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From: Naval Inspector General
To: Chief of Naval Operations (09FB)

Subj: ANNUAL FISCAL YEAR (FY) 2006 NAVAL INSPECTOR GENERAL
SAFETY AND OCCUPATIONAL HEALTH (SOH) OVERSIGHT INSPECTION
REPORT

Ref: (a) OPNAVINST 5100.23G


Encl: (1) Annual Fiscal Year (FY) 2006 SOH Oversight Inspection Summary Report

1. As required by reference (a), a summary of SOH oversight inspection results for FY 2006 is provided as enclosure (1).

2. During FY 2006, we conducted nine SOH Activity Oversight Inspections, five Area Visits (Southwest Asia, Diego Garcia, Marianas, Northwest, and Mid-South), and two Command Assessments (Bureau of Naval Personnel and U.S. Naval Academy). The first two activity inspections focused primarily on evaluating the implementation of the Chief of Naval Operations' mandated Process Review and Measurement System (PR&MS) methodology. For the remainder of the Oversight Inspections, the reviews were broadened to look at the overall Safety and Occupation Health Programs in the Commands and Areas visited. One of the goals during the past year was to identify systemic and policy issues that conflict and/or hinder an activity's ability to provide a safe and healthful work place.

3. Two findings were identified that are consistent with previous PR&MS findings: activities failed to fully utilize the full range of hazard data when performing hazard analyses, and they failed to incorporate critical elements that assign safety responsibilities and accountability that meet the criteria of the model. During the second half of the fiscal year, several opportunities for higher echelons to improve support to their inspected activities were identified and addressed. With very few exceptions, outside support (e.g., Industrial Hygiene, Occupational Medicine, Human Resources) to the inspected activities at the local level was good.

4. My points of contact for SOH Oversight Inspections are CAPT Roger Natsuhara at DSN 288-6648, (202) 433-6648, roger.natsuhara@navy.mil and CDR Warren Jederberg at DSN 288-6644, (202) 433-6644, warren.jederberg@navy.mil.


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Annual Fiscal Year 2006 Safety and Occupational Health (SOH) Oversight Inspection Report

Nine Safety and Occupation Health (SOH) Oversight Inspections, five Area Visits, and two Command Assessments were conducted during FY 2006. Oversight Inspections of Category A (high risk) commands were from NAVSEASYSKOM (3), NAVFACENGCOM (2), BUMED (2), SPAWARYSKOM (2), and NAVAIRSYSKOM (1). Area Visits were conducted in Navy Regions Southwest Asia, Diego Garcia, Marianas, Northwest, and Mid-South. The Area Visits included SOH Oversight Inspections of the Regional Commands and individual activities located in the area, primarily Category B (moderate risk) activities. Command Assessments of USNA and BUPERS were conducted which included the oversight of their SOH programs.

The nine inspected Category A activities have mature NAVOSH programs where safety has increasingly become part of the command culture. Overall we found activities still to be deficient in one aspect of the Mishap Prevention Process Model and one aspect of the Supervision Model. Activities failed to fully utilize the full range of hazard data when performing mishap prevention data analyses and failed to incorporate critical elements that adequately assign safety responsibilities and accountability that meet the criteria of the Supervision Model. Commands have not obtained full regulatory compliance in a number of inspected sub-program areas.

We continue to find Regional Safety offices do not provide consistent SOH services to all tenants. SOH services in Regions are often provided on a "level of service" basis. CNIC has funded the Regions at Capability Level 3 which states that only 75% of OPNAV SOH requirements will be met. Authorization to waive 25% of OPNAV requirements has not been received by CNIC and each Region is left to determine which requirements will not be met. NAVINSGEN will continue to engage CNIC and OPNAV 09F on this issue in the upcoming year. The numerous reorganizations throughout the Navy have left some activities with little or no SOH services and oversight, including at the Echelon II level.

Based upon the initial inspection of higher echelon support, opportunities exist for headquarters commands to improve oversight of their subordinate commands. Also, several opportunities exist for CNO (09F) to provide amplifying guidance or clarification on a variety of issues.

General findings and observations regarding the Oversight Inspections conducted during the past year follows:

Echelon II Support: The objective of command SOH inspections is to ensure that subordinate commands and field activities have effective SOH programs. Command evaluations shall evaluate the results of mishap prevention efforts; assess the quality of the region or activity self-assessment program; review compliance efforts; and evaluate mishap trends. These evaluations should be of sufficient depth to enable the appropriate Commanders and designated SOH officials to monitor the effectiveness of the respective command or activity programs. Echelon II or equivalent inspections were being conducted within the required three-year

timeframe except for one activity. However, seven of the nine Category A activities were cited as having deficient command inspections. The Echelon II inspections were typically of insufficient depth and tended to focus only on regulatory compliance aspects and did not inspect all of the required items. NAVINSGEN routinely identified deficiencies in the mishap prevention and compliance areas that were overlooked by the Echelon II SOH inspections.

Energy Control Program (ECP): NAVINSGEN recommended CNO (09F) provide amplifying guidance to Navy activities to conduct periodic reviews of their ECP and to require Immediate Superiors In Command to inspect the their subordinate commands ECPs. Also, NAVINSGEN recommended that standardization of all ashore and afloat ECPs be considered. Present wording in OPNAVINST 5100.23G is not sufficient, since many activities fail to fulfill federal regulatory requirements based upon their interpretations of the document. Refer to NAVINSGEN Reports # 1824 and 1830.

Enterprise Safety Application Management System (ESAMS): NAVINSGEN recommended the expedited evaluation of this system. One of the goals of the Naval Safety Strategy Plan of Actions and Milestones is to conduct such an evaluation. The recommendation to CNO (09F) was to expedite this evaluation and to include all potential participants, such as BUMED in this review. Refer to NAVINSGEN Report #1824.

National Security Personnel System (NSPS) Safety Performance Elements: NAVINSGEN recommended that CNO (09F) review and validate existing guidance concerning safety performance elements and to provide the results to the Navy's NSPS Program Executive Officer for use in developing proposed guidelines for performance standards related to safety. Failure to have proper performance standards has been one of the most common administrative inspection findings and should be given attention when switching to the new system. Refer to NAVINSGEN Report # 1824.

SOH Training: Recommendations were provided to CNO (09F) to clarify existing Navy SOH training requirements. SECNAV requirements for annual refresher training in the area of Employee Hazard Reporting are not identified in OPNAVINST 5100.23G. Responsibilities for conducting annual hearing conservation training are ambiguous, leading to duplications and omissions in training. Clarification is needed on whether specified Fall Protection Program training is mandatory or optional, and if there will be a process to allow alternative fall protection competent person training courses. The lack of proper training requirements is hindering the Navy's mishap prevention efforts. Refer to NAVINSGEN reports #1825 and #1826.

Safety Officers/Managers: Current OPNAV policy requires the head of the safety organization to be a safety professional who reports directly to the Commanding Officer (CO). This year one command and several other commands in past years were found to have their safety manager reporting to someone other than the CO. Objective 6.6.1 of the Naval Safety Strategy Plan of Actions and Milestones requires Echelon IIs to conduct a comprehensive review of the placement of safety personnel within organizations to support the mishap reduction campaign. NAVINSGEN recommended that CNO (09F) review the existing policy and align it with the Naval Safety Strategy Plan. Refer to NAVINSGEN report # 1825.

Industrial Hygiene (IH) Staffing Formula: NAVINSGEN recommended that CNO (09F) coordinate with BUMED to review and validate the current IH staffing formula in Chapter 3 of OPNAVINST 5100.23G. Over the last several years, IH staffing levels have dropped in relation to the formula and are now approximately 45-50% of what the formula specifies. The formula was last validated and modified in 1993. Since then, there has been a change in IH survey periodicities that significantly impacted workload and staffing needs. Refer to NAVINSGEN report #1827.

Mishap Prevention Efforts: A noticeable increase has been observed in command involvement and participation in mishap prevention efforts. For the inspected activities, overall Injury and Illness Rates (IIR) are going down and several of the activities are making significant progress towards meeting the 75% reduction in injury and illness goals. Along with drops in the IIRs are corresponding decreases in workers' compensation costs. Activities do a good job of analyzing mishap data (reactive/trailing indicators), but almost half the commands have not been completely successful in analyzing hazard data (proactive/leading indicators such as inspection reports, near misses, industrial hygiene surveys, etc.). As a result, opportunities to further reduce mishaps are missed.

Self-Assessment Process: All but one of the activities inspected had performed a recent self-assessment. The depth and scope were variable, ranging from excellent to needing significant work. Generally, the self-assessments did not contain all the required elements. For example, they focused primarily only on regulatory compliance issues, but did not address the adequacy of SOH resources or level of personnel participation. Seven of the Category A Oversight Inspections conducted this year found no evidence that the activity SOH council, or equivalent, reviewed or concurred with the activity self-assessments or improvement plans required by OPNAVINST. Also, the SOH councils did not review the progress being made on improvement plans. Future inspections will concentrate more on the activities' self-assessments and what they have done as a result of the findings.

Outside Program Support: The level of IH and Occupational Medicine (OM) support provided was found to be good. Only isolated instances were identified where either IH exposure assessment or OM medical surveillance services were deficient. Regional Injury Compensation Program Administrators are fully supporting activity efforts and have become instrumental partners in many of the injury compensation cost reduction efforts. Several of the inspected commands are experiencing decreases in compensation costs.

Safety Management Systems and Regulatory Compliance: Eight of the Category A activities inspected have the Navy Process Measurement and Review System (PR&MS) and one activity, Portsmouth Naval Shipyard has attained OSHA Voluntary Protection Program (VPP) Star status. Additionally, several NAVFACENCOM and NAVSEASYS COM commands are in various stages of pursuing VPP Star status. Most of the regulatory compliance deficiencies identified were those that could be identified by safety office staff, supervisors and employees, or through the self-assessment process. Most could also be corrected at the local level. During FY 2006, deficiencies occurred in a variety of the program areas, with the most common findings in safety

training (6 of 9 inspections), hazardous materials (4 of 9), employee hazard reporting (4 of 9) and use of personal protective equipment (4 of 9).