

Naval Audit Service



Audit Report



Commander, Navy Installations Command Safety and Occupational Health Workplace Inspections

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N2012-0027
22 March 2012

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MEMORANDUM FOR OFFICE OF THE CHIEF OF NAVAL OPERATIONS,
 SPECIAL ASSISTANT FOR SAFETY
 MATTERS/COMMANDER, NAVAL SAFETY CENTER
 COMMANDER, NAVY INSTALLATIONS COMMAND

Subj: COMMANDER, NAVY INSTALLATIONS COMMAND SAFETY AND OCCUPATIONAL HEALTH WORKPLACE INSPECTIONS (AUDIT REPORT N2012-0027)

Ref: (a) NAVAUDSVC memo 7510, N2011-NIA000-0044.000 dated, 23 Dec 10
 (b) SECNAV Instruction 7510.7F, "Department of the Navy Internal Audit"

1. The report provides results of the subject audit announced in reference (a). Section A of this report provides our findings and recommendations, summarized management responses, and our comments on the responses. Section B provides the status of the recommendations. The full text of management responses is included in the Appendices.
2. The following chart notes the action commands for each recommendation.

Command	Finding No.	Recommendation No.
Office of Chief of Naval Operations Special Assistant for Safety Matters/Commander, Naval Safety Center	1, 2	4, 6
Commander, Navy Installations Command	1, 2	1-3, 5

3. Actions planned by the applicable commands meet the intent of Recommendations 1-6. Recommendations 1-6 are considered open pending completion of the planned corrective actions, and are subject to monitoring in accordance with reference (b). Management should provide a written status report on the recommendations applicable to them within 30 days after target completion dates.

4. Please provide all correspondence to the Assistant Auditor General for Installations and Environment Audits, XXXXXXXXXXXXXXXXXXXXXXXX, with a copy to the Director, Policy and Oversight, XXXXXXXXXXXXXXXXXXXXXXXX. Please submit correspondence in electronic format (Microsoft Word or Adobe Acrobat file), and ensure that it is on letterhead and includes a scanned signature.

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5. Any future requests for this report under the Freedom of Information Act must be approved by the Auditor General of the Navy as required by reference (b). This audit report is also subject to followup in accordance with reference (b).

6. We appreciate the cooperation and courtesies extended to our auditors.



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Table of Contents

EXECUTIVE SUMMARY	1
Overview	1
Reason for Audit.....	2
Noteworthy Accomplishments	2
Conclusions	3
Federal Managers’ Financial Integrity Act.....	3
Corrective Actions	4
SECTION A: FINDINGS, RECOMMENDATIONS, AND CORRECTIVE ACTIONS	5
Finding 1: Accomplishment of Workplace Inspections.....	5
Synopsis.....	5
Discussion of Details	6
Audit Results	7
Recommendations and Corrective Actions	14
Finding 2: Recording and Reporting Shore Workplace Inspections	18
Synopsis.....	18
Discussion of Details	18
Audit Results	19
Recommendations and Corrective Actions	21
SECTION B: STATUS OF RECOMMENDATIONS	23
EXHIBIT A: BACKGROUND	25
EXHIBIT B: SCOPE AND METHODOLOGY	28
EXHIBIT C: ACTIVITIES VISITED AND/OR CONTACTED	32
APPENDIX 1: MANAGEMENT RESPONSE FROM COMMANDER, NAVY INSTALLATIONS COMMAND	35
APPENDIX 2: MANAGEMENT RESPONSE FROM COMMANDER, NAVAL SAFETY CENTER/CHIEF OF NAVAL OPERATIONS SPECIAL ASSISTANT FOR SAFETY MATTERS	41

Executive Summary

Overview

The U.S. Secretary of the Navy has identified Navy personnel safety as one of his top priorities. In support of this priority, the Chief of Naval Operations and the Commandant of the Marine Corps jointly developed the “Department of Navy Safety Vision for 2009 and Beyond.” It highlights sustained mishap reduction efforts toward the goal of establishing the Department of the Navy as a world-class safety organization.

According to the U.S. Navy Occupational Safety and Health Program “Fiscal Year 2010 Annual Report,” the Navy experienced more than 4,300 documented mishaps¹ totaling at least \$212 million in workers’ compensation costs, in Fiscal Year 2010. The Office of the Chief of Naval Operations Special Assistant for Safety Matters (OPNAV² (N09F)) is responsible for issuing policy on the total Navy Safety and Occupational Health Program and overseeing mishap reduction efforts. The Navy’s Safety and Occupational Health policy outlines an aggressive and comprehensive program to include: (1) compliance with applicable standards; (2) inspection of all workplaces by qualified inspectors at least annually; and (3) prompt abatement of identified hazards through engineering or administrative controls. This audit focused on the workplace inspection program, which is necessary for the timely identification and correction of safety deficiencies to ensure safe and healthful workplaces for Navy employees. OPNAV (N09F) requires that all Navy activities conduct workplace inspections at least annually³ and take appropriate actions to abate or correct identified safety deficiencies.

Commander, Navy Installations Command (CNIC) is responsible for providing workplace inspections to activities receiving base operating support safety services across 79 Navy installations. In cases where Echelon II commands and activities are mission-funded for Occupational Safety and Health, the commands and activities typically perform their own workplace inspections. CNIC selected a contractor-developed proprietary information management system, the Enterprise Safety Application Management System (ESAMS), to manage safety and occupational health program data. ESAMS is a centralized database that CNIC uses to manage and record safety program requirements, including training, mishap reporting, hazard analysis, inspection scheduling, and deficiency notification and tracking. In addition to CNIC, Naval

¹ Mishaps are any unplanned or unexpected event causing death, injury, occupational illness, and include days away from work, job transfer or restriction, and material loss or damage.

² During audit verification, references to Chief of Naval Operations (N09F) were changed to OPNAV (N09F) by OPNAV Instruction 5100.23G-Change 1, Transmittal 1, dated 21 July 2011.

³ Higher hazard areas require more frequent inspections.

Education and Training Command, Naval Criminal Investigative Service, and Naval Facilities Engineering Command also have ESAMS platforms; however, OPNAV (N09F) does not require that it be used for safety and occupational health management.

Our audit began on 17 December 2010 and concluded on 6 January 2012. The conditions identified in this report existed as of Fiscal Year 2011.

Reason for Audit

This audit was performed at the request of the Deputy Assistant Secretary of the Navy, Safety, who expressed concerns that workplace inspections were not being completed. Workplace inspections are one of three levels of inspections intended to identify deficiencies that need correcting to protect personnel and meet regulatory requirements. This audit topic was also identified as a priority in the Fiscal Year 2010 Department of the Navy Risk and Opportunity Assessment Report.

The objective of this audit was to verify that the Navy has an effective safety and occupational health assessment process that results in: (1) completion and reporting of required assessments (i.e., workplace inspections) to the next level in the chain of command; and (2) necessary corrective actions, including implementing needed prevention/remediation (abatement) strategies.

Our audit scope was limited to Navy shore activities within the continental United States as identified to us by the various Echelon II commands and CNIC. The audit focused specifically on the shore workplace inspection process, including reporting and tracking of associated deficiencies, at selected activities within four CNIC continental United States regions during Fiscal Years 2008 through 2010.⁴

Noteworthy Accomplishments

During our audit, we found that CNIC was performing a “Needs Assessment” of their host commands and tenant activities to determine which Navy activities need the various safety and occupational health services they provide, including but not limited to workplace inspections. Results of this assessment should help CNIC identify resources required to fulfill requests for service and assist in the development of their Program Objectives Memorandum and Budget Estimate Submission.

⁴ The audit excluded Reserve activities and Voluntary Protection Program Star activities, a Department of Labor Occupational Safety and Health Administration program with stringent workplace oversight requirements.

Conclusions

We determined that the CNIC regions we reviewed did not have effective processes and procedures in place to ensure that workplace safety and occupational health inspections were conducted annually for tenant activities.

We selected activities with a higher probability⁵ of not having workplace inspections performed. These results are not projectable to the population of Navy commands. Our audit work included two samples. In the first sample, we found that 23 of the 30 activities we reviewed (77 percent) had workplace inspections completed and 7 of 30 (23 percent) did not. For the second sample, we found that 7 of the 24 activities we reviewed (29 percent) had workplace inspections completed while 17 of 24 (71 percent) did not. The two samples combined indicate that 24 of the 54 activities we reviewed (44 percent) had not been inspected. For those activities that had been inspected, we found that the safety deficiencies identified during completed workplace inspections were being corrected or abated.

We also noted several issues affecting the overall efficiency of workplace inspection processes. Most significantly, we found that CNIC regions could not readily identify all activities needing their services. They also did not have sufficient records of host/tenant communication addressing either what safety services (workplace inspections) would be provided, or a tracking method for services that were denied. Additionally, responsible safety personnel at CNIC stated that they were unable to complete workplace inspections for each tenant activity due to limited personnel resources. We also found that for the Echelon III and IV commands we reviewed, Echelon II oversight requirements were limited to 3-year command evaluations.

Further, we found that the visibility of reported deficiencies was hampered due to lack of standardized recording and reporting procedures. Lastly, we found that differing methods for recording workplace inspection data in the ESAMS may obscure CNIC's true workload.

Federal Managers' Financial Integrity Act

The Federal Managers' Financial Integrity Act of 1982, as codified in Title 31, United States Code, requires each Federal Agency head to annually certify the effectiveness of the agency's internal and accounting system controls. In our opinion, the conditions noted in this report may warrant reporting in the Auditor General's annual Federal Managers' Financial Integrity Act memorandum identifying management control weaknesses to the Secretary of the Navy.

⁵ Higher probability activities, are those reviewed that did not include or appear to include associated data in ESAMS.

Corrective Actions

To ensure that safety and occupational health workplace inspections are being completed for Navy Shore activities, we made recommendations to CNIC and to OPNAV (N09F).

We recommended that CNIC develop and implement methods to identify tenant activities needing base operating support services; and maintain sufficient records of communications with tenant activities specifying services that are being provided to include workplace inspections, and instances of services denied. We also recommended that CNIC require Regional Safety Offices to develop a plan of action for performing workplace inspections for activities denied services for safety, and spaces not currently being inspected annually.

To facilitate oversight of safety and occupational health workplace inspections, we recommended that OPNAV (N09F)/Commander, Naval Safety Center coordinate with the Deputy Assistant Secretary of the Navy, Safety to determine the degree of oversight and reporting of workplace inspection results.

To standardize reporting and recording of workplace inspection results we made recommendations to CNIC) and OPNAV (N09F)/Commander, Naval Safety Center.

We recommended that CNIC standardize the method for conducting workplace inspection and reporting workplace inspection data in the Enterprise Safety Application Management System.

Finally, we recommended that OPNAV (N09F)/Commander, Naval Safety Center direct Navy commands and activities to use one standardized system and methodology to record inspections and deficiencies.

Actions planned by the applicable commands meet the intent of Recommendations 1-6. Recommendations 1-6 are considered open pending completion of the planned corrective actions.

Section A:

Findings, Recommendations, and Corrective Actions

Finding 1: Accomplishment of Workplace Inspections

Synopsis

The Commander, Navy Installations Command (CNIC) regions we reviewed did not have effective processes and procedures in place to ensure that safety and occupational health workplace inspections were conducted annually for tenant activities. Chief of Naval Operations Instruction (OPNAVINST) 5100.23G, “Navy Safety and Occupational Health Program Manual,” issued 30 December 2005, requires that workplace inspections be conducted at least annually.⁶ In our first sample, we found that 77 percent of the activities we reviewed (23 of 30) were being inspected and 23 percent (7 of 30) were not. Conversely, in our second sample 29 percent (7 of 24) were being inspected and 71 percent (17 of 24) were not being inspected. Combined, these two samples show that 30 of the 54 activities reviewed (56 percent) were being inspected and 24 of the 54 (44⁷ percent) had not completed required workplace inspections. This occurred for several reasons:

- (1) CNIC could not identify all activities potentially needing safety services;
- (2) CNIC and activities did not maintain sufficient documentation of communication with tenants specifying services to be provided by CNIC Regional Safety Offices, or records of service request and denials;
- (3) CNIC and activities stated that they did not have sufficient resources to perform workplace inspections; and
- (4) Subordinate commands were not required to report workplace inspection results to their Echelon II command.

These issues adversely affect the efficiency and effectiveness of workplace inspections. If safety and occupational health workplace inspections are not performed as required, the Navy misses opportunities to identify and abate safety issues in a timely manner and avoid potentially costly mishaps and hazards. Within Navy Region Southwest, 6,638 deficiencies were identified for 10 installations between calendar years 2006 to 2011, and about half of these involved electrical, fire, or life safety issues. This example

⁶ Higher hazard areas require more frequent inspections.

⁷ We selected activities with a higher probability of not having workplace inspections performed. These results are not projectable to the population of Naval commands.

shows the quantity and type of deficiencies found when workplace inspections are completed. Were these workplace inspections not performed, then these deficiencies may not have been identified, abated, or corrected to prevent potential mishaps.

Discussion of Details

Background/Pertinent Guidance

At the beginning of Fiscal Year 2004, the Navy consolidated and regionalized administrative service delivery, including safety services, by establishing CNIC. As an Echelon II command under the Chief of Naval Operations, they were assigned to be the single Navy point of contact responsible for shore installation management, including policy and program execution. The new reorganization placed ownership of land and buildings under them.

CNIC currently comprises 79 shore installations worldwide in 11 regions. Six of the 11 regions are within the continental United States and include 61 of the 79 installations. Our audit scope included 4 of the 6 continental United States regions. These 4 regions comprise 54 of the 61 continental United States installations, or about 89 percent of all continental United States installations. As part of its installation management responsibilities, CNIC was to provide designated core services to tenant activities⁸ receiving base operating support services via its regionalized offices. Per CNIC Instruction 5100.3, these designated core services include safety management and workplace inspection services.

When CNIC was first establishing its service regions in Fiscal Year 2004, many installation commands divested their safety personnel assets to CNIC. In some cases, commands retained safety assets that were integral to their mission and transferred funding and safety personnel that were not. These transfers were made with the understanding that any safety program gaps created by the transfers could be addressed through support agreements with the CNIC. OPNAVINST 5100.23G, "Navy Safety and Occupational Health Program Manual," requires regional safety service providers or those commands with their own safety staffs to plan, conduct, and document workplace inspections of all buildings, grounds, facilities, materials, equipment, devices, operations, and conditions to ensure compliance with applicable policies, laws, regulations, and standards. The instruction requires that qualified safety personnel inspect all workplaces at least annually.⁹ In addition, OPNAVINST 5100.23G requires that CNIC regions providing base operating support-funded safety services and activities receiving those services to establish written agreements (i.e., Memorandums of Understanding) that specify the services CNIC will provide and conditions under which they are provided.

⁸ Tenant commands are also known by CNIC as "receivers" per its internal instruction, CNIC Instruction 5100.3, "Base Operating Support Services, dated 2 August 2010.

⁹ High-hazard areas must be inspected more frequently based on an assessment of the potential for injuries, occupational illnesses, or damage to Navy property. (High-hazard areas include industrial operations, medical, heavy equipment handling, construction, and toxic/hazardous material handling).

For each shore activity not receiving base operating support safety services from their cognizant CNIC Host Installation, the OPNAV (N09F) instruction requires the activity to have a safety organization, “staffed and organized commensurate with the mission and functions of the command.” The OPNAV instruction states that “a [qualified] safety professional must head the safety organization” and have the authority, responsibility, and visibility to manage and represent effectively the activity’s safety program.

Audit Results

To evaluate the effectiveness of the Navy’s workplace inspection program and determine whether workplace inspections were being performed, we contacted and/or visited 54 shore-based Navy activities. Our audit work included two samples. The first sample of 40 activities was randomly selected from a sample universe of 370, within 4 judgmentally selected Commander, Navy Installations Command regions. Although the Enterprise Safety Application Management System (ESAMS) has a data field for a unit identification code (UIC), the codes for the sample universe were not initially visible in ESAMS. Additionally, we found that 10 of the 40 activities in the sample were disestablished, Reserve units, or did not occupy a physical space. This reduced the original sample of 40 selected activities to 30 for review.

The second sample of 24 targeted activities was identified by the regions as not receiving workplace inspections. The second sample was completed as a result of issues with data visibility in ESAMS, which is discussed in Finding 2. See Exhibit B for sampling methodology details.

We contacted and/or visited activities in four continental United States CNIC regions: Navy Region Mid-Atlantic, Naval District Washington, Navy Region Southeast, and Navy Region Southwest (see Exhibit C). These regions represent 89 percent of all continental United States installations. We interviewed regional safety managers and safety specialists, and command safety personnel including safety officers and collateral duty safety personnel; obtained and analyzed available supporting documentation such as OPNAV 5100.2 deficiency forms; physically observed abated or corrected deficiencies; and compared information to data reported in ESAMS at the date of our review. We also verified whether activities had at least 3 consecutive years of workplace inspections performed between Fiscal Years 2008 through 2011 and whether their workplace inspection records had been maintained for 5 years. Additionally, we verified inspector qualifications against OPNAVINST 5100.23G criteria. Based on this audit work, we found in the first sample of 30 activities that 77 percent (23 of 30) were receiving safety inspections from CNIC or performing the required workplace inspections on their own, and 23 percent (7 of 30) were not receiving or performing workplace inspections as required. For the second sample that included 24 activities, 29 percent (7 of 24) were

being inspected and 71 percent (17 of 24) were not receiving or performing required workplace inspections.

When combined, 30 (23+7) of 54 activities we reviewed (56 percent) were receiving or performing required workplace inspections. The remaining 24 activities (44 percent¹⁰) were not receiving or performing required workplace inspections. For details, see Tables 1, 2, and 3. For those activities that had been inspected, we determined that the activities were sufficiently tracking, abating, and/or correcting the identified safety deficiencies. For example, in Fiscal Year 2010, we identified 1,622 deficiencies for the activities in Sample 1, which were being tracked by the individual commands until they could be abated and/or corrected.

Region	No. of Activities	Inspected	Not Inspected	Percent Inspected	Percent Not Inspected
Commander, Navy Region Southwest	12	11	1	92%	8%
Commander, Navy Region Mid-Atlantic	7	3	4	43%	57%
Commander, Naval District Washington	6	5	1	83%	17%
Commander, Navy Region Southeast	5	4	1	80%	20%
Totals	30	23	7	77%	23%

¹⁰We selected activities with a higher probability of not having workplace inspections performed. These results are not projectable to the population of Naval commands.

Table 2. Sample 2: Activities Reviewed					
Region*	No. of Activities	Inspected	Not Inspected	Percent Inspected	Percent Not Inspected
Commander, Navy Region Southwest	12	0	12	0%	100%
Commander, Naval District Washington	10	7	3	70%	30%
Commander, Navy Region Southeast	2	0	2	0%	100%
Totals	24	7	17	29%	71%

*Commander, Navy Region Mid-Atlantic stated they were unable to easily identify commands not receiving inspections.

Table 3. Combined Samples							
Region	Number of Activities Sample 1	Number of Activities Sample 2	Total	Total Inspected	Total Not Inspected	Percent of Total Inspected	Percent of Total Not Inspected ¹¹
Commander, Navy Region Southwest	12	12	24	11	13	46%	54%
Commander, Navy Region Mid-Atlantic	7	0	7	3	4	43%	57%
Commander, Naval District Washington	6	10	16	12	4	75%	25%
Commander, Navy Region Southeast	5	2	7	4	3	57%	43%
Totals	30	24	54	30	24	56%	44%

Additionally, as discussed below, we identified several inefficiencies that hampered effective management of the Navy’s workplace inspection processes. As a result of these inefficiencies and based on the number of workplace inspections that had not been performed, we conclude that the Navy may have missed opportunities to timely identify and abate safety issues.

¹¹We selected activities with a higher probability of not having workplace inspections performed. These results are not projectable to the population of Navy commands.

Factors Affecting Accomplishment of Shore Workplace Inspections

1. Identifying Tenants Requiring Services. During our audit work, we experienced difficulties identifying activities by UICs. Based on discussions with CNIC regional personnel and our observations, we determined that CNIC did not have sufficient accountability of the activities it services. CNIC regions did not have an effective process for identifying new or reorganized tenant activities. As a result, they were unaware of all activities requiring base operating support safety services. CNIC's internal instruction, CNIC Instruction 5100.3, "Base Operating Support Safety Services" issued 2 August 2010, outlines the steps taken to provide safety services. The first step states: "Supplier validates customer (Receiver) list to identify all eligible customers of BOS [base operating support] Safety per this instruction. Annual baseline customer lists are provided to regions for validation and update by CNIC Headquarters using annual extracts from the Electronic Navy Housing database." However, we were advised by regional personnel that the housing list did not identify all activities, nor did it contain complete and useful information, such as claimants, physical locations, and contact information. They stated that they must use multiple sources and methods to identify activities and locations, because the Navy does not have a single complete listing of activities by UIC. The inability to identify UICs is not unique to CNIC, but is a Navy-wide problem as reported and addressed in Naval Audit Service report N2011-0004, "Managing Navy Unit Identification Codes," dated 10 October 2010. This report stated: "UICs were not effectively managed, and the Navy did not have a complete and accurate list of UICs." The report further stated: "UIC data must be complete and accurate because it is an integral part of Navy and other Department of Defense (DoD) management information systems."

Once the activities are identified, Step 2 determines the services each customer requires and states, "Supplier notifies all eligible customers and invites those requesting services (Receivers) to participate in the needs assessment." We recognize that CNIC is currently performing this "needs assessment" to determine what various safety and occupational health services each activity requires, including but not limited to workplace inspections. However, based on interviews with cognizant CNIC personnel, regions are still unable to identify all tenant activities requiring services. As a result, some safety personnel interviewed stated they are querying those activities they already service to perform the needs assessments, thus missing the other commands that are eligible but are not receiving services.

2. Host/Tenant Communications. CNIC did not have sufficient records of their communications with tenant activities receiving services or those denied service as follows.

Tenants Serviced: At the time of our review, OPNAVINST 5100.23G, dated 30 December 2005, required that CNIC regions providing base operating support

services establish written agreements (i.e., Memorandums of Understanding) with receiving activities. We found that of the 30 activities reviewed in Sample 1, CNIC regions had not documented agreements with any of the 17 that received base operating support services. CNIC indicated that there was no DoD requirement to use Memorandums of Understanding and they had requested that the OPNAV instruction be revised to not require service agreements for activities receiving non-reimbursable services. Further, CNIC stated that services the regions provide are outlined in CNIC Instruction 5100.3, dated 2 August 2010. However, since the level of safety services provided can vary by activity, a more formalized method is needed to make activities fully aware of what support services they will actually be receiving from CNIC, and to establish an audit trail.

We asked CNIC's regional safety personnel how they identified which activities they service and whether a given activity specifically received workplace inspections. They stated that they reviewed ESAMS to see whether an inspection had been done previously. CNIC also admitted a need to improve their documentation of communications with tenant activities, and advised that they are currently performing a needs assessment to determine activities wanting safety services. However, this did not ensure that the activity would actually receive specific services, such as workplace inspections. CNIC advised that these solicitations for services will then be recorded in ESAMS.

Office of Management and Budget (OMB) Circular A-123 states that "management should have a clear, organized strategy with well-defined documentation processes that contain an audit trail...so that someone not connected with the procedures can understand the assessment process." Communications with activities regarding services and the scope of services that CNIC will provide should be documented for each activity receiving service. This will help to establish accountability and clarify who is to perform the annual workplace inspection (i.e., CNIC or the activity itself). In addition to specifying the safety services to be supplied and the conditions under which they are provided, CNIC should advise activities of specific spaces excluded from their review. Including this information would assist in clarifying the confusion expressed to us during our audit over inspection responsibilities for mechanical rooms, rooftops, and other spaces that are also serviced by Naval Facilities Engineering Command.

Tenants Not Serviced: As previously noted, per CNIC Instruction 5100.3, CNIC requires tenant activities to request base operating safety services. These services are not provided automatically. However, a request does not ensure that tenants will receive services and some tenants may not be aware that they need to or can request services from the Region. CNIC does not maintain sufficient records of services requested, cases when service is denied, or reasons for denial of service. During our audit we identified several Naval Education and Training Command commands that

CNIC had denied servicing. A disagreement between Naval Education and Training Command and CNIC concerning who should perform the workplace inspections has been ongoing since about Fiscal Year 2004. Naval Education and Training Command advised that while they have full-time safety professionals in San Diego, CA and Norfolk, VA, these personnel are assigned specifically to cover high-risk training exercises. CNIC provides workplace inspections to Naval Education and Training Command activities located on most installations except those installations surrounding these two areas, where Naval Education and Training Command safety personnel are located. CNIC contends that since Naval Education and Training Command has its own mission-funded safety personnel in those locations, Naval Education and Training Command is responsible for conducting its own workplace inspections. The governing instruction, OPNAVINST 5100.23G, dated 30 December 2005, states that Naval Education and Training Command is mission-funded to provide safety services specifically for high-risk training. However, this should not exclude them from receiving workplace inspection services for areas not involving high-risk training from the cognizant CNIC region.

In summary, documented agreements such as Memorandums of Understanding, as well as documentation and tracking of service requests and denials, would expand visibility of services provided and identify those activities not being serviced or receiving annual workplace inspections. This information would create required audit trails and enable Echelon II commands and activities to better manage their workplace inspection processes. Also tracking and trending of denied services would assist CNIC in allocating resources, and supporting requests for increased funding.

3. Availability of Resources. Per CNIC Regional personnel interviewed, CNIC resources are not available to fully support all activities that need safety services. We noted that for Fiscal Year 2010, CNIC was funded at a Common Output Level 3, which states workplace inspections for administrative spaces may not be performed.¹² The Occupational Safety and Health Administration require annual workplace inspections of all buildings and facilities. OPNAV 5100.23G states that workplace inspections will either be performed by regional safety providers or activity commanding officers with their own safety staffs. In the absence of workplace inspection services from CNIC or higher Echelon commands, we found that activities are not equipped with staff to meet the inspection requirements. Qualified Inspectors must complete eight courses designated by OPNAV. While we found that the CNIC regional inspectors included in our samples were qualified to perform workplace inspections, activities that are not mission funded for safety are typically only staffed with collateral duty Safety Officers. According to OPNAVINST 5100.23G, Collateral Duty Safety Officers are not required to be qualified inspectors and,

¹² Although our sampling methodology was not intended to focus on administrative spaces, the majority of spaces we reviewed fell into this category. This likely occurred because we excluded Voluntary Protection Program Star sites, since the Voluntary Protection Program has stringent criteria for certification, including the performance of workplace inspections. Industrial-type activities are often participants in the Voluntary Protection Program.

therefore, are not qualified to perform workplace inspections. Also, we were advised by regional personnel that, in some cases, the ability of the region to provide all desired safety services may be affected by supplemental requests from installation commanding officers. Examples of additional services requested by commanding officers include pier and zone inspections and monitoring of ammunition movements.

If CNIC is unable to provide annual inspections for all administrative spaces because of limited resources or supplemental requests, and collateral duty safety officers are not qualified to perform workplace inspections, then in our opinion, CNIC should create a plan of action that prioritizes and communicates the workplace inspections it will perform so that customers are aware of any gaps in service. This will assist with ensuring workplace inspections are performed annually, in accordance with Occupational Safety and Health Administration and OPNAV requirements.

4. Echelon II Command Oversight. OPNAVINST 5100.23G, dated 30 December 2005, required a minimum 3-year command evaluation; however, it does not require workplace inspection results be reported to Echelon II commands. While it may not be practical for Echelon II commands or Immediate Superiors in the Chain of Command to monitor all safety deficiencies, in our opinion, the chain of command should be aware of the status of subordinate's workplace deficiencies. This awareness would facilitate communications with OPNAV N09F/Commander, Naval Safety Center and aid Deputy Assistant Secretary of the Navy, Safety in ensuring the safety posture of the Navy's workplaces. We also conclude that more proactive oversight from Echelon II commands and individual command management could significantly improve the Navy's workplace inspection program.

Effect

Workplace inspections are preventive measures; if they are not performed, Navy personnel may be exposed to various hazards that may lead to preventable mishaps and claims against the Navy. During our analysis of identified workplace deficiencies in the Southwest Region, we noted approximately 6,638 deficiencies for calendar years 2006 through 18 May 2011, and about 49 percent involved electrical, fire, and life safety issues. This example shows the quantity and type of deficiencies found when workplace inspections are completed. Were these workplace inspections not performed then these deficiencies may not have been identified, abated, or corrected to prevent possible mishaps. An effective workplace inspection program across the Navy would help ensure the safety health and well-being of Navy personnel and decrease costs associated with workplace injuries and occupational illnesses.

Recommendations and Corrective Actions

Our recommendations, summarized management responses, and our comments on the responses are presented below. The complete text of the management responses are in the Appendices.

We recommend that Commander, Navy Installations Command:

Recommendation 1. Develop and implement methods to effectively identify all tenant activities potentially needing base operating support services, including newly established or reorganized activities.

Management response to Recommendation 1. Concur. Commander, Navy Installations Command host installations identify all eligible tenants on an annual basis and notify them of the availability of base operating support Safety services using the Commander, Navy Installations Command N9 Enterprise Military Housing database. Newly or reorganized activities discovered in the housing database are validated by Region/Installation Program Managers and the Enterprise Safety Application Management System help desk to ensure that all host/tenant activities are documented in the Enterprise Safety Application Management System. Quarterly, Commander, Navy Installations Command Headquarters Safety (N35) will track documentation of contact with tenant activities and monitor compliance with this annual requirement.

Naval Audit Service comments on responses to Recommendation 1. In subsequent communications, management indicated they would also reconcile the Enterprise Safety Application Management System to the updated host/tenant activity lists to identify tenants who are potentially eligible for base operating support services but were not contacted and are not receiving services. Further, management indicated 30 July 2012 as the target completion date. Actions planned by management to track documentation of contact with tenant activities and reconcile the Enterprise Safety Application Management System to updated host/tenant activity lists meet the intent of the recommendation, and this recommendation is considered open.

Recommendation 2. Maintain (a) records of communications showing tenant activity requests for services and denials of service, and (b) documented service agreements (such as Memorandums of Understanding) with tenant activities receiving base operating support safety and occupational health workplace inspection services, detailing what services will be provided, frequency of services to be provided, spaces excluded from inspection; and other pertinent information.

Management response to Recommendation 2(a). Concur. Commander, Navy Installations Command Host Installations conduct a needs assessment of receiving activities requesting base operating support Safety services as a component of the annual command self-assessment process. This needs assessment is documented in the Enterprise Safety Application Management System and includes documentation of Receivers not requesting base operating support Safety services.

Naval Audit Service comments on responses to Recommendation 2(a). In subsequent communications, management indicated that the needs assessment is performed on tenants that respond to the notification of base operating support availability and choose to receive services. They further stated that documentation of tenant acceptance or rejection of available base operating support Safety Services is electronically scanned and uploaded into the Enterprise Safety Application Management System by the supplier. In this communication, management indicated a target completion date of 30 July 2012. Based on further communications with management, it is our understanding that Commander, Navy Installations Command does not deny services to any tenant command if services have not been requested. When services are requested, documentation will be retained, and actions on that request are tracked. In response to Recommendation 3, Commander, Navy Installations Command noted that when there are service gaps, they will provide written notification, recommend alternatives to remove gaps, and inform receivers of their responsibility to resolve those gaps. Actions planned by management to electronically scan and upload official documentation of contact into the Enterprise Safety Application Management System for tenant activities that: 1) request service, 2) do not request service, or 3) are denied service after requesting it as discussed in the finding, meet the intent of the recommendation and this recommendation is considered open.

Management response to Recommendation 2(b). Concur. Support agreements are established when providing reimbursable services. The Support Agreement Data Application is used to develop, manage, and document support agreements. Steps will be taken by Commander, Navy Installations Commands Headquarters N35 to track and monitor the status of compliance with support agreement requirements.

Naval Audit Service comments on responses to Recommendation 2(b). In subsequent communications Commander, Navy Installations Command agreed to include in reports to Commanding Officers of tenant activities who receive non-reimbursable safety services: 1) services that will be delivered, 2) frequency of services, and 3) spaces excluded from inspection, and that Commander, Navy Installations Command will maintain copies of the report. These actions were agreed to on 8 March 2012. Further, management

indicated 30 July 2012 as the target completion date. Actions planned in subsequent communications by Commander, Navy Installations Command meet the intent of the recommendation, and the recommendation is considered open.

Recommendation 3. Require Regional Safety Offices to develop a plan of action that prioritizes and communicates when workplace inspections will be performed to include activities denied base operating support services for safety.

Management response to Recommendation 3. Concur. Workload requirements are projected utilizing validated needs assessments and established service levels based on capability and operational risk management principles to schedule inspections. It may be necessary to lower the level of common-service support to established service levels of existing funds. These reductions are implemented uniformly across all receivers. To execute workload requirements based on capability and operational risk management principles, inspections may be scheduled into the next fiscal year. Receivers are notified immediately of service gaps and their responsibility to resolve those gaps.

Naval Audit Service comments on responses to Recommendation 3. In subsequent communications, management indicated 30 July 2012 as the target completion date for this action. The written notification will recommend alternatives to remove gaps, and inform receivers of their responsibility to resolve those gaps. This will assist with ensuring workplace inspections are performed annually in accordance with Occupational Safety and Health Administration and Chief of Naval Operations requirements. Actions planned by management meet the intent of the recommendation, and the recommendation is considered open.

We recommend that Office of Chief of Naval Operations Special Assistant for Safety Matters/Commander, Naval Safety Center:

Recommendation 4. Coordinate with the Deputy Assistant Secretary of the Navy, Safety to determine the degree of management oversight and reporting needed to ensure effective and efficient management of workplace inspection results, and revise Office of the Chief of Naval Operations Instruction 5100.23G accordingly.

Management response to Recommendation 4. Concur. The applicable passages of Chapter 9 of Office of the Chief of Naval Operations Instruction 5100.23G will be strengthened regarding the degree of management oversight and reporting required to ensure effective and efficient management of workplace inspection results. This revision is planned for release no later than 1 April 2013, and a 6-month status reports on progress will be provided beginning on 1 July 2012.

Naval Audit Service comments on response to Recommendation 4.
Actions planned by management meet the intent of the recommendation and the recommendation is considered open.

Finding 2: Recording and Reporting Shore Workplace Inspections

Synopsis

CNIC does not require standardized recording and reporting of workplace inspection results in ESAMS. As a result, Navy Echelon II commands and CNIC personnel cannot efficiently use workplace inspection information recorded in ESAMS. Specifically, they cannot efficiently identify, track, and monitor resolution of activity safety deficiencies as required by OPNAVINST 5100.23G, “Navy Safety and Occupational Health Program Manual” issued 30 December 2005, or accurately account for and trend high-risk deficiencies. Additionally, in some cases, the method of recording workplace inspections (i.e., by parent UIC or building number) potentially obscured CNIC’s actual workload. Furthermore, audit trails required by OMB Circular A-123 were not readily accessible. Recording methodologies and the method of reporting risk levels for safety deficiencies (hazards) were not standardized, in our opinion, due to insufficient control procedures.

Discussion of Details

Background/Pertinent Guidance

According to OPNAVINST 5100.23G, “Navy Safety and Occupational Health Program Manual” issued 30 December 2005, “it is essential that the Navy develops and maintains programs to eliminate or control all identified hazards in a systematic manner.” OPNAVINST 5100.23G requires CNIC regions and inspected activities to: (1) conduct followup workplace inspections to verify that safety deficiencies are abated and corrected, and (2) document these followup actions on OPNAV Form 5100/12, Deficiency Notices. Further, it requires that safety deficiencies be assigned a risk assessment code (RAC), which is a combined measure of the potential hazard severity and the mishap probability. RAC codes range from 1 (critical) to 5 (negligible). Hazard Abatement Plans are required for all RAC 1, 2, and 3 — critical, serious, and moderate deficiencies, respectively.

CNIC currently uses ESAMS to manage its safety and occupational health programs data. ESAMS can be used to record all information from the OPNAV 5100/12 Deficiency Notices, and the resulting records may suffice as the activity Hazard Abatement Plan. Currently, per direction from the Chief of Naval Operations, Navy activities are required to use ESAMS to manage their command motorcycle safety program. Only CNIC requires use of ESAMS to record workplace inspection data; however, CNIC guidance is not considered official guidance for tenant activities that are not in CNIC’s direct chain of command.

OMB Circular A-123 states that “management should have a clear, organized strategy with well-defined documentation processes that contain an audit trail...so that someone not connected with the procedures can understand the assessment process.” OMB Circular A-123 also states that control procedures include policies, procedures and mechanisms in place to help ensure that agency objectives are met. Examples of these controls include appropriate documentation and access to that documentation.

Audit Results

Based on auditor review of data in ESAMS for the 30 activities included in Sample 1, and supported by various audit interviewees, we found several issues affecting how workplace inspection results were recorded and accessed in the ESAMS system. These issues resulted in diminished visibility of data that could adversely impact management’s ability to oversee and control workplace inspection processes and ensure that safety deficiencies are abated or corrected; as well as obscure CNIC’s potential workload.

1. Workplace Inspection Data. We reviewed ESAMS data provided by CNIC. We were initially unable to locate workplace inspection data in ESAMS for 30 activities in Sample 1. During field work, we found 7 were not being inspected and, therefore, had no records in ESAMS; and 2 commands were recording under their own system. Of the remaining 21 of 23 that had been inspected, we were unable to identify any of them in ESAMS due to how the data was entered into ESAMS.

For example, 8 of the 21 had been recorded by the building number versus by the activity UIC. Since a given activity may be located in several different buildings, parts of the activities may have workplace inspections performed at one time while others may not. This condition makes tracking completion of all required inspections difficult for managers. Additionally, in 13 of the 21 activities, involving each of the 4 CNIC regions we sampled, results for the inspections had been consolidated and reported under the parent UICs rather than by the individual command UICs. Varying means of recording data make it difficult to locate data within ESAMS and could hamper management’s ability to effectively oversee the workplace inspection process. These situations occurred because procedures for recording workplace inspection data had not been standardized. Table 4 summarizes these results by region.

Table 4. Recording Workplace Inspection Results		
Region	Reported by Parent UIC	Reported by Building
Commander, Naval Region Southwest	9	1
Commander, Naval Region Southeast	2	2
Commander, Naval District Washington	1	4
Commander, Naval Region Mid-Atlantic	1	1
Total	13	8

We also observed that safety personnel at two different regions (Commander, Naval Region Mid-Atlantic and Commander, Naval District Washington) could not readily identify which activities had been inspected. We also found that some activities had to try different ways of accessing workplace inspection data, such as searching by UIC, building, activity name, or inspector’s name. Further, we found that similar searches produced differing results in cases where the data should have been the same. For example, if data was pulled by activity name, we might find five inspections performed over the 3-year period; however, if data was pulled by the inspector's name for the same period, we may discover that six inspections had been performed for the activity. Similarly, we might find that pulling the data according to the activity UIC might indicate that no inspections had been performed, while pulling by the inspector name and looking at the building number would reveal that the inspections had, in fact, been performed.

As a result, while the ESAMS system is considered notable for its followup and tracking capabilities, audit trails for workplace inspections were often not readily visible. The lack of visible audit trails resulted in the audit team initially identifying 23 of the 30 activities in our first sample as not performing workplace inspections when they had been performed, which led to the need for a second audit sample. We also noted that in cases where the region consolidated and reported results under the parent UIC versus the individual activity UICs, the region may not have full accountability of its actual workload.

2. Recording and Reporting Deficiencies. Based on our interviews with regional safety personnel, critical (RAC 1) deficiencies are not generally documented since, by their nature as high-risk deficiencies, these types of deficiencies require immediate corrective or interim abatement action. When a deficiency could be corrected or abated to a minor or negligible issue (RAC 4 or 5 levels) at the time of inspection,¹³ it was not always considered necessary to officially document the deficiency. In other

¹³RAC 4 and 5 deficiencies are not required to be reported in the Hazard Abatement Plan.

cases, the critical deficiencies were documented, but were instead entered in at the lower, abated RAC level (i.e., RAC 3 (moderate), 4, or 5). However, we contend that by not recording and tracking the original RAC level, the Navy loses visibility of the work efforts and possibly the funding put forth to correct higher priority safety deficiencies, as well as loses the ability to more accurately portray and trend the occurrence of higher risk safety deficiencies.

We note that the Navy has recently worked toward developing a Risk Management Information System¹⁴ that would encompass safety management, including data from the ESAMS. To help standardize recording of workplace inspection information and improve the visibility of all workplace inspections, OPNAV (N09F)/Commander, Naval Safety Center should ensure the Risk Management Information System or another Navy-wide system is implemented.

Effect

In our opinion, inconsistent recording and reporting practices hampers effective oversight of the Navy's safety issues and efforts, and potentially obscures CNIC's actual workload and the severity and nature of deficiencies actually occurring.

Recommendations and Corrective Actions

Our recommendations, summarized management responses, and our comments on the responses are presented below. The complete text of the management responses are in the Appendices.

We recommend that Commander, Navy Installations Command:

Recommendation 5. Standardize the method for reporting workplace inspections and recording the data in the Enterprise Safety Application Management System (i.e., by activity, parent unit identification code, or building) to facilitate use of the data, capture workload accurately, and provide clear audit trails.

Management response to Recommendation 5. Concur. Standardized methodology for recording inspections will be published by the end of third quarter Fiscal Year 2012. It will include a requirement that documented inspections include the command name, physical location, and unit identification code of activity inspected. This will ensure that inspection workload requirements (per needs assessment validation) and inspection performance can be uniformly collected, tracked, and monitored via the Enterprise Safety Application Management System. The target completion date is 30 July 2012.

¹⁴See Naval Audit Service Report N2009-0066, "Risk Management Information System (RMIS) Development," for more information.

Naval Audit Service comments on the response to Recommendation 5.

Actions planned by management meet the intent of the recommendation and this recommendation is considered open.

We recommend that Office of Chief of Naval Operations Special Assistant for Safety Matters/Commander, Naval Safety Center:

Recommendation 6. Direct Navy commands and activities to use one standardized system and methodology to record inspections and deficiencies.

Management response to Recommendation 6. Concur. Developing the Risk Management Information System as directed by the Secretary of the Navy will facilitate unit-level Safety Program management and include the ability to capture workplace inspection results and track abatement action. The projected completion date is 1 October 2014, with 6-month status reports on progress beginning on 1 July 2012.

Naval Audit Service comments on the response to Recommendation 6.

Actions planned by management meet the intent of the recommendation, and the recommendation is considered open.

Section B:

Status of Recommendations

Recommendations							
Finding ¹⁵	Rec. No.	Page No.	Subject	Status ¹⁶	Action Command	Target or Actual Completion Date	Interim Target Completion Date ¹⁷
1	1	14	Develop and implement methods to effectively identify all tenant activities potentially needing base operating support services, including newly established or reorganized activities.	O	Commander, Navy Installations Command	7/30/12	
1	2	14	Maintain (a) records of communications showing tenant activity requests for services and denials of service, and (b) documented service agreements (such as Memorandums of Understanding) with tenant activities receiving base operating support safety and occupational health workplace inspection services, detailing what services will be provided, frequency of services to be provided, spaces excluded from inspection; and other pertinent information.	O	Commander, Navy Installations Command	7/30/12	
1	3	16	Require Regional Safety Offices to develop a plan of action that prioritizes and communicates when workplace inspections will be performed to include activities denied base operating support services for safety.	O	Commander, Navy Installations Command	7/30/12	
1	4	16	Coordinate with the Deputy Assistant Secretary of the Navy, Safety to determine the degree of management oversight and reporting needed to ensure effective and efficient management of workplace inspection results, and revise Office of the Chief of Naval Operations Instruction 5100.23G accordingly.	O	Office of the Chief of Naval Operations Special Assistant for Safety Matters/ Commander, Naval Safety Center	4/1/13	7/1/12

¹⁵ / + = Indicates repeat finding.

¹⁶ / O = Recommendation is open with agreed-to corrective actions; C = Recommendation is closed with all action completed; U = Recommendation is undecided with resolution efforts in progress.

¹⁷ If applicable.

Recommendations							
Finding ¹⁵	Rec. No.	Page No.	Subject	Status ¹⁶	Action Command	Target or Actual Completion Date	Interim Target Completion Date ¹⁷
2	5	21	Standardize the method for reporting workplace inspections and recording the data in the Enterprise Safety Application Management System (i.e., by activity, parent unit identification code, or building) to facilitate use of the data, capture workload accurately, and provide clear audit trails.	O	Commander, Navy Installations Command	7/30/12	
2	6	22	Direct Navy commands and activities to use one standardized system and methodology to record inspections and deficiencies.	O	Office of Chief of Naval Operations Special Assistant for Safety Matters/Commander, Naval Safety Center	4/1/14	7/1/12

Exhibit A:

Background

This audit was requested by the Office of the Assistant Secretary of the Navy (Energy, Installations and Environment) via communication with Naval Audit Service's Assistant Auditor General, Installations and Environment Directorate.

The Office of the Assistant Secretary of the Navy (Energy, Installations and Environment) identified several specific areas of concern involving the Department of the Navy's Safety and Occupational Health Program. The Office of the Assistant Secretary of the Navy's primary concern was that the Navy's Safety and Occupational Health assessment/inspection process lacked oversight and controls to ensure the safety and occupational health of Department of the Navy personnel. Additional concerns were that safety inspectors may not always be properly qualified to inspect or assess Safety and Occupational Health conditions. This audit focused on Commander, Navy Installation Command's Safety and Occupational Health program as it relates specifically to workplace inspections.

As described in Chief of Naval Operations Instruction (OPNAVINST) 5100.23G, "Navy Safety and Occupational Health Program Manual," 30 December 2005, the Navy Safety and Occupational Health program encompasses all safety disciplines, such as aviation safety, weapons/explosives safety, off-duty safety, traffic safety, and occupational safety and health. Chapter 9 of the instruction describes required workplace inspections, command evaluations and oversight evaluations:

Workplace Inspections: Regional safety service providers and activity commands are required to inspect for hazardous and unsafe situations and practices. Safety personnel are required to inspect all workplaces at least annually. Inspectors must meet certain qualifications to perform the safety inspections; if they do not have required qualifications, they are to make arrangements with the appropriate echelon commander to obtain assistance. Inspectors have specific deadlines for reporting deficiencies, and must provide a written report of all findings to the official in charge within 45 days of completing an inspection. Regions and activities are required to conduct followup inspections to verify that corrections have been made or that an action plan has been developed. OPNAV Form 5100/12 is used to document deficiencies as well as followup inspections.

Command Evaluations: Headquarters commands must ensure that evaluations of safety program effectiveness are conducted at all headquarters and subordinate commands at least every 3 years. OPNAVINST 5100.23G provides that Naval

Inspector General program oversight evaluations may be used to meet this requirement.

Oversight Evaluations: The Navy Inspector General conducts shore oversight inspections as deemed appropriate to evaluate compliance with Safety and Occupational Health program requirements. Naval Inspector General is required to provide OPNAV with semi-annual reports that identify safety program areas in need of improvement and recommended actions to enhance the overall Navy-wide safety program.

Commander, Navy Installations Command (CNIC) provides base operating support safety services to commands on 79 discrete installations across the world. Commands on these installations that receive base operating support (as opposed to mission funding) receive services from their cognizant CNIC Navy region.

For each shore activity not receiving base operating support safety services from their cognizant CNIC Navy region, the OPNAV instruction requires the activity to have a safety organization, staffed and organized commensurate with the mission and functions of the command. The OPNAV (N09F) instruction states that “a [qualified] safety professional must head the safety organization and have the authority, responsibility, and visibility to manage and represent effectively the activity’s safety program.”

Safety personnel conducting the workplace inspections must perform the inspections at least annually (or more frequently for higher hazard areas) and must meet certain qualifications to perform the safety inspections. If they do not have the required qualifications, they are to make arrangements with the appropriate echelon commander to obtain assistance. Additionally, regions and activities are required to conduct followup inspections to verify that corrections have been made or that an action plan has been developed.

Deficiencies that cannot be corrected immediately are assigned a Risk Assessment Code, which is an expression of the hazard severity and the mishap probability. Risk Assessment Codes range from critical (1) to negligible (5).

Communication with Management. Throughout the audit, we kept the Office of Assistant Secretary of Navy, Energy, Installations and Environment informed of the conditions noted. Specifically, we held meetings with the audit requestor, from the Office of Assistant Secretary of Navy Special Assistant for Industrial Hygiene, on 8 December 2010. We met with the Deputy Assistant Secretary of Navy (Safety) on 28 March 2011, to update him on audit results and obtain his official endorsement of the audit. We reported the status of audit results to Office of the Assistant Secretary of the Navy by telephone 8 July 2011 and communicated via e-mail on 28 July 2011 and 2 August 2011. We held an initial briefing with Commander, Navy Installations

Command (CNIC–N3) on 16 November 2010 and communicated with them throughout the audit. We met with the Office of Naval Inspector General (N7) on 16 November 2010 and the Chief of Naval Operations Special Assistant for Safety Matters/Commander, Naval Safety Center Executive Assistant on 22 November 2010 to obtain background information. Our exit briefs with the Office of the Assistant Secretary of the Navy and CNIC were held on 8 September 2011.

Exhibit B:

Scope and Methodology

This audit addressed shore-based Navy activities located within the continental United States, excluding U.S. Navy Reserve commands and activities under or applying for the Voluntary Protection Program. The Voluntary Protection Program is a Department of Labor Occupational Safety and Health Administration program with stringent workplace oversight requirements. We reviewed activities with a higher probability of not having workplace inspections performed; specifically, activities that did not include or appear to include associated data in the Enterprise Safety Application Management System (ESAMS) between the calendar years 2008 and 2010. We focused our audit work on four of the Navy's six continental United States regions, which comprise 89 percent of all continental United States installations.

We reviewed applicable Navy guidance, including the Secretary of the Navy's Safety Vision 2009; Chief of Naval Operations Instruction (OPNAVINST) 5100.23G, "Navy Safety and Occupational Health Program Manual," issued 30 December 2005; and Commander, Navy Installations Command, (CNIC) Instruction 5100.3, "Base Operating Support Safety Services." OPNAVINST 5100.23G governs both the shore and afloat Safety and Occupational Health program.

The OPNAV instruction provides that the Navy Safety and Occupational Health program encompasses all safety disciplines, including workplace inspections. The instruction defines a workplace inspection as a comprehensive survey of all or part of a workplace to detect safety and health hazards, as distinguished from routine, day-to-day evaluation and monitoring by local safety personnel. The instruction requires that qualified safety personnel inspect all workplaces at least annually. High-hazard areas must be inspected more frequently based on an assessment of the potential for injuries, occupational illnesses, or damage to Navy property. The instruction defines a workplace as "generally comparable to those of business and industry in the private sector." This would include workplaces for areas involving construction; supply services; civil engineering or public works; medical services; and general office (administrative) personnel.

Sample 1:

To assess the workplace inspection process, we began by identifying the universe of shore commands. Since CNIC is responsible for providing Safety and Occupational Health safety services to those commands receiving base operating support for safety, and because it maintains ESAMS (the Navy's required system for reporting on motorcycle safety), we sought to identify the universe of continental United States shore activities based on CNIC's input. However, we found that CNIC was unable to identify

all installation tenant activities.¹⁸ We also contacted all Echelon II commands to obtain listings of activities under their purview; however, not all Echelon II commands were able to fully identify every activity.

CNIC provided us with a list comprising a universe of 2,034 continental United States shore activities for which they stated that they provided some type of base operating support services. However, this list of activities did not include location information. To make the information useful for sampling purposes, we obtained a copy of the “Housing UIC [Navy Unit Identification Codes] list” provided by CNIC and an Excel version of the Standard Navy Distribution List (SNDL) from the Navy Staff Office Publications Web site, to identify a location for each activity listed. Both the Housing UIC List and the SNDL were used to identify the location for the 2,034 commands. We then used this list to obtain workplace inspection data contained in ESAMS and identified those activities, by UIC, for which we were unable to find at least one workplace inspection documented in ESAMS for the preceding 3-year period, 2008-2010. We then judgmentally selected the four CNIC regions that had the highest number of activities with no inspection data visible in ESAMS and further selected those activities that were within the commuting area of the four CNIC regions listed below:

- Navy Region Southwest, San Diego, CA
- Navy Region Mid-Atlantic, Norfolk, VA
- Naval District Washington, Washington DC
- Navy Region Southeast, Jacksonville, FL

This resulted in a sample universe of 370 activities in these top 4 areas. For these 370 activities, we consulted with the Naval Audit Service statistician to determine the sample size and methodology. Using Microsoft Excel’s Random Seed Generator, we randomly selected 40 activities for review. Of the 40 randomly selected activities, we found that 10 were outside the scope of our review (i.e., disestablished units, Reserve units, or activities that were not assigned an actual physical space). This left us with 30 activities to review. Due to the reduction in the sample size, no projections were carried out. Activities reviewed are included in Exhibit C of this report.

For the 30 individual activities reviewed, we assessed the effectiveness of workplace inspection processes and reporting procedures, including internal controls and oversight. We examined up to 5 consecutive years of data encompassing periods between calendar years 2006 through 2011 year to date as of the dates the specific activities were reviewed

¹⁸ As discussed in Finding 1 of this report, the inability to accurately identify Naval activities is a Navy-wide problem as reported in Naval Audit Service report N2011-0004 “Managing Navy Unit Identification Codes,” dated 10 October 2010. This report stated: “UICs were not effectively managed, and the Navy did not have a complete and accurate list of UICs.” The report further stated: “UIC data must be complete and accurate because it is an integral part of Navy and other Department of Defense (DoD) management information systems.”

(that is, data was reviewed for either 2006 – 2010 or 2007 – 2011). We also determined whether the activities had at least 3 years of workplace inspections performed and whether their workplace inspection records had been maintained for 5 years, and if not, we determined why. We assessed the reliability of data contained in ESAMS by confirming: (1) whether workplace inspections were actually being conducted, and if so, judgmentally sampling deficiencies to physically observe whether abatement and/or corrective actions had been taken; and (2) that the status of deficiencies was accurately identified in ESAMS. We also performed electronic testing of key data elements used to identify workplace inspection data in ESAMS and interviewed agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

We analyzed and evaluated mishap and disability data for both shore-based military and civilian personnel for the prior 3-year period to determine the potential effects of not performing required workplace inspections.¹⁹ Additionally, we interviewed key personnel at the Offices of the Deputy Assistant Secretary of the Navy, Safety; Chief of Naval Operations; Naval Inspector General; Commander, Navy Installations Command; and the Naval Safety Center; as well as safety personnel at four CNIC regions (Navy Region Mid-Atlantic; Naval District Washington; Navy Region Southwest; and Navy Region Southeast).

Sample 2: While reviewing the 30 selected activities identified for Sample 1, we noted that many of the activities had performed workplace inspections; however, the inspections had either been documented under the parent UIC or by building number. As a result, to better target those activities potentially not receiving workplace inspections, a second judgmental sample was pulled based on input obtained from regional personnel.

For this additional sample, we contacted and/or visited 24 activities in the same 4 CNIC regions as Sample 1. We assessed the effectiveness of workplace inspection processes and reporting procedures, including internal controls and oversight. To do so, we examined up to 5 consecutive years of data encompassing periods between calendar years 2006 through 2011 year to date. We also determined whether the commands had at least 3 years of workplace inspections performed and whether their workplace inspection records had been maintained for 5 years, and if not, we determined why.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence

¹⁹ Although we were unable to correlate actual mishap, military disability, and Federal Employees Compensation Act claims to non-performance of a workplace inspection, we note that the purpose of the annual workplace inspection per the OPNAV instruction is to reduce the possibility of mishaps occurring.

obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Finally, we reviewed Naval Audit Service, Department of Defense Inspector General, and Government Accountability Office, and found there were no reports published in the past 5 years covering workplace inspections of Navy safety and occupational workplace inspections; therefore, no followup was required.

Exhibit C:

Activities Visited and/or Contacted

Bureau of Medicine and Surgery, Washington, DC
Bureau of Naval Personnel, Millington, TN
Chief of Naval Operations Special Assistant for Safety Matters (CNO N09F),
Washington, DC / Commander, Naval Safety Center, Norfolk, VA*
Civilian Personnel Management Service, Office of the Secretary of Defense,
Washington, DC
Commander, Naval Air Systems Command, Patuxent River, MD
Commander, Naval Criminal Investigative Service, Washington, DC
Commander, Naval Education and Training Command, Pensacola, FL
Training Support Center Hampton Roads, Virginia Beach, VA
Commander, Naval Facilities Command, Washington, DC
Public Works Department, Norfolk, VA*
Commander, Naval Installations Command (N3), Washington, DC*
Commander, Naval District Washington, Washington, DC*
Commander, Navy Region Mid-Atlantic, Norfolk, VA*
Commander, Navy Region Southeast, Jacksonville, FL*
Commander, Navy Region Southwest, San Diego, CA*
Commander, Naval Sea Systems Command, Washington, DC
Commander, Naval Special Warfare Command, San Diego, CA
Commander, Naval Supply Systems Command, Mechanicsburg, PA
Commander, Office of Naval Intelligence, Washington, DC
Commander, Space and Naval Warfare Systems Command, San Diego, CA
Office of the Secretary of the Navy, (Energy Installations and Environment),
Washington, DC*
Human Resource Service Center East, Portsmouth, VA*
Naval Oceanographic Office, San Diego, CA
Navy Legal Services Office Southwest, San Diego, CA*
Occupational Safety and Health Administration, Washington, DC
Office of Naval Inspector General, Washington DC*
U.S. Fleet Forces Command, Norfolk, VA

Naval activities from Sample 1:

Amphibious Construction Battalion One, Coronado, CA*
Beachmaster Unit 1 Detachment E, Coronado, CA*
Board of Inspections and Survey, Virginia Beach, VA*
Center for Seal Surface Warfare Combat Center, Coronado, CA*
Commander, Littoral Combat Ship Squadron One, San Diego, CA

Construction Battalion Maintenance Unit Detachment 202, Kings Bay, GA*
Expeditionary Warfare Training Group Atlantic, Virginia Beach, VA*
Fallbrook Security Detachment, Fallbrook, CA*
Fleet Industrial Supply Center, San Diego 32213*
Helicopter Maritime Strike Squadron 41, San Diego, CA*
Helicopter Maritime Strike Squadron 75, San Diego, CA*
Helicopter Maritime Strike Squadron 77, San Diego, CA*
Helicopter Squadron Light 43, San Diego, CA*
Helicopter Squadron Light 48, Mayport, FL*
Helicopter Squadron Light 49, San Diego, CA*
Mobile Tactical Operations Center 5, Jacksonville, FL*
Maritime Civil Affairs and Security Training, Virginia Beach, VA*
Naval Computer and Telecommunications Area Master Station Atlantic, Navy Marine
Corps Intranet Detachment, Norfolk, VA*
Naval Expeditionary Riverine Squadron 1, Norfolk, VA*
Naval Expeditionary Riverine Squadron 2, Norfolk, VA*
Naval Sea Systems Command Headquarters, Washington DC*
Naval Sea Systems Command Headquarters and Program and Executive Office,
Washington DC*
Naval Sea Systems Command Program and Executive Office Integrated Warfare
Systems, Washington DC*
Naval Sea Systems Command Logistics, Indian Head, MD*
Naval Special Warfare Group 2 Detachment South, Virginia Beach, VA*
Navy Band Annapolis, Annapolis, MD*
Navy Drug Screening Lab, San Diego, CA*
Navy Food Management Team, Mayport, FL*
Navy Legal Services Office Southeast, Kings Bay, GA*
Office of Naval Inspector General, Washington DC*

Sample 2:

Aviation Survival Training Center, Patuxent River, MD
Center for Information Dominance Learning Site, San Diego, CA
Center for Naval Engineering Learning Site, San Diego, CA
Center for Security Forces Learning Site, San Diego, CA
Center for Service Support Learning Site, San Diego, CA
Center for Surface Combat Systems Detachment West, San Diego, CA
Center for Surface Combat Systems Detachment, San Diego, CA
Commander, Submarine Squadron 20, Kings Bay, GA*
Fleet Industrial Supply Center, Patuxent River, MD
Fleet Logistics Support Squadron 30, San Diego, CA*
Naval Criminal Investigative Service Field Office, Washington DC
Naval District Washington, Washington DC*

Naval Expeditionary Strike Group 3, San Diego, CA*
Naval Maritime Intelligence Center, Suitland, MD
Naval Submarine Support Center, Kings Bay, GA*
Naval Support Activity, Washington DC
Navy Exchange, Washington, DC*
Navy Health Clinic, Patuxent River, MD
Public Works Department, Patuxent River, MD*
Region Legal Service Office, Washington DC
Surface Warfare Officer's School Learning Site, San Diego, CA
Tactical Group One, San Diego, CA
Training and Support Center, San Diego, CA*

*Activities Visited

Appendix 1:

Management Response from Commander, Navy Installations Command



DEPARTMENT OF THE NAVY
COMMANDER, NAVY INSTALLATIONS COMMAND
715 SICARD STREET, SE, SUITE 1000
WASHINGTON NAVY YARD, DC 20374-0140

7510
N00G/12U72230
30 Jan 12

From: Inspector General, Navy Installations Command
To: Assistant Auditor General for Installations and
Environment Audits, Naval Audit Service
Subj: DRAFT NAVAUDSVC REPORT NAVY SAFETY AND OCCUPATIONAL
HEALTH WORKPLACE INSPECTIONS (DRAFT AUDIT REPORT
N2011-NIA000-0044)
Ref: (a) NAVAUDSVC memo 7510 N2011-NIA000-0044 of 6 Jan 12
Encl: (1) CNIC Responses to Subject Draft Report

1. Per reference (a), enclosure (1) is provided. Reference (a) has been reviewed from a Freedom of Information Act (FOIA) perspective and the submitted audit report does not require the "For Official Use Only" (FOUO) designation.

2. The technical point of contact is [REDACTED] CNIC N35, at commercial [REDACTED] or email [REDACTED]. The Audit Liaison is [REDACTED] CNIC OIG, at commercial [REDACTED] or email [REDACTED].

Copy to:
CNIC N3

FOIA (b)(6)

FOIA (b)(6)

Commander, Navy Installations Command (CNIC)
Response to NAVAUDSVC Draft Audit Report
Navy Safety and Occupational Health
Workplace Inspections (Draft Audit
Report N2011-NIA000-0044)

NAVAUDSVC recommends that Commander, Navy Installations Command (CNIC):

Recommendation 1: Develop and implement methods to effectively identify all tenant activities potentially needing Base Operating Support (BOS) services, including newly established or reorganized activities.

Management Response: Concur. CNIC Host installations identify all eligible tenants (Receivers) on an annual basis and notify them of the availability of Base Operating Support (BOS) Safety services in accordance with CNICINST 5100.3, sections 6.g.(2), 7.d.(1), and enclosure (2).

Each year, CNIC Headquarters (HQ) Safety (N35) provides Regions with an updated list of tenant command activities at CNIC Host installations from the CNIC N9 Enterprise Military Housing (eMH) database. Region/Installation Program Directors for Safety use the eMH database information to assist in developing and validating a BOS Safety service customer list each year. Tenants are entered into CNIC-approved safety management system of record, Enterprise Safety Application Management System (ESAMS) by Region/Installation Program Directors to document needs assessment and schedule/document workplace inspections.

Newly established or reorganized activities discovered in eMH database are validated and rectified by Region/Installation Program Managers and ESAMS help desk to ensure that all host/tenant activities in their geographic areas of responsibility are documented in ESAMS.

The following steps will be taken by CNIC HQ N35 to track and monitor status of compliance with annual requirement to document notification of tenant command activities by Region/Installation Program Directors for Safety:

- On or before 1 October of each year, CNIC HQ N35 will provide to Region/Installation Program Directors for Safety an updated list of host/tenant activities in their geographic areas of responsibility from the CNIC eMH database.
- At the end of each quarter of the fiscal year (FY) (every 3 months), CNIC HQ N35 will conduct a data pull from ESAMS using a standardized data query developed by ESAMS System Manager to track documentation of contact with tenant activities and monitor status of compliance with this annual requirement at the HQ level.

Enclosure (1)

- Region Program Directors (RPD) for Safety will also be provided with respective standardized queries to enable self-monitoring and data validation for their geographic areas of responsibility 60 days in advance of quarterly data pulls by CNIC HQ N35 Safety.
- Findings of HQ quarterly data pulls will be posted by the end of the following month on CNIC N3 Gateway 2.0 (G2) team site for compliance monitoring and follow-up by senior management.

Recommendation 2(A): Maintain records of communications showing tenant activity requests for services and denials of service

Management Response: Concur. CNIC Host Installations conduct a needs assessment of receiving activities requesting BOS Safety services as a component of the annual command self-assessment process to establish the BOS Safety service delivery requirements of the Supplier and validate requirements. This needs assessment is documented in ESAMS and includes documentation of Receivers not requesting BOS Safety services.

Requirements conducting and documenting needs assessments are found in CNICINST 5100.3, sections 6.g(1), 6.g.(4), 7.c(3), and 7.d(2).

The following steps will be taken by CNIC HQ N35 to track and monitor the status of compliance with tenant notification and needs assessment documentation requirements:

- At the end of each quarter of the Fiscal Year (FY) (every 3 months), CNIC HQ N35 will conduct a data pull from ESAMS using a standardized data query developed by ESAMS System Manager with the following metrics:

Percentage of identified tenants that were notified of available BOS Safety Services	Total Required (number of tenants identified)
Percentage of notified tenants that have had a needs assessment completed	Total Required (number of tenants notified, including those not requesting services)

- RPDs for Safety will also be provided with respective standardized queries to enable self-monitoring and data validation for their geographic areas of responsibility 60 days in advance of quarterly data pulls by CNIC HQ N35.
- Findings of HQ quarterly data pulls will be posted by the end of the following month on CNIC N3 G2 team space for compliance monitoring and follow-up by senior management.

Recommendation 2(B): Maintain documented service agreements (such as Memorandums of Understanding (MOUs)) with tenant activities receiving Base Operating Support safety and occupational health workplace inspection services, detailing what services will be provided, frequency of services to be provided, spaces excluded from inspection, and other pertinent information.

Management Response: Concur. CNIC establishes Support Agreements (SA) (i.e., Memorandums of Agreement and MOUs) when providing reimbursable services (i.e., not within CNIC's mission, above established common output level standards, receiving activity is mission funded to provide that service to itself). CNIC uses the Support Agreement Data Application (SADA) to develop, manage, and document support agreements.

SA requirements and related BOS Safety processes are found in CNICINST 4000.1A, sections 3, 4.a.(1), and 4.a(12); and CNICINST 5100.3, sections 6.f(4), 7.d(5), and 7.d(6).

The following steps will be taken by CNIC HQ N35 to track and monitor the status of compliance with support agreement requirements:

- At the end of each quarter of the FY (every 3 months), CNIC HQ N35 will conduct a data pull from ESAMS using a standardized data query developed by ESAMS System Manager to review documented workload and determine if any of the services provided could be considered reimbursable. CNIC HQ N35 will then work with Regions and CNIC N8 to verify the nature of those services and that SAs are established, if required per CNICINST 4100.1A.
- RPDs for Safety will also be provided with respective standardized queries to enable self-monitoring and data validation for their geographic areas of responsibility 60 days in advance of quarterly data pulls by CNIC HQ N35.
- Findings of HQ quarterly data pulls will be posted by the end of the following month on CNIC N3 G2 team space for compliance monitoring and follow-up by senior management.

Recommendation 3: Require Region Safety Offices to develop a plan of action that prioritizes and communicates when workplace inspections will be performed to include activities denied Base Operating Support services for safety.

Management Response: Concur. CNIC Region/Installations use validated needs assessments of host and tenants (Receivers) to project workload requirements. CNIC Region/Installations utilize established service levels based on capability and Operational Risk Management (ORM) principles to schedule inspections. When Receiver requests for services exceed Supplier capability, Commanding Officers of Host Installations may find it necessary to lower the level common-service support

to established service levels of existing funds. These reductions are implemented uniformly across all Receivers. To execute workload requirements based on capability and ORM principles, inspections may be scheduled into the next fiscal year. In cases where capability cannot meet all Receiver requests, CNIC Host Installations immediately notify Receivers, evaluate and provide recommendations to eliminate all resulting gaps, and inform Receivers of their responsibility to resolve those gaps.

Requirements, responsibilities, and process for equitable BOS service delivery are found in CNICINST 5100.3, sections 6.b, 6.e(4), 6.f(6), 6.f(7), 6.g(2)(b), 6.h, 7.a(2), 7.b(2), 7.c(4), 7.c(5), 7.d(3), 7.d(4), and enclosure (2). CNICINST 5100.3, enclosure (3) further describes Receiver responsibilities for managing their core safety program.

The following steps will be taken by CNIC HQ N35 to track and monitor the status of compliance with tenant notification and needs assessment documentation requirements:

- At the end of each quarter of the FY (every 3 months), CNIC HQ N35 will conduct a data pull from ESAMS using a standardized data query developed by ESAMS System Manager with the following metrics:

Percentage of required inspections (based on needs assessments) that have been scheduled	Total number of required inspections (based on needs assessments)
------------------------------------------------------------------------------------------	-------------------------------------------------------------------

Percentage of scheduled inspections completed and closed	Total Number of Inspections scheduled, completed, and closed
----------------------------------------------------------	--------------------------------------------------------------

- RPDs for Safety will also be provided with respective standardized queries to enable self-monitoring and data validation for their geographic areas of responsibility 60 days in advance of quarterly data pulls by CNIC HQ N35.
- Findings of HQ quarterly data pulls will be posted by the end of the following month on CNIC N3 G2 team space for compliance monitoring and follow-up by senior management.

Recommendation 5: Standardize the method for reporting workplace inspections and recording the data in ESAMS (i.e., by activity, parent unit identification code or building) to facilitate use of the data, capture workload accurately, and provide clear audit trails.

Management Response: Concur. Region/Installation Safety Departments use ESAMS to document workload performed (i.e., inspections and training) and backlog of workload required. Requirements and responsibilities for documenting workplace

inspections are found in CNICINST 5100.3, sections 4.d, 7.a(2), and 7.d(3).

The following steps will be taken by CNIC HQ N35 to help ensure standardization and documentation of workplace inspections:

- By the end of third quarter FY 12, CNIC HQ N35 will publish standardized methodology for recording inspections to include a requirement that documented inspections include the command name, physical location and unit identification code of activity inspected, so that inspection workload requirements (per needs assessment validation) and inspection performance can be uniformly collected, tracked and monitored via ESAMS.
- At the end of each quarter of the FY (every 3 months), CNIC HQ N35 will conduct a data pull from ESAMS using a standardized data query developed by ESAMS System Manager to evaluate implementation and standardized documentation and monitoring of inspections.
- RPDs for Safety will also be provided with respective standardized queries to enable self-monitoring and data validation for their geographic areas of responsibility 60 days in advance of quarterly data pulls by CNIC HQ N35.
- Findings of HQ quarterly data pulls will be posted by the end of the following month on CNIC N3 G2 team space for compliance monitoring and follow-up by senior management.
- CNIC HQ N35 will also communicate compliance outcomes and process improvements with standardized inspection documentation methodology to RPDs of Safety by a variety of means (i.e., monthly RPD phone conversations, frequently asked questions and answers posted to CNIC N3 G2 team space, and annual Defense Connect Online and video teleconferencing training workshops) to help ensure uniform implementation.

Appendix 2:

Management Response from Commander, Naval Safety Center/Chief of Naval Operations Special Assistant for Safety Matters



DEPARTMENT OF THE NAVY
NAVAL SAFETY CENTER
375 A STREET
NORFOLK, VA 23511-4399

7510
Ser 02/0074
6 Feb 12

From: Commander, Naval Safety Center/Chief of Naval Operations
Special Assistant for Safety Matters (OPNAV N09F)
To: Naval Audit Service (NAVAUDSVC), 1006 Beatty Place SE,
Washington Navy Yard DC 20374-5005
Subj: NAVY SAFETY AND OCCUPATIONAL HEALTH WORKPLACE INSPECTIONS
(DRAFT AUDIT REPORT N2011-NIA000-0044)
Ref: (a) NAVAUDSVC memo 7510/N2011-NIA000-0044, of 6 Jan 12

1. In accordance with reference (a), the following response is provided regarding planned actions by Commander, Naval Safety Center/Chief of Naval Operations Special Assistant for Safety Matters (COMNAVSAFECEN/OPNAV N09F) for Finding #1, Recommendation #4 and Finding #2, Recommendation #6 of the draft audit report.

2. Finding 1, Recommendation 4, "Coordinate with the Deputy Assistant Secretary of the Navy, Safety to determine the degree of management oversight and reporting needed to ensure effective and efficient management of workplace inspection results; and revise Office of the Chief of Naval Operations Instruction 5100.23G accordingly."

COMNAVSAFECEN/OPNAV N09F concurs with the recommendation. Department of the Navy policy for safety, mishap prevention, occupational health and fire protection programs (SECNAVINST 5100.10J) currently requires DON activities to implement the instructions regarding organization, inspection and abatement procedures, standards, and safety and health councils, published in DOD Instruction 6055.1, DoD Safety and Occupational Health (SOH) Program. Chapter 9 of OPNAVINST 5100.23G reiterates this requirement, however, the applicable passages need to be strengthened to reflect the degree of management oversight and reporting required to ensure effective and efficient management of workplace inspection results. COMNAVSAFECEN/OPNAV N09F will incorporate the improved wording to Chapter 9 in the next revision of OPNAVINST 5100.23 planned for release no later than 1 April 2013. COMNAVSAFECEN/OPNAV N09F requests a due date of 1 April 2013 to complete this action and will provide six month status reports on progress beginning on 1 Jul 2012.

Subj: NAVY SAFETY AND OCCUPATIONAL HEALTH WORKPLACE INSPECTIONS
(DRAFT AUDIT REPORT N2011-NIA000-0044)

3. Finding 2, Recommendation 6, "Direct Navy commands and activities to use one standardized system and methodology to record inspections and deficiencies."

COMNAVSAFECEN/OPNAV N09F concurs with the recommendation. The Secretary of the Navy has directed development of a Risk Management Information System (RMIS) that will facilitate unit-level Safety Program management and provide aggregate reporting, analysis, and tracking of all hazards and reportable mishaps. As envisioned, the RMIS will include the ability to capture workplace inspection results and track abatement action. COMNAVSAFECEN/OPNAV N09F requests a due date of 1 Oct 2014 to complete this action and will provide six month status reports on progress beginning on 1 Jul 2012.

4. COMNAVSAFECEN/OPNAV N09F offers one general comment about this audit. The title of the audit implies a broader scope than the actual narrow focus which looked only at those activities serviced by CNIC regions. The methodology used to identify the activities studied in the second phase of the audit contributed to a conclusion that we believe overstates the problem. The audit report states that 44% of the activities reviewed did not have workplace inspections conducted. While that may be true for the activities audited, our experience indicates the percentage of Navy workplace inspections completed would increase dramatically if other commands (e.g.; shipyards, NAVAIR fleet readiness centers, NAVFAC facility engineering centers, hospitals, etc.) were included.

5. NAVSAFECEN/OPNAV N09F Point of Contact is NAVSAFECEN Executive Director, COMM: [REDACTED]
[REDACTED] or Email: [REDACTED]

FOIA (b)(6)

[REDACTED]
Deputy Commander

FOIA (b)(6)

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