



# Authority and Line Accountability

OSHA VPP

November 2024

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This presentation outlines authority and line accountability requirements for the purposes of Occupational Safety and Health Administration (OSHA) Voluntary Protection Programs (VPP) recognition.

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

## Objectives

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

This presentation is beneficial to safety and health (S&H) professionals, VPP representatives, leaders, and various levels of management and supervision.

## Background & Importance

- Included in the ML&EI criteria for VPP
- Addresses senior management's ultimate responsibility for S&H
- Identifies S&H responsibilities for all personnel
- Assigns authority to responsible personnel
- Dedicates adequate resources to fulfill responsibilities
- Holds personnel accountable for their assigned responsibilities
- Provides access to qualified S&H professionals

ML&EI = Management Leadership and Employee Involvement

The authority and line accountability sub-element of VPP ensures the organization identifies those who have the authority to make S&H decisions and changes in the workplace. This sub-element also defines the S&H responsibilities held by all levels of personnel and validates the systems that hold personnel accountable for meeting those responsibilities.

## Documentation

- Organizational charts
- S&H mission, vision, and policy statements
- S&H program signatures page
- Letters of designation
- Job descriptions outlining S&H responsibilities
- Performance appraisals considering S&H
- S&H budget and resource allocations



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Image retrieved from Bing Images



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

Organizational charts may include the structure of leadership/management, where safety falls within the organization, and the structure of the safety office, if applicable.

An organizational chart reflecting the hierarchy of safety office authority helps to justify access to qualified S&H professionals.

S&H resources may include budget, S&H professionals, dedicated safety representatives, allocated training time, S&H promotions/marketing/initiatives, hazard controls, and personal protective equipment (PPE) availability.

The image shows a hierarchy of authority in an organization. Image retrieved from Bing Images (free to share and use license) at: <https://atabsh.files.wordpress.com/2011/09/organizational-structure.jpg>

## Leadership/Management Knowledge

- Leaders and management should know about:
  - Their S&H roles and responsibilities
  - Who has S&H responsibilities
  - Authority given to those assigned S&H responsibilities
  - How they are held accountable for S&H
  - How they hold others accountable
  - Resources dedicated to ensure workplace S&H



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Responsibility to implement change, without appropriate authority, often results in uncontrolled hazards or ineffective hazard controls. Issues may arise when leadership delegates authority to persons who lack sufficient power or resources to ensure an effective SOHMS. For example, you may assign a first line supervisor responsibilities for collecting safety inspections from all other first line supervisors and validating the inspection forms are complete. The other first line supervisors may express that this first line supervisor has no rank or authority to ensure they complete their inspections. Sometimes, you need letters of designation to show this authority.

A common question leaders and managers will be asked during assessments is whether they provide feedback for S&H performance during appraisals. Providing feedback and holding others accountable allows the organization to identify failures and breakdowns within the chain of command. Ultimately, senior leaders must accept responsibility for S&H in the organization, even if they delegate S&H functions to others.

The image represents leadership discussing their S&H responsibilities. Image retrieved from Bing Images (free to share and use license) at: [https://upload.wikimedia.org/wikipedia/commons/8/8c/Flickr\\_-\\_The\\_U.S.\\_Army\\_-\\_Basic\\_combat\\_training\\_visit.jpg](https://upload.wikimedia.org/wikipedia/commons/8/8c/Flickr_-_The_U.S._Army_-_Basic_combat_training_visit.jpg)

## Key Personnel Knowledge

- Key personnel should be knowledgeable about:
  - Documentation outlining S&H responsibilities
  - How responsibilities are incorporated into performance appraisals
  - S&H budget and how it is determined
  - Training budget and training time allocations
  - Special funding for S&H initiatives
  - Availability of qualified S&H professionals

S&H professional resources include: safety professionals, qualified industrial hygienists, and occupational health care professionals.

You do not have to “own” these personnel, meaning they do not have to be a direct part of your organization; “access” can defer to base safety and industrial hygiene offices or outside occupational health care facilities.

Key personnel may include:

- Human resources
- S&H training managers
- Budget office
- Industrial hygiene
- Occupational health
- S&H professionals
- Recordkeepers
- Union steward

## Workforce Knowledge

- Employees should be knowledgeable about:
  - Their S&H roles and responsibilities
  - Who is ultimately responsible for S&H in the organization
  - How they are held accountable for their roles and responsibilities
  - Availability of S&H assistance, training, and resources
  - S&H-related items in their performance appraisals, if applicable
  - How to be involved in the SOHMS



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Image retrieved from Bing Images



Employees do not need to know what the S&H budget is or how it is determined; however, they should have a basic understanding of the resources available to them. Employees provide valuable information on identifying and determining types and quantities of needed resources, such as S&H training, PPE, and S&H subject matter expertise.

A common misconception is the safety professional(s) is ultimately responsible for S&H, rather than senior leadership. It is important employees understand the head of the organization is responsible for ensuring their workplace S&H.

The image represents a group of employees and their willingness to contribute.

Image retrieved from Bing Images (Creative Commons).

## Action Checklist

- Establish standards of S&H performance
- Convey senior leadership's responsibility for S&H
- Identify resources needed to achieve performance standards
- Assign authority for responsibilities, if needed
- Develop a performance measurement system
- Apply measures and consequences for lack of accountability
- Evaluate the accountability system

Follow this action checklist to implement and sustain VPP expectations for authority and line accountability. Each of these action checklist items will be covered in more detail on the following slides.



## Standards of Performance

- Document S&H performance expectations through:
  - S&H mission, vision, and policy
  - Written S&H plans, programs, and procedures
  - S&H goals and objectives
  - Job descriptions
  - S&H rules
- Be specific, descriptive, and clear in communicating performance standards



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Image retrieved from Bing Images



Document all assigned S&H responsibilities. Make sure these responsibilities are specific and clearly understood.

A job description may include a generic expectation for S&H performance – you need to define each individual responsibility in some way.

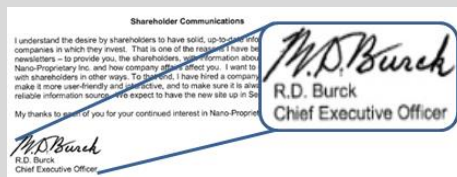
Consider documenting these responsibilities in written programs, procedures, or policies, or other potential documents. For example, your safety self-inspection program may have language stating supervisors are responsible for completing inspections each quarter. When you incorporate these responsibilities into programs, communicate them directly to supervisors at the time they assume their position so they can carry out their expectations.

The image represents the need to document any responsibilities and safety performance standards.

Image retrieved from Bing Images (free to share and use license) at:  
<https://pmtribe.files.wordpress.com/2011/03/responsibilities.gif>

## Leadership Responsibility

- Senior leadership must accept ultimate responsibility for workplace S&H:
  - Develop a S&H policy stating leadership's responsibility
  - Approve and sign a written S&H program
  - Communicate LEADERSHIP's S&H program – NOT the safety office's
  - Set the example by following the rules



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Image retrieved from Bing Images



S&H professionals serve as subject matter experts to senior leadership when implementing a SOHMS. It is senior leadership's program, not the other way around.

Documenting leadership's commitment to S&H shows they accept ultimate responsibility.

Communicate this information to the workforce, especially if employees have a misconception about the SOHMS being the safety office's program.

The image shows the CEO signature on a document. When the highest-ranking official signs a document in your organization, it demonstrates their commitment and highlights their responsibility.

Image retrieved from Bing Images (free to share and use license) at:  
[http://farm1.staticflickr.com/145/353099637\\_8bbb99028a.jpg](http://farm1.staticflickr.com/145/353099637_8bbb99028a.jpg)

## Resources Needed to Achieve Standards

- Analyze historical data to determine potential S&H needs
- Identify resources needed to mitigate potential workplace hazards
- Determine resources needed to maintain compliance or safe work conditions
- Evaluate the need for more S&H professionals



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Image retrieved from Bing Images



If you are going to hold employees accountable to perform to standards, or meet responsibilities, you have the obligation to provide the resources needed to achieve them.

Requirements and obligations include:

- The Federal Program under 29 CFR 1960.7 (Financial Management) requires federal agencies to provide appropriate resources for a S&H program: <https://www.osha.gov/laws-regs/regulations/standardnumber/1960/1960.7>
- The OSHA General Duty clause also details this obligation: [https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=OSHACT&p\\_id=3359](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=OSHACT&p_id=3359)

The images shows various S&H professionals working together. You may need additional subject matter experts to support your S&H program.

Image retrieved from Bing Images (free to share and use license) at: [http://farm8.staticflickr.com/7677/17125926318\\_bdfc32ae37\\_z.jpg](http://farm8.staticflickr.com/7677/17125926318_bdfc32ae37_z.jpg)

## Resources Needed to Achieve Standards (cont.)

- Estimate the time needed to fulfill S&H responsibilities
- Anticipate emergency situations and expenses
- Draft a S&H budget
- Review annually for increases or decreases in budget needs



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Image retrieved from Bing Images



What resources are necessary? It depends on the task, but generally, provides employees:

- Safe machinery and materials
- Safe facilities and physical environments
- S&H training and job-specific education
- Standard operating procedures to complete tasks safely
- Safe tools and equipment
- PPE needs

The image shows PPE needed for one type of job. You may need different types of PPE depending on your work environment.

Image retrieved from Bing Images (Creative Commons).

## Authority

- Some employees cannot carry out responsibilities without authority
- Review the best fits, by job title, for S&H responsibilities
- Conflicts occur with people of the same position or job title
- Create letters of designation, as needed
- Have leadership communicate assigned authority



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Think of a situation where an organization gives a supervisor a S&H responsibility and, as part of this responsibility, has to tell another supervisor what to do. This situation may create a conflict between the supervisors since they hold the same position and authority within their normal job duties.

The image shows a frustrated supervisor.

Image retrieved from Bing Images (Creative Commons).

## Example – Appointment Letter

MEMORANDUM FOR OO-ALC/SE  
 FROM: 309 SMXG/CL  
 SUBJECT: USR Appointment Letter

1. The following individuals will serve as Unit Safety Representatives within the 309<sup>th</sup> Software Maintenance Group (309 SMXG).

<u>Employee</u>	<u>Position</u>	<u>Coverage Area</u>	<u>Extension</u>
Annette Sharp	Primary	OB	777-5504
Todd Lane	Alternate	OB	777-9402
Jeffery Meyer	Primary	EN	777-0653
Brian McPhee	Alternate	EN	775-4253
Garth Persson	Primary	516 SMXS	775-4164
Bradley Jameson	Alternate	516 SMXS	586-2030
Larry Smith	Primary	517 SMXS	777-9712
Emily Booth	Alternate	517 SMXS	775-5745
William White	Primary (GSU)	517 SMXS	834-3970
Blake Maneley	Alternate (GSU)	517 SMXS	834-2075
Ian Vance	Primary	518 SMXS	777-6527
Todd Thurston	Alternate	518 SMXS	775-5082
Trevor Lillingston	Primary	519 SMXS	775-6724
Eugene Marshall	Alternate	519 SMXS	586-4319
Kim Carling	Primary	520 SMXS	586-8278
Victor Lora	Alternate	520 SMXS	586-2076

2. This supersedes memorandum 21 Aug 2015, USR/VSR Appointment Letter.

3. Please contact the Group USR, Brindy Starks at 775-4453 with questions.

KELLY D. CAPENER  
 Director, 309<sup>th</sup> Software Maintenance Group

cc:  
 All Appointees



Signed letters of designation appoint employees to positions, as needed, and provide their written authorities and limitations. Leadership signs these letters. Leaders and managers communicate this information to ensure all affected employees understand the authorities given to an individual(s).

The image shows an appointment letter for a new Unit Safety Representative at Hill Air Force Base; this letter gives the individual authority to carry out the actions delegated and assigned to them. Notice the letter is signed by the Director of the organization.

Image courtesy of Hill Air Force Base 309<sup>th</sup> Software Wing.

## Performance Measurement System

- Review current S&H responsibilities for all positions
- Assign priorities to S&H responsibilities
- Develop performance indicators for each responsibility
- Identify how to collect performance indicator data
- Review the current system for S&H criteria
- Incorporate prioritized responsibilities into current system for each position

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Review your Service or Agency-specific guidance for information on measuring performance.

Consider the following:

**Responsibility:** Identify all S&H responsibilities a position holds. List all responsibilities individually.

**Priority:** Prioritize each responsibility in order, determining which responsibilities are most important. Weigh some responsibilities more than others when you evaluate performance.

**Measurement:** Develop performance indicators for each responsibility, quantifying success. A performance indicator is how you measure whether an individual met their responsibility.

**Method:** Identify the way(s) to collect data and establish the performance indicators. Identify who or how you will collect data to determine if someone has met a responsibility.

**Incorporate:** Review the current performance measurement system to determine what S&H criteria, if any, are included. Then, incorporate the prioritized responsibilities into the performance review. If there are several S&H responsibilities, ensure more than one performance criterion exists.

## Accountability

- Compare failures to performance standards and expectations
- Expect consequences for failure to perform
- Equitably apply consequences across all personnel, including leadership and management
- Apply consequence to individual responsibilities, rather than an overall responsibility

**No consequences = No accountability**

To be effective, accountability depends on clearly defined and enforced consequences. There should be consequences when personnel do not meet their S&H responsibilities. These consequences are often documented and sometimes included in performance appraisals.

Consequences for failing to meet S&H responsibilities must:

- Be justified
- Correspond to the degree of positive or negative results
- Be applied consistently to all personnel

Before making derogatory marks in performance appraisals, investigate why the employee(s) did not meet the responsibility(ies). Hold personnel accountable for a responsibility only if they have control of the resources or the ability to fulfill the responsibility. If personnel are being measured and held accountable for meeting responsibilities they have no control over, they may attempt to gain control of those results somehow; these attempts may take the form of inappropriate behaviors. For example, if you measure a supervisor only on accident rates, they may threaten to terminate or retaliate against anyone who completes an OSHA injury report. Not only is the supervisor's behavior counterproductive, but it is illegal. It is a result, though, of an expectation for which they have little control.

To build a high level of trust between management and labor, apply consequences consistently at all levels of the organization. When management fails to meet a responsibility, hold them accountable just as an employee would.



## Accountability System Evaluation

- Evaluate the accountability system annually:
  - Are personnel meeting S&H responsibilities?
  - Are consequences applied when responsibilities are not met?
  - Are there any new S&H responsibilities not currently measured?
  - Were any standards difficult to measure?
  - Do any accountability policies, plans, procedures, or processes need to be modified?

Evaluations can be done by safety professionals or a safety committee.

If there are potential weaknesses in your accountability system, take notes on the behaviors and conditions in the workplace possibly pointing to inadequate or missing accountability system policies, plans, processes, and procedures. Incorporate new performance standards, as needed, to correct S&H behaviors or meet other or new responsibilities.

## Conclusion

- In this presentation, you learned to:
  - Summarize the background and importance of authority and line accountability
  - List authority and line accountability-related documentation
  - Describe the knowledge leadership/management, key personnel, and the workforce should have regarding authority and line accountability
  - Identify authority and line accountability actions to implement and sustain OSHA VPP