# Occupational Safety and Health System Management                    SPP# A-2

## Quick Reference

## 1.0 Purpose

The purpose of this safety policy and procedure is to actively manage and integrate occupational safety and health into the business in order to continuously reduce accidents, injuries, and illnesses and ensure ongoing compliance with occupational safety and health regulations.

## 2.0 Scope and Applicability

This safety policy and procedure provides guidelines to effectively manage Occupational Safety and Health (OSH) at NCDOT. This policy and procedure affects all NCDOT Division of Highways employees.

## 3.0 Reference

The following documents establish the framework for Division of Highways OSH systems:
- ➢ Secretary's Safety Message
- ➢ NCDOT Workplace Safety Manual (WSM)
- ➢ NCDOT Safety Policy & Procedure Manual (SPP)

As a minimum, Division/Unit OSH Systems shall be developed and maintained based upon these documents.

## 4.0 Policy

The Division of Highways Staff shall manage OSH as an integral part of the business to include an OSH System that delivers division-wide strategy, performance objectives, and process actions leading to continuous improvement in accident, injury, and illness prevention and maintenance of regulatory compliance. The system shall be measured for ongoing compliance and improvement.

## 5.0 General Responsibilities

It is the responsibility of each division/unit head, manager, and supervisor to ensure implementation of NCDOT's OSH System. Specific responsibilities are found in Section 6.3.

## 6.0 Procedure

This section provides applicable definitions, establishes objectives, and identifies specific responsibilities and documentation required to effectively manage NCDOT's OSH System.

### 6.1. Definitions

**Hazard**
Anything with the potential to harm people, property, or the environment. May be discovered in materials, equipment, locations, processes, or work methods.

**Occupational Safety and Health (OSH)**
Generic term for safety and health programs and systems for all operations.

**OSH System**
A structured approach to OSH management, which consists of processes.

**Process**
A documented series of actions or operations directed toward a particular result.

**Risk**
Likelihood and consequence of a hazard happening.

| 6.2. | OSH System Management General Provisions |
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This section details the provisions of this safety policy with each provision discussed in a separate subsection. These provisions are:
- OSH Management Commitment
- OSH Objectives
- OSH Resources
- DOT Safety Policies & Procedures
- Training
- Hazard Assessment

| 6.2.1. | OSH System Management Commitment |
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For an effective OSH System, Management Commitment must be clearly present and demonstrated to the entire work force. The following actions illustrate forms of Management Commitment that should be used:

➤ Communicate Division/Unit Management commitment for OSH to the entire workforce through action by participating in facility or work site walk-through audits. Division Engineers/Unit Heads with Field Operations and their direct reports should participate in at least twelve audits per year. Units without Field Operations should participate in the number of audits outlined in the Workplace Safety Manual.

➤ Communicate in writing Division/Unit Head OSH commitment to the entire workforce at least annually. The Division Engineer or Unit Head should issue this communication.

➤ OSH is a scheduled agenda item at routine Division Engineer/Unit Head staff meetings.

➤ Incentives, if used, should stress reward of positive performance or effort and are not to be a disincentive for reporting injuries, illnesses, or accidents. Examples include recognition for best safety audits or safety suggestions.

### 6.2.2. OSH Objectives

For an effective OSH System, clear objectives must be established, implemented, and monitored by the Division or Unit. The following objectives are essential for the continual improvement of OSH in accident, injury, and illness prevention and maintenance of regulatory compliance:

- ➢ Integrate OSH into business plans as a set of specific performance objectives.
- ➢ Monitor progress of specific performance objectives to ensure timely execution.
- ➢ Measure and monitor injury trends (total injuries, lost workday cases, most prevalent types of injuries) at least quarterly.
- ➢ Measure and monitor accident trends (total accidents, most prevalent types of accidents) at least quarterly.
- ➢ Establish a master plan for ongoing OSH training activities.
- ➢ Closure for action items identified in facility or work site audits.
- ➢ Conduct annual OSH system management assessment outlined in Appendices A, B, & C of this SPP.
  - ❑ Appendix A: OSH System Management Assessment Process
  - ❑ Appendix B: OSH System Management Assessment Audit Form
  - ❑ Appendix C: Guide for OSH System Management Assessment Auditor
- ➢ Specific performance objectives are a well-defined component of the annual performance management process for individuals within the Division or Unit.
- ➢ Injury trends and OSH assessments show improvement each year, or if they have attained a high level of performance, they are sustained at that level.

### 6.2.3. OSH Resources

Appropriate resources in the form of budget, personnel, and allocated time must be available for an effective OSH System. The following elements should be in place to ensure adequate OSH resources are available for the OSH System:
- ➢ Allocate resources for plans, especially OSHA compliance and injury, illness, and accident prevention.
- ➢ OSH responsibilities are clearly defined for all levels of the organization.
- ➢ For Divisions, an adequate safety staff is maintained which reports to the highest applicable management position for the Division. Safety & Loss Control safety staff shall provide support to Units.
- ➢ Adequate resources are budgeted for the safety staff to accomplish objectives by maintaining professional competency.

### 6.2.4.  NCDOT Safety Policies and Procedures

The NCDOT Workplace Safety Manual and NCDOT Safety Policy and Procedure Manual provide the framework for NCDOT's OSH System.  The Workplace Safety Manual details the NCDOT Safety Program and also includes Safe Operating Procedures for employees to perform their jobs safely.  The Safety Policy and Procedure Manual contains Administrative and Regulatory Compliance procedures for NCDOT.  For Safety Policies and Procedures to be effective, the following elements are necessary:

- ➢ NCDOT Workplace Safety Manual and Safety Policy & Procedure Manual are accessible to all employees.
- ➢ Hard copy versions are the latest revision.
- ➢ All new or modified NCDOT Safety Policies & Procedures are reviewed and approved by appropriate staff level.

### 6.2.5.  Training

All management / supervision is trained to effectively manage OSH. Safety & Loss Control shall develop and assist in providing the appropriate training.

### 6.2.6.  Hazard Assessment

The primary purpose of hazard assessment in OSH is to identify hazards prior to the occurrence of an incident.  Facility and work site audits provide the mechanism for NCDOT to accomplish this task.  To effectively manage the OSH System, the following processes should also be incorporated:

- ➢ A thorough formal OSH review is conducted of all Division/Unit facility capital improvement / renovation projects prior to the start of the project.
- ➢ Hazards are identified and risks are appropriately managed.

### 6.2.7.  Documentation Requirements

The following documentation is required in order to adequately assess OSH System Management:

- ➢ Written OSH System plan.
- ➢ Division or Unit Head statement of Occupational Safety and Health Management Commitment.

### 6.3. Specific Responsibilities

#### 6.3.1. Safety and Loss Control

**Safety and Loss Control** will develop policy and procedure that serves as the foundation of the NCDOT OSH System.  Safety and Loss Control will also assist in developing and securing the required training for management/supervision related to implementation of OSH System Management in accordance with this SPP.

#### 6.3.2. Safety Engineers/Safety Officers

**Safety Engineers (SE)/Safety Officers (SO)** will monitor and assist in the compliance components of the OSH system.

#### 6.3.3. Division/Unit Heads

Division/Unit Heads will manage their respective division or unit OSH system.

# APPENDIX A: OSH System Management Assessment Process

## 1. Purpose

The purpose of this assessment process is to carefully examine the Management of Occupational Safety and Health Systems at NCDOT for the continuous improvement in accident, injury, and illness prevention and maintenance of regulatory compliance.  In so doing, the personnel at the Division or Unit being assessed and the personnel conducting the assessment gain insights to focus on parts of the OSH system that most need their attention and direction.

## 2. Format

The assessment process shall be conducted annually by the Division Unit as a self-assessment tool to establish a baseline for continual improvement of their respective OSH System.  The OSH System Management Assessment Audit Form (Appendix B) shall be used to conduct the assessment, and the tabulated score has a maximum of 100 points.  The elements for the audit are based on the OSH components found under General Provisions listed in the OSH System Management Policy and Procedure SPP# A-2.

- OSH Management Commitment
- OSH Objectives
- OSH Resources
- DOT Safety Policies & Procedures

Partial credit will be received for having portions of each element listed for the OSH Provision being assessed.  Appendix C presents "Guide for OSH System Management Assessment Auditors" that should be used as an aid in this assessment process.

## 3. Scoring

For each assessment element on the audit form, the range of points obtainable is stated.  Upon review of documented evidence, select the statement that correlates with the current status for that particular element to determine the score and enter it on the audit form.  Upon completion of all assessment questions, tabulate the totals for each OSH Provision and enter the total scores for each Provision.  The Total Management Assessment Score is the sum total for all Provisions with 100 points being the maximum achievable score.  This score establishes the baseline for continual improvement of the OSH System by identifying system deficiencies.  This useful management assessment tool assists the Division/Unit in establishing specific performance objectives for their OSH System.  Subsequent annual OSH assessments should be used to indicate improvement or deficiencies in the OSH System.

# APPENDIX B: OSH System Management Assessment Audit Form

| OSH Management Commitment (6.2.1) | |
|---|---|
| **1. Is the Division/Unit Management Commitment to safety communicated to the entire work force through action by conducting a minimum of (12) facility or work site audits per year? (Scoring of 0-12 points received is based on total number of documented audits for the past 12-month period).** | |
| (12) Division Engineer/Unit Head with Field Operations and their direct reports have conducted (12) or more audits each. <br> (10) Division Engineer/Unit Head with Field Operations and their direct reports have conducted at least (10) audits each. <br> (8) Division Engineer/Unit Head with Field Operations and their direct reports have conducted at least (8) audits each. <br> (6) Division Engineer/Unit Head with Field Operations and their direct reports have conducted at least (6) audits each. <br> (4) Division Engineer/Unit Head with Field Operations and their direct reports have conducted at least (4) audits each. <br> (2) Division Engineer/Unit Head with Field Operations and their direct reports have conducted at least (2) audits each. <br> (0) Division Engineer/Unit Head with Field Operations and their direct reports have conducted less than (2) audits each. | Score /**12** |
| **2. Is the Division Engineer/Unit Head OSH commitment communicated to the entire work force at least annually? Cumulative Scoring (0 to 11 points) received is based on the methods of communication, which can be verified through documented evidence in the form safety meetings, letter or e-mail from Division Engineer/Unit Head, and postings for the past 12-month period.** | |
| (6) OSH commitment has been communicated by the Division Engineer/Unit Head to the entire work force in the past 12-month period verbally through safety meetings. <br> (3) OSH commitment has been communicated by the Division Engineer/Unit Head to the entire work force in the past 12-month period by letter or e-mail. <br> (2) OSH commitment has been communicated by the Division Engineer/Unit Head to the entire work force in the past 12-month period through posting letter of e-mail from Division/Unit head. <br> (0) OSH commitment has not been communicated by the Division Engineer/Unit Head. <br> **Obtain Cumulative Scoring Total by Summing Points for Each Method of Communication Verified.** | Cumulative Score /**11** |

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|---|---|
| **3. Is OSH a scheduled agenda item at routine Division/Unit Head staff meetings?  Scoring (0 to 8 points) received based on the percentage of Division/Unit head staff meeting minutes or agendas documenting OSH as a scheduled item.  Review staff meeting minutes or agendas for the past 12-month period.** | |
| (8) OSH is a scheduled item on all Division/Unit Head staff meetings. <br> (6) OSH is a scheduled item on at least 75% of Division/Unit Head staff meetings. <br> (4) OSH is a scheduled item on at least 50% Division/Unit Head staff meetings. <br> (2) OSH is a scheduled item on at least 25% Division/Unit Head staff meetings. <br> (0) OSH is a scheduled item on less than 25% Division/Unit staff meetings. | Score      /**8** |
| **4.  Are incentives used for safety that stress positive performance and not disincentives for reporting injuries?  Scoring (0 to 4 points) received for documented evidence of incentives program in place for the past 12-month period.** | |
| (4) Safety incentives are being used that stress positive performance. <br> (2) Safety incentives are being used, but do not stress positive performance. <br> (0) Safety incentives are not being used. | Score      /**4** |

| OSH Objectives (6.2.2) | | |
|---|---|---|
| **1. Scoring (3 points) received for each of the following elements based on documented evidence verifying the element is currently incorporated in your OSH System.** | | |
| 1. OSH is integrated in business plans as a set of specific performance objectives.<br>2. Progress of specific performance objectives is monitored to ensure timely execution.<br>3. Injury trends (total injuries, lost workday cases, most prevalent types of injuries) are measured and reported to the Division/Unit at least quarterly.<br>4. Accident trends (total accidents, most prevalent type of accident) are measured and reported to the Division/Unit at least quarterly.<br>5. Master plan for training activities.<br>6. Closure or plan in place for of all action items identified in facility or work site audits.<br>7. OSH System Management Assessment measured and reported to the Division/Unit annually.<br>8. Measured results are a well-defined component for the annual performance appraisal process for Division/Unit performance. | Score | **/24** |
| **2. Do injury trends and OSH Assessments show improvement from the previous year, or if they have sustained a high level of performance by meeting the DOH goal, they are sustained at that level. Scoring (0 to 16 points) received for OSH performance measures.** | | |
| (16) Both of these OSH performance measures show improvement or meet DOH goal.<br>(8) Only one of these OSH performance measures shows improvement or meets DOH goal.<br>(0) Neither of these OSH performance measures shows improvement or meets DOH goal. | Score | **/16** |
| OSH Resources (6.2.3) | | |
| **Scoring (4 points) received for each of the following elements based on documented evidence verifying the element is currently incorporated in your OSH System.** | | |
| 1. Resources have been allocated for OSH plans to ensure OSHA compliance and injury, illness, and accident reduction.<br>2. OSH responsibilities are clearly defined for all levels of the Division/Unit.<br>3. An adequate safety staff is being maintained which reports to the highest management position for the Division/Unit.<br>4. Adequate resources are budgeted for the safety staff to accomplish objectives by maintaining professional competency. | Score | **/16** |

| NCDOT Safety Policies and Procedures (6.2.4) | | |
|---|---|---|
| **Scoring (3 points) received for each of the following elements based on documented evidence verifying the element is currently incorporated in your OSH System.** | | |
| 1. NCDOT Workplace Safety Manual and Safety Policy & Procedure Manual are accessible to all employees.<br>2. Hard copy NCDOT Workplace Safety Manual and Safety Policy & Procedure Manual are the latest revision.<br>3. All new or modified NCDOT Safety Policy & Procedures are reviewed with comments provided to Safety and Loss Control as requested. | Score | **/9** |
| **SCORING SUMMARY** | | |
| **OSH Management Commitment (6.2.1)** | Score | **/35** |
| **OSH Objectives (6.2.2)** | Score | **/40** |
| **OSH Resources (6.2.3)** | Score | **/16** |
| **NCDOT Safety Policies and Procedures (6.2.4)** | Score | **/9** |
| **TOTAL MANAGEMENT ASSESSMENT SCORE** | Score | **/100** |

# APPENDIX C: Guide for OSH System Management Assessment Auditors

Appendix B contains the OSH System Management Assessment Audit Form.  The following information should be used as a guide for evaluating each element on the Audit Form.

## OSH Management Commitment (6.2.1)

1. **Is the Division/Unit Head commitment to safety communicated to the entire work force through action by conducting a minimum of (12) facility or work site audits per year?**

    The action of conducting facility or work site walk-through audits by the Division Engineer or Unit Head is a clearly visible means of demonstrating OSH Management Commitment to the entire work force.  Points are assessed based on the number of documented audits conducted by the Division Engineer/Unit Head for the past 12-month period.

2. **Is the Division/Unit Head OSH commitment communicated to the entire work force at least annually?**

    Communication of OSH commitment by the Division/Unit Head to the entire work force is another visible means of demonstrating Management Commitment to the entire work force.  Cumulative points (11 total points maximum) are assessed based on the methods used to disseminate this communication to the work force.  Each method of communication is listed below along with respective points received upon verification of documented evidence.

    - (6) Points for verbal communication based upon documented evidence such as copy of safety meeting agenda or minutes that show subject matter was covered. A random sampling of (5) separate locations within the Division or Unit should be used for this determination.  Points will be received if documented evidence is available for (4) of those (5) locations.  For Divisions or Units that entail several counties, locations should be chosen from different counties to provide a better indication of the extent this communication has be disseminated.
    - (3) Points for documented evidence in the form of letter or e-mail for this method of communication from the Division/Unit Head.
    - (2) Points for documented evidence of posting OSH commitment from Division/Unit Head may be determined observing such posting on Division/Unit office bulletin boards. A random sampling of (5) separate locations within the Division or Unit should be used for this determination. Points will be received if documented evidence is available for (4) of those (5) locations. For Divisions or Units that entail several counties, locations should be chosen from different counties to provide a better indication of the extent posting OSH commitment is being utilized. The same locations used to confirm verbal communication may also be used for this determination.

3.  **Is OSH a scheduled agenda item at routine Division/Unit Head staff meetings?**
    OSH Management Commitment is clearly evident when OSH is a scheduled agenda item at routine Division/Unit Head staff meetings.  Points are assessed based on the percentage of Division/Unit Head staff meetings where OSH was a scheduled agenda item. A review of Division/Unit Head staff meeting agendas or minutes for the past 12-month period should be used as the documented evidence to determine the percentage.

4.  **Are incentives used for safety that stress positive performance and not disincentives for reporting injuries?**
    Safety incentives should stress positive performance if used. Recognition for outstanding audits or safety suggestions are good examples.  Whereas, safety incentives for achieving lower incident rates may be a disincentive for reporting incidents.

## OSH Objectives (6.2.2)

1.  **In order for Management of OSH System to be effective, clear objectives must be established and implemented by the Division/Unit based on issues that offer the greatest opportunity for improvement.  Points are assessed based on documented evidence for each of the following Objectives listed in the OSH System Management Policy and Procedure SPP# A-2 present.**

    - **OSH is integrated in business plans as a set of specific performance objectives.**
        NCDOT is in the business of building and maintaining the state's transportation system, but it is essential to remember the importance of a safe and healthy work environment.  Integrating OSH in business plans as a set of specific performance objectives ensures safety and health is a primary consideration in all operations.  A review of Division/Unit head staff meeting minutes for the past 12-month period will determine if OSH is part of the business plan with specific performance objectives.

    - **Progress of specific performance objectives is monitored to ensure timely execution.**
        To ensure specific OSH performance objectives are met, progress must be monitored to ensure timely execution by establishing target dates for those objectives.  A review of Division/Unit head staff or safety committee meeting minutes for the past 12-month period will determine if progress of specific performance objectives has been monitored.

- **Injury trends (total injuries, lost workday cases, most prevalent types of injuries) are measured and reported to the Division/Unit at least quarterly.**
  Injury trends provide valuable insight to achieve ongoing improvement in overall OSH performance. In order to reduce and prevent injury to the NCDOT workforce, trending is a useful tool to determine focus areas. A review of Division/Unit head staff or safety committee meeting minutes for the past 12-month period will determine if Injury Trends have been reviewed at least quarterly in meeting this objective.

- **Accident trends (total accidents, most prevalent type of accident) are measured and reported to the Division/Unit at least quarterly.**
  Accident trends also provide valuable insight to achieve ongoing improvement in overall OSH performance. In order to reduce and prevent accidents to NCDOT equipment, trending is a useful tool to determine focus areas. A review of Division/Unit head staff or safety committee meeting minutes for the past 12-month period will determine if Accident Trends have been reviewed at least quarterly in meeting this objective.

- **Master plan for training activities.**
  Training is a vital component of OSH and having a master plan for training activities is key to ensuring applicable training is administered to the appropriate personnel. Documented evidence of a training plan or schedule for the current year will meet this objective.

- **Closure or plan in place for all action items identified in facility or work site audits.**
  Facility and work site auditing is an important key to improved safety performance. Auditing identifies hazards before an incident takes place. Closure or having a plan in place for all action items resulting from audits is essential for injury and accident prevention. Facility and/or work site audits conducted by the Division/Unit Head should be reviewed for the past 12-month period to determine if closure or plan is in place for all action items identified in the facility or work site audits.

- **OSH System Management Assessment measured and reported to the Division/Unit annually.**

  The OSH System Management Assessment is a tool for the continuous improvement of accident, injury, and illness prevention and maintenance of regulatory compliance. It should be used to identify and prioritize OSH issues based on factors such as the level of risk, potential for system improvement, standards, regulations, feasibility, and potential business consequences. A review of Division/Unit Head staff or safety committee meeting minutes for the past 12-month period will determine if OSH System Management Assessment has been measured and reported to the Division/Unit.

- **Measured results are a well-defined component for the annual performance appraisal process for Division/Unit performance.**

  Safety should be listed as one of the Key Responsibilities with measurable expectations for Division/Unit Management Staff on their Performance Management Work Plan to ensure OSH is a priority. Utilize the organization chart for the Division/Unit to determine the Management Staff (direct reports to the Division/Unit Head) for whose Performance Management Work Plan should be reviewed. Points will be received if at least 75% of the work plans reviewed list OSH as a measurable component.

2. **Do injury trends and OSH Assessments show improvement from the previous year or if they have sustained a high level of performance by meeting the DOH goal, they are sustained at that level?**

   Effective implementation and management of OSH should lead to improvement in injury trends and OSH Assessments. These OSH performance indicators allow for continuous improvement or sustaining a high level of performance by meeting or exceeding the DOH goal.

## OSH Resources (6.2.3)

**In order for Management of OSH System to be effective, appropriate financial, human and organizational resources must be available to the Division/Unit. Points are assessed for documented evidence that the following elements listed in the OSH System Management Policy and Procedure SPP# A-2 are being utilized.**

1. **Resources have been allocated for OSH plans to ensure OSHA compliance and injury, illness, and accident reduction.**
   Based on results of recent OSHA inspections and NCDOT statewide compliance issues, available resources should be allocated to address the issues identified by Division/Unit head staff. Review of Division/Unit head staff or safety committee meeting minutes for the past 12-mont period to determine if resources have been allocated to address issues identified.

2. **OSH responsibilities are clearly defined for all levels of the Division/Unit.**
   Supervisors are responsible and should be held accountable for the safety of their employees, and each employee is expected to perform their duties in a safe and responsible manner. At the Division level and some Units, specific OSH responsibilities should be clearly defined for Safety Engineers, Safety Officers, or Safety Coordinators to maintain an effective OSH. Documented evidence may be in the form of job descriptions for those positions.

3. **An adequate safety staff is being maintained which reports to the highest management position for the Division/Unit.**
   Safety Engineers, Safety Officers, or Safety Coordinators typically comprise the safety staff roles for the Division/Unit. These resources play an important part in the effective implementation of OSH for continual improvement and integration into Division/Unit operations and should report to top management. Verification that the safety staff positions are currently filled and reporting to top management based on current organizational chart for the Division/Unit shall be used to determine if this OSH resource element is present.

4. **Adequate resources are budgeted for the safety staff to accomplish objectives by maintaining their professional competency.**
   Safety Engineers, Safety Officers, and Safety Coordinators must receive the appropriate training to maintain professional competency in order to accomplish objectives identified by the Division/Unit OSH System. Documented evidence that the safety staff has received training (safety seminars, workshops, courses, etc,) within the past 12-month period shall be used to determine if this OSH resource element is present.

## NCDOT Safety Policies and Procedures (6.2.4)

**NCDOT Safety Policies and Procedures in the form of the Workplace Safety Manual and Safety Policy and Procedure Manual provide the framework for NCDOT Occupational Safety and Health program. Points are assessed for documented evidence that the following elements listed in the OSH System Management Policy and Procedure SPP# A-2 are being utilized.**

1. **NCDOT Workplace Safety Manual and Safety Policy & Procedures are accessible to all employees.**
   The Workplace Safety Manual and Safety Policy & Procedures are electronically accessible to all employees with computer access. Hard copies should be readily available in cases where a computer is not readily available. Interviewing a random sampling of (5) employees at separate locations within the Division or Unit should be used to determine accessibility. Points will be received if interviewees for those (5) locations can verify they have accessibility by showing where they have access. For Divisions or Units that entail several counties, locations should be chosen from different counties to provide a better indication of the extent NCDOT Workplace Safety Manual and Safety Policy & Procedures are accessible to all employees.

2. **Hard copy NCDOT Workplace Safety Manual and Safety Policy & Procedures are the latest revision.**
   The latest revision of both the Workplace Safety Manual and Safety Policy & Procedures is the electronic version available on the NCDOT Division of Highways Safety web site at <http://www.doh.dot.state.nc.us/safety>. A random sampling of (3) Workplace Safety Manuals and Safety Policy & Procedure Manuals at separate locations within the Division or Unit should be used to determine if they are the latest revision. Points will be received if the revision date for those (3) locations is same as the electronic version on the NCDOT Division of Highways web site. The same locations used to confirm accessibility to employees above may also be used for this determination.

3. **All new or modified NCDOT Safety Policy & Procedures are reviewed with comments provided to the OSH staff as requested.**
   To ensure proper communication throughout the Division/Unit, all new or modified NCDOT Safety Policy & Procedures should be reviewed with comments provided to the OSH staff providing feedback on any issues or concerns. Verification that the Division/Unit has Policy and Procedures Review mechanism in place to meet this requirement may be in the form of a Subcommittee or Division/Unit head staff meeting agenda item as the need arises for new or modified NCDOT Safety Policy & Procedures.