

SAFETY DIRECTIVE AND DOCUMENT CREATION AND REVISION

NIST S 7101.16

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1. PURPOSE

The purpose of this suborder is to define the requirements and associated roles and responsibilities for creating and revising directives and other documents used to establish, implement, or assess the NIST Occupational Health and Safety Management System (OHSMS), the NIST Environmental Management System (EMS), and the documents used as part of Fire and Life Safety (FLS) management at NIST (hereafter collectively referred to as “Safety”).

2. BACKGROUND

Successful management of safety risks at NIST starts with ensuring directives (used to establish policy and/or requirements) and accompanying directives and documents necessary to execute the requirements are thoroughly vetted and approved at various levels within the agency. Further, as gaps, deficiencies, and other opportunities for improvement are identified, these safety directives and documents must be revised appropriately. This suborder will assist the Office of Safety, Health, and Environment (OSHE) in achieving the desired outcomes.

3. APPLICABILITY

- a. The provisions of this suborder apply to directives and accompanying documents used to establish, implement, and assess the NIST OHSMS, EMS, and FLS except as noted in Section 3.b.
- b. The provisions of this suborder do not apply to directives and accompanying documents associated with ionizing radiation safety (please see NIST O 7201.00).

¹ For revision history, see Appendix A.

37 **4. REFERENCES**

38 None.

39

40

41 **5. APPLICABLE NIST DIRECTIVES**

42 a. NIST O 1110.00: [Directives Management System](#)

43

44 b. NIST O 1601.00: [Records Management](#)

45

46 c. NIST O 7101.00: [Occupational Safety and Health Management System](#)

47

48 d. NIST O 7201.00: [Ionizing Radiation Safety - Radioactive Material and Ionizing-Radiation-
49 Producing Machines](#)

50

51 e. NIST S 7101.15: [Document and Records Control](#)

52

53 f. NIST S 7101.26: [Workplace Inspection Program](#)

54

55

56 **6. REQUIREMENTS**

57 a. Creation of Safety Directives Establishing Policy or Requirements

58

59 (1) Directives used to establish policies, requirements, roles, and responsibilities shall
60 include the following:

61

62 (a) Policy;

63

64 (b) Order;

65

66 (c) Suborder; and

67

68 (d) Notice

69

70 (2) These directives shall conform with the requirements of the NIST Directives
71 Management System, specifically NIST O 1110.00 and NIST S 7101.15.

72

73 (3) Creating directives identified in Section 6.a(1) shall necessitate development of three
74 drafts that are suitably vetted.

75

- 76 (a) OSHE Draft – A working draft, written by an OSHE program manager(s) responsible
77 for the subject matter area (hereafter referred to as “OSHE PM”), presented to the
78 Chief Safety Officer (CSO) for consideration.
79
- 80 i. This draft may be developed directly with customers, other OSHE staff
81 members, and other stakeholders.
82
 - 83 ii. This draft may be vetted by stakeholders.
84
 - 85 iii. This draft may be vetted, at the direction of the CSO, by OSHE staff who are
86 not the OSHE PM.
87
 - 88 iv. The CSO shall approve this draft after conferring with the OSHE PM.
89
- 90 (b) Safety Advisory Committee (SAC) Draft – A working draft provided to the SAC by
91 the CSO for review and comment.^{2, 3}
92
- 93 i. The CSO shall provide the following to the SAC Chair with a request to
94 disseminate for review and comment:
95
 - 96 (i) Draft document; and
97
 - 98 (ii) Comment template (please see Appendix B).
99
 - 100 ii. The review and comment period shall be determined by the CSO based upon
101 factors such as complexity of the information, length of the document, needs
102 of the organization for the requirements or guidance, *etc.* Typically, this
103 period is two to three weeks.
104
 - 105 iii. The SAC Chair shall be responsible for distributing the draft to all SAC
106 members.
107
 - 108 iv. SAC members shall distribute the draft for review to OU staff who may be
109 affected by the requirements or roles and responsibilities of the directive to the
110 extent practical and appropriate to ensure adequate review and to provide staff
111 an opportunity to participate in the development of NIST's OHSMS.

² In some cases, the subject matter area may only affect a finite population and the CSO may opt to send this draft directly to the specifically affected SAC stakeholders for review and comment (with notification sent to the SAC Chair).

³ In some cases, the CSO may determine that other stakeholders outside of the SAC would benefit from review of the directive and the CSO shall separately send the draft directly to those identified for review and comment.

112 NOTE: Those reviewing the directive during the SAC Review should
113 focus on a technical assessment of the requirements as well as the
114 associated roles and responsibilities. Questions regarding implementation
115 should be reserved for the deployment stage.

- 116
- 117 v. The SAC Chair shall submit a compiled list of all comments using the
118 comment template to the CSO on or before the due date.
- 119
- 120 vi. The CSO shall provide the OSHE PM with the SAC comments.
- 121
- 122 vii. The OSHE PM shall review the comments and reach out directly to a specific
123 commenter, as necessary, for clarification and/or discussion.
- 124
- 125 viii. The OSHE PM shall provide responses to each comment using the comment
126 template indicating that the comment was either:
- 127
- 128 (i) Accepted and, as necessary, how the draft was edited in “track
129 changes” as a result; or
- 130
- 131 (ii) Not accepted and provide a rationale for why.
- 132
- 133 ix. The CSO shall approve the responses and subsequent changes to the draft
134 document after conferring with the OSHE PM.
- 135
- 136 x. The CSO shall provide the approved, revised document and comment
137 template to the SAC Chair.
- 138
- 139 (i) The CSO may communicate with the individual commenters.
- 140
- 141 (ii) The CSO shall provide a 1-week period in which individual
142 commenters can provide feedback on how their comment was
143 addressed.
- 144

145 NOTE: Should additional changes to the document be required as
146 a result of these discussions, the CSO will inform the SAC.

147

148 (c) Executive Safety Committee (ESC) Draft – A working draft provided to the ESC by
149 the CSO for review and comment.⁴

⁴ In some cases, the subject matter area may only affect a finite population and the CSO may opt to send this draft directly to those ESC stakeholders for review and comment.

- 150 i. The CSO shall provide the following to ESC Members with a request to
151 review and comment:
152
153 (i) Draft document; and
154
155 (ii) Comment template (please see Appendix B).
156
157 ii. The review and comment period shall be determined by the CSO based upon
158 factors such as complexity of the information, length of the document, needs
159 of the organization for the requirements or guidance, *etc.* Typically, this
160 period is two to three weeks.
161
162 iii. ESC Members shall submit comments using the comment template to the
163 CSO on or before the due date.
164
165 NOTE: Given OU representatives provided a technical assessment of the
166 requirements during the SAC Review, ESC comments should be higher-
167 level focusing on overall policy decisions and associated roles and
168 responsibilities.
169
170 iv. The CSO shall provide the OSHE PM with the ESC comments.
171
172 v. The OSHE PM shall provide responses to each comment using the comment
173 template indicating that the comment was either:
174
175 (i) Accepted and, as necessary, how the draft was edited in “track
176 changes” as a result;
177
178 (ii) Not accepted and provide a rationale for why; or
179
180 (iii) Recommended for the CSO to reach out directly to a specific
181 commenter for clarification and/or discussion.
182
183 vi. The CSO shall approve the responses and subsequent changes to the draft
184 document after conferring with the OSHE PM.
185
186 vii. The CSO shall provide the revised document and comment template to ESC
187 members.
188

189 (i) The CSO shall provide a 1-week period in which individual
190 commenters can provide feedback on how their comment was
191 addressed.

192
193 NOTE: Should additional changes to the document be required as
194 a result of these discussions, the CSO will inform the ESC.

195
196 viii. The CSO shall request ESC members respond with one of the following:

- 197 (i) Concur;
198
199 (ii) Concur with comments; or
200
201 (iii) Do not concur with comments.
202

203
204 This response period shall be a minimum of 1 week.

205
206 ix. After the response period, the CSO shall either:

- 207
208 (i) Approve the document as a final directive with appropriate approval
209 date; or
210
211 (ii) Work with non-concurring ESC members to resolve their concerns.
212
213 • If resolving these concerns results in a substantive change(s),
214 the CSO shall resend the document and comment template to
215 ESC members (Section 6.a(3)(c)vii) and request concurrence
216 (Section 6.a(3)(c)viii).

217
218 (4) Prior to publishing the “final” version of the directive in the Documents and Records
219 Center, the Program Manager for NIST S 7101.15 shall perform a quality control check
220 to ensure conformance with the requirements of that suborder.

221
222 b. Creation of Safety Directives and Documents to Assist in Implementing or Assessing
223 Requirements

224
225 (1) Directives and documents used to assist in implementing or assessing requirements shall
226 include, but not be limited to, the following:

- 227
228 (a) Deployment plan;

- 229 (b) Deployment briefing presentation;
230
231 (c) Training materials;
232
233 (d) OU self-assessment checklist;
234
235 (e) Question sets associated with NIST S 7101.26 (when applicable);
236
237 (f) Procedures (as necessary);
238
239 (g) Guidance (as necessary);
240
241 (h) Forms (when applicable); and
242
243 (i) Permits (when applicable).
244
- 245 (2) Creation of all directives and documents listed in Section 6.b(1) shall consist of two
246 drafts that are suitably vetted.
247
- 248 (a) OSHE Draft – A working draft presented to the CSO by the OSHE PM for
249 consideration.
250
- 251 i. This draft may be developed directly with customers, other OSHE staff
252 members, and other stakeholders.
253
- 254 ii. This draft may be vetted by stakeholders.
255
- 256 iii. This draft may be vetted, at the direction of the CSO, by OSHE staff who are
257 not the OSHE PM.
258
- 259 iv. The CSO shall approve this draft after conferring with the OSHE PM.
260
- 261 (b) SAC Draft – A working draft provided to the SAC by the CSO for review and
262 comment.
263
- 264 i. The CSO shall provide the following to the SAC Chair with a request to
265 disseminate for review and comment:
266
- 267 (i) Draft document; and
268

- 269 (ii) Comment template (please see Appendix B).
270
271 ii. The SAC Chair shall be responsible for distributing the draft to all SAC
272 members.
273
274 (i) SAC members shall distribute the draft for review to their OU staff to
275 the extent practical and appropriate to ensure adequate review and to
276 provide staff an opportunity to participate in the development of
277 NIST's OHSMS.
278
279 iii. The review and comment period shall be determined by the CSO based upon
280 factors such as complexity of the information, length of the document(s),
281 number of documents, needs of the organization for the requirements or
282 guidance, *etc.* Typically, this period is 3 weeks.
283
284 iv. The SAC Chair shall submit a compiled list of all comments using the
285 comment template to the CSO on or before the due date.
286
287 v. The CSO shall provide the OSHE PM with the SAC comments.
288
289 vi. The OSHE PM shall review the comments and reach out directly to a specific
290 commenter, as necessary, for clarification.
291
292 vii. The OSHE PM shall provide responses to each comment using the comment
293 template indicating that the comment was either:
294
295 (i) Accepted and, as necessary, how the draft was edited in “track
296 changes” as a result; or
297
298 (ii) Not accepted and provide a rationale for why.
299
300 viii. The CSO shall approve the responses and subsequent changes to the draft tool
301 after conferring with the OSHE PM.
302
303 ix. The CSO shall provide the approved, revised tools and comment template to
304 the SAC Chair.
305
306 (i) The CSO may communicate with the individual commenters.
307

308 (ii) The CSO shall provide a 1-week period in which individual
309 commenters can provide feedback on how their comment was
310 addressed.

311
312 NOTE: Should additional changes to the document be required as
313 a result of these discussions, the CSO will inform the SAC.
314

315 x. The CSO shall subsequently approve the tools as final.
316

317 (3) The CSO shall make the determination if internal OSHE Procedures that describe how
318 OSHE shall conducts its program roles and responsibilities (*e.g.*, industrial hygiene
319 procedures) require the SAC review as described in Section 6.b(2)(b).
320

321 (4) Prior to publishing the “final” version of the directive or other document in the
322 Documents and Records Center, the Program Manager for NIST S 7101.15 shall perform
323 a quality control check to ensure conformance with the requirements of that suborder.
324

325 c. Deployment of a Safety Directive
326

327 (1) Deployment of a safety directive shall occur via a deployment briefing once the directive
328 and all other directives (*e.g.*, procedures, guidance, forms) and documents required to
329 assist in implementing or assessing requirements are approved by the CSO.
330

331 (2) A communication regarding the deployment briefing shall be sent to relevant parties
332 (*e.g.*, OU Safety Coordinators, OU Safety Program Coordinators) at least two weeks in
333 advance of the briefing.
334

335 (3) The deployment briefing shall be provided by the OSHE PM.
336

337 (4) At the deployment briefing, the OSHE PM shall review the deployment briefing
338 presentation, any relevant directives and documents required to assist in implementing or
339 assessing requirements, and field questions from attendees.
340

341 (a) The OSHE PM shall provide additional assistance regarding deployment as
342 requested.
343

344 d. Establishment of Effective Date
345

346 (1) The CSO shall obtain concurrence from the ESC regarding the effective date of a safety
347 directive.

- 348 (2) The effective date should be communicated to stakeholders during the deployment
349 briefing.
350
- 351 (3) The effective date ends the deployment phase of a safety directive.
352
- 353 e. Revision of Safety Directives Establishing Policy or Requirements (Policy, Orders,
354 Suborders, and Notices)
355
- 356 (1) Revision of a directive may be initiated by any number of activities or events, including,
357 but not limited to, the results of audits, assessments, incident investigations, and changes
358 in federal, state, or local regulations.
359
- 360 (2) Administrative Revision (revision which does not affect a requirement, role, or
361 responsibility of the directive)
362
- 363 (a) Administrative revisions:
364
- 365 i. Shall be made on the currently approved document using “track changes”
366 mode; and
367
- 368 ii. May have a comment describing why the change was required.
369
- 370 (b) Administrative revisions shall be concurred by the DCSO, with notification to the
371 CSO.
372
- 373 (c) Administrative revisions shall not require a new version of the document.
374
- 375 (d) Administrative revisions shall be documented in the Revision History of the
376 document as “Administrative Revision” in the column indicating “Revision”.
377
- 378 (e) The CSO shall determine if notifications are required to the ESC and/or appropriate
379 customers and stakeholders.
380
- 381 (3) OSHE-Impacted Revision (revision which will affect a requirement, role, or
382 responsibility for OSHE as an organization or OSHE staff member(s) in performance of
383 their official duties, but will not change requirements, roles, or responsibilities for non-
384 OSHE NIST staff)
385
- 386 (a) OSHE-impacted revisions:
387

- 388 i. Shall be made on the currently approved document using “track changes”
389 mode; and
390
391 ii. May have a comment describing why the change was required.
392
393 (b) OSHE-impacted revisions shall be:
394
395 i. Concurred by the DCSO; and
396
397 ii. Approved by the CSO.
398
399 (c) OSHE-impacted revisions shall require a new version of the document.
400
401 (d) OSHE-impacted revisions shall be documented in the Revision History.
402
403 (e) The CSO shall determine if notifications are required to the ESC and/or appropriate
404 customers and stakeholders.
405
406 (4) NIST-Impacted Revision (revision which will affect a requirement, role, or responsibility
407 for a non-OSHE NIST staff member)
408
409 (a) NIST-impacted revisions shall:
410
411 i. Be made on the currently approved document using “track changes” mode;
412 and
413
414 ii. Have a comment describing why the change was required.
415
416 (b) To ensure a level of vetting is commensurate with the impact of the change, the CSO
417 shall determine if the revisions are “minor” or “major”.
418
419 NOTE: The CSO shall consider the scope and complexity of the change(s) and
420 whether the change(s) should be reviewed in the context of the full suborder when
421 determining whether the revision is considered “minor” or “major”.
422
423 i. Minor revisions shall require the full vetting process as found in Section
424 6.a(3), but:
425
426 (i) Shall be limited to review of only the changes; and
427

- 428 (ii) May have the review timeframes truncated, allowing timeframes
429 commensurate with the scope of the change, determined by the CSO.
430
- 431 ii. Major revisions shall require the full vetting process as found in Section
432 6.a(3).
433
- 434 (c) NIST-impacted revisions shall require a new version of the document.
435
- 436 (d) NIST-impacted revisions shall be documented in the Revision History.
437
- 438 (e) The CSO shall notify NIST appropriate staff (e.g., ESC, customers, stakeholders) of
439 this revision.
440
- 441 (5) Prior to publishing the “final” version of the directive or other document in the
442 Documents and Records Center, the Program Manager for NIST S 7101.15 shall perform
443 a quality control check to ensure conformance with the requirements of that suborder.
444
- 445 f. Revision of Safety Directives and Documents to Assist in Implementing or Assessing
446 Requirements
447
- 448 (1) Revision of directives and documents to assist in implementing or assessing requirements
449 shall follow the same process as indicated for revision of directives establishing policy or
450 requirements, Section 6.e. with the exception of the vetting process following the steps
451 delineated in Section 6.b(2) as opposed to Section 6.a(3).
452
- 453 h. Re-deployment of Revised Directives
454 The CSO shall determine the extent of the process required for re-deployment of a revised
455 safety directive which may include requirements of Section 6.c of this document.
456
- 457 i. Training
458 There is no specific training related to this suborder.
459
- 460 j. Records Required by this Suborder
461 The following records shall be kept and maintained in accordance with NIST S 7101.15:
462
- 463 (1) OSHE Draft of directives – Section 6.a(3)(a);
464
- 465 (2) SAC Draft of directives – Section 6.a(3)(b);
466
- 467 (3) ESC Draft of directives – Section 6.a(3)(c);

- 468 (4) OSHE Draft of directives and documents used to assist in implementing or assessing
469 requirements – Section 6.b(2)(a);
470
471 (5) SAC Draft of directives and documents used to assist in implementing or assessing
472 requirements – Section 6.b(2)(b);
473
474 (6) Documentation of comments and responses to those comments, *i.e.*, comment templates
475 related to Section 6.j(1) to Section 6.j(5); and
476
477 (7) Documentation pertaining to OU concurrence of the directive.
478
479

480 7. DEFINITIONS

481 Definitions common to all NIST OSH suborders can be found in Section 6 of NIST O 7101.00.
482 The definitions specific to this suborder are as follows:

- 483
484 a. Administrative Revision – A revision which does not affect a requirement, role, or
485 responsibility of the directive. Examples include, but are not limited to:
486
 - Spelling corrections; or
 - Fixing of formatting issues or hyperlinks.
487
488
489 b. Approval Date – The date the CSO official approves the safety directive document.
490
491 c. Deployment/Re-deployment – The process of NIST officially requiring OUs to begin
492 working to meet the requirements of a safety directive.
493
494 d. Deployment Briefing – A presentation used to deploy a safety directive which typically
495 contains critical information regarding important requirements and associated roles and
496 responsibilities.
497
498 e. Deployment Plan – A document that provides information on and outlines the steps
499 necessary to effectively deploy a safety directive.
500
501 f. Effective Date – The date the OUs shall have all requirements of a safety directive fully
502 implemented.
503
504 g. NIST-Impacted Revision – A revision which will change a requirement, role, or
505 responsibility for a non-OSHE NIST staff member. Examples include, but are not limited to:
506
 - Adding, modifying, or deleting a requirement affecting a non-OSHE staff member;

- 507 • Adding, modifying, or deleting a role or responsibility for a non-OSHE NIST staff
508 member; and
- 509 • Comprehensively modifying the directive resulting from regular reviews and
510 benchmarking studies
- 511
- 512 h. OSHE-Impacted Revision – A revision which will change a requirement, role, or
513 responsibility for OSHE as an organization or OSHE staff member(s) in performance of their
514 official duties, but will not change requirements, roles, or responsibilities for non-OSHE
515 NIST staff. Examples include, but are not limited to:
- 516 • Requiring an OSHE staff member to use a specific procedure to conduct an
517 assessment; or
- 518 • Assigning a new role to the CSO.
- 519
- 520 i. OU Self-Assessment Checklist – A checklist associated with deployment of a safety directive
521 which can be used to assess an OU’s implementation of the directive requirements.
- 522
- 523 j. Question Set Associated with NIST S 7101.26 – A checklist which can be used to assess the
524 implementation of a safety directive’s requirements in a given location after it is effective.
- 525
- 526

527 7. ACRONYMS

528 Acronyms common to all NIST OSH suborders can be found in Section 7 of NIST O 7101.00.
529 The acronyms specific to this suborder are as follows:

- 530
- 531 a. CSO – Chief Safety Officer
- 532
- 533 b. DCSO – Deputy Chief Safety Officer
- 534
- 535 c. EMS – Environmental Management System
- 536
- 537 d. ESC – Executive Safety Committee
- 538
- 539 e. FLS – Fire and Life Safety
- 540
- 541 f. OHSMS – Occupational Health and Safety Management System
- 542
- 543 g. OSHE – Office of Safety, Health, and Environment
- 544
- 545 h. OU – Organizational Unit
- 546

- 547 i. PM – Program Manager
548
549 j. SAC – Safety Advisory Committee
550

551
552 **8. RESPONSIBILITIES**

553 Roles and responsibilities common to all NIST OSH suborders can be found in Section 8 of
554 NIST O 7101.00. The roles and responsibilities specific to this suborder are as follows:
555

- 556 a. The CSO is responsible for overall implementation of this suborder and may delegate
557 specific tasks to the Deputy CSO.
558
- 559 b. The Deputy CSO is responsible for overseeing implementation of this suborder.
560
- 561 c. The OSHE PM is responsible for:
562
- 563 (1) Creating the first draft of the directive establishing policy or requirements;
564
 - 565 (2) Creating the first draft of the associated directives and documents used to assist in
566 implementing or assessing requirements;
567
 - 568 (3) Working with all parties to address feedback or comments on directives and tools at any
569 time in the process; and
570
 - 571 (4) Participating in the deployment or re-deployment process.
572
- 573 d. The Program Manager for NIST S 7101.15 is responsible for ensuring appropriate documents
574 conform to the requirements of the Documents and Records Control suborder.
575
- 576 e. The SAC Chair is responsible for coordinating all SAC Reviews of documents.
577
- 578 f. SAC Members are responsible for, when applicable:
579
- 580 (1) Coordinating all SAC Reviews of documents within their OU; and
581
 - 582 (2) Ensuring OU staff who may be affected by the directive are offered the opportunity to
583 participate in the review process.
584
585
586

587 g. ESC Members are responsible for:

588

589 (1) Providing a high-level review of the documents focusing on overall policy decisions and
590 associated roles and responsibilities during the “ESC Review”; and

591

592 (2) Voting for or against concurrence on the final draft of a document as requested by the
593 CSO.

594

595

596 **9. AUTHORITIES**

597 There are no authorities specific to this suborder alone. For authorities applicable to all NIST
598 OSH suborders, see section 9 of NIST O 7101.00.

599

600

601 **10. DIRECTIVE OWNER**

602 Chief Safety Officer

603

604

605 **11. APPENDICES**

606 A. Revision History

607 B. Example of Safety Suborder and Tool Comment Template

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611

Appendix A. Revision History

Version No.	Approval Date of Revision	Effective Date for Revision	Brief Description of Change; Rationale
1	03/03/2025	03/03/2025	<ul style="list-style-type: none">• None – Initial document

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