



**Commonwealth of Massachusetts
Executive Office of Labor and Workforce Development
Department of Labor Standards**

EXECUTIVE ORDER #511

GAP ANALYSIS

**Deval L. Patrick, Governor
Timothy P. Murray, Lieutenant Governor**

Joanne F. Goldstein, Secretary

Heather Rowe, Director

**Hilary Hackbart, Environmental Engineer, EO 511
Project Lead**



Background

- ▶ Health and safety standards (such as OSHA standards) have not been formally set for state employees through central policy, state, or federal law.
- ▶ There is no formal enforcement mechanism for state worker health and safety, unlike in the private sector.
- ▶ There has been no comprehensive approach to state worker health and safety efforts at the central level.
- ▶ Before making improvements to the above, it is important to get a comprehensive understanding of where we stand and what is needed.



Purpose of the Gap Analysis

- ▶ To determine:
 - ▶ Where do agencies stand with the CAPACITY to implement and maintain worker protections?
 - ▶ Where do agencies stand relative to the national worker protection industry STANDARDS of PRACTICE, (e.g., to what extent are the specific worker protection procedures, equipment, training, etc. outlined in these standards being followed)?



Hazard Assessments and the Gap Analysis

- ▶ For the hazard assessment questionnaires, you identified what was currently in place for worker protections for each hazard in the areas of:
 1. Upper Management Support and Policy
 2. Accountability
 3. Use of a Technical Standard (such as the OSHA standard)
 4. Training
 5. Controls (e.g., specific safety equipment, safety procedures)



Hazard Assessments and the Gap Analysis

- ▶ For the gap analysis, you are comparing what is currently in place against two separate benchmarks:
 1. Health and safety management “ideals” (this helps us look at where we stand with the **capacity** to implement and manage worker protections)
 2. The OSHA standard or relevant national or state worker protection standard (this helps us look at where we are relative to the national **worker protection standards of practice**)



How Will This Information Be Used?

- ▶ To help the Advisory Committee shape the creation of centralized worker health and safety policies and supports for agencies.
- ▶ To help the Advisory Committee identify strategic and effective steps forward to create sustainable improvements in health and safety protections.
- ▶ To help create secretariat / agency health and safety management plans.
- ▶ As a start to the list of specific needed health and safety improvements for your agency.



The Basic Question

- ▶ Are employees fully protected from this hazard every single time?

- ▶ If the answer is no...
 - What is missing?

 - Why is it missing?



Where the Rubber Meets the Road

- ▶ What is **ACTUALLY HAPPENING**, day to day for worker protections? What is **REAL** in terms of actual worker protection?
 - If there is a health and safety policy for this hazard, do employees know about it? Has it translated into actual day-to-day use on the job?
 - If there are required procedures, are they being followed? Are they the right procedures to keep workers safe?
 - If there is equipment, is it being used? Is it in workable condition?



Conducting the Gap Analysis for Each Hazard

- ▶ Before starting any of the gap analysis work, read through the “Gap Analysis Guidance” document.

- ▶ To conduct the gap analysis for each specific hazard:
 1. Read through the “Health and Safety System Ideals” document (you will use this same document for all hazards).
 2. Read through the summary of standards and guidelines for that specific hazard (aka the “answers” docs, these have the filename: hazard_answers)
 3. Look over your completed hazard assessment for this hazard to review what is currently in place for this hazard.
 4. Identify any differences or “gaps” between what you have in place and what was presented for both the ideals and standards.
 5. This comparison will require new thinking and discussion within the committee.

- ▶ This is a big picture, thinking exercise. Do not get bogged down in “process” details doing the gap analysis. Focus on identifying what you see as missing for needed protections or management of this hazard by comparing what you have against the benchmarks.



Gap Analysis “Findings” Document

- ▶ This is the document you will use to record your gap analysis results, and what will be submitted.

- ▶ You will complete a separate document for each hazard.

- ▶ By asking questions, this document walks you through thinking about the gaps for each of the health and safety management system elements.
 1. Upper Management Support and Policy
 2. Accountability
 3. Use of a Technical Standard (such as the OSHA standard)
 4. Training
 5. Controls (e.g., specific safety equipment, safety procedures)



Gap Analysis “Findings” Document

- ▶ For each management system element, you will be asked the following:
 - Are there any gaps between what is in place and the “ideals”?
 - Are there any gaps between what is in place and the OSHA (or other) standards?
 - What are the reasons for the gaps?
 - Do you have ideas/suggestions for improvements?



Gap Analysis “Findings” Document

- ▶ In addition to looking at the gap analysis in terms of each of the health and safety management elements, you may want to pull it all together and give an optional general overview of where things stand for this hazard, and the importance of this hazard for your workers.

- ▶ The first page of the findings document gives you the opportunity to give this overall assessment for the hazard.

- ▶ For example:
 - “We have very little in place to protect workers from this hazard.”

 - “With just a few additions to the program, we will be in good shape in protecting workers from this hazard.”

 - “Most of our employees are exposed to this hazard on an everyday basis, and it is a serious concern.”

Gap Analysis “Findings” Document



- ▶ Do not get bogged down worrying about which section to use to describe a gap, or having an answer for every question. The document will be read through in detail, so all the information will be available to the reviewers wherever it is placed.

- ▶ If there is not applicable information for a question you can:
 - Leave it blank.
 - Put “N/A” (not applicable). (For example in the equipment section if safety equipment is not needed for this hazard).
 - Put “we were not able to determine this information.”

- ▶ There is no “right” or “wrong” way for the gap analysis, or for how to write up your answers. This is an opportunity for your committee, in your own words, to inform senior management about anything missing for protecting workers from this hazard, why it is missing, and suggested improvements. Any information you give will be extremely valuable.

Gap Analysis “Findings” Document



- This is big picture information. You should only need a few sentences to describe each gap.

Policy and Upper Management Support:

- “We have a formal written policy for this hazard. However, the protections outlined in the policy have not been fully implemented into day-to-day use on the job.”

Use of a Technical Standard:

- “We follow some but not all of the provisions of the OSHA (or relevant) standard for this hazard.”

Accountability:

- “We have no formal method to ensure that required protections are followed.”

Training:

- “While annual training is required for all employees, only half of our employees were trained three years ago.”

Controls:

- “We have some types of the needed safety equipment, but we do not have all of the different types needed to cover every situation with this hazard.”



Gap Analysis “Findings” Document

- ▶ *Prevention / Mitigation Ideas*

If you have implemented any ways to prevent or reduce the risk to employees from this hazard, or if you have any ideas about how to prevent or reduce risk from this hazard, please list those here. Even “outside the box” ideas that have not been tried may lead to a way to keep employees safer, so please include those. These ideas will be shared among the other health and safety committees across all secretariats/agencies to help reduce risk to all employees from this hazard, and may also be used in development of centralized prevention strategies.

- ▶ *Model Policies/Procedures, Innovative Strategies*

If you have developed any successful strategies or written policies or procedures for this hazard that you would like shared with the other health and safety committees, please list them here, and attach them electronically when you send in all the documents from your committee. This could also include a description of how you successfully implemented an existing policy, most importantly if others are struggling with implementation. We will be creating a web-based resource of model policies and procedures so everyone does not have to keep “reinventing the wheel,” and we can build on the successes that have been achieved by all of our colleagues. If you would like to include contact information for those who may have questions about your model policy, that would be very helpful.



Send in all together at the end:

1. Committee Information Sheet
2. Hazards List – Yes/No for applicability
3. Completed Hazard Assessment Questionnaires (for all applicable hazards)
4. Completed “Gap Analysis” Findings Documents (for all applicable hazards)



Thank You

- ▶ The information we are trying to collect is both abstract and complex. Managing health and safety is very challenging, and cannot be solved with “quick fixes” or checklists.
- ▶ The comprehensive information you are preparing will be extremely helpful in creating a strategic, realistic, and effective plan to address state worker health and safety in a comprehensive, systematized and meaningful way.
- ▶ Your participation in the EO 511 effort as well as your patience with the complexities of this work are very greatly appreciated.