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CHAPTER 1.7 SAFETY AND HEALTH PROGRAM EVALUATION

1.7.1. Applicability of this chapter

You are required to follow this chapter if you are involved in preparing JSC's annual safety and health program evaluation. This is mostly the responsibility of safety and health professionals, though JSC organizations may provide information for the evaluation on request.

1.7.2. JSC's program evaluation

1.7.2.1 JSC has a system for evaluating the operation of its safety and health program each year. This system evaluates JSC's success in meeting safety and health goals, objectives, and helps determine needed changes to continually improve worker safety and health protection. The evaluation shall:

- a. Be a written narrative report with recommendations for timely improvements, assigning responsibility for those improvements, and documenting timely, adequate follow-up actions or the reason no actions were taken.
- b. Assess the effectiveness of all elements in JSC's safety and health program.
- c. Be done by competent JSC, NASA, or other private sector persons who are trained or experienced in evaluating safety and health programs.
- d. Follow the format specified by OSHA VPP Region VI and paragraph 4.3.6 of NPR 8715.1.

NOTE: OSHA considers JSC Main, Sonny Carter Training Facility, Ellington Field, and White Sands Test Facility as separate sites for VPP purposes. These sites may submit separate reports or combine reports.

1.7.3. Evaluate previous year's report

1.7.3.1 The process starts by evaluating the previous year's report by reviewing:

- a. Parts 1–4 to ensure familiarity with the requirements.
- b. The status of all actions listed in the previous year's report, including any closure documentation.

1.7.4. Evaluate current year's safety and health performance

1.7.4.1 Evaluate this year's performance per the following:

- a. Assess the current status of program elements through any of the following:
 - (1) Interviews with subject matter experts.
 - (2) Self-audits and inspections.
 - (3) Results of any relevant surveys.
 - (4) Any available leading metrics.
 - (5) Investigation and trend data.

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(6) Any other methods available.

- b. Provide detailed descriptions and evaluations for each VPP element based on the assessments in subparagraph a above. The report shall follow the format required by the OSHA Region VI VPP Manager.
- c. Determine actions needed to improve health and safety at JSC.
- d. Document responsible parties, closure criteria, status, and estimated closure dates for each recommended action in subparagraph c above.

1.7.5. Publish the Annual Safety and Health Self-Evaluation Report

1.7.5.1 To publish the self-evaluation report:

- a. Make sure all Center directorates have input, and opportunity, to comment on the report.
- b. Get approval signatures from:
 - (1) Chief (or designee), Safety and Test Operations Division, Site VPP Point of Contact.
 - (2) Chief (or designee), Space Medicine Operations Division, Health Officer.
 - (3) President, American Federation of Government Employees.
 - (4) JSC Safety Action Team Co-Chairs.
 - (5) Designated Safety and Health Official.
- c. Send original signed report to the OSHA VPP Lead, Houston South Office. NS and SD will each keep a copy.
- d. Post report on the JSC Safety and Health homepage.

1.7.6. Responsibilities for safety and health program evaluation

- a. The Safety and Test Operations Division is responsible for:
 - (1) Developing the evaluation report jointly with the Space Medicine Operations Division. The Safety and Test Operations Division has the final authority over the report.
 - (2) Publishing the final report.
 - (3) Providing information, jointly with the Space Medicine Operations Division, for NASA’s annual report to OSHA as required in paragraph 4.3.6.3 of NPR 8715.1.
- b. The Space Medicine Operations Division is responsible for developing the evaluation report and providing information for NASA’s OSHA report jointly with the Safety and Test Operations Division.

1.7.7. Safety and health records for safety and health program evaluation

1.7.7.1 The Safety and Test Operations Division keeps the following Center-level records to document JSC’s safety and health program evaluation:

- a. A copy of each year’s program evaluation.
- b. Documentation on tracking self-evaluation actions to closure.

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NOTE: See Appendix F, Attachment 1.1A for details on records and documentation required by this chapter.

1.7.8. Measurement

- a. Meeting the February 15 deadline for submitting the VPP Self-Assessment to OSHA.
- b. Progress on, and completion of, the actions assigned by the program evaluation.