

# HAZARD REVIEW

NIST S 7101.20

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<sup>1</sup> For revision history, see Appendix A.

32 **1. PURPOSE**

33 This suborder establishes the requirements and associated roles and responsibilities for  
34 conducting hazard reviews, also called Job Hazard Analyses or JHAs. This is the process of  
35 planning job or work activities in a manner that incorporates:

- 36 • Identifying hazards associated with performing job or work activities;
- 37 • Specifying means to control identified hazards; and
- 38 • Assessing risk associated with performing work activities with controls in place.

39

40 This suborder also defines requirements and associated roles and responsibilities for:

- 41 • Approving activities covered by hazard reviews to commence based on  
42 implementation of documented controls and acceptance of the residual risk; and
- 43 • Authorizing staff to perform activities covered by hazard reviews based on activity-  
44 specific knowledge, skills, and abilities.

45

46

47 **2. BACKGROUND**

48 The General Duty Clause of the Occupational Safety and Health Act of 1970 requires  
49 employers to provide a workplace free from recognized hazards. This suborder specifies the  
50 requirements used to assess work activities, identify hazards, and document the measures  
51 taken to mitigate identified hazards.

52

53

54 **3. APPLICABILITY**

55 a. Requirements of this suborder apply to:

56

- 57 (1) All work-related activities and stages of work conducted by NIST employees and covered  
58 associates (for the purposes of this document referred to as NIST staff) as part of their  
59 assigned duties under normal operating conditions, except those listed in Section 3.b.  
60 below; and

61

62 NOTE: Stages of work include but are not limited to work for set-up,  
63 construction, fabrication, prototyping, acceptance testing, commissioning,  
64 troubleshooting, maintenance, normal operations, routine activity, non-routine  
65 activity, decommissioning, and tear-down, and includes fieldwork. That is, all  
66 hazardous work activities must be reviewed according to the process described by  
67 this suborder, not just the primary research experiment or primary activity.

68

- 69 (2) Any activity for which personal protective equipment (PPE) is *required* to mitigate the  
70 activity's safety risks.

71

72 b. Requirements of this suborder do not apply to:

73

74 (1) *Common Everyday Activities or Tasks Performed Routinely by Members of the General*  
75 *Public at Work and Home and that Do Not Involve Extraordinary Hazards* such as  
76 working at a computer, walking, climbing stairs, using scissors, or short step stools;

77

78 (2) *Inherently Low-Risk Activities* that present low safety risks without actively  
79 implementing any safety controls to mitigate those risks<sup>2</sup>; and

80

81 (3) Contractors operating under their employer's safety plan are not Covered Associates,  
82 however, may be required to have Hazard Reviews/JHAs per their contractor safety plan.  
83 NIST staff inspecting or observing contractor work may be required to have a Hazard  
84 Review when stipulated by this Applicability Section.

85

86 (4) Activities for which PPE is:

87

88 (a) Required solely for entry into space and not used for protection from the hazards  
89 associated with an activity;

90

91 (b) Used *voluntarily* as an additional elective layer of protection for comfort or  
92 convenience<sup>3</sup>; or

93

94 (c) Worn solely to protect equipment or materials.

95

96 These exemptions do not relieve staff or line management from their responsibility to  
97 manage safety-related risks associated with common tasks and inherently low-risk  
98 activities.

99

100 (4) When abnormal work conditions introduce hazards to work that would otherwise be  
101 exempt from the requirement to perform a hazard review and specific controls are  
102 required above and beyond standard workplace emergency protocols or general guidance  
103 to perform the work, the work must be covered by an approved hazard review.

104

105

#### 106 4. REFERENCES

107 a. Public Law 91-596, 84 Stat. 1590. Occupational Safety and Health Act of 1970, Section 5.

108 (a) (1) General Duty Clause

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<sup>2</sup> This includes activities that involve use of equipment with built-in safety features that do not require written safe work practices, are not easily defeated, and will not be intentionally defeated or separated from the equipment.

<sup>3</sup> For voluntary use of respiratory protection see requirements in NIST S 7101.58.

- 109 b. 29 Code of Federal Regulations (CFR) 1910.120, [Hazardous Waste Operations and](#)  
110 [Emergency Response \(HAZWOPER\)](#)  
111  
112 c. 29 CFR 1910.132, [Personnel Protective Equipment](#).  
113  
114 d. 29 CFR 1910.134, [Respiratory Protection](#)  
115  
116 e. 29 CFR 1910.156, [Fire Brigades](#)  
117  
118 f. 29 CFR 1910.1450, [Occupational exposure to hazardous chemicals in laboratories](#)  
119  
120 g. ANSI Z10-2019 Occupational Health and Safety Management Systems  
121  
122 h. ANSI Z10.100 Guidance and Implementation Manual for ANSI/ASSP Z10.0-2019  
123 Occupational Health and Safety Management Systems  
124  
125 i. NIST Occupant Emergency Plan ([Boulder](#))  
126  
127 j. NIST Occupant Emergency Plan ([Gaithersburg](#))  
128  
129

130 **5. APPLICABLE NIST DIRECTIVES**

- 131 a. NIST O 7101.00: [Occupational Safety and Health Management System](#)  
132  
133 b. NIST S 7101.03: [Stop Work](#)  
134  
135 c. NIST S 7101.23: [Safety Education and Training](#)  
136  
137 d. NIST S 7101.29: [Medical Surveillance Program](#)  
138  
139 e. NIST S 7101.58: [Respiratory Protection](#)  
140  
141 f. NIST S 7101.60: [Chemical Management](#)  
142  
143 g. NIST S 7101.64: [Electrical Safety](#)  
144

145 NOTE: Occupational safety and health directives, which are part of the NIST Safety  
146 Management System (SMS), specify requirements for working with hazardous materials  
147 (e.g., biological materials, chemicals, compressed gases, cryogenics) and equipment (e.g.,

148 forklifts, ladders, machines, and tools). These suborders should be consulted when  
149 selecting controls to mitigate these hazards.

150  
151

## 152 **6. REQUIREMENTS**

### 153 a. Leading and Participating in Hazard Reviews

154

155 (1) An Activity Lead shall be identified for each hazard review.

156

157 (a) The Activity Lead shall be a competent staff member with appropriate knowledge,  
158 skills, and abilities regarding the job or work activity who is responsible for:

159

160 i. Conducting the activity; or

161

162 ii. Overseeing the activity with or without formal line management  
163 responsibilities<sup>4</sup>

164

165 (b) The Activity Lead shall:

166

167 i. Lead the hazard review process;

168

169 ii. Ensure all required hazard review elements are documented clearly and  
170 completely; and

171

172 iii. Solicit input from others who are or will be conducting the work.

173

174 (2) The Activity Lead, in coordination with appropriate line management, shall determine  
175 whether a Development Team is required to assist in conducting the hazard review.

176

177 (a) A Development Team shall be required when specified in Appendix B (Work,  
178 Hazards, and Controls that Require OSHE Participation on Development and Review  
179 Teams) or when the Activity Lead or line management deems participation of others  
180 necessary to obtain adequate technical and safety knowledge, skills, and abilities to  
181 identify hazards, specify controls and assess residual risk for the work activity  
182 covered by the scope of hazard review.

183

184 (b) If it is determined that a Development Team is not necessary, the Activity Lead  
185 should consult appropriate technical and safety experts as necessary to conduct the  
186 hazard review.

---

<sup>4</sup> Please see Section 6.c(4) for special conditions of approving work if a line manager is the Activity Lead.

187 b. Conducting and Documenting Hazard Reviews

188

189 (1) Work Activity Description. Provide an activity description to facilitate identification of  
190 hazards and selection of appropriate controls. Activity description documentation shall  
191 include the following elements:

192

193 (a) Scope of the work – Briefly describe the work activity or activities<sup>5</sup> covered by the  
194 hazard review, *e.g.*, set-up, tear-down, acceptance testing, commissioning, prototype  
195 testing, calibration, routine analysis, or decommissioning.

196

197 i. Specific tasks that are part of larger project or work activity:

198

199 (i) Shall be incorporated into the hazard review and not covered by a  
200 separate generic hazard<sup>6</sup> review when it is necessary to ensure that all  
201 synergistic hazards are fully assessed in the context of the larger work  
202 activity; or

203

204 (ii) May be covered by a separate generic hazard review when the generic  
205 hazard review covers all hazards and controls needed in the context of  
206 the larger activity.

207

208 (b) Frequency of the work – Specify how often the work activity is conducted, *e.g.*,  
209 weekly, monthly, occasionally as needed, one time, typically less than yearly.

210

211 (c) Physical Location – Identify the physical location(s) where the work will be  
212 conducted, noting any applicable restrictions relevant to conducting the work in the  
213 specified location(s).

214

215 (d) Specific Activity Description – Identify the specific steps or tasks performed under  
216 the scope of the hazard review. For each activity, the following shall be identified:

217

218 i. Steps or tasks that involve exposure to specific hazards;

219

220 ii. Equipment or tools to be used;

221

---

<sup>5</sup> A hazard review may cover a simple task comprised of several steps, a work activity comprised of multiple tasks, or a project consisting of many activities. When determining the scope of a hazard review, the activity lead should consider the dependencies of multiple activities, task frequency, and whether all staff will be approved for all tasks.

<sup>6</sup> Generic Hazard Review is a hazard review that covers a basic, non-complex, common task that is performed routinely and for which hazards are well known, well controlled and for which the relative hazard index is  $RHI \leq 2$ ; examples include soldering, cleaning optics, filling squeeze bottles with isopropanol, *etc.*



260 additional hazards that require controls shall be documented as an addendum to  
261 the hazard review for the activity.

262

263 (3) Emergency Response Plan. An emergency response plan(s) shall be developed and  
264 documented when foreseeable emergency scenario(s) cannot be adequately managed by  
265 employing the local campus NIST Occupant Emergency Plan, or host provided plan.

266

267 (a) Where required, an emergency response plan shall include:

268

269 i. Activity- or equipment-specific emergency response or shut-down protocols  
270 required to ensure safe operations or to place equipment in safe configuration  
271 in the event of a power failure, building evacuation, or other foreseeable off-  
272 normal condition;

273

274 ii. Activity-specific equipment and supplies required for incident response, *e.g.*,  
275 communications (*e.g.*, phones<sup>8</sup>, alarms), eye washes, safety showers, fall  
276 rescue and descent equipment, emergency shut-off switches, panic buttons,  
277 specialty spill containment equipment, special-purpose vacuum cleaner; and

278

279 iii. Any additional requirements to assist out-of-hours workers.

280

281 (b) An emergency response plan for fieldwork must take into consideration availability  
282 of amenities, utilities, and emergency response capabilities.

283

284 (4) Identification of Hazards. For each activity specified in the work planning stage, all  
285 sources of hazards associated with the specific tasks and steps shall be identified and  
286 documented.

287

288 (a) Results of any exposure assessments or calculations performed to characterize or  
289 quantify identified hazards shall be included in the documentation<sup>9</sup>; and

290

291 (b) Hazard identification for fieldwork shall include assessments of environmental  
292 conditions and physical and environmental hazards<sup>10</sup>.

293

294 (5) Identification of Controls. Control(s) specific to each hazard shall be selected based on  
295 efficacy of hazard mitigation and fully described in the hazard review document.

296

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<sup>8</sup> Per 47 U.S.C. § 623(b): Must be in working condition; and able to contact 911.

<sup>9</sup> For example, oxygen deficiency calculations or noise exposure calculations.

<sup>10</sup> Use a Fieldwork Pre-Project Safety Plan (a form to facilitate completion of Hazard Review) or a similar approach to evaluate physical and environmental hazards as well as mitigating measures as appropriate.

- 297 (a) The selection of control(s) shall be based on the “hierarchy of controls”; see  
298 Appendix C.  
299
- 300 (b) Where procedures (*e.g.*, standard operating procedures that specify how to conduct  
301 the work, or safe operating procedures that specify required safety precautions),  
302 instrument manuals, safety data sheets or other documents are required as  
303 administrative controls for specific hazards, these shall be included, or their location  
304 referenced in the documentation.  
305
- 306 (c) Training controls shall be specified, including applicable NIST-level safety training<sup>11</sup>  
307 and OU-activity specific training required to perform work safely.  
308
- 309 (d) Where PPE is selected, the type required shall be fully specified (*e.g.*, glove material  
310 and thickness; laser glasses with optical density and frequency range; respiratory  
311 mask type and cartridge).  
312
- 313 (e) The Activity Lead, in consultation with the supervisor of the activity, shall determine  
314 when verbal or written pre-work briefings are required as controls for tasks assessed  
315 as Relative Hazard Index (RHI) = 3, and when required, shall specify the frequency  
316 of briefings as necessary.  
317
- 318 (f) Where roles for individuals are listed in the controls (*e.g.*, serving as a “buddy” to  
319 help mitigate risk, fire watch, or spotter during a crane lift), the responsibilities and  
320 required training for each role shall be included in the documentation.  
321
- 322 (g) Specific consideration of appropriate controls (*e.g.*, required oversight, the buddy  
323 system, prescribed frequency of check-in with or by supervisors, restrictions on  
324 activity duration or hours performed) shall be given to work performed alone, outside  
325 of normal business hours (7:00 am to 7:00 pm), including shift work or for any  
326 situation where psychosocial hazards may amplify physical hazards.  
327
- 328 (h) All identified controls must be implemented properly and maintained as effective to  
329 mitigate the associated hazards, *i.e.*, equipment used as controls shall be maintained  
330 in good working condition, protected from decline, and used properly (*e.g.*, a  
331 laboratory hood must be functioning properly, certified, not blocked with stored items  
332 in a manner that would impede airflow, and users must use the hood properly; gloves  
333 cannot be ripped or degraded and must be properly donned and doffed).

---

<sup>11</sup> NIST-level safety training that is not specific to the activity or applies more generally to the position, *e.g.*, as PPE training and hazard communication training apply to chemists, does not need to be specified as a control in the hazard review.

334 (6) Risk Assessment. For each hazard identified, the risk of exposure to the hazard while  
335 conducting the work activity as specified in the hazard review shall be estimated and  
336 documented.

337  
338 (a) Risk shall be assessed assuming all identified controls have been implemented and  
339 are effective.

340  
341 (b) Risk shall be estimated by assigning a relative hazard index value using the matrix  
342 shown in Appendix D, based on the combination of:

- 343  
344 i. Potential severity associated with exposure to the hazard;  
345  
346 ii. Estimated likelihood of being exposed to that hazard while performing the  
347 work as specified in the hazard review;

348  
349 NOTE: RHI values for any given hazard may be reduced by modifying  
350 previously identified controls; or adding new controls.

351  
352 (c) The overall work activity risk shall be assigned an RHI value equal to the highest  
353 RHI value of any given hazard specified in the hazard review.

354  
355 c. Approving and Concurring Work Activities

356  
357 (1) Work covered by the requirements of this suborder shall be planned, documented,  
358 reviewed, approved, and concurred prior to commencing work covered by the hazard  
359 review.

360  
361 (2) Work shall be approved by the line management<sup>12</sup> of the activity lead based on:

362  
363 (a) Review of the hazard review documentation; and

364  
365 (b) For  $RHI \geq 2$  activities, observation of the activity in the work location, as feasible.

366  
367 i. For a new, unapproved activity that has no authorized users, conditional  
368 approval shall be granted to conduct the work for the purpose of observing the  
369 work to assess the adequacy of the hazard review and specified controls.

370  
371 ii. When it is not feasible to observe work prior to approval, *e.g.*, for field work  
372 or when there is only one instance of the work (*e.g.*, commissioning a new

---

<sup>12</sup> Please see Section 6.f for requirements when staff or space from multiple OUs are involved in the hazard review.

373 instrument) OUs may grant approvals based on partial observation, a walk-  
374 through to assess adequacy of controls, or observation of a “dry run” where  
375 feasible.

376  
377 NOTE: There are two types of observations required as part of the  
378 hazard review process for  $RHI \geq 2$  activities: one to assess the adequacy  
379 of the hazard review prior to final approval (see Section 6.c(2)) and the  
380 other to assess worker competency prior to authorization to perform  
381 work (see this section). Hazard Review adequacy and worker  
382 competency may be conducted simultaneously when practical.

383  
384 (3) Approval by line management shall signify the following requirements.

- 385
- 386 (a) Hazard review documentation has been thoroughly reviewed for accuracy and  
387 completeness to verify compliance with applicable SMS requirements.
  - 388
  - 389 (b) The work has been described and scoped appropriately.
  - 390
  - 391 (c) The work location:
    - 392
    - 393 i. Is suitable to conduct the work;
    - 394
    - 395 ii. Is compatible with other work to be performed in the location; and
    - 396
    - 397 iii. Includes identified equipment needed to work safely or respond to  
398 emergencies (e.g., eye washes for work with corrosives; laboratory hoods,  
399 flammable cabinets for work with flammable solvents).
    - 400
  - 401 (d) Observable or reasonably anticipated hazards have been identified.
  - 402
  - 403 (e) Controls, including specified PPE,<sup>13</sup> are implemented and effective (provide the level  
404 of protection anticipated or planned to mitigate the hazards).
  - 405
  - 406 (f) Documented procedures reflect actual practice.
  - 407
  - 408 (g) RHI values assigned to each hazard are reasonable.
  - 409

---

<sup>13</sup> The approved hazard review serves as the Certification of Hazard Assessment required by 29 CFR 1910.132, *Personal Protective Equipment*.

410 (h) The overall work RHI represents an acceptable level of risk, *i.e.*, the risk is as low as  
411 reasonably practical in the context of the work and work location.  
412

413 (4) For hazard reviews with an overall evaluation of  $RHI = 1$ , the first-level supervisor of the  
414 activity leader may approve the work.  
415

416 NOTE: If Activity Lead is a supervisor, their supervisor shall be required to approve  
417 the activity, *i.e.*, supervisors may not approve their own hazard reviews.  
418

419 (5) For hazard reviews with an overall evaluation of  $RHI \geq 2$ :  
420

421 (a) A Review Team<sup>14</sup> shall be required to concur with the elements in Section 6.b prior to  
422 line management approval.  
423

424 i. The Review Team shall consist of staff with sufficient expertise in hazard  
425 identification and specification of controls and sufficient expertise to verify  
426 compliance with applicable SMS requirements such as:  
427

428 (i) Subject matter expert(s) with technical expertise with respect to the  
429 work under review, *e.g.*, a NIST staff member or external participant;  
430

431 (ii) OU or Division, full-time or collateral duty safety staff (*e.g.*, Division  
432 Safety Representative or Safety Program Coordinator, or similar), or  
433 specified proxy safety subject matter experts; and  
434

435 (iii) When required as specified in Appendix B, appropriate OSHE staff  
436 members.  
437

438 ii. The Review Team membership shall be documented (in the Hazard Review  
439 Documentation) as part of the approval process, with an indication of the task  
440 each one engaged in *i.e.*, review of hazard review documentation and/or work  
441 observation.  
442

443 (b) Hazard reviews shall be approved by line managers at a level that is commensurate  
444 with risk as estimated by the overall work RHI value.  
445

446 i.  $RHI = 2$  shall be approved by:  
447

---

<sup>14</sup> NIST Guidance Document 7101.20 provides additional information regarding the constitution and qualifications of the Review Team and the general conduct of Hazard Reviews.

- 448 (i) Official first-level supervisor (*e.g.*, group leader);  
449  
450 (ii) Official second-level supervisor (*e.g.*, division chief), in consultation  
451 with their full-time or collateral duty safety personnel or designated  
452 alternate safety-subject matter expert; and  
453  
454 (iii) With concurrence of the OSHE Review Team member for activities  
455 with one or more hazards for which severity was rated as  
456 “Catastrophic” or “Severe”, regardless of likelihood, and as required in  
457 Appendix B.  
458  
459 ii. RHI = 3 shall be approved by:  
460  
461 (i) Official first-level supervisor (*e.g.*, group leader);  
462  
463 (ii) Official second-level supervisor (*e.g.*, division chief), in consultation  
464 with their full-time or collateral duty safety personnel or designated  
465 alternate safety-subject matter expert;  
466  
467 (iii) OU Director, in consultation with their OU Safety Coordinator or  
468 designated alternate safety-subject matter expert; and  
469  
470 (iv) With concurrence of the OSHE Review Team member.  
471  
472 iii. RHI = 4 shall not be approved and the work shall not be conducted at NIST.  
473  
474 iv. Special considerations:  
475  
476 (i) Work involving minors (*i.e.*, those under age 18) that could result in  
477 exposure to a hazard with RHI = 2 shall require approval as if the  
478 overall work was RHI = 3.  
479  
480 (ii) Work for which the overall RHI level is determined by one or more  
481 hazards that are fully controlled to industry standards (as defined by  
482 OSHE) may be approved at one RHI value lower. However, the RHI  
483 remains the same value, that is, it is not lowered or decreased.  
484  
485 (6) Concurrence by Upper-Level Management  
486

- 487 (a) After approval of the hazard review, upper-level management shall provide their  
488 concurrence.  
489
- 490 (b) Concurrence shall signify the line manager has determined:  
491
- 492 i. Those who developed and reviewed the hazard review have the appropriate  
493 knowledge, skills, and abilities to effectively participate in the hazard review  
494 process; and
  - 495
  - 496 ii. The overall RHI assigned to the work is reasonable for the activities to be  
497 performed with the identified controls implemented.  
498
- 499 (c) For RHI = 1, all new and revised hazard reviews shall be reviewed and concurred  
500 upon by division-level management, in consultation with their full-time or collateral  
501 duty safety personnel or designated alternate safety-subject matter expert.  
502
- 503 (d) For RHI = 2, all new and revised hazard reviews shall be reviewed and concurred  
504 upon by OU-level management, in consultation with their OU Safety Coordinator or  
505 designated alternate safety-subject matter expert.  
506
- 507 (e) If upper-level management does not concur, the hazard review shall be returned to the  
508 lower-level line manager who approved the work with an explanation as to why.  
509
- 510 i. The lower-level line manager shall request concurrence again once the  
511 feedback has been appropriately addressed.  
512
- 513 (f) Concurrence shall be documented on the hazard review.  
514
- 515 d. Authorizing Workers<sup>15</sup>  
516
- 517 (1) Prior to conducting work covered by a hazard review, each staff member shall be  
518 authorized to perform work covered by an approved hazard review by their official first-  
519 level supervisor (or higher-level manager) based on the following:  
520
  - 521 (a) Completion of required training as specified within the hazard review, training on the  
522 NIST safety programs that apply to activity, and where necessary, training on  
523 activity-specific emergency response procedures;  
524

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<sup>15</sup> Please see Section 6.e for requirements when staff or space from multiple OUs are involved in the hazard review.

- 525 (b) Confirmation that the staff member has reviewed the hazard review documentation  
526 (e.g., procedures or manuals included or referenced, the list of identified hazards and  
527 associated controls, safety data sheets, emergency response plans); and  
528
- 529 (c) Confidence that the staff member is competent and has level of expertise necessary to  
530 perform the work safely and correctly (this may be based on personal knowledge,  
531 observation<sup>16</sup>, and where applicable, reliable input from others).  
532
- 533 (d) Due consideration of adequacy of the specified controls to help ensure safety and  
534 well-being of the individual staff member, considering any psychosocial hazards.  
535 Where necessary, additional controls, work precautions, or other requirements shall  
536 be documented.  
537
- 538 (e) For work involving a hazard with an RHI  $\geq 2$ , the staff member shall be observed  
539 conducting the work, including implementing the specified controls, by one or more  
540 observers who have the knowledge, skills, and abilities to assess technical  
541 competency and proficiency in safety-related tasks and use of controls.  
542
- 543 i. The observation shall be documented as part of the authorization and shall  
544 specify:  
545
- 546 (i) Tasks observed;  
547
- 548 (ii) Competencies assessed; and  
549
- 550 (iii) The individuals who performed the observation.  
551
- 552 (f) Staff may be authorized by task or step, if necessary, rather than by the entire  
553 activity hazard review. Documentation shall reflect the scope of approval as  
554 necessary.  
555
- 556 (2) OU's that wish to grant limited scope or conditional authorization for staff-in-training  
557 shall clearly define the limits on the scope of work permitted and any conditions required  
558 for the authorization (e.g., hands-on training provided, work must be supervised), specify  
559 OU requirements and authorization process in their OU procedure(s); see Section 6.h).  
560

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<sup>16</sup> This is a one-time observation for approval unless deficiencies are noted during the observation or later. Observation would be required for reapproval, three years later, or more frequently as determined in the Hazard Review

561 e. Multi-OU Hazard Reviews

562

563 (1) A hazard review shall be owned by the *de facto* lead OU<sup>17</sup>, typically the OU of the  
564 Activity Lead.

565

566 (a) The *de facto* OU shall be responsible for:

567

568 i. Conducting and documenting the hazard review (per Section 6.b); and

569

570 ii. Approving the work activity (per Section 6.c).

571

572 (b) Where the OU of the specified activity location in the hazard review differs from the  
573 OU of the Activity Lead, the line manager responsible for the work location shall  
574 concur with the approval of the work through:

575

576 i. Participation on the review team; or

577

578 ii. If applicable, by OU-specified approval processes.

579

580 (2) Authorizing staff to perform work from outside the *de facto* OU shall require the  
581 authorization of:

582

583 (a) Their first-level supervisor; and

584

585 (b) The approving supervisor of the work from the *de facto* OU.

586

587 f. Periodic Review and Revision of Hazard Reviews; Re-Approval and Re-Authorization

588

589 (1) Approved hazard reviews shall be reviewed periodically according to the process in  
590 Section 6.b, to determine whether any changes or modifications are necessary.

591

592 (a) The frequency of re-review:

593

594 i. Shall be established by the Activity Lead, in concurrence with OU line  
595 management, at the time of approval (re-review);

596

597 ii. Based on the potential for changes in work; and

598

599 iii. Shall not exceed three years.

---

<sup>17</sup> If the *de facto* lead OU is not obvious, the involved OUs shall discuss the work and specify a lead OU.

- 600 (b) Work may continue while the hazard review is undergoing a re-review.  
601  
602 i. Work must be suspended, or a stop work order shall be instituted immediately  
603 (per the requirements of NIST S 7101.03) if the review determines an  
604 identified hazard is not adequately controlled.  
605  
606 (2) Upon completion of the re-review, if no changes are needed, the OU shall determine  
607 whether refresher training is needed for authorized users.  
608  
609 (3) Hazard Reviews shall be revised:  
610  
611 (a) Immediately when it is recognized that scope of the work has changed (*i.e.*, steps,  
612 tasks, materials, equipment, or specified boundary conditions), work practices have  
613 changed, new hazards have been identified, or there is evidence that the specified  
614 controls are inadequate (or there is any deficiency in the current hazard review); and  
615  
616 (b) Work shall be suspended, or a stop work order shall be instituted (per the  
617 requirements of NIST S 7101.03) if an identified hazard is not adequately controlled  
618 while the hazard review is undergoing a revision<sup>18</sup>.  
619  
620 (c) For minor revisions that do not directly impact the health and safety of the workers,  
621 work may continue under the original approved hazard review, with approval of the  
622 Official first-level supervisor (*e.g.*, group leader), based on the information therein.  
623 However, revisions involving new hazards or any decrease in controls must be  
624 reviewed and approved at the appropriate management level prior to working.  
625  
626 (4) Re-approval of revised hazard reviews shall follow the requirements in Section 6.c with  
627 the level of review determined by the highest RHI of the tasks, hazards or controls that  
628 were changed in the revision; *e.g.*, changes to an RHI = 1 task may be approved at the GL  
629 level, regardless of the overall activity RHI.  
630  
631 (5) When hazard reviews are revised, re-authorization of staff shall follow the requirements  
632 in Section 6.d, with the supervisor:  
633  
634 (a) Ensuring that workers have been informed of the specific changes to the hazard  
635 review;  
636

---

<sup>18</sup> Administrative, minor revisions that do not impact hazard mitigation may be done at any time without stop work.

637 (b) Determining whether the specific changes require additional or new training (e.g.,  
638 training on new hazards identified or conduct of new procedures), or refresher  
639 training; and

640  
641 (c) Determining whether new observations are needed to ensure worker competency.

642  
643 g. OU-Level Procedures

644  
645 (1) A documented OU procedure(s) shall be developed, provided to OSHE for review, and  
646 final version(s) maintained by each OU to specify:

647  
648 (a) Any OU-specific roles or responsibilities required to implement this suborder;

649  
650 (b) OU processes for determining the adequacy of Development Team and Review Team  
651 member expertise for any activity with a hazard that is potentially Catastrophic or  
652 Severe, regardless of likelihood, and all RHI 3 activities.;

653  
654 (c) OU requirements for conditional authorization of staff-in-training, including  
655 requirements to specify hands-on training, degree of oversight, any additional  
656 controls or limitations on the work conducted;

657  
658 (d) Required training on the OU procedure(s); and

659  
660 (e) Required review period of OU procedure(s).

661  
662 NOTE: OUs should not include the requirements of this suborder in their OU  
663 procedure except where necessary to provide context for the OU-specific  
664 requirements established.

665  
666 h. Training Requirements

667  
668 (1) Safety program training on this Suborder shall be completed by:

669  
670 (a) Staff who participate in the development of or review hazard reviews (Development  
671 Team and Review Team, respectively);

672  
673 (b) Line managers who approve hazard reviews; and

674  
675 (c) Line managers who authorize staff to perform work under a hazard review.

676

- 677 (2) Training on the conduct of hazard reviews shall be completed by:  
678  
679 (a) Staff who participate in the development or review of hazard reviews (Development  
680 Team and Review Team); and  
681  
682 (b) Line managers who approve hazard reviews.  
683  
684 (3) Prior to performing work, as a condition of authorization, staff shall:  
685  
686 (a) Review the hazard review documentation (best practice would include a discussion  
687 with the Activity Lead or experienced individual);  
688  
689 (b) Complete the required NIST-level and OU activity-specific training (including but  
690 not limited to activity specific: emergency response, energy source, hazardous  
691 materials, physical hazards, mitigating measures, *etc.*) associated with the hazard  
692 review; and  
693  
694 (c) Participate in verbal or written pre-work briefings when specified in the hazard  
695 reviews and described below:  
696  
697 i. The briefing, verbal or written, shall cover, as applicable, the following  
698 subjects: work procedures, associated hazards, special precautions, controls  
699 including required PPE and other mitigating measures, energy sources, stop  
700 work authority, and emergency response procedures.  
701  
702 ii. A staff member working alone who is required to perform pre-work briefings,  
703 shall review the written briefing or at a minimum, examine the relevant part(s)  
704 of the hazard reviews to ensure the activity to be performed is reviewed,  
705 emergency response plans are reviewed, as if a verbal briefing occurred.  
706  
707 iii. Frequency of pre-work briefings shall be specified in the hazard reviews.  
708  
709 iv. As part of the OU procedure(s), the requirement to document and keep  
710 records of these briefings shall be specified.  
711  
712 i. Records  
713  
714 (1) Copies of all current hazard review, including work and worker authorizations, shall be  
715 maintained in hard copy or electronic form (recommended) by the OU that owns the  
716 hazard review.

717 (2) Copies of hazard reviews, including work and worker authorizations, for work that has  
718 ceased shall be maintained in hard copy or electronic form for at least one (1) year by the  
719 OU that owns the hazard review.

720

721 NOTE: Per the requirements of NIST S 7101.29, OSHE shall maintain copies of  
722 hazard reviews that involve exposure monitoring.

723

724 (3) NIST-level training required by this suborder shall be documented and recorded in  
725 accordance with the requirements of NIST S 7101.23.

726

727 (4) NIST-level training and OU activity-specific training required by a specific hazard  
728 review shall be documented and recorded in accordance with the requirements of NIST S  
729 7101.23.

730

731

## 732 7. DEFINITIONS

733 a. Activity Lead – A staff member who is competent with respect to the activity covered by the  
734 hazard review, based on relevant knowledge, skills, and abilities, and who is responsible for  
735 either conducting the activity or overseeing the activity with or without formal line  
736 management responsibilities. The "Activity Lead" is typically the person in charge of  
737 conducting or overseeing the work with or without formal line management responsibilities,  
738 *e.g.*, the principal investigator, supervisor, manager, foreman, or shop steward.

739

740 b. Abnormal Conditions – State caused by external factors not expected to occur as part of  
741 normal work or anticipated as off-normal conditions and that present additional hazards.

742

743 c. Activity – A job, experiment, operation, process, or procedure, often comprising subtasks,  
744 conducted to achieve a specific outcome. (Also, job or work activity).

745

746 d. Buddy System – A buddy system<sup>19</sup> is a means of organizing staff to ensure that every staff  
747 member is being monitored or observed by another staff member who can provide rapid  
748 assistance in the event of an emergency.

749

750

751

752

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<sup>19</sup> A buddy system is explicitly required, in some situations for: Hazardous Waste Operations and Emergency Response (HAZWOPER), 29 CFR 1910.120; Respiratory Protection, 29 CFR 1910.134 Immediately dangerous to life or health (IDLH); Fire Brigades, 29 CFR 1910.156 (primarily emergency operations involving interior structural firefighting); and Section 5(a)(1) of the Occupational Safety and Health Act of 1970 (General Duty Clause- when required by the hazard assessment, *i.e.*, there is a well-recognized serious hazard).

753 e. Concurrence

754

755 (1) As it relates to an OSHE Review Team Member – As part of the process for hazard  
756 review approval, agreement with the overall detailed analysis of the work to be  
757 performed, potential hazards, and appropriate control measures to mitigate those hazards.  
758

759

760 (2) As it relates to upper-level management – Subsequent to approval of the hazard review,  
761 agreement that those who participated in the development or re-review of the hazard  
762 review had the appropriate KSAs to do so and given the implemented control measures  
763 the RHI is deemed appropriate for the overall work to be performed.

764

765 f. Controls – Actions, procedures, alarms, signage, devices, equipment, *etc.*, that can be used to  
766 eliminate or mitigate a hazard.

767

768 g. Development Team – A group of two or more people, organized by the Activity Lead, who  
769 collectively have the technical and safety knowledge, skills, and abilities necessary to  
770 conduct the hazard review, specifically to identify hazards, specify controls and assess risk  
771 for the specific activity under consideration.

772

773 NOTE: Others may participate or contribute as needed. Development Team membership  
774 is formally documented in the hazard review.

775

776 h. Fieldwork – A work location that is not a single, well-controlled, defined workplace and that  
777 may vary. Examples include providing on-location services to other organizations or  
778 collecting samples or data or making measurements in the natural environment.

779

780 i. Fully Controlled to Industry Standards (Used in Reference to Hazards) – Controlled by a  
781 device, apparatus, or system being designed in accordance with applicable regulatory and  
782 consensus standards and predicated upon that device, apparatus, or system being used in a  
783 prescribed manner. The mitigation of hazards that are fully controlled to industry standards  
784 relies primarily on built-in/engineering controls or inherent design features but may, in some  
785 cases, rely upon best practices. In either case, the control should be traceable to a broad  
786 industry, consensus-based set of controls.

787

788 j. Generic Hazard Review – A hazard review that covers a basic, non-complex, common task  
789 that is performed routinely and for which hazards are well known, well controlled and for  
790 which the relative hazard index is  $RHI \leq 2$ .

- 791 k. Hazard – Source, situation, or act with a potential for harm in terms of human injury or ill  
792 health, adverse impact on the environment, damage or loss of equipment or property, or a  
793 combination of these (from NIST O 7101.00).<sup>20</sup>  
794
- 795 l. Hazard Identification – Process of recognizing that a hazard exists and defining its  
796 characteristics (from NIST O 7101.00).  
797
- 798 m. Hazard Review – Process for planning work consisting of hazard identification, selection of  
799 controls (using the hierarchy of controls) specific to the identified hazards and performing a  
800 risk assessment; also used to describe the documentation resulting from the process.  
801
- 802 n. Hierarchy of Controls – A range of hazard control methods arranged in order of  
803 implementation preference from elimination to substitution, engineering controls,  
804 administrative controls, and personal protective equipment.  
805
- 806 o. Inherent/Built-In Controls – Features of a system's design that prevent or limit the severity of  
807 the consequences of system failure. Inherent/built-in controls cannot be defeated or  
808 separated from the system without conscious or willful effort.  
809
- 810 p. Job Hazard Analysis – a technique that focuses on job tasks to identify hazards before they  
811 occur. It focuses on the relationship between the worker, the task, the tools, and the work  
812 environment to identify and mitigate hazards.  
813
- 814 q. Likelihood – A relative and qualitative estimate of the probability of a hazardous event or  
815 exposure for a selected unit of time item or work being considered.  
816
- 817 r. Line Management – For the purposes of this suborder, the OU Director, Division Chief, and  
818 Group Leader, or equivalent.  
819
- 820 s. Off-Normal Conditions – States or operational occurrences which may be expected to occur  
821 but that are generally outside routine or planned operations, e.g., power failures.  
822
- 823 t. Psychosocial Hazard – Source or situation arising from the interrelationship of social factors,  
824 including work organization or environment, physical health, and individual behavior that  
825 has the potential to cause an adverse effect on the physical, mental, or cognitive condition of

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<sup>20</sup> See also *OSHA 3071, Job Hazard Analysis, 2002 (revised)* defines a hazard as “the potential for harm, often associated with a condition or activity that, if left uncontrolled, can result in injury, illness or damage to property or the environment”, and *American National Standard for Occupational Safety and Health Management Systems, ANSI/AIHA Z10-2019*, that defines a hazard as “a condition, set of circumstances, or inherent property that can cause injury, illness or death”.

826 a person. Examples include shift work, long hours, unrealistic deadlines for work completion,  
827 and include individual stressors that supervisors are trained to address using existing NIST  
828 policies, that include, *e.g.*, anti-harassment program, reasonable accommodation program.

829

830 u. Relative Hazard Index (RHI) – A measure of the risk of a hazardous event or exposure based  
831 on a combination of the severity of the consequences of the hazardous event or exposure to a  
832 hazard and its likelihood.

833

834 v. Risk – An estimate of the combination of the likelihood of an occurrence of a hazardous  
835 event or exposure and the severity of injury or illness that can be caused by the event or  
836 exposure (from NIST O 7101.00); also includes facility/property damage and environmental  
837 impacts.

838

839 w. Risk Assessment – Process of evaluating the risks arising from hazards, considering the  
840 adequacy of any existing controls (from NIST O 7101.00).

841

842 x. Scope Creep – The gradual and unchecked expansion of a work's scope without adequate  
843 planning or review. It may result in significant changes and additional unmitigated risks.

844

845 y. Severity – A qualitative estimate of the consequences of the worst credible hazardous event  
846 or exposure associated with an identified hazard, *e.g.*, due to design inadequacies; procedural  
847 deficiencies; human error; environmental conditions; or system, subsystem, or component  
848 failure or malfunction.

849

850 z. Supervision – Oversight of the staff member by someone who understands the work,  
851 associated hazards, and required controls, and who is physically present in the work location  
852 while the work is being conducted or available for consultation within a reasonable amount  
853 of time commensurate with level of oversight needed, based on the proficiency of the staff  
854 member.

855

856 aa. Work – An experiment, operation, process, or job, often comprising activities, conducted to  
857 achieve a specific outcome.

858

859 bb. Worst Credible Hazardous Event – Most severe or serious event that is realistic, believable,  
860 considering the context of work and other relevant considerations.

861

862

## 863 **8. ACRONYMS**

864 a. CFR – Code of Federal Regulations

865

- 866 b. ESO – Emergency Services Office  
867  
868 c. JHA – Job Hazard Analysis  
869  
870 d. OFPM – Office of Facilities and Property Management  
871  
872 e. OSHE – Office of Safety, Health, and Environment  
873  
874 f. OU – Organizational Unit  
875  
876 g. PPE – Personal Protective Equipment  
877  
878 h. RHI – Relative Hazard Index  
879  
880 i. SMS – Safety Management System  
881  
882

883 **9. ROLES AND RESPONSIBILITIES**

- 884 a. OU Directors are responsible for:

- 885  
886 (1) Ensuring written OU procedures are developed, maintained, and implemented to clarify  
887 OU roles and responsibilities necessary to execute the requirements of this suborder  
888 within their respective OUs;  
889  
890 (2) Approving or disapproving hazard reviews according to requirements in Section 6.c; and  
891  
892 (3) Ensuring regular assessments and observations of active hazard reviews are performed to  
893 assess compliance with this suborder and OU procedure(s) associate with this suborder.  
894

- 895 b. Line Management is responsible for:

- 896  
897 (1) Ensuring hazard reviews are conducted, reviewed, approved, and concurred (as  
898 appropriate) for all new work and are re-reviewed regularly thereafter according to  
899 requirements in Section 6, including ensuring that work has been observed to ensure  
900 planned controls are in place and adequate;  
901  
902 (2) Ensuring inclusion of technical and safety subject-matter experts, obtaining services of  
903 external experts as warranted, to conduct hazard identification and recommend controls  
904 based on the hierarchy of controls;  
905

- 906 (3) Ensuring participation of OSHE Subject Matter Experts for reviews of work as specified  
907 in Appendix B;  
908
- 909 (4) Ensuring staff who perform the work activity participate in the conduct of hazard  
910 reviews, as feasible and appropriate;  
911
- 912 (5) Authorizing staff in accordance with the requirements of Section 6.d, ensuring staff are  
913 competent, *i.e.*, have the appropriate knowledge, skills, and abilities to perform work  
914 safely and have completed required training prior to conduct of work;  
915
- 916 (6) Ensuring subordinate line managers are competent, *i.e.*, they have appropriate  
917 knowledge, skills, and abilities to authorize staff to perform work and subsequently  
918 oversee the work being performed;  
919
- 920 (7) Being vigilant for “scope creep” while engaging in actions such as visiting work  
921 locations, participating in inspections, discussing work, or conducting management  
922 observations, and if scope creep is identified, shall require staff to stop work, revise the  
923 hazard review, and ensure re-review and re-approval of the hazard review and re-  
924 authorization of staff, according to requirements of this suborder;  
925
- 926 (8) Ensuring staff are appropriately supervised when work initially begins and thereafter is  
927 sufficient to help ensure safe work practices, including implementing required controls;  
928 and  
929
- 930 (9) Maintaining records in accordance with the requirements of Section 6.j.  
931
- 932 c. Activity Leaders are responsible for:  
933
- 934 (1) Managing the hazard review process; and  
935
- 936 (2) Ensuring all elements of the process are clearly and completely documented.  
937
- 938 d. Development Teams and Review Teams are responsible for:  
939
- 940 (1) Completing required training (initial and refresher) provided by OSHE on this suborder  
941 which includes training on how to conduct a hazard review;  
942
- 943 (2) Collectively as a team, having the requisite technical and safety knowledge, skills, and  
944 abilities to review the work being assessed;  
945

- 946 (3) Participating in reviews of hazard reviews according to requirements of this suborder;  
947  
948 (4) Informing line management when technical expertise is not available within NIST and  
949 helping to ensure adequate expertise is obtained elsewhere; and  
950  
951 (5) Consulting with OSHE as necessary to obtain adequate safety expertise.  
952  
953 e. OSHE Program Managers and Subject Matter Experts are responsible for:  
954  
955 (1) Participating in hazard reviews according to requirements of this suborder, based on areas  
956 of expertise;  
957  
958 (2) Working with Activity Leads, Development Teams and Review Teams when required or  
959 upon request, to help identify hazards, recommend controls to effectively mitigate  
960 hazards based on use of the hierarchy of controls, and assess residual risk; and  
961  
962 (3) Exercising judgement to provide or withhold concurrence on behalf of OSHE as part of  
963 the approval process for hazard reviews.  
964  
965 f. Authorized Staff Members are responsible for:  
966  
967 (1) Participating in the development of hazard reviews, as necessary and upon request;  
968  
969 (2) Completing all required training prior to working;  
970  
971 (3) Working within the boundary conditions of the hazard review and in accordance with  
972 required controls and training at all times;  
973  
974 (4) When necessary or desirable to work outside the boundaries/conditions of an approved  
975 hazard review or to change existing controls, requesting the change by submitting a  
976 revised hazard review for line management review in accordance with the requirements  
977 of this suborder; and  
978  
979 (5) Stopping work if any of the controls or emergency response equipment is not functioning  
980 properly, if scope creep has occurred, or if previously unrecognized hazards are  
981 identified.  
982  
983  
984  
985

- 986 g. OU and Division Full-time or Collateral Duty Safety Representatives are responsible for:  
987  
988 (1) Participating in the hazard review process according to requirements of this suborder and  
989 the OU procedure(s);  
990  
991 (2) Providing recommendations on hazard review documentation, including adequacy of  
992 procedures, hazard identification, specified controls, and risk assessments to OU and  
993 Division line management; and  
994  
995 (3) Participating in work observations upon request of line management.  
996  
997 h. The Chief Safety Officer is responsible for:  
998  
999 (1) Maintaining this suborder;  
1000  
1001 (2) Ensuring review of written OU-level procedures for meeting the requirements of this  
1002 suborder and provide the results of those reviews to the respective OU Directors; and  
1003  
1004 (3) Ensuring adequate OSHE staffing levels and expertise to support OU implementation of  
1005 this suborder.  
1006  
1007 i. The OSHE Program Manager for this Suborder is responsible for:  
1008  
1009 (1) Evaluating the effectiveness of this program with respect to efficacy of controls,  
1010 associated safety programs, and implementation of applicable regulatory requirements;  
1011  
1012 (a) Performing regular audits of active hazard reviews to assess compliance with this  
1013 suborder and OU procedure(s);  
1014  
1015 (2) Making determinations that hazards are controlled to recognized industry standards,  
1016 where applicable;  
1017  
1018 (3) Developing and maintaining any necessary deployment tools, including forms,  
1019 instructions, IT applications, training, and user guides;  
1020  
1021 (4) Serving as the primary point of contact and subject matter expert<sup>21</sup> on applicable:  
1022  
1023 (a) Federal, State, and local regulatory requirements and guidelines; and

---

<sup>21</sup> The Hazard Review Program Manager will serve as the Primary Point of Contact. However, they will draw upon and utilize the expertise of others for specific regulations, hazards, and subjects as warranted.

1024 (b) Consensus industry standards and best practices; and

1025

1026 (c) Interpretation of this requirements of this directive.

1027

1028 (5) Ensuring effective communication with affected line management and staff on program-  
1029 related issues.

1030

1031

1032 **10. AUTHORITIES**

1033 For authorities applicable to all NIST Occupational Safety and Health suborders, see NIST O  
1034 7101.00. There are no authorities specific to this suborder alone.

1035

1036

1037 **11. DIRECTIVE OWNER**

1038 Chief Safety Officer

1039

1040

1041 **12. APPENDICES**

1042 Appendix A. Revision History

1043

1044 Appendix B. Work, Hazards, and Controls that Require OSHE Participation on Development  
1045 and Review Teams

1046

1047 Appendix C. Hierarchy of Controls

1048

1049 Appendix D. Risk Assessment and Relative Hazard Index (RHI) Matrix

1050  
1051

**Appendix A. Revision History**

Revision	Document Approval	Effective Date	Description of Change
1	01/23/15	01/23/15	Modifications made to Section 3. Applicability, subsequent to Executive Safety Committee review.
2	11/07/17	11/07/17	Modified Section 6 to make more explicit the need for workers to understand the requirements of hazard reviews and the need to stay within scope or request re-review. Modified Section 9 to reflect the responsibilities necessary to fulfil the modified requirements in Section 6.
3	05/05/2020	05/05/2020	<ul style="list-style-type: none"> <li>• Modified Section 2.b to include abnormal conditions.</li> <li>• Modified Section 3.b to include applicability of abnormal conditions.</li> <li>• Modified Section 6g(1)(c) to include abnormal conditions</li> </ul>
4	12/23/2020	12/23/2020	Updated links under References and Applicable Suborders.
5	01/22/2025	04/01/2026	Extensive modifications including reorganization of the suborder to improve clarity and specificity. New requirements for OSHE, OU, Division safety representatives and worker participation, and requiring activity observation and consideration of psychosocial hazards and controls as part of worker approval.
6	01/xx/2026	02/18/2026	<ul style="list-style-type: none"> <li>• Modification of Section 6.c to include the upper-level management concurrence step.</li> <li>• Modification of other Sections to support the upper-level management concurrence step.</li> <li>• Additional minor edits to the document that did not affect requirements or roles/responsibilities.</li> </ul>

1052  
1053

**Appendix B. Work, Hazards and Controls that Require OSHE Participation on  
Development and Review Teams**

1054  
1055  
1056

Hazard reviews shall include safety subject matter experts from OSHE for work involving any of the following:

1059

1060

i. RHI = 3

1061

ii. RHI = 2 with hazard severity of “Catastrophic” or “Severe”

1062

iii. Exposures to substances specified in NIST S 7101.29 (*e.g.*, asbestos, bloodborne pathogens, beryllium, cadmium, lead, mercury)

1063

1064

iv. Particularly hazardous substances listed in NIST 7101.60

1065

v. Biological Safety Level 2

1066

vi. Work at elevations  $\geq 4$  feet (or  $\geq 6$  feet for construction) above another level that do not have passive fall protection<sup>22</sup>.

1067

vii. Scaffolding

1068

viii. Cranes

1069

ix. Permit required confined spaces

1070

x. Powered industrial trucks, scissor lifts or boom lifts

1071

xi. Aerosolized nanoparticles

1072

xii. Exposure to high voltage ( $\geq 600$  volts)

1073

xiii. Use of unlisted/uncertified or modified electrical equipment<sup>23</sup>

1074

xiv. Required use of respiratory protection

1075

xv. Required use of hearing protection

1076

xvi. Equipment that requires machine guarding

1077

xvii. A requirement for first aid kits beyond Class A.

1078

1079

The hazard review process shall include consultation with the relevant groups in OSHE, ESO, and OFPM (*e.g.*, Fire and Facilities Safety Group, Police Services Group, Fire Protection Group, Facilities Maintenance Division) when activity-specific alarms must be tied into building or facility alarm systems and when impairments are required.

1084

1085

NOTE: OSHE should be consulted when unique, atypical, or unusual work is proposed that may not be consistent with the proposed location or may require specialized facilities or equipment, and the results of the consultation should be noted in the hazard review. For example, OSHE should be consulted when work involves unusual quantities or classes of

1086

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1088

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<sup>22</sup> Typically, guardrails, parapets, railing, *etc.* Passive systems do not necessitate the use of personal protection equipment or active worker engagement.

<sup>23</sup> 29 CFR 1910.303(a) and 29 CFR 1910.399 include a general mandate that all electrical equipment be accepted, or certified, or listed, or labeled, or otherwise determined to be safe by a nationally recognized testing laboratory or subjected to a complete and thorough evaluation before use. See NIST S 7101.64.

1089 hazardous materials or requires specialized fire and life-safety systems or emergency-  
1090 response equipment.  
1091

## Appendix C: Hierarchy of Controls

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The hazard control selection process shall employ the following control categories, listed in the order of preference and efficacy, or in the following hierarchy:

- a. Elimination. Elimination refers to removing the hazard entirely. This is the preferred control but is not always practical or possible.
- b. Substitution. Substitution refers to use of safer, less hazardous methods, tools, equipment, or materials to perform the work<sup>24</sup>.
- c. Engineering controls. Engineering controls are typically effective by design, and with little or no user interaction. These include automatic shutoffs, interlocks, glove boxes, fume hoods, gas cabinets, blast walls.
- d. Administrative controls. Administrative controls require workers to implement processes, obtain specific knowledge, skills, or abilities, or abide by restrictions. These include use of procedures, supervision, the “buddy system”, signage, warnings, alarms, restrictions on the conduct of work (*e.g.*, based on time of day, lone worker and out-of-hours provisions, environmental conditions) and training<sup>25</sup> required to conduct the work safely (*e.g.*, training on equipment, use of controls, Safety Data Sheets, hands-on training to perform work).
- e. Personal protective equipment (PPE)<sup>26</sup>. Use of PPE is often an essential component of a layered approach but is considered the least effective because PPE requires proper use to be fully effective, providing only barrier between the user and the hazard.

Note that a combination of controls or layered approach is often necessary to achieve adequate hazard mitigation.

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<sup>24</sup> Examples include use of scissor lifts in place of ladders, a less toxic solvent in place of a carcinogen like benzene.

<sup>25</sup> Training on NIST suborders that apply more broadly, *e.g.*, Hazard Communication, Chemical Management, Hazard Signage, and that are not activity-specific are required to be completed by affected workers, but do not have to be specified in the hazard review documentation.

<sup>26</sup> The approved hazard review serves as the Certification of Hazard Assessment required by 29 CFR 1910.132, Personal Protective Equipment.

## Appendix D: Risk Assessment and Relative Hazard Index (RHI) Matrix

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### Assessing Potential Severity.

Each hazard shall be assessed for the degree of potential harm resulting from the worst credible hazardous event or exposure that could occur under realistic work conditions or foreseeable off-normal conditions due to design inadequacies, procedural deficiencies, human error, environmental conditions, or system, subsystem, or component failure or malfunction. The severity categories that shall be used are:

- i. Catastrophic: Death or permanent (total) disability; system or facility loss; major property damage, lasting environmental or public-health impact.
- ii. Severe (or Critical): Serious injury; temporary disability; subsystem loss or significant facility/property damage, temporary environmental or public-health impact.
- iii. Moderate (or Marginal): Medical treatment beyond first aid<sup>27</sup>; injury with lost workday; more than slight facility or property damage; external reporting requirements; more than routine clean-up.
- iv. Minor: First aid or minor medical treatment; no lost time, negligible or slight facility or property damage; no external (outside NIST) reporting requirements, routine cleanup.

The potential severity assessment should be based on objective information about the hazard and should consider inherent properties of the hazard source, the context of use, *e.g.*, process hazards<sup>28</sup>, boundary conditions or controls that limit amounts or concentrations of substances, temperatures, and fail-safe, built-in, engineering controls that limit the potential severity of exposure.

### Estimating Likelihood.

The likelihood of the potential harm, per instance of activity, shall be estimated based on knowledge of the hazard, experience, and where available and practical, evaluation of historical safety data from work with similar hazards. This process is subjective and relies on the judgment

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<sup>27</sup> First aid refers to medical attention that is usually administered immediately after the injury occurs and at the location where it occurred. It often consists of a one-time, short-term treatment and requires little technology or training to administer. First aid can include cleaning minor cuts, scrapes, or scratches; treating a minor burn; applying bandages and dressings; the use of non-prescription medicine; draining blisters; removing debris from the eyes; massage; and drinking fluids to relieve heat stress.

<sup>28</sup> For example, water is not classified as an explosion hazard based on its material properties, however, at elevated temperatures and pressures, steam explosions are possible. Similarly, working with acids or bases at elevated temperatures can increase the process hazards.

1153 of knowledgeable staff taking into consideration the efficacy and robustness of the specified  
1154 controls<sup>29</sup>.

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1156 i. Frequent: Likely to occur repeatedly. Current controls will not prevent this risk.  
1157 Typically characterized by primary reliance on administrative and PPE controls.

1158

1159 ii. Probable: Likely to occur several times, *i.e.*, multiple times but not frequently. Typically  
1160 characterized by some reliance on engineering controls and primary reliance on  
1161 administrative and PPE controls.

1162

1163 iii. Occasional: Likely to occur at some time. Typically characterized by good reliance on  
1164 engineering controls, high to moderate reliance on human factors for use of engineering  
1165 controls, and fair degree of reliance on administrative or PPE controls.

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1167 iv. Remote: Possible, but not likely to occur. Specified controls are robust. Typically  
1168 characterized by primary reliance on engineering controls with demonstrated reliability  
1169 that are not easily defeated or overridden, where administrative and PPE controls may be  
1170 required to in addition to engineering controls.

1171

1172 NOTE: If engineering controls are not feasible, robust, and demonstrably effective,  
1173 administrative controls and PPE may reduce the likelihood to remote only with  
1174 meticulous implementation and routine verification.

1175

1176 v. Improbable: Very unlikely; may reasonably assume exposure will not happen. Strong  
1177 controls in place. Typically characterized by use of highly reliable engineering controls,  
1178 where administrative and PPE controls may be required in addition to engineering  
1179 controls.

1180

1181 NOTE: In general, a likelihood of “Improbable” should not be assigned to a hazard  
1182 for which mitigation relies solely only administrative controls, PPE, or both, except in  
1183 rare circumstances, where there is a very low probability of human-factors-related  
1184 error that could defeat controls, and administrative controls include oversight to  
1185 ensure implementation of controls.

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1187 Assigning RHI Values.

1188 The RHI value for each hazard shall be determined based on the intersection of the assessed  
1189 potential severity of the hazard and the estimated likelihood, based on the assumption that the  
1190 specified controls have been implemented. The relative hazard index matrix shown below shall

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<sup>29</sup> Assessment of the robustness of controls should take into consideration the frequency and duration of the activity.

1191 be used to provide a relative ranking of risk for each hazard. The overall activity shall be  
 1192 assigned an RHI value equal to the highest RHI hazard of the activity.

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1194 **Relative Hazard Index (RHI) Matrix**

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Severity⇒	Catastrophic: Death or permanent total disability; system or facility loss; major property damage, lasting environmental or public-health impact	Severe/Critical: Serious injury or temporary disability; subsystem loss or significant facility or property damage, temporary environmental or public-health impact	Moderate/Marginal: Medical treatment beyond first aid; injury with lost workday; more than slight facility or property damage; external reporting requirements; more than routine cleanup.	Minor: First aid or minor medical treatment; no lost time, negligible or slight facility or property damage; no external (outside NIST) reporting requirements, routine cleanup
Likelihood⇓				
Frequent: Likely to occur repeatedly	High RHI=4	High RHI=4	Serious RHI=3	Medium RHI=2
Probable: Likely to occur several times	High RHI=4	High RHI=4	Serious RHI=3	Medium RHI=2
Occasional: Likely to occur sometime	High RHI=4	Serious RHI=3	Medium RHI=2	Low RHI=1
Remote: Not likely to occur	Serious RHI=3	Medium RHI=2	Medium RHI=2	Low RHI=1
Improbable: very unlikely (may assume exposure will not happen)	Medium RHI=2	Low RHI=1	Low RHI=1	Low RHI=1

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1197 NOTE: The RHI determination represents a best estimate; this risk assessment process is  
 1198 not an exact science, but rather a means of ensuring that due consideration is given to use  
 1199 of effective controls based on risk presented.

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1202 **References:**

- 1203 • ANSI Z10-2019 Occupational Health and Safety Management Systems; and
- 1204 • ANSI Z10.100 Guidance and Implementation Manual for ANSI/ASSP Z10.0-2019  
 1205 Occupational Health and Safety Management Systems.

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