COMPACFLT/COMUSFLTFORCOM/
COMNAVEUR/COMNAVAFINST 5100.9A

FLEET SAFETY MANAGEMENT SYSTEM

DEPARTMENT OF THE NAVY
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U.S. NAVAL FORCES EUROPE-AFRICA PSC 809 BOX 70 FPO AE 09622-0070

COMPACFLT/COMUSFLTFORCOM/
COMNAVEUR/COMNAVAFINST 5100.9A
N01FS/N03S/N01-SAF
21 Dec 2022

COMPACFLT/COMUSFLTFORCOM/COMNAVEUR/COMNAVAF
INSTRUCTION 5100.9A

From: Commander, U.S. Pacific Fleet
Commander, U.S. Fleet Forces Command
Commander, U.S. Naval Forces Europe-Africa

Subj: FLEET SAFETY MANAGEMENT SYSTEM

Ref: (a) OPNAV M-5100.23
(b) OPNAVINST 5100.23H
(c) OPNAVINST 5100.19F
(d) OPNAVINST 3500.39D
(e) OPNAVINST 5102.1E
(f) OPNAVINST 3500.37D
(g) OPNAVINST 5200.25E
(h) OPNAVINST 3501.383
(i) DoDI 6055.01
(j) International Maritime Organization – Safety of Life at Sea, CH 9 (1974, 1988, as amended)
(k) International Maritime Organization – "International Safety Management Code" (2018 ed.)
(l) MOA between Military Sealift Command & U.S. Coast Guard dtd 20 May 2021

1. Purpose

a. This instruction establishes a comprehensive Fleet Safety Management System (SMS) policy. References (a) through (l) outlines Fleet SMS principles, and requirements.

b. Per reference (a), the Fleet SMS has been updated to align with the Office of the Chief of Naval Operations (OPNAV) SMS. The OPNAV SMS establishes a framework for unified and resilient safety management across the U.S. Navy (USN). Fleet leaders should read and understand the OPNAV SMS in its entirety.

c. The Fleet SMS provided in this instruction is significantly revised from the previous version to provide a more comprehensive and resilient system that promotes operational excellence through continuous improvement. Fleet SMS is based on the following principles:

(1) Inculcating continuous learning;

(2) Identifying and correcting problems while they are small before they grow into deeper, more systemic issues;

(3) Clearly indicating risk ownership;

(4) Elevating risks if unacceptable;

(5) Formally communicating hazards and near misses; and

(6) Establishing accountability at the appropriate level.

d. This revision to the Fleet SMS policy introduces new concepts and requirements by:

(1) Defining desired outcomes such as safe place, safe people, safe property and material, safe processes and procedures (4Ps);

(2) Introducing the plan, do, check, act (PDCA) utilizing policy, risk management, assurance, and promotion within the PDCA framework;

(3) Redefining accountable person (AP) for all Echelon II and below commands, who are ultimately responsible for "Safe-to-Operate" and "Operates Safely" across the 4Ps;

(4) Introducing a systems-based approach to risk utilizing the resilience model;

(5) Defining a proven work model;

(6) Defining requirements and essential elements of an SMS and a safety management plan (SMP); and

(7) Providing guidance for command hazard review boards.

2. Cancellation. COMUSFLTFORCOM/COMPACFLTINST 5100.9

3. Scope and Applicability. This SMS instruction applies across the Fleets, comprised of military and civilian personnel, contracted employees, and industry partners. Commanders from Echelon III down to individual units must establish or confirm an effective SMS and/or a SMP, depending on the operational employment of the command. The SMS or SMP will be unique to that command's mission, functions, tasks, and employment cycle.

4. Policy. All Fleet units will comply with the requirements and responsibilities set forth in this instruction and the references (a) through (l). In the case of contradictions, higher policy and/or guidance takes precedent over this instruction.

5. Commanders' Intent

a. Safe/Effective Operations. Safety and risk management are foundational to everything we do across the Fleets. Your understanding and strict adherence to controlling risk maximizes readiness and increases the effectiveness of all aspects of our work, including combat operations.

b. Safety is Commander's Business. The principles of safe operations are unchanged: profound competence in our work, strict compliance to proven safe practices, and engaged leadership that provides critical oversight, and emphasizes safety as a responsibility of personnel at every level. Embracing the importance of safe operations, and effective risk management is a foundation upon which we relentlessly pursue readiness, which makes our Fleets stronger and more combat effective.

c. Safe Operations. The pursuit of safe operations creates a transfer effect that manifests in operational excellence. Demanding ownership and accountability for safety in every facet of our work results in specific positive outcomes: focusing more attention on training and readiness to perform key tasks, scrutinizing processes and procedures, critically self-assessing and improving performance, and cultivating a questioning attitude that empowers all hands to identify and communicate risk.

d. Safety is Not a Department. It is a responsibility born by all our military and civilian personnel, contracted employees, and industry partners. It requires continuous investment in training, as well as a culture that clearly assigns responsibility and demands accountability to deliver safe processes, and mitigation of risk. Leaders must demonstrate a deep personal commitment to prioritizing safety, fostering a culture of critical self-assessment and continuous improvement, and rewarding critical thinking and problem solving to mitigate risk.

6. Records Management. Records created as a result of this instruction, regardless of media and format, must be managed per Secretary of the Navy (SECNAV) Manual 5210.1 of September 2019.

7. Review and Effective Date. Per OPNAVINST 5215.17A, COMPACFLT (N03S), COMUSFLTFORCOM (N01FS), and COMNAVEUR-NAVAF (N01-SAF) will review this instruction annually on the anniversary of its effective date to ensure applicability, currency, and consistency with Federal, Department of Defense, SECNAV, and USN policy and statutory authority using OPNAV 5215/40 Review of Instruction. This instruction will automatically expire 10 years after effective date unless reissued or cancelled prior to the 10 year anniversary date, or an extension has been granted.

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Releasability and distribution:
This instruction is not cleared for public release and is available electronically via COMPACFLT Headquarters Information Portal Web site, https://flankspeed.sharepoint-mil.us/sites/CPF-HQ

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CHAPTER 1
INTRODUCTION

1. Purpose. Establish a Fleet SMS policy and assign responsibilities for administering a comprehensive Fleet SMS to maximize safety and operational readiness through continuous learning and improvement.

2. Vision. Ensure mitigations are in place to avoid and/or correct organizational drift toward failure by applying "Best-in-Breed" safety attributes from leading military organizations and private companies. Best-in-Breed safety attributes include:

a. Defining safety as a core organizational value and do not relegate safety to the status of a priority, process, or program;

b. Linking safety culture to mission accomplishment;

c. Providing top-level safety leadership;

d. Promoting employee involvement and empowerment;

e. Conducting regular analyses of the work place to understand how work is done and identify hazards, as well as safeguards;

f. Applying strong use of safety standards, processes, and protocols that are constantly reviewed/updated;

g. Implementing assurance systems such as inspections and/or assessments that involve both operating units and the safety organization;

h. Employing a rigorous, accessible issue (mishap, hazard, and near miss) reporting system and/or risk register (e.g., Risk Management Information system (RMI));

i. Providing command-wide standards for safety and skill training;

j. Using both leading and lagging metrics to measure safety trends; and

k. Resourcing and sustaining effective safety systems.

3. Discussion

a. The U.S. Navy's (USN) safety programs were typically reactive and focused primarily on Class A mishaps. Less focus was given to investigating and addressing smaller mishaps,

hazards, and causal factors of near misses as well as other precursors or indicators of deeper systemic issues. **A more proactive approach to safety is required.** Safety is an all-hands commitment, from the deckplate to the highest levels of command. The USN is a "can do" organization, but we must guard against slipping into a "must do at all costs" mindset, where risks are not adequately recognized or reported. We will do that by establishing a day-to-day culture where all personnel are empowered to provide backup, small problems are actively addressed thereby preventing larger problems from developing, processes provide defense-in-depth, and leaders communicate residual risk up the chain of command (COC).

b. The Fleet SMS presents a common, consistent framework with best practices for risk appraisal and risk management. The Fleet SMS also facilitates consistency in risk communication and decision-making. In this methodology, commanders and staff use a framework that appraises, manages, and communicates risk. The methodology described in this instruction, coupled with sound judgement, helps determine risk levels and mitigation strategies to facilitate informed decisions.

c. We will continue to execute and refine the Fleet SMS to advance a proactive safety and risk-management culture. The four Fleet SMS pillars (Policy, Risk Management, Assurance, and Promotion) will continue to be implemented into existing policies, programs, and processes that support the Optimized Fleet Response Plan (OFRP) and other force generation and readiness models. They rely on the basic watch standing principles of formality, ownership, level of knowledge, forceful backup, questioning attitude, procedural compliance, and integrity. These principles play a vital role in providing the defense-in-depth required to successfully deal with the dynamic nature of naval operations, exercises and maintenance. The SMS will remain flexible and scalable to allow individual commanders to tailor their SMS or Safety Management Plan (SMP) to specific missions and operating environments.

4. Definitions

a. Accountable Person. Accountable Person (AP) is the individual who is personally accountable with the authority and responsibility for the effective execution of the SMS or SMP. This is typically the Commander/Commanding Officer (CO)/Officer-in-Charge (OIC) as owner of all risk within their command. This responsibility cannot be delegated.

b. As Low as Reasonably Achievable. As Low as Reasonably Achievable (ALARA) is an acronym for "as low as (is) reasonably achievable," which means making every reasonable effort to maintain risk exposure as low as practical, consistent with the purpose for which the activity is undertaken, taking into account the state of equipment, competency of the workforce, expense of elimination and/or mitigation efforts, and other societal and socioeconomic considerations, in relation to mission accomplishment. “Reasonable” requires the degree of risk (likelihood × severity) of a particular activity or environment to be balanced against the costs to both avoid the risk, and potential outcome of failure. The greater the risk, the more likely it is that it will be

reasonable to go to very substantial expense to reduce it. If the consequences and the extent of a risk are small, the same substantial expenses would be considered disproportionate to the risk, and it would be unreasonable to have to incur them to address a small risk. ALARA sets the baseline threshold for Acceptable Level of Risk (ALR) that an AP can influence or accept at their level of command. If the risk exceeds this threshold, risk decisions should be elevated to the next higher Echelon AP.

c. Available Resources. Capabilities and capacities, including manning, training, equipment, time and funding, available to APs to source requirements under Doctrine, Organization, Training, Material, Leadership, Personnel, Facilities, and Policy (DOTMLPF-P). Risk is incurred when gaps in available resources versus mission requirements exist.

d. Competence. A person who is trained and qualified on all aspects of conducting their work properly. Competent persons are experienced, proficient, procedurally compliant, current, risk-aware, and fit to work (i.e., good general health and mental well-being).

e. Defense-in-Depth. A layered approach to designing and sustaining a system involving the use of successive compensatory measures that prevents accidents and mitigates the severity of cumulative effects of smaller issues. The key is creating multiple independent and redundant layers of defense to compensate for potential human and mechanical failures or unexpected or undesired changes in conditions so that no single layer, no matter how robust, is exclusively relied upon to prevent a mishap. This approach defends against latent, unrealized weaknesses in a system or mistakes made by humans working within the system (unsafe behaviors carried out by individual parties).

f. Issue. An issue is an event or situation where encounter with a hazard has occurred, or is expected to occur, which is certain or has the potential to negatively impact mission and/or task accomplishment or cause injury, death, or property damage. Mishaps, hazards and near misses are all examples of issues.

g. Occupational Safety and Health. A multidisciplinary field that maintains the highest degree of military and civilian personnel readiness and physical well-being by preventing illness or injury induced by hazards and exposures in the workplace. Activities include facility and equipment design, training, personnel competence, procedural compliance, hazard analysis, exposure prevention, leadership, enforcement, and oversight of comprehensive health and safety programs that promote health and safety of personnel while performing official duties in an on-duty status. Generally, risk decisions are made at higher level than the unit level, and the unit role is to ensure compliance with established standards and controls.

h. Operate Safely. The CO, unit leadership team, and operators all have a duty to operate safely by preserving the safe to operate conditions. Operate safely is executing the mission within the designed safety envelope, while controlling unforeseen anomalies as they arise. The

safety envelope is normally maintained by operating within established procedures. When unplanned or unforeseen safety risks manifest outside of the approved safety case and the military benefit (operationally defined objective) of taking the risk outweighs the cost of the risk exposure, then commands should apply the principles of operational risk management to control risk.

i. Operational Safety. A multidisciplinary field that promotes and strives to maintain the highest degree of aircraft, surface vessel, subsurface vessel, and ground support equipment readiness by preventing property damage or personnel injury during peacetime and wartime activity. Activities include efforts to continually improve equipment design, training, hazard identification, risk controls (e.g. procedural compliance), individual, team and crew competence, leadership, oversight, effective communication, and the timely application of operational risk management principles at all levels. Risk decisions are constantly made that weigh mission requirements, and controls are designed and implemented at many levels before and during operations. Safe operations are typically effective operations, and unsafe operations are never effective.

j. Recreational and Off-Duty Safety. A multidisciplinary field that maintains the highest degree of personnel readiness and physical well-being of military personnel, civilian employees, and their families while engaged in non-command directed motor vehicle operations, individual and team sports, and leisure activities. Activities include facility and equipment design, training, performance, compliance and oversight of comprehensive recreational and off-duty safety programs that promote health and safety of personnel when in an off-duty status, whether on or off Department of Defense installations.

k. Resilience. The ability of a system to adjust so that it can sustain normal functioning in the face of changes and disturbances.

l. Risk. Probability of adverse outcome such as failed or degraded mission, injury, illness, or loss due to encounter with an identifiable hazard. Risk level is expressed in terms of hazard probability and severity.

m. Risk Assessment. A structured process to identify and assess hazards. An expression of potential harm, described in terms of severity, probability, and exposure to hazards. Risk assessment is a critical function of Operational Risk Management (ORM).

n. Risk Control. An activity or measure that is expected to reduce the likelihood of a risk event occurring. Commanders, supervisors, deckplate Sailors, and civilians make risk-based decisions daily. They apply risk controls to evaluate and mitigate the barriers to mission accomplishment (risk to mission) and the threats to personnel and equipment (risk to force). In doing so, it is a common misconception that risk to mission and risk to force must be "balanced"

or are inversely proportional. Reducing risk to force does not automatically increase risk to mission or vice versa.

o. Risk Control System. A collective term encompassing the risk identification and assessment, the management of risk through ORM procedures, response to emergent threats and issues, measures to preserve established risk controls including record keeping, continual self-assessment and timely adjustments in response to changes in the operational environment and/or safety envelope. All of these efforts enable a resilient system.

p. Risk Register. A repository for capturing and recording risks and associated information. Risk Management Information (RMI) is the USN's official repository for capturing and recording risks and associated information. APs should document risks and issues in RMI, using a consistent template to enable oversight, decision-making and risk communication up and down the COC.

q. Safe to Operate. The as-designed safety for places, property, material, people, processes, and procedures. It is the defining design, policy, engineering, resourcing, and expectation management that sets the safety risk envelope for the hazardous activity or activities for a given operating environment. Original Equipment Manufacturers, Systems Commands, Program Offices, and upper Echelon commands are primarily responsible for the Safe to Operate criteria.

r. Safety Case. A safety case is simply a structured argument, supported by a body of evidence that provides compelling, comprehensive, and valid case that a system is safe for a given application in each operating environment and that risks have been mitigated to ALARA through appropriate and effective safety controls.

s. Safety Envelope. The safety envelope is normally maintained by operating within established policies, procedures and sufficient resources. When unplanned or unforeseen safety risks manifest outside of the approved safety case and the military benefit (operationally defined objective) of taking the risk outweighs the cost of the risk exposure, then commands should apply the principles of ORM to control and communicate risk.

t. Safety Management Plan. Policy framework for implementing the safety management system to achieve the desired outcomes of the SMS. SMPs are the documents that implement the desired outcomes of the SMS. SMPs define and communicate performance expectations and may include additional guidance on risk accountability and communication expectations.

Note: SMPs include most policies, procedures, and guidance documents that guide operations across the full spectrum of activities including combat actions.

u. Safety Management System. A formal, top-down/bottom-up, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk controls. This often involves a systems of systems approach that inculcates procedures and policies throughout the organization working together to achieve the safety management system desired outcomes.

CHAPTER 2
RESPONSIBILITIES

1. All Commands Echelon 2 and Below

a. An SMS is required for all Echelon III commands. Echelon III commands may use this instruction as their SMS or produce a tailored SMS. Either approach is acceptable, the requirements for an SMS are found in Chapter 3 of this instruction. An SMS is not required for Echelon IV and below commands. **Where feasible, commands may combine SMS requirements with those of other similar programs (e.g., risk management, force improvement, self-assessment, etc.) into one document to prevent duplication of processes and/or administration.**

b. An SMP is required for Echelon IV and below commands. The requirements for an SMP are found in Chapter 4 of this instruction. **Where feasible, commands may combine SMP requirements with those of other similar programs (e.g., risk management, force improvement, self-assessment, etc.) into one document to prevent duplication of processes and/or administration.**

c. Accountability expectations in this Fleet SMS are based on responsibilities and authorities established by other documents (e.g., administrative control, operational control, incident command system for emergency response, etc.). A command's SMS or SMP should be tailored according to these responsibilities and authorities. **Whether executing Administrative Control (ADCON) or Operational Control (OPCON) or both, the AP for a given activity is normally the commander issuing an order, instruction or other directive requiring action at the unit level. That commander is accountable for the safe execution of such orders, instructions, or directives. Coordination with supporting commanders, (e.g. Systems Commands, program managers, warfare centers or warfighting development centers) is necessary to effectively communicate and manage risk by the AP.**

d. Each Echelon II and below command is required to conduct a quarterly Hazard Review Board (HRB), which may be combined with the Safety Council, to assess the command's operational, occupational and health, and recreational safety program effectiveness. The HRB should provide regular reports to the AP. For upper Echelons, the HRB assists in validating subordinate commands are safe to operate. For lower echelons, the HRB assists in assessing whether units are operating safely. Where issues are identified, the HRB should make recommendations for specific corrective actions to mitigate risk. HRB responsibilities include:

(1) Review the status of any outstanding safety action items, review any mishaps or near misses since the last meeting, review and update the risk register for any status changes or closeouts, review the upcoming period to identify any new risks to be added to the risk register, and approve any new action items and/or closeout of completed action items.

(2) Collect, process, and review lessons learned and best practices within the command's span of control, and implement corrective actions for issues within the command's authority based on lessons learned trends and unit level Plan, Brief, Execute, and Debrief (PBED) process, including post-deployment and/or mission briefs.

e. Per reference (f), the Navy Lessons Learned Program applies to Fleet and Type Commanders, Carrier and Expeditionary Strike Groups, and afloat and ashore units that collect and submit lessons learned or port visit reports. The Navy Lessons Learned Program is intended to systematically refine and improve Fleet operations while integrating lessons and best practices to inform USN doctrine, organization, training, material, leadership, education, personnel, facilities, and policy. Each command is required to designate a command lessons learned improvement manager to lead the review, validation, and processing of Fleet Navy Lessons Learned Information System (NLLIS) submissions of assigned forces. **This may be done through the HRB to prevent duplication of processes and/or administration.**

f. All commands must identify problems, negative trends, and root causes; develop measures of effectiveness for improvement, and implement corrective actions. Commands must have a process to review the effectiveness of previous corrective actions. Problems and negative trends that cannot be corrected at the unit level must be forwarded with recommendations to the next higher Echelon for risk acceptance and/or corrective action.

(1) Assess the effectiveness of their SMS and/or SMP throughout the command, unit, and/or activity, including alignment with higher Echelons and effectiveness and/or efficiency of lower Echelon SMS and/or SMP documents.

(2) Serve as the contact for subordinate commands to interpret policy, address needs and concerns, and provide subject matter expertise for technical SMS and/or SMP matters.

(3) Ensure SMS and/or SMP documents are reviewed every 3 years for subordinate commands to ensure they are both effective and efficient. Include required department heads, special assistants, and functional/cross-functional team leaders to properly review all areas that affect the SMS and/or SMP. Ensure adequate resources are available to support an effective SMS and/or SMP.

(4) Designate a lessons learned improvement manager to utilize inputs received from Naval Safety Command, other Fleet headquarters, subordinate commanders, NLLIS, Risk Management Information (RMI), and other reporting systems (e.g., Jupiter, Enterprise Safety Application Management System (ESAMS), etc.) to communicate across the Fleet lessons learned, near misses, and other applicable data that may apply Navy-wide. Communication of lessons learned, along with action to correct deficiencies, are vital for preventing recurrence of mishaps.

(5) Develop and implement an oversight process to evaluate SMP effectiveness at subordinate commands. Evaluations should be included as part of a command inspection or readiness assessment, whenever possible, and leverage existing events. The evaluations must be conducted at a minimum of every 3 years and include reviews of operational, occupational safety and health, and recreational safety program effectiveness. Evaluations should also assess how well ORM is applied within the PBED construct during operations and training.

g. Where available resources prevent mitigating risk to ALARA, commanders must raise the risk to higher command or authority's AP.

2. Fleet Commanders

a. When executing the requirements listed in Chapter 2, paragraph 1, provide a linkage between subordinate commands and the Office of the Chief of Naval Operations (OPNAV), Naval Safety Command, and/or other Echelon I organizations or processes (e.g., Learning to Action Board; Get Real Get Better initiatives, etc.).

b. Communicate significant lessons learned, trends, and/or best practices identified across all Fleet processes, programs, and inspections.

c. Conduct an annual Fleet Operational Safety Board (FOSB) to review the effectiveness and efficiency of operational, occupational and health, and recreational safety programs between Echelon II Fleet Commanders.

d. Establish and maintain a periodic Fleet Operational Safety Council (FOSC) with Echelon III commands participation to coordinate and share information across the four SMS pillars.

3. Type Commanders, Numbered Fleet Commanders and other Echelon III Commanders

a. Execute the requirements listed in Chapter 2, paragraph 1, with the following additional considerations:

(1) Integrate across multiple activities and mission areas for a command when identifying trends and managing risk. For example, problems identified during a command's tactical inspection that are similar to problems identified during multiple maintenance-related incidents could provide insight into broader organizational issues. This example highlights both the opportunity and importance of identifying vulnerabilities or "error traps" that exist in a system, to include developing a deep understanding of the associated root causes. This process may be facilitated by the use of a set of standardized causal factors, and demonstrates the pervasion and recurrence of common safety climate or "cultural" factors throughout the unit. Often, these

factors are not limited to a single division or department. Once trends are identified, actionable mitigations and corrective actions must be developed, implemented, and verified to inoculate the crew against recognized risk.

(2) When issues are parsed into the underlying root causes, common trends within the command can be identified, and interventions can be developed. While the traditional approach to corrective actions is generally effective at preventing the same or similar issues from recurring, some root causes warrant a broader approach to mitigate command-wide vulnerabilities or risk.

(3) Some underlying factors that contribute to safety issues take hold over long periods of time. For example, poor maintenance practices, lack of procedural compliance, and informal communications or turnovers generally evolve over time. It is rare that these practices occur out of the blue, or that a single bad decision leads directly to a mishap. More often, it is the accumulation of risk over time as a result of "organizational drift," which is the slow, incremental movement away from "what right looks like." Organizational drift is difficult to recognize, unless high standards are maintained and actively enforced. When seemingly small departures from safety and standards go unchecked and there are no real consequences, such departures become normalized. The lack of a mishap, however, does not mean you are safe. An issue and its outcome are different. A near miss or a mishap can have the same set of causal factors, and the difference in the outcome can be a matter of consequence (or lack thereof), including timing of action or inaction. We have a tendency to treat a set of actions or behaviors differently depending on the severity of the outcome. **A key objective of the SMS is treat near misses as warnings or alerts that deserve and receive the appropriate level of attention.** For example, the investigation into the USS *Fitzgerald* (DDG 62) and USS *John S. McCain* (DDG 56) collisions revealed that causal or contributory actions or inactions were not unique to the day of the respective mishaps. In other words, these ships did not just have "a bad day." Reports cited several existing accepted practices (instances of organizational drift) that did not conform to written standards. In every mishap, a combination of these same seemingly minor departures from procedures or standards contributed to the mishap.

b. Ensure the organization is properly resourced to be safe-to-operate and operate safely. Commands should review their resourcing requirements across the DOTMLPF-P spectrum. Assess whether the safety for places, property, material, people, processes, and procedures (4Ps) meet design criteria. The risk register should account for insufficient resources in order to inform Original Equipment Manufacturers, Systems Commands, and Program Offices. Elevate unmitigated resource risks to higher Echelon commanders.

c. Military Sealift Command (MSC) unique responsibilities – MSC operates in accordance with commercial maritime practices following international regulatory requirements for safe operation of the vessels. MSC has an established Safety Management System (SMS) for the

Government Owned-Government Operated vessels and contractually requires Government Owned-Contractor Operated vessels to maintain the same. The MSC Safety Management System meets the International Safety Management (ISM) Code for safe management and operation of ships. Where requirements of this document are not met in the current MSC SMS structure, MSC may assign responsibility to a MSC Force Safety Officer as determined by the Commanding Officer. Where there is conflict, MSC ISM SMS takes precedence for the operation of MSC vessels.

4. Echelon IV and Below Commanders

a. The AP for Echelon IV and below commands is the Commander, CO, or OIC. They are therefore responsible and accountable for ensuring units are Safe-to-Operate across the 4Ps in cases where unit certification and/or acceptance applies, as well as ensuring that units operate safely in the execution of hazardous activities in cases where the conduct of operations, exercises, and maintenance applies.

b. Develop an SMP in accordance with Chapter 4 of this instruction.

5. Staff Headquarters and other Shore Activities Supported by a Regional Safety Office (RSO)

a. Maintain a command safety program that incorporates the requirements of this instruction. This is supplemental to the SMS or SMP and is intended to manage Navy Safety and Occupational Health (SOH) requirements internal to the headquarters (i.e., not part of the oversight of subordinate commands)

b. Appoint and train a full-time or collateral duty Safety Officer. Provide the name and contact information of the Safety Officer to the RSO.

c. Adopt and implement RSO recommendations and mandates.

d. Communicate Base Operating Support (BOS) needs to the RSO. Report unmet needs to the respective Director of Fleet Safety and Occupational Health (i.e., U.S. Pacific Fleet, U.S. Fleet Forces Command, or U.S. Naval Forces Europe/Africa).

6. Fleet Shore Activities Not Supported by RSO

a. Maintain a command safety program that incorporates the requirements of this instruction. This is supplemental to the SMS or SMP and is intended to manage SOH requirements internal to the headquarters (i.e., not part of the oversight of subordinate commands).

b. Appoint and train a full-time or collateral duty Safety Officer. Provide the name and

contact information of the Safety Officer to the Safety Officer and/or Director at the next higher Echelon headquarters.

c. Adopt and implement higher Echelon recommendations and mandates.

d. Commands located on a joint or remote base that are not supported by RSO should follow the safety guidance of the lead Department of Defense (DoD) organization at the facility.

7. Safety Officers and Safety Professionals

a. Utilize all tools available (NLLIS, SRCP, Jupiter, RMI, etc.) to effectively communicate lessons learned, near misses, and risk mitigation efforts to prevent recurrence of mishaps throughout the enterprise, Fleet, and USN.

b. Effective communication is vital to achieving and maintaining a healthy safety culture. When personnel regularly communicate with each other in an open and respectful manner, regardless of rank, they are also more willing to give and receive feedback. Effective formal and informal communications also support teamwork and coordination across a unit or organization.

CHAPTER 3
SAFETY MANAGEMENT SYSTEM ESSENTIAL ELEMENTS

1. Discussion

a. The SMS provides a framework tailored from the OPNAV SMS that includes the Plan, Do, Check, Act (PDCA) principles, and the 4Ps to enable the discovery, communication, elevation and acceptance of risk at the appropriate level. This plan facilitates a standardized approach for managing safety programs throughout the Fleet and fostering enhanced readiness. This safety construct requires identification of hazards and control of associated risks, including identifying proper risk-acceptance authority. Importantly, this SMS is a continuously maturing system that requires monitoring and adjusting to optimize safety performance and results.

b. To meet DoD requirements, the Fleet SMS can be thought of as operating in PDCA fashion to achieve long-term continuous improvement. Policies and procedures designed to meet operational safety, occupational safety and health, and recreational and off-duty safety improvements are developed and implemented (Plan and Do), results are evaluated using performance data and Fleet feedback (Check), and further refinements or course changes are initiated as needed to improve future results (Act).

c. Per reference (b), the implementation and maintenance of an SMS, its effectiveness, and its ability to achieve desired outcomes are dependent on a number of key factors, which may include:

(1) Resilience;

(2) Situational Awareness (SA);

(3) Leadership;

(4) Proven Work Model;

(5) Assurance; and

(6) Key Indicators.

d. Demonstration of successful implementation will give assurance to workers and other interested parties that an effective SMS is in place. The PDCA concept is an iterative process used by organizations to achieve continual improvement. It can be applied to a management system and to each of its individual elements, as shown in Figure 3-1 below.

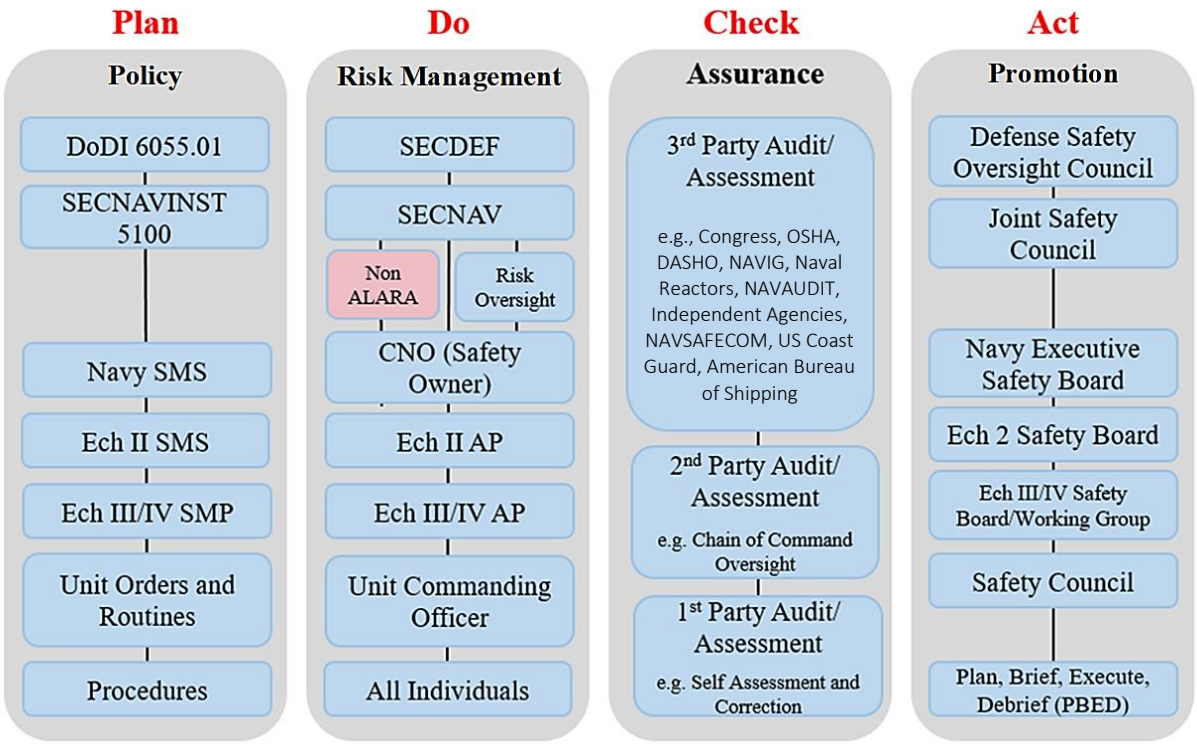

FIGURE 3-1. SMS RESPONSIBILITY STRUCTURE BASED ON THE ISO 45001 PRINCIPLES

2. SMS End-State

a. The SMS end-state results in the 4Ps through the four SMS pillars.

(1) Policy (Plan). Policies and procedures to establish senior leadership commitment to continually improve safety; defines the methods, processes, and organizational structure needed to meet safety goals.

(a) Establishes leadership commitment to safety performance through SMS.

(b) Establishes clear safety objectives and commitment to manage to those objectives.

(c) Defines methods, processes, and organizational structure needed to meet safety goals.

(d) Establishes transparency in management of safety.

1. Fully documented policy and processes.

2. Sailor reporting and resolution system.

3. Accountability of both leaders and subordinates at all levels.

(e) Builds upon the processes and procedures that already exist.

(f) Facilitates cross-organizational communication and cooperation.

(2) Risk Management (Do). ORM determines the need for, and adequacy of, new or revised risk controls based on the assessment of acceptable risk.

(a) A formal process within the SMS composed of:

1. Describing the system;

2. Identifying the hazards;

3. Assessing the risk;

4. Analyzing the risk;

5. Controlling the risk;

6. Making risk decisions at the right level.

(b) The Risk Control process is used to develop the safety case and may be embedded in the policies and procedures that govern the system.

(3) Assurance (Check). Evaluates the continued effectiveness of implemented risk control strategies; supports the identification of new hazards.

(a) SMS process management functions that systematically provide confidence that organizational outputs meet or exceed safety requirements.

(b) SMS has a dual safety assurance focus:

1. Operational Organizations;

2. Force providers.

(c) Ensures compliance with SMS requirements and governing orders, instructions, policies, and directives.

1. Information Acquisition:

   a. Audits and evaluations;

   b. Employee reporting.

2. Data Analysis.

3. System Assessment.

(d) Provides insight and analysis regarding methods and/or opportunities for improving safety and minimizing risk.

(e) Existing assurance functions will inform decision makers and/or APs and continue to evaluate and improve readiness.

(4) Promotion (Act). Includes training, communication, and other actions to build a positive safety culture within all levels of the command.

(a) Safety performance activities within the SMS framework include:

1. Providing SMS training;

2. Advocating and/or strengthening a positive safety culture;

3. System and safety communication and awareness;

4. Matching competency requirements to system requirements;

5. Disseminating safety lessons learned;

6. Feedback loop and sharing of lessons learned throughout the enterprise;

7. PBED.

(b) Everyone has a role in promoting safety.

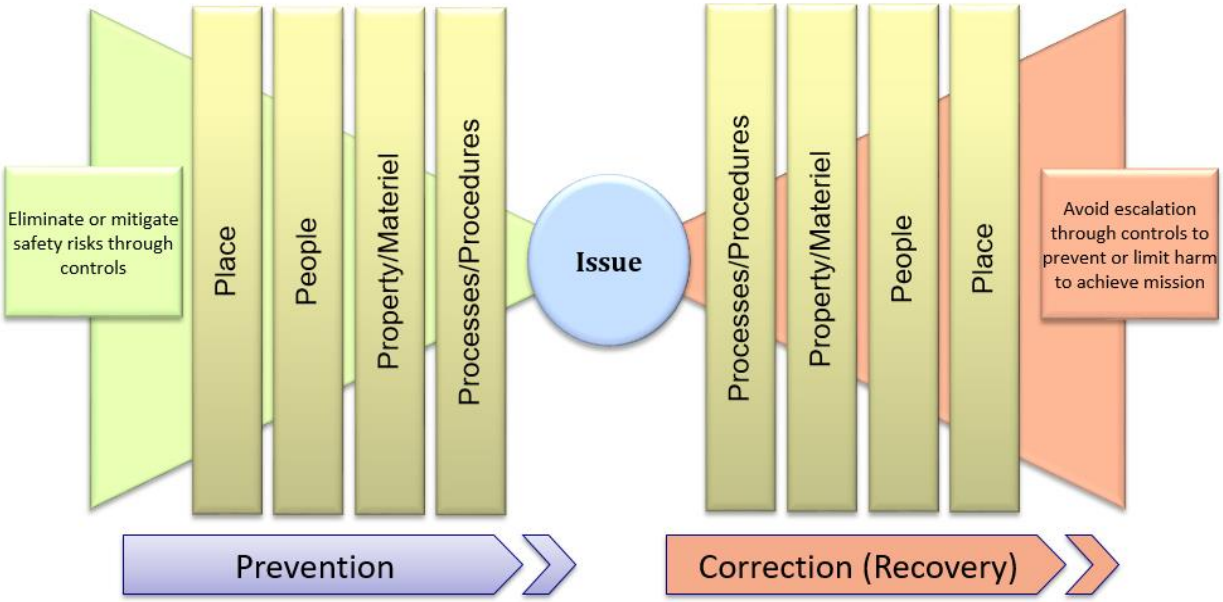

FIGURE 3-2. RESILIENCE MODEL

b. The resilience model is part of the SMS and is described in detail in reference (a). Resilience is the ability of a system to adjust so that it can sustain normal functioning in the face of issues; in other words, "bounce-back from" or "absorb" unforeseen issues as discussed in reference (a). Data cannot predict the next mishap, but it can infer the level of resilience to risk. To determine whether sufficient resilience exists within the safety system, the efficacy of risk controls in each pillar shown in Figure 3-2 should be regularly measured and assessed. The four desired outcomes of a resilient system; safe place, people, property, material, processes, and procedures are discussed in detail in reference (a).

3. Proven Work Model. The proven work model is designed to provide a defense-in-depth with three elements (Engineering/Equipment, Supervision (effective supervision), and Training (trained operators)) necessary for the successful execution of work or operations. The proven work model is discussed in detail in reference (a). The work model is a tool that can be used by commands to ensure all operations are conducted in a safe manner. Inherent in the success of any work model is an understanding that results may not always meet intent. In complex systems, issues will likely arise that can lead to work results being off-plan. The proven work model incorporates the means to address these issues.

4. Policy. SMS essential elements set the policy foundation for a fully-functional and proactive Fleet safety culture. This culture anticipates issues by identifying hazards and applying risk controls to reduce human error and manage risk in order to avoid preventable mishaps and maximize our warfighting readiness. This SMS establishes expectations and objectives. It defines, documents, and communicates safety roles, responsibilities, and authorities throughout all levels of the COC. In addition, it documents the safety and risk management framework,

objectives, procedures, and records management process of our SMS. SMS safety policy elements, performance objectives, and expectations are provided in Table 3-1.

TABLE 3-1

Element	Performance Objective and Expectation
Governance and Organizational Commitment	• Implement an integrated, comprehensive SMS for the command. • Promote a proactive risk management culture, crossing all lines of operation to anticipate issues. • Establish process to identify hazards and apply risk controls to reduce human error and manage risk. • Ensure SMPs are aligned with SMS. • Include a risk assessment mechanism that is metrics-based, where possible.
Safety Governance Compliance	• Develop a plan to accomplish the objectives. • Convey the expectations and objectives to all personnel. • Define safety program responsibilities. • Provide guidance for establishing measurable safety objectives. • Develop a plan to accomplish the objectives.
Leadership Commitment and Safety Accountability	• Demonstrate commander's commitment to maintaining a proactive risk management culture. • Ensure adequate resources to implement and maintain aligned processes, procedures, and resources across warfighting communities. • Ensure APs at the appropriate level are making risk decisions. • Define, document, and communicate the safety roles, responsibilities, and authorities throughout COC.
Safety Team Leaders	• APs appoint key safety personnel throughout the COC with authority, resources and access to execute and maintain an effective SMS and SMP.
Mishap Response Planning	• Established procedures are in the event of an issue (mishap, hazard, near-miss). • Ensure reports are made to multiple agencies as required for each issue.

TABLE 3-1 (Cont'd)

Mishap Response Planning	• Administrative and operational COCs are informed and guidance is received (as required). • Process to capture lessons learned to mitigate the effects and reduce risk of future occurrence.
Hazard Control and Prevention Program	• Develop and implement procedures to identify, assess, prioritize, abate, and control hazardous conditions across its full spectrum of missions, functions, operations, and activities both on and off-duty. • Establish and publish SMPs that include: - Hazard Identification, Assessment, Abatement, Notification, and Control; - ORM; - Crew and Bridge Resource Management; - Crew Rest/Endurance and Fatigue Management; - Trend Analysis; - Safety Culture Workshops and Climate Surveys; - Education and Training. Note: Zone inspections, preventive maintenance checks, quality assurance audits, outside assessments of unit training, and similar efforts support these requirements.
Documentation and Records	• Document safety policies, objectives, procedures that meets or exceeds Fleet expectations and objectives Note: Can be accomplished through use of higher headquarters' policies, or written internal policies referencing higher authority regulations such as Naval Air Training and Operating Procedures Standardization, Engineering Operational Sequencing System, Combat System Operational Sequencing System, NAVSEA OP-4 "Ammunition and Explosives Safety Afloat," OPNAVINST 5102; CO's Standing Orders, ORM assessments, Technical Manuals, et cetera.

5. Risk Management. The risk management process examines the operational functions, tasks, and missions of the organization and their operational environment to identify hazards and to analyze associated risk. USN's ORM policy, detailed in reference (d) is the basis, and defines steps for in-depth, deliberate, and time-critical risk management situations when applied during the plan, brief, execute, debrief process. It also encompasses other risk management principles

practiced throughout the USN, consistent with USN's operational risk management policy and DoD Standard Practice for System Safety (MIL-STD-882E). Risk control elements, performance objectives, and expectations are provided in Table 3-2.

TABLE 3-2

Element		Performance Objective and Expectation
Safety Risk Control		• Develop level of knowledge of critical characteristics of platforms, capabilities, systems, operations and operational environment. • Apply level of knowledge to identify hazards, analyze and assess risk, and design risk controls. • Establish a risk acceptance process with feedback loops to established assurance methods. • Ensure risk decisions are made at the right level. • Evaluate the effectiveness of established risk controls.
Hazard Identification	Missions and Operational Capabilities	• Analyze missions, operational capabilities, and environment to identify hazards associated with planned activity (operations, exercises, maintenance, etc.). Include interactions within the organization (i.e., facilities, hardware, software, people, etc.) and the environment in sufficient detail to identify hazards.
	During Operations	• Identify and document the hazards in its operations that are likely to impact mission effectiveness, unit readiness or result in a mishap. • Determine the probability and severity of hazards and communicate them to others who may face the same conditions.
Risk Analysis, Assessment, and Control	Analyze and Assess Risks	• Use Safe-to-Operate criteria to establish the basis for initial risk assessment against identifiable hazards. • Use ORM to assess risks and determine acceptable level of risk decision. • Risk should be analyzed and assessed from both a risk to mission as well as a risk to force perspective.

TABLE 3-2 (Cont'd)

Risk Analysis, Assessment, and Control	Analyze and Assess Risks	Note: These concepts are not mutually exclusive nor inversely proportional. Mitigating risk to force often mitigates risk to mission and vice versa.
	Hierarchy of Risk Controls	• Establish a process for making risk decisions at the right level and elevating unacceptable risk.
	Implement Controls/Mitigate Risk	• Implement risk controls to mitigate risk to ALARA. **If ALARA cannot be achieved then elevate the risk.** • Formulate a plan for applying the controls selected. • Provide the resources necessary to implement controls. Note: To develop a safety case, the risk controls should be clearly described, evaluated to ensure that the expectations have been met, ready to be used in their intended operational environment. If residual, substitute, or new risks remain after controls have been implemented, the accepted risk must be communicated to all personnel and external commands affected. This includes cases where risk to force controls negatively impact risk to mission and vice versa.
Risk Analysis, Assessment, and Control	Manage Change	• Establish process to recognize and manage changes to minimize the introduction of new hazards and risks into the work environment. • Apply adaptive planning to rapidly address unforeseen hazards, new circumstances, and hazard control failures identified during the execution phase. • Dynamically identify and manage risk caused by changes that may affect established processes and services.

TABLE 3-2 (Cont'd)

Risk Analysis, Assessment, and Control	Manage Change	Note: Upon encountering unforeseen hazards and conditions or learning that, previously identified controls are not effective, the organization must temporarily stop process execution, identify and rapidly implement any new and/or changed hazard controls as needed, and resume with the revised hazard controls in place.

6. Assurance. Safety assurance involves routine and formal assessment through which justified confidence is provided that the safety requirements and standards have been met. In terms of resilience, assurance means that the risks and issues associated with equipment and resources, competent persons, infrastructure, and compliance have been identified, controlled, and owned at the appropriate level by an accountable person. The Assurance function applies external and internal evaluations to ensure risk controls, once implemented, continue to conform to their expectations and continue to be effective in maintaining risk within acceptable levels. These assurance and evaluation functions also provide a basis for continuous feedback and improvement. Assurance elements, performance objectives, and expectations are provided in Table 3-3.

TABLE 3-3

Element	Performance Objective and Expectation
Assessment Performance	• Monitor, measure, and evaluate the performance of their programs, processes and systems to: - Identify system deficiencies and opportunities for improvement; - Identify new hazards; - Measure the effectiveness of risk controls (i.e., including preventative and corrective actions); - Ensure compliance with regulatory requirements.

TABLE 3-3 (Cont'd)

Data Acquisition and Analysis	Systematic Monitoring	• Collect internal and external data to determine conformity and measure the effectiveness of risk controls, as well as assess SMS performance. • Monitor internal and external data for trending purposes to measure the effectiveness of risk controls, and assess SMS performance. • Assess the performance and effectiveness of Key Risk Indicators and Key Performance Indicators to SMS expectations per reference (a), and the objectives of the safety policy. Note: Reduce monitoring burdens by using existing data streams and reports wherever possible.
Data Acquisition and Analysis	Internal Audits of Operational Processes by Operational Departments	• Conduct first-party self-assessments to ensure compliance with policy and procedures. • Assess resiliency of the command (i.e. Safe-to-Operate and/or Operating Safely). • Identify emergent hazards and/or risks, and include in risk register. • Track and communicate AP determined risk controls. Note: When first-party auditing detects an unsafe condition, leaders must stop the activity, where reasonably practicable, to assess the risk of harm and not restart the activity until protective controls are in place that meet the ALARA condition or the benefit of the operational (not operating) imperative justifies continuing the activity.
	Internal Evaluation of the SMS/ SMP Internal Evaluation of the SMS/ SMP	• Conduct annual self-assessment of the SMS and/or SMP. • Determine whether the SMS results meet its objectives and expectations. • Document and communicate results to higher Echelon for review, noting any action required by higher headquarters.

TABLE 3-3 (Cont'd)

Data Acquisition and Analysis	External Auditing of the SMS/ SMP	• Second-party auditing must be conducted by APs in the chain of command. • Ensure incorporation of and compliance with the SMS and other applicable legislation, regulation, and/or policy. • Assure higher Echelon APs that subordinate commands are Safe-to-Operate and/or Operating Safely. • Provide a formal mechanism for the COC to: - Assess risks and issues (e.g., building a risk picture via risk register). - Assess readiness for the mission and confirm the SMS/SMP is effective at identifying, controlling, and owning risks and issues. - Determining if risks are held at the appropriate level depending on Acceptable Level of Risk (ALR) thresholds and whether the subordinate AP can mitigate the risk at their level. <u>Note</u>: It is inappropriate for AP to accept a risk if they do not have the authority or resources to mitigate the risk to an ALARA condition.
	Investigations	• Investigate issues and instances of potential regulatory non-compliance in accordance with applicable directives. • Investigations should determine all causal factors. • Share findings and recommendations among communities of interest to prevent recurrence. • Track recommended actions to completion and measure associated effectiveness.
	Personnel Reporting Feedback	• Establish and maintain an anonymous personnel safety reporting and feedback system. • Monitor to identify new or emerging hazards and root causes. • Assess performance and effectiveness of risk controls, to include root causes of any observed non-compliance.

TABLE 3-3 (Cont'd)

Continuous Improvement	Continuous Feedback	• Use established safety council, HRB, and other feedback loops to improve SMS. • Update and promulgate changes to SMS policy based on feedback and associated analysis. • Publish safety lessons learned to all personnel.
	Preventive and Corrective Action	• Act on recommendations and feedback to eliminate the causes, or potential causes, of ineffectiveness and/or non-compliance.
	Management Review	• Higher Echelons conduct regular reviews of the performance and effectiveness of subordinate SMS. • Reviews should include: - Progress in the reduction of risk; - Effectiveness in addressing underlying causes of risks and system deficiencies; - Status of corrective and preventive actions and changing circumstances; - Follow-up actions from SMS audits and previous management reviews; - Extent to which objectives have been met.

7. Promotion. Rarely is a mishap or serious issue the result of a single factor or due to the actions of a lone individual. Invariably an issue is the confluence of multiple organizational safety failures and local actions that creates a path to cause harm to people, damage equipment, or impact the environment. People manage risks and hazards every day during normal operations and in exceptional circumstances. Safety and risk management are critical to every mission, and the pursuit of safe operations creates a transfer effect that manifests in operational excellence. Effective organizational learning is dependent upon gathering and capitalizing on lessons learned from experiences across the organization. Continuous self-evaluation to the recognized standard is required to prevent organizational drift and the normalization of deviation from safe practices. Organizational learning is also about responsive and flexible organizations working hard to identify shortfalls and enact improvements to maintain resilience. Promoting safe performance consists of a range of activities that shape the Fleet safety culture of which multi-faceted communications and training are key elements. This is an important piece to the overall functioning of the Fleet SMS, which cannot succeed by mandate only or strict implementation of policy. Demanding ownership and accountability for safety in every facet of our work results in specific positive outcomes which promote safe operations: focusing more attention on the proper training and readiness to perform key tasks; scrutinizing processes and

procedures; critically assessing our level of compliance; raising standards of performance; and cultivating a questioning attitude that results in Sailors raising a red flag when they see risk and seeking continuous improvement. This results in a defense-in-depth approach to safety which will improve the performance and reliability of our machinery, enhance the execution of operations, and ultimately accelerate advancements in warfighting readiness and lethality. Promote elements, performance objectives, and expectations are provided in Table 3-4.

TABLE 3-4

Element		Performance Objective and Expectation
Leadership Participation		• Personally establish a proactive safety culture at all Echelons through policy, communication, and resources.
Personnel Expectations (i.e., Competence)		• Determine and document key safety related competency requirements for positions identified in safety policy. • Ensure personnel meet and understand the rationale behind the competencies. • Communicate requirements to appropriate curriculum managers.
Training	Formal Training	• Curriculum managers develop, document, deliver, and regularly evaluate formal training to expectations. • Personnel receive training commensurate with their position level, duty assignment, and/or Fleet experience.
	Informal Training	• Develops documents, deliver and regularly evaluate local, informal training for all personnel. • Ensure all hands receive training commensurate with their position level, duty assignment, and/or applicable Fleet experience.
Supervision and Procedures	Supervision	• Communicate critical outputs of the SMS such as lessons learned, results of audits and evaluations, mishap and hazard report (HAZREP) data, rationale behind controls, preventive or corrective actions.

TABLE 3-4 (Cont'd)

Supervision and Procedures	Supervision	• Ensure awareness of the SMS objectives for all personnel. • Provide guidance for sharing of lessons learned and other safety-related information including mishap, hazard, and near-miss information internally and among other commands and communities of interest.
	Awareness	• Ensure distribution of timely and accurate safety marketing, education and awareness information.
	Procedures	• Develop procedures for two-way communication of community, organization, or system safety concerns across the Fleet through established means. • Communicate concerns to higher Echelon commanders and supporting organizations (e.g., Immediate Superior-In-Command (ISIC), Type Commands (TYCOM), Fleet, Regional Support Activity, Systems Command, The Bureau of Naval Personnel, CNET, OPNAV, and/or Office of Personnel Management as applicable).
Organizational Climate	Values and Attitudes	• Promote decisions and actions by all hands that identify hazards and mitigate risks. • Promote a pattern of values and attitudes that result in on and off-duty safety awareness and proactivity. • Establish a culture rooted in the free flow of information. • Establish achievable goals and norms. • Recognize achievement of established goals.
	Assessment	• Conduct regular assessments of organizational climate through visible and accessible processes. • Identify Safe-to-Operate and/or Operate Safely conditions with acknowledgment that humans are the key component of organizational resilience.

CHAPTER 4
PROCEDURES AND REQUIREMENTS FOR AN EFFECTIVE SAFETY MANAGEMENT PLAN

1. Discussion

a. Applicability. SMP is required for Echelon IV and below.

b. Lines of Effort. An effective SMP will leverage the five Lines of Effort (LOE) shown in Figure 4-1 below to optimize safety.

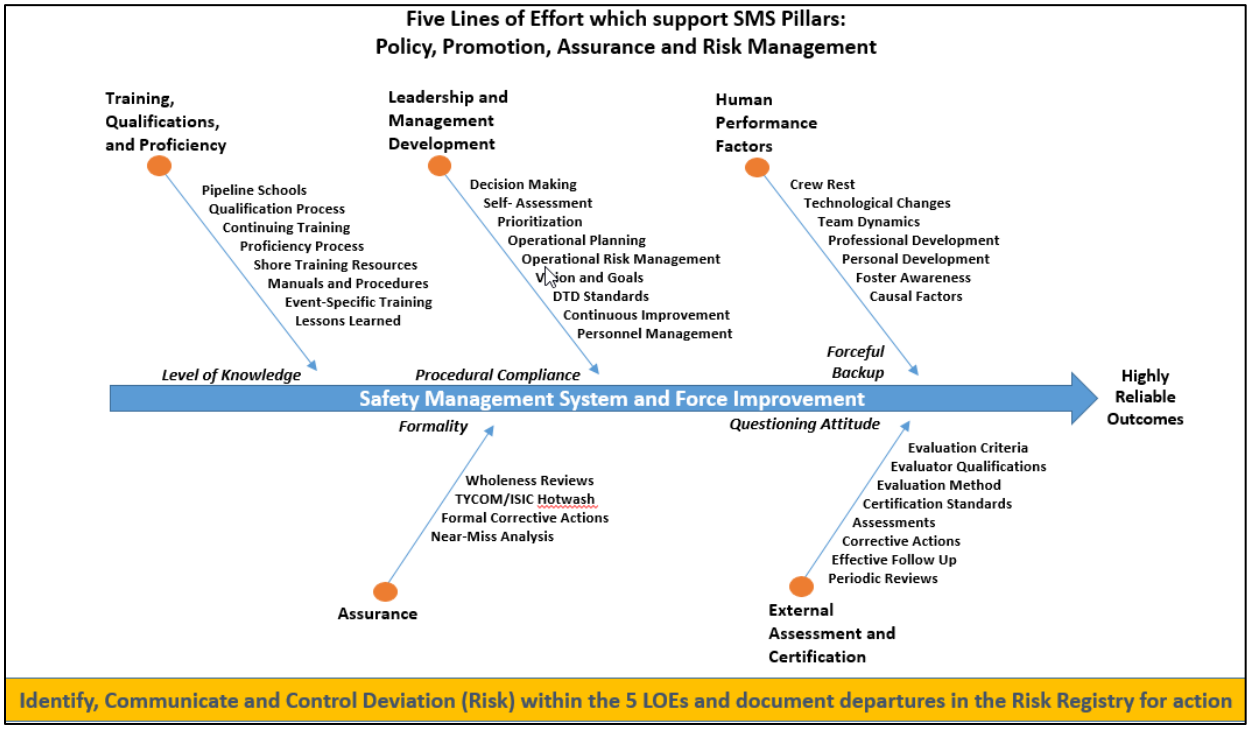

FIGURE 4-1. LINES OF EFFORT

c. Compliance. The SMP must be grounded in procedural compliance and include defense-in-depth/resiliency with annual assessments at the unit level, oversight assessments at the ISIC, TYCOM, Numbered Fleet level, a near miss approach to prevent larger mishap events from occurring, and a focus on operational safety to ensure a continuous improvement. Each command will tailor their SMP to circumstances based on ship, submarine, shore command, et cetera, and the employment of their personnel throughout the operational period.

d. Near-Miss Approach. Processes for near-miss lessons learned management and information sharing are vital elements of an effective SMP. Each command will incorporate near-miss lessons learned and hazard abatement into their SMP to ensure effective learning and prevention of issues of greater severity.

e. Analysis of Post-Event Near Misses and Mishaps. Valid lessons learned require accurate and thorough post-event analysis. All commands will conduct analysis to identify mishaps or near miss problems and causal factors to prevent recurrence as directed by the appropriate AP.

f. SMP Cycle Length. The SMP cycle length is based on the employment and/or assessment cycle for a given command and/or unit. For units that are subject to the OFRP or similar readiness force generation models, the SMP length may correspond to the length of the cycle. Alternatively, commands in extended shipyard availabilities may establish an SMP length based on the availability end date and transition to operations. For commands and/or units not subject to a specific OFRP, the SMP cycle length may be tailored to other operational or administrative inspection or assessment cycles, but should not exceed 3 years. The SMP is a document that will be used throughout the employment cycle to ensure lessons learned after each evolution and as part of the continuous improvement process to prevent mishaps. Each SMP must have quarterly assessments on performance and feedback to ensure continuous improvement is included in the SMP.

g. SMP Assessments. The SMP will cover a finite period, typically defined by cycle length. An annual self-assessment is required to evaluate the SMP and incorporate any lessons learned in an update to the SMP as well as include in the follow-on SMP. Quarterly reviews of the SMP should be conducted to ensure continuous learning throughout the command employment period. SMPs and cumulative lessons learned will be retained for a period of 3 years. Echelon II commanders, Echelon III commanders, and ISICs will review the SMPs at the beginning of an inspection to see how effective the plans have been at incorporating lessons learned and preventing recurrence of near misses, hazards, and mishaps.

h. Risk Register. Per reference (e), the sole official Department of the Navy (DON) web-based database application for safety reporting is Risk RMI. RMI also supports reference (g) by implementing a system of internal controls to provide reasonable assurance that programs achieve intended results; resource use is consistent with the DON mission; programs and resources are protected from mismanagement and reliable and timely information is obtained, maintained, and used for decision-making and reporting. RMI serves as the primary risk register for Echelon II through unit level commands. Supplemental registers (e.g. Singular Reporting and Critique System (SRCP), Jupiter, Integrated Risk Management (IRM), etc.) are used by Echelon III and below commands, tailored to operational or type-specific needs. Additional registers may be required to account for classified events. Regardless of any supplemental or additional registers used, Echelon III and below commands will include an RMI entry for every reportable issue.

i. Internal Controls. Per reference (g), the Fleets are Chief of Naval Operations (CNO) assessable units through the Manager's Internal Controls Program (MICP) as part of the DON IRM strategy. As such, CNO has the responsibility and accountability for establishing and assessing internal controls for USN functions assigned to CNO. This is a risk management function. Implementation of internal controls is the review of operations at each level from the Echelon III all the way down to the unit level to create a list of operations that require risk management review and mitigation to ensure continuous process improvement. If the risk cannot be mitigated at the level of identification, it must be elevated to the next level to ensure proper resources are available (manning, training, and equipment, time and funding) to mitigate the risk until it can be appropriately mitigated to an acceptable level for conducting the identified operations. When identified risk cannot be accepted it will be identified and/or highlighted in the risk register for elevation to the next level for procurement of resources to mitigate the identified risk. An example of risk not being able to be fixed at the ship level is the hook up connections at the pier not able to be utilized by Shore and Fire Emergency Services. When the risk cannot be managed at the current level due to manning, funding, et cetera it will be elevated to the required level within the COC that has the right policy and/or process mitigate the risk to the appropriate level in order to maintain the safety of people, places, property, and material.

j. SMS/SMP Oversight Inspections. Oversight inspections by the Echelon II and Echelon III commands will be conducted at least every 3 years. First and second party auditing assessments are inherent responsibilities to the COC to ensure that they and their subordinates are operating within normal system limits. The ability to identify and correct deviations from the expected standard is paramount to meeting the SMS desired outcomes ("4Ps").

k. Oversight. Inspections must include a review of the current command policies, audit of the command's risk register to include which risk controls are in place for identified risk and what risks were elevated for risk mitigation at the next Echelon. First, second, and third-party audits will be used to assess SMS and/or SMP effectiveness and how lessons learned are incorporated into the next SMP.

l. Elements of an SMP to be used as assessment criteria.

(1) Planned employment over a finite period;

(2) Identify significant risk issues;

(3) Incorporation of risk register;

(a) Record of all operations.

(b) Mitigation of risk to an acceptable level of residual risk to conduct operations or

elevate to the appropriate level to assume the risk.

(c) Identification of hazards associated with operations that need to be elevated for mitigation.

(d) Limited resources to mitigate risk and elevation to next level for mitigation.

(e) Risk reported to appropriate level for resources to mitigate risk.

(f) Resources provided to adjudicate risk.

(g) Operations conducted when appropriate mitigations are in place.

(4) Identify in-progress “check points” to ensure in place mitigations are effective;

(a) Quarterly checks of the plan and incorporation of lessons learned into next quarter.

(b) Risk management with risk register and elevation of risks unable to be mitigated.

(5) Annual review and/or assessment of SMP;

(6) Lessons learned incorporated into the next annual SMP.