#)), click on a topic of interest in the left column.
- To display additional information, click on the links on the page or click on the topical text selections in the right column.

~~June 2009~~ January 2022 ~~113~~

Figure 1

[Postal Service Blue Web Page](#)

A-Z Occupational Safety & Health Topics

A **B** **C** **D** **E** **F** **G** **H** **I** **J** **K** **L** **M** **N** **O** **P** **Q** **R** **S** **T** **U** **V** **W** **X** **Y** **Z**

S

[Safety Awareness Campaigns](#)
[Safety Depends on Me](#)
[Safe Driving](#)
[Safety Inspections](#)
[Safety Talks](#)
[Safety Time Out \(STO\)](#)
[Safety Training](#)
[Serious Accidents](#)
[Service Contracts for Safety and Industrial Hygiene Work](#)
[Safety & Health Management Tool \(SHMT\)](#) 
[Silica](#)
[Slip, Trip, and Fall Prevention](#)
[Spill and Leak Response](#)
[SST \(Site Specific Targeting\)](#)
[Suspicious Mail](#)

Home | My Work | My Life | Inside USPS | Monday, December 6, 2010

Essential Links <ul style="list-style-type: none"> Accounting BlueTube(R) Board of Governors Connecting with Customers Continuous Improvement Corporate Information Security Office Corporate Library CSDC Delivering for America Digital Signature eAccess eAwards eBuyPlus eCareer eHRSSC forms Election Mail Employee deals Environmental Affairs ePerformance Sustainability ePayroll ePassword reset eRMS eTravel Executive Leadership Team Facilities Response Line Family Medical Leave Act (FMLA) Find it Fleet Commander Online (FCO) Forms Fuel Asset Management System (FAMS) Global Trade Compliance HERO HO Parking App 	General Tools <ul style="list-style-type: none"> ACE ARIS Attendance Control Training CAMS eAccess eBuyPlus eFlash Cards eRMS eTravel Enterprise Data Warehouse GetThere Network Operations Dashboard Postal Explorer Section 508 SPEC (Formerly Pub 112) TACS Transfer of Accountability Forms UPU 	Moving The Mail Tools <ul style="list-style-type: none"> AMS DPFNow AVUS CPMS CSDRS Delivery Helper DOIS DMS (Delivery Management System) EDDM Lookup eMARS Employee BarCode eUARS FAMS FCO (Fleet Commander Online) IMDHELP Informed Visibility (Mailier) Informed Visibility (Postal) MHTS MSP MTES MTSC Perfect Package Experience PO Boxes Blue PostalPro Postmaster's Toolkits Product Tracking & Reporting Rate Calculators RSS Track and Confirm Variance Programs WebBATS 	Track & Confirm Select Timeframe Recent Items <input type="radio"/> Over 120 Days Old <input type="radio"/> <input type="text" value="Enter Item Number"/> <input type="button" value="Go"/> Calendars Monthly Planning Calendar Contains pay periods, pay dates and holidays <ul style="list-style-type: none"> FY 2022 Monthly Planning Schedule - pdf excel FY 2021 Monthly Planning Schedule - pdf excel FY 2020 Monthly Planning Schedule - pdf excel FY 2019 Monthly Planning Schedule - pdf excel TACS Monthly Planning Calendar Contains pay periods, pay dates and holidays <ul style="list-style-type: none"> 2022 Monthly Planning Schedule - pdf excel 2021 Monthly Planning Schedule - pdf excel 2020 Monthly Planning Schedule - pdf excel 2019 Monthly Planning Schedule - pdf excel
<ul style="list-style-type: none"> Postmaster's Toolkit Product Tracking & Reporting Rate Calculators RSS Track and Confirm Variance Programs WebBATS 	HR Professionals' Info <ul style="list-style-type: none"> Benefits Calculators Compensation Calculators Computerized Bidding Info eMedical Assessment ICPAS Interviewer's Toolkit Overview of Personnel Selection Methods Qualification Standards 	Customer Contact Tools <ul style="list-style-type: none"> Business Connect CICRS ECRS COARS Customer Insights 2.0 Platform EDW Home Marketing Intelligence Library PostalOne! 	References Policies <ul style="list-style-type: none"> Management Instructions PolicyNet Manuals <ul style="list-style-type: none"> ASM - pdf text DMM - pdf text IMM - pdf text PCIM - pdf text PM - pdf text ELM - pdf text Library <ul style="list-style-type: none"> USPS Corporate Library More References >>

United States Postal Service Intranet - Home - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Address http://blue.usps.gov/wps/portal

Welcome to the United States Postal Service Intranet

Log On Home My Work My Life Inside USPS Search | Contact Blue | Help | usps.com

Advanced Search Search Tips

Essential Links

- eAwards
- eBuy
- eLearning
- ePassword Reset
- eTravel
- Find It
- Forms
- IT Self Help
- MTSC
- My Post Office
- News
- NPA
- Phone Directory
- PolicyNet
- PostalEASE
- Postal Explorer
- PostalOne!
- PostalPEOPLE
- Safety and Environmental Resources
- TACS
- WebEIS

Home Favorites

Log On to customize your favorite links on the home page.

Report Computer

TOP STORY

Direct from Donahoe

DPNG Talks about USPS short-term goals

Mar. 3 - Today is the debut of the latest installment of DPNG and Chief Operating Officer Pat Donahoe's online video series, *Field Updates*.

In this week's presentation, Donahoe goes into detail about controlling fixed and variable costs. He discusses the need to match work hours with workloads and focuses on the Postal Service's short-term goals to reduce expenditures, offering several cost-saving tips.

Full Story

usps news|link [Link Online News Archive - Did You Know? Archive](#)

Hot Topics

- Organization Changes: Updated 2/9/09
- Voluntary Early Retirement: Updated 10/3/08
- Save Money and the Environment: Updated 2/23/2009

Corporate Focus

- Annual Report 2008
- Comprehensive Statement 2008

Employee Resources

- Organization Changes - Updated 2/9/09
- Open Season Benefits Election
- Other Benefits and Payroll Elections
- Combined Federal Campaign (CFC)
- eIdeas
- Employee Self Service
- Employee Assist. Program
- Factiva NewsPages
- Flexible Work Arrangement
- Jobs
- Labor Relations
- Pay For Performance
- Postal Bulletin
- travelhelp
- Voluntary Early Retirement

More HR Information >>

Brave new shipping world

USPS now has unprecedented pricing flexibility. [Read More >>](#)

USPS-TV - Video

MAILING SERVICES PRICE INCREASES

Local intranet

Figure 4
Postal Service Blue Web Page

Safety & Health Management Tool (SHMT)

[How to Report a Hazard Event](#)

[How to Add Statements, Evidence, Causes and Action Plans](#)

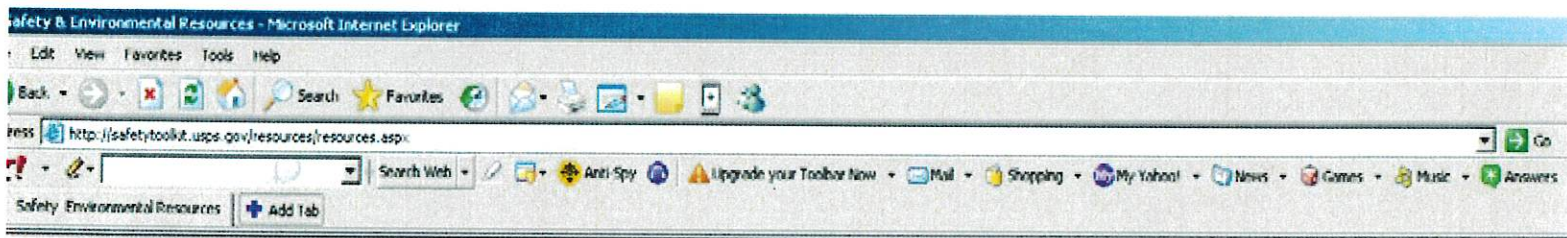
[How to Report Accident Events](#)

[SWI Gatekeeping Safety](#)

[SWI OHC Claim with out SHMT Event](#)

[SWI SHMT Event without ECOMP or Claim](#)

[SWI Revised SHMT Gatekeeping Occupational Health Claims](#)



UNITED STATES POSTAL SERVICE. Safety, Environmental, and Ergonomic Resources

[To download this document right click here and select "Save Target As..."](#)

Resources Home

Welcome to the Safety, Environmental, and Ergonomics Resources Page

Please click on the topic you desire in the left navigation bar - once the selected page is opened additional links will appear in the center area or right navigation bar.

Please check the What's New Sections often

- NEW!** [Information About Recycling at Headquarters](#)
- NEW!** [InfoPak - Management of Tritium-Containing EXIT Signs](#)

Resources Home

Safety Resources

- [Safety Home](#)
- [Safety's What's New](#)
- [Safety's What's New](#)
- [Safety Area Pages](#)
- [Safety Programs](#)
- [Safety Training](#)
- [Safety Useful Links](#)

Environmental

- [Environmental Home](#)
- [Environmental What's New](#)
- [Environmental POCs](#)
- [Environmental Area Pages](#)
- [Environmental Programs](#)
- [Environmental Training](#)
- [Environmental Useful Links](#)

Ergonomics

- [Ergonomics Home](#)
- [Ergonomics What's New](#)
- [Ergonomics POCs](#)
- [Ergonomics Area Information](#)
- [Ergonomics Process](#)
- [Ergonomics Training](#)
- [Ergonomics Useful Links](#)

Quick Links

- [Search Results](#)
- [LMA](#)
- [DSI HomePage](#)
- [Safety Design](#)
- [Safety InfoPak](#)
- [Safety Smart](#)
- [Safety Toolkit](#)
- [Safety Training](#)
- [USPS Public Environmental Site Map](#)

Figure 2
SEER Web Page



4-8.2 Safety Toolkit

4-8.2.1 Content

The Safety Toolkit (STK), available through the SEER Web page, is a Postal Service application used by safety specialists, safety managers, installation and facility heads, postmasters, maintenance managers, supervisors, PEG coordinators, and VPP coordinators to complete specific tasks. The STK is used to:

Prepare and manage accident reduction and hazard abatement plans. (Safety professionals use portable HP iPAQ PDAs to record and upload safety inspection findings for abatement tracking.)

Manage VPP data, program improvement plans, OSHA citations (with the OSHA Citation Management Tool), and employee hazard report logs.

Executives and managers must become familiar with the performance reports available in the STK. These include:

Area, performance cluster, and facility-level reports.

Abatement plans, PEG scores, safety and health program improvement plans, hazard report logs, and VPP data.

4-8.2.2 Access

STK access is available to permanent EAS employees. The eAccess system grants access based on a user's role. After a request is approved, the user is granted access to selected modules in the STK, depending on the user's assigned role.

To request access:

Go to <http://blue.usps.gov>.

Type "eAccess" in the URL bar and hit enter.

Select "ACE User" and click *Enter Application*.

Log on using your ACE login and password.

In the "Request Access" box at upper right, click *Applications*, type in "STK," and click *Search*.

Click *Safety Toolkit*.

Review your "User Details" and update if necessary.

Enter the *Request Setup Information*, *Dependent Request Setup Information*, *Request Related Processing Instructions*, and *Manager Information*. (To simplify the approval process, choose the lowest level of access you need in the Role(s) item — this means fewer approvals will be needed during the review process.)

Click *Next* after all items have been completed.

Review "Request Summary."

Click *Submit Request*.

Once access is approved, go to the SEER page to access the STK. The link for the STK is under "Quick Links" in the right column. (See [Figure 2](#).)

4-8.2.2 Executives' and Managers' Safety and Health Program and Compliance Guide

From the STK opening page, use the left column to locate the module you want to use. Click on the module name and it will display.

The STK Help Module provides a great deal of information on how to use the STK. Key Help Module content includes:

User's Guide.

Web Module Movies, an automated tutorial that follows the User's Guide.

VPP User's Guide.

Frequently asked questions (FAQs).

Form for submitting questions about the STK.

The Help Desk Support Number, 1-800-688-0321, is available from 8:30 a.m. to 5:00 p.m. EST.

Dealing With OSHA

~~5~~ Dealing With OSHA

~~5-14-1~~ Investigating Employee Safety and Health Complaints

~~45-1.1~~ Complaints and Inspections

~~45-1.1.1~~ Employee Complaints to OSHA

Many investigations and inspections result from employee complaints. The most effective method to reduce the number of employee complaints to OSHA is to ensure that:

- ~~• The PS Forms 1767, Report of Hazard, Unsafe Condition, or Practice or Practice, —~~
- submitted by employees, or entered into entered into SHMT, are handled expeditiously.
- Hazards are abated in accordance with existing Postal Service policy and documented in accordance with requirements in the —ELM.

~~45-1.1.2~~ Handling Complaints Internally

If, for whatever reason, an employee or employee representative still complains to OSHA, there still may be an opportunity to address the complaint internally, as follows:

- OSHA procedures allow for contacting the employer to:
 - ~~— A(1) advise management of the complaint;~~ and
 - ~~— R(2) request an investigation and correction of hazards by the employer.~~
- Managers may avoid an unnecessary inspection by:
 - ~~— R~~responding in within 5 working days and correcting any hazards;
 - ~~— P~~posting the information that the complaint has been addressed and any hazard corrected; and
 - ~~N~~otifying employees of any hazard and that it has been corrected; ~~M~~anagers may avoid an unnecessary inspection.
- Managers may also request additional time and dispute complaints with detailed evidence of the conditions. OSHA shares the information

obtained from management with the -complainants.

▪ OSHA has wide discretion to forego an inspection if OSHA personnel believe the hazard:

- ~~D~~-either (1) does not exist, or

- ~~H(2)~~ has been abated.

45-1.1.3 NIOSH Health Hazard Evaluations

Based on employee complaints, the National Institute for Occupational Safety and Health (NIOSH) may indicate the intent to conduct a Health Hazard Evaluation (HHE). A ~~mm~~manager who receives a written or telephone notification that NIOSH intends to conduct an HHE must immediately -contact ~~the Manager, Safety (Area) Sr. Senior Field Safety and Health Specialists~~. Managers ~~cannot must not~~ refuse an investigation or deny NIOSH entry onto the premises. ~~However, but~~ they ~~can may~~ request time to coordinate with ~~the Manager, Safety (Area) Sr. Senior Safety and Health Specialists~~. A ~~mm~~manager ~~should must~~ not initiate a ~~request to NIOSH for an HHE without consulting with Area Safety Sr. Senior Field Safety and Health~~.

request to NIOSH for an HHE without consulting with the Manager, Safety (Area) Sr. Field Safety.

45-1.2 Steps to Take

Managers must should take the following steps to ensure the expeditious handling of that employee safety complaints are handled expeditiously:

- Ensure that PS Forms 1767 submitted, or entered into entered into SHMT, by employees are properly tracked, and responded to, and recorded in the STK in accordance with ELM section 824.6, "Investigating Employee Reports of Hazard, Unsafe Condition, or Practice."
- Hold sSupervisors responsible for timely responding timely to submitted PS Forms 1767.
- Place the highest priority on responding to requests by OSHA for investigation of employee complaints, as follows:
 - Upon receipt of such a request, notify the installation head and the supporting Safety Office.
 - Make sure the response to OSHA is signed by the installation head and transmitted on time (within 5 working days).
- Notify the Manager, Safety (Area) Sr. Senior Field Safety and Health if NIOSH communicates the intent to conduct an HHE.

5-24-2 OSHA Inspections and Citation Management — Postal Service Responsibilities

45-2.1 Executives and Managers

Executives and mManagers must do the following:

- Achieve compliance with OSHA standards as part of their overall sSafety and hHealth responsibilities.
- Lead the OSHA compliance effort.
- Review and be familiar with ELM section 825, "OSHA Inspections." (The ELM is available at <https://blue.usps.gov/cpim/manuals.htm>.)
- Review OSHA guidance on conducting of inspections, information on eEmployer rRights and rResponsibilities, and other Ssafety and Hhhealth information available at <https://www.osha.gov>.

45-2.2 Installation Heads

Installation heads must do the following:

- Achieve compliance with OSHA standards within the facilities under their control.
 - Review and be familiar with ELM [section 825](#), “OSHA Inspections.” (The ELM is available at <https://blue.usps.gov/cpim/manuals.htm>.)
- Review OSHA guidance on conduct-~~of~~ing inspections, [information on](#) employer rights and responsibilities, and other ~~s~~safety and ~~h~~health information available at <https://www.osha.gov>.

For more information on OSHA inspections and compliance activity, and employer rights and responsibilities following an OSHA inspection is available on the "OSHA® FactSheet: Occupational Safety and Health Administration (OSHA) Inspections" at

[https://www.osha.gov/sites/default/files/publications/factsheet-](https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf)

[inspections.pdf](https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf). OSHA inspections and compliance activity see Publication-

2098, available at <http://www.osha.gov/Publications/osha2098.html>

<https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf>.

For information on Employer Rights and Responsibilities following an OSHA inspection see the OSHA Inspection Fact sheet, available at e Publication-3000, available at <http://www.osha.gov/Publications/osha3000.pdf>.

45-2.3 Safety and Environmental Performance Management Occupational Safety and Health (OSH)

Safety and Environmental Performance Management (SEPM), OSHHS Headquarters: Employee Resource Management (ERM), Headquarters:

- Oversees the citation management process for Headquarters.
- Coordinates responses to citations for violations with the General Counsel and affected Headquarters organizations responses to citations for violations organizations.
- Provides Oversees quality control oversight of the citation information entered in the OSHA Citation Management in SHMT Tool (OCMT).
- Resolves discrepancies in the information with the responsible safety specialist.
- Performs analysis Analyzes of the citation information.
- Reports the results of the analysis to key Postal Service personnel.
- Identifies national opportunities to prevent further citations and improve safety and health programs based on the analysis of the citation data.
- Provides Assists on-site assistance into the resolution of citation issues as required.

45-2.4 General Counsel

The Postal Service General Counsel's centralized OSHA Unit:

- Oversees the legal aspects of the citation management process nationally, both at Headquarters and in the field.
- Approves Is responsible for approving all citation-related correspondence to be sent to OSHA.
- Prepares all protective notices and notices of contest and mails them to OSHA.
- Prepares all protective notices and mails them to OSHA.
- Prepares and distributes additional correspondence to OSHA for on selected citations as determined on a citation-by-citation basis.
- Provides consultative assistance to Occupational Safety and Health.

~~f~~Field staff and Senior ~~Sr.~~Field Safety and Health personnel (SEPM).

- ~~Provides on-site assistance to~~Helps Occupational Safety and Health ~~f-~~Field staff and ~~Sr.~~Senior Field Safety and Health personnel in the resolution of ~~resolve~~ citation issues ~~as needed~~.
- ~~Oversees and handles~~ Accomplishes all required litigation with the Occupational Safety and Health Review Commission and federal courts.

~~Resolves discrepancies in the information with the responsible counsel.~~
14

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~~45-2.5~~ **Managing Counsels in Field Offices**

~~Managing counsels in Postal Service field offices:~~

- ~~— Maintain close coordination with the General Counsel.~~
- ~~— Oversee the legal aspects of the citation management process in the field.~~
- ~~— Approve all citation-related correspondence sent to OSHA.~~
- ~~— Prepare all notices of contest and mail them to OSHA.~~
- ~~— Prepare all protective notices and mail them to OSHA.~~
- ~~— Prepare and distribute additional correspondence to OSHA on selected citations as determined on a citation-by-citation basis.~~
- ~~— Provide consultative assistance to performance cluster field and area safety Sr. Field Safety personnel.~~
- ~~— Provide on-site assistance in the resolution of citation issues as needed.~~

~~45-2.56~~ **Maintenance Policy and Programs, Engineering**

Maintenance Policy and Programs, Engineering, Headquarters:

- ~~Assists in the Help~~s implementation of programs to abate systemic maintenance-related hazards.
- Distributes OSHA citation information to appropriate personnel.

~~45-2.67~~ **Maintenance Operations (Area)**

~~The~~ Managers of Maintenance Operations (Area):

- Oversee ~~the~~ abatement of hazards resulting in violations in their area of responsibility.
- Support ~~d~~district and ~~p~~plant ~~m~~managers in ~~the~~ abating ~~ement~~ of hazards.
- ~~Assist in the Help~~s implementation of programs to abate systemic maintenance-related hazards.

~~45-2.78~~ **Facilities Service Offices**

Personnel in ~~the~~ Facilities Service ~~o~~ffices ~~ensure~~ ~~confirm~~ that processes are in place to ensure prioritization ~~of~~ ~~ing~~ projects based on OSHA citations and abatement schedules.

- Identifies additional information needs for the environmental program and coordinates with Manager, OSHA Coordination, to obtain the needed information.
- Distributes OSHA citation information that may impact the environmental program to headquarters and field environmental personnel.

45-2.8940 **Safety Specialists and Analysts**

~~District and Field plant ss~~ Safety specialists, assigned by ~~the mM~~ managers of Safety and Health within each ~~performance cluster~~ field office, enter OSHA inspection and citation data into ~~the OCMTSHMT~~. To perform this task, they must:

- Enter citation information for facilities in their area of responsibility (including Headquarters field units) as soon as they are received, but no later than by close of business (COB) on the day the citation is received from OSHA.
- Fax or e-mail copies of the citation to SEPMOSH, ~~and~~ the General Counsel at Headquarters, ~~and to Seniorr. Field Safety and Health the Manager, Safety- (Area)~~, preceding the faxes or emails with a telephone call.
- Keep the citation information current and accurate as hazards are abated and citation management activities progress. Enter this information as soon as these activities are accomplished, but no later than COB that day.
- Enter abatement actions as soon as they are accomplished, but no later than COB that day.
- Keep informed the Manager, Safety (Area) Seniorr. Field Safety and Health and the responsible manager-informed.
- ~~Keep the responsible manager informed.~~
- Facilitate abatement actions with responsible managers.
- Before transmittal, cCoordinate all citation-related correspondence to OSHA with SEPM-OSH, ~~and~~ the General Counsel at Headquarters, ~~and with~~ managing counsels, field offices, and Manager, Safety (Area) Seniorr. Field Safety and Health. before transmittal.

54--2.9140 **Safety (Area)Senior Field Safety and Health**

~~The Managers, Safety (Area)The Seniorr. Field Safety and Health personnel~~ will oversee the citation management process within their areas. The Senior Field Safety and Health personnel:

- Identify facilities, program areas, and procedures within their areas that require improvement, and notify management.
- Assist in the Support implementation of nationally targeted efforts to improve program areas and procedures.

-
- ~~Before transmittal, c~~Coordinate all citation-related correspondence to OSHA with ~~SEPM-OSHHS, and~~ the General Counsel at Headquarters, and with their area ~~Legal Department~~ staff representative ~~before transmittal~~.
-

~~5-34-3 The~~ OSHA Citation Management ~~Tool in~~ SHMT

~~45-3.1~~ **About the SHMT**~~OCMT~~

~~The Safety and Health Management Tool (The OCMT-SHMT)~~ is a real-time application that ~~sS~~safety ~~sS~~specialists use to record OSHA inspection and citation information. Once ~~sS~~safety ~~sS~~specialists ~~digitally~~ enter ~~the~~ key information from OSHA citations, the information is made ~~electronically~~ available in a series of views, reports, and charts. ~~OCMT-SHMT~~ users ~~with~~ ~~authorized access may can~~ view the data or print the presentation-quality reports and charts. The views, reports, and charts present the inspection information in logical, easy-to-understand formats that simplify ~~anal~~analyzing~~ysis~~ of the data.

5-3.2 Executives' and Managers' Safety and Health Program and Compliance Guide

The goal/benefit of using the OCMT-SHMT is to provide quick and reliable access to OSHA

inspection information so that managers:

- Managers address citation settlement promptly.
- Managers ensure prompt abatement of hazards.
- Managers see the types of citations their facilities or like facilities receive and take appropriate preventive or corrective action at their facilities.
- Managers can identify trends in the OSHA citations and develop action plans to prevent similar citations at like facilities.

SHMT also allows the Postal Service to maintain an accurate electronic record of OSHA citations.

45-3.2 Access

The opening inspection screen shows the main view of the citation data,

year-to-date, and provides:

- A list of inspections by area and access to the full text of each inspection report via hyperlinks.
- Access to data-entry forms for new citations by:
 - Clicking the "New Audit" tab at the top of the left on the home page, as follows.
 - Then clicking "inspection Management-the citation number link to display general information on the specific citation;" and then
 - Clicking on the Violations tab at the top of the page "inspections."

To and located the applicable OSHA inspection, utilizing the search option to view the details of each violation associated with the citation. To review entries,

Click the reports tab at the top of the page or click the reports module in the left navigation bar.

Select OCMT from the drop-down list to display the menu of reports for OSHA citations.

OCMT data is available for analysis using a series of six different summary and detail reports and one chart. The Select report titles clearly tabs located at the bottom of the page.

to review entries, describe the information presented in each of the reports.

To assist users For help, OCMT offers the following modules/contact Senior Sr. Field Safety or Local Field Safety. :

Help — Provides access to the online user's manual, the toll-free help line, and a quick way for users to send suggestions for improvement to the STK management team.

Search engine — Provides the capability to search the database by key words.

Appendix A

Postal Service Executives' and Managers' Safety and Health Planner

Demonstrate Safety Principles	Activity	Oct Yes	Nov No	Comments/Required Actions
Personal Commitment	Post <u>the</u> current policy statement.			
	Send memos to targeted employee groups.			
	Prepare articles on safety issues.			
	Review <u>the</u> budget for safety issues.			
	Review accident data (<u>SHMT and the Safety Dashboard</u>).			
	Establish <u>a</u> Accident- <u>r</u> Reduction <u>p</u> Plans.			
	Establish an Executive Safety and Health (<u>S&H</u>) Committee- (<u>Area, PC, Plant</u>)			
	Attend Executive S&H- Committee meetings (quarterly).			
Involvement in Safety	Conduct field visits.			
	Meet with <u>the</u> craft <u>s</u> supervisor.			
	Meet with <u>s</u> Safety staff.			

	Attend ceremonies (e.g., <u>Safety and Ssafe Ddriver - awards awards, VPP</u>).			
	Visit orientation and training sessions.			

<u>Demonstrate Safety Principles</u> <u>Demonstrate Safety Principle</u>	Activity	Oct <u>-Yes</u>	Nov <u>-No</u>	<u>Comments/Required Actions</u>
<u>Facility Conditions</u>	Inspect and Ob observe:			
	▪ <u>Facilities – clear aisles and passageways, exits, etc.,etc.</u>			
	▪ <u>Vehicles – vehicles off street and chocked; if applicable; vehicles in good condition.</u>			
	▪ <u>Driving – driver's license checked.</u>			
	▪ <u>Work practices and behaviors.</u>			
	Check paperwork and records.			
<u>Accountability</u>	<u>Inspect and Observe</u> Review:			
	Review i inspection and action plans (in SHMT) data.			
	Review a accident reduction target progress (Safety Dashboard).			
	Review OSHA citations and abatements (in OCMT); <u>reduction target progress (Safety Dashboard)</u>			
	Ensure that personnel evaluations i include safety performance.			
	<u>OSHA 300a posted from Feb 1 – AprilFeb 30)?.</u>			
	<u>Ensure that 5 years of OSHA records are available for review.</u>			
	<u>Review any past OSHA inquiries to ensure that the facility is in compliancecomplies with OSHA requirements.</u>			

Appendix B

Executives' and Managers' Safety Observation Checklist

When in a facility check for:

- Housekeeping. Are floors free of slip, trip, fall hazards; are storage areas clean and neat?
- Blocked or unmarked exits.* Are all emergency exits marked as exits?
- Are routes to exits clear, unobstructed, and marked with readily visible signs?
- Suspect electrical or wiring conditions.* Are outlets in good condition and free of exposed wires?
- Are extension cords used only for temporary wiring purposes?
- Guarding and condition of mechanization.* Are there missing guards on MPE, nonoperational warning lights?
- Condition of mail transportation equipment. Is mail transport equipment in good condition, free of sharp edges and broken parts?
- Condition of lobbies and customer service areas. Are lobbies and customer service areas neat, clean, and free of slip, trip, and fall hazards, sharp edges, and items that could fall?

Check vehicles for:

- Notice 76, *Expanded Vehicle Safety Check*.
- Accident reporting kits. Are driver daily vehicle inspection records on file and complete?
- Unrepaired and/or unreported damage. Are vehicles in good condition?
- Parking procedures. Are vehicles parked correctly to limit roll away/run away?
- Observe work practices in facilities and on the street for:
 - Handling and lifting. Do employees use proper lifting techniques?
 - Pushing and pulling. Ensure employees push rather than pull equipment. —
 - Footwear. Do employees wear slip-resistant footwear that is in good condition?
- Lockout/tagout procedures.*
- Are records of safety talks available for review?
- Driving. Are semi-annual supervisor driver observations on file and complete?
- Contractor safety performance.*
- Employee postures/hand mechanics.

Check paperwork and records for:

- Required training is delivered and documented.* Are employee training records available for review?
- PS Form 1767, *Report of Hazard, Unsafe Condition, or Practice*, is handled promptly.* Is the Hazard Log maintained in the Safety Toolkit?
- Is the OSHA 300 Log current and is the OSHA Form 300A signed and posted (Feb to Apr)? *
- Are written OSHA programs such as Lockout/Tagout, Hazard Communication, Asbestos Operations and Maintenance, available for review?*
- Is OSHA Poster 2293, *Job Safety and Health Protection*, or OSHA Poster 3165, *You Have a Right to a Safe and Healthful Workplace*, posted?*

*Indicates a critical OSHA compliance item.

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Executives' and Managers' Safety and Health Program and Compliance Guide

Handbook EL-802

August 2024

- A. **Explanation.** This is a complete revision of Handbook EL-802. It addresses changes in the organization, including updated technology, reference resources, and program compliance in the Safety and Health Management Tool (SHMT).
- B. **Availability.** This handbook is available online on the Postal Service™ "PolicyNet" page at <https://blue.usps.gov/cpim/hbkid.htm>.
- C. **Comments.** Address comments or questions regarding the content of this handbook to:
OCCUPATIONAL SAFETY AND HEALTH (OSH)
U.S. POSTAL SERVICE
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WASHINGTON DC 20260
- D. **Effective Date.** This publication is effective on the date that this edition posts online.

*Linda DeCarlo
Senior Director,
Occupational Safety and Health*

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1 Introduction

1-1 Purpose

The Postal Service focuses on engaging in innovative safety efforts to reduce the number of, and prevent, employee workplace accidents and injuries. The purpose of this handbook is to help Postal Service™ nonbargaining employees:

- Understand their roles in the Postal Service commitment to safety as a smart business practice.
- Get involved in promoting safety programs, and to recognize and correct unsafe acts, working conditions and practices.
- Ensure accountability for effective programs in all Postal Service facilities.

The handbook also includes information on management responsibilities under the Occupational Safety and Health (OSH) Act, and regarding Occupational Safety and Health Administration (OSHA®) inspections and citations.

1-2 Content Summary

Chapter 1 — Includes the purpose of this handbook, a summary of the handbook's content, and a list of references.

Chapter 2 — Provides an overview of Postal Service obligations under the OSH Act so that managers understand their legal and Postal Service responsibilities under the OSH Act.

Chapter 3 — Includes an overview of the Postal Service Safety and Health Program, including information on using the safety, environmental, and ergonomic resources in the Safety and Health Management Tool (SHMT) to manage Safety and Health programs.

Chapter 4 — Provides information on working with OSHA, including responding to employee complaints, handling OSHA inspections and citations, and managing citations.

Appendix — Postal Service Executives' Safety and Health Planner.

1-3 References

Key references used throughout this handbook include:

- *Employee and Labor Relations Manual* (ELM), Chapter 8, "Safety, Health and Environment" (<https://blue.usps.gov/cpim/manuals.htm>).
- Safety and Health Management Tool (SHMT).
- Postal Employees Safety Enhancement Act (Public Law 105–241) (<https://www.govinfo.gov/app/details/PLAW-105pub241>).
- Occupational Safety and Health Administration (OSHA) (<https://www.osha.gov/>).

Information on OSHA inspections and compliance activity, and employer rights and responsibilities following an OSHA inspection is available on the "OSHA® FactSheet: Occupational Safety and Health Administration (OSHA) Inspections" at <https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf>.

2 Regulatory Requirements and Postal Service Policy

2-1 Postal Employees Safety Enhancement Act

2-1.1 Change in Postal Service Status as Employer Under OSHA

In 1998, the Postal Employees Safety Enhancement Act (PESEA) changed the status of the Postal Service as an employer under the Occupational Safety and Health (OSH) Act of 1970. Previously, the Postal Service, as a federal agency, had been exempt from the private-sector provisions of the OSH Act.¹

2-1.2 PESEA Requirements and the OSH Act

When PESEA became effective, the Postal Service, like most private-sector employers in the United States, became fully subject to the OSH Act. This means that OSHA has jurisdiction over the Postal Service in matters relating to employee safety and health. The Postal Service must comply with the OSH Act and OSHA standards and regulations. If violations occur, the Postal Service may be cited, fined, and, in extreme cases, referred for criminal prosecution by OSHA.

PESEA also does the following:

- Amends federal law to prohibit the Postal Service from:
 - Considering compliance with OSHA in determining whether to close or consolidate a Post Office®; or
 - Restricting, eliminating, or adversely affecting any service it provides because of paying a penalty imposed under OSHA.
- Prohibits the Postal Regulatory Commission from considering compliance with OSHA in determining whether to increase rates, and provides that OSHA compliance must not otherwise affect the service of the Postal Service.

1. Federal agencies are covered under Section 19 of the OSH Act and Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*, February 26, 1980.

2-2 Postal Service Policy

The Postal Service complies with OSHA requirements described in 2-1. The Postal Service is committed to:

- Developing and promoting safety programs.
- Recognizing and correcting unsafe acts, working conditions and practices.
- Ensuring accountability for effective programs in all Postal Service facilities.
- Promoting safety as part of smart business practices.

See the *Employee and Labor Relations Manual* (ELM).

3 Postal Service Safety and Health Program

3-1 Guidelines

The Postal Service has a Safety and Health program, which includes the following guidelines:

- A. *Management leadership and employee participation:*
 - Management commitment and employee involvement are complementary.
 - Management commitment provides the motivating force and the resources for organizing and controlling activities within an organization.
 - Employee involvement provides the means through which workers develop and express their commitment to safety and health protection.
- B. *Workplace analysis (surveys and job hazard analysis, inspections and hazard controls, and employee hazard reporting):*
 - Workplace analysis involves a variety of worksite examinations to identify not only existing hazards, but also the conditions and operations where changes may occur to create hazards.
 - Effective management actively analyzes the work and the workplace to anticipate and prevent harmful occurrences.
- C. *Accident reporting, investigation, and analysis:*
 - Reporting and investigating accidents and near-miss incidents and analyzing their causes helps determine a means for preventing them.
 - Analyzing injury and illness trends over time helps identify common causes and develop preventive measures.
- D. *Hazard prevention and control:*
 - This activity is triggered by a determination that a hazard or potential hazard exists.
 - Where elimination is feasible, hazards are prevented by effectively designing job tasks and/or the job site.
 - Where elimination is not feasible, hazards are controlled to prevent unsafe conditions and unhealthful exposure.

- Elimination or control is accomplished in a timely manner.
- E. *Emergency response:*
Effective emergency response includes written emergency action plans, training, fire inspections, and first aid.
- F. *Safety and health training:*
- Effective safety and health training addresses the safety and health responsibilities of all personnel, whether salaried or hourly.
 - Safety and health training is most effective when incorporated into other training about performance requirements and job practices.
 - The complexity of training depends on the size and complexity of the workplace and nature of hazards.
 - Effective safety and health training ensures that all employees understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards.
 - Such training ensures that supervisors carry out their safety and health responsibilities, including:
 - Analyzing the work under their supervision to identify unrecognized potential hazards;
 - Maintaining physical protection in work areas;
 - Reinforcing employee training through continual performance feedback; and
 - Enforcing safe work practices.
- G. *Motor vehicle safety and driver training:*
- Effective motor vehicle safety and driver training ensures proper driver selection, training, and supervision, in accordance with Handbook EL-804, *Safe Driver Program*.
 - Such training ensures compliance with U.S. Department of Transportation regulations.

3-2 Postal Service Program

3-2.1 Requirements

Managers must demonstrate a commitment to providing safe and healthful working conditions in all Postal Service owned and leased installations, along with being involved in day-to-day safety performance. They must be held accountable for safety performance and compliance with OSHA standards and regulations.

In facilities that do not have a full-time safety professional assigned, installation heads must designate an Executive and Administrative Schedule (EAS) employee as facility safety coordinator (FSC).

3-2.2 Program Elements

The Postal Service program elements include management commitment, involvement, and accountability.

3-3 Management Commitment, Involvement, and Accountability

3-3.1 How to Demonstrate Commitment

Key steps for demonstrating commitment include the following:

- **Develop a written policy statement.**

Executives and managers at all levels should ensure that a current written safety policy statement is in effect. This policy should stress that safety is a line-management responsibility supported by Postal Service Safety and Health Program professionals and senior management officials.

- **Establish personal communications.**

Executives and managers should:

- Periodically send to targeted audiences memorandums, articles, etc., highlighting major safety initiatives, success stories, exceptional safety performance, and other safety-related activities.
- Stress commitment, involvement, and accountability to managers and supervisors.
- Publicize information on OSHA compliance activities and the Postal Service Safety and Health Program.

- **Consider funding needs.**

During annual budget reviews, consideration must be given to adequate local funding for the Postal Service Safety and Health Program, as noted in ELM section 818, "Safety and Health Program Budgeting."

- **Establish Executive Safety and Health committees.**

ELM section 815, "Executive and Management Safety and Health Committees," requires executives and managers to establish these committees at all levels. Executives must ensure that the committees meet at least quarterly to address safety program issues, as required by standards in the ELM.

- **Attend Joint Labor-Management Safety and Health Committee meetings.**

Executives and managers should attend meetings of the Joint Labor-Management Safety and Health Committee, and do the following:

- Discuss the Postal Service Safety and Health Program and their personal commitment to safety in the workplace and to the program.

- Discuss the committee's function and responsibility, and their expectations of and support for the committee.
- Review local initiatives.
- Review successes and failures.
- Ask about the agenda, minutes, and recurring items.
- Review employee complaints and PS Forms 1767, *Report of Hazard, Unsafe Condition or Practice*, submitted by employees, and entered into SHMT.
- Review accident data and accident-reduction plan performance as compared to established accident-reduction targets in SHMT and on the Safety Dashboard.
- Ensure that committee members receive appropriate training.
- **Encourage employee participation.**
Executives and managers should encourage and be involved in national and local employee participation programs. Refer to SHMT for the latest information on facility efforts.

3-3.2 How to Demonstrate Involvement

3-3.2.1 Conduct Safety-Specific Executive and Management Field Visits

Field visits present excellent opportunities for executives and managers to demonstrate their commitment and direct support for doing business safely. Executives and managers should focus visits solely on demonstrating commitment and involvement in the safety process. Suggested activities for these visits include:

- **Talk with employees and supervisors.**
 - Discuss local accident experience and employee concerns over safety hazards.
 - Review procedures for reporting hazards and defective equipment.
 - Talk with Joint Labor-Management Safety and Health Committee members.
 - Ask for success stories to share with others.
- **Meet with safety professionals and other supporting employees.**
 - Discuss support for safety and solicit comments on the local program's effectiveness.
 - Review interaction between Postal Service Safety and Health Program and Occupational Health Claims (OHC) functions.
- **Attend safety and health-related awards ceremonies.**
Opportunities include:
 - National Safety Council's Safe Driver annual pin recognition, and Kaplan and Million Mile awards.
 - Safety Leadership and Vision Award.
 - Local ceremonies that acknowledge excellent safety performance.

- **Visit employee orientation, craft safety training, and initial-level supervisor, associate, or supervisor refresher training.**

These activities provide excellent opportunities to discuss:

- How safety is smart business.
- The Postal Service Safety and Health Program and processes.
- Line-management responsibility and accountability.
- Employee rights and responsibilities.

3-3.2.2 **Inspect and Observe**

Managers at all levels must periodically check for unsafe acts, conditions, and work practices.

3-3.3 **How to Demonstrate Accountability**

3-3.3.1 **National Performance Assessment**

The National Performance Assessment (NPA) provides scorecards that may be used to *monitor performance* of the entire enterprise across the nation. The scorecards include safety-performance criteria, such as OSHA Injury and Illness rates, the Total Accident Rate, and OHC initiatives.

3-3.3.2 **Pay for Performance**

The Pay for Performance (PFP) program emphasizes the organization's success through objective *measurable performance indicators* that are aligned at the corporate level, and include Safety and OHC indicators. Headquarters establishes Postal Service Safety and Health Program and OHC indicators and targets. By implementing effective program management and accident-reduction programs, executives and managers can achieve these targets.

Note: Executives' and managers' performance in this program is measured based on Postal Service Safety and Health Program performance.

3-3.4 **Resources**

See SHMT and the OSH Scorecard.

3-4 **Accident-Reduction Plans**

Accident-reduction plans target specific Postal Service Safety and Health Program indicators (such as slips, trips, and falls) with specific actions and tasks to reduce the number of accidents. Each year accident-reduction plans that target specific Safety and Health Program indicators must be implemented and tracked in SHMT.

3-5 Inspections, Improvement Plans, and Written OSHA Compliance Programs

The following includes benefits of safety inspections, safety-improvement plans, and OSHA safety-compliance programs, and information on templates available for OSHA safety programs:

- Inspections identify hazards.
- Improvement plans identify procedures to abate hazards.
- Templates for OSHA-required written programs ensure compliance with specific OSHA standards. Templates are available for programs, such as hazard communication, personal protective equipment, and confined-space safety. Templates are also available on the following safety topics:
 - Asbestos.
 - Bloodborne pathogens.
 - Electrical work plan
 - Hazardous material.
 - Hearing conservation.
 - Lead.
 - Respiratory protection.

3-6 Engagement of Postal Service Unions and Employees

Effective engagement promotes employee involvement and includes agreements with unions on specific Postal Service Safety and Health Program initiatives. (See Article 14 of labor-contract agreements between the Postal Service and national unions.) Examples of effective engagement:

- Promoting active participation in practicing safety and ergonomics in the workplace.
- Providing methods for employee feedback on ideas to improve safety.
- Showing to employees the Postal Service Safety and Health Program video series, "Safety Depends on Me," which enables communication with employees on safety and fosters motivation for using safe practices.

3-7 Safe Driver Program

The Safe Driver Program focuses on preventing motor vehicle accidents by providing detailed guidance on how to select and train individuals who will drive vehicles for the Postal Service as part of their job responsibilities. The program also provides guidance on refresher training for Postal Service drivers. For further information, see Handbook EL-804, *Safe Driver Program*.

3-8 Safety and Health Management Tool (SHMT)

3-8.1 Purpose

The Safety and Health Management Tool (SHMT) is designed to be used by all levels of the organization, providing managers and employees with access to information about Postal Service Safety and Health Program inspections, accident and hazard reporting, and tools to track safety-program progress.

3-8.2 Content

SHMT provides Postal Service employees with a wealth of safety, health, environmental, and ergonomics information.

The SHMT library contains accident-reduction information. This site also provides the following resources, including but not limited to:

- Guidance and tools for managing accident-reduction plans and goals.
- Best practices and countermeasures.
- Tools for data management and accident analysis.
- National Job Safety Analyses (JSAs) for many tasks for local adaptation.
- Safety inspection checklists.
- Written program guides and templates for 10 OSHA standards.
- Guidance and references for safety and health topics, such as:
 - Developing Emergency Action Plans (EAPs).
 - Reporting on motor vehicle and industrial accidents.
 - Giving safety talks (including sample safety talks on many topics).
- Links to Postal Service safety references (manuals, handbooks, management instructions, etc.).

3-8.3 Access

To access SHMT:

- Go to Blue at <https://blue.usps.gov>.
- Click on [MyHR](#) on the bar at the top of the page or *Featured Topics* at left on the page.
- Under [MyHR](#) click on “Safety & Labor” and then “Safety Tools for Managers.”
- Under *Featured Topics*, click on “Front Line Supervisor’s Toolkit, and then the tab “Apps/Tools.” Under “Apps/Tools” click on “SHMT.”

Contact the local Safety office or OHC for additional assistance.

4 Working With OSHA

4-1 Investigating Employee Safety and Health Complaints

4-1.1 Complaints and Inspections

4-1.1.1 Employee Complaints to OSHA

Many investigations and inspections result from employee complaints. The most effective method to reduce the number of employee complaints to OSHA is to ensure that:

- PS Forms 1767, *Report of Hazard, Unsafe Condition or Practice*, submitted by employees, or entered into SHMT, are handled expeditiously.
- Hazards are abated in accordance with Postal Service policy and documented in accordance with requirements in the ELM.

4-1.1.2 Handling Complaints Internally

If, for whatever reason, an employee or employee representative still complains to OSHA, there still may be an opportunity to address the complaint internally, as follows:

- OSHA procedures allow for contacting the employer to:
 - Advise management of the complaint; and
 - Request an investigation and correction of hazards by the employer.
- Managers may avoid an unnecessary inspection by:
 - Responding within 5 working days and correcting any hazards;
 - Posting the information that the complaint has been addressed and any hazard corrected; and
 - Notifying employees of any hazard and that it has been corrected.
- Managers may also request additional time and dispute complaints with detailed evidence of the conditions. OSHA shares the information obtained from management with the complainants.
- OSHA has wide discretion to forego an inspection if OSHA personnel believe the hazard:
 - Does not exist; or
 - Has been abated.

4-1.1.3 NIOSH Health Hazard Evaluations

Based on employee complaints, the National Institute for Occupational Safety and Health (NIOSH) may indicate the intent to conduct a Health Hazard Evaluation (HHE). A manager who receives a written or telephone notification that NIOSH intends to conduct an HHE must immediately contact area Senior Field Safety and Health specialists. Managers must not refuse an investigation or deny NIOSH entry onto the premises. However, they may request time to coordinate with Senior Field Safety and Health. A manager must not initiate a request to NIOSH for an HHE without consulting Senior Field Safety and Health.

4-1.2 Steps to Take

Managers should take the following steps to ensure that employee safety complaints are handled expeditiously:

- Ensure that PS Forms 1767 submitted or entered into SHMT by employees are properly tracked and responded to in accordance with ELM section 824.6, "Investigating Employee Reports of Hazard, Unsafe Condition, or Practice."
- Hold supervisors responsible for responding timely to submitted PS Forms 1767.
- Place the highest priority on responding to requests by OSHA for investigation of employee complaints, as follows:
 - Upon receipt of such a request, notify the installation head and the supporting Safety office.
 - Make sure the response to OSHA is signed by the installation head and transmitted on time (within 5 working days).
- Notify Senior Field Safety and Health if NIOSH communicates the intent to conduct an HHE.

4-2 OSHA Inspections and Citation Management — Postal Service Responsibilities

4-2.1 Executives and Managers

Executives and managers must do the following:

- Achieve compliance with OSHA standards as part of their overall safety and health responsibilities.
- Lead the OSHA compliance effort.
- Review and be familiar with ELM section 825, "OSHA Inspections." (The ELM is available at <https://blue.usps.gov/cpim/manuals.htm>.)
- Review OSHA guidance on conducting inspections, information on employer rights and responsibilities, and other safety and health information available at <https://www.osha.gov>.

4-2.2 Installation Heads

Installation heads must do the following:

- Achieve compliance with OSHA standards within the facilities under their control.
- Review and be familiar with ELM section 825, "OSHA Inspections." (The ELM is available at <https://blue.usps.gov/cpim/manuals.htm>.)
- Review OSHA guidance on conducting inspections, information on employer rights and responsibilities, and other safety and health information available at <https://www.osha.gov>.

Information on OSHA inspections and compliance activity, and employer rights and responsibilities following an OSHA inspection is available on the "OSHA® FactSheet: Occupational Safety and Health Administration (OSHA) Inspections" at <https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf>.

4-2.3 Occupational Safety and Health (OSH)

OSH Headquarters:

- Oversees the citation management process for Headquarters.
- Coordinates with the General Counsel and affected Headquarters organizations responses to citations for violations.
- Oversees quality control of citation information entered in the OSHA Citation Management in SHMT.
- Resolves discrepancies in the information with the responsible safety specialist.
- Analyzes citation information.
- Reports the results of the analysis to key Postal Service personnel.
- Identifies national opportunities to prevent further citations and improve safety and health programs based on the analysis of citation data.
- Assists on-site to resolve citation issues as required.

4-2.4 General Counsel

The Postal Service General Counsel's centralized OSHA unit:

- Oversees legal aspects of the citation management process nationally, at Headquarters and in the field.
- Is responsible for approving citation-related correspondence to be sent to OSHA.
- Prepares all protective notices and notices of contest and mails them to OSHA.
- Prepares and distributes additional correspondence to OSHA for selected citations as determined citation by citation.
- Provides consultative assistance to Occupational Safety and Health field staff and Senior Field Safety and Health personnel.
- Helps Occupational Safety and Health field staff and Senior Field Safety and Health personnel resolve citation issues.
- Oversees and handles all required litigation with the Occupational Safety and Health Review Commission and federal courts.

4-2.5 **Maintenance Policy and Programs, Engineering**

Maintenance Policy and Programs, Engineering, Headquarters:

- Helps implement programs to abate systemic maintenance-related hazards.
- Distributes OSHA citation information to appropriate personnel.

4-2.6 **Maintenance Operations (Area)**

Managers of Maintenance Operations (Area):

- Oversee abatement of hazards resulting in violations in their area of responsibility.
- Support district and plant managers in abating hazards.
- Help implement programs to abate systemic maintenance-related hazards.

4-2.7 **Facilities Service Offices**

Personnel in Facilities Service offices confirm that processes are in place to ensure prioritizing projects based on OSHA citations and abatement schedules.

4-2.8 **Safety Specialists**

Field safety specialists, assigned by managers of Safety and Health within each field office enter OSHA inspection and citation data into SHMT. To perform this task, they must:

- Enter citation information for facilities in their area of responsibility (including Headquarters field units) as soon as they are received, but no later than by close of business (COB) on the day the citation is received from OSHA.
- Fax or email copies of the citation to OSH, the General Counsel at Headquarters, and Senior Field Safety and Health, preceding the faxes or emails with a telephone call.
- Keep the citation information current and accurate as hazards are abated and citation management activities progress. Enter this information as soon as these activities are accomplished, but no later than COB that day.
- Enter abatement actions as soon as they are accomplished, but no later than COB that day.
- Keep informed Senior Field Safety and Health and the responsible manager.
- Facilitate abatement actions with responsible managers.
- Before transmittal, coordinate all citation-related correspondence to OSHA with OSH, the General Counsel at Headquarters, managing counsels, field offices, and Senior Field Safety and Health.

4-2.9 **Senior Field Safety and Health**

Senior Field Safety and Health personnel will oversee the citation management process within their areas. Senior Field Safety and Health personnel:

- Identify facilities, program areas, and procedures within their areas that require improvement, and notify management.
- Support implementation of nationally targeted efforts to improve program areas and procedures.

- Before transmittal, coordinate all citation-related correspondence to OSHA with OSH, the General Counsel at Headquarters, and with their area Legal Department staff representative.

4-3 OSHA Citation Management in SHMT

4-3.1 About SHMT

The Safety and Health Management Tool (SHMT) is a real-time application that safety specialists use to record OSHA inspection and citation information. Once safety specialists digitally enter key information from OSHA citations, the information is made electronically available in a series of views, reports, and charts. SHMT users with authorized access may view the data or print the presentation-quality reports and charts. The views, reports, and charts present the inspection information in logical, easy-to-understand formats that simplify analyzing the data.

The benefit of using SHMT is to provide quick and reliable access to OSHA inspection information so that managers:

- Address citation settlement promptly.
- Ensure prompt abatement of hazards.
- See the types of citations their facilities or like facilities receive and take appropriate preventive or corrective action at their facilities.
- May identify trends in the OSHA citations and develop action plans to prevent similar citations at like facilities.

SHMT also allows the Postal Service to maintain an accurate electronic record of OSHA citations.

4-3.2 Access

The opening inspection screen shows the main view of the citation data, year to date, and provides:

- A list of inspections by area and access to the full text of each inspection report.
- Access to data-entry forms for new citations by:
 - Clicking the "Audit" tab at left on the home page;
 - Then clicking "Inspection Management," and then
 - Clicking on "Inspections."

To locate the applicable OSHA inspection, use the search option to view details of each violation associated with the citation. To review entries, select report tabs located at the bottom of the page.

For help, contact Senior Field Safety or local Field Safety.

Appendix

Postal Service Executives' and Managers' Safety and Health Planner

Demonstrate Safety Principles	Activity	Yes	No	Comments/Required Actions
Personal Commitment	Post the current policy statement.			
	Send memos to targeted employee groups.			
	Prepare articles on safety issues.			
	Review the budget for safety issues.			
	Review accident data (SHMT and the Safety Dashboard).			
	Establish accident-reduction plans.			
	Establish an Executive Safety and Health (S&H) Committee.			
	Attend Executive S&H Committee meetings (quarterly).			
	Attend Joint Labor-Management S&H Committee meetings.			
Involvement in Safety	Conduct field visits.			
	Meet with the craft supervisor.			
	Meet with safety staff.			
	Attend ceremonies (e.g., Safety and Safe Driver awards).			
	Visit orientation and training sessions.			

Demonstrate Safety Principles	Activity	Yes	No	Comments/Required Actions
Facility Conditions	Inspect and observe:			
	<ul style="list-style-type: none"> ▪ Facilities – clear aisles and passageways, exits, etc. 			
	<ul style="list-style-type: none"> ▪ Vehicles – vehicles off street and chocked, if applicable; vehicles in good condition. 			
	<ul style="list-style-type: none"> ▪ Driving – driver's license checked. 			
	<ul style="list-style-type: none"> ▪ Work practices and behaviors. 			
	Check paperwork and records.			
Accountability	Review:			
	<ul style="list-style-type: none"> ▪ Inspection and action plans (in SHMT). 			
	<ul style="list-style-type: none"> ▪ OSHA citations and abatements (in SHMT). 			
	<ul style="list-style-type: none"> ▪ Accident-reduction target progress (Safety Dashboard). 			
	Ensure that personnel evaluations include safety performance.			
	OSHA 300a posted Feb 1 – April 30).			
Ensure that 5 years of OSHA records are available for review.				
Review any past OSHA inquiries to ensure that the facility complies with OSHA requirements.				