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REPORT TO THE
COMMITTEE ON LABOR
AND PUBLIC WELFARE
UNITED STATES SENATE

More Concerted Effort Needed
By The Federal Government
On Occupational Safety And Health
Programs For Federal Employees

B-163375

Department of Labor

BY THE COMPTROLLER GENERAL
OF THE UNITED STATES

092634

MARCH 15, 1973

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON D C 20548

B-163375

Dear Mr. Chairman:

This is the first of a series of reports in response to your letter of June 22, 1972, requesting the General Accounting Office to review aspects of the Occupational Safety and Health Act of 1970 being carried out by the Occupational Safety and Health Administration, Department of Labor. This report concerns the Federal agency safety and health programs and the coordination and review of such programs by the Occupational Safety and Health Administration.

Our review showed a need for a more concerted effort by the Federal Government to insure safe and healthful workplaces for Federal employees. Our report presents various recommendations to the Secretary of Labor to achieve this.

We are recommending that your Committee consider having the Occupational Safety and Health Act of 1970 amended to bring Federal workplaces under the inspection responsibility of the Occupational Safety and Health Administration. The inspections should supplement, and not replace, inspections by the agencies' own personnel.

In accordance with our agreement with your office, the Department of Labor and various Federal agencies mentioned in the report have not been given an opportunity to formally examine and comment on its contents. We did, however, discuss the contents with Department of Labor officials. The Department, by letter dated January 3, 1973, advised us that it had taken, or planned to take, various actions along the lines we suggested. We have incorporated the Department's views in the report where appropriate.

Copies of this report are being sent to the Director, Office of Management and Budget, the Secretary of Labor, and the heads of the other Federal agencies mentioned in the report.

We believe that the contents of this report would be of interest to committees, other Members of Congress, and agency

B-163375

officials Therefore, as you have agreed, we are distributing copies of this report accordingly.

As part of our review we inspected selected workplaces at four agencies for compliance with Federal safety and health standards. We reported separately the details of our inspections to each agency head involved so that appropriate corrective action could be taken. A copy of each of these reports was submitted to you.

Copies will also be sent to the Director, Office of Management and Budget, the Secretary of Labor, the Chairman, Select Subcommittee on Labor, House Committee on Education and Labor, the Chairman, Subcommittee on Environmental Problems Affecting Small Business, House Select Small Business Committee, and Representative William A. Steiger

Sincerely yours,

A handwritten signature in cursive script that reads "James B. Axtell".

Comptroller General
of the United States

The Honorable Harrison A. Williams, Jr
Chairman, Committee on Labor and
Public Welfare
United States Senate

C O N T E N T S

	<u>Page</u>
DIGEST	1
CHAPTER	
1 INTRODUCTION	5
Creation of the Occupational Safety and Health Administration	6
Establishment of standards	7
Federal agency safety and health programs and responsibilities	7
Office of Federal Agency Programs	10
National Institute for Occupational Safety and Health	10
Occupational Safety and Health Review Commission	11
Scope of review	12
2 COMPARISON OF ENFORCEMENT AND INSPECTION PRACTICES APPLIED TO PRIVATE BUSINESS WITH THOSE APPLIED TO FEDERAL AGENCIES	13
OSHA enforcement applied to private businesses	13
OSHA enforcement applied to Federal agencies	14
Federal agency inspection practices	14
3 NONCOMPLIANCE WITH OSHA STANDARDS	19
Mechanical hazards	19
Electrical, fire, and housekeeping hazards	24
Air and workplace environment hazards	33
Toxic substances and harmful physical agents	41
4 LACK OF CONSISTENCY AND DIRECTION IN FEDERAL AGENCIES' SAFETY AND HEALTH PROGRAMS	45
Safety policies	46
Safety organizations and procedures	46
Workplace surveys	48
Dissemination of standards by Federal agencies	48

CHAPTER	<u>Page</u>	
5	FEDERAL AGENCY SAFETY AND HEALTH STATISTICS	50
	Problems with past sources of Federal statistics	50
	OSHA's new Federal agency reporting system	50
	Implementation problems	51
6	NEED FOR STRONGER LEADERSHIP ROLE BY OSHA	54
	OSHA's Federal programs' activities	54
	Safety and health regulations not issued	56
	Slow progress in evaluating agencies' programs	56
	Other OSHA activities	56
7	CONCLUSIONS AND RECOMMENDATIONS	58
	Recommendations to the Secretary of Labor	60
	Agency comments	60
	Matter for consideration by the Committee	60

APPENDIX

I	Letter dated January 3, 1973, from the Deputy Assistant Secretary for Administration and Management to the General Accounting Office	61
II	Department of Labor estimates of civilian disabling injuries and frequency rates for selected Federal agencies	65
III	List of 49 Federal agencies to which GAO sent questionnaires	66
IV	Example of low placement of safety organization	68

ABBREVIATIONS

GAO General Accounting Office

NIOSH National Institute for Occupational Safety and Health

OSHA Occupational Safety and Health Administration

COMPTROLLER GENERAL'S REPORT
TO THE COMMITTEE ON LABOR
AND PUBLIC WELFARE
UNITED STATES SENATE

MORE CONCERTED EFFORT
NEEDED BY THE FEDERAL
GOVERNMENT ON OCCUPATIONAL
SAFETY AND HEALTH PROGRAMS
FOR FEDERAL EMPLOYEES
Department of Labor B-163375

D I G E S T

WHY THE REVIEW WAS MADE

The Committee Chairman requested the General Accounting Office (GAO) to review aspects of the Occupational Safety and Health Act of 1970 being carried out by the Occupational Safety and Health Administration (OSHA), Department of Labor

This report is the first of a series concerning Federal agency safety and health programs carried out under the act and OSHA's coordination and review of these programs

As agreed with the Committee, GAO did not give the Department of Labor and various Federal agencies mentioned in the report an opportunity to examine and comment formally on its contents. However, GAO discussed these matters with Department of Labor officials and incorporated their views in the report

Background

The President has stated that the Federal Government, as the Nation's largest employer, has a special obligation to provide safe and healthful workplaces for Federal employees. The status of safety programs in the Federal Government has been elevated by the Occupational Safety and Health Act of 1970, effective April 1971, and Executive Order 11612 of July 26, 1971

Section 19 of the act requires

each Federal agency head to establish and maintain an effective and comprehensive occupational safety and health program--consistent with standards promulgated by the Secretary of Labor--and to provide safe and healthful work conditions for Federal employees

Executive Order 11612 sets forth the criteria for Federal agencies to use in establishing occupational safety and health programs. The order requires the Secretary of Labor to issue regulations to provide guidance to Federal agencies in fulfilling their responsibilities under the act

The order also established a Federal Safety Advisory Council to consult with and advise the Secretary. The Council consists of 15 members appointed by the Secretary and includes representatives of Federal departments and agencies and labor organizations representing employees.

Federal safety program requirements apply to approximately 120 Federal departments and agencies, and agencies cover about 3 million civilian employees in about 5,000 occupations

In 1971 the Federal work force suffered about 37,000 disabling injuries and 255 fatalities at an estimated cost of \$118 million for compensation and medical expense. The Labor Department estimates that related property damage costs are

MARCH 15, 1973

between a quarter and a half billion dollars annually

FINDINGS AND CONCLUSIONS

OSHA has expended time and effort in emphasizing the importance of Federal occupational safety and health programs. Since the act was passed, Federal agencies have taken steps to improve their safety programs. However, much more needs to be done if the Federal Government is to insure that its agencies are complying with the standards it is enforcing in the private sector and to insure safe and healthful conditions in workplaces.

Enforcement and inspection practices

OSHA's enforcement and inspection practices differ significantly between private businesses and Federal agencies. For private businesses OSHA enforces compliance with safety and health standards through inspections and penalties authorized by the act. The act provides that Federal agencies can be inspected only with the consent of the agencies. (See p. 13.)

The act gives the Secretary of Labor access to Federal agencies' records of occupational accidents and illnesses, and Executive Order 11612 authorizes him to evaluate agencies' safety and health programs and to make inspections, but only with the consent of the agency heads.

At the time of GAO's fieldwork, OSHA had evaluated the published safety programs at the headquarters of four Federal agencies and had inspected two Federal workplaces. (See p. 14.)

Federal agency inspection practices

Responses to a GAO questionnaire

from 49 Federal agencies indicated that workplace inspections often varied from a walk-through by a safety official to an inspection which was part of a review involving matters unrelated to safety. Typically, agency personnel conduct the inspections as part-time, collateral duties. (See p. 15.) Three of the 49 agencies used only full-time inspectors, 15 used full-time and part-time inspectors, and 27 used part-time inspectors. Four had no inspection programs. (See p. 15.)

Forty of the 45 agencies having inspection programs documented violations of safety and health standards, and 34 of the 40 maintained inspection records. Eleven did not routinely maintain inspection records, although six did document violations. (See p. 15.)

The time allotted in which officials responsible for safety and health violations are required to take corrective action varied widely among the 49 agencies. The time between initial and followup inspections to determine if corrective action was taken also varied widely. (See p. 15.)

Noncompliance with safety and health standards

GAO inspected workplaces of four Federal agencies in the Washington, D. C., area and found about 200 instances of noncompliance with OSHA's safety and health standards.

Noncompliance included mechanical, electrical, fire, and housekeeping hazards which could seriously injure employees. Other instances related to hazards in the air and workplace environment, such as the presence of toxic substances. About 50 of the instances were sufficiently

severe that, had they been found in private businesses, the businesses would have been subject to monetary penalties assessed by OSHA (See p 19)

Lack of consistency and direction

Of the 49 agencies surveyed, 46 stated that they had occupational safety and health programs. Although many agencies had established the programs before the act was passed, many modified their programs as a result of the act (See p 45). The existing programs, however, lack consistency and overall direction.

The 49 agencies' responses indicated that they had reacted to the act in a variety of ways:

- For those with longstanding programs, the act appeared to cause only minor revisions (See p 45)
- Three reassessed their occupational safety and health activities and made changes. One established its first full-time safety officer. Another established a safety office and a formal safety organization and published an agency safety and health handbook. A third made a comprehensive survey to determine what actions were needed to bring its field installations into compliance (See p 45)
- A number either created occupational safety and health programs or added significant elements to existing programs (See p 45)
- There was much diversity among the agencies' safety and health program components, such as safety policies, organizations, procedures, and workplace surveys (See p 46)

Federal agency safety and health statistics

In the past, statistics on incidence and rate of accidents and illnesses among Federal agency personnel have come from several sources and systems, resulting in inconsistency and unreliability. OSHA has imposed a uniform recording and reporting system on Federal agencies, which is a potential improvement, but a number of problems remain to be overcome (See p 50)

Definitions of job-related incidents and other data inputs must be improved, and incompatibilities in existing agency reporting systems must be remedied. Otherwise, the new system will not avoid past problems (See p 51)

Need for effective leadership role by OSHA

OSHA's leadership in improving Federal agency safety and health programs has been limited and needs to be strengthened (See p 54). The agencies are responsible for developing and implementing Federal agency safety and health programs. In the absence of effective leadership and guidance by OSHA, however, Federal agency programs are likely to continue to lack consistency and overall direction (See p 54)

Since passage of the act, OSHA has expended time and efforts emphasizing the importance of Federal safety and health programs. However, most of OSHA's activities have related largely to matters involving dissemination of information and planning of future efforts (See p 54)

At the time of GAO's review, OSHA had not established and issued regulations required by Executive

Order 11612 to assist heads of Federal departments and agencies in fulfilling their occupational safety and health responsibilities (See p 56)

OSHA has evaluated only a few Federal safety and health programs to determine whether Federal departments and agencies are complying with the act and the Executive order. Consequently, OSHA does not know whether Federal employees are assured of the required safe and healthful working conditions (See p 56)

RECOMMENDATIONS TO THE
SECRETARY OF LABOR

The Secretary of Labor should direct OSHA to take a stronger leadership role in

- Preparing and issuing regulations to further assist and guide the agencies in developing their safety and health programs
- Developing a more aggressive and expanded evaluation and inspection program to insure that Federal agencies are making adequate efforts to provide safe and healthful workplaces
- Continuing to work with Federal agencies to resolve the problems with definitions and to make its new reporting system more compatible with the agencies' systems

- Assisting Federal agencies in developing a system to insure that qualified safety engineers and industrial hygienists inspect Federal workplaces and in making comprehensive surveys of their workplaces to determine the specific actions and estimated costs needed to bring the agencies in compliance with the act (See p 60)

AGENCY ACTIONS AND UNRESOLVED ISSUES

The Department of Labor advised GAO that it concurred generally with all the recommendations and that OSHA had taken or planned to take various actions along the lines suggested by GAO (See p 60)

MATTERS FOR CONSIDERATION
BY THE COMMITTEE

In view of the number and severity of the violations of safety and health standards noted during our limited inspections and the need to strengthen safety and health programs in many agencies, we recommend that the Committee consider having the Occupational Safety and Health Act of 1970 amended to bring Federal workplaces under the inspection responsibility of OSHA. The inspections should supplement, and not replace, inspections by the agencies' own personnel

CHAPTER 1

INTRODUCTION

The President of the United States has stated

As the Nation's largest employer, the Federal Government has a special obligation to set an example for safe and healthful employment. It is appropriate that the Federal Government strengthen its efforts to assure safe and healthful working conditions for its own employees.

Safety programs are not new in the Federal Government, although their status has been elevated by the Occupational Safety and Health Act of 1970 (84 Stat 1590) and Executive Order 11612, dated July 26, 1971. The act, passed in December 1970 and effective in April 1971, was to insure, to the extent possible, that every individual be provided with safe and healthful working conditions.

Under section 19 of the act, the Federal safety program requirements apply to approximately 120 Federal departments and agencies, ranging in size from the three-member Delaware River Basin Commission to the Department of Defense with a civilian work force of over a million. About 3 million civilian employees in about 5,000 different occupations are covered.

No figures are available on the number of workplaces. As examples, however, the Postal Service employs about 700,000 persons in about 40,000 locations and the Department of Labor employs about 13,000 in about 480 locations.

The Department of Labor reported that the Federal employees' injury frequency rate was 6 per million employee-hours worked in 1971 (it was 6.6 in 1970) and that in 1971 the Federal work force suffered about 37,000 disabling injuries and 255 fatalities. (See app. II for a list of selected agencies and injury rates.)

The Department of Labor singled out five categories of major causes of disabling injuries within Federal agencies.

- Slips, trips, and falls.
- Materials handling
- Struck by or against objects.
- Motor vehicle accidents.
- Fire.

The Department of Labor also named other areas of concern and categories, such as general office work, custodial cleaning, laboratory safety, small boat safety, personnel error, and hazardous material control

The Department of Labor estimates that the 37,000 injuries will cost \$118 million for compensation and medical expense alone. No accurate estimate is available on costs for property damage, however, the Department estimates that such costs are somewhere between a quarter and a half billion dollars annually.

CREATION OF THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

The Congress, finding that the number and severity of work-related injuries and illnesses were resulting in ever-increasing human suffering and economic loss despite efforts of employers and the Federal Government to combat this trend, passed the Occupational Safety and Health Act of 1970

The purpose of the act is to be accomplished by (1) authorizing enforcement of occupational safety and health standards developed under the act, (2) assisting and encouraging the States to insure safe and healthful working conditions, and (3) providing for research, information, education, and training in occupational safety and health

The act not only covers the approximately 3 million Federal Government civilian employees, but also about three-fourths of the employees in the private sector, or almost 60 million employees in about 5 million establishments. The act provides that States submitting occupational safety and health programs must provide protection for State and local government employees. There are currently about 10 million such employees.

The Secretary of Labor was given responsibility for administration of the Occupational Safety and Health Act. He delegated this responsibility to the Assistant Secretary of Labor for Occupational Safety and Health, a position

authorized under the act, by creating on April 28, 1971, the Occupational Safety and Health Administration (OSHA) OSHA is a decentralized organization with two-thirds of its manpower located in 10 regional offices, 49 area offices, and two maritime district offices, in major cities across the Nation

ESTABLISHMENT OF STANDARDS

Section 6 authorizes the Secretary of Labor to establish and enforce mandatory occupational safety and health standards to insure safe and healthful working conditions

On May 29, 1971, OSHA issued its initial standards package which incorporated (1) standards promulgated under the Construction Safety Act of April 24, 1971, (2) maritime standards from the Longshoremen's and Harbor Workers' Compensation Act, (3) established Federal standards from the Walsh-Healey Act, and (4) national consensus standards developed by the American National Standards Institute and by the National Fire Protection Association

After the initial standards package was promulgated, employers not previously covered by existing statutes, such as the Walsh-Healey Act, were given 90 days to familiarize themselves with the standards and to correct existing safety and health hazards At the end of this period (August 27, 1971), the standards became effective.

The Act gives OSHA overall responsibility but clearly places the burden of reducing occupational safety and health injuries and illnesses on employers, including Federal agencies

FEDERAL AGENCY SAFETY AND HEALTH PROGRAMS AND RESPONSIBILITIES

Section 19 provides that the head of each Federal agency will be responsible for establishing and maintaining an effective and comprehensive occupational safety and health program which is consistent with the standards promulgated under section 6 The act requires that the head of each agency shall (after consulting with employee representatives)

- Provide safe and healthful places and conditions of employment
- Acquire, maintain, and require the use of safety equipment, personal protective equipment, and devices reasonably necessary to protect employees.
- Keep adequate records of all occupational accidents and illnesses for proper evaluation and necessary corrective action.
- Consult with the Secretary of Labor on the form and content of records
- Report annually to the Secretary of Labor on occupational accidents and injuries and the agency's program.

Section 19 requires the Secretary to submit to the President a summary or digest of reports submitted to him by the Federal agency heads with his evaluation and recommendations. Section 19 also requires the President to transmit annually to the Congress a report on the activities of the Federal agencies.

To implement section 19, Executive Order 11612, which sets forth the criteria to be used by Federal agencies in establishing the required occupational safety and health programs, was issued on July 26, 1971. The Executive order requires that the head of each Federal department or agency should

- "(1) Designate or appoint a qualified official who shall be responsible for the management of the safety program within his agency.
- "(2) Establish (A) a safety policy, (B) an organization and a set of procedures, providing for appropriate consultation with employees, that will permit that policy to be implemented effectively, (C) a safety management information system, (D) goals and objectives for reducing and eliminating employee injuries and occupational illnesses, (E) periodic inspections of workplaces to ensure compliance with standards, (F) plans

and procedures for evaluating the program's effectiveness, and (G) priorities with respect to the factors which cause occupational injury and illness so that appropriate countermeasures can be developed

"(3) Correct conditions that do not meet safety and health standards "

The order also requires that the Secretary of Labor shall (1) by regulation, provide guidance to the heads of Federal departments and agencies to assist them in fulfilling their occupational safety and health responsibilities, (2) evaluate the safety programs of Federal departments and agencies annually, (3) with the consent of the head of the affected department or agency, conduct at headquarters or in the field such investigations as he deems necessary, (4) develop a safety management information system to accommodate the data requirements of the program, and (5) submit to the President by June 1 of each year an analysis of the information submitted to the Department of Labor by the heads of the Federal departments and agencies. This analysis shall include the Secretary's evaluation of each agency's program and his recommendations for improving safety programs throughout Federal agencies

The order also established a Federal Safety Advisory Council to advise the Secretary. This Council consists of 15 members appointed by the Secretary and includes representatives of Federal departments and agencies and of labor organizations representing employees. At least three members are to be representatives of such labor organizations.

OFFICE OF FEDERAL AGENCY PROGRAMS

The Office of Federal Agency Programs in OSHA is responsible for promoting, and assisting Federal agencies in establishing, safety and health programs. This Office's major function is to coordinate the safety and health activities of the Federal departments and agencies to insure compliance with section 19 and Executive Order 11612. A second function is to serve as the secretariat for the Federal Safety Advisory Council.

At the time of our review, the Office consisted of the Director, eight professional safety and health officers, and three secretaries

The major objectives of the Office have been to (1) establish a new and uniform system for recording and reporting occupational injuries and accidents that provides data comparable to that gathered from the private sector, (2) devise methods for evaluating the occupational safety and health activities of Federal departments and agencies annually, and (3) carry out special national safety and health programs in the Federal Government

NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH

To carry out the safety and health research activities authorized under the act, section 22 provides for the establishment of the National Institute for Occupational Safety and Health (NIOSH), Department of Health, Education, and Welfare. The most important research activity of NIOSH, which began operations on June 30, 1971, is to develop criteria for standards to be established by OSHA on toxic materials and harmful physical agents.

NIOSH is responsible for

- Developing criteria for the establishment of national occupational safety and health standards.
- Collecting and analyzing records and statistics on occupational safety and health necessary for promulgation of new or improved mandatory standards.

- Conducting (in-house as well as through grants and contracts) research or demonstrations relevant to occupational safety and health, including studies of behavioral and motivational factors.
- Making toxicity determinations on request by employers or employee groups.
- Publishing an annual list of all known toxic substances and the concentrations at which such toxicity is known to occur
- Conducting (in-house as well as through grants and contracts) educational and training programs aimed at providing an adequate supply of qualified personnel to carry out the purposes of the act.
- Conducting informational programs on the importance and proper use of adequate safety and health equipment

OCCUPATIONAL SAFETY AND HEALTH
REVIEW COMMISSION

The Occupational Safety and Health Review Commission is an independent agency established under section 12. It consists of three members appointed by the President and a staff selected by, and responsible to, the Chairman.

Its functions are adjudicatory. An employer may contest a citation or the proposed penalty issued by the Secretary of Labor, or an employee or a representative of employees may contest the time established by the Secretary for the abatement of a condition or practice which the Secretary had found to be violating the act. The Commission designates one of its hearing examiners to preside over the case

Following the hearing the Commission will issue an order affirming, modifying, or vacating the citation or proposed penalty. Orders of the Commission are final 30 days after issuance but may be appealed to the U.S. Court of Appeals.

SCOPE OF REVIEW

Our review was directed toward determining OSHA's leadership role in assisting Federal agencies to develop and maintain occupational safety and health programs and whether Federal agencies had established such programs in compliance with the act and the Executive order. Our review was made at OSHA headquarters in Washington, D.C., and at the Washington headquarters of 12 agencies--the General Services Administration, the Government Printing Office, the Postal Service, and the Veterans Administration and at the Departments of Commerce, Health, Education, and Welfare, the Interior, Justice, Labor, Transportation, the Treasury, and State

We reviewed the legislative history of the act and OSHA's procedures for implementing the act. We examined documents, reports, and records at OSHA headquarters and at the 12 agencies. We also inspected employee workplaces in the Washington, D.C., area at four of the 12 agencies for compliance with safety and health standards of OSHA. A professional safety engineer and an industrial hygienist on loan from OSHA assisted us on these inspections.

In addition, we sent questionnaires to 49 Federal departments and agencies--including the 12 mentioned above--requesting information on their progress in developing safety and health programs. We validated selected data furnished by the agencies. We selected the 49 agencies on the basis of (1) whether they had 1,000 or more employees as of December 31, 1971, or (2) whether they had reported to the Office of Federal Employees Compensation, Department of Labor, employee accidents resulting in compensation payments during calendar years 1970 and 1971. (See app II for a list of the 49 departments and agencies.)

CHAPTER 2

COMPARISON OF ENFORCEMENT

AND INSPECTION PRACTICES

APPLIED TO PRIVATE BUSINESS WITH THOSE

APPLIED TO FEDERAL AGENCIES

OSHA's enforcement and inspection practices differ significantly between private businesses and Federal agencies. For private businesses OSHA enforces compliance with safety and health standards through inspections and penalties authorized by the act. The act, however, provides that inspections of Federal agency workplaces may be performed only with the consent of the agencies.

OSHA ENFORCEMENT APPLIED TO PRIVATE BUSINESSES

The act describes in detail the powers of the Secretary of Labor to enforce compliance by private businesses. These powers include the right to make unannounced inspections of any covered workplace and to propose penalties for violations. In fiscal year 1972, OSHA made 32,700 inspections, cited 102,860 violations, and proposed \$2.3 million in penalties. The establishments inspected employed about 6 million persons.

Inspections are made by a corps of OSHA compliance safety and health officers and industrial hygienists in 10 regional offices, 49 area offices, and two maritime district offices located throughout the country. As of August 31, 1972, OSHA had a total of 513 such inspection officials in the field.

OSHA provides private businesses with written notices of alleged violations. Although immediate abatement may be required, in most instances abatement periods of up to 30 days are granted. A longer period may be granted when, for example, extensive structural changes are necessary.

Private businesses may contest the citation, the length of the period for abatement, and/or the amount of penalty. OSHA sends the notices of the contestation to the

Occupational Safety and Health Review Commission, which holds a hearing on the case and issues an order affirming, modifying, or vacating the citation or proposed penalty.

OSHA inspectors made followup inspections to evaluate corrective actions taken by employers on hazards disclosed in the original inspections. Followup inspections are mandatory in such situations as

- when a court has issued a restraining order in an imminent danger situation and
- when citations for serious, willful, or repeated violations have been issued

OSHA ENFORCEMENT APPLIED TO FEDERAL AGENCIES

The act does not authorize the Secretary of Labor to enforce Federal agency compliance with safety and health standards, however, it does give him access to Federal agencies' records on occupational accidents and illnesses. Executive Order 11612 authorizes the Secretary to evaluate the safety and health programs of Federal agencies, and, with the consent of the agency head, the Secretary may conduct workplace inspections.

At the time of our review, OSHA had evaluated only the published safety programs at the headquarters of the Departments of Agriculture and Commerce, the Veterans Administration, and the General Service Administration. OSHA had inspected only two of the Federal workplaces in federally occupied buildings in Washington, D C , both of which were occupied by the Department of Labor. Many instances of non-compliance with the OSHA standards were found in both buildings.

Because inspections for Federal agency compliance with OSHA standards were being left to the agencies' own discretion, we asked 49 agencies about their inspection practices.

FEDERAL AGENCY INSPECTION PRACTICES

Four of the 49 agencies surveyed stated that they had no workplace inspection programs. The workplace inspections

at the other 45 agencies varied from a walk-through by an agency safety official to an inspection which was part of a review involving matters unrelated to safety. Typically, agency personnel made inspections as part-time, collateral duties. Three of the 49 agencies surveyed used only full-time inspectors, 15 used full-time and part-time inspectors, and 27 used only part-time inspectors.

Forty of the 45 agencies having inspection programs documented violations of safety and health standards, and 34 of the 40 maintained some type of record of their inspections. Eleven agencies did not maintain inspection records routinely although six of these did document violations.

The time allowed for officials responsible for safety and health violations to take corrective action varied widely.

<u>Time allowed for correction</u>	<u>Number of agencies</u>
No time specified	35
Required immediately	2
1 day	3
1 week	2
1 month or more	3
No inspection program	<u>4</u>
Total	<u>49</u>

The time between initial and followup inspections to determine if corrective action had been taken also varied.

<u>Time allowed for followup</u>	<u>Number of agencies</u>
No time specified	26
Required immediately	1
1 day	3
1 week	7
1 month or more	8
No inspection program	<u>4</u>
Total	<u>49</u>

A number of agencies advised us that the time allowed for implementing corrective actions depended on the seriousness of the problems.

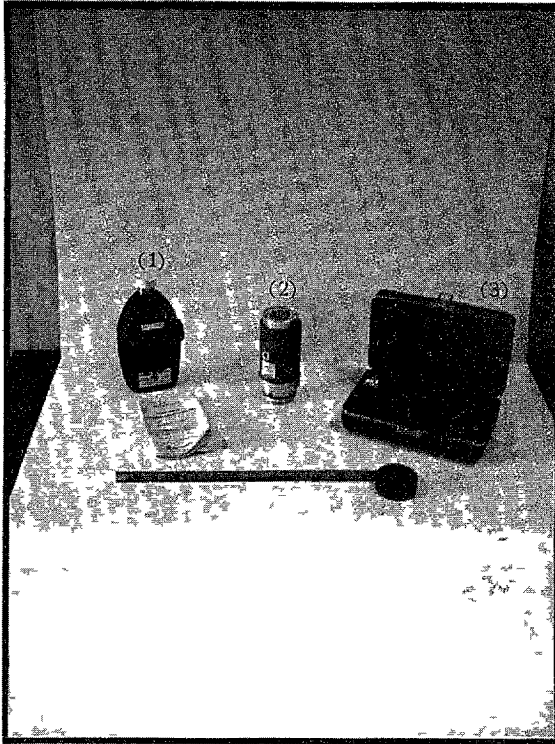
Inspections of Federal agencies tend to concentrate on safety hazards rather than health hazards. Safety hazards can usually be detected by observation, but health hazards often can be detected only by the use of technical equipment by a trained operator, such as an industrial hygienist.

Equipment used by OSHA inspectors to test for health hazards in private businesses is shown on pages 17 and 18. Similar equipment is generally needed to adequately inspect for health hazards in most workplaces--including those used by Federal agencies.

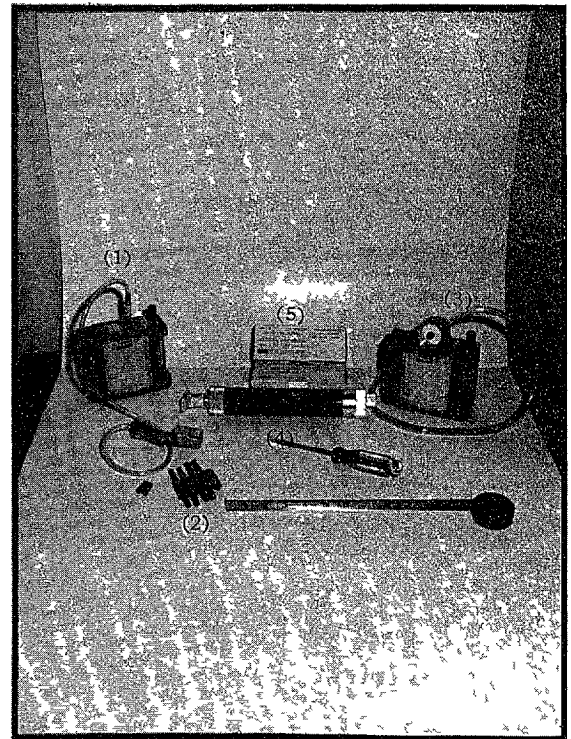
Safety officials of many of the Federal agencies we surveyed did not possess such equipment. Many of the officials who had industrial-type operations in their agencies advised us that, to the best of their knowledge, a trained industrial hygienist had not recently inspected agency workplaces.

In summary, most Federal agencies we surveyed perform some kind of safety inspections of their workplaces. These are generally conducted as collateral duties, and agency practices on followup and corrective actions varied widely. There is no professional inspection program in the Federal Government similar to OSHA's program for inspecting private businesses.

EQUIPMENT USED BY OSHA INSPECTORS TO DETECT HEALTH HAZARDS IN WORKPLACES

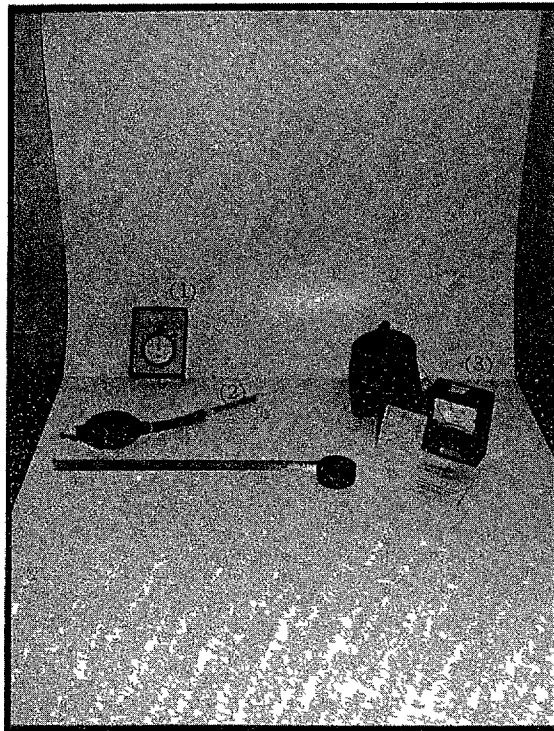


Above Sound Level Testing Equipment
(1) Sound Level Meter, (2) Calibrator,
and (3) Adaptor in carrying case



Above Air Contaminants Testing Equipment
(1) Personal Monitor, (2) Charcoal Tubes
used with Personal Monitor for organic
vapor testing, (3) Personal Monitor with
Membrane Filter used for particulate
sampling, (4) Hand Pump, and (5) Gas
Indicator Tubes used with Hand Pump
for sampling for ozone, carbon monoxide,
and other contaminants

**EQUIPMENT USED BY OSHA INSPECTORS TO DETECT HEALTH
HAZARDS IN WORKPLACES**



Above Ventilation Testing Equipment
(1) Stop Watch, (2) Smoke Tube,
and (3) Velometer for testing air
changes in ventilating hoods

CHAPTER 3

NONCOMPLIANCE WITH OSHA STANDARDS

We found many instances of noncompliance with OSHA safety and health standards during our inspections of workplaces of four Federal agencies in the Washington, D.C., area. We selected these workplaces because they included industrial-type operations and general office-type areas. Except that the inspections were limited to selected areas and activities, the inspections were similar to inspections by OSHA of private business workplaces.

We noted about 200 instances of noncompliance, and about 50 of the instances were sufficiently severe that, had they been found in private businesses, the businesses would have been subject to monetary penalties assessed by OSHA.

We have reported separately the details of our inspections to each agency involved so that appropriate corrective action can be taken. Examples of the findings are discussed below and relate to mechanical, electrical, fire, housekeeping, air, and workplace environment hazards.

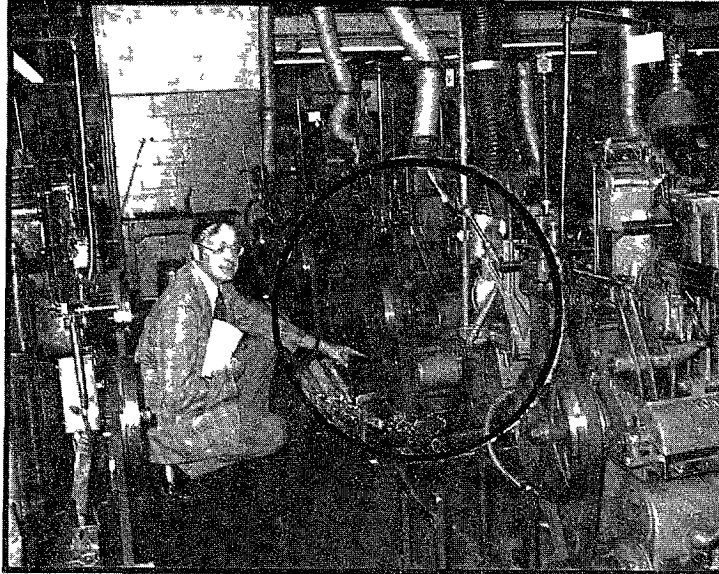
MECHANICAL HAZARDS

Mechanical hazards which could cause employees to be seriously injured existed in all four agencies we inspected. Mechanical hazards were typically associated with machinery, such as printing presses which were not equipped with proper guards for their drivebelts and idler wheels. Various cutting and grinding machines were also hazardous.

Drivebelts and idler wheels

Many machines, such as the monotype machine pictured below, were unsafe because the drive belts and idler wheels were not guarded. Failure to provide guards is a violation of OSHA standards which require all exposed drivebelts, drive wheels, and idler wheels to be properly guarded.

MONOTYPE MACHINES

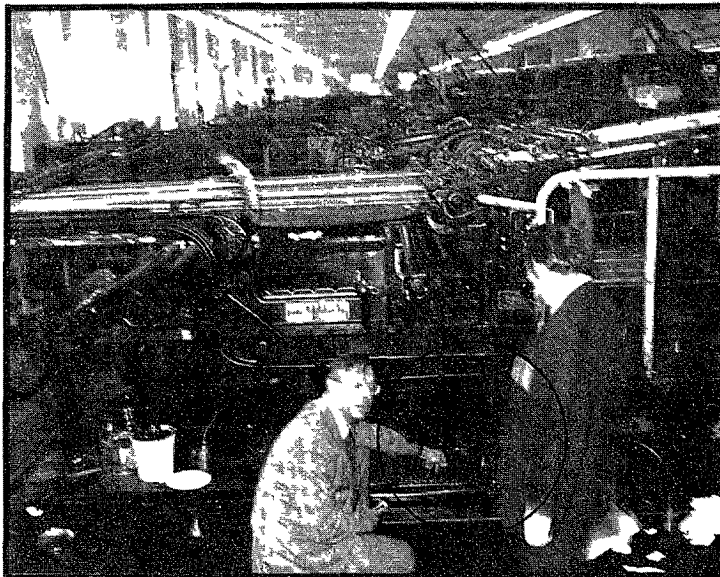


A-1 Machine drive belts and idler wheels without proper guards

Printing press

Such machines as the printing press pictured below could cause an employee coming in contact with the exposed pinch points on the connecting rods to be seriously injured. The lack of guards on such pinch points violates OSHA standards which require that connecting rods be suitably guarded.

PRINTING PRESS

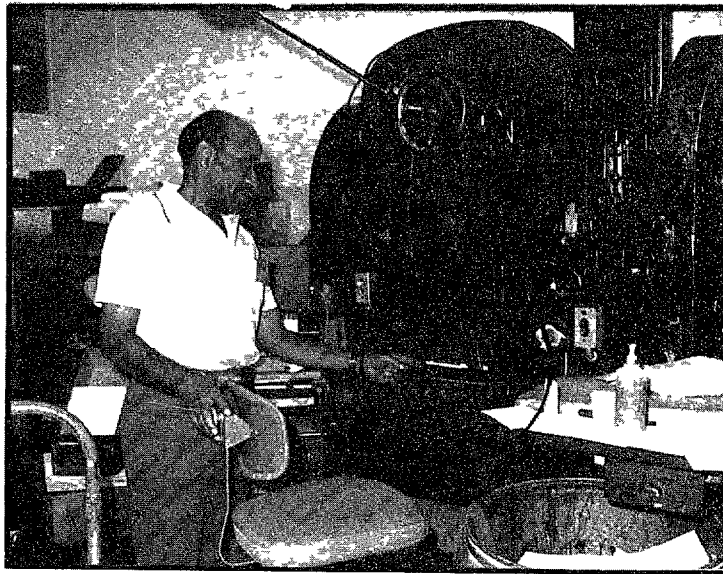


A-2 Unguarded connecting rods

Embossing press

The embossing press pictured below is unguarded at the point of operation. As the employee places his work under the press, he could seriously injure his fingers or hand. OSHA standards require that the point of operation on machines whose operation exposes an employee to injury be guarded.

EMBOSSING PRESS



A-3 Unguarded point where press embosses material

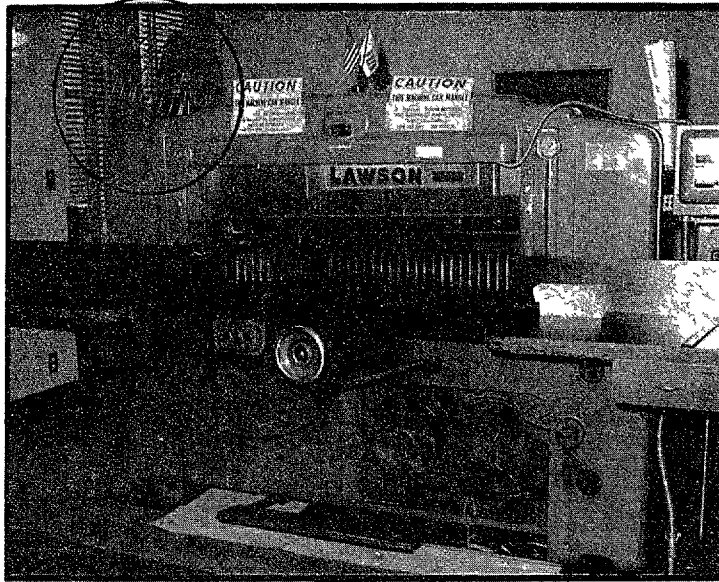
Cutting machines

Various types of paper-cutting machines used in printing operations were dangerous and violated OSHA standards. For example, the guillotine papercutter pictured on page 22 was unsafe because the two-handed safety device was not functioning. A finger or fingers could have been severed. OSHA standards require that adequate safety devices be provided to protect employees from injury in danger zones.

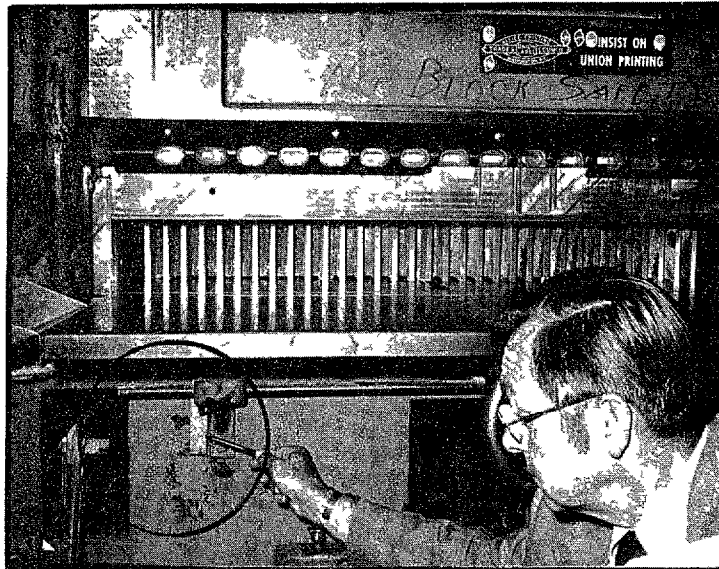
In the same picture, an improperly guarded fan is shown beside the papercutter. OSHA standards require all fans less than 7 feet above the floor to have blade guards with openings no larger than one-half inch. Without such guards, an employee could be seriously injured if he came in contact with the fan.

In picture A-5 below, an employee apparently inserted a wooden wedge behind the safety control device on another guillotine papercutter. By negating this safety control device, the employee's hand is exposed to severe injury. Bypassing the safety control violates OSHA standards. In this particular case, agency officials advised us that the same violation had occurred on this machine in the past.

GUILLOTINE PAPER CUTTERS



A-4 Inoperable safety device in paper cutter and fan with improper blade guard



A-5 Blocked safety device on paper cutter

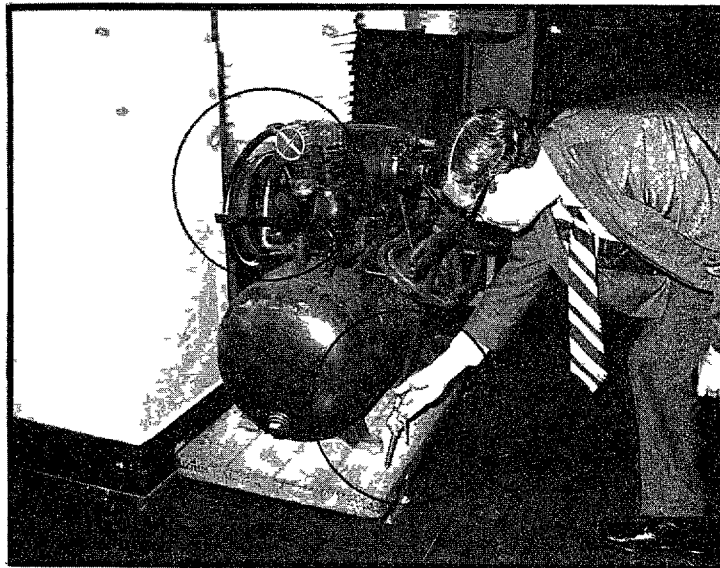
Air compressor

OSHA standards require that V-belts be properly guarded and that air pressure used for cleaning be reduced to less than 30 pounds per square inch. Numerous air compressors were unsafe because these requirements had not been met.

On the air compressor pictured below, the V-belt was unguarded. If an employee came in contact with the exposed V-belt, he could be seriously injured. Also, the air line pressure exceeded the allowable 30 pounds per square inch. Eyes could be injured from flying particles during cleaning operations because of the excessive pressure.

Although not visible in the picture, an exposed electrical wire was not properly connected to its fittings, causing a potential fire or shocking hazard.

AIR COMPRESSOR



A-6 Unguarded V-belt also, excessive air line pressure

ELECTRICAL, FIRE, AND HOUSEKEEPING HAZARDS

Electrical

Many wall outlets in the four agencies we inspected were not covered and others were overloaded. Electrical panels were exposed in some work areas and many electrical wires were frayed

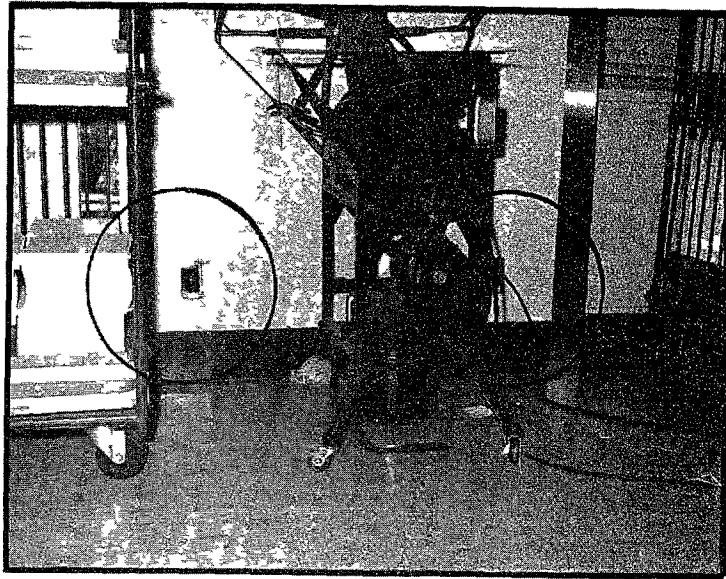
The picture on page 25 shows two uncovered electrical wall outlets, one of which was taped to the wall, exposing employees to electrical shock. OSHA standards require receptacles to be properly secured and covered

In another agency a wall outlet to which numerous extension cords were connected was overloading the circuit. (See picture A-8 on p 25.) Also, the equipment connected to the outlet was not grounded. Employees were therefore exposed to a serious electrical shock.

A high-voltage electrical panel next to a copying machine and exit was not covered, exposing employees using the machine to electrocution or severe burns in the event of malfunction or accident. We were informed that the panel had been uncovered for several months. (See picture A-9 on p. 26.) OSHA standards require that all such panels be covered.

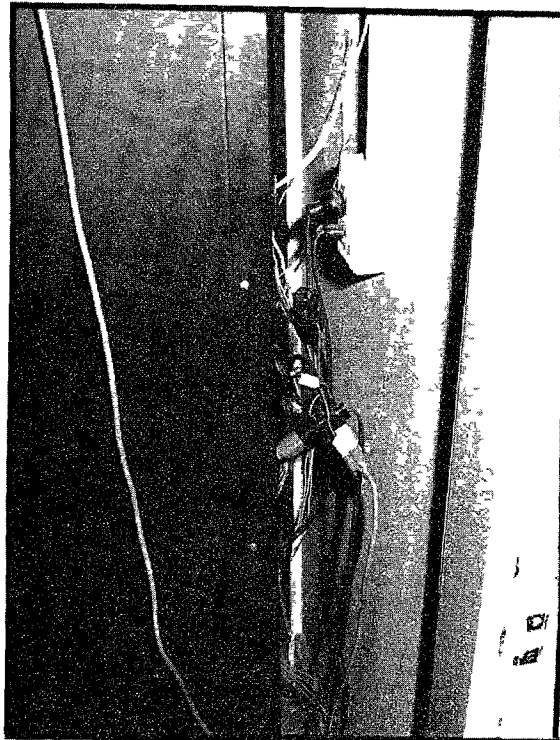
Electrical wires exposed in a potentially wet area are shown on page 26. Employees could be shocked from exposed electrical wires if the sprinklers were activated. OSHA standards require electrical wires in potentially wet areas to be weatherproof.

ELECTRICAL HAZARD

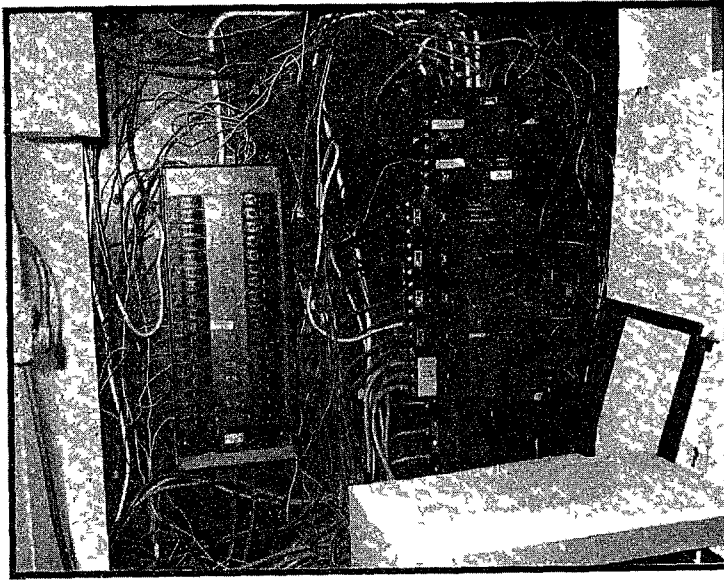


A-7 Two wall outlets uncovered and one secured with a piece of tape

ELECTRICAL HAZARDS

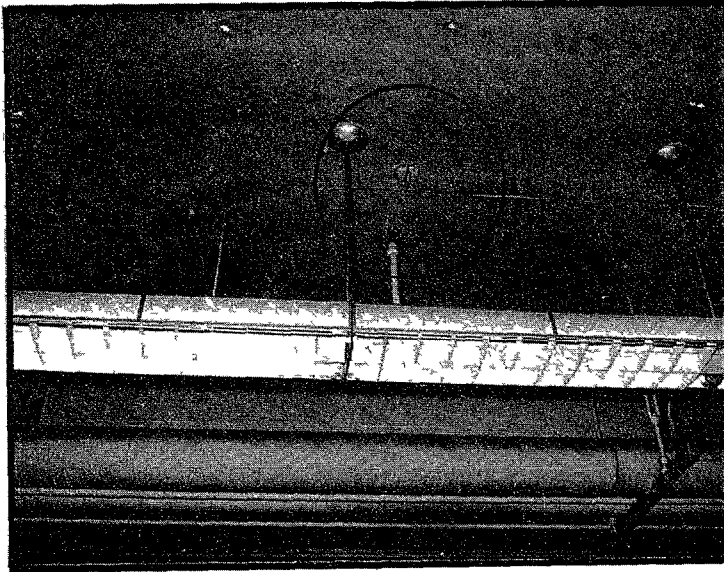


A-8 Misuse of extension cords



A-9 Uncovered high voltage electrical panel

ELECTRICAL HAZARDS



A-10 Exposed electrical wires in potentially wet area

Fire

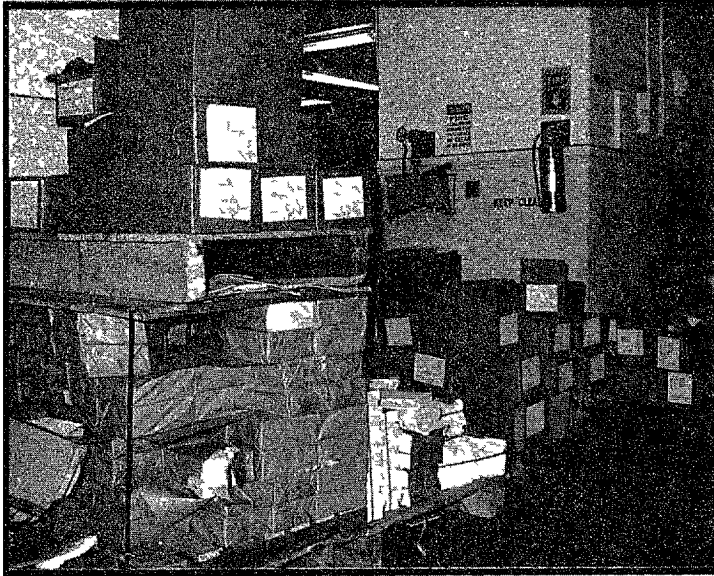
Fire-fighting equipment was not always mounted properly, periodically inspected, available, or accessible, and a potential for explosion existed in several solvent storage areas.

Picture A-11 on page 28 shows that a fire extinguisher and fire hose were mounted above the heights allowed by OSHA standards. Also, we found no indication that extinguishers and hoses had been periodically inspected as required. In the event of a fire, the route to the fire exit (not shown in the picture) and access to fire-fighting equipment were blocked.

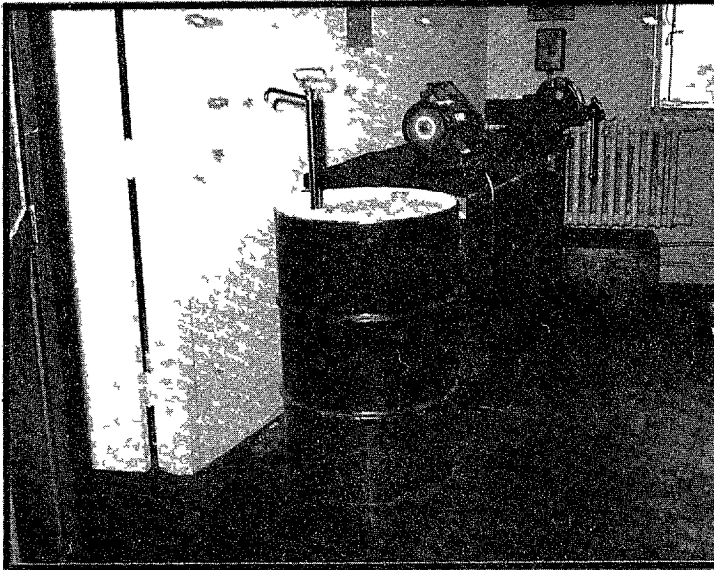
Isopropyl alcohol, a highly explosive and flammable mixture, was improperly stored at one agency. (See picture A-12, p 28) An unmarked and ungrounded drum with an open drain allowing fumes to escape was standing near several ignition points, including sparks from a grinding operation and from an air compressor motor (not shown in the picture). OSHA standards require that such material be stored in cabinet or storage rooms.

In another agency sprinkler heads in a paper storage area were inoperable because openings had been painted closed. (See picture A-13 on p. 29) OSHA standards require sprinklers to be properly maintained in case of a fire.

FIRE HAZARDS

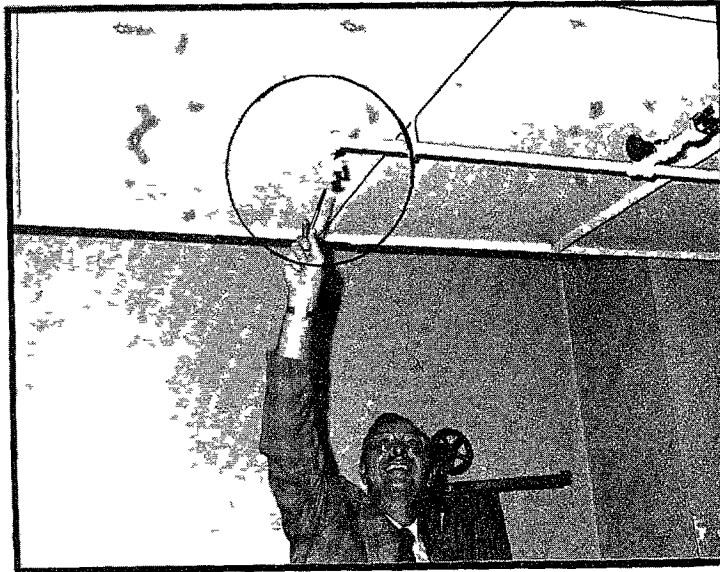


A-11 Blocked aisles and inaccessible fire fighting equipment



A-12 Improper storage of flammable mixture

FIRE HAZARDS



A-13 Painted sprinkler head inoperable

Housekeeping

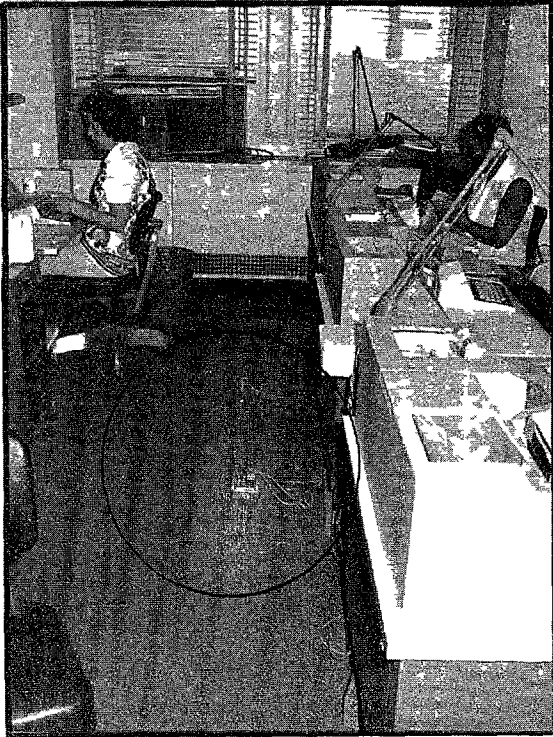
In one agency electrical outlets and wiring were in a walk area. OSHA standards require aisles and passageways to be kept clear of obstructions to prevent tripping. (See picture A-14 on p. 31.)

In the same agency some gas bottles appearing to contain oxygen and acetylene, which should not be stored together, were untagged, unsecured, or uncapped. (See picture A-15 on p. 31.) Fire or serious injury could occur if the bottles were to fall or the mixture were to be dispersed into the atmosphere. OSHA standards require compressed gas cylinders to be properly tagged, capped, and stored and oxygen and acetylene to be properly separated.

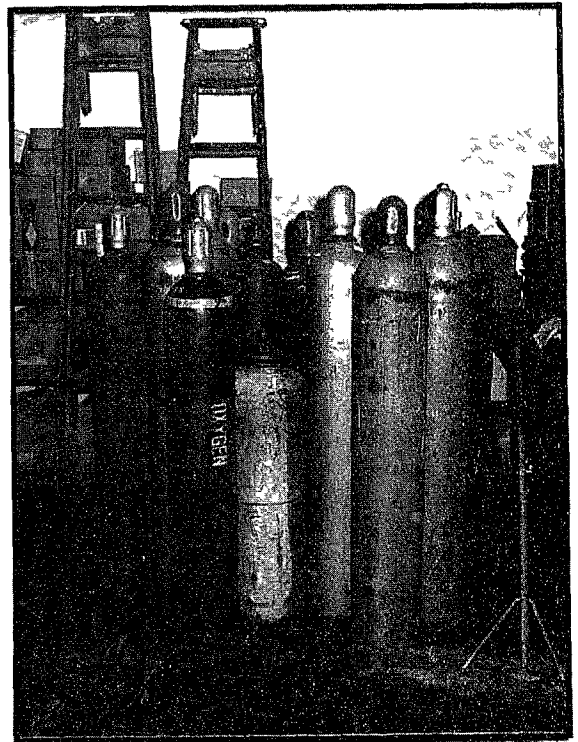
Combustible documents were stored in a manner which created a fire hazard. (See picture A-16 on p. 32.) OSHA standards require all storerooms to be kept clean and orderly.

The monotype machine in picture A-17 on page 32 was improperly guarded to prevent employees from being severely burned by a vat of molten metal which extended into a doorway and a walkway. OSHA standards require that such hazards be guarded to prevent injury to employees.

HOUSEKEEPING HAZARDS



A-14 Electrical outlets and wiring in walk area used by employees

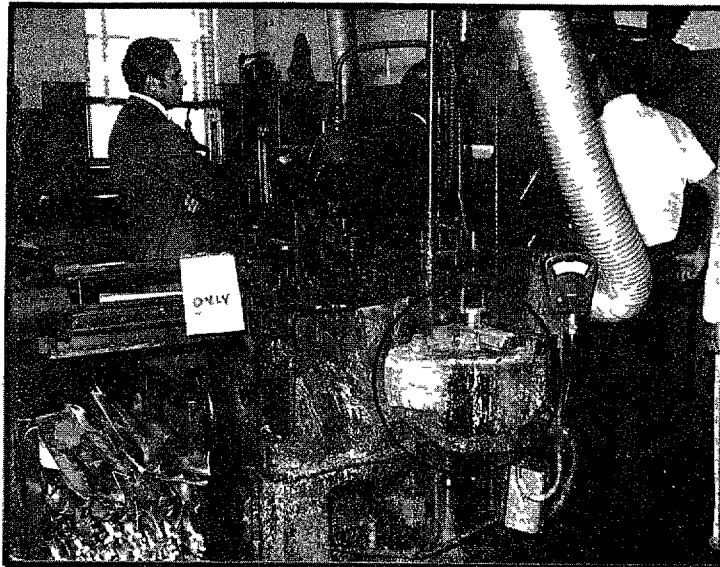


A-15 Untagged, unsecured, and uncapped compressed gas cylinders

HOUSEKEEPING HAZARDS



A-16 Improper storage of documents



A-17 Vat of molten metal not properly guarded

AIR AND WORKPLACE ENVIRONMENT HAZARDS

At three of the four agencies, noise levels were above those specified in OSHA standards. Noise problems in the workplaces were associated with printing presses, cutting machines, and some computer equipment.

In two agencies we found ozone--a highly toxic material--in the workplace air in excess of allowable OSHA standards. Ventilation problems existed in all four agencies.

Noise

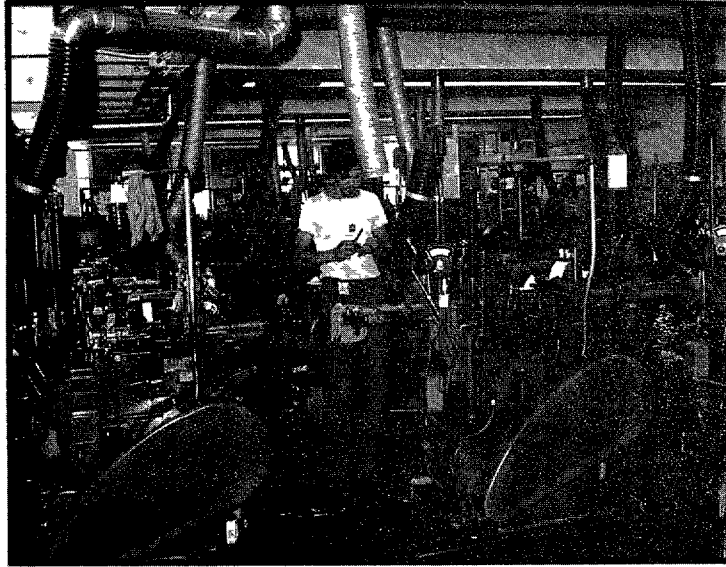
Agencies having workplaces where employees are exposed to noise should, according to OSHA standards, maintain continuing and effective hearing conservation programs. Such programs would include periodic noise surveys at workplaces and periodic audiometric examinations to evaluate the effectiveness of the program. A series of periodic audiograms--measuring the hearing capability of each exposed worker--and periodic noise surveys protect the workers' health and the Government from compensation claims for hearing loss. Only one of the three agencies having noise problems had begun making periodic audiograms of exposed workers.

Two of the three agencies had made noise surveys in the past, but only one had begun a hearing conservation program. All three agencies need to do more to protect their workers from noise hazards.

Following are examples of some of the noise problems we found

The sound level at workers' stations around monotype casting machines in one agency was between 93 to 96 decibels. (A decibel is the unit used to measure sound.) OSHA standards permit exposure of 90 decibels for an 8-hour day. Workers told us that the noise was continuous over their full 8-hour shift. Exposure to sound levels of 93 to 96 decibels, at that duration, may be expected to impair the hearing of 35 to 40 percent of the workers exposed. (See picture below.)

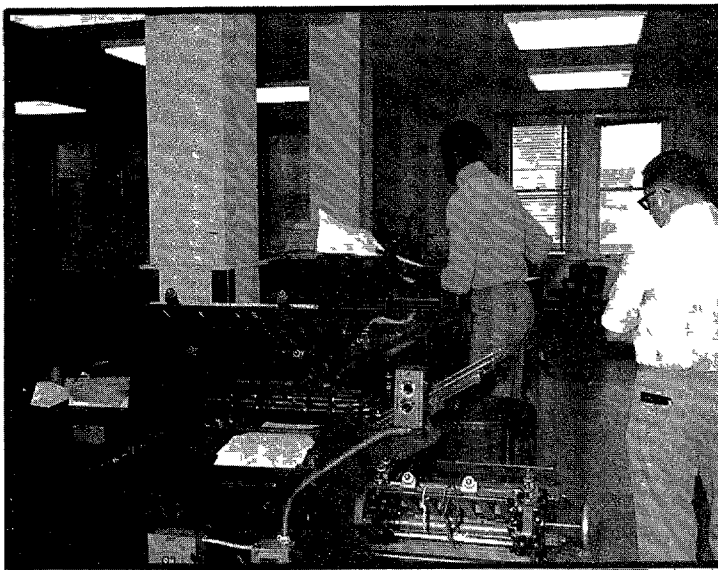
MONOTYPE MACHINES



A-18 Area in which excessive noise level was evident when machines shown were in operation

The paper-folding machines shown below were operating at 92 decibels in another agency. When other noise-producing machines in the same workroom and the paper-folding machines were both operating, an even higher decibel level was produced.

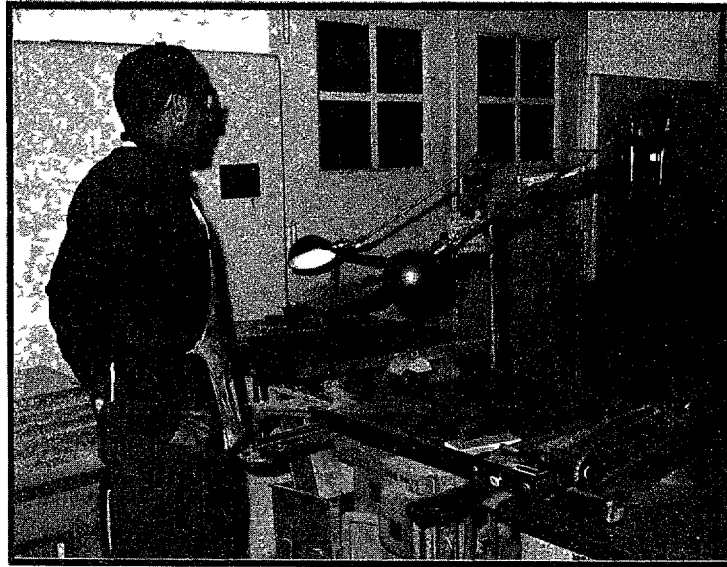
PAPER FOLDING MACHINE



A-19 Area in which excessive noise was evident when machine shown was in operation

In a shop which had both wood and metal working equipment, a saw, which we were told was operated by the same employee for as long as 5 hours a day, was producing readings of about 100 decibels. (See picture below.) This violates OSHA standards which limit employee exposure to sound levels above 100 decibels to only 2 hours a day.

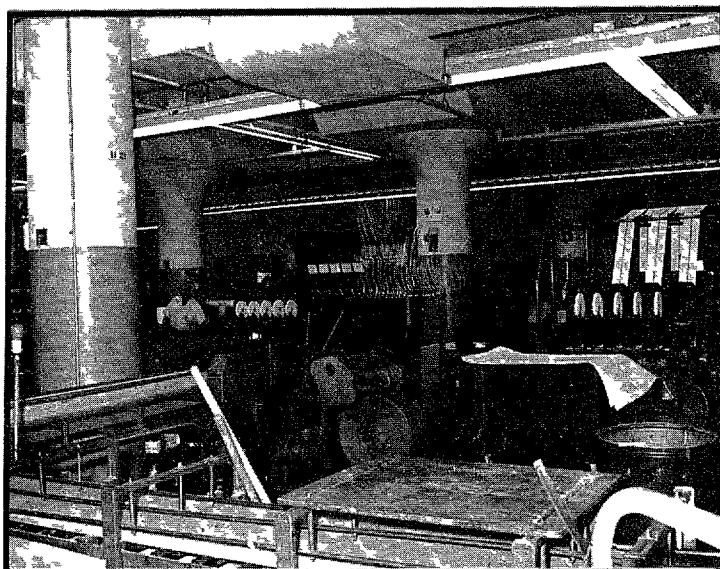
METAL SAW



A-20 Area in which excessive noise level was evident when saw shown was in operation

From 98 to 102 decibels were measured at worker stations in a printing-press operation illustrated below. Workers in this particular operation were provided with ear protective equipment. OSHA standards indicate that ear protective equipment should be used only when the noise problem cannot be eliminated by engineering changes or the exposures cannot be reduced by administrative controls (such as re-scheduling workers into shorter durations of exposure).

POST CARD PRINTING PRESS



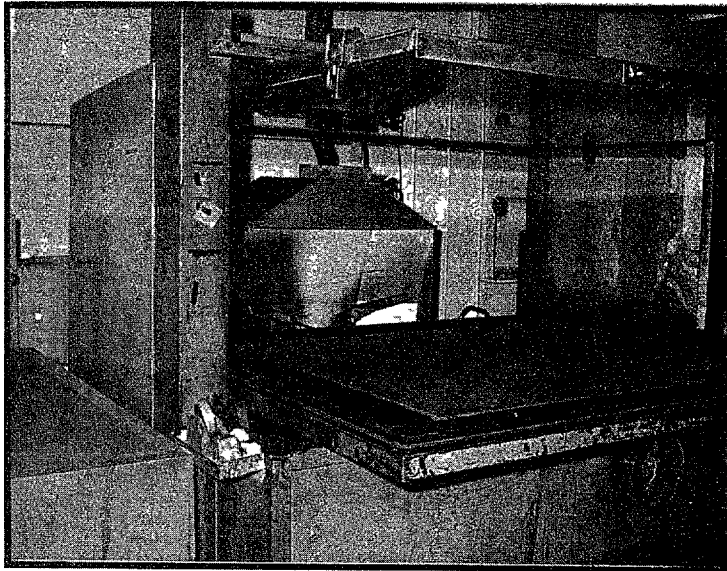
A-21 Area in which excessive noise level was evident when press shown was in operation

Air contaminants

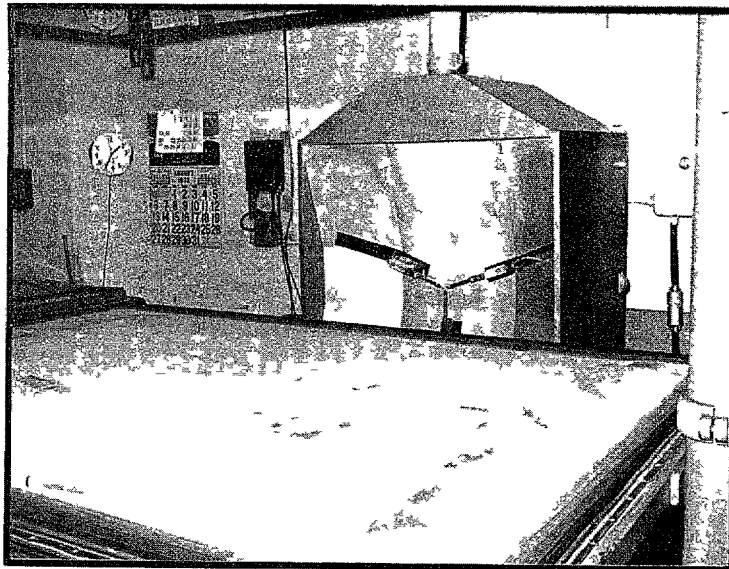
In two agencies we found ozone in the workplace air in excess of allowable OSHA standards. In an offset plate-making room, an arc lamp was exposing workers to five to seven times the permitted level of ozone. (See picture A-22 on p. 37.) In another agency a carbon arc lamp in a photo process plating room was exposing workers to ozone at 10 times the permitted level. (See picture A-23 on p. 37.)

In these instances corrective action could be taken by replacing the lamps with other types or by providing better ventilation for the existing lamps.

CARBON ARC LAMPS



A-22 Lamp which causes excess ozone when in operation



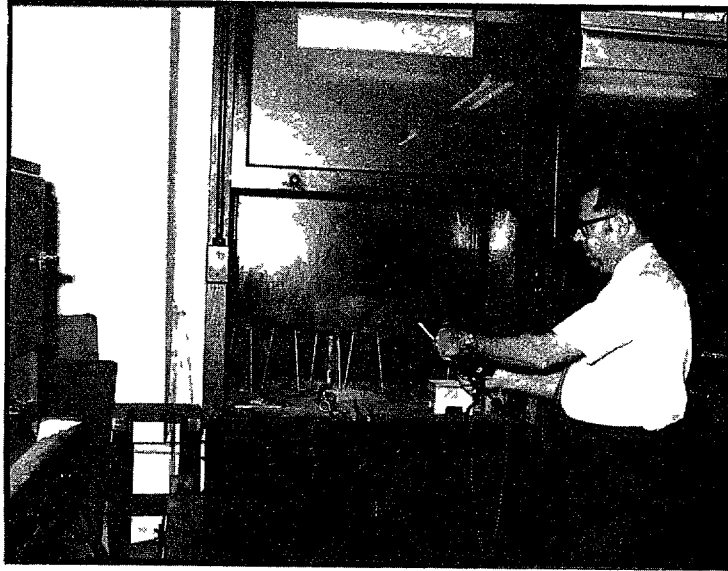
A-23 Lamp which causes excess ozone when in operation

We found ventilation problems in all four agencies. In an analytical chemistry lab in one agency, ventilation measured by hood face velocity should have been 100 feet or more per minute but measured less than 50 feet per minute. (See picture A-24 on p 39)

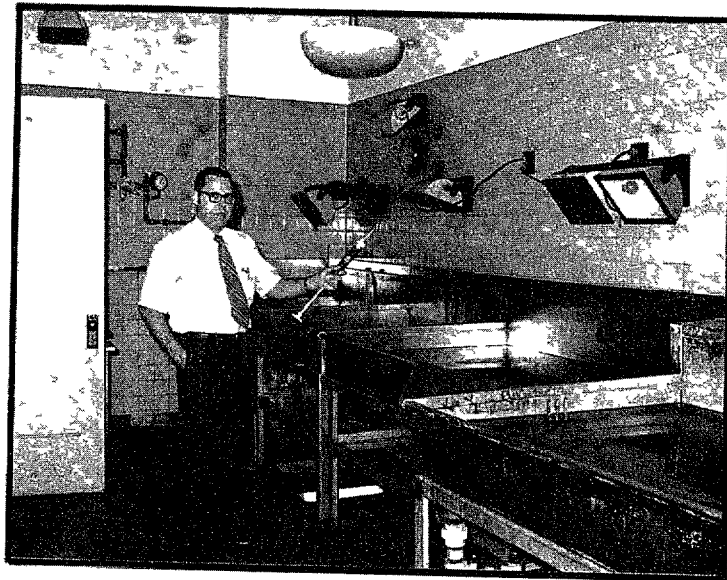
Air in a photographic darkroom in a second agency measured 10 parts per million of acetic acid content This is at the threshold limit value (maximum allowable concentration), and existing ventilation was not adequate for higher levels which would occur when concentrated acetic acid was used to mix fresh photo-developing solutions. (See picture A-25 on p. 39.)

At another agency the airflow velocity under the canopy-type hood in a platemaking room was negligible and may not have been sufficient to effectively control organic vapors in the room. (See picture A-26 on p 40) At a motor pool garage in the same agency, an overhead ventilation system was provided for exhaust fumes, but all except one flexible duct connection was missing. The absence of these ventilation connections can expose workers to gasoline exhaust fumes containing carbon monoxide and other noxious gases. (See picture A-27 on p. 40.)

VENTILATION PROBLEMS

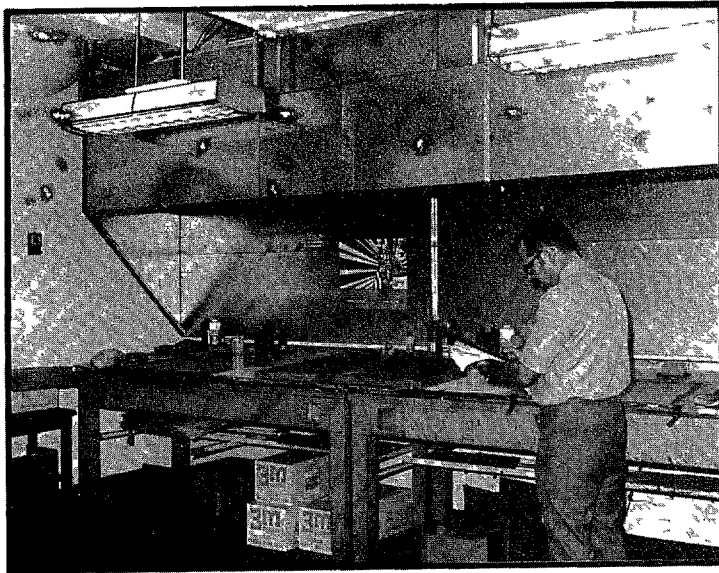


A-24 Analytical chemistry lab lacking proper ventilation

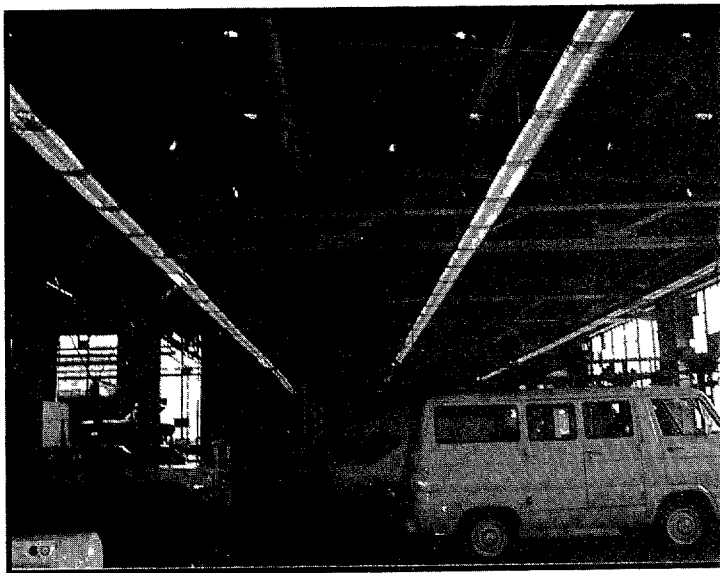


A-25 Photographic darkroom lacking proper ventilation

VENTILATION PROBLEMS



A-26 Plate making room lacking proper ventilation



A-27 Motor pool garage with ventilation ducts missing

TOXIC SUBSTANCES AND HARMFUL PHYSICAL AGENTS

Of the 49 Federal agencies we surveyed, 33 said either their employees were exposed to toxic substances or harmful physical agents above standard tolerances or they did not know whether the employees were so exposed. This is further indication of the need for inspections of Federal workplaces by industrial hygienists and other professionally trained safety and health personnel. The toxic substances and harmful physical agents were those which NIOSH had given priority attention, namely, noise, ultraviolet light, carbon monoxide, lead, trichloroethylene, asbestos, mercury, benzene, heat stress, arsenic, cadmium, silica, chromic-acid mist, fibrous glass, beryllium, cotton dust, and parathion

The nature of these agents and their harmful effects are described below.

- Noise Unwanted sound, generally exceeding 90 decibels, which may injure the hearing mechanism and cause emotional disturbance and distress.
- Ultraviolet light. Invisible rays generated during welding operations and work with laser and solar simulators. Ultraviolet light may inflame the eyes and burn the skin. Also, it may cause ozone to form which has a pungent odor and which may irritate the mucous membranes
- Carbon monoxide. Formed when carbon burns with an insufficient air supply. Inhalation may result in loss of brightness perception and fine coordination of ocular muscles, aching limbs, increased pulse rate, headache, nausea, vomiting, collapse, and death.
- Lead. Occupationally dangerous as both a dust and a gas. Inhalation may induce intoxication, headache, and weakness.
- Trichloroethylene. A chemical compound used as a degreasing solvent, cleanser, and thinner. Inhaled as a vapor, it may cause kidney and liver injury.

- Asbestos. A fibrous mineral used in the manufacture of tile and insulation and in construction. Inhalation may cause asbestosis, a respiratory disorder, and mesothelioma, a form of cancer.
- Mercury. A metallic element which is occupationally toxic as a vapor. Inhalation of vapors may cause psychic distress, tremors, and damage to the kidneys.
- Benzene. An inflammable liquid used as a solvent, degreaser, cleanser, and paint remover. Inhalation may cause dizziness, weakness, headache, nausea, chest pain, convulsions, coma, and death. Extended inhalation of benzene may cause cancer of the blood-forming organs and bladder tumors.
- Heat stress. A situation in which the body can no longer tolerate the existent temperature. Sweating, lassitude, dizziness, heat exhaustion, and heat stroke may result.
- Arsenic. An element used in herbicides and insecticides and also a waste product in the steel manufacturing process. As a gas or dust it may cause skin lesions, lung disease, and cancer of the mouth, esophagus, and urogenital tract.
- Cadmium. An element used in plating to prevent rust and in making alloys. Inhalation of cadmium fumes and dusts may produce metal fume fever or pulmonary edema.
- Silica. Quartz dust. Inhalation may cause silicosis, a disabling and sometimes fatal lung disease.
- Chromic-acid mist. A mist which may form during work with chromic acid and chromates. Inhalation may cause ulcerations, irritation of mucous membranes, and perforation of the septum.
- Fibrous glass. A fine dust formed during the manufacturing of fiberglass and the installation of fiberglass insulation. Inhalation of fibrous glass particles may irritate the nose and throat while contact alone may irritate skin and cause rashes.

- Beryllium. Inhalation of beryllium dust or vapor may cause damage to the liver and spleen, ulceration of open wounds, and acute and chronic pneumonitis which may cause death.
- Cotton dust. A dust found largely during the early stages of the manufacturing process during which cotton is prepared for use in finished products. Byssinosis, a chronic lung disease which may cause disability, may result from the inhalation of cotton dust over a period of time.
- Parathion An organic phosphate used in pesticides and insecticides. Inhalation may cause intoxication, abdominal pain, weakness, drowsiness, and possibly convulsion and coma.

Eighteen agencies responded that employees in their workplaces were exposed to one or more of these factors above standard tolerances. Fifteen agencies stated that they did not know if their employees were exposed to all the harmful factors. Distribution of agency responses is shown below.

	Number of agencies	
	<u>Reporting employees exposed above standard tolerances</u>	<u>Which did not know if employees are exposed</u>
Noise	17	5
Ultraviolet light	10	5
Carbon monoxide	10	4
Lead	8	4
Trichloroethylene	7	5
Asbestos	6	6
Mercury	6	6
Benzene	8	3
Heat stress	8	3
Arsenic	5	6
Cadmium	5	6
Silica	7	3
Chromic-acid mist	3	6
Fibrous glass	4	4
Beryllium	3	4
Cotton dust	3	4
Parathion	3	3

Ten of the 18 Federal agencies reporting exposure of their employees to these factors indicated that they had a protection program. The other eight did not indicate whether they were taking or considering any corrective action

We believe that the eight agencies, combined with those agencies which did not know if their employees were being exposed, should have an independent inspection of their workplaces by a professional industrial hygienist able to identify the incidence of such harmful factors and to eliminate these hazards or provide for adequate safeguards for employees when necessary.

CHAPTER 4

LACK OF CONSISTENCY AND DIRECTION IN

FEDERAL AGENCIES' SAFETY AND HEALTH PROGRAMS

The questionnaires sent to 49 Federal departments and agencies also requested information on their progress in developing safety and health programs in accordance with the act and the Executive order. We visited 12 of these agencies to discuss the safety program with agency officials. Of the 49 agencies, 46 stated that they had occupational safety and health programs of some kind.

Many such programs had been established prior to passage of the act. Some had been established for over 20 years, and one as early as 1934. Although most agencies had established programs prior to the act, many modified their programs as a result of the act. The existing programs, however, lack consistency and overall direction. Only one of the 12 agencies we visited had made a comprehensive survey to determine the specific actions and attendant costs required to comply with the act.

The 49 agencies reacted to the act in a variety of ways.

- Some agencies, generally those with programs which had existed for a number of years, made few changes. Most of the safety officials at the 12 agencies told us that they believed their agencies were complying with the act and that the act had caused only minor revisions to their programs.
- Three of the agencies reassessed their occupational safety and health programs and made changes. One agency established its first full-time safety officer. Another agency established a safety officer and a formal safety organization and published a safety and health handbook. The third agency made a comprehensive survey of its field installations to determine what actions were needed to comply with OSHA standards.
- A number of agencies either created occupational safety and health programs or added significant

elements to their existing programs. For example, seven agencies established their first formal safety organizations and five others established promotional and training programs.

There was much diversity among agencies' occupational safety and health program components in safety policies, safety organizations and procedures, surveys of workplaces, and dissemination of standards.

SAFETY POLICIES

Executive Order 11612 requires each Federal agency to establish a safety policy. Of the 49 agencies, six had not established safety policies and 43 had statements of policies which differed

Some of the policy statements were simply brief affirmations of the agencies' intentions to maintain safe workplaces. Others were more elaborate, for example, one large agency's policy statement discussed various aspects of the safety program, such as purpose, applicability, responsibilities for implementation, implementing guidelines, and referral of employee questions on the program.

Three of the 12 agencies had not revised their existing policies as a result of the act. Although the remaining nine agencies had changed their policy statements, the extent of the changes varied.

One department permitted each of its five bureaus or organizations to publish its own safety policies and had no safety policy for the department as a whole. Three of the department's bureaus and organizations were revising their policy statements. One bureau did not revise its policy statement, and one bureau adopted no safety policy at all.

SAFETY ORGANIZATIONS AND PROCEDURES

Executive Order 11612 requires the head of each Federal agency to establish and maintain an organization and a set of procedures that will effectively implement the agency's safety policy.

In many Federal agencies the safety organization is located within the personnel or administrative services offices and is at a level four, five, or six places below the agency head. (See app. IV.) Safety responsibilities in some agencies were considerably decentralized and were often only collateral duties.

Consequently, we found wide variations in the level of attention to which safety violations are brought. Only a few of the agencies surveyed bring violations to the attention of the agency head or his immediate assistant. Many bring violations to the attention of some official one or two levels above the safety officer. Others bring them only to the attention of operating officials. One agency advised us that it directed violations to the attention of the "lowest level appropriate to the problem."

Bringing violations to the attention of higher agency officials seems to be necessary to reinforce the authority of the safety organization, to insure correction of violations, and to provide coordination when safety responsibilities are fragmented.

Many agencies have published procedures for acting on employee safety and health complaints. However, 10 of the 49 agencies had not published such procedures. The safety officer at one agency lacking such a procedure told us that employees were advised to submit any such complaints through the regular employees' suggestion program

Federal employees have the option of sending their complaints directly to OSHA. OSHA's Office of Federal Agency Programs received 82 complaints from Federal employees between April 28, 1971, and October 20, 1972. OSHA directed the complaints back to the employing agencies, maintaining the anonymity of the complaints and requesting reports of corrective action. We believe that, when employees choose to direct their complaints to OSHA, it indicates a lack of confidence in their own agency's safety organization.

Federal agency safety organizations and procedures for dealing with employee safety complaints are fundamental to effectively implementing safety policies. Therefore, we believe Federal agencies should periodically review the status of their safety organizations to insure that (1) they

are located at the highest practicable level, (2) violations are reported to a sufficiently high level of authority to insure correction, and (3) where responsibilities are fragmented, they are adequately coordinated to produce a cohesive program. Agencies should also insure that employees have an effective means of submitting complaints and that complaints are acted upon.

WORKPLACE SURVEYS

Only one of the 12 agencies had surveyed its workplaces to determine the specific actions and costs required to comply with the act.

The agency sent a copy of the OSHA standards to its field installations in October 1971 and January 1972 and instructed them to identify all deviations from these standards in (1) agency installations, (2) space controlled by the General Services Administration, and (3) facilities under construction or being planned.

The agency's survey, substantially complete as of September 1972, estimated that \$45 million would be required to bring 166 installations into compliance with OSHA standards. This figure does not include costs for the 60 installations in which the General Services Administration controlled space. Agency officials planned to request corrective action from local building managers, these costs have not yet been totaled.

In the absence of similar surveys by other Federal agencies, estimates of the extent of deviations of Federal workplaces from OSHA standards and the cost of corrective action are unavailable. Such surveys are needed as a first step in meeting the standards of the act.

DISSEMINATION OF STANDARDS BY FEDERAL AGENCIES

OSHA published its first standards in the May 29, 1971, Federal Register and had made approximately 141 revisions from this initial publication through October 1972.

The published standards cover rules for avoiding a variety of safety and health hazards in operations related to

general industry, agriculture, construction, and maritime. Consequently, not all the standards apply to each of the 49 agencies' operations. Therefore, we asked the agencies whether they had extracted and disseminated a list of those standards believed to apply to their operations.

--Twenty-eight agencies had made no such list of standards.

--Twelve agencies indicated they had made a list of standards

--Nine agencies indicated that some operating groups within their agency had extracted and disseminated applicable standards

However, we reviewed supporting documents for the 21 agencies which indicated they had extracted and disseminated standards and found that only three agencies and one operating group in another agency had actually done so. The remaining agencies were, for the most part, relying on their existing operating manuals which contained lists identifying hazards associated with the agency's operation and actions to minimize them. These lists, however, were generally published before the act became effective, and we found no evidence that any new areas covered by OSHA standards had been reviewed by these agencies and incorporated in the manual where applicable.

CHAPTER 5

FEDERAL AGENCY SAFETY AND HEALTH STATISTICS

Because published statistics on the incidence and rate of accidents and illnesses among Federal employees in the past have come from several sources and reporting systems, they have been inconsistent and unreliable. Under the act and Executive Order 11612, OSHA has imposed on Federal agencies a uniform recording and reporting system to produce statistics from the Federal sector which are comparable to those from the private sector.

The new system is a potential improvement, but a number of problems remain to be overcome before it can be effectively implemented.

PROBLEMS WITH PAST SOURCES OF FEDERAL STATISTICS

Federal agency safety and health statistics reported before the act was passed have come from

- the Bureau of Employees' Compensation in the Department of Labor (now called the Office of Federal Employees' Compensation),
- the Bureau of Labor Statistics in the Department of Labor, and
- the individual Federal agencies' information systems.

Safety statistics from these sources were unsatisfactory because (1) changes in the statistical base over the years limited the comparability of the data, (2) definitions of incidents, accidents, and illnesses lacked consistency, (3) statistics related largely to safety, and (4) statistics relating to health were not readily identifiable and did not adequately indicate the causes of injuries or illnesses.

OSHA'S NEW FEDERAL AGENCY REPORTING SYSTEM

OSHA urged Federal agencies to begin recording occupational safety and health statistics under a new uniform system effective January 1, 1972.

Under OSHA's new system

- Data is produced in a format which is compatible with the Bureau of Labor Statistics' data on occupational injuries and illnesses in the private sector.
- Uniform reporting requirements are imposed to accumulate consistent data from the Federal agencies.
- The data is being computerized and will be available in as many as 39 different types of printouts.
- An automatic typewriter connected by direct line to the computer will permit instant response to requests for information from the data bank
- Data can be retrieved faster and analyses will be better

OSHA is experiencing problems in implementing the new system.

IMPLEMENTATION PROBLEMS

Lack of compatibility

The new system is not compatible with some existing Federal agency reporting systems. There will be difficulties in adapting agency systems to the uniform requirements which OSHA is attempting to impose.

For example, one agency recently installed an automated safety recordkeeping system based on the American National Standards Institute system methodology. This methodology is not compatible with the requirements of OSHA's new system. The agency indicated that adoption of the OSHA system might require it to abandon its new system and to return to a manual system.

A number of agencies are reluctant to replace existing reporting forms with those prescribed by OSHA. Two agencies plan to continue to use some of their forms which they believe provide information equivalent to that required by OSHA. Another agency plans to develop new forms to replace the OSHA forms. One of the forms prescribed by OSHA is a

"Summary Report of Federal Occupational Accidents " One agency maintains that data required by this form relating to accidents from cranes and lifts and to tort claims from accidents cannot be obtained without considerable expense Another agency says that it can furnish the tort claims data but that it will not be current with the accident data, because many claims are not paid until long after the accidents

Another OSHA form, "Summary Report of Federal Occupational Injuries and Illnesses," requires information on the total man-hours worked by all employees One agency stated that it is not capable of getting this information and that the cost of reporting total man-hours worked--excluding vacations, holidays, and sick leave and including overtime, as required by OSHA--would be prohibitive Another agency keeps no man-hour records for certain employees who are considered on duty 24 hours a day

Definition problems

Problems of defining criteria to be used in compiling statistics, which have been troublesome in previous statistical series, remain in the new OSHA system For example, in April 1972 the Federal Safety Advisory Council requested OSHA to inform the Council on "whether a number of definitive examples were 'occupational' ('job related') or not " The examples consisted of 44 situations which might arise in Federal workplaces and which would require decisions on whether they were job related or not. Several of these situations are shown below

- An employee was reaching for the telephone when he felt a pain in his back, he had no history of a back condition, he had made no sudden exertion, and the attending physician's diagnosis is back strain
- An employee working in a poorly ventilated office with three coworkers contracts influenza after all three of the other employees have already been off work within the past week with influenza, there is no influenza in the employee's home.
- An employee traveling by scheduled airline on agency business is injured in crash of aircraft

--A clerical employee develops a stomach ulcer, this employee has been under mental strain for several years because cutbacks in personnel necessitated his taking on additional responsibilities.

--A supervisor is attacked off the job by one of his employees and is injured, the attack resulted from a dispute over work problems.

OSHA has not yet settled the question of whether these and the other 39 examples are job related for reporting purposes.

CHAPTER 6

NEED FOR STRONGER LEADERSHIP ROLE BY OSHA

OSHA's leadership role in improving Federal agency safety and health programs has been limited and needs to be strengthened. Responsibility for developing and implementing Federal programs lies with the individual agencies. However, in the absence of effective leadership and guidance by OSHA, Federal programs are likely to continue to lack consistency and overall direction, as described in chapter 4.

OSHA's responsibilities for coordination and guidance of safety and health activities in Federal agencies are centered in its Office of Federal Agency Programs

The Office has expended time and effort emphasizing the importance of Federal safety and health programs. However, most of the Office's activities have related largely to matters involving dissemination of information and planning of future efforts while Federal agencies most needed effective guidance to insure their appropriate responses to the requirements of the act. Safety officials in most agencies which we reviewed said that OSHA had provided them with very little assistance and that the assistance they had received was at their request.

OSHA'S FEDERAL PROGRAMS' ACTIVITIES

In August 1971 the Secretary of Labor wrote to the heads of Federal departments and agencies transmitting copies of the act, Executive Order 11612, and the safety and health standards. The Secretary requested the head of each agency to advise him of the agency's plans to implement the standards which were applicable to the agency's operations. Responses to the Secretary's request lacked detail.

As of November 1972 OSHA had not followed up on the responses, and, as a result, OSHA was not aware of the extent of Federal compliance with the standards. OSHA officials stated that as time permitted they were reviewing and analyzing the responses to determine what type of followup was required.

In October 1971 OSHA advised Federal agencies that it had established a four-step Federal safety plan. The first step was to devise new systems for recording and reporting Federal agency occupational accidents. On December 2, 1971, these requirements were forwarded to Federal departments and agencies. Each agency was requested to submit a plan of action by January 1, 1972, and they were to start recording occupational injuries and illnesses at that time, with the first quarterly report due May 15, 1972.

The second step was to establish methods for evaluating Federal agency occupational safety and health programs. OSHA officials stated that it had forwarded copies of these guidelines to each agency during March 1972 to give them some idea of what to expect from evaluations of their programs.

The third step was to develop promotional campaigns to give Federal agencies incentive to improve their program results. We noted that no new campaigns had been developed since OSHA was created in April 1971. OSHA did, however, extend the Zero In On Federal Safety program into December 1973. This program, administered by the Bureau of Labor Standards, began in January 1971 and was to have run to December 1972. Under the program each Federal agency was expected to locate specific work hazards and remove them. On the basis of a recommendation by an ad hoc committee of the Federal Safety Advisory Council, OSHA was also considering development of a new program, Safety Through 76, to take over when the current Zero In On Federal Safety program ends.

The fourth step was to design a model occupational safety and health program for use by all agencies. This program was to include all the elements of Executive Order 11612, however, as of December 1972 OSHA had not designed such a program. OSHA officials stated that OSHA intends to complete evaluations of present agency programs to extract the good points and to combine them into a model program. One member of the Federal Safety Advisory Council expressed concern during the Council's first meeting in December 1971 over the low priority OSHA was giving to developing a model program.

SAFETY AND HEALTH REGULATIONS NOT ISSUED

Executive Order 11612 requires OSHA to issue regulations to provide guidance to the heads of Federal departments and agencies to assist them in fulfilling their occupational safety and health responsibilities

At the time of our review, OSHA had not developed or issued the required regulations. We believe that the absence of such guidance from OSHA has contributed to the lack of consistency and overall direction of Federal agency programs described in chapter 4. At the close of our fieldwork in July 1972, OSHA officials advised us that they were drafting some of the required regulations and that these regulations were undergoing agency review.

SLOW PROGRESS IN EVALUATING AGENCIES' PROGRAMS

The Executive order requires the Department of Labor to evaluate the safety programs of Federal departments and agencies annually. It also provides that, with the consent of the head of the affected department or agency, the Department may conduct at headquarters, or in the field, such investigations as it deems necessary.

At the time of our review, OSHA had made initial evaluations of the programs at the headquarters of four agencies in Washington, D.C., and had plans to evaluate the programs of six more by the end of calendar year 1972. In addition, OSHA had scheduled for calendar year 1973 evaluations of 25 Federal agencies.

OSHA officials advised us that OSHA had begun accelerating its evaluations of Federal programs and would be making specific recommendations to agencies on how to improve their programs. The officials stated that it would take several years before OSHA would be adequately staffed to effectively evaluate Federal programs.

OTHER OSHA ACTIVITIES

In March 1972 OSHA cosponsored a Federal Safety and Health Seminar with the Federal Safety Advisory Council. The seminar focused on agency responsibilities to develop and implement safety and health programs. This seminar--held

almost 1 year after the inception of OSHA--was the first significant contact most Federal agencies had with OSHA

Other OSHA activities include

- establishment of the Federal Safety Advisory Council,
- consolidation of information obtained from Federal agencies for preparing the Mission Safety--70 report and the President's Report on Occupational Safety and Health,
- review of agency reports submitted by Federal agencies in connection with the President's Safety Awards Program,
- dissemination of information in connection with the Zero In On Federal Safety program initiated prior to passage of the act, and
- dissemination of information requested by Federal departments and agencies

CHAPTER 7

CONCLUSIONS AND RECOMMENDATIONS

The President of the United States has stated that the Federal Government, as the Nation's largest employer, has an obligation to set an example to insure safe and healthful workplaces for Federal employees. It appears, therefore, that the Federal Government should insure that the safety and health standards established under the act are implemented and enforced in its own workplaces.

Federal workplaces include general offices, scientific and technical laboratories, and construction and industrial activities. Statistical averages have shown a slight reduction in the disability injury frequency rate (from 6.6 per million employee-hours worked in 1970 to 6 in 1971) for Federal employees. Such averages should not obscure the fact that occupational safety and health involve thousands of workplaces, each of which must be considered individually. As shown by our inspections, some Federal workplaces have safety and health hazards.

The importance of occupational safety and health in Federal workplaces has been the subject of a number of promotional campaigns, including most recently the Mission Safety--70 and Zero In On Federal Safety programs. These have complemented agencies' safety programs, some of which are decades old.

Our review indicates that much more needs to be done if the Federal Government is to insure that its own agencies are complying with the standards which it is enforcing in the private sector and if Federal employees are to be assured of safe and healthful conditions in workplaces.

OSHA has not issued regulations required by the Executive order which would guide the Federal departments and agencies in developing comprehensive and effective occupational safety and health programs. OSHA has not evaluated many Federal programs to determine whether Federal departments and agencies are complying with the act and the Executive order. Consequently, OSHA does not know whether Federal employees are assured of safe and healthful working conditions.

We believe that the following steps should strengthen Federal safety and health programs

Comprehensive workplace surveys--We believe that, as a start, each Federal agency should make a comprehensive survey of its workplaces to determine the specific and attendant costs required to bring the agency into compliance with the act and the Executive order. OSHA should assist any agencies requiring special expertise in conducting their surveys. The results of these surveys should be compiled by OSHA, presented to the Federal Safety Advisory Council, and made available to the Congress

Professional inspections of workplaces--The Department of Labor believes that primary responsibility for a safety and health program rests with the Federal agencies and that they, not OSHA, should insure its implementation under the surveillance of OSHA. The Department informed us that OSHA plans to issue regulations to provide for uniformity in Federal inspection procedures and for reasonable abatement periods

We believe that OSHA's experience in the private sector and our review show that effective surveillance requires that the regulations be accompanied by independent inspections of workplaces by qualified professional safety engineers and industrial hygienists.

Therefore, we believe that OSHA should bear a responsibility in the Federal sector similar to that which it bears in the private sector--to independently inspect workplaces to insure compliance with safety and health standards. One means of accomplishing this would be for the Congress to amend the act to bring Federal workplaces under the inspection responsibility of OSHA. This responsibility should include the right of OSHA to inspect Federal workplaces without the permission of, or prior notice to, the agency head. This is the same authority that OSHA now exercises with respect to private businesses.

Reporting system--We believe there are problems to be overcome if OSHA's Federal agency reporting system is to realize its potential. Definitions of job-related incidents and other data must be sharpened, and incompatibilities in existing agency reporting systems must be remedied. It is

important that OSHA continue to work with Federal agencies to solve these problems if the new reporting system is to avoid repeating past problems

RECOMMENDATIONS TO THE SECRETARY OF LABOR

To help strengthen safety and health programs in the Federal Government, we recommend that OSHA be directed to take a strong leadership role in (1) preparing and issuing regulations required by the Executive order which would provide further assistance and guidance for agencies to use in developing their own programs, (2) developing a more aggressive and expanded evaluation and inspection program to insure that Federal agencies are making adequate efforts to provide safe and healthful workplaces, (3) continuing to work with Federal agencies to resolve the problems of definitions and to make the new reporting system more compatible, and (4) assisting Federal agencies, in consultation with the Federal Safety Advisory Council, in developing a system to insure that qualified safety engineers and industrial hygienists adequately inspect workplaces and in making comprehensive surveys of their workplaces to determine the specific actions and to estimate the costs needed to bring the agencies in compliance with the act

AGENCY COMMENTS

We discussed the recommendations informally with officials of the Department of Labor who concurred generally with all the recommendations. By letter dated January 3, 1973, the Department advised us that OSHA had taken or planned to take various actions along the lines we suggested.

MATTER FOR CONSIDERATION BY THE COMMITTEE

In view of the number and severity of the violations of safety and health standards noted during our limited inspections and the need to strengthen safety and health programs in many agencies, we recommend that the Committee consider having the Occupational Safety and Health Act of 1970 amended to bring Federal workplaces under the inspection responsibility of OSHA. The inspections should supplement, and not replace, inspections by the agencies' own personnel

U S DEPARTMENT OF LABOR
 OFFICE OF THE ASSISTANT SECRETARY
 WASHINGTON D C 20210



JAN 3 1973

Mr. George D. Peck
 Assistant Director
 Manpower and Welfare Division
 General Accounting Office
 Washington, D.C 20548

Dear Mr. Peck

This is in response to your letter of November 24, 1972 and subsequent meetings held on December 8, and 11, 1972 with Department of Labor officials regarding the proposed report on the Federal Occupational Safety and Health programs.

The revised Chapter 7 "Conclusion and Recommendations" summarizes pertinent areas of concern in Federal safety. The Department of Labor agrees that there is a special obligation for the Federal Government to set an example for the private sector and to assure its employees safe and healthful workplaces. However, we believe that primary responsibility for a safety and health program rests with the agency heads, and they not OSHA, should assure its implementation under the evaluative surveillance of OSHA.

The report and the revised Chapter 7 have been reviewed, and the comments that follow are concurred in by OSHA.

Recommendation No 1

..."OSHA be directed to take a strong leadership role by developing and issuing regulations required by the Executive Order which would provide further assistance and guidance for departments and agencies to use in developing their own programs. ."

Comment

OSHA has begun the development of regulations to provide guidance to agencies in program operations. A notice of proposed rulemaking will be published shortly in the Federal Register inviting public comment on various aspects of the Federal safety program. The first planned regulation

APPENDIX I

will cover reporting requirements. Additional ones will provide for the adoption and implementation of standards, procedures for submission and handling of complaints, agency self-evaluation, and criteria for an awards program. Also planned is the development of a regulation to cover internal safety and health inspections which would require correction of hazardous conditions. This regulation would include a complete self-inspection program. OSHA would review each agency's inspection performance at the time it evaluates their program.

Recommendation No. 2:

..."Preparing a more aggressive and expanded evaluation and inspection program to assure that Federal agencies are making adequate efforts to provide safe and healthful places for Federal employees..."

Comment

A schedule for the evaluation of agency occupational safety and health programs has been set. The plans and procedures for conducting these evaluations have been developed and sent to all agencies. The guidelines pertaining to the evaluations cover eight basic program elements. Any agency using these eight basic elements could easily determine the adequacy of their program and adjust it to fit their needs.

Ten program evaluations have been completed to date. During the first half of CY 1973 it is planned to increase our rate of evaluations with additional staff presently being recruited. If staff is added as planned the target goal of 25 agencies for FY 1973 can be met. This will include most major Federal departments and agencies.

During FY 1974 or at the latest FY 1975 each agency will be evaluated annually.

Recommendation No. 3:

..."Continuing to work with Federal agencies to resolve the definitional and incompatibility problems in its new reporting system..."

Comment:

Guidelines were sent to all Federal agencies outlining their responsibility in recordkeeping. Ninety-three agencies have submitted formal plans for reporting to OSHA. It is important to note that the data collected for the first and second quarters of calendar year 1972 were partially experimental. The third and fourth quarters will be more fully representative of the entire Federal Government.

A committee of the Federal Safety Advisory Council is currently reviewing the Federal Recordkeeping system.

They have raised specific questions concerning definitions; the preparation of guidelines; establishment of an Interpretations Committee; development of an educational program; and finally, a plan to facilitate comparisons with FECA claims. Preliminary meetings within Labor indicate that at least some of the suggestions would be helpful to the program.

Recommendation No. 4:

..."Working in consultation with the Federal Safety Advisory Council to assist Federal departments and agencies in developing a system to assure that adequate inspections of Federal workplaces are made by qualified safety engineers and industrial hygienists and to have comprehensive surveys of their workplaces made to determine the specific actions and estimate the costs needed to bring the agencies in compliance with the Act..."

Comment:

The Act and Executive Order make the agency heads responsible for administering periodic inspections of their workplaces. The responsibility for the hiring or contracting of inspection services should remain with the agency heads we believe. OSHA will be issuing guideline regulations to provide for uniformity in the inspection procedures and for reasonable abatement periods.

[See GAO note 1, p. 64]

[See GAO note below.]

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Kouzes", is written over a faint, rectangular stamp or watermark.

TOM KOUZES
Deputy Assistant Secretary for
Administration and Management

GAO Note

1. The deleted material pertained to a matter contained in the draft report which is not included in this report.

DEPARTMENT OF LABOR ESTIMATES OF CIVILIAN DISABLING INJURIES
AND FREQUENCY RATES FOR SELECTED FEDERAL AGENCIES

Agency	Employees in 1971	Frequency rates for		Disabling injuries in 1971 (note b)
		1970 (note a)	1971 (note a)	
Agriculture	112,616	8 2	7 0	1,649
Commerce	34,783	6 7	3 5	252
Defense	1,080,935			
Air Force	244,903	4 7	4 6	2,829
Army	423,673	3 4	3 6	3,139
Navy	353,386	3 7	4 0	2,964
Other	58,973	3 1	3 2	398
Health, Education, and Welfare	111,490	3 3	3 5	816
Housing and Urban Development	16,492	2 2	2 0	67
Interior	68,511	7 6	7 3	1,034
Justice	43,473	4 0	4 1	374
State	38,140	1 7	1 9	153
Labor	12,044	2 1	3 1	78
Transportation	69,669	4 5	4 4	637
Treasury	100,271	3 0	2 8	587
Post Office	721,000	14 1	12 0	17,466
Veterans Administration	176,068	6 0	5 5	2,001
General Services Administration	38,488	6 4	4 9	392
National Aeronautics and Space Administration	30,029	1 8	2 0	124
Tennessee Valley Authority	25,314	6 7	6 9	364
Government Printing Office	8,289	5 5	8 8	152
Selective Service System	7,814	1 6	2 3	38
Atomic Energy Commission	7,236	1 7	1 6	24
Environmental Protection Agency	6,831	(c)	1 3	19
Civil Service Commission	5,684	1 6	1 9	22
Library of Congress	3,950	3 5	3 5	29
Smithsonian Institute	2,654	5 8	5 1	28
National Labor Relations Board	2,265	1 3	1 7	8
Railroad Retirement Board	1,789	2 2	2 4	9
Interstate Commerce Commission	1,685	0 6	1 7	6
Securities and Exchange Commission	1,375	0 7	0 7	2
Federal Trade Commission	1,340	0 7	2 2	6
Federal Home Loan Bank Board	1,310	0 8	1 1	3
National Science Foundation	1,151	0 0	2 1	5
Federal Reserve System	1,140	0 5	0 0	(c)
Federal Power Commission	1,099	0 0	0 4	1
Civil Aeronautics Board	654	0 0	1 5	2
Federal Mediation and Concili- ation Service	440	1 1	4 4	4
Export-Import Bank	376	0 0	0 0	(c)
Federal Maritime Commission	272	0 0	0 0	(c)
U S Tariff Commission	253	0 0	0 0	(c)
Renegotiation Board	238	0 0	2 0	1
All others	<u>175,625^d</u>	(c)	(c)	<u>947^d</u>
	<u>2,912,793</u>	6 6	6 0	<u>36,630</u>

^aSource 1972 Report to the President by the Secretary of Labor on Occupational Safety and Health Programs in the Federal Government, pages 83 to 86

^bThe injury frequency rate is the number of disabling work injuries per million employee-hours worked

^cFigures not available

^dEstimated figures

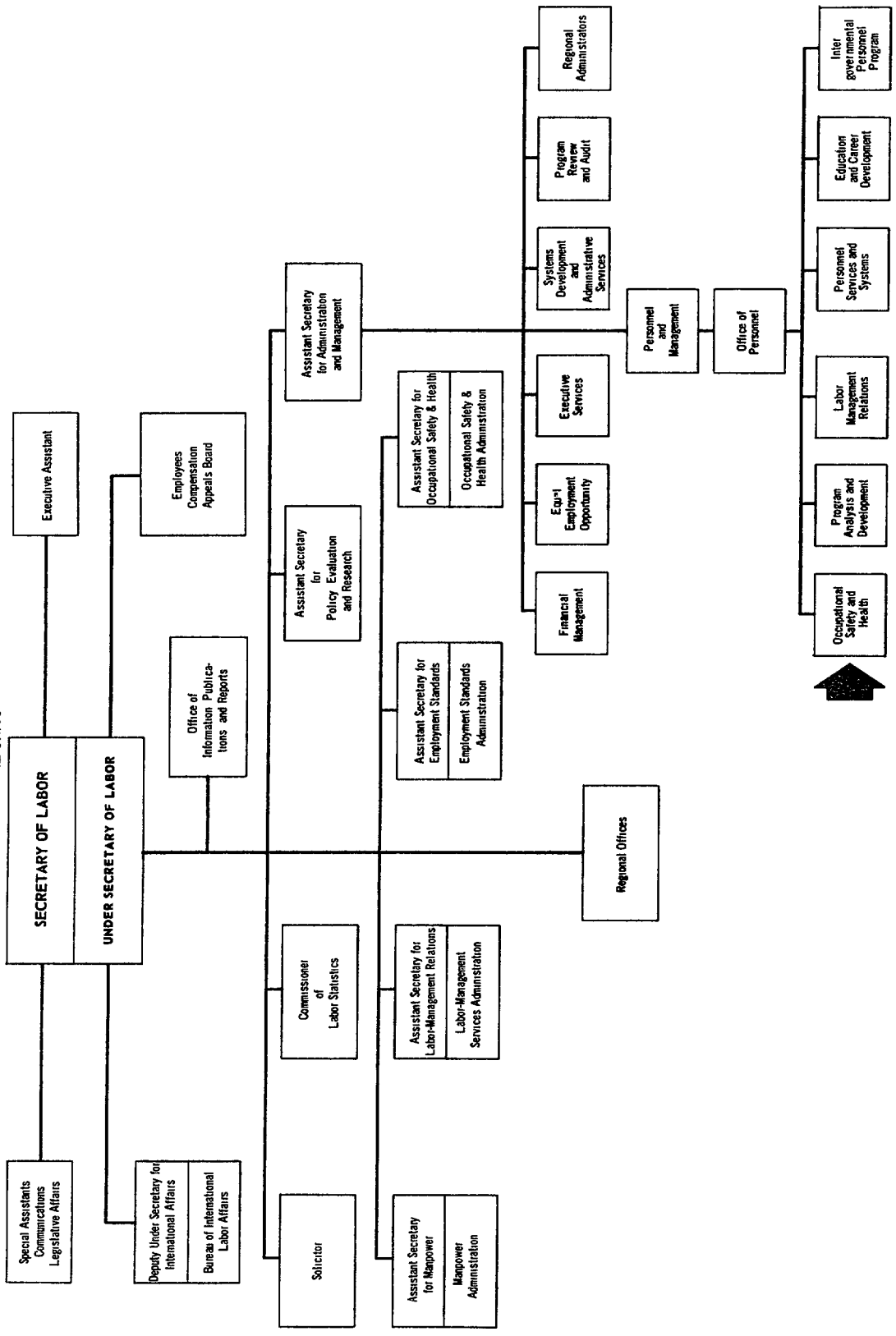
APPENDIX III

LIST OF 49 FEDERAL AGENCIES TO WHICH GAO SENT QUESTIONNAIRES

1. ACTION
2. Administrative Office of the United States Courts
3. Department of Agriculture
4. American Battle Monuments Commission
5. Architect of the Capitol
6. Atomic Energy Commission
7. Canal Zone Government
8. Civil Aeronautics Board
9. Civil Service Commission
10. Department of Commerce
11. Department of Defense
12. Environmental Protection Agency
13. Export-Import Bank of the United States
14. Federal Communications Commission
15. Federal Deposit Insurance Corporation
16. Federal Home Loan Bank Board
17. Federal Mediation and Conciliation Service
18. Federal Power Commission
19. Federal Reserve System
20. Federal Trade Commission
21. Foreign Claims Settlement Commission of the United States
22. General Services Administration
23. Government Printing Office
24. Department of Health, Education, and Welfare
25. Department of Housing and Urban Development
26. United States Information Agency
27. Department of the Interior
28. Interstate Commerce Commission
29. Department of Justice
30. Department of Labor
31. Library of Congress
32. National Aeronautics and Space Administration
33. National Capitol Housing Authority
34. National Labor Relations Board
35. National Science Foundation
36. Office of Economic Opportunity
37. Panama Canal Company
38. United States Postal Service
39. Railroad Retirement Board
40. Renegotiation Board
41. Securities and Exchange Commission

42. Selective Service System
43. Small Business Administration
44. Smithsonian Institution
45. Department of State
46. Tennessee Valley Authority
47. Department of Transportation
48. Department of the Treasury
49. Veterans Administration

EXAMPLE OF LOW PLACEMENT OF SAFETY ORGANIZATION
 ORGANIZATION CHART OF THE DEPARTMENT OF LABOR
 SHOWING MAJOR ORGANIZATIONAL UNITS



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