Guidance on Appointment of Institutional Safety Discipline Leads

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NASA NPR 8715.1B, NASA Safety & Health Programs, outlines requirements that relate to the appointment of Institutional Safety Discipline Leads (ISDLs) to support the Institutional Safety Authorities (ISA). They are provided herein to serve as guidance to center senior leadership in understanding and meeting the intent of the delegation and execution of Institutional Safety Authority as described in the NPR.

Part A: Excerpts that Apply Generally to all ISDL Positions

Each Center Director is responsible for designating qualified civil servants as Center Institutional Safety Discipline Leads to manage safety policies and programs in specific discipline areas and to oversee their implementation. (NPR 8715.1B § 2.4.1)

This requirement identifies the Center Director as the ultimate authority who can delegate Institutional Safety Discipline Leads. This is intending that the basis for appointment of ISDL’s stems from the Center Director’s Institutional Safety Authority (defined in NPD 1000.0). Consequently, if the Center Director explicitly shares the Institutional Safety Authority with the SMA Director, they may also share in the ability to appoint ISDL’s. However, the authority to appoint an ISDL cannot be otherwise delegated to other center management as those managers are outside the envelope of ISA. Note that, once appointed, an ISDL has a reporting and supporting relationship with the SMA Director. It then follows that the SMA Director may share in appointing authority.

In case of disagreement with determinations by Institutional Safety Discipline Leads, organizations may appeal such determinations to the SMA Director or Center Director. (NPR 8715.1B § 3.1.2.3)

Regardless of the organization in which Institutional Safety Discipline Leads reside, Centers shall maintain independent communication paths between those leads and the SMA Director, then to the Center Director, to avoid undue influence on their functioning. (NPR 8715.1B § 3.1.2.5)

These two requirements both speak to the supporting relationship between an ISDL and an SMA Director. They are included here to underscore the relationship between the ISDL and SMA Director’s office. An ISDL may be appointed within another organization outside of SMA. However, all reporting, appealing and surveillance of that role belongs to the SMA Director’s office. The appointee’s line management is not involved in any of the execution of safety and health requirements and their related authority.

Center Institutional Safety Discipline Leads are inherently governmental functions and may only be performed by civil servants. They may be supported by contractors. ... (NPR 8715.1B § 2.6.1)

This requirement clarifies that a civil servant must be appointed in any ISDL role. Contractors may support those roles, but cannot serve officially in their capacity. It is important to note that, due to the extensive range of topics managed by an ISDL, contractor support is often needed. It may be largely recognized that support personnel assist the office of the ISDL. However, they cannot serve in their place. If an ISDL is not appointed for a particular area, or is otherwise unavailable,
official positions and decisions of the ISDL office revert to the SMA Director until such time as the ISDL becomes available or is newly appointed.

*Center Directors may designate additional Institutional Safety Discipline Leads not defined in this document according to their needs.* (NPR 8715.1B § 2.6.2)

This requirement allows for flexibilities in center missions, culture, workload and available expertise. One example may be appointment of a coordinated set of ISDLs for fire protection to handle the complexity and workload at a large center. There may be a need for multiple fire protection related ISDL’s with well-defined coordination and limitations on the extent of their respective scopes. One ISDL/AHJ addresses STD 8719.11B, Appendix B requirements related to fire operations, prevention, and investigation activities and a second AHJ addresses all other fire protection and life safety issues remaining in STD 8719.11B which relate to design planning, facilities, testing and systems integration. The ability for the center to appoint additional ISDLs would allow for the appointment of a fire service operations AHJ (who may be titled by center preference, i.e. fire marshal, etc.) and a regular AHJ, for lack of a better reference.

Similarly, additional ISDL’s need not be tied to an existing ISDL. For example, the Ames Research Center has established a building department, complete with a Building Official who enforces the building code and its referenced standards. This authority is highly coordinated with ISDLs of adjacent scope (i.e. fire, pressure systems, etc.). This Building Official might be a candidate for ISDL appointment and recognition if so chosen and coordinated by the Center Director and both the SMA and Facilities Engineering organizations due to a potential or perceived overlap in institutional authority types.

**Part B: Excerpts that Apply to a Specific ISDL Position**

The following excerpts are from Chapter 5 and apply specifically to the appointment of the Fire Protection Authority Having Jurisdiction:

The AHJ shall have the following qualifications:

a. Leadership and managerial experience at a proven level commensurate with the expectations of the AHJ position and one of the following designations and certifications:

(1) Registered professional engineer who has passed the fire protection engineering written examination administered by the National Council of Examiners for Engineering and Surveying (NCEES) and has a minimum of eight years of work experience directly related to fire safety, building safety, life safety, and related code compliance.

(2) Registered professional engineer in a related field with a minimum of ten years documented work experience directly related to fire safety, building safety, life safety, and related code compliance.

(3) Certified Safety Professional along with certification as either an International Code Council Certified Building Official or NFPA Certified Fire Protection Specialist
with ten years documented work experience directly related to fire safety, building safety, life safety, and related code compliance.

(4) Fire Service Professional meeting all requirements of NFPA 1037, Standard on Professional Qualifications for Fire Marshal, with a minimum of ten years documented work experience directly related to fire safety, building safety, life safety, and related code compliance.

b. Work experience directly related to fire safety, building safety, life safety, and related code compliance including multi-faceted experience with significant work in each of the following three major areas:

(1) Risk management, decision analysis, and communication of complex technical issues.

(2) Building construction, code enforcement, life safety and means of egress systems, fire control and suppression systems, fire detection and alarm systems, building tenability systems, building fire resistance, electrical systems, lightning protection systems, conveyance systems, and other building systems and facility infrastructure relating to fire hazards in the workplace.

(3) Hazardous materials control, manual fire response and suppression, facility loss prevention control practices, ignition source controls, inspection, testing, and maintenance of protective systems, fire investigation procedures, and related fire prevention best practices.

(NPR 8715.1B § 5.5.1)

This section addresses the expected qualifications of the person who serves as an AHJ for the center’s fire protection program. It represents what was envisioned by the authors of NASA STD 8719.11 relative to the qualifications needed to execute the scope of requirements within it. The Center Director and SMA Director have some, though limited, flexibility in interpreting these requirements since they are so specific. It is recommended that if an individual outside of the listed qualifications is to be appointed that the center contact the OSMA Discipline Program Executive for Fire Protection for assistance in getting clarifying information regarding the intent of these qualifications and to document any alternative arrangements which meet the intent of the original qualifications.

Please contact the Institutional Safety Management Division at the Office of Safety and Mission Assurance if you need any additional information regarding NASA NPR 8715.1B.

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