

4. SUMMARY OF BROAD-SCALE REVIEW FINDINGS

4.1 Current Safety Culture

The nature and extent of safety needs within WS has increased dramatically over the last 100 years. Traditional activities such as the use of trapping and shooting are still a large part of the WS program, but the variety of activities WS is involved in has mushroomed to include disease surveillance, bird and mammal management at airports, dams, buildings, highways, parks and in a variety of agricultural settings, as well as small predator management for protection of threatened and endangered species, and other conservation activities. Reviewers found that the WS Program addresses diverse wildlife damage issues involving complex safety challenges. Much of the work accomplished by WS is inherently dangerous, and as WS continues to grow to meet new and more complex demands, a sound, aggressive safety program will be paramount to the program's success.

Reviewers stated that WS is doing a commendable job of fostering a philosophy and culture that embodies a strong safety ethic. In most state programs, and at the national level, reviewers reported finding committed professionals who placed high importance on personnel safety. This positive attitude was supported by State Directors who either addressed safety issues themselves or assigned safety-conscious employees to monitor and improve employee safety. With support from the APHIS Safety, Health and Employee Wellness Branch, and National APHIS Safety and Health Council, WS developed a safety system around the APHIS model which is based on Occupational Safety and Health Administration (OSHA) standards. The WS safety program is comprised of a national WS Safety and Health Council, safety officers at various program levels, and safety committees and protocols that have resulted in an environment that has produced surprisingly few accidents relative to the nature and extent of WS activities. Wildlife Services has also developed excellent working relationships with agencies and organizations that regulate or have a vested interest in workplace safety. In reference to the explosives program, the reviewer stated that *“Wildlife Services has an outstanding explosives and pyrotechnics safety and security program and fosters a culture, from top to bottom, that promotes safety. The WS explosives and pyrotechnics safety and security program could serve as a model for other agencies or groups looking to improve their own program.”* All reviewers commented favorably on the effort and success WS has had overall with its safety programs, stating that employees and management truly sought to operate in the safest way feasible.

Reviewers also encountered the occasional situation where this level of enthusiasm and competence was lacking. Some reviewers found the culture and attitudes towards safety within some WS state programs to be essentially “all or nothing.” In those states, it was noted that while all WS personnel attempted to operate safely, the general working culture and lack of information/training/discussion did not support proper safety protocols. Thus, while the desire to accomplish the WS mission as safely as possible was prevalent among the WS personnel encountered,

management must emphasize its importance and provide adequate financial and personnel resources to accomplish a universal safety culture within WS.

Some of the general recommendations made by reviewers to improve the safety attitudes and culture within WS include the following:

- Wildlife Services should make better use of the existing awards programs and develop new and creative ways to acknowledge exemplary safety behavior.
- Wildlife Services should establish and facilitate an information-sharing process.
- The WS Safety and Health Council and all committees should become more proactive on safety issues.
- Display safety posters and other visual safety information to reinforce safety on bulletin boards, safes and in vehicles both in the state and field offices.
- Managers should ensure the highest quality of training that is available to all appropriate employees. Initiate and encourage mentorship programs.
- Managers should create opportunities for isolated employees to work with others, either within the state or in an exchange program with other states.

As previously stated, overall the reviewers invited to evaluate WS safety programs and culture were impressed with the types of work WS conducts in relation to the number of accidents the program experiences. The fact that in many areas accident rates are lower than could be expected considering the nature and amount of work conducted, is testament to an already strong safety culture within the Program.

4.2 Safety Program Administration

Reviewers commented that some WS Directives are vague and do not provide adequate guidance for state programs. Directives should clearly set the baseline standards for WS activities. Two components of WS operations evaluated in this review, watercraft and zoonotic disease, are not currently addressed by a specific directive. Wildlife Services should develop directives for these activities. Safety Directive 2.601 requires WS to meet state standards for watercraft operation, but because WS sometimes operates watercraft in more hazardous environments than recreational boaters, it should establish a directive that requires higher training and safety standards than those required for recreational boaters. Wildlife Services should put a directive in place that specifies minimum safety standards for protection against accidental transmission of zoonotic diseases and parasites that is applicable to all WS field personnel. Well-crafted directives in both of these program areas, watercraft and zoonotic disease, would provide the basis for developing strong safety programs.

Because the risk of contacting zoonotic diseases and parasites during daily activities is a real facet of WS field activities, WS should make sure APHIS, the Department of Labor, and the Office of Worker's Compensation Program (OWCP) recognize disease and parasites as an occupational hazard. As a recognized occupational hazard, efforts should be made to make it easier for personnel to document exposure and submit OWCP/medical claims. Wildlife Services should also explore

the possibility of providing both pre- and post-exposure and annual blood testing for all employees covering all potential diseases.

The WS safety program is currently administered by the National WS Safety and Health Council, special emphasis committees, and the appointment of state office Safety Coordinators, and regional Collateral Duty Safety and Health Officers (CDSHO). This structure appears to function very well for some states and in some areas of program safety. Another management approach is to have a centralized and staffed safety program. Review final reports were evaluated for recommendations regarding the need for changes in the administration of the safety program and the need for additional safety staff within WS. Five of the nine reviewers made specific comments on these topics.

- Vehicles – “During interviews it was learned that Regional safety persons served on a collateral duty basis. Given the number of personnel in the field within the Eastern and Western Regions who have direct, daily exposure to safety hazards, these persons should be assigned on a full-time basis.”
- Explosives and Pyrotechnics – “Ensure that at least ½ FTE (full-time employee) be devoted to the national coordination of the WS explosives and pyrotechnics safety and security program.”
- Watercraft – “Safety officers should be appointed for each district.”
- Hazardous Materials – “Provide junior level support to the Chemical Hygiene Officer” at the NWRC.
- Aviation – “Serious consideration should be given to the addition of another full time Certified Flight Instructor (CFI) to the Cedar City training facility staff. . . An additional CFI would provide more timely checking (evaluating pilots during a flight) and enhance standardization and thus safety.”

A clear consensus was not achieved on whether a program-wide safety officer is recommended. However, this may be a function of each review being limited to one safety area rather than the programmatic perspective. Reviewers were not asked to make comments on the need for a program-wide safety officer. Despite the absence of universal recommendation, most reviewers either explicitly or implicitly supported an increase in dedicated safety personnel. It was also apparent in many reviews that an effective safety program must receive adequate, dedicated funding from management.

4.3 Safety Program Funding

Many reviewers recommended that WS should have a dedicated budget to provide the resources necessary to develop all the components of a strong safety program such as: setting baseline safety standards, training and certifying employees, training instructors, building systems to track training needs and accidents, distributing safety reminders and informational materials, allowing travel for inspections and to conduct training, supporting awards programs, conducting accident investigations and implementing corrective measures when needed.

Wildlife Service projects are often funded through local sources. One reviewer reported encountering a stronger allegiance to the local cooperator than WS. This stronger allegiance and relationship can lead to a culture where “getting the job done” can supersede safety and compromise the State Directors’ ability to guide and direct field employees. Reviewers understood the need for WS state programs and personnel to meet the expectations of cooperators, but they emphasized this type of relationship can not be allowed to dilute the importance of safety and attention to detail. Indeed, WS should continue to create a culture where safety protocols are viewed as part-and-parcel of every successful project.

4.4 Supervisor and Employee Responsibility

Reviewers noted that WS Directives should clearly state that supervisors must take immediate action to evaluate risks of mission activities and minimize any impact they have on safety. It is the supervisor’s responsibility to provide employees with high quality training and appropriate safety equipment to perform WS mission duties. Supervisors should also ensure employees are properly prepared to perform job-related functions (e.g., possessing a current motor vehicle license, Drug Enforcement Administration (DEA) certification, or pesticide applicator certification). Supervisors should conduct annual review visits (field and office) and “ride-alongs” with each field employee. To that end, WS should continue to develop clear, enforceable guidance outlining Program safety standards and clearly communicate them to employees. Wildlife Services should implement a more rigid drug-testing program for hiring employees involved in hazardous activities (e.g., firearms, aviation, explosives etc.) and for employees involved in accidents. Greater disciplinary and corrective action should be taken in regards to negligence and policy violations that lead to accidents. Ultimately, each employee should be held responsible for working safely and should be accountable for violations.

Simple tools can be employed to demonstrate a supervisor’s commitment to safety. Employees working remotely should be provided a check-in/check out procedure or emergency rescue locator devices. Safety posters and other visual safety information to reinforce safety should be displayed in the state and field offices and in vehicles. Supervisors should make better use of the existing awards programs and explore new and creative ways to acknowledge exemplary safety behavior.

4.5 Training

Wildlife Services currently has extensive safety-related training requirements for many of the activities included in this review. Wildlife Services needs to develop a more formal, standardized approach to training, including tracking and defining required training curricula, determining acceptable sources of training, and establishing standards for training frequency and certification. Required standards and the consequences of failing to meet them should be clarified within each area. This level of guidance would require significant oversight and a structured tracking system to implement. One reviewer suggested WS develop a training academy to facilitate developing a formal training program. In addition, WS should establish a

formal information-sharing process. This could be as simple as providing a list of trainers' phone numbers or starting a forum for exchanging ideas.

4.6 Information Management

Better information management is recommended for all nine components. Six of the nine reviewers made recommendations for improving or developing databases or tracking systems for safety-related information. Wildlife Services could benefit from a formalized information tracking system in areas such as employee training and certification, chemical and hazardous materials inventory, dissemination of safety information (i.e., MSDSs), monitoring accidents and minor incidents, and monitoring employee health and safety conditions.