

OCCUPATIONAL SAFETY MANAGEMENT SYSTEMS IN VHA

- 1. REASON FOR ISSUE:** This directive states policy for the development, implementation and sustainment of Occupational Safety Management Systems (SMS) within the Veterans Health Administration.
- 2. SUMMARY OF CONTENTS:** This directive outlines the key elements necessary to implement an Occupational SMS as a management framework for VHA Occupational Safety Programs.
- 3. RELATED ISSUES:** VA Directive 7700, Occupational Safety and Health, dated February 11, 2009; VHA Directive 7701, Comprehensive Occupational Safety and Health Program, dated May 5, 2017.
- 4. RESPONSIBLE OFFICE:** The Assistant Under Secretary for Health for Support (19) is responsible for the content of this directive. Direct questions to the Director, Office of Occupational Safety and Health (19HEF) at 202-632- 7888.
- 5. RESCISSIONS:** VHA Directive 7703(1), Safety Management System and Governing Safety Policy Statement, dated February 1, 2016.
- 6. RECERTIFICATION:** This VHA directive is scheduled for recertification on or before the last working day of March 2026. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

**BY DIRECTION OF THE OFFICE OF
UNDER SECRETARY FOR HEALTH:**

/s/ Deborah E. Kramer
Acting Assistant Under Secretary for Health
for Support

NOTE: All references herein to VA and VHA documents incorporate by reference subsequent VA and VHA documents on the same or similar subject matter.

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OCCUPATIONAL SAFETY MANAGEMENT SYSTEMS IN VHA

1. PURPOSE

This directive requires VA medical facilities to develop and implement a Safety Management System (SMS) and governing safety policy to pursue continual improvement of workplace safety programs. **AUTHORITY:** 38 U.S.C. §§ 1709, and 7301(b).

2. BACKGROUND

a. VHA is committed to protecting and improving the safety of patients, employees, and visitors. SMS requires VA medical facilities to integrate accountability for safety into daily decision-making and long-term planning processes across all VHA organizations, activities, functions, and services.

b. The SMS process provides a systematic approach to managing safety hazards at VA medical facilities; in turn, this improves facility operations and the delivery of health care to the Veteran. When implemented as one element of an overarching business management system, a SMS provides a set of processes and practices enabling VA medical facilities to:

- (1) Identify and address hazards inherent to a VA medical facility's work processes.
- (2) Evaluate safety program management.
- (3) Ensure compliance with applicable safety requirements.
- (4) Determine opportunities for additional and continual improvement.
- (5) Manage safety responsibilities in a proactive manner and pay greater attention to safety regulatory requirements.
- (6) Integrate safety programs with the existing organizational structure, responsibilities, facility planning activities, work practices and processes, organizational goals, operations, and resource allocation.
- (7) Prevent injuries and mitigate hazards.
- (8) Enhance their image with regulators, patients, stakeholder groups and the general public.

c. All management systems share common structural elements, processes and management actions. The SMS process is similar to VHA's Green Environmental Management System (GEMS) Program, which will provide facility staff and management with a level of familiarity, simplicity and ease of implementation. The General Safety Guidebook (<http://vaww.hefp.va.gov/guidebooks/general-safety-guidebook-0>) describes the SMS structure in more detail and provides a "stepped"

implementation approach. In the same manner that GEMS programs strive for continuous improvement, the SMS will incorporate best practices identified during management review phases. **NOTE:** *This is an internal website that is not available to the public.*

d. The systematic approach of a SMS allows standardized implementation across VA medical facilities, while retaining flexibility for regional and facility-specific requirements. This improved consistency will strengthen relationships with Federal, State and local regulators, Veterans Service Organizations, and other stakeholders.

e. The SMS approach to managing facility safety follows the familiar “Plan-Do-Check-Act” cycle used in many of VHA’s existing processes, including those facilitating The Joint Commission accreditation. As such, VHA can seamlessly integrate many of the SMS requirements with our current practices to avoid duplication. By documenting established program elements that overlap with SMS requirements, VA medical facilities can avoid duplicative effort and reduce the time to full implementation.

f. For the purposes of developing and implementing a SMS, a Consolidated Mail Outpatient Pharmacy (CMOP) or a multi-campus health care system under common management is considered a single SMS facility. VA-owned Community-Based Outpatient Clinics (CBOC) and other affiliated satellite facilities must be included under the parent VA medical facility’s SMS.

3. POLICY

It is VHA policy to maintain a SMS for the management of occupational safety practices at all VA medical facilities.

4. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for ensuring overall VHA compliance with this directive.

b. **Assistant Under Secretary for Health for Operations.** The Assistant Under Secretary for Health for Operations is responsible for:

(1) Communicating the contents of this directive to each of the Veterans Integrated Service Networks (VISNs).

(2) Assisting VISN Directors to resolve implementation and compliance challenges.

(3) Providing oversight of VISNs to ensure compliance with this directive and its effectiveness.

c. **Assistant Under Secretary for Health for Support.** The Assistant Under Secretary for Health for Support establishes policy and provides guidance as necessary to ensure the timely and successful implementation of this directive.

d. **VHA Central Office Program Directors.** VHA Central Office Program Directors (including, but not limited to Consolidated Mail Outpatient Pharmacies and Consolidated Payment Accounting Centers) are responsible for developing, implementing and sustaining the SMS process within their organizations.

e. **Director, Office of Occupational Safety and Health.** The Director, Office of Occupational Safety and Health is responsible for overall program management of VHA efforts related to SMS at the national level, to include:

(1) Overseeing VHA's program for Occupational Safety Management Systems.

(2) Periodically assessing the VHA program for Occupational Safety Management Systems for continued need, currency and effectiveness.

(3) Developing policy and safety program guidance for use at VA medical facilities in the development and implementation of SMS.

(4) Developing a facility audit process to verify the implementation status of the VA medical facility SMS.

(5) Acting as VHA liaison to Occupational Safety and Health Administration and other government entities regarding SMS and related safety matters.

(6) In conjunction with appropriate VA and VHA officials, developing performance standards and measures along with position description statements related to SMS for appropriate VHACO Upper Level Leadership.

f. **Director, Enterprise Support Service.** The Director, Enterprise Support Service (ESS), is responsible for promoting best practices related to SMS and safety compliance by:

(1) Publishing and updating SMS guidance and best practices relevant to VHA as part of the General Safety Guidebook.

(2) Supporting SMS implementation through development of information technology and web-based information services.

g. **Director, Employee Education System.** The Director, Employee Education System is responsible for developing and delivering training related to SMS implementation.

h. **Veterans Integrated Service Network Director.** The VISN Director is responsible for:

(1) Ensuring a SMS is developed and implemented at VA medical facilities for which they are responsible.

(2) Performing a gap analysis of each VA medical facility SMS on an annual basis to

determine the status and effectiveness of implementation. Gap analysis is performed by VISN health and safety staff members or qualified consultants using recognized and established OSH protocols.

(3) Providing VA medical facilities the resources needed to develop and implement VA medical facility SMS and safety compliance programs.

(4) Developing and implementing performance standards or measures along with position description statements related to safety program management for VISN managers and VA medical facility Directors.

(5) Providing SMS and other safety training to VISN health and safety staff members and other staff members responsible for SMS to:

(a) Perform gap analysis to determine the status and effectiveness of VA medical facility SMS implementation.

(b) Assess the effectiveness of VA medical facility safety programs.

i. **VA Medical Facility Director.** The VA medical facility Director is responsible for:

(1) Developing and implementing a VA medical facility SMS. ***NOTE: Copies of documents and documentation related to the SMS must be available at all affected facilities. For more information please see General Safety Guidebook listed above.***

(2) Overseeing the implementation of SMS at VA medical facilities.

(3) Approving or modifying the annual report submitted by the VA medical facility Safety Committee Chair.

j. **VA Medical Facility Safety Committee (or equivalent) Chair.** The VA medical facility Safety Committee (or equivalent) Chair is responsible for:

(1) Preparing an annual report. The VA medical facility Safety Committee will submit an annual report to the VA medical facility director for approval or modification and signature. The annual report must meet The Joint Commission Environment of Care requirements for an annual program effectiveness evaluation and must include:

(a) Accomplishments for the year (e.g., the status and results of objectives and targets).

(b) Resources expended on the SMS.

(c) Results of SMS gap analysis, internal audits and the Annual Workplace Evaluation (AWE).

(d) Status of action items for correction of deficiencies identified in the SMS gap analysis, internal audits and the AWE.

(e) Significant safety hazards identified at the facility.

(f) Proposed objectives and targets for the upcoming year (either new or modified).

(2) Operating VA medical facilities in a manner that complies with their facility's SMS and governing safety policy.

(3) Developing a VA medical facility safety vision statement. **NOTE:** *The VA facility-specific safety vision statement is sometimes referred to as a 'safety policy' but is not VHA policy and should be understood as a vision statement of safety expectations. A template can be found at <http://vaww.hefp.va.gov/sites/default/files/files/2020-10/Sample%20policy%20statements.doc>.*

(4) Taking necessary steps to meet objectives and targets established by the VA medical facility SMS.

(5) Implementing actions to correct safety deficiencies in a timely manner.

(6) Taking steps to obtain funding to achieve SMS objectives and targets and correct identified SMS deficiencies.

(7) Communicating SMS requirements to all staff members.

(8) Including SMS and other safety requirements, as appropriate, in Standard Operating Procedures (SOP), work practices and other processes of all VA medical facility operational units.

(9) Taking appropriate action to make certain work performed by contractors and consultants conforms to the requirements of the VA medical facility SMS.

(10) Developing and implementing performance standards and measures and position description statements related to safety program management for managers and staff members of VA medical facilities.

5. TRAINING

There are no formal training requirements associated with this directive.

6. RECORDS MANAGEMENT

All records regardless of format (e.g., paper, electronic, electronic systems) created by this directive shall be managed per the National Archives and Records Administration (NARA) approved records schedules found in VA Records Control Schedule 10-1. Questions regarding any aspect of records management should be addressed to the appropriate Records Manager or Records Liaison.

7. REFERENCES

a. Pub. L. 91-596.

- b. 29 U.S.C. § 668.
- c. 29 U.S.C. § 673.
- d. 29 CFR part 1960.
- e. 38 U.S.C. § 501.
- f. 38 U.S.C. § 512.
- g. 38 U.S.C. § 901.
- h. 38 U.S.C. § 1709.
- i. 38 U.S.C. § 7301(b).
- j. E. O. 12196, Occupational Safety and Health Programs for Federal Employees.
- k. VA Directive 7700, Occupational Safety and Health, dated February 11, 2009.
- l. VHA Directive 7701, Comprehensive Occupational Safety and Health Program, dated May 5, 2017.
- m. VHA General Safety Guidebook, <http://vaww.hefp.va.gov/guidebooks/general-safety-guidebook-0>. **NOTE:** *This is an internal website that is not available to the public.*
- n. Occupational Safety and Health Administration <http://www.osha.gov>.