

National Archives and Records Administration

Transmittal Memo

DATE: February 16, 2021

TO: All Employees

SUBJECT: NARA 235, Safety and Occupational Health Program

Purpose: This memo transmits a revised and updated NARA 235, Safety and Occupational Health Program.

Background/significant changes: This revision and update of NARA 235 reflects safety and health updates from the new Collective Bargaining Agreement of 2019. The new Agreement includes the requirement to establish a Local Safety and Health Committee (LSHC) at all NARA facilities. In addition, the Security Management Division (BX) is changing the technical guidance format. The Safety and Occupational Health Program Handbook will be published as multiple supplements instead of a single, comprehensive document. This will make future updates of technical guidance quicker and easier.

Available forms: None.

Canceled forms: None.

Canceled policy: NARA 235, dated March 22, 2013.

Effective date: This directive is effective on the date of signature.

Contact information: For questions on this directive, please contact Bruce Zaczynski, BX at (301) 837-2024, email bruce.zaczynski@nara.gov or safety@nara.gov.

DEBRA STEIDEL WALL
Deputy Archivist of the United States

Attachment

National Archives and Records Administration

NARA 235
February 16, 2021

SUBJECT: NARA 235, Safety and Occupational Health Program

235.1 Policy.

The NARA Safety and Occupational Health (SOH) Program provides policy and related guidance to support a safe and healthful workplace for all NARA employees, contractors, volunteers, interns, and visitors.

235.2 Scope and Applicability.

This policy applies to the following individuals:

- a. All NARA employees (full-time, part-time, and intermittent; permanent and temporary) including career interns;
- b. NARA volunteers;
- c. NARA student interns;
- d. Contractor employees working under NARA contract;
- e. Employees, volunteers, contractors of the National Archives Foundation, and of Presidential Library Foundations who work in or access NARA-controlled spaces; and
- f. Employees of other Federal agencies who need recurring full-time or part-time unaccompanied access to staff-only areas of NARA facilities.

235.3 Responsibilities.

- a. Safety and Occupational Health Program Manager (SOHPM)
 - (1) Manages the SOH program and serves as the program subject matter expert on safety and occupational health;
 - (2) Develops policies, procedures, and training; provides guidance and assistance; and regularly reports on workplace safety and health;
 - (3) Advises the Designated Agency Safety and Health Official (DASHO) and Safety and Occupational Health Program Coordinator (SSHC) on SOH program budget needs;

- (4) Reviews all Notices of Violation (NOV) regarding the Occupational Safety and Health Administration (OSHA) standards. Recommends corrective actions to be taken, coordinates implementation of corrective actions with appropriate officials, and reports substantiated NOV's to the DASHO, NARA General Counsel (NGC), and the Office of the Inspector General (OIG); and
 - (5) Periodically assesses the effectiveness of the SOH program through on-site inspections, evaluation of self-assessment reports from Local Safety and Health Committees (LSHC), and review of accident, injury and near miss reports (NA 6054). Uses all of these to develop a hazard mitigation strategy.
- b. The National Safety and Health Committee (NSHC)
 - (1) Makes recommendations to the DASHO for action plans to achieve goals and objectives for the SOH program and develops action plans based on recommendations from NARA LSHC, Executives, supervisors, and employees;
 - (2) Provides an open forum for all NARA organizations, employees, and LSHCs to exchange safety and occupational health information in the workplace; and
 - (3) Monitors and reviews inspection reports, assessments, and proposed safety policy as identified in OSHA regulations and the NSHC Charter to provide a safe and healthful workplace for NARA employees and others who occupy NARA facilities.
- c. Local Safety and Health Committees (LSHCs)
 - (1) Collectively implements NARA SOH policy, program, and requirements to achieve objectives and goals that are in the best interests of the employees;
 - (2) Provides recommendations to the local designated official, directors, field support officer, or facility manager for implementing action plans to correct any safety concerns;
 - (3) Oversees and coordinates the activities of the local NARA facility SOH program;
 - (4) Develops NARA SOH program activities, actions, and recommendations for initiatives based on recommendations from NARA NSHC or interested managers and employees of the local facility;

- (5) In collaboration with the NSHC, provides a forum for all organizational units and employees within the local facility to exchange safety and occupational health information in the workplace; and
 - (6) Reviews inspection reports, assessments, and proposed safety standards as identified by local management, OSHA, and/or NARA regulations.
- d. Executives, Staff Directors, Library Directors, Field Support Officers, Managers, and Supervisors
 - (1) Ensure the establishment of Local Safety and Health Committees and provide adequate resources to support the SOH program for their employees and occupants at their facilities;
 - (2) Appoint individuals to serve as representatives of Management on the LSHC, coordinate with the President of the Union for bargaining unit representatives to the committee, provide up-to-date lists of designated LSHC members to the SOHPM as changes occur, and ensure they complete required training courses;
 - (3) Develop, implement, and maintain an annual safety inspection and safety self-assessment program for SOH in accordance with 29 CFR 1960;
 - (4) Ensure employees report within 24 hours any concerns with workplace hazards and safety matters. Ensure employees complete mandatory training requirements and any remedial training requirements within 7 workdays to reduce the possibility of safety incidents, violations, or infractions.
 - (5) Submit or forward, as appropriate, Accident, Injury, Near Miss Reports (NA 6054), and local SOH program inspection results to the SOHPM in a timely manner; and
 - (6) Ensure appropriate administrative actions are taken as a result of employee-caused safety infractions and ensure that records of safety infractions are appropriately maintained.
- e. Designated Officials and/or Facility Managers
 - (1) Serve as local Safety and Occupational Health Program Coordinators (SOHPCs);
 - (2) Manage the local SOH program and ensure compliance with program procedures for a safe and healthful workplace for NARA employees by conducting an annual safety self-inspection;

- (3) Develop local procedures that address safety and occupational health issues including, but not limited to: slips, trips and falls; ladder use; forklift and pallet jack training and operation; and any other identified safety concerns;
 - (4) Ensure that individuals are aware of their responsibilities to conduct work in a safe manner and to recognize and report safety hazards; and
 - (5) In conjunction with supervisors, ensure Accident, Injury, Near Miss Reports (NA 6054) are submitted to the SOHPM at safety@nara.gov and copies the appropriate Executive or Staff Director.
- f. Contracting Officer's Representatives (CORs) ensure that safety and occupational health requirements language is written into contract documents as applicable.
- g. Employees
 - (1) Must report unsafe, unhealthful, or imminent danger situations to your supervisor, safety and health committee member, Union representative, and/or safety@nara.gov;
 - (2) Follow NARA safety-related guidance, policies, and procedures;
 - (3) In imminent danger situations, exercise your right to refuse to do a task only under the following conditions:
 - (a) Where possible, the employee has notified management of the situation and management failed to eliminate the danger;
 - (b) The employee believes that an imminent danger exists; and
 - (c) A reasonable person would agree that an imminent danger exists.
 - (4) Report to SOHPM, Site Safety (SSHO), DASHO, OIG, or OSHA any attempt to restrain, interfere, coerce, discriminate, or retaliate for filing a report of an alleged unsafe or unhealthful working condition.

235.4 Public Release

Unlimited. This directive is approved for public release.

235.5 Authorities.

- a. Public Law 91-596, "Occupational Safety and Health Act of 1970," Sections 6 and 19, pertain to workplace safety and health, require employment free of recognized hazards, and to comply with OSHA's regulations;

- b. Executive Order 12196, "Occupational Safety and Health Program for Federal Employees," dated February 26, 1980, establishes that Federal agencies must have an effective and comprehensive occupational safety and health program;
- c. 29 C.F.R. Part 1960, "Basic Program Elements For Federal Employee Occupational Safety and Health Programs and Related Matters," contains basic program elements that must be followed by Federal agencies for their Federal Employee Occupational Safety and Health Programs;
- d. 29 C.F.R. Parts 1904 and 1952, "Occupational Injury and Illness Recording and Reporting Requirements," requires employers to make and maintain accurate records of and report work-related fatalities, injuries, and illnesses;
- e. 29 C.F.R. Part 1910, "Occupational Safety and Health Standards," establishes OSHA regulations and sets workplace safety rules that apply to certain industries; and
- f. 29 C.F.R. Part 1926, "Safety and Health Regulations for Construction," contains statements of general policy and interpretations of the Contract Work and Safety Standards Act.

235.6 Records Management

In accordance with this directive and supplement, officials in several offices manage safety and occupational health related records. Dispositions for these records may be found in GENERAL RECORDS SCHEDULE 2.7: Employee Health and Safety Records. Contact Corporate Records Management for questions about implementing these mandatory instructions.