Hazard Tracking

OSHA VPP

January 2025

This presentation outlines hazard tracking requirements for the purpose of Occupational Safety and Health Administration (OSHA) Voluntary Protection Programs (VPP) implementation.

The presentation provides information on the background and importance of hazard tracking, required documentation, and the various levels of employee knowledge. It concludes with an action checklist and supplemental details to help with OSHA VPP implementation and sustainment efforts.

Objectives

- During this presentation, you will learn to:
  - Summarize the background and importance of hazard tracking
  - List hazard tracking-related documentation
  - Describe the knowledge leadership/management, key personnel, and the workforce should have regarding hazard tracking
  - Identify hazard tracking actions to implement and sustain OSHA VPP

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This presentation is beneficial to safety professionals, VPP representatives, and others with hazard tracking responsibilities.

Background

- Included in the WA criteria for VPP

- Assigns identified hazards to personnel responsible for correction

- Tracks hazards to closure

- Monitors the effectiveness of hazard controls

- Includes a feedback process on the status of tracked hazards

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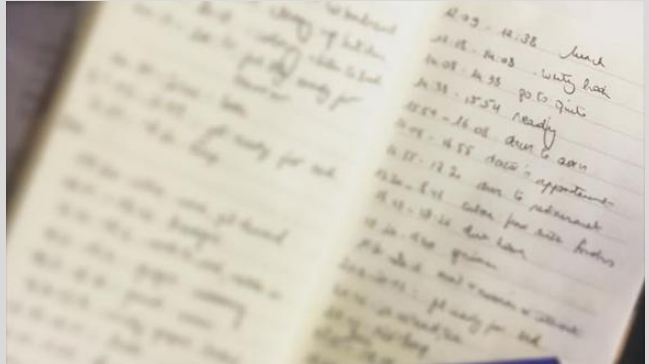
WA = Worksite Analysis

Hazard tracking closely monitors safety and health (S&H) hazards or concerns. Users input identified hazards into a tracking systems (e.g., Microsoft Excel, internal SharePoint, locally developed software). Then, safety staff or other responsible person(s) use this information to address and eliminate the hazards. The tracking log also covers inspection findings, results of mishap and near-miss investigations, findings from hazard baselines and follow-up analyses, preventative maintenance, and identified trends. Safety staff use this information to evaluate, prioritize, and recommend hazard control methods for each risk. Ultimately, the hazard reporting system works in tandem with a hazard tracking system.

The following list of documents contains provisions for hazard tracking requirements:
- Executive Order (EO) 12196: https://www.archives.gov/federal-register/codification/executive-order/12196.html
- OSHA 29 Code of Federal Regulations (CFR) 1960.28: https://www.osha.gov/laws-regs/regulations/standardnumber/1960/1960.28
- Department of Defense Instructions (DoDI) 6055.01: https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/605501p.pdf
- Department of the Air Force Instruction 91-203: https://static.e-publishing.af.mil/production/1/af_se/publication/dafman91-203/dafman91-203.pdf
- Army Regulation 385-10: https://armypubs.army.mil/epubs/DR_pubs/DR_a/ARN34981-AR_385-10-000-WEB-1.pdf
- Navy Marine Corps Instruction 5100.23: https://www.secnav.navy.mil/doni/Directives/05000%20General%20Management%20Security%20and%20Safety%20Services/05-100%20Safety%20and%20Occupational%20Health%20Services/5100.23H.pdf

Image retrieved from Microsoft Images.

Importance

- Collectively captures all identified hazards
- Documents interim control measures
- Facilitates follow up evaluations on implemented hazard controls
- Holds management responsible for addressing S&H concerns
- Prioritizes hazards to allocate resources accordingly
- Provides trending data and identifies repeat issues

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Hazard tracking helps you maintain an organized list of all identified hazards and their abatement status. This log captures any employee reported hazards, near-miss or mishap investigations, and industrial hygiene (IH) survey information specific to your worksite.

Having an organized list allows you to prioritize your hazards and identify who is responsible for mitigating the hazard (e.g., a first-line supervisor, Commanding Officer). This also ensures the availability of adequate allocations and resources.

The image shows a risk matrix used to assign a priority to hazards identified based on the amount of risk they pose to employees. Image retrieved from Microsoft Images.

Documentation

- Hazard tracking and abatement procedures
- Hazard tracking/abatement log
- Abatement plans
- Hazard report forms
- Near-miss and mishap investigations
- Hazard analysis forms
- IH survey reports
- Trend analysis from tracked hazards

Image retrieved from Microsoft Images

Make sure you provide completed examples of forms and documents to your assessment team. Don't just show them blank forms! They want to see the documents you filled out to thoroughly assess the processes within your safety management system.

Refer to your overarching DoD or Service/Agency instruction for detailed hazard tracking procedures.

Have copies of completed hazard reporting forms and completed mishap or near-miss investigations. Compare these reports to the hazard tracking log to ensure all hazards are being tracked to closure.

You may have more than one tracking log utilized in your workplace. For example, you may use one system to track mishap investigations findings and another log to track hazard reports and safety inspection findings. Whatever works best for your organization is fine!

Image retrieved from Microsoft Images.

Leadership/Management Knowledge

- Leaders and managers should know about:
  - The process for tracking reported or identified hazards
  - Their responsibilities regarding the hazard tracking log
  - Status of hazards or abatement plans
  - Their role in ensuring hazards are corrected
  - How employees are informed of existing or abated hazards

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Senior leaders and supervisors are responsible for providing a safe and healthful workspace for their employees. Leadership must be aware of how the hazard tracking log operates, as well as any open items on the hazard tracking log, especially items assigned risk assessment codes (RACs) of a 1, 2, or 3. Ensure leadership is aware of the timeline to initiate assigned corrective actions to mitigate hazards.

Leadership is responsible for correcting reported S&H hazards in a timely fashion – they may request additional support to abate a hazard. For example, the Department of Public Works may prioritize a workorder towards the end of their to-do list,; however, the safety office determined the problem may lead to a serious injury. Engage your leadership enough to expedite this support, if necessary.

The image shows leadership walking inspectors through their workspace. Image retrieved from Microsoft Images.

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Key Personnel Knowledge

- Key personnel should be knowledgeable about:
  - Responsibilities regarding the hazard tracking log
  - Items included on the hazard tracking log
  - Accident/incident investigation results
  - Status of open hazards
  - Current abatement plans
  - Hazard trends

Image retrieved from Microsoft Images

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Key personnel are generally S&H staff; however, other personnel, such as business analysts, industrial hygienists, or fire department representatives may have a separate hazard tracking system for deficiencies identified through their own inspections or audits.

The image shows an emergency response team identifying hazards and other safety deficiencies found during an exercise. Image retrieved from Microsoft Images.

Workforce Knowledge

- Employees should know about:
  - Process for reporting S&H hazards
  - Results and status of the last hazard they reported
  - Process to follow-up on a reported hazard

Image retrieved from Microsoft Images

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Encourage employee reporting and encourage leaders to recognize employees for their efforts whenever they participate. You must have a system in place to provide feedback to employee who report hazards. Employees should know the status of any hazards they have reported.

Best Practice: One organization had a contest where the employee who submitted the most hazards with an accompanying potential corrective action received a time-off award.

The image shows an employee filling out paperwork for a S&H concern. Image retrieved from Microsoft Images.

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Action Checklist

- ❑ Determine how to track identified hazards
- ❑ Identify and prioritize the hazards
- ❑ Create an abatement plan
- ❑ Implement interim protection, as needed
- ❑ Provide feedback to employees
- ❑ Provide status updates to leadership
- ❑ Close and follow-up
- ❑ Trend hazard tracking results

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Follow this action checklist to implement and sustain VPP expectations for hazard tracking. Each of these action checklist items will be covered in more detail.

Hazard Tracking

- Refer to Service/Agency hazard tracking procedures
- Utilize an electronic database or spreadsheet
- Track:

Tracking number	Description of how the hazard is discovered	Date the hazard was identified	Employee name who reported the hazard
Location of the hazard	Description of the hazard	Priority of the hazard	Date employee feedback is provided
Date of last briefing to Commander/ Executive Agent	Description of the corrective action	Person(s) responsible for corrective action	Status of corrective action
Interim and/or permanent control measures taken	Due date for corrective action(s)	Close date	Follow-up date

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Refer to your Service or Agency guidance to find out more about applicable hazard tracking procedures and requirements. EO 12196, 29 CFR 1960, and DoDI 6055.01 also have generic hazard tracking requirements.

Document all identified hazards and track them to closure. Collect the data listed on the slide to effectively document identified hazards. Assign a tracking number to each hazard and provide detailed descriptions and locations of each hazard. You can use the corresponding tracking number for all investigations and follow-up actions, if necessary.

Assign a responsible person to all reported hazards. Include a description of the corrective action and the actions performed to mitigate the hazard, including any interim actions taken until final abatement. Track the status of the corrective action until completion. Assign all identified corrective actions a due date to ensure timely mitigation of the reported hazard. Annotate the last follow-up date, the date of the last briefing to the Commanding Officer or Executive Leadership Team, the close date, and any other pertinent remarks.

Perform follow-up actions to evaluate the effectiveness and feasibility of selected controls and mitigation measures. Sometimes a control or mitigation measure may seem appropriate for the identified hazard; however, you may discover it is ineffective once implemented.

Example – Hazard Tracking Log

HAZARD TRACKING LOG

Organization Name:							
Maintained By:			Log Year:				
Log No.	Hazard Description	Hazard Location	Date	Source (How Reported)	Reported By	Employee Feedback Date	RAC
Responsible Person(s)	Recommendation		Due Date	Interim Measures in Place	Abatement Actions	Follow-Up Evaluation Date	Closed Date

Image courtesy of Concurrent Technologies Corporation

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Services and Agencies utilize several different methods to track hazards, such as a Microsoft Excel spreadsheet or a commercial tracking system.

Hazard reporting and near-miss or mishap forms describe the nature and location of the hazard, who reported it, an explanation of the perceived hazard or situation where a mishap almost occurred, what actions were taken (if any), and whether it has been fixed. Use the information from these forms to populate the hazard tracking log.

The image shows an example of a hazard tracking log. Image courtesy of Concurrent Technologies Corporation.

Hazard Identification

- Collect and track hazard information from:
  - Hazard analysis of routine and non-routine activities
  - Mishap and near-miss investigation results
  - Safety culture or perception surveys
  - Baseline S&H hazard analysis
  - Employee hazard reports
  - Safety inspections
  - IH surveys
  - Preventive maintenance
  - Trend analysis findings

Image retrieved from Microsoft Images

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Identify hazards at your workplace. The slide lists potential sources to collect hazard information at your worksite; it is not all-inclusive.

Best Practice: Conduct a safety culture or perception surveys when a new Commanding Officer arrives. Add any S&H findings to your hazard tracking log.

The image shows employees conducting hazard recognition training. Image retrieved from Microsoft Images.

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Hazard Prioritization

- Assign a RAC to each hazard
- Prioritize each hazard based on assigned RACs

Hazard Severity		Mishap Probability			
Description	Code	A Likely to occur immediately	B Probably will occur in time	C Possible to occur in time	D Unlikely to occur
Death, permanent total disability, or loss of facility or asset	I	1 Critical	1 Critical	2 Serious	4 Minor
Permanent partial disability or major property damage	II	1 Critical	2 Serious	3 Moderate	4 Minor
Lost workday injury or compensable injury, or minor property damage	III	2 Serious	3 Moderate	4 Minor	5 Negligible
Injury involving first aid or minor supportive medical treatment, a minimal threat to personnel or property, or a violation of the standard	IV	4 Minor	4 Minor	5 Negligible	5 Negligible

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Image retrieved from DoDI 6055.01

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RACs represent the degree of risk associated with a hazard. It combines elements of hazard severity and mishap probability, considering potential S&H effects. This process ensures you abate high risks hazards immediately and exhaust available resources on those risks first.

According to DODI 6055.01, "making risk decisions is a Commander's determination of which risks are acceptable and unacceptable from the standpoint of balancing the benefit against the potential for losses or harm (severity and likelihood of occurrence)." Commanding Officers generally delegate this responsibility to S&H professionals. Refer to your Service or Agency guidance when assigning RACs.

Add **ALL** hazards to your hazard tracking log, even those you correct on-the-spot or fix immediately after reporting it.

For more information on assigning RACs, view:
https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/605501p.pdf

The image shows a risk assessment table. Image retrieved from DODI 6055.01 at:
https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/605501p.pdf

Hazard Abatement

- Develop an abatement plan for RACs 1, 2, and 3

- Post notices of unsafe/unhealthful conditions, when required

- Document both interim and permanent corrective measures on the hazard tracking log

Image retrieved from Microsoft Images

Create a formal abatement plan for hazards you cannot resolve immediately. A hazard abatement plan ties a corrective action(s) to an identified hazard. The plan includes date of hazard identification, location of the hazard, description of the hazard, references to applicable standards, interim control measures, description of the abatement action, estimated cost, anticipated completion date, abatement priority, and a closeout statement. Review your Service or Agency requirements for hazard abatement plans requirements.

DoDI 6055.01 requires correcting hazards assigned a 1, 2, and 3 RAC within 60 days. You must develop a hazard abatement plan and notify all affected personnel if the hazard cannot be mitigated in this time. Some Services or Agencies may prescribe shorter timeframes, such as 30 days. Service or Agency regulations may require posting a notice about the unsafe or unhealthful conditions in the workplace (especially for RACs 1 and 2). You must post this at the hazard. Train employees on the uncontrolled hazard and any interim control measures.

Image retrieved from Microsoft Images.

Example – Abatement Plan

INSTALLATION HAZARD ABATEMENT PLAN
For use of this form, see DA PAM 385-10; the proponent agency is OCSA.

1. PROJECT NO.	2. DATE PREPARED	3. DATE REVISED
3-1-2b	21 Sep 07	6 Nov 07

4. ACTIVITY/ORGANIZATION	5. HAZARD LOCATION(S)	6. RISK ASSESSMENT CATEGORY
School Brigade Technical Services Library	Main Section Ceiling	LA (I)

7. CITATION OF SPECIFIC OSHA AND OTHER STANDARD VIOLATED
29 CFR 1910.1001(c). TB MED 513

8. DESCRIPTION OF PROPOSED CORRECTIVE ACTION OR REMEDIAL MEASURES
Revise original proposal to encapsulate ceiling material to complete removal based on cost and requirements for monitoring. All ceiling material which tests positive for asbestos content is to be removed and disposed of in accordance with the installation hazardous materials control plan.

9a. ESTIMATED COST OF CORRECTIVE ACTION	9b. APPROPRIATION
$ 16,000.00	CPA

9c. PROGRAM ELEMENT NUMBER	9d. BUDGET COST ESTIMATED (BCE: Yes ☒ No ☐)
362-109-ATES	

10. ESTIMATED ADDITIONAL OPERATING AND MAINTENANCE COSTS, IF ANY
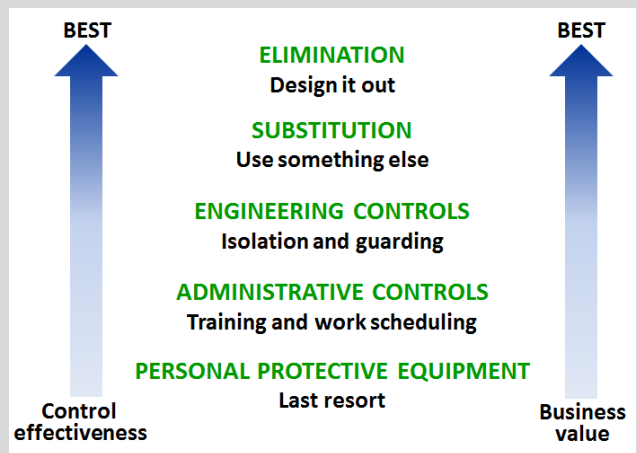$

Image retrieved from DA PAM 385-10

You may group deficiencies that are identical in nature into a single abatement plan or into an associated abatement project. For example, you can add two different buildings with non-compliant exit signs on the same abatement plan.

Close out statements describe the finalized abatement action, cost, and date of completion. Some Services and Agencies require Commanders to sign abatement plans and close items on the log. Ensure the hazard abatement plan is available for employee review, where applicable.

The image shows a snapshot of DA Form 4756, the Installation Hazard Abatement Plan (Oct 1978). Image retrieved from: https://armypubs.army.mil/pub/eforms/DR_a/pdf/A4756.pdf

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Interim Controls

- Choose temporary solutions (or interim controls) to control hazards

- Monitor interim controls frequently

- Document interim controls on the hazard tracking log

- Follow the hierarchy of controls when implementing any control measure

BEST
ELIMINATION
Design it out
SUBSTITUTION
Use something else
ENGINEERING CONTROLS
Isolation and guarding
ADMINISTRATIVE CONTROLS
Training and work scheduling
PERSONAL PROTECTIVE EQUIPMENT
Last resort
BEST
Control effectiveness
Business value

Image retrieved from Microsoft Images

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Interim control: A temporary control measure taken until you can implement a permanent fix.

Hazards can change due to ongoing operations. Check open items to make sure interim controls remain effective and the hazard has not become more of a problem. In some cases, you may correct hazards by eliminating a process or piece of equipment.

Ask affected employees for feedback. They understand their jobs best and can tell you if the interim control is working properly, or, if additional changes are needed.

Management and the safety office should review self-inspection results. Obvious hazards and repeat findings indicate a need for management intervention in the work area.

Encourage employees to report anything they suspect may be hazardous, improper, obsolete, or out of place.

The image shows the hierarchy of controls. Use the hierarchy to select the best interim control until you can implement a permanent solution. Image retrieved from Microsoft Images.

Employee Feedback

- Record employee reported hazards

- Deliver feedback to affected employees

- Provide feedback to area supervisors when receiving anonymous reports

- Document follow-up responses and reports

Image retrieved from Microsoft Images   SMCX

Acknowledge all employee reported hazards in a timely manner. Your Service or Agency guidance will provide a timeframe for responding to an employee hazard report. Provide feedback to the area supervisor for anonymously reported hazards and ask them to brief employees in the work area and provide feedback.

Inform the employee or supervisor when you are assessing, identifying, and characterizing the hazard. This feedback shows employees their concerns are valued, and management is addressing the issue.

Let them know if you assign interim controls. It's important they understand the interim controls and receive training, if necessary, on why the interim control is in place and how to use it. Finally, inform affected personnel when you abate hazards.

The image shows a supervisor discussing the status of an employee reported hazard. Image retrieved from Microsoft Images.

Leadership Involvement

- Hold status review meetings
  - Can occur weekly, monthly, quarterly, or as needed
  - Include various levels of leadership/management
- Invite employee representatives or bargaining units
- Promote leadership visibility and awareness

Image retrieved from Microsoft Images

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Provide updates on identified hazards and abatement plans to leadership and management during status review meetings. Hazard severity dictates the level of management participation. Choose a meeting frequency that allows you to assign actions and implement corrective actions.

Solicit participation from collective bargaining units – this process accomplishes two things. First, they may be able to recommend a corrective action based on experience at another location. Second, dialogue between leadership and labor representatives improves the relationship and overall safety culture.

Leadership must lead by example. Implement timely corrective actions so employees feel leadership is responsive to their concerns.

The image shows a leadership status review meeting. Image retrieved from Microsoft Images.

Follow-Up and Closure

- Perform follow-up evaluations to validate controls

- Change written procedures, as needed

- Add hazard control validations to inspection checklists

- Train affected personnel on changes

- Close entries on the hazard tracking log

- Review closed entries with leadership during next status review

Image retrieved from Microsoft Images SMCX

Physically inspect the hazard, ensure the hazard is corrected, and be sure the situation is safe before you close a hazard on the hazard tracking log. Write a close out statement in the abatement plan indicating the hazard is resolved. Be sure to identify any required follow-up measures you may need to take.

Include reoccurring hazards in safety inspection checklists or preventive maintenance. This help you identify these hazards immediately and prevent long-term exposure.

Ask personnel for feedback on the effectiveness of the correction. Not only is it a good way to validate the correction, but it also increases employee involvement, helps reinforce an active S&H program, and gives employees a voice.

The image represents an employee using new controls to perform work. Image retrieved from Microsoft Images.

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Trend Analysis

- Review all identified hazards on the hazard tracking log

- Look for repeat occurrences between past and current data

- Identify common patterns

- Identify areas of focus based on trend analysis

- Revise and establish new S&H goals and objectives

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Trending compares data and helps predict future performance. Preventive effort is far less costly than repairing or healing after an incident. It also helps develop new S&H goals and objectives and areas of focus.

Some common examples of tracking and trending hazards include:
- Frequent early failure of auxiliary light batteries in multiple lights over a group of buildings
- Anti-slip treads on some high usage stairways require more frequent replacement than routinely planned
- Buildings or areas have chronic exit and egress deficiencies due to excess material or overcrowding
- Personal protective equipment is not used as required due to user discomfort

The image shows an analyst conducting trend analysis on a set of data. Image retrieved from Microsoft Images.

Conclusion

- In this presentation, you learned to:

  - Summarize the background and importance of hazard tracking

  - List hazard tracking-related documentation

  - Describe the knowledge leadership/management, key personnel, and the workforce should have regarding hazard tracking

  - Identify hazard tracking actions to implement and sustain OSHA VPP

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