

Department of Veterans Affairs	VA DIRECTIVE 7700
Washington, DC 20420	Transmittal Sheet
	July 8, 1998

OCCUPATIONAL SAFETY AND HEALTH

1. **REASON FOR ISSUE:** To revise Department of Veterans Affairs (VA) occupational safety and health policy, formerly contained in VA Manual MP-3, VA Engineering, Part III, Safety, Occupational Health, and Fire Protection.
2. **SUMMARY OF CONTENTS/MAJOR CHANGES:** This directive sets forth the policies and responsibilities for managing and implementing the VA occupational safety and health program (OSH) and:
 - a. Identifies the responsibilities associated with the VA OSH program of Department officials and employees, including Veterans Health Administration and other VA organization officials.
 - b. References occupational safety and health standards, executive orders, VA directives and handbooks, and the Code of Federal Regulations as the primary sources for government-wide guidelines; and
 - c. Identifies that the funding for the initiatives, as described, will be paid from existing funds at those organizations required to establish comprehensive OSH programs.
3. **RESPONSIBLE OFFICE:** Office of Occupational Safety and Health (00S1) and Assistant Secretary for Human Resources and Administration (006)/Designated Agency Safety and Health Official (00S).
4. **RELATED HANDBOOKS:** VA Handbook 7700.1, Occupational Safety and Health Program and VA Handbook 7700.2, Medical Surveillance Programs.

5. RESCISSIONS

- a. This Directive replaces only occupational safety and health portions of MP-3, VA Engineering, Part III, Safety, Occupational Health, and Fire Protection. These are MP-3, Part III, Change 1 dated June 28, 1973; erratum to Change 5 dated March 6, 1974; Change 12, dated October 29, 1995; Change 14, dated September 6, 1976; Change 16, dated November 18, 1976; Change 18, October 12, 1997; Change 19, May 16, 1979; Change 20, dated June 22, 1981; and Change 24, dated July 7, 1988. This rescinds in their entirety:
 - (1) Chapters 1, 2, 3, and 5; and
 - (2) Appendices 1A, 2A, 2B, 2C, 2D, 3A, 5H, 5J, 5K, 5M, 5N, 5O, 5P, 5Q, 5R, and 5S.
- b. VA Circular 00-88-6, Management, Abatement, and Removal of Asbestos in VA Facilities dated February 9, 1988, and Supplement No. 5, dated January 1, 1993.

NOTE: MP-3, Part III, Chapter 4, Fire Prevention and Suppression, and appendixes 4A, 5A, 5B, 5C, 5D, 5E, 5F, 5G, 5I, and 5T will remain in effect until revised or rescinded.

CERTIFIED BY:	BY DIRECTION OF THE SECRETARY
	OF VETERANS AFFAIRS:
/s/	/s/
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Deputy Assistant Secretary for	Assistant Secretary for
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OCCUPATIONAL SAFETY AND HEALTH

1. PURPOSE

a. Establish Department of Veterans Affairs (VA) Occupational Safety and Health (OSH) program policy; and

b. Assign responsibility for compliance with requirements of Federal, Occupational Safety and Health Administration (OSHA), and VA standards and executive orders that define the VA OSH program.

2. POLICY

a. Maintain safe and healthful work environments for employees through the elimination of safety and health hazards and through the development of safe work practices;

b. Prohibit reprisals against employees who exercise their rights under the VA OSH program;

c. Review periodically the performance of the VA OSH program to ensure compliance with applicable codes, standards, and executive orders and ensure that all VA policy and objectives concerning safety and health are met;

d. Afford VA employees working at a non-VA facility protection equal to that required by the VA OSH program;

e. Implement all requirements specified herein in compliance with the terms of applicable collective bargaining agreements;

f. Integrate Joint Commission for Accreditation of Healthcare Organizations (JCAHO) requirements to efficiently and effectively address safety and health requirements at Veterans Health Administration (VHA) healthcare facilities; and

g. Fund OSH initiatives from existing funds of those organizations required to establish comprehensive OSH programs.

3. RESPONSIBILITIES. OSH responsibilities are addressed by various VA organizations. VA organizations responsible for implementing the VA OSH program will coordinate efforts to ensure that all OSH requirements are satisfied and that a safe and healthful workplace is provided.

a. The Secretary of Veterans Affairs

(1) Ensures that all VA employees are provided a safe and healthful work environment.

(2) Appoints the Designated Agency Safety and Health Official (DASHO) in accordance with Executive Order 12196, Occupational Safety and Health Programs for Federal Employees.

b. Human Resources and Administration (HR&A)

(1) Assistant Secretary for Human Resources and Administration

- (a) Serves as the Department's DASHO;
- (b) Assists the Secretary to formulate and promulgate VA OSH policy; and
- (c) Administers the VA OSH program.

(2) Deputy Assistant Secretary for Human Resources Management (HRM)

(a) Serves as liaison between recognized employee representatives and the DASHO for OSH issues raised at the national level;

(b) Ensures that training (e.g., new employee orientation, supervisory training, etc.) addresses OSH program elements, as appropriate;

(c) Assists the Chief Consultant for Occupational and Environmental Health and the Director, OSH, with the administration of the medical surveillance programs; and

(d) Develops procedures to handle reprisal complaints from employees who exercise their rights under the OSH program.

(3) Deputy Assistant Secretary for Administration

(a) Develops and implements a written OSH program for Central Office.

(b) Manages the VA OSH program, provides counsel and advice to VA management concerning OSH matters, and ensures that performance standards address OSH responsibilities.

(4) Director, Occupational Safety and Health (OSH)

(a) Develops VA OSH policy and procedures to ensure effective implementation of the VA OSH programs;

(b) Develops goals for reducing or eliminating occupational injuries and illnesses. Establishes priorities within the OSH program to ensure that appropriate corrective actions are developed and implemented. Analyzes Office of Workers' Compensation Programs (OWCP) data to identify areas where prevention initiatives may be warranted;

(c) Evaluates the effectiveness of the VA OSH program and the adequacy of funding for OSH initiatives at all operational levels. Prepares the VA's annual OSH Report as required by Department of Labor (DOL);

(d) Provides technical support to OSH officials, VA management officials, and VA OSH personnel;

(e) Identifies and updates OSH training needs for employees, supervisors, and managers and training plans for VA OSH personnel. Submits budget requests for the development and presentation of Department-wide OSH training initiatives. Provides support and consultation concerning OSH training. Coordinates education activities through the Strategic Health Group for Occupational and Environmental Health to the Office of Employee Education;

(f) Ensures that procedures are developed to handle reprisal complaints from employees who exercise their rights under the OSH program.

(g) Provides technical support concerning OSH issues to the DAS for the Office of Administration (O/A) and serves as the liaison between the DAS for O/A and VA organizations concerning Department-wide OSH issues identified by recognized national employee representatives;

(h) Serves as VA's liaison with DOL's Occupational Safety and Health Administration (OSHA) concerning Department-wide OSH issues;

(i) Ensures that all applicable OSH standards are addressed by the VA medical surveillance program;

(j) Evaluates and resolves, as appropriate, employee suggestions and complaints related to safety and health;

(k) Manages the OWCP/OSH Management Information System (WC/Safety Tracker System) which provides data for monitoring OSH performance and establishes OSH priorities; and

(l) Administers VA's OSH awards and motor vehicle safety programs.

c. Veterans Health Administration (VHA)

(1) Under Secretary for Health

(a) Ensures that VHA employees are provided a safe and healthful work environment by developing policy and programs within VHA to address all safety and health hazards;

(b) Ensures that VHA facilities provide OSH-related support and assistance to all local VA facilities;

(c) Ensures VA project designs and specifications comply with applicable OSH requirements;

(d) Ensures that staffing and funding are adequate to implement the VHA OSH program and those portions of the VA OSH program for which VHA has been assigned Department-wide responsibilities; and

(e) Recognizes significant contributions to the VHA OSH program through special awards.

(2) **Chief Network Officer**

(a) Assists the Under Secretary for Health to formulate and promulgate VHA OSH policy and programs to ensure that employees, patients, and visitors within VHA have a safe and healthful environment;

(b) Serves as VHA's OSH Official and manages the VHA OSH program ensuring that VA and VHA OSH programs are implemented consistently throughout VHA;

(c) Establishes Department-wide fire protection policy and programs that ensure structural fire safety for all VA-owned or -leased facilities; and

(d) Serves as the liaison between the DASHO and VHA facilities concerning OSH issues.

(3) **Network Directors**

(a) Ensure that employees in the VHA Network are provided a safe and healthful work environment;

(b) Ensure that staffing and funding are adequate to implement requirements of VA and VHA OSH programs within the VHA Network;

(c) Develop plans to achieve OSH goals established by the Secretary.

(d) Provide OSH support and assistance to all VA facilities, e.g., Veterans Benefits Administration and National Cemetery System, located in the VHA Network. Administer the VHA OSH program within the Network so that it complies with all requirements of VA and VHA OSH programs;

(e) Recognize significant contributions to the OSH program within the VHA Network through special awards;

(f) Review and approve Asbestos Management Plans and OSH Abatement Plans for VHA facilities within the network;

(g) Manage non-recurring maintenance and repair, minor, minor-miscellaneous, and delegated major construction projects under his/her jurisdiction, so that all safety and health requirements are satisfied;

(h) Appoint an OSH professional to serve on Boards of Inquiry (see VA Handbook 7700.1, par. 6f); and

(i) Ensure that qualified personnel (e.g., Safety Managers, Fire Protection Engineers, Industrial Hygienists):

1. Conduct preoccupancy inspections and annual OSH inspections of VA facilities;

2. Review and comment on OSH and fire protection aspects of plans and specifications for non-recurring maintenance and repair, minor, minor-miscellaneous, and delegated major construction projects; and station level construction projects;

3. Provide support and guidance for OSH training for program personnel assigned to VA facilities;

4. Provide support and guidance to VA facilities for OSH and fire protection;

5. Review and recommend action concerning facility OSH abatement plans;

6. Perform and document follow-up reviews to determine if previously identified deficiencies have been corrected or interim corrective actions have been implemented;

7. Evaluate and resolve, as appropriate, employee suggestions and complaints related to safety and health;

8. Provide support and guidance concerning the development and implementation of the Fire Plan (see VA Handbook 7700.1, par. 6j);

9. Provide support and guidance to VHA healthcare facilities for OSH and fire protection issues related to JCAHO accreditation;

10. Assist in the development and implementation of programs to reduce occupational injury and illness rates and OWCP costs;

11. Determine that new or existing engineering controls at individual facilities have been validated appropriately. (This may be completed as part of the annual OSH inspection); and

12. Provide support and guidance concerning OSH regulations for the infection control and radiation safety programs, as appropriate.

(4) Chief, Facilities Management Officer

(a) Ensures that construction designs and specifications for projects under their jurisdiction address safety and health requirements;

(b) Provides designs and specifications for projects under their jurisdiction to appropriate OSH personnel for review and comment. Reviews and provides written responses concerning the comments resulting from the safety and health review;

(c) Provides facility authorities copies of contract submittals related to safety and health, including a list of hazardous materials to be used by the contractors/subcontractors (prior to delivery of the materials to the facility);

(d) Ensures that contractors/subcontractors at construction projects under the jurisdiction of the Office of Facilities Management comply with applicable OSHA and VA safety and health requirements, so that the safety and health of VA beneficiaries, visitors, or employees are not adversely affected;

(e) Develops and updates VA construction standards, specifications (or portions thereof), construction details, design guides, and other design and construction documents related to safety and health to ensure compliance with the latest edition of applicable laws, codes, and standards;

(f) Notifies appropriate OSH personnel of newly constructed or remodeled space and works with construction contractors to correct deficiencies identified by the preoccupancy inspection performed by OSH personnel; and

(g) Informs contractors/subcontractors under the jurisdiction of the Office of Facilities Management of hazards they may encounter in VA work environments.

(5) **Chief Consultant for Occupational and Environmental Health (CCOEH)**

(a) The CCOEH implements and manages VA's medical surveillance program. (See VA Handbook 7700.1, par. 7b(2) and VA Handbook 7700.2, Medical Surveillance Programs;)

(b) Assists and advises the Chief Network Officer on formulation and promulgation of VHA OSH and environmental policies and programs; and

(c) Chairs the Occupational and Environmental Health Strategic Health Group.

(6) **The Office of Employee Education (OEE).** OEE develops and presents OSH training (as resources allow) for VA personnel through the OEE continuing education network.

(7) **Engineering/Safety Cluster Coordinator**

(a) Develops and presents OSH training (as resources allow) for VA personnel; and

(b) Ensures that requests for OSH training are coordinated with the Chief Consultant for Occupational and Environmental Health, so that VA (VHA and non-VHA) OSH training needs are addressed.

d. **Other Administration Heads, Assistant Secretaries, and Other Key Officials.** Other VA organizations (see pars. d.(2)(a)-(i)) are responsible for separate facilities/programs and shall develop and implement a written OSH program for those facilities/programs.

(1) **General Responsibilities**

(a) Ensure that employees assigned to their organization are provided a safe and healthful work environment;

(b) Ensure that staffing and funding are adequate to implement the organization's OSH program, so that it complies with requirements of the VA OSH program;

(c) Designate an OSH Official for the organization (see par. f below for specific responsibilities of OSH Officials);

(d) Recognize significant contributions to the OSH program within the organization through special awards; and

(e) Develop policies and programs within their respective organizations to address all safety and health hazards (e.g., beneficiary and visitor safety, OSH).

NOTE: VA officials whose facilities are located in leased space (including GSA-owned space) must ensure that their facilities OSH program complies with the requirements of VA Handbook 7700.1. This may required negotiation with and concurrence by building owners or local GSA officials.

(2) **Specific Responsibilities**

(a) **Assistant Secretary for Information and Technology.** The Office of the Assistant Secretary for Information and Technology is responsible for development and implementation of a written OSH program for and the Austin Automation Center. These responsibilities have been re-delegated to the Director, Austin Automation Center. The Director, Austin Automation Center maintains the OWCP/OSH Management Information System (WC/Safety Tracker System) software and databases and coordinates any OSH-related changes or updates with the Director, OSH.

(b) **Assistant Secretary for Management.** The Office of the Assistant Secretary for Management is responsible for development and implementation of a written OSH program. These responsibilities have been re-delegated to the Director of the Austin Finance Center and to the Deputy Assistant Secretary for Acquisition and Materiel Management. The Office of Acquisition and Materiel Management is responsible for development and implementation of a written OSH program for the Service and Distribution Center in Hines, the Denver Distribution Center, the Sommerville Asset Management Service, and the National Acquisition Center. In addition:

1. Serves as Director of Environmental Affairs;
2. Establishes Department-wide environmental policy and programs;
3. Maintains the VA product safety program. (See VA Handbook 7700.1, par. 6h and VA Handbook 7128, Storage and Distribution);
4. Establishes procedures requiring vendors (including GSA) to provide material safety data sheets (MSDSs) upon delivery of hazardous materials to VA depots and facilities; and
5. Coordinates product safety training with the Director, OSH.

(c) **Veterans Benefits Administration (VBA).** The Under Secretary for Benefits is responsible for developing and implementing a written OSH program for VBA facilities including the Regional Offices and Benefits Delivery Centers.

(d) **National Cemetery System (NCS)**

1. The Director, National Cemetery System, is responsible for developing and implementing a written OSH program for their cemeteries and area offices; and

2. The Chief, Architectural and Engineer Division, of NCS is responsible for reviewing construction designs and specifications for projects under the jurisdiction of the National Cemetery System to ensure that safety and health requirements are addressed.

(e) **The General Counsel (GC).** The GC provides legal assistance to the DASHO, as necessary, for the conduct of the VA OSH program.

(f) **Facility Directors.** See VA Handbook 7700.1, par. 4, for responsibilities.

(g) **OSH Officials**

(1) Assist key officials to formulate and promulgate the organization's OSH policy and programs;

(2) Manage the organization's OSH program;

(3) Provide counsel and advice to management concerning OSH matters;

(4) Evaluate and resolve, as appropriate, employee suggestions and complaints related to safety and health;

(5) Ensure that VA's and the organization's OSH programs are consistently implemented throughout the organization;

(6) Review and approve asbestos management plans and OSH abatement plans for the organization's facilities; and

(7) Serve as the liaison between the DASHO and the organization concerning OSH issues.

(h) **Service Chiefs and Supervisors**

(1) Enforce VA OSH rules, regulations, and standards within their area of responsibility;

(2) Identify unsafe and unhealthful conditions and practices in the workplace and taking prompt corrective action;

(3) Encourage employee suggestions on how to improve OSH;

(4) Notify facility safety and/or health personnel of work-related injuries and illnesses;

(5) Investigate injuries and illnesses that occur to employees under their supervision, documenting this investigation on VA Form 2162, Supervisor's Injury and Illness Investigation Report, or another appropriate form, and instituting or recommending corrective actions intended to preclude recurrence of similar injuries or illnesses;

(6) Ensure that employees under their supervision receive prompt and appropriate medical attention in the event of an injury or illness;

(7) Complete compensation and accident investigation forms;

(8) Instruct employees under their supervision in safe work practices (including the use of personal protective equipment) and corrects employees that do not follow safe work practices;

(9) Initiate disciplinary action, as appropriate, against employees who repeatedly violate safe work practices and procedures;

(10) Ensure that employees under their supervision are trained to perform their work safely, that they are aware of the hazards, if any, involved in their normal work functions, and that such training is properly documented;

(11) Develop and implement service and/or job specific OSH policies and procedures;

(12) Obtain MSDSs for hazardous chemicals used by employees under their supervision or stored in an area for which they are responsible; and

(13) Ensure that appropriate medical surveillance is offered.

(i) **VA Employees must:**

(1) Follow safe work procedures, including use of required personal protective equipment;

(2) Recognize unsafe and unhealthful conditions and take prompt corrective action within their authority;

(3) Report unsafe conditions or practices and work-related injuries or illnesses to supervisory personnel;

(4) Become knowledgeable of specific OSH requirements for and attend OSH training related to assigned tasks;

(5) Comply with VA medical surveillance program requirements (keeping scheduled appointments, etc.);

(6) Complete compensation and accident reporting forms;

(7) Wear a safety belt and shoulder harness, when available, while traveling in a vehicle on official business; and

(8) Become familiar with hazards that may be present and follow appropriate safe work practices when on travel or assigned to non-VA facilities.

4. REFERENCES

a. Americans With Disabilities Act (Public Law 101-336);

b. Executive Order (E.O.) 12196, Occupational Safety and Health Programs for Federal Employees;

c. E.O. 13043, Increasing Safety Belt Use in the United States;

d. OSHA Publication 2014, Recordkeeping and Reporting Guidelines for Federal Agencies;

e. Section 19 of the Occupational Safety and Health Act of 1970 (OSH Act) (Public Law 91-596);

f. Title 29, Code of Federal Regulations (CFR), Part 1960, Basic Program Elements for Federal Employee OSH Programs and Related Matters;

g. VA Directive 0320, Emergency Preparedness Planning;

h. VA Handbook 0320.1, Emergency Preparedness Planning;

i. VHA Directive 0320, Emergency Medical Preparedness; and

j. VHA Handbook 0320.1, Department of Veterans Affairs and Department of Defense Contingency Hospital System Plan.