



# NASA Procedural Requirements

**COMPLIANCE IS MANDATORY**

**NPR 1800.1C**

Effective Date: October 06,  
2009

Expiration Date: December  
06, 2015

[Printable Format \(PDF\)](#)

Request Notification of Change (NASA Only)

## **Subject: NASA Occupational Health Program Procedures w/Change 2 (05/17/2013)**

**Responsible Office: Office of the Chief Health & Medical Officer**

[| TOC](#) | [ChangeLog](#) | [Preface](#) | [Chapter1](#) | [Chapter2](#) | [Chapter3](#) | [Chapter4](#) | [Chapter5](#) | [Chapter6](#)  
[| Chapter7](#) | [AppendixA](#) | [AppendixB](#) | [AppendixC](#) | [AppendixD](#) | [AppendixE](#) | [AppendixF](#) | [ALL](#) |

## **Chapter 1. Policy**

### **1.1 Designated Agency Safety and Health Official**

1.1.1 The Chief Health and Medical Officer (CHMO) serves as the Designated Agency Safety and Health Officer (DASHO) liaison to the Department of Labor (DoL), as required by Executive Order 12196.

1.1.2 All official, Agency-related communication with Occupational Health and Safety Administration (OSHA) shall be through the DASHO. The DASHO shall be copied on, or otherwise informed of, all Center communication with OSHA.

1.1.3 In addition, the Office of Safety and Mission Assurance shall be copied on all correspondence to help ensure configuration management of policy and processes for safety.

### **1.2 Medical Waiver Authority**

1.2.1 The CHMO shall serve as the Agency Health and Medical Technical Authority (HMTA) for all health and medical technical requirements, standards, and matters, possessing the final waiver authority for any NASA health and medical requirement.

1.2.2 The CHMO delegates authority to each NASA Center's Chief Medical Officer/Medical Director (where appropriate).

1.2.3 The CHMO shall be responsible for ensuring the health and safety of NASA employees in space and on the ground by developing medical policy, establishing guidelines for health and medical practice in the Agency, providing oversight of health care delivery, assuring professional competency Agency wide, and reviewing and approving research requirements and deliverables.

1.2.4 Center Chief Medical Officers/Medical Directors (where appropriate) in collaboration with the NASA Center's occupational health Contracting Officer Technical Representative (COTR) shall be responsible for:

- a. Ensuring appropriate credentials reviews of all health care providers stipulated in all statements of work for contracts procuring occupational health services.
- b. Notifying the Agency CHMO of cases of impaired providers and actions taken as they occur.

### **1.3 Required Annual Reports**

#### **1.3.1 OSHA Report**

1.3.1.1 NASA shall submit an annual report to the Secretary of Labor containing the status of NASA's Occupational Health Program (OHP) during the preceding year, goals and objectives for the current year, and a plan for achieving those goals. The procedure for collecting the requisite data shall be as follows:

- a. NASA OHP shall forward the format to the Centers each year as soon as it is received from OSHA/DoL.
- b. NASA installations shall complete the form and return it to Office of the Chief Health and Medical Officer (OCHMO) by the designated deadline.
- c. The report shall be jointly prepared by the Office of Safety and Mission Assurance and the OCHMO, signed by the DASHO, and submitted to OSHA by the January deadline.

#### 1.3.2 Cost and Staffing Report

1.3.2.1 A Cost and Staffing Report shall be compiled annually as part of the OCHMO internal budget process to support funding for the NASA OHP. Each Center shall submit to OCHMO the following data:

- a. The number of staff, civil service or contractor, and the man-hours utilized for each professional discipline reported.
- b. Data shall include both occupational medicine and environmental health staffing.

#### 1.3.3 Employee Assistance Program (EAP) Report

1.3.3.1 Center EAP clinicians in conjunction with their occupational health COTR shall submit EAP statistics to the Agency EAP manager quarterly or as requested. EAP statistics shall, at a minimum, include the Center, number and types of EAP cases, referral source, primary presenting issue, and assessment/final disposition.

1.3.3.2 Data shall be collected electronically whenever possible.

#### 1.3.4 Drug-Free Workplace Program

1.3.4.1 The overall responsibility for NASA's Drug-Free Workplace Program (DFWP) lies with the Office of Human Capital Management (OHCM). The OCHMO shall support this program by developing, administering, and evaluating the Agency-wide Medical Review Officer (MRO) function as it relates to drug testing, as well as by mandatory referrals to the EAP when positive test results are noted.

1.3.4.2 The Center MRO is usually the Center Medical Director. The MRO shall receive test results directly from the certifying drug test laboratory, confirm positive test results, and review as needed with the Agency MRO, who is appointed by the CHMO, prior to notifying the Center. The validity of positive and negative test results shall be confirmed administratively. When the Center MRO is someone other than the Center Medical Director, the Agency MRO shall approve the person's credentials.

## 1.4 Credentialing, Education, and Training of Occupational Health Professionals

### 1.4.1 Policy

1.4.1.1 All Occupational Health (OH) professional disciplines (Occupational Medicine (OM), Environmental Health (EH), Employee Assistance Program (EAP), Workers' Compensation (WC), Fitness, etc.) shall maintain all appropriate credentials and licenses and remain current in their respective fields.

### 1.4.2 Responsibilities

1.4.2.1 The CHMO shall provide oversight in the area of credentialing, education, and training of OH professionals and shall assess compliance with this policy.

1.4.2.2 The CHMO shall maintain minimum credentialing, education, and training requirements for each primary OH discipline.

1.4.2.3 The CHMO shall work with the NASA Centers to determine the most appropriate education and training opportunities. CHMO shall provide accessible professional development training opportunities and resources on a routine basis to include training courses, video conferences, meetings, Web-based training, and other educational opportunities. CHMO shall actively promote appropriate professional certifications in all disciplines by emphasizing certification, procuring resources to prepare for certification, and by recognizing certified personnel.

1.4.2.4 Centers shall establish and maintain effective organizations to fulfill OH requirements using professionally qualified persons and allocating sufficient resources for the OH program. NASA Centers shall ensure all current professional licensures, certifications, and accreditations necessary for professional operations are maintained. Maintaining required licensure and certification dictates certain continuing education requirements for OH professionals.

1.4.2.5 Center OH managers shall conduct assessments of professional and career development needs to determine the training required of their OH staff. These needs shall be communicated to Center management in an effort to secure adequate resources.

### 1.4.3 Process Description

1.4.3.1 NASA installation hiring policies shall comply with Federal and NASA requirements for professional education standards and, where applicable, with state licensure statutes.

1.4.3.2 NASA installations shall hire OH professionals with experience and credentials commensurate with program requirements and minimum standards as established by the OCHMO.

1.4.3.3 NASA Center OH managers shall design, implement, and maintain minimum education, training, and credentialing requirements for all OH program personnel, civil service personnel, or contractor commensurate with program requirements and minimum standards as established by OCHMO.

1.4.3.4 NASA Center OH managers shall ensure a process is in place for evaluating compliance with all OH program education, training, and credentialing requirements. This includes both civil service personnel and contractor personnel.

1.4.3.5 The Center OH managers shall encourage and support all Agency educational and training activities as budgets permit such as the annual OH Meeting, Safety Directors and Occupational Health Managers meeting, Video Teleconferencing System, and OCHMO sponsored training courses. This includes both civil service personnel and contractor personnel.

1.4.3.6 The OCHMO shall perform an annual training needs assessment of OH personnel at the Centers to determine what topical areas are needed most for the training of OH staff across NASA. The results of this assessment shall be used to develop an annual training plan.

1.4.3.7 The OCHMO shall arrange and provide a variety of training programs. All programs, when appropriate, shall have continuing education credit commensurate with the OH discipline receiving the training. These training programs include, but are not limited to, the following:

- a. Assuring availability of the most current and authoritative written reference materials.
- b. Providing ready access to intercenter and external consultants.
- c. Providing regular live and taped audio and video training that complies with Section 508.
- d. Planning an annual Occupational Health Meeting covering all OHP disciplines.
- e. Promoting intercenter and external events (courses, workshops, seminars) on essential topics by discipline experts.
- f. Conducting hands-on training in procedures and simulation exercises to refresh and augment skills where handling of actual events is infrequent.

1.4.3.8 Questions regarding training requirements shall be directed to the individual organization training coordinator or other entity responsible for providing training.

## **1.5 Web Site Initiatives and Capabilities**

### **1.5.1 Policy**

1.5.1.1 The NASA OH Web site ([ohp.nasa.gov](http://ohp.nasa.gov)) shall be the primary resource for quick dissemination of OH related information to OH personnel to assist OCHMO in communicating to NASA Centers and facilities.

### **1.5.2 Responsibilities**

1.5.2.1 The CHMO shall be responsible for maintaining the NASA OH Web site as a means of disseminating information and providing guidance to NASA Centers and Facilities on OH related topics and policies.

1.5.2.2 The OH Support Office shall be responsible for the design and management of the NASA OH Web site.

1.5.2.3 The CHMO, OCHMO, and OH Support Office discipline-specific subject matter experts are responsible for managing the technical content of the Web site.

### **1.5.2 Process Description**

1.5.3.1 The NASA OH Web site content shall be delivered in a reliable and responsive manner while meeting all of NASA's security, accessibility, and data privacy regulations.

1.5.3.2 The content of the OH Web site shall be designed by the appropriate discipline-specific experts to meet the needs of the NASA OH community.

1.5.3.3 The OH Web site shall be updated on a regular basis with current health news, OH discipline-related information, health promotion resources, and policies.

1.5.3.4 The OH Web site shall provide annual OH meeting information and registration for attendees.

1.5.3.5 The OH Web site shall maintain an archive of meetings, health promotion calendars, articles of interest, and OH Newsletters.

## **1.6 NASA Occupational Health Program Model Statements of Work**

### **1.6.1 Policy**

1.6.1.1 NASA Centers shall manage and organize OH programs via support service contracts according to Center's mission needs.

1.6.1.2 Center OH support contracts shall incorporate the service contract requirements for each OH discipline as required in the NASA OHP Standardized Statement of Work (SOW).

NOTE: This document is available on the policies page of the OH Web site [<http://www.ohp.nasa.gov>] for Center personnel who are preparing the requirements for OH support contracts at the Centers.

### **1.6.2 Responsibilities**

1.6.2.1 The CHMO shall periodically revise the NASA OHP SOW document and ensure that it is current with new regulations or significant issues within the OH professions and assess compliance with this policy.

1.6.2.2 The Centers shall be responsible for ensuring their OH service contracts incorporate the minimum service requirements listed in the SOW as they are applicable to their Center's OH program needs.

### **1.6.3 Process Description**

a. When a Center OH service contract is being prepared, the Center shall incorporate all applicable OH service requirements into the contract as identified in the NASA SOW.

b. When Center operations require deviations from the minimum OH requirements as stated in the SOW, they shall request a variance from OCHMO. Any variances must be submitted in writing to the Director of Occupational Health (DOH) for review and approval by the CHMO.

## **1.7 Support of Federal-wide and Interagency Initiatives**

### **1.7.1 Policy**

1.7.1.1 All NASA Centers shall adopt policies/programs in support of a healthy work environment as directed by OCHMO based on guidance from the Office of Personnel Management (OPM) pertaining to work/life issues.

### **1.7.2 Responsibilities**

1.7.2.1 The CHMO and OHCM shall be responsible for collaborating with and supporting the OPM agenda.

1.7.2.2 The CHMO shall provide guidance and technical support to the Center COTRs as they develop their Center specific health and work/life policies. The CHMO shall communicate all initiatives from the OPM that NASA is supporting.

1.7.2.3 The COTR and the Center Medical Director shall actively support all CHMO-directed health and productivity initiatives and ensure required metrics are collected and reported to CHMO.

1.7.2.4 The Health Promotion Workgroup (HPW) Team members shall coordinate all efforts at the Center level and complete an evaluation of the process at its closure.

### **1.7.3 Process Description**

1.7.3.1 In cooperation with the OHCM, the CHMO shall communicate all Agency-sanctioned work/life and health and productivity initiatives through the HPW Team.

1.7.3.2 The Center's HPW Team representative shall collaborate with the COTR and Medical Director to plan and effectively implement all Agency-directed initiatives.

1.7.3.3 The Center HPW Team representatives shall collect and analyze their metrics and report the required data points to the COTR and the Medical Director prior to reporting to the OCHMO.

## **1.8 Occupational Health Program Audit Overview**

### **1.8.1 Policy**

1.8.1.1 The audit process shall assess compliance with all applicable regulations and requirements at all NASA Centers and facilities for the following disciplines: OM, Industrial Hygiene (IH), Health Physics, Food Sanitation, Fitness, EAP and WC.

1.8.1.2 The audit team shall conduct on-site Center audits as per Chapter 7 of this NPR.

#### 1.8.2 Responsibilities

1.8.2.1 The CHMO shall assess the effectiveness of the Agency's OH programs at all NASA Centers and Facilities. To carry out this responsibility, it conducts periodic audits of NASA Center OH programs.

1.8.2.2 The CHMO shall perform audits as per the requirements specified in Chapter 7 of this document.

1.8.2.3 Center OH Managers shall be responsible for providing adequate provisions and resources in support of an Agency audit. This includes providing documents in a timely fashion, providing on-site office accommodations, being present for the on-site audit activities, and responding in a timely fashion to audit findings.

#### 1.8.3 Process Description

1.8.3.1 For a detailed description of the audit process, refer to Chapter 7 of this document.

[| TOC |](#) [ChangeLog |](#) [Preface |](#) [Chapter1 |](#) [Chapter2 |](#) [Chapter3 |](#) [Chapter4 |](#) [Chapter5 |](#)  
[Chapter6 |](#) [Chapter7 |](#) [AppendixA |](#) [AppendixB |](#) [AppendixC |](#) [AppendixD |](#) [AppendixE |](#)  
[AppendixF |](#) [ALL |](#)

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