

SAFETY DIRECTIVE AND DOCUMENT CREATION AND REVISION

NIST S 7101.16

Document Approval Date: 03/03/2025

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1. PURPOSE

The purpose of this suborder is to define the requirements and associated roles and responsibilities for creating and revising directives and other documents used to establish, implement, or assess the NIST Occupational Health and Safety Management System (OHSMS), the NIST Environmental Management System (EMS), and the documents used as part of Fire and Life Safety (FLS) management at NIST (hereafter collectively referred to as “Safety”).

2. BACKGROUND

Successful management of safety risks at NIST starts with ensuring directives (used to establish policy and/or requirements) and accompanying directives and documents necessary to execute the requirements are thoroughly vetted and approved at various levels within the agency. Further, as gaps, deficiencies, and other opportunities for improvement are identified, these safety directives and documents must be revised appropriately. This suborder will assist the Office of Safety, Health, and Environment (OSHE) in achieving the desired outcomes.

3. APPLICABILITY

- a. The provisions of this suborder apply to directives and accompanying documents used to establish, implement, and assess the NIST OHSMS, EMS, and FLS except as noted in Section 3.b.
- b. The provisions of this suborder do not apply to directives and accompanying documents associated with ionizing radiation safety (please see NIST O 7201.00).

¹ For revision history, see Appendix A.

37 **4. REFERENCES**

38 None.

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41 **5. APPLICABLE NIST DIRECTIVES**

42 a. NIST O 1110.00: [*Directives Management System*](#)

44 b. NIST O 1601.00: [*Records Management*](#)

46 c. NIST O 7101.00: [*Occupational Safety and Health Management System*](#)

48 d. NIST O 7201.00: [*Ionizing Radiation Safety - Radioactive Material and Ionizing-Radiation-Producing Machines*](#)

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51 e. NIST S 7101.15: [*Document and Records Control*](#)

53 f. NIST S 7101.26: [*Workplace Inspection Program*](#)

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56 **6. REQUIREMENTS**

57 a. Creation of Safety Directives Establishing Policy or Requirements

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59 (1) Directives used to establish policies, requirements, roles, and responsibilities shall
60 include the following:

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62 (a) Policy;

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64 (b) Order;

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66 (c) Suborder; and

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68 (d) Notice

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70 (2) These directives shall conform with the requirements of the NIST Directives
71 Management System, specifically NIST O 1110.00 and NIST S 7101.15.

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73 (3) Creating directives identified in Section 6.a(1) shall necessitate development of three
74 drafts that are suitably vetted.

- (a) OSHE Draft – A working draft, written by an OSHE program manager(s) responsible for the subject matter area (hereafter referred to as “OSHE PM”), presented to the Chief Safety Officer (CSO) for consideration.
- i. This draft may be developed directly with customers, other OSHE staff members, and other stakeholders.
 - ii. This draft may be vetted by stakeholders.
 - iii. This draft may be vetted, at the direction of the CSO, by OSHE staff who are not the OSHE PM.
 - iv. The CSO shall approve this draft after conferring with the OSHE PM.
- (b) Safety Advisory Committee (SAC) Draft – A working draft provided to the SAC by the CSO for review and comment.^{2, 3}
- i. The CSO shall provide the following to the SAC Chair with a request to disseminate for review and comment:
 - (i) Draft document; and
 - (ii) Comment template (please see Appendix B).
 - ii. The review and comment period shall be determined by the CSO based upon factors such as complexity of the information, length of the document, needs of the organization for the requirements or guidance, *etc.* Typically, this period is two to three weeks.
 - iii. The SAC Chair shall be responsible for distributing the draft to all SAC members.
 - iv. SAC members shall distribute the draft for review to OU staff who may be affected by the requirements or roles and responsibilities of the directive to the extent practical and appropriate to ensure adequate review and to provide staff an opportunity to participate in the development of NIST's OHSMS.

² In some cases, the subject matter area may only affect a finite population and the CSO may opt to send this draft directly to the specifically affected SAC stakeholders for review and comment (with notification sent to the SAC Chair).

³ In some cases, the CSO may determine that other stakeholders outside of the SAC would benefit from review of the directive and the CSO shall separately send the draft directly to those identified for review and comment.

NOTE: Those reviewing the directive during the SAC Review should focus on a technical assessment of the requirements as well as the associated roles and responsibilities. Questions regarding implementation should be reserved for the deployment stage.

- v. The SAC Chair shall submit a compiled list of all comments using the comment template to the CSO on or before the due date.
- vi. The CSO shall provide the OSHE PM with the SAC comments.
- vii. The OSHE PM shall review the comments and reach out directly to a specific commenter, as necessary, for clarification and/or discussion.
- viii. The OSHE PM shall provide responses to each comment using the comment template indicating that the comment was either:
 - (i) Accepted and, as necessary, how the draft was edited in “track changes” as a result; or
 - (ii) Not accepted and provide a rationale for why.
- ix. The CSO shall approve the responses and subsequent changes to the draft document after conferring with the OSHE PM.
- x. The CSO shall provide the approved, revised document and comment template to the SAC Chair.
 - (i) The CSO may communicate with the individual commenters.
 - (ii) The CSO shall provide a 1-week period in which individual commenters can provide feedback on how their comment was addressed.

NOTE: Should additional changes to the document be required as a result of these discussions, the CSO will inform the SAC.

- (c) Executive Safety Committee (ESC) Draft – A working draft provided to the ESC by the CSO for review and comment.⁴

⁴ In some cases, the subject matter area may only affect a finite population and the CSO may opt to send this draft directly to those ESC stakeholders for review and comment.

- i. The CSO shall provide the following to ESC Members with a request to review and comment:
 - (i) Draft document; and
 - (ii) Comment template (please see Appendix B).
- ii. The review and comment period shall be determined by the CSO based upon factors such as complexity of the information, length of the document, needs of the organization for the requirements or guidance, *etc.* Typically, this period is two to three weeks.
- iii. ESC Members shall submit comments using the comment template to the CSO on or before the due date.

NOTE: Given OU representatives provided a technical assessment of the requirements during the SAC Review, ESC comments should be higher-level focusing on overall policy decisions and associated roles and responsibilities.
- iv. The CSO shall provide the OSHE PM with the ESC comments.
- v. The OSHE PM shall provide responses to each comment using the comment template indicating that the comment was either:
 - (i) Accepted and, as necessary, how the draft was edited in “track changes” as a result;
 - (ii) Not accepted and provide a rationale for why; or
 - (iii) Recommended for the CSO to reach out directly to a specific commenter for clarification and/or discussion.
- vi. The CSO shall approve the responses and subsequent changes to the draft document after conferring with the OSHE PM.
- vii. The CSO shall provide the revised document and comment template to ESC members.

- (i) The CSO shall provide a 1-week period in which individual commenters can provide feedback on how their comment was addressed.

NOTE: Should additional changes to the document be required as a result of these discussions, the CSO will inform the ESC.

viii. The CSO shall request ESC members respond with one of the following:

- (i) Concur;
- (ii) Concur with comments; or
- (iii) Do not concur with comments.

This response period shall be a minimum of 1 week.

ix. After the response period, the CSO shall either:

- (i) Approve the document as a final directive with appropriate approval date; or
- (ii) Work with non-concurring ESC members to resolve their concerns.
- If resolving these concerns results in a substantive change(s), the CSO shall resend the document and comment template to ESC members (Section 6.a(3)(c)vii) and request concurrence (Section 6.a(3)(c)viii).

(4) Prior to publishing the “final” version of the directive in the Documents and Records Center, the Program Manager for NIST S 7101.15 shall perform a quality control check to ensure conformance with the requirements of that suborder.

b. Creation of Safety Directives and Documents to Assist in Implementing or Assessing Requirements

(1) Directives and documents used to assist in implementing or assessing requirements shall include, but not be limited to, the following:

- (a) Deployment plan;

- (b) Deployment briefing presentation;
- (c) Training materials;
- (d) OU self-assessment checklist;
- (e) Question sets associated with NIST S 7101.26 (when applicable);
- (f) Procedures (as necessary);
- (g) Guidance (as necessary);
- (h) Forms (when applicable); and
- (i) Permits (when applicable).

(2) Creation of all directives and documents listed in Section 6.b(1) shall consist of two drafts that are suitably vetted.

(a) OSHE Draft – A working draft presented to the CSO by the OSHE PM for consideration.

- i. This draft may be developed directly with customers, other OSHE staff members, and other stakeholders.
- ii. This draft may be vetted by stakeholders.
- iii. This draft may be vetted, at the direction of the CSO, by OSHE staff who are not the OSHE PM.
- iv. The CSO shall approve this draft after conferring with the OSHE PM.

(b) SAC Draft – A working draft provided to the SAC by the CSO for review and comment.

- i. The CSO shall provide the following to the SAC Chair with a request to disseminate for review and comment:
 - (i) Draft document; and

- (ii) Comment template (please see Appendix B).
- ii. The SAC Chair shall be responsible for distributing the draft to all SAC members.
 - (i) SAC members shall distribute the draft for review to their OU staff to the extent practical and appropriate to ensure adequate review and to provide staff an opportunity to participate in the development of NIST's OHSMS.
- iii. The review and comment period shall be determined by the CSO based upon factors such as complexity of the information, length of the document(s), number of documents, needs of the organization for the requirements or guidance, *etc.* Typically, this period is 3 weeks.
- iv. The SAC Chair shall submit a compiled list of all comments using the comment template to the CSO on or before the due date.
- v. The CSO shall provide the OSHE PM with the SAC comments.
- vi. The OSHE PM shall review the comments and reach out directly to a specific commenter, as necessary, for clarification.
- vii. The OSHE PM shall provide responses to each comment using the comment template indicating that the comment was either:
 - (i) Accepted and, as necessary, how the draft was edited in “track changes” as a result; or
 - (ii) Not accepted and provide a rationale for why.
- viii. The CSO shall approve the responses and subsequent changes to the draft tool after conferring with the OSHE PM.
- ix. The CSO shall provide the approved, revised tools and comment template to the SAC Chair.
 - (i) The CSO may communicate with the individual commenters.

- (ii) The CSO shall provide a 1-week period in which individual commenters can provide feedback on how their comment was addressed.

NOTE: Should additional changes to the document be required as a result of these discussions, the CSO will inform the SAC.

- x. The CSO shall subsequently approve the tools as final.

- (3) The CSO shall make the determination if internal OSHE Procedures that describe how OSHE shall conduct its program roles and responsibilities (*e.g.*, industrial hygiene procedures) require the SAC review as described in Section 6.b(2)(b).

- (4) Prior to publishing the “final” version of the directive or other document in the Documents and Records Center, the Program Manager for NIST S 7101.15 shall perform a quality control check to ensure conformance with the requirements of that suborder.

c. Deployment of a Safety Directive

- (1) Deployment of a safety directive shall occur via a deployment briefing once the directive and all other directives (*e.g.*, procedures, guidance, forms) and documents required to assist in implementing or assessing requirements are approved by the CSO.

- (2) A communication regarding the deployment briefing shall be sent to relevant parties (*e.g.*, OU Safety Coordinators, OU Safety Program Coordinators) at least two weeks in advance of the briefing.

- (3) The deployment briefing shall be provided by the OSHE PM.

- (4) At the deployment briefing, the OSHE PM shall review the deployment briefing presentation, any relevant directives and documents required to assist in implementing or assessing requirements, and field questions from attendees.

- (a) The OSHE PM shall provide additional assistance regarding deployment as requested.

d. Establishment of Effective Date

- (1) The CSO shall obtain concurrence from the ESC regarding the effective date of a safety directive.

(2) The effective date should be communicated to stakeholders during the deployment briefing.

(3) The effective date ends the deployment phase of a safety directive.

e. Revision of Safety Directives Establishing Policy or Requirements (Policy, Orders, Suborders, and Notices)

(1) Revision of a directive may be initiated by any number of activities or events, including, but not limited to, the results of audits, assessments, incident investigations, and changes in federal, state, or local regulations.

(2) Administrative Revision (revision which does not affect a requirement, role, or responsibility of the directive)

(a) Administrative revisions:

i. Shall be made on the currently approved document using “track changes” mode; and

ii. May have a comment describing why the change was required.

(b) Administrative revisions shall be concurred by the DCSO, with notification to the CSO.

(c) Administrative revisions shall not require a new version of the document.

(d) Administrative revisions shall be documented in the Revision History of the document as “Administrative Revision” in the column indicating “Revision”.

(e) The CSO shall determine if notifications are required to the ESC and/or appropriate customers and stakeholders.

(3) OSHE-Impacted Revision (revision which will affect a requirement, role, or responsibility for OSHE as an organization or OSHE staff member(s) in performance of their official duties, but will not change requirements, roles, or responsibilities for non-OSHE NIST staff)

(a) OSHE-impacted revisions:

- 388 i. Shall be made on the currently approved document using “track changes”
389 mode; and
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391 ii. May have a comment describing why the change was required.
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393 (b) OSHE-impacted revisions shall be:
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395 i. Concurred by the DCSO; and
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397 ii. Approved by the CSO.
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399 (c) OSHE-impacted revisions shall require a new version of the document.
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401 (d) OSHE-impacted revisions shall be documented in the Revision History.
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403 (e) The CSO shall determine if notifications are required to the ESC and/or appropriate
404 customers and stakeholders.
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406 (4) NIST-Impacted Revision (revision which will affect a requirement, role, or responsibility
407 for a non-OSHE NIST staff member)
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409 (a) NIST-impacted revisions shall:
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411 i. Be made on the currently approved document using “track changes” mode;
412 and
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414 ii. Have a comment describing why the change was required.
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416 (b) To ensure a level of vetting is commensurate with the impact of the change, the CSO
417 shall determine if the revisions are “minor” or “major”.
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419 NOTE: The CSO shall consider the scope and complexity of the change(s) and
420 whether the change(s) should be reviewed in the context of the full suborder when
421 determining whether the revision is considered “minor” or “major”.
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423 i. Minor revisions shall require the full vetting process as found in Section
424 6.a(3), but:
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426 (i) Shall be limited to review of only the changes; and
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- (ii) May have the review timeframes truncated, allowing timeframes commensurate with the scope of the change, determined by the CSO.
- ii. Major revisions shall require the full vetting process as found in Section 6.a(3).
- (c) NIST-impacted revisions shall require a new version of the document.
- (d) NIST-impacted revisions shall be documented in the Revision History.
- (e) The CSO shall notify NIST appropriate staff (e.g., ESC, customers, stakeholders) of this revision.
- (5) Prior to publishing the “final” version of the directive or other document in the Documents and Records Center, the Program Manager for NIST S 7101.15 shall perform a quality control check to ensure conformance with the requirements of that suborder.
- f. Revision of Safety Directives and Documents to Assist in Implementing or Assessing Requirements
- (1) Revision of directives and documents to assist in implementing or assessing requirements shall follow the same process as indicated for revision of directives establishing policy or requirements, Section 6.e. with the exception of the vetting process following the steps delineated in Section 6.b(2) as opposed to Section 6.a(3).
- h. Re-deployment of Revised Directives
- The CSO shall determine the extent of the process required for re-deployment of a revised safety directive which may include requirements of Section 6.c of this document.
- i. Training
- There is no specific training related to this suborder.
- j. Records Required by this Suborder
- The following records shall be kept and maintained in accordance with NIST S 7101.15:
- (1) OSHE Draft of directives – Section 6.a(3)(a);
- (2) SAC Draft of directives – Section 6.a(3)(b);
- (3) ESC Draft of directives – Section 6.a(3)(c);

(4) OSHE Draft of directives and documents used to assist in implementing or assessing requirements – Section 6.b(2)(a);

(5) SAC Draft of directives and documents used to assist in implementing or assessing requirements – Section 6.b(2)(b);

(6) Documentation of comments and responses to those comments, *i.e.*, comment templates related to Section 6.j(1) to Section 6.j(5); and

(7) Documentation pertaining to OU concurrence of the directive.

7. DEFINITIONS

Definitions common to all NIST OSH suborders can be found in Section 6 of NIST O 7101.00. The definitions specific to this suborder are as follows:

- a. Administrative Revision – A revision which does not affect a requirement, role, or responsibility of the directive. Examples include, but are not limited to:
 - Spelling corrections; or
 - Fixing of formatting issues or hyperlinks.
- b. Approval Date – The date the CSO official approves the safety directive document.
- c. Deployment/Re-deployment – The process of NIST officially requiring OUs to begin working to meet the requirements of a safety directive.
- d. Deployment Briefing – A presentation used to deploy a safety directive which typically contains critical information regarding important requirements and associated roles and responsibilities.
- e. Deployment Plan – A document that provides information on and outlines the steps necessary to effectively deploy a safety directive.
- f. Effective Date – The date the OUs shall have all requirements of a safety directive fully implemented.
- g. NIST-Impacted Revision – A revision which will change a requirement, role, or responsibility for a non-OSHE NIST staff member. Examples include, but are not limited to:
 - Adding, modifying, or deleting a requirement affecting a non-OSHE staff member;

- Adding, modifying, or deleting a role or responsibility for a non-OSHE NIST staff member; and
- Comprehensively modifying the directive resulting from regular reviews and benchmarking studies

- h. OSHE-Impacted Revision – A revision which will change a requirement, role, or responsibility for OSHE as an organization or OSHE staff member(s) in performance of their official duties, but will not change requirements, roles, or responsibilities for non-OSHE NIST staff. Examples include, but are not limited to:
 - Requiring an OSHE staff member to use a specific procedure to conduct an assessment; or
 - Assigning a new role to the CSO.
- i. OU Self-Assessment Checklist – A checklist associated with deployment of a safety directive which can be used to assess an OU's implementation of the directive requirements.
- j. Question Set Associated with NIST S 7101.26 – A checklist which can be used to assess the implementation of a safety directive's requirements in a given location after it is effective.

7. ACRONYMS

Acronyms common to all NIST OSH suborders can be found in Section 7 of NIST O 7101.00. The acronyms specific to this suborder are as follows:

- a. CSO – Chief Safety Officer
- b. DCSO – Deputy Chief Safety Officer
- c. EMS – Environmental Management System
- d. ESC – Executive Safety Committee
- e. FLS – Fire and Life Safety
- f. OHSMS – Occupational Health and Safety Management System
- g. OSHE – Office of Safety, Health, and Environment
- h. OU – Organizational Unit

- i. PM – Program Manager
- j. SAC – Safety Advisory Committee

8. RESPONSIBILITIES

Roles and responsibilities common to all NIST OSH suborders can be found in Section 8 of NIST O 7101.00. The roles and responsibilities specific to this suborder are as follows:

- a. The CSO is responsible for overall implementation of this suborder and may delegate specific tasks to the Deputy CSO.
- b. The Deputy CSO is responsible for overseeing implementation of this suborder.
- c. The OSHE PM is responsible for:
 - (1) Creating the first draft of the directive establishing policy or requirements;
 - (2) Creating the first draft of the associated directives and documents used to assist in implementing or assessing requirements;
 - (3) Working with all parties to address feedback or comments on directives and tools at any time in the process; and
 - (4) Participating in the deployment or re-deployment process.
- d. The Program Manager for NIST S 7101.15 is responsible for ensuring appropriate documents conform to the requirements of the Documents and Records Control suborder.
- e. The SAC Chair is responsible for coordinating all SAC Reviews of documents.
- f. SAC Members are responsible for, when applicable:
 - (1) Coordinating all SAC Reviews of documents within their OU; and
 - (2) Ensuring OU staff who may be affected by the directive are offered the opportunity to participate in the review process.

g. ESC Members are responsible for:

(1) Providing a high-level review of the documents focusing on overall policy decisions and associated roles and responsibilities during the “ESC Review”; and

(2) Voting for or against concurrence on the final draft of a document as requested by the CSO.

9. AUTHORITIES

There are no authorities specific to this suborder alone. For authorities applicable to all NIST OSH suborders, see section 9 of NIST O 7101.00.

10. DIRECTIVE OWNER

Chief Safety Officer

11. APPENDICES

A. Revision History

B. Example of Safety Suborder and Tool Comment Template

Appendix A. Revision History

Version No.	Approval Date of Revision	Effective Date for Revision	Brief Description of Change; Rationale
1	03/03/2025	03/03/2025	<ul style="list-style-type: none"> None – Initial document

Appendix B. Example of Safety Suborder and Tool Comment Template

Suborder/ Tool	NIST X 7X01.XX: Subject matter			Comments to Chief Safety Officer by DATE	
Draft	XXX Review				
Comment #	Commenter			Comment	OSHE Response
	Name	Division	Page/Slide #		