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UNITED STATES GENERAL ACCOUNTING OFFICE WASHINGTON, D.C. 20548

FEDERAL PERSONNEL AND COMPENSATION DIVISION

OCTOBER 22, 1980

B-200949



The Honorable Mario Biaggi House of Representatives

Dear Mr. Biaggi:

Subject: Adequacy of Safety Procedures at Fort A.P. Hill and National Guard Training Facilities (FPCD-81-16)

In your letter of June 3, 1980, you requested that we inquire into National Guard safety programs. More specifically, you asked that we conduct an investigation of the following at Fort A.P. Hill, Virginia, because of the deaths of two National Guardsmen which occurred while their units were training at this facility.

- --Whether safety procedures are adequate.
- --The extent to which safety procedures are followed and enforced at Fort A.P. Hill.
- --Whether any previous accidents involving fatalities or serious injuries have occurred at Fort A.P. Hill.

Subsequent discussions with your office indicated we should determine whether the two deaths at Fort A.P. Hill might be indicative of safety problems throughout the National Guard.

In our opinion, the safety procedures of the National Guard are equal to those of the Active Army. Moreover, the District of Columbia and Virginia National Guard safety procedures are further supplemented with separate procedures for individual training activities. The enforcement of safety procedures at Fort A.P. Hill is the responsibility of the units being trained, in this case, District of Columbia and Virginia Guard units. Accident investigation reports indicate that those units either did not enforce and/or did not follow established safety procedures in the two fatal accidents at Fort A.P. Hill. The Commanding General of the District of

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Columbia Guard recommended disciplinary action for those not following established procedures. In the case involving the Virginia Guard unit no punitive action was taken. Only one other fatality occurred in the recent past at Fort A.P. Hill and did not involve a National Guard unit.

The records show that the National Guard accident rate exceeds that of the Active Army and the rate for disabling accidents greatly exceeds the Active Army rate. Since we only looked at two examples involving accidents, we are unable to conclusively state the extent to which the higher accident rates in the National Guard may or may not be caused by failure to follow and/or enforce safety procedures.

In performing our review, we compared safety procedures for the Active Army with those of the National Guard Bureau as well as those of the District of Columbia and Virginia National Guard. We compared data on accident rates and disabling accidents from the Active Army and the National Guard. We examined the case files for each of the two fatal accidents at Fort A.P. Hill. We visited Fort A.P. Hill, the National Guard Bureau, Army National Guard Safety Office, the District of Columbia National Guard, the Virginia National Guard, and the Army Safety Division. We also obtained statistical information from the Army Safety Center, Ft. Rucker, Alabama. Because our review involved only two accidents, which may not be typical, findings may not be extrapolated to the universe of National Guard accidents.

WHETHER SAFETY PROCEDURES ARE ADEQUATE

National Guard safety regulations emanate from Army Regulation 385-10 which establishes the Army's safety programs. The Army regulation is applicable to all commands, installations, activities, and units of the Army, including the Army National Guard and U.S. Army Reserve. It states that "accident prevention is a command responsibility. Commanders must ensure compliance with the safety program and establish necessary additional requirements to ensure the safety of personnel under their control." The regulations prescribe policies, procedures, and guidelines for implementing the safety of the program. The National Guard Regulation includes all features of the Army safety regulations. The District of Columbia and Virginia National Guard regulations incorporate the Guard Bureau's regulations, and individual unit regulations and operating procedures further emphasize safety.

Based on our limited review, the regulations and procedures at the National Guard level appear adequate for implementing the Army's safety program. We are not in a position to comment on regulations and procedures at each state or individual unit level for other than the Virginia and District of Columbia National Guard and the two units involved in the fatal accidents. In Virginia and the District of Columbia, the safety regulations and procedures implement the National Guard Safety Program. These safety regulations and/or procedures include the basic features of the National Guard safety program and, in the case of the two units we investigated, were supplemented with specific safety procedures for the training functions. For the specific accidents investigated, the units did not enforce and/or follow established safety procedures during training activities.

The National Guard's Safety Branch, in conjunction with the U.S. Army Safety Center, is designing a safety training course for unit safety officers and Noncommissioned Officers (NCOs). This course will emphasize, among other things:

- --Safety responsibilities.
- -- Accident prevention.
- --Safety education.
- -- Convoy operations.
- -- Defensive driving techniques.

The purpose of this training will be to provide National Guard unit safety personnel with the basic know-ledge to conduct an effective accident prevention program. This program is tailored especially for the Guard because the Active Army does not have a unit level safety officer training course. This program is designed to cover annual training and individual training (weekend), a unique feature in the Guard.

At Fort A.P. Hill, a comprehensive safety program for units using the training facility exists. The program is designed to make using units aware of safety hazards that exist on the post. Every year prior to annual training, each unit scheduled for training sends a representative to Fort A.P. Hill for a safety conference and briefing.

The units are also briefed the day they arrive for training by the post safety officer and again by the safety NCO the morning before training begins. Primary enforcement of safety lies with the units and, while at Fort A.P. Hill, they must report all accidents to the base safety office. Fort A.P. Hill safety office's responsibility is to monitor visiting units and report accidents to higher headquarters. Each National Guard unit visiting Fort A.P. Hill is responsible for following and enforcing individual unit safety procedures as well as safety procedures for all military activities at Fort A.P. Hill.

Regarding the specific inquiry at Fort A.P. Hill, we believe the regulations and safety operating procedures for the National Guard training activities were adequate and if they had been followed the accidents might have been prevented.

EXTENT TO WHICH SAFETY PROCEDURES ARE FOLLOWED AND ENFORCED AT FORT A.P. HILL

In our opinion, the two accidents at Fort A.P. Hill can be directly related to individual unit safety procedures and failure to follow or adequately enforce such procedures.

In the first incident, the accident investigation file shows that an unoccupied 2-1/2 ton truck veered into two tents in which National Guard personnel were sleeping and resulted in one death and six injuries. The vehicle had been improperly parked in the billeting area and was started by a Guardsman standing outside the vehicle. The accident report shows that basic safety procedures and precautions were not followed. There was a specific unit operating procedure for the training exercise prohibiting the parking of vehicles in the billeting area when not in use. In addition to the truck being parked in a prohibited area, it was not secured according to National Guard operating procedures. It had been parked in gear without securing the hand brake and remained in the billeting area throughout the night. Additional safety procedures were not followed when a Guardsman failed to observe the proper safety precautions for starting a vehicle. It seems evident that the company level command personnel, by allowing several safety procedures

to be violated, did not enforce or follow procedures necessary for conducting a safe training exercise 1/.

Information in the investigation file for the second accident showed a Virginia Guardsman was operating a front-end loader and lost control of the vehicle, causing it to roll over and resulting in one fatality and injuring a passenger. In this incident, the operator failed to follow proper operating procedures, i.e., (1) operate at a safe rate of speed, (2) maintain proper tire pressure, (3) prevent unauthorized passenger on vehicle, and (4) failure to shift to lower range when moving down steep incline. This was also a situation where the command level allowed a vehicle to operate in a manner not complying with the operating manual. Enforcing safety procedures could have gone a long way toward preventing this accident.

WHETHER ANY PREVIOUS ACCIDENTS INVOLVING FATALITIES OR SERIOUS INJURIES HAVE OCCURRED AT FORT A.P. HILL

Records were not available at Fort A.P. Hill for all serious accidents that had occurred there. However, according to the safety officer, only one other accident involving a death had occurred at Fort A.P. Hill in the past 8 years. This happened in 1978 when an active duty sergeant on temporary duty at Fort A.P. Hill overturned a military pickup truck, killing himself and injuring a passenger. The investigative report revealed alcohol and speeding were involved.

STATISTICS INDICATE SAFETY PROBLEM THROUGHOUT THE NATIONAL GUARD

Information obtained on fatalities and comparative accident rates suggest that safety is a matter on which the National Guard should take corrective action.

This same Guard unit more recently had another accident involving four quarter-ton jeeps and resulting in injuries to seven Guardsmen. While the final report on this latest accident has not been completed, failure to follow safety procedures is at issue because preliminary indications are that contributing causes were (1) excessive speed for conditions and (2) poor judgment to maintain a safe distance on the part of two drivers.

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The number of fatalities from surface accidents have generally declined in the National Guard over the last 3 years as follows.

Year	No. Fatalities
1977	45
1978	24
1979	26

Since January 1980, a total of 12 accident-related deaths have occurred in the National Guard in 11 different states, including the 2 at Fort A.P. Hill. Nine of these fatalities involved National Guard vehicles. The other three occurred while the Guardsmen were off duty.

Despite this reduction in deaths, the National Guard rates for both accidents and disabling injuries remain higher than those of the Active Army and Army Reserve.

	Army National Guard	Active <u>Army</u>	Army Reserve
Accident Rate $\underline{a}/$	74.2	51.0	<u>c</u> /
Disabling Injuries $\underline{b}/$ - Military Personnel	57.1	30.8	18.4
Civilian Personnel	44.7	38.1	<u>c</u> /

- a/ Number of accidents per million staff-days.
- b/ Number of disabling injuries per million staff-days. Disabling injury is where a person would have one or more days away from work.
- c/ Data not available.

As this data illustrates, the National Guard has a disabling injury rate from accidents nearly twice as high as the Active Army and over three times greater than the Army Reserve. During fiscal year 1979, these accidents resulted in over 23,000 days of lost time for National Guard personnel, a loss of 597 staff-years of training.

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Regarding these statistics, however, National Guard Bureau safety officials estimate that 40 to 50 percent of National Guard accidents are not reported to the Bureau as required by regulations. One major reason for this may be that Army Regulation 385-40, "Accident Reporting and Records," has been in draft manuscript since January 1978. Even though in draft, it was distributed to all National Guard units with instructions "...for use by commanders and unit safety officers in accident reports and OSHA records required during individual training and annual training." However, we found that at the two locations we visited (Virginia and District of Columbia) there was no strong emphasis on the use of the regulation since it was in draft. We were advised that issuance of this regulation is imminent.

This reporting problem is apparently not limited to the National Guard. We determined from the Active Army safety office that they sampled 6 Army divisions in 1978 and determined 40 to 70 percent of the accidents in those divisions were not being reported.

We also have concluded that the Army Safety Center does not receive accident reports from the National Guard in a very timely manner, and the accuracy of information received appears questionable. This is important since such information formulates the basis for the safety center to strengthen its accident prevention program. The Safety Center analyzes accident statistics and publishes a monthly report stressing accident trends and preventive measures. While serious accidents and accidents involving fatalities are generally reported, we were informed by National Guard safety officials that less serious accidents not involving fatalities may not be reported because safety personnel are not properly trained in the use of reporting procedures or commanders, fearing poor safety records, fail to report them. As a result, the Army Safety Center may not have sufficient information to properly implement its accident prevention program.

In summary, we believe that the National Guard has a greater safety problem, particularly in disabling accidents, than does the Active Army. For the two accidents which we investigated, the cause was failure to follow and enforce existing regulations and procedures.

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Because of the consequences of the above accidents and the higher rates, we believe the National Guard Bureau should determine the cause for its higher accident and disabling injury rates and take corrective action. You may wish to follow through on this matter directly with the National Guard Bureau.

We have discussed the contents of this report with the National Guard Bureau and apprised them of our concerns about the higher accident rates and the two units not following and enforcing safety procedures. They agreed to look into these matters.

We are sending copies of this report to the National Guard Bureau and to the House and Senate Committees on Armed Services and Appropriations. We are also making copies available for public distribution to interested parties.

If we can be of further assistance to you, please do not hesitate to contact us.

Sincerely yours,

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H. L. Krieger Director