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MANAGEMENT COMMITMENT IN

OCCUPATIONAL SAFETY AND HEALTH

AS IT RELATES TO FEDERAL AGENCY PROGRAMS

By

JOHN STERLING CRUMBLEY

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MANAGEMENT COMMITMENT IN

OCCUPATIONAL SAFETY AND HEALTH

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JOHN STERLING CRUMBLEY

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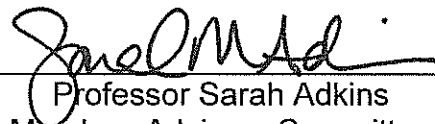Embry-Riddle Aeronautical University
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Submitted to the Faculty of the Graduate School of
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DEDICATION

This thesis is dedicated to my children
who continually motivated me to strive for success

My beautiful wife Rebecca
who never wavered in the support she gave me during my studies

Mr. James Bailey
who advised me of the importance of continuing education

And

My Mother & Father
who have championed all of my endeavors

Abstract

By asking the question "*in what areas of 29 CFR 1960 are Federal Agency Program leaders deficient with regard to committing to their OSH programs;*" this research project explored the commitment issue(s) Federal Agency Leaders encounter while administering their OSH programs. Since the inception of the Occupational Safety and Health Administration (OSHA) and their revelation that management commitment is critical to OSH program success, senior leadership has struggled exercising this concept. Many safety professionals, such as those cited in the Literature Review of this study have also examined this issue. However, while many articles and peer-reviewed journals indicate there is a definite nexus between management commitment and OSH program effectiveness, none seem to identify those regulatory components senior leaders neglect or find challenging.

A twenty-three question survey was created and issued to leaders from two respective federal agencies. Questions focused on OSHA guidance regarding elements of a successful OSH program as prescribed by 29 CFR 1960. To aid in answering the research question, common themes were identified as areas that leaders barely focused on or blatantly ignored. Upon scrutinizing the data, there were several indications as to what the underlying causal factors are. Based on this data recommendations for corrective action were offered.

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Chapter 1

Introduction

<u>Background</u>

Prior to the twentieth century there is little information pertaining to the safety and health of American workplaces. During this era, workers encountered various types of occupational hazards ranging from animals and hand tools, to ladders and stairs. With the onset of the Industrial Revolution these same workers substituted steam engines for animals, machines for hand tools, and elevators for ladders (Aldrich, 2001).

Although work conditions improved, employers still showed little concern for the wellbeing of their employees. If an employee suffered a work-related injury, their only recourse was to sue their employer for negligence while taking unpaid, but necessary time away from work. In the event of a fatality the onus for litigation rested with the employees heirs. Unfortunately, if the employer was able to prove the employee accepted job-related risk, was injured by the actions of another employee, or was generally negligent; the law suit was usually dismissed. To that end, the majority of injured employees never received compensation and those who did were awarded approximately half of their annual salary. Amongst many employers and managers alike, employee safety and health was inherently foreign terminology until the passage of Workers Compensation Laws in 1908.

Workers Compensation systems are fundamentally a no-fault mechanism through which employees who incur work-related injuries and illnesses are compensated with monetary and medical benefits (Schneid, 2000). The system of Workers Compensation serves as a monetary inducement for employers to prevent injuries and illnesses amid their employees. The logic behind the system and the reason why employers embraced it is because they realized employee medical costs and lost wages resultant of placing employees in injurious work environments can easily exceed the costs associated with establishing safe and healthful working conditions. While the implementation of Workers Compensation Laws drove incident rates down and provided employers direction toward employee safety, it did not motivate them to truly commit to employee safety and health. Ultimately, employers were still inspired by such things as production cost, deadlines, employee turnover rates, throughput, etc. Thus, rendering employee safety and health inconsequential. In light of the uncertainty of the safety and health of the American workforce, the United States Congress took action.

In 1970 the United States Congress enacted United States Code Title 29 Chapter 15, *Occupational Safety and Health*; with President Richard Nixon's support and signature the *Occupational Safety and Health Act of 1970* was passed. The purpose of the Act was to assure the safe and healthful working conditions for working men and women through three targeted efforts: by authorizing enforcement of the standards developed under the Act, by assisting and encouraging the states in their efforts to assure safe and healthful working

conditions, and by providing for research, information, education, and training in the field of occupational safety and health (Nixon, 1970). In addition to the 34 sections contained in the Act, Section 5(a)(1) and (2) discusses the lawful duties imposed on employers. In accordance with the aforementioned section, each employer shall comply with the Act and ensure they provide their employees a safe and healthful work environment which is free from recognized hazards that may cause harm or death. With this new legislation in place, employers were motivated to pay more attention to their employees safety and health and the environment in which they worked. However, the Act failed to commission an entity that would be charged with ensuring provisions of the Act were being carried out.

In 1971 the Occupational Safety and Health Administration (OSHA) was formed and sanctioned to serve as the regulatory arm of the OSH Act of 1970. Since its creation, employee fatality and injury rates have drastically decreased. Though prior to 1970, statistics on work-related injuries, illnesses, fatalities, and workplace conditions were not well-maintained; it is estimated that approximately 14,000 workers were killed on the job (OSHA, 2013). Since that time, there has been a decrease of approximately 4,300 work-related fatalities while the workforce has nearly doubled. Subsequent of the OSH Act, the rate of reported serious workplace injuries and illnesses has declined from 11 per 100 workers in 1972 to 3.6 per 100 workers in 2009 (OSHA, 2013).

With the powers vested in them by Congress, OSHA successfully improved safety and health for employees in the workplace. Amongst their

various methods to obtaining compliance from employers, they have the ability to levy monetary penalties for standards violation. Although effective in the private sector, this ability does not extend to federal agencies. Therefore, the success OSHA has had in the private sector with getting employers to comply with standards, abate identified hazards, and commit to the safety and health of their employees is most often non-existent in federal government. For that reason, federal agency senior leaders have no disincentive for choosing not to commit to the safety and health of their workforce. In an attempt to address this concern specifically, on February 26, 1980 President Jimmy Carter signed Executive Order (E.O.) 12196, *Occupational Safety and Health Programs for Federal Employees*.

E.O. 12196 serves as a more prescriptive extension of the OSH Act specifically for federal agencies and imposes additional responsibilities on agency leaders. In addition to re-iterating Section 5 of the OSH Act, E.O. 12196 provides direction for Occupational Safety and Health Committees, the Department of Labor, the Federal Advisory Council on Occupational Safety and Health, and the General Services Administration. In order to enforce this E.O., 29 CFR Part 1960, *Basic Program Elements for Federal Employees* was promulgated by OSHA on October 21, 1980.

The primary purpose of 29 CFR 1960 is to enforce the basic program elements established by the OSH Act and expounded upon by E.O. 12196. Although agency leaders are required to operate a program in accordance with the basic program elements, those elements contain numerous provisions which,

by their terms, permit agency leaders the flexibility necessary to implement their programs in a manner consistent with their respective mission, size, and organizational structure (OSHA, 1980). It can reasonably be inferred that perhaps penalties are not levied on federal agencies because OSHA recognizes the uniqueness each agency possess, which in turn may prevent them from obtaining full compliance. Consequently, although logical, OSHA inherently debunked their primary method of obtaining compliance from these employers and instead, unofficially, made regulatory standards negotiable. Thereby, giving Federal Agency Program (FAP) leaders the latitude to determine their level of commitment to the safety and health of their employees.

Applicable to private industry and FAPs, OSHA has promulgated countless standards, guidance documents, and tools to ensure employers have the necessary resources they need to provide their employees a safe and healthful work environment. However, OSHA has yet to develop regulatory requirements governing management commitment and tenets therein. In 1982, OSHA enacted the Voluntary Protection Program (VPP) which promotes effective worksite-based safety and health. Within VPP, management, labor, and OSHA established cooperative relationships at workplaces that have implemented comprehensive safety and health management systems. Approval into VPP is OSHA's official recognition of the outstanding efforts of employers and employees who have achieved exemplary occupational safety and health programs (OSHA, 2013). The motivation for employers, private sector and Federal Agency Programs, to aspire to achieve VPP "Star Status" was the

understanding that OSHA would inspect their programs and facilities less often; or approximately every 60 months. In light of this initiative and associated incentive, VPP curbed some of the management commitment issues, but was not a complete solution. In 1988, OSHA solicited best practices from employers around the nation with focus on safety and health program management. Information received led to the 1989 "*Safety and Health Program Management Guidelines; Issuance of Voluntary Guidelines*" federal register document to be used by employers to prevent occupational injuries and illnesses. The language in the guidelines is general so that it may be broadly applied in general industry, shipyards, marine terminals, and long-shoring activities regardless of the size, nature, or complexity of operations. The guidelines consist of program elements which represent a distillation of applied safety and health management practices that are used by employers who are successful in protecting the safety and health of their employees (Foster, 1989). This guidance document provided definite direction for correcting management commitment issues, but did not solve the problem.

In 2009, in effort to curb the negative trend FAPs were experiencing and to shed light on the importance of OSH within the federal government; OSHA announced its new inspection targeting program i.e. "FEDTARG." The charter for this program directed the inspection of FAPs in an organized and targeted manner. More specifically, those agencies experiencing a high number of lost time injury cases, as reported by the federal Office of Workers Compensation Programs (OWCP) would be program participants. Since FEDTARG is a very

specific program, the associated governing directive provides explicit direction to OSHA Compliance Health and Safety Officers (CHSO) with respect to how the inspections will occur , frequency, etc (Barab, 2009).

The issue with FEDTARG is twofold. The program is based unilaterally on Workers Compensation data and although the inspections are slightly more rigorous than typical no-notice inspections, they are handled the same with respect to violations. When a Notice of Violation (NOV) is issued, OSHA expects the agency to implement corrective action, but lacks the necessary motivator to ensure things get accomplished in a judicious and "timely" manner. Moreover, the program premise intertwined Workers Compensation programs with safety programs.

There is definitely an interdependency between the two programs, but they are not necessarily reliant on each other and may function independently. For example, not every OSHA-recordable incident is compensable and not every OWCP claim is OSHA-recordable. To that end FAP leaders, once aware of the FEDTARG participation criteria, began focusing on OWCP versus safety programs. OWCP directly relates to agency expenditure whereas many safety incident and hazards garner residual cost or none at all. Unfortunately, institution of the FEDTARG program failed to realize its purpose; drive down lost time cases by conducting targeted, comprehensive "safety" inspections. Lost time cases did decrease, but safety programs remained virtually unchanged.

Commitment to safety should be articulated at the highest levels of an organization and to be effective, must be translated into shared values, beliefs,

and behavioral norms throughout those levels. An effective occupational safety and health program requires a positive safety culture based on mutual trust between management and employees, and a desire to actively look after one's own safety and the safety of others. Although this concept seems practical, Federal Agency Program leaders and managers struggle to realize this foundational principle.

Statement of The Problem

Full management commitment, as defined and prescribed by OSHA, is lacking among Federal Agencies. For more than four decades, since the creation of OSHA, Safety Professionals have noted a resounding parallel between the application of thorough management practices in OSH programs and a low incidence of work-related injuries and illnesses. History has revealed where effective management commitment is prevalent in OSH programs, injury and illness rates are considerably lower than rates at similar worksites where management commitment is weak or non-existent. Thus, identifying the barriers Federal Agency Program leaders and managers encounter when negotiating the commitment component of their OSH programs is imperative to bolstering safety programs across all federal agencies.

Purpose of The Study

The purpose of this study is to identify areas of Federal Agency OSH programs which are ignored by Federal Agency Leaders and ultimately inhibits

them from fully committing to their OSH programs. Factors of Federal Agency OSH programs that OSHA deems necessary such as: as accountability, management visibility and involvement, program understanding, and resource allocation will be reviewed to determine where weakness exist. Recommendations for improvement will be offered to refute the dissention Federal Agency Program leaders have toward full OSH program commitment.

Potential Significance

This study was noteworthy in that it explored a prevalent issue that plagues all Federal Agencies. By conducting this study, it also serves as the foundation for future studies or scholarly research. Moreover, identifying the linchpins to this issue and providing specific, measurable, achievable, realistic, and timely (S.M.A.R.T) soloutions for improvement could be invaluable to Federal Agency Program leaders and their employees.

Definition of Terms

Federal Agency: an Executive Department or any employing unit, or authority of the Executive Branch of the Government (OSHA, 2013).

Management Commitment: senior leaders, managers, and supervisors actively participating in the organizational Occupational Safety and Health program by committing resources, making and enforcing policy, and being "visible" champions of safety in the workplace.

Safety Climate: An organizational factor that refers to the workers shared perceptions of the organizations policies, procedures, and practices as they relate to the value and importance of safety within the organization (Zohar, 1980)

Safety Culture: A set of values, perceptions, attitudes, and patterns of behavior with regard to safety shared by members of the organization; as well as a set of policies, practices, and procedures relating to the reduction of employees exposure to occupational risks, implemented at every level of the organization, and reflecting a high level of concern and commitment to the prevention of accidents and illnesses (Fernandez-Muniz, Montes-Peon, & Vasquez-Ordas, 2007)

Safety Management System: An integrated mechanism in an organization designed to control the risk that can affect workers health and safety, and at the same time ensures the organization can easily comply with relevant legislation (Fernandez-Muniz, Montes-Peon, & Vasquez-Ordas, 2009).

Senior Leadership: the top-level managers or executives of an organization responsible for providing vision, policy, and direction to its workforce. Establishes organizational goals and associated metrics used to indicate the progress toward achieving the vision. Responsible for the Occupational Safety and Health program, workplace conditions, and employee safety and health.

S.M.A.R.T.: A mnemonic used to help set objectives to achieve goals and make recommendations to control hazards when managing risk in employee workplaces. Corrective actions and (or) abatement strategies should be: Specific

(concrete, detailed, well defined), Measurable (numbers, quantity, comparison), Achievable (feasible, actionable), Realistic (consider resources), and Timely (defined timeline).

Assumptions

It was assumed survey respondents answered the questions candidly, without bias, or fear of reprisal based on assurance and guidance provided by the researcher. In effort to instigate participation, respondents were advised that their personal information would not be collected or included in the study. Respondents were also assured that their supervision would neither have oversight or involvement in the study.

Conclusions, recommendations, and other associated information derived from the survey were exclusively representative of the sample group.

Limitations

The sample group was comprised of 20 respondents from two different federal agencies. Participation was not mandatory and therefore only 44 percent (7/16) responded from one agency and 68 percent (13/19) responded from the other.

In addition to providing instructions on how to complete the survey, respondents were asked not to delegate completing the survey to their subordinates. Due to the anonymity of the survey, it is unknown as to whether it was completed by the intended person or someone else. However, as an

disincentive for the intended sample group to not follow instructions, the researcher gained the support of the sample groups supervising officials. A message from those individuals was sent ahead of the survey reiterating, to the intended audience, the importance of their candid feedback and singular participation.

Organization of the Study

This research project is organized into five primary chapters: *introduction, literature review, methodology, research findings and analysis, and discussions and implications.*

Using a 5-point Likert Scale (5=strongly agree, 4=agree, 3=neutral, 2=disagree, 1=strongly disagree), data was collected from senior leaders within two Federal Agencies.

Survey questions were strictly based off 29 CFR 1960, *Basic Program Elements for Federal Employees.* Surveys were administered to senior leaders via Microsoft Outlook email which had an embed hyperlink that enabled access to the internet-based survey portal. Within the email and again in the survey instructions, the researcher expressed that their responses will be completely confidential, that no one from their organization will see their responses, their superiors will not see their responses, and their completed survey would be deleted upon data extrapolation.

Chapter 2

Literature Review

Literature Review Presented In No Particular Order Of Relevance

Abudayyeh, Fredericks, Butt, and Shaar (2006) studied the correlation between management commitment to safety and the frequency of construction-related injuries and illnesses. A significant part of the study was performing an thorough literature review as well as an analysis of injury and illness data gathered from the Bureau of Labor Statistics (BLS). The BLS analysis confirmed that the construction industry accounted for 20 percent of workplace fatalities and 8.8 percent of occupational injuries and illnesses across all industries. The top 500 construction companies in the U.S. were targeted for the study. The survey crafted for the study was divided into two parts: 1) company profile and 2) safety information. Safety-related questions pertained to safety budget, communication skills, safety culture, empowerment, continuing monitoring and improvement, and involvement. Respondents were contacted by mail and telephone and of the 410 surveys mailed, 12.5 percent were returned. After examining the data, results indicated there is a direct correlation between management commitment and employee incident experience. In addition, the study revealed that 48 percent of the respondents rated safety as the companies number one priority. However, data also suggests that as incident rates decreased the priority of safety decreased as well; and vice versa. Finally, the study revealed that those

companies with some type of safety management system in place to compliment OSHA regulation yielded lower incident rates and a better overall safety record.

Bhattacharya & Tang (2013) researched the effectiveness of the managers role as it relates to OSH in the British shipping industry. OSH in the shipping industry has been in distress for some time. Research of years past indicate the rate of fatalities were between13 and 28 times higher than that of the general British workforce. It was identified that a causal factor was poor regulatory standards and the fact that senior leadership was typically on-shore while the bulk of the workforce was off-shore. Thus, they restructured themselves stepping away from traditional regulation (being inspected by a third party and correcting issues) and implemented an International Safety Management (ISM) system, which allowed them to virtually self-regulate. However, although the ISM directed ship managers to assume more responsibility for managing OSH programs (and they did), this new way of doing business had very little overall impact. In effort to determine the shortfall of the new system, Bhattacharya & Tang conducted a study of two shipping companies using employee surveys and workplace observations. Of the two companies, one operated globally and the other maintained a European base. It was found that the problem resided in the organizational structure (for both companies). Historically, there is a great dichotomy between the workforce, management, and senior leadership. Off-shore there are four supervisor/managers, while the rest of the workforce is made up of seafarers (front-line employees). With this hierarchal divide and due to employees fear of losing their jobs, there is no chatter about safety issues.

Employees perceive that if they raise concerns about OSH, then that may be construed as complaining, which could lead to expulsion. Unfortunately, although ship management conducts periodic OSH meetings and invite employees to participate and voice concerns; employees choose not to speak. Moreover, managers seem to have adopted a dictatorship style of leadership, which to their ignorance, is counterproductive to fostering OSH participation amongst employees. Based on these findings, it was concluded that if management would change their leadership style to be more democratic, that would positively affect change amongst the workforce; which in turn impacts the OSH program.

This study is important to the research project because it identified that the programmatic disconnect was not management commitment per se, but with where and how management chose to focus their efforts. In this case management followed direction by taking control of the OSH program, but along the way failed to realize the importance of active employee involvement, which is more than meeting attendance.

Bragg (2002) explored the four core tenets of employee and management commitment and the synergy that must be present to yield OSH program success. Commitment tenets for employees and management respectively include 1) want to, 2) have to, 3) ought to, and 4) uncommitted. Bragg suggest that the best employees are those who "want to" work for their employer, while those employees who fall into categories 2-4 are less desirable. Category 2-4 employees are said to be problematic, not focused, and less productive. Similarly, management who "want to" be committed to their employees and

organization do what is necessary to create and sustain attractive work environments. Committed employers desire to be known as the "best place to work." Category 2-4 managers are committed to their employees only because they have to show some signs of commitment to attract a workforce. These employers merely satisfy legal requirements of occupational safety and health and do what is necessary to stay competitive. Bragg concluded that although many factors affect employers commitment to their employees, three contributors stand out as primary drivers: fairness, trust, and care and concern for employees.

This article is important because it explored the converse side of management commitment by categorically placing employees and employers accordingly. By doing this it enables one to identify motivators, which in turn can help shape action. As such, it reveals that although management may be genuinely committing themselves to their OSH programs and employees; misperception, inconsistency, and insincerity will undermine their efforts. Thus, it is equally important for management to not only look inwardly for improvement, but outwardly at the workforce as well. This sort of holistic examination may lead to a more synergistic relationship between management and the workforce.

Du Pont Safety (1989) researched how "Improved Safety Could Save Billions." Exactly 676 companies from around the world were included in the study representing such industries as mining, power generation, construction, food processing, textiles, pulp and paper, chemicals, refining, paint, rubber, steel, printing, electronics, automotive, trucking, and general manufacturing. The premise of this study was basic in that Du Pont collected lost workday case

(LWC) data from participating companies and determined that each company could save an average of $3.1 million over a five-year period by improving worker safety, while potential total savings could reach $2.1 billion. The $2.1 billion figure is based on the 35,100 LWC reported each year by companies included in the study. Total annual cost for these LWCs was $677 million, using the National Safety Council's estimated cost of more than $19,300 per LWC. As comparison, for drawing their conclusion, Du Pont also examined companies with lower LWC rates. Du Pont found that "the key to success is management commitment and if safety is seen as important as production and product quality, then an 86% improvement in LWC rates is a realistic goal. Additionally, Du Pont adds that at a 5% profit margin, the savings could mean as much as $42 billion in sales, making safety a very profitable consideration.

Although rudimentary at its core, this study is important because it effectively depicted LWC as dollars; this is not a new idea. However, by Du Pont researching various industries in the U.S. and abroad magnifies the necessary relationship between "sound" management commitment and organizational success.

Fernandez-Muniz, Montes-Peon, & Vasquez-Ordas (2007) analyzed "safety culture" within the organizational construct. To include an exhaustive examination of topical peer reviewed study's and articles; this study surveyed 455 organizations with a goal of developing a model for positive safety culture and identifying its tenets. During the literature review it was discovered that there is not a universally agreed upon model of what positive safety culture is or what

its primary components are. It was also found that many of the past study's based their findings primarily on the employees perspective. By using information gathered during the literature review, the authors developed questions to be used in the survey. The survey was administered to senior leadership, managers, supervisors, and employees; all selectees were randomly chosen to participate. Survey topics included safety policy, incentives, training, communication, planning, control, managers commitment, employees commitment, and safety performance. The study concluded that positive safety culture has three main components: 1) management commitment, 2) employee involvement, and 3) a safety management system. In addition, they found that managers play an essential role in reducing hazards since they have dual influence on employee attitudes and behaviors, which are indicative of the safety management system.

Fernandez-Muniz, Montes-Peon, & Vasquez-Ordas (2009) looked into the relationship between occupational safety management and organizational performance. To ensure they gained a pulse of what has been researched versus what had not; the researchers conducted an extensive literature review. Expectedly, they found that other researchers before them had studied various aspects of management commitment and safety, but none had focused on the holistic effect safety management has on an organization. Recognizing that Spanish organizations severely lacked safety culture, the researchers focused their study accordingly. They hypothesized the following: 1) the safety management system has a positive influence on safety, 2) the safety management system has a positive influence on competitive performance, and 3)

the safety management system has a positive influence on economic-financial performance. Using notions gleaned from the literature review they constructed a survey to be issued to 455 Spanish organizations. Survey content was based on: safety policy, employee incentive, training, communication, planning, and controlling activities. The study concluded that there is direct causation between safety management and organizational performance. More specifically, in response to their hypothesis, they found that keen safety management reduces incident rates, curtails materials damage, improves working conditions, enhances employee motivation, refutes absenteeism, bolsters productivity, stimulates innovation, strengthens the organizational image, sustains sales, impacts profits, and maintains marketability.

A limitation of this study is that the researchers thought it was necessary to only obtain information from the organizations Safety Managers. They figured this would be the only way to ensure adequate and truthful feedback was collected. In this respect, the data could be interpreted as being biased because the respondent pool was made up of safety professionals, who in their own right will view safety as a linchpin to organizational success. However, it may have been worthwhile to collect opinions from other employees in order to add non-biased points of view. In doing so the data could have painted a more complete picture as to what safety management truly influences.

Fograscher (1999) spoke about the importance of knowing how to sell safety to executives. It was identified that although management commitment is vital to OSH program success according to OSHA, NIOSH, and other reputable

and governing bodies; none of these entities have described exactly how to obtain it. Thus, Fograscher states that when marketing anything, the marketer must know their audience. To obtain management commitment, the safety professional must speak the executive's language. For, example, if the executive is motivated by numbers then safety information should be presented statistically; if the executive is production oriented then safety information should be presented in terms of how lost work days negatively impact production capability and the profit margin. Fograscher's research indicated that "Role Clarity" is key to ensuring appropriate management commitment, meaning the executive must know what is expected of him or her and how to achieve success in order to be successful.

This article is notable because it introduces Role Clarity as a concept to be considered when trying to obtain management commitment. Often times safety professionals expect senior leaders to inherently understand their role as it relates to OSH. However, if those duties and responsibilities are not fully and clearly articulated then failure or lack of support is imminent.

Frik (2011) researched OSH Management Systems (MSs) and there relation to employee influence. The article explored the fruition of voluntary MSs versus regulatory MSs. The article defined voluntary as an organization operating under a self-developed or other recognized MSs that meet minimum regulatory standards, but provides the latitude of self-monitoring. Conversely, those organizations not choosing to adopt a MS are those seemingly managing their OSH program, issue to issue, and remain subject to external audits by regulatory

bodies. By comparing and contrasting MSs in various European countries to include the United States; research indicates voluntary MSs seem to focus more on employees reporting less injuries as opposed to working toward abating the hazards that lead to injuries. Additionally, these same organizations do not receive the benefit of external audits and thus, according to research, tout a good OSH program while reality may indicate otherwise. To that end, it was concluded that an active OSH MS of any type neither guarantees employee influence or a successful OSH program. It did, however, explicate the importance of management commitment regardless of whether the MS is voluntary or regulatory. Management commitment is the component of an OSH program that is universally acknowledged as necessary to OSH program success.

Gyekye and Salminen (2007) examined the nexus between positive organizational support and organizational safety climate. This study hypothesized that the safety climate of an organization, which is a subset of safety culture, will be positive or negative based on the employee's perception of organizational support. Through a survey, employee interviews, and workplace observations, 320 industrial workers participated in the study. Respondents varied in age, education level, and length of employment. In addition to the many sub-categories, the survey questioned worker safety, co-worker safety, supervisor safety, management safety, satisfaction with safety programs, and incident frequency (self-measured). Overall, results supported the hypothesis that employees who perceive the organization as being supportive, attentive, caring, and genuine expressed high perspectives toward the organizational safety

climate. Contrariwise, those employees who expressed discontent with organizational support, articulated dissatisfaction with the organizational safety climate. In addition, the study revealed that participation in safety programs seemed to be an avenue employee used to reciprocate their appreciation of organizational or managerial support.

A limitation of this study was that employees were asked to provide information on how often they have safety-related incidents as opposed to the surveyor gathering actual data from organizational incident records or a reputable labor statistics gathering body.

Huang, Verma, Chang, Courtney, Lombardi, Brennan, Perry, (2012) examined, specific to the restaurant industry, employees perceptions of safety training versus management commitment to safety and the association with future injuries and whether or not these concepts would be better treated as two elements of a singular factor (safety perception) or as two separate factors. According to the Bureau of Labor Statics the restaurant industry is ranked third in the total count of injuries and illnesses for industries with 100,000 or more non-fatal cases. Using a Cohort Study model, the researchers surveyed thirty-four limited service (fast food) restaurants located in six states. The researches spent approximately one working day at each location conducting employee observations and surveys. Measured areas included demographic information, perceived management commitment to safety, perceived safety training, and future injury rates. In addition, respondents were asked to provide incident data to the researchers for the twelve weeks following the survey and were paid to do

so as an incentive. Respondents provided this information by telephone, internet-based survey, or by accomplishing written follow-up survey forms. The study concluded that employee's perceptions of management commitment to safety and safety training were both significant predictors of future injury outcomes at times and not at all during other times. The variation resides with the employees understanding of training and their perception of management's commitment to safety. For example, while many employees viewed new-hire orientation as a part of their safety training, other employees did not. Consequently, the study also revealed that many employees performing the exact same duties, in identical environments, and who received like training perceived their training differently. These variances confirmed, when compared to observational data, that when employees perceive the management as having a high level of commitment to safety, then their perception of safety training is equally high; and vice versa. Finally, the researchers also concluded that the concepts are better off being treated as two separate factors.

A limitation of this study is that it did not factor in management's perception of their commitment to safety and safety training. This information would have been useful as comparative data to the data retrieved form the employees.

Kedjidjian (1995) discussed the importance of understanding that the philosophy of "do as I say and not as I do" has no place in any safety program and will be a hindrance if continually practiced by management. By way of referencing successful CEO's who understand the importance of employee

safety and its correlation to profitability and productivity, Kedjidjian solidified the notion that if management is not fully and outwardly committed to OSH in the work environment then efforts to develop and sustain a safe and healthful work environment will be futile. Safety professionals being helpers and advisors to management versus having OSH program ownership was also a theme in the article. This theme supported the management commitment tenet in that senior-level management should have a deep enough understanding of their OSH program so that when the safety professional (technical advisor) presents information, they can comfortably make an informed decision. Kedjidjian conveyed that all too often management shy's away from accepting OSH program ownership due to lack of sufficient understanding of basic OSH principles. Kedjidjian also discussed how to effectively market safety to management to obtain their interest and buy-in.

A limitation of this article was Kedjidjian's discussion on managerial accountability. Although it was discussed indirectly, the article seemed to lean more toward marketing safety versus how to hold management accountable for their safety programs.

This article will be useful to this research project because it alluded to the nexus between managerial accountability, management commitment, and successful OSH programs. The correlation between these three components leaves much to be researched, discussed, and fleshed out. OSH has always been a supporting program and has hardly ever been deemed mission critical or "key." Many safety professionals like Kedjidjian often touch on accountability, but

only usually when referring to supervisors and employees. Since this research project will examine aspects of managerial accountability, discussion points this article presented will be helpful.

Lyon and Hollcroft (2005) examined national and international safety and health management systems (SHMS) and its widespread use across various organizations. According to their research, of the many notable SHMS's, including OSHA's VPP, the key factors analogous with all of them is "leadership and management commitment are the most critical elements." They discovered that each of the voluntary SHMS emphasizes the importance of continual improvement and as such derived a model which promotes the notion of "plan-do-check-act" or PDCA. In each of the components they cite senior management as the linchpin to success. For example, plans cannot be made amongst various organizational departments prior to senior management creating an OSH policy, which should align with the overall organizational vision. In addition, during the "act" (implementation) phase where most would think this is the sole task of front-line supervisors; Lyon and Hollcroft hinges success on how well management communicates their vision, policy, and plan and why it is important to their employees. This use of effective communication not only conveys their direction, but as the messengers, directly involves them in the program.

Marsh (2010) discussed how to deter the workforce away from bad habits and temptations to "cut corners." By applying the ABC model (antecedents, behaviors, consequences), it was found that employees lack the will and (or) encouragement to ask why. As such, this missing factor has the potential to set

in motion a chain of events that influence negative or less desirable employee behaviors. Marsh believes management who trains supervisors on what they want them to do without taking time to explain why or answer questions, effectively limit their employees capabilities and fosters unsafe behavior. By taking time with employees to hear their concerns, take action on reasonable issues, and have frequent peer-to-peer interaction, management will innately be displaying their commitment. Marsh also acknowledges their remain those managers who think they are committed to their OSH program although they treat safety as a necessary evil that hinders production.

This article is relevant to the research project because it subtly portrays another side of effective" management commitment. The article indicates that management commitment is more than establishing policy, and giving direction. It can be management simply making themselves available to their employees, ensuring they follow-through and follow-up, and walking their talk.

Michael, Evans, Jansen, & Haight (2005) examined the relationship between non-safety outcomes amongst employees and management commitment. This study readily acknowledged the importance of management commitment, but approached their study from the standpoint of whether or not it unilaterally influences employee perceptions of safety and associated programs. By surveying 641 hourly employees at three wood products manufacturing facilities, this study pooled data on subjects such as: perceptions of management commitment to safety, perceived job-related dangerousness, organizational commitment, and withdrawal behaviors. Results indicated that the social

exchange between management and employees is a more predominant factor than basic management commitment. When employees felt as though their work and they as individuals were valued by their employer, they felt indebted to their employer and reciprocated accordingly. This reciprocation was not directly derivative of management's singular commitment to safety, but their overall organizational support. As employees perceive they are emphatically being taken care of they respond with safer work practices, increased production, and reduced absenteeism. This study also recognized that managers are often faced with conflicting priorities which ultimately causes them to choose where to focus their attention. However, while managers juggle their conflicting priorities, employees simply want to feel genuinely valued and in turn will take care of their employer the best way they can. Typically, employees will reciprocate in a manner that is related to safety since it's something they have direct control of.

O'Toole (2002) examined the value of Safety Culture and its components as it relates to safety and health program improvement and incident reduction. Several years prior to the survey, company leadership decided to change their safety culture from being driven by compliance to being driven by "doing the right things." To accomplish this, they integrated safety into the managers and supervisors performance plans and focused on leadership commitment and accountability. The study was not only meant to gain a pulse of this new culture with goals of proving or disproving the cultural shift, but to also serve as a baseline to be used to derive future metrics. The study was conducted using a 41-item modified Minnesota Perception Survey with question geared toward:

management's commitment to safety, education and knowledge, safety supervisor process, employee involvement and commitment, drugs and alcohol, emergency response, and off-the-job safety. The study's subject was a mining and construction products company with facilities and employees in eight states. A total of 3,116 employee surveys were issued and 1,114 were returned and scrutinized. Results indicated a direct connection to employee perceptions and a reduction in injury rates resultant of management's new approach to safety.

A limitation of this study is that it did not survey supervisors, managers, and senior leaders to gain their perspective of why their cultural shift has had a positive effect on the OSH program. It could be assumed that they would merely state the obvious in that their shift in attitude resulted in a trickle-down effect ultimately changing employee perception. However, having data to confirm or deny suspicions would have added value.

Smith, Cohen, Cohen and Cleveland (1978) researched characteristics of successful safety programs by conducting on-site surveys of seven pairs of various manufacturing companies. Program areas rated included: corporate organization, management commitment to safety, management efficiency, plant solvency, plant physical characteristics, workforce characteristics, union characteristics, pay scheme, and safety program characteristics. In addition to issuing employee surveys to volunteers, the assessment team spent two-thirds of their time conducting employee and staff interviews and observing work practices. This observation allowed the researchers to effectively compare and contrast the companies. Ratings were averaged from the surveys on a seven-

point scale (1-very poor to 7-excellent), which generated "high" and "low" incident potential rates. The individual ratings were then categorized low or high in each measured area depending on the raw number. As additional comparative data and justification for their findings, notes from the interviews and observations were also considered. Results of the study indicated plants with a low incident potential rate had greater management commitment and involvement in plant safety matters, greater skills in managing material and human resources, used a humanistic approach when dealing with employees, possessed higher levels of housekeeping and environmental qualities, had less absenteeism and turnover, and did not employ a dedicated safety manager/director.

This study will benefit the research project because it confirmed that neither processes nor targeted program oversight supersedes "direct and personal" management commitment. This study revealed that, on average, those companies with structured safety programs (collateral duty safety officers, awards and recognition programs, safety committees, etc) were not as successful as those companies whose senior leaders simply took a personal interest in the safety and health of their employees. This study proved that management meaningfully interacting with employees directly contributes to a successful safety program.

Trebswether (2003) examined the United Parcel Service's (UPS) Comprehensive Health, and Safety Process (CHSP) to determine the root of their OSH success. Through employee and leadership interviews and work practice observations, Trebswether found that UPS largely contributes its success to its

workforce. Although UPS cites management commitment as a pivotal component to the overall process; UPS likes to think of its managers and senior leaders as the support system to the employees safety program. Within leadership approved parameters and by way of the CHSP, employees are given complete autonomy with respect to administering the OSH program. Managers and senior leaders stay involved by making themselves available to hear employee concerns and making it a point to correct unsafe and/or unhealthful working conditions. This method has built a trust between management and the workforce and has proven successful in that between 1996 and 2001, UPS reduced its lost workday injury/illness frequency by 49 percent and helped reduce automotive incident frequencies by 16 percent. Management's motto is "safety is just another slogan if it doesn't come from the top and if it doesn't have some teeth."

Walker and Maune (2000) examined the implementation of a "step-change" safety program for a multi-million dollar construction project in the Middle East. At the onset of the project, Chevron, the parent company, wanted to ensure their model of "protecting people and the environment" echoed overseas among their foreign subsidiaries and that their typical mindset of ignoring safety was negated. Thus, they contracted a safety consultation firm who developed and implemented a safety model that expounded upon Chevron's core model and encompassed some foundational principles of occupational safety and health. Of the three tier model, the first tier directly involved executive leadership and held them accountable for various aspects of the model such as visible commitment, funding, and genuine support. Tiers two and three included all other

necessary OSH programmatics spanning from audits and incentive programs to training, safety committees, and employee accountability. After 28.5 months (design and construction), the project was completed below budget and with an exemplary safety record. In more than 13 million construction hours worked, the company only experienced one lost-time injury and two recordable injuries. The model revealed that no factor weighed heavier in their success than management commitment.

A limitation of the model is that the consultant firm based success on rates. Although numbers are excellent for comparative data, conducting a climate survey amongst the workforce once the project was complete may have provided a clearer picture and perhaps revealed an anomaly that also contributed to the outcome, but was not considered at the onset of model implementation.

The significance of this study is that it indicates the pillars of successful safety and health programs are not only effective in the United States, but hold true across cultures and national borders. Though the consultant firm approached Chevron with a pre-determined model in mind, they made certain to account for cultural differences, which ensured effective implementation of their processes. This approach also shed light on the importance of leadership taking the necessary time to understand their workforce.

Conclusions

The Literature Review identified studies and peer-reviewed articles that overwhelmingly supported the theory that whether an organization is within the

confines of the United States or abroad, and regardless of the industry or organizational structure; management commitment is the most important component when developing, implementing, and sustaining a successful occupational safety and health program. All studies and articles supported this notion through employee surveys, interviews, and workplace observations. However, a predominant issue yet to be explored is the proverbial question "where are senior leaders deficient with regard to committing to their OSH programs."

This Literature Review effectively underscores why management commitment is necessary as well as provides feasible models on how to achieve it, but lacks content or theory on why it continues to be cited as the "weakest link" within OSH management systems and (or) programs. Moreover, due to the lack of relative information, this Literature Review does not provide any information on management commitment as it relates to Federal Agency Programs. Consequently, this research project aims to extend previous research by identifying and investigating the reason(s) Federal Agency Program leaders struggle to commit to their OSH programs. Though, a typical methodology will be used to glean information, the difference will be based on who the information is obtained from; senior leaders. By surveying senior leaders, top management officials, executives, managers, etc and asking them very pointed questions; this research project will attempt to unravel this issue and offer recommendations for corrective action.

Chapter 3

Methodology

Context of the Study

This study was designed to identify areas of Federal Agency OSH programs which are ignored by senior leaders and ultimately inhibits them from fully committing to their OSH programs. The anonymous, web-based survey provided respondents the opportunity to answer question freely without fear of reprisal. It also gave the researcher an understanding of why certain elements of an OSH program are indeed overlooked.

To ensure survey validity, questions were strictly based off 29 CFR 1960, *Basic Program Elements for Federal Employees.* This regulation requires that all federal agencies conduct self-evaluations on a recurring basis to "determine the effectiveness of their occupational safety and health programs. The self-evaluations are to include qualitative assessments of the extent to which their agency safety and health programs are: (a) developed in accordance with the requirements set forth in Executive Order 12196 and part 1960 and, (b) Implemented effectively in all agency field activities (OSHA, 1980)." All questions are directly related to specific program areas discussed in the regulation and were thus deemed appropriate and necessary for overall compliance. By design, the survey provided a since of familiarity to respondents since they are asked comparable questions on a recurring basis from their servicing safety staff.

Selection of Participants

The sample group consisted of senior leaders from the Transportation Security Administration and Dobbins Air Reserve Base.

Transportation Security Administration Background

Following September 11, 2001, the Transportation Security Administration was created to strengthen the security of the nation's transportation systems and ensure the freedom of movement for people and commerce. TSA secures the nation's airports and screens all commercial airline passengers and baggage.

Dobbins Air Reserve Base Background

The mission of Dobbins Air Reserve Base is to provide highly trained Citizen Airmen who execute versatile and reliable C-130 aircraft operations. To accomplish this, it recruits, organizes and trains Air Force Reservists for active duty in time of war, national emergency, or contingency tasking.

A pre-requisite for study participation included organizational position. This involved possessing the title, position, and associated responsibilities of "Commander" at Dobbins and "Federal Security Director" at the TSA, both of which are senior leader or executive level positions which encompass supervision of 100 or more employees. No other criteria was consider.

The researcher chose participants from the TSA and Dobbins because he is employed with both organizations as an Occupational Safety and Health Manager, has intricate knowledge of operations, and is professionally acquainted with many participants in the sample group. Having knowledge and understanding of selected organizations enabled the researcher to examine data

and compare that information to what typically occurs based on daily observations and interactions.

Research Questions

In what areas of 29 CFR 1960 are Federal Agency Program leaders deficient with regard to committing to their OSH programs? This study sought to answer this question by issuing a twenty-three question survey based on OSHA prescribed essential program elements to a group of federal agency program leaders.

Data Collection

The research design was based solely on the survey and its proper distribution to respondents, and analysis of data received. The survey was composed of "structured questions" that were designed to garner fixed responses i.e.: strongly agree, agree, neutral, disagree, and strongly disagree. Questions were worded in a way that induced respondents to answer only in terms of the five aforementioned options. The survey was comprehensive and provided a structured question for each point OSHA deems essential to senior leader commitment.

The survey remained accessible to participants for 30 calendar days. This timeframe was chosen to ensure maximum participation since those in the sample group are typically inundated with mission responsibilities.

The survey was created using Adobe Forms Central, copyright © 2011-2013 Adobe Systems Incorporated and its licensors. All Rights Reserved. The program allowed the researcher to develop the survey, provided a dedicated website for participants to access the survey, and gathered necessary information, which enabled the researcher to analyze data retrieved.

Data Analysis

In accordance with 29 CFR 1960, *Basic Program Elements for Federal Employees* and responsibilities it charges to senior leaders, every survey question should have been responded to with "strongly agree" or "agree." The method used to analyze data retrieved from the survey was to identify those questions that garnered 30% or greater response from respondents with "neutral," "disagree," or "strongly disagree" and note them as "common themes." Upon identification they were extrapolated for further assessment. To that end, of the twenty-three survey questions, five were recognized as common themes.

Subjectivities or Bias

To ensure bias was omitted from the study, the researcher derived survey questions from 29 CFR Part 1960, *Basic Program Elements for Federal Employees* and did not add to or take from the intent of the regulation. This method made certain questions were fair, relative, and appropriate for all respondents. Since the researcher is employed by both agencies, the study was conducted separate from day-to-day activities and labeled as a *special project* for

the purpose gaining an understanding of how Senior Leaders manage their Occupational Safety and Health programs. There were no incentives offered to respondents for their participation.

Chapter 4

Research Findings and Analysis

Findings and Analysis

The survey used in this study was comprised of twenty-three questions. Five of the twenty-three were identified as "common themes" or contributing factors to the issue at hand; *in what areas of 29 CFR 1960 are Federal Agency Program leaders deficient with regard to committing to their OSH programs.* Listed below, in no order of relevance, are the five "common themes" with the percent of respondents, the OSHA requirement or guideline, and a textual analysis.

1. *(50%) I ensure all employees are evaluated on their OSH performance.*
   o "Each agency head shall ensure that any performance evaluation of any management official in charge of an establishment, any supervisory employee, or other appropriate management official, measures that employee's performance in meeting requirements of the agency occupational safety and health program, consistent with the employee's assigned responsibilities and authority, and taking into consideration any applicable regulations of the Office of Personnel Management or other appropriate authority. (OSHA, 1980)."

Evaluating an employee's OSH performance is the basis for establishing a system of accountability amongst the workforce. A primary concern for many employees is to ensure that, at a minimum, they meet standards developed by

their employer. It is not uncommon for employees to hold non-performance items to a lesser degree of consideration while focusing on those items their employer deem important. This practice fosters an environment of non-compliance coupled with a lack of understanding and respect for safety.

In order to hold employees accountable for their safety and the safety of others, it is incumbent on management to ensure employees are aware of and understand the organizational policy. Understanding does not germinate and propagate within the workforce by management stating OSH is important, then contradicting themselves by not rating employees on OSH performance. Establishing appropriate OSH evaluation criteria solidifies the organizational policy, echoes managements position, reinforces employee responsibility, and bolsters a Culture of Safety.

2. *(45%) I ensure adequate financial resources are budgeted for OSH program administration.*

   o "The Designated Agency Safety and Health Official, management officials in charge of each establishment, safety and health officials at all appropriate levels, and other management officials shall be responsible for planning, requesting resources, implementing, and evaluating the occupational safety and health program budget in accordance with the regulations of the Office of Management and Budget Circular A-11 (sections 13.2(f) and 13.5(f)) and other relevant documents (OSHA, 1980)."

Administration of an OSH program requires funding and resource allocation to exist or thrive. A typical OSH program will require funds and resources for hazard abatement, special assessments, equipment maintenance, facility upkeep, program promotion, awards and recognition, multi-media, etc. When leadership considers what the annual budget for the organization should be, OSH must be considered. Failure to budget for OSH is detrimental to a thriving program and stifling to the onset of a one. Leaderships willingness to budget appropriately for the administration of their OSH program is indicative of their commitment

3. *(30%) I attend safety meetings.*

   o "Committees shall have equal representation of management and non-management employees, who shall be members of record (OSHA, 1980)".

To foster a Culture of Safety and demonstrate commitment, management should participate in OSH safety meetings. This will allow them to respond to safety issues and concerns and develop solutions to aid in the implementation of their OSH program. Similarly, employees should work closely with and under the direction of management in support of the OSH program and suggest initiatives to promote general safety awareness in the workplace. In this forum employees are afforded the opportunity to voice their concerns and obtain immediate and direct feedback from the individuals charged with ensuring their workplace is safe and healthful. Collaboration to this extent bolsters a trusting work relationship

between management and the workforce and establishes a layer of accountability for both sides.

4. *(40%) I issue an annual OSH Policy Letter that enforce local OSH policy and goals; and set expectations for a culture of safety.*

- o "Management Commitment. (i) State clearly a worksite policy on safe and healthful work and working conditions, so that all personnel with responsibility at the site and personnel at other locations with responsibility for the site understand the priority of safety and health protection in relation to other organizational values. (ii) Establish and communicate a clear goal for the safety and health program and objectives for meeting that goal, so that all members of the organization understand the results desired and the measures planned for achieving them (Foster, 1989)."

The issuance of an annual OSH Policy Letter is an extremely useful tool leadership can utilize to communicate their personal commitment to their establishment's OSH program. By taking time to establish goals, crafting a road map for achieving those goals, and agreeing to a level of self-accountability is necessary. The "commitment letter" or OSH Policy Letter is a critical step toward establishing or maintaining an OSH program.

To maintain the integrity and usefulness of the letter, it is crucial that leadership agree to terms that are reasonable and S.M.A.R.T. The letter should not be viewed as "just another requirement," but rather an opportunity to communicate to the workforce and provide a transparent mode of operating with

regard to OSH. Appropriate use of this mechanism will refute incredulity amongst the workforce and provide employees something tangible they can refer to indicating not only goals, but expectations as well.

5. (50%) When I conduct Town Hall Meetings, Commanders Calls, etc; Occupational Safety and Health is always an agenda item.

- o "Provide visible top management involvement in implementing the program, so that all will understand that management's commitments is serious (OSHA, 1980)."

Amongst other vital components that add to an effective OSH program, leadership visibility may be the linchpin that determines its success or demise. The crux of Manage Commitment is leading by example. This includes such actions as donning personal protective equipment when in the workplace, accomplishing required safety training, holding employees accountable, and making time to discuss OSH in the same breath with operational performance, efficacy, and solvency.

Within federal agencies, occupational safety and health is not typically viewed as an expenditure such as equipment and manpower that can be managed. Although, there is a definite relationship between OSH performance and overall organizational success; this relationship is not always seen as an immediate concern. Therefore, OSH is not given a high enough priority that warrants time and focus of leadership. Instead OSH is usually managed with the "Fireman's approach." For example, Fireman fight fires as they arise with vigor commensurate to the size and type of fire.

It must be realized by leadership that the Fireman's approach to managing OSH is ineffective. OSH programs require constant maintenance and surveillance and a notable way for leadership to exercise their commitment and address current and continual issues is through Town Hall type meetings. It is important that the workforce hear from their leaders that he or she is aware of their concerns and is taking necessary steps to rectify them.

In summary, it can reasonably by concluded that "time, understanding, and motivation" are undertones among the common themes that suggest cause for why FAP leaders are deficient with regard to committing to certain areas of their OSH programs. Each of five themes noted require a degree of understanding what is required, time to appropriately execute, and motivation to ensure follow-through.

Unlike the private sector where motivation may drive understanding and time due to the threat of penalties and a tarnished organizational safety record which may adversely impact future earnings; Federal Agencies do not have that same motivation. Federal Agencies are anomalies woven into regulatory standards with the expectation that they will comply, but also with the understanding that if they do not it is somewhat acceptable.

Chapter 5

Discussions and Implications

Full management commitment to an organizations Occupational Safety and Health program communicates the message that safety is valued as a primary priority, even at the expense of productivity, and ensures that personnel are not reprimanded for erring on the side of safety. In order for Senior Leaders to successfully transmit their commitment to safety in the workplace, the following components are necessary:

Visibility and Participation

- Provide positive feedback for employees and supervisors using safe work practices during walk-around management.

- Take time to support safety activities (walk the talk).

- Ask supervisors about incident investigations, causal and contributing factors, and the status of corrective actions.

- Participate in Safety Committee meetings and encourage progress on action items.

- Include safety as an agenda item at regular meetings at all levels.

- Participate in occasional informal inspections.

Acknowledging Consequences of Non-Action

The reactive approach results in increased economic and social costs of incidents. Recognize that ignoring or delaying safety program activities and corrective actions has negative effects, including:

- Increased vulnerability to the mission.

- Worsening system deficiencies, deteriorating working conditions, and increased safety hazards.

- Lower employee morale.

Engaging the Workforce

Encourage a questioning attitude toward workplace operations and conditions.

- Seek employee participation in developing and implementing solutions.

Implementing Best Practices

Discuss safety as the first item on the upper level meeting agenda. Possible topics to include are:

- Current incidents and related causes.

- Status of corrective actions from prior incidents.

- Focus on prevention activities.

Create an Incident Review Board, the purpose of which is to

- Demonstrate management commitment and interest in a safe and healthful work environment for all employees.

- Discuss the circumstances of the incident with the involved employees and witnesses (if applicable).

- Evaluate the incident investigation report and related information to determine if causal and contributing factors and recommendations for corrective action are accurate.

- Eliminate or, at a minimum, reduce future occurrence of incident.

Become a Safety Champion

Safety Champions are anyone and everyone at the work locations embraces OSH. When promoting a Culture of Safety, Senior Leaders must stress upon everyone that they are a Safety Champion in the organization as they:

- Perform job duties in a professional, safe manner every day, every time; and offer and accept advice on improving work processes.

- Provide enthusiastic support and participation for safety events.

- Learn about and educate other employees about local safety goals, events, and systems.

- Assist the Safety Committee, when requested, to create strategies and processes that promote local safety initiatives.

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Appendix

Occupational Safety and Health Program Survey Questions and Data

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
01. I ensure that the OSH Policy Statement signed by the Senior Agency Official (Installation Commander, Administrator, etc) is displayed in prominent locations within work areas.	0%	0%	5%	35%	60%
02. I ensure guidance on OSH Protection for employees is thorough and posted in prominent locations throughout employee work areas.	0%	0%	10%	40%	50%
03. I issue an Annual OSH Policy Letter that enforces local OSH policy and goals; and sets expectations for a Culture of Safety.	15%	10%	15%	35%	25%
04. My managers, supervisors, and employees are made aware of agency and local OSH policy, goals, and expectations.	0%	0%	5%	50%	45%
05. I encourage employees to identify safety and health hazards, correct them when appropriate and/or submit an Unsafe or Unhealthful Working Conditions Report.	0%	0%	0%	20%	80%
06. I ensure OSH policy, goals, and expectations are communicated to all employees	0%	0%	5%	40%	55%
07. I actively participate in the OSH program.	0%	0%	10%	30%	60%
07a. I personally demonstrate safe work practices and behaviors.	0%	0%	10%	30%	60%
07b. I attend safety meetings.	0%	20%	10%	30%	40%
07c. When I conduct Town Hall Meetings, Commanders Call, etc; Occupational Safety and Health is "always" an agenda item..	5%	15%	30%	35%	15%
08. I ensure managers, supervisors, and employees support local OSH goals and objectives.	0%	5%	5%	35%	55%
09. I expect managers and supervisors to intervene in the safety behavior of others.	0%	0%	0%	15%	85%
10. I ensure all employees are evaluated on their OSH performance.	0%	10%	40%	35%	15%
11. I ensure OSH program tasks are specifically assigned and clearly communicated.	0%	0%	15%	35%	50%
12. I expect managers and supervisors to investigate incidents, accidents, mishaps, etc and enforce OSH standards, rules, and regulations in the workplace.	0%	0%	5%	10%	85%
13. I hold all employees accountable for their OSH performance.	0%	0%	5%	35%	60%
14. I ensure there is OSH staff to administer the program.	0%	0%	15%	20%	65%
15. I ensure Collateral Duty Safety Officers, Unit Safety Representatives, etc have the necessary knowledge, skills, and information to perform their duties.	0%	0%	10%	25%	65%
16. I expect individuals to be recognized by their immediate supervision for their contributions to the OSH program.	0%	0%	10%	30%	60%
17. I personally recognize individuals for their contributions to the OSH program	0%	0%	10%	30%	60%
18. I ensure adequate financial resources are budgeted for OSH program administration.	0%	5%	40%	30%	25%
19. I rely on my Collateral Duty Safety Officers, Unit Safety Representatives, etc to administer the OSH program.	0%	0%	5%	20%	75%
20. I personally ensure the OSH program is maintained in accordance with federal, agency, and local policy and guidance.	0%	5%	10%	25%	60%

Vita

John Sterling Crumbley was born in Detroit, Michigan on September 3, 1979. He attended grade schools in the Southfield (Michigan) area School District and graduated from Bishop Borgess High School in May, 1997. The following September, he entered Lawrence Technological University where he studied Industrial Management. In 1999 he enlisted in the U.S. Air Force where he earned the rank of Technical Sergeant. During this time he also earned Associates of Science degrees in Aircraft Armament Systems and Safety Science from the Community College of the Air Force; and a Bachelor of Science degree in Professional Aeronautics from Embry-Riddle Aeronautical University, Daytona Beach, Florida. In 2011 he separated from the active duty Air Force, joined the Air Force Reserves, took a position with the Federal Government, and entered Eastern Kentucky University; where in 2014 he earned a Master of Science degree in Safety, Security & Emergency Management.

He is presently employed as an Occupational Safety and Health Manager for the Federal Government.