UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
2850 YOUNGFIELD STREET
LAKEWOOD, COLORADO 80215-7093

June 10, 2003

In Reply Refer To:
1112, 1703 (CO-951) **P**

EMS Transmission 06/10/2003
Instruction Memorandum No. CO-2003-025
Expires: 09/30/2003

To: Center and Field Office Managers

From: State Director

Subject: Facility Compliance Management and Tracking of Compliance Assessment – Safety, Health, and the Environment (CASHE) Findings (DD: July 11, 2003)

The purpose of this memo is to request your updated CASHE information, as directed by the Washington Office Instruction Memorandum No. 2003-167, dated 5/12/03. Attached is the WO IM, a findings spreadsheet, and the instructions for updating the spreadsheet for 2003. The findings spreadsheets are contained on a CD disk. John DeVore, the State Safety Officer, has separated the CD data by office and emailed you that information .

Your updated CASHE data should be returned to John DeVore by July 11, 2003. John will prepare a consolidated response to the Washington Office in accordance with Instruction Memo. No. 2003-167. Please pay close attention and follow the instructions given in that memo.

If you have questions, John can be reached at 303.239.3650.

Signed by
Douglas M. Koza
Acting State Director

Authenticated by
Don Snow
EMS Operator

Attachment

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

May 12, 2003

In Reply Refer To:
1112, 1703 (360) P
Ref. IM No. 2002-211

EMS TRANSMISSION 05/14/2003
Instruction Memorandum No. 2003-167
Expires: 09/30/2004

To: All Field Officials

From: Assistant Director, Minerals, Realty, and Resource Protection

Subject: Facility Compliance Management and Tracking of CASHE Findings

DD: 07/31/2003

Program Areas: Facility Compliance and Safety.

Purpose: This Instruction Memorandum (IM) asks the Field to provide an update on the implementation status of recommendations or other corrective actions related to findings from Compliance Assessment - Safety, Health, and the Environment (CASHE) audits. This information will be used to identify projects for funding from deferred maintenance money designated in Fiscal Year (FY) 2004 for CASHE corrective actions. In addition, the Bureau of Land Management (BLM) will make use of this data to:

- manage and minimize risk related to facility compliance, and
- identify future funding, policy, and training needs.

Accurate information about facility compliance is necessary for BLM to achieve its strategic planning goal to "Improve Public Safety and Security and Protect Public Resources from Damage."

Background: In the FY 2002 Annual Performance Report for Long-term Goal 01.04.01, BLM reported that 66 percent of its organizational units were in good safety, health, and environmental condition. This value was based on information received in response to Washington Office IM No. 2002-211, which asked the Field to update the status of unresolved CASHE findings. For the FY 2003 Annual Performance Report, organizational units will be considered in good condition if they have two or less incomplete corrective actions related to high priority CASHE findings. This value will continue to be phased downward in subsequent Fiscal Years until it reaches zero in FY 2005.

The performance measurement data specification that defines high priority CASHE findings and describes how the data will be used is located at: http://web.wo.blm.gov/abc/pm/PM_Index.asp. The performance goal for FY 2003 is 68% of BLM organizational units be in good safety, health, and environmental condition.

Policy/Action: *Updating Status of CASHE Recommendations/Corrective Actions:* Organizational units (i.e., Washington Office, State and Field Offices, National Centers) that have had a CASHE audit between October 1993 and April 18, 2003 are asked to update the status of recommendations/corrective actions. This data is to be reported on the spreadsheet that was transmitted separately to every Field Office safety officer and HAZMAT coordinator by their State Office Safety Manager or HAZMAT Program Lead. A CD-ROM containing the spreadsheets to be updated will be sent to each State Office Safety Manager and HAZMAT Program Lead by May 30, 2003. Instructions for completing and returning the spreadsheets will accompany the CD-ROM. In addition, comments on the status of CASHE findings from draft CASHE reports for audits completed through June 27, 2003, will be incorporated into the status update database.

Implementation of CASHE Recommendations/Corrective Actions: Consistent with available budget resources and other programmatic concerns, organizational units are to implement CASHE recommendations/corrective actions and/or request funding for implementation within one year of the audit.

Timeframe: Please return the updated spreadsheets by July 31, 2003. Specific directions for returning the completed spreadsheets to the CASHE auditing contractor will accompany the CD-ROM. The due date for the status update is earlier than last year's because the Department is requiring that BLM provide its FY 2003 Annual Performance Report data earlier (i.e., by October 15, 2003).

Please note: Organizational units that do not respond by July 31, 2003 will:

- have their corrective actions shown as incomplete,
- negatively affect the FY 2003 performance for Long-term Goal 01.04.01, and
- be ineligible for deferred maintenance funding for CASHE corrective actions.

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Budget Impact: None.

Manual/Handbook Sections Affected: None

Coordination: National Safety Office (WO-740).

Contacts: Ken Morin, Protection and Response Group (WO-360), 303-236-6418; Bruce Prater, Occupational Safety and Health (WO-740), 202-501-2664.

Signed by:
John W. Broderick
Acting Assistant Director
Minerals

Authenticated by:
Barbara J. Brown
Policy & Records Group, WO-560

MEMORANDUM

To: BLM State Office HAZMAT Coordinators and Safety Managers

From: Bonnie Wisniewski, Aarcher, Inc.

Date: May 19, 2003

Re: CASHE Findings Status Update for 2003 - Instructions
Responses due by July 31, 2003

Aarcher, Inc. has been tasked to obtain the current status of all CASHE findings identified between October 1993 and April 18, 2003. Enclosed is a CD containing Microsoft Word documents of all open CASHE findings identified in your State during that timeframe. An electronic copy of these instructions and BLM Instructional Memorandum No. 2003-167 (see below) are also included on the CD. **Please provide this memo to the field with their findings.**

The documents only reflect findings that are not complete based on the last reported status. If a scheduled date of completion has passed, a finding is not considered complete until that fact is reported back to Aarcher. The last reported status was either provided in the final report, in draft report comments, or in response to the 2002 status update request, which ever is most recent. [**Note:** There is not necessarily a document for every audited facility because this effort only involves reporting on open findings (i.e., some facilities have completed all corrective actions related to past CASHE findings).]

The documents also include findings from recently conducted assessments for which Aarcher has not yet received comments (points of contact and status of corrective action). Please advise the field that if this is their circumstance, the response to this status update request can also serve as their comments on the draft report and Aarcher will incorporate them into the final CASHE report.

As you are aware, the FY 2001 BLM Annual Performance Plan, Long-term Goal 01.04.01, calls for increasing the percentage of BLM organizational units in "good safety, health, and environmental condition." The Government Performance and Results Act (GPRA) requires all Federal agencies to establish measurable and verifiable performance goals and to report on those goals annually. The results of the update will be tabulated by Aarcher, Inc. and used by the WO to report on Long-term Goal 01.04.01. Please refer to Instruction Memorandum No. 2003-167 dated May 12, 2003, or contact Ken Morin, BLM CASHE Program Lead, for additional information on how the updated CASHE finding data will be reported internally at BLM.

The findings are being sent to State Office HAZMAT Coordinators and Safety Managers, as opposed to directly to the field. This is to ensure that the appropriate Field/District Office personnel receive them and that all organizational units respond.

This request is for an update of the following information, where applicable:

1) The status of each finding (see the preferred format for the status information in the definitions below);
2) The point(s) of contact (full names of BLM individuals, not a program, committee, office, or building owner); and
3) Facility name changes.

Each Word document represents a section of a CASHE report and has been assigned a file name representing such. For example, a CASHE report for a Field Office in Colorado may have had three sections: Blue Field Office, Blue Field Office Recreation Sites, and Blue Field Office Fire Facilities. The associated files for the findings in these sections are named *CO BlueFO.doc*, *CO BlueRec.doc*, and *CO BlueFire.doc*.

[**Note:** Copying a document to CD usually results in the document being formatted as "Read Only." This designation does not allow the electronic file to be modified. Once the files are copied to ones computer, open the document properties and remove the check mark for "Read Only."]

For those who respond electronically, **it is imperative that the files are not renamed or converted to a different software**, as file integrity is critical to Aarcher's ability to track the data. Electronic modification, software conversion, and renamed files result in lost data. Modified files will be rejected and the State Office HAZMAT Coordinators and Safety Managers will be contacted in an effort to obtain the data in the correct format. If the field prefers not to respond electronically, they should print the documents, update them by hand, and mail them to Aarcher.

The following is a list of the data fields provided for the findings and definitions of the information contained in them.

Header Information - The organizational unit and assessed facility(s) (i.e., report section).

Finding Number - The unique code assigned to the finding (Protocol Abbreviation - Assessment Year - Sequential Number).

Finding - The identified compliance deficiency.

Date of Final Report - The date the of the final CASHE report where the finding was documented. For findings that have not yet been provided in a final report, this field is blank.

Facilities that have had a follow-up CASHE will have sets of findings sorted by final report date. [**Note:** It is important for facilities to comment on both sets of findings because every finding identified in a baseline report is not necessarily repeated in the follow-up. This is based on a number of factors, including changes in the CASHE approach/priorities, that the same facilities are not always inspected on the follow-up, regulations have changed, etc. In addition, a baseline finding may not have been identified in the follow-up; however, a point of contact is still relevant.]

Repeat? - An indication (Yes or No) of whether the finding is a repeat from the baseline CASHE. For facilities that have not had a baseline CASHE, "N/A" has been entered.

Priority Level - The class of finding (IA, IB, IC, II, III) based on the level of violation. All findings identified prior to February 2001 were assigned Priority Levels. After February 2001, Priority Levels were no longer assigned to safety findings; therefore, for safety findings identified after February 2001, "N/A" has been entered in this field.

Safety RAC - The Risk Assessment Code (RAC) assigned to safety findings based on BLM Manual Handbook 1112-I, Safety and Health Management. The CASHE Program began assigning Safety RACs in February 2001. For findings identified prior to that, "N/A" has been entered. For environmental and transportation findings identified after February 2001, "N/A" has been entered in this field.

Recommendation - Corrective actions suggested by the CASHE Team based on the specific conditions at the facility, costs, and regulatory requirements.

Point(s) of Contact - The name of the BLM personnel who are acting as point of contact (POC) for the corrective action as provided in the final report, draft report comments, or in response to the 2003 status update request, which ever is most recent. Where information was not provided to the status update last year or it has not yet been received on a draft report, "Not provided" has been entered. **The field is requested to update this field with the full name(s) of current POCs (e.g., not a program, committee, or office).** If names are not provided, "Unassigned" will be entered.

Last Reported Status - The status of the corrective action as provided in the final report, draft report comments, or in response to the 2003 status update request, which ever is most recent. When no information was provided to the status update last year or it has not yet been received on a draft report, "Not provided" has been entered.

Current Status - This field has been left blank for facilities to provide updated status information. Facilities are requested to provide the current status information in a format similar to the examples below.

- Unscheduled
- Completed in [date if available]
- Implemented in [date if available]
- Scheduled for completion by [date]
- Funding requested; anticipate completion by [scheduled date of completion]
- Preliminary planning; anticipate completion by [scheduled date of completion]
- Under design; anticipate completion by [scheduled date of completion]
- Under construction; anticipate completion by [scheduled date of completion]
- N/A (e.g., if no longer relevant because a facility no longer exists). [**Note:** If a finding is no longer relevant, please explain why.]

[Note: Findings are not considered complete unless completion is explicitly stated in the response.]

Please provide the findings and these instructions to relevant facility personnel (Field Office Managers, HAZMAT Coordinators, Safety Officers). Please request that respondents coordinate their update with others to ensure no findings are skipped, as many findings overlap program areas; and that **all responses be consolidated on one document returned to Aarcher**. Responses that are not consolidated; or that are incomplete, illegible, or not in the requested format will be rejected and the State Office HAZMAT Coordinators and Safety Managers will be contacted to assist in obtaining the data in the correct format. This approach is in accordance with Aarcher's guidance from Ken Morin, BLM CASHE Program Lead.

Responses must be returned to Aarcher no later than **July 31, 2003**. Responses may be emailed or mailed to the following **(no faxes, please)**:

AARCHER, INC.
ATTN: Bonnie Wisniewski
14 Inverness Drive East
Suite A-232
Englewood, CO 80112
303-662-1696
bwisniewski@aarcherinc.com

If you have any questions, please do not hesitate to call me at 303-662-1696. Thank you for your assistance.