NIST National Institute of Standards and Technology • U.S. Department of Commerce

Management Observation Process

1. PURPOSE

The purpose of this suborder is to establish the requirements and associated responsibilities for a Management Observation Process (MOP) to help prevent workplace injuries, illnesses, and other incidents to improve safety of operations and the workplace.

2. BACKGROUND

The Management Observation Process (MOP) is an element of the NIST safety management system designed to promote safe operations and continual improvement by facilitating an ongoing and frequently occurring conversation about safety between staff and line management. The purpose of the MOP is to: (1) help prevent injuries, illnesses, and incidents by increasing dialogue with workers on creating a safe workplace; (2) observe workers' behaviors without threat of punishment; and (3) provide positive reinforcement of safe work practices and behavior. The MOP also provides an opportunity for managers to demonstrate commitment to safety by regularly engaging staff in conversations about safety and by supporting improvements to workplace safety.

3. APPLICABILITY

The provisions of this suborder apply to all OU Directors and subordinate managers at all NIST workplaces.

4. REFERENCES

a. Public Law 91-596, (Williams-Steiger) Occupational Safety and Health Act of 1970;

b. Executive Order 12196, Occupational Safety and Health Programs for Federal Employees;

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[1] For revision history, see Appendix A.

38 c. 29 Code of Federal Regulations (C.F.R.) Part 1910, Occupational Safety and Health
39   Standards;
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41 d. 29 C.F.R. Part 1926, Safety and Health Regulations for Construction; and
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43 e. 29 C.F.R. Part 1960, Basic Program Elements for Federal Employee Occupational Safety and
44   Health Programs and Related Matters.
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47 **5. APPLICABLE NIST DIRECTIVES**
48 a. NIST O 7100.00: *Occupational Safety and Health Management System*; and
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50 b. NIST S 7101.20: *Work and Worker Authorization Based on Hazard Reviews*.
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53 **6. REQUIREMENTS**
54 a. All NIST managers shall participate in the OU's MOP program.
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56 b. Each OU shall develop a MOP program that specifies:
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58 (1) The frequency of annual MOP visits for each level of manager;
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60   (a) The following should be considered in determining the frequency of visits:
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62   i.   The nature of work conducted and, specifically, the hazards present;
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64   ii. Rate of change in the type of work, procedures used, materials used, people
65   performing work; and
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67   iii. Level of engagement required for managers to maintain an appropriate level
68   of knowledge concerning safe work practices, including hazard mitigation
69   strategies and controls used, and of safety improvement needs.
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71 (2) The plan for coverage with respect to locations, activities, and staff including supervisors;
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73   **Note:** Managers should strive to ensure that MOP interactions with all staff occur within
74   a reasonable timeframe. Priority should be given to more hazardous activities and
75   work locations.
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79   (3) The process for:

81   (a) Tracking to completion any recommended or required improvement(s) as well as any
82   corrective action(s) identified; and

84   (b) Communicating the results of those actions to MOP participants; and

86   (4) The requirement for line management accountability.

88 c. The MOP shall be conducted in a manner that:

90   (1) Promotes open discussion without fear of reprisal among staff and managers regarding
91   safety of operations and workspaces; and

93   (2) Leads to better understanding of the safety aspects of the specific work being conducted
94   and the workplace in which the work is conducted.

96 d. The MOP shall be performed in work locations where managers can observe and discuss
97   work practices and workplace conditions.

99   (1) In locations where the conduct of work is covered by an approved hazard review or JHA,
100   managers should:

102   (a) Ensure the hazardous work is covered by a hazard review or JHA; and

104   (b) Discuss the adequacy of the controls used to mitigate hazards.

106   (2) Where work is primarily office-based, managers should discuss implementation of office
107   safety and general safety requirements.

109 e. Managers shall work with staff to identify opportunities for improving workplace safety by
110   identifying preventive actions that focus on hazard reduction and risk mitigation and provide
111   support for these improvements.

113   (1) When a weakness or poor practice is observed, managers should recommend or require,
114   as appropriate, safety improvements without taking punitive measures.

116 f. Managers shall recognize and promote best safety practices and safe behaviors observed or
117   discussed during MOP visits by:

119   (1) Providing positive feedback to MOP participants; and

120   (2) Where appropriate, communicating support for the observed practices and behaviors
121   more widely (*e.g.*, at staff meetings, via emails, through newsletters).
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124 **7. DEFINITIONS**
125 There are no definitions specific to this suborder. Please see NIST O 7100.00 for other
126 definitions.
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129 **8. ACRONYMS**
130   a. MOP – Management Observation Process
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133 **9. ROLES AND RESPONSIBILITES**
134 a. OU Directors:
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136   (1) Ensure MOP is implemented within their OU.
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138   (2) Ensure line managers are accountable for implementing MOP in their areas.
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140 b. Line management:
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142   (1) Implements MOP according to OU requirements.
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144 c. NIST employees and covered associates:
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146   (1) Actively participate in MOPs conducted in their workspaces.
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149 **10. AUTHORITIES**
150 None required
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153 **11. DIRECTIVE OWNER**
154 Chief Safety Officer
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157 **12. APPENDICES**
158 A. Appendix A. Revision History
159 B. Examples of Implementation
160
161

162   Appendix A. Revision History

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Revision No.	Approval Date	Effective Date	Brief Description of Change; Rationale
0	08/08/19	04/01/20	Revision of NIST Administrative Manual Subchapter 12.07

164

165 APPENDIX B. EXAMPLES OF IMPLEMENTATION OF MANAGEMENT OBSERVATION
166 PROCESSES.
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168 There can be substantial variation in how each OU implements the MOP in its organization.
169 One model is that used by Oak Ridge National Laboratory. Four observations are conducted
170 quarterly by the organization directors, typically lasting about one hour (a half hour is more
171 typical of an office operation). The managers focus on the work and ongoing processes during
172 the conversation. No notes are taken during the conversation to emphasize the listening
173 process. Summaries of the MOP (typically 100 to 200 words) are written after the conversation
174 and entered into a database. The information gathered should reflect the quality and depth of
175 the conversation.
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177 Examples of safety-related discussion points include the following:
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179 ▪ Personal safety expectations and how they relate to the work being performed;
180 ▪ How well workers understand hazards of their work and controls necessary to work safely;
181 ▪ The most common injuries and what the workers can do to prevent them;
182 ▪ Suggestions that the workers have to improve safe operations in their work environment;
183 ▪ The need for additional management support to resolve a safety concern;
184 ▪ The comfort level of workers to report minor safety incidents and near-accidents;
185 ▪ The process that workers can use to resolve safety issues.
186
187 A second model for opening lines of communication with the staff on issues like safe research
188 operations and safe behaviors in the workplace, is through a regular, unforced, on-going
189 dialogue. A popular and effective tool that line managers frequently use is management-by-
190 walking-around (MBWA). The characteristics of MBWA are personal involvement and good
191 listening skills. This activity typically involves each line manager setting aside enough time each
192 day to engage staff and subordinate managers in a dialogue involving many different topics
193 including—but not limited to—questions about their particular work, their work environment,
194 security, safety, even updating them on current NIST news & events, and any other staff
195 concerns. This is also an excellent opportunity for making positive comments and getting
196 feedback.
197
198 This model is easily adaptable to meet the NIST requirements. In this case, the MOP involves all
199 line managers in the OU. Documentation of follow-on actions is required where specific
200 corrective actions are necessary and formal documentation is warranted to ensure that the
201 corrective measures are executed. Each line manager is accountable for active participation in the
202 MOP, and this accountability is reflected in the performance plan. OU Directors, OU
203 Deputies, Division Chiefs, Group Leaders, and Team/Project Leaders cover the entire work
204 environment, engaging the staff in each setting in active discussions regarding work-related
205 topics including safe research operations and work behaviors. This does not mean that any one
206 line manager is required to cover all of this space or engage all staff. As a rule of thumb, the
207 collective line management team should cover all work areas at a frequency commensurate
208 with the level of hazards and changing conditions, which could translate to a frequency as often
209 as weekly.