

117th Congress
Occupational Safety and Health Inspections



**BIENNIAL
REPORT**

July 2025





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MESSAGE FROM THE GENERAL COUNSEL

Under the Congressional Accountability Act of 1995, the General Counsel of the Office of Congressional Workplace Rights (OCWR) is required to conduct occupational safety and health (OSH) inspections of legislative branch facilities during each Congress and report the results of these inspections to Congress. I am pleased to submit this report summarizing the results of the OSH inspections and investigations conducted during the 117th Congress.

This will be the last report regarding OSH inspections and investigations that I will be submitting to Congress, since I will be retiring this year. Shortly after I started working at the OCWR (then called the Office of Compliance), we issued the Report on Occupational Safety and Health Inspections for the 110th Congress, which reported 9,248 health and safety hazards—a significant decline from the 13,140 hazard findings reported for the 109th Congress, but still an alarmingly high number. In comparison, this report shows 2,105 hazard findings identified during the 117th Congress. While 2,105 findings are still too many, we have unquestionably made tremendous progress during the past 16 years.

Much of this progress has been due to the hard work of many people, including supervisors, trainers, maintenance staff, and safety and health professionals throughout the Capitol complex. Also contributing to this progress have been the many facility upgrades approved and appropriated by Congress. In addition to the reduction in the total number of findings, during the 117th Congress there were 26 shops that had no findings; since the shops are higher-hazard areas, it has been

great to see how well they have been doing in reducing and eliminating hazards in these locations. There were also 53 Member offices that not only had no findings but also self-inspected their State or District offices, demonstrating a commitment to hazard-free workplaces both on the Hill and back home.

Although we are still tabulating the results of the inspections from the 118th Congress, the preliminary results suggest that the downward trend in the total number of reported hazards will continue in future reports.

While there is good news in this report, there is still room for improvement. Most notably, there are still too many hazards in the RAC 2 category—that is, hazards where the risk of injury is relatively high. While the number of these hazards has slowly declined as safety and health programs have improved over time, we are increasingly focusing our education and inspection efforts on these types of hazards, to assist employing offices in bringing these numbers down even further.

It has been a genuine privilege and honor to serve as the OCWR General Counsel and to work with the many dedicated professionals who staff the employing offices throughout the legislative branch. I trust that the programs that have been implemented during the past 16 years will continue to improve and that, in the future, Congress and its instrumentalities will move closer to the goal of achieving a hazard-free workplace.

John D. Uelmen

General Counsel

Office of Congressional Workplace Rights

INTRODUCTION

Statutory Requirements

Congress passed the Occupational Safety and Health Act (OSH Act) in 1970 “[t]o ensure safe and healthful working conditions for working men and women[.]” 29 U.S.C. § 651, OSH Act Section 1. In what has come to be known as the General Duty Clause, the OSH Act requires employers to furnish each employee “employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious harm to employees.” 29 U.S.C. § 654(a)(1), OSH Act Section 5(a)(1). The OSH Act also requires employers and employees to comply with OSH standards issued pursuant to the statute. *Id.* at §§ 654(a)(2), (b), OSH Act Sections 5(a)(2), 5(b).

The Congressional Accountability Act (CAA) expressly requires employing offices and employees in the legislative branch to “comply with the provisions of section 5 of the Occupational Safety and Health Act of 1970.” 2 U.S.C. § 1341(a)(1). Employing offices thus are subject to the General Duty Clause, and both employing offices and employees are required to comply with OSH standards issued pursuant to the OSH Act.

Section 215(e)(1) of the CAA requires the General Counsel (GC) of the OCWR to inspect legislative branch facilities for compliance with the General Duty Clause and OSH standards under the OSH Act at least once each Congress. 2 U.S.C. § 1341(e)(1). Thereafter, the GC is required to report the results to the Speaker of the House of Representatives, President pro tempore of the Senate, and offices responsible for correcting violations, including the Congressional Budget Office, Government Accountability Office, Library of Congress, Office of the Architect of the Capitol (AOC), Office of Attending Physician, OCWR, Office of Congressional Accessibility Services, and the United States Capitol Police (USCP). 2 U.S.C. § 1341(e)(2).

High-Hazard Focus

Beginning with the 112th Congress in 2011–2012—and after consulting with staff from our congressional oversight Committees and Appropriations Subcommittees, and soliciting feedback from every employing office in the legislative branch—the OCWR has conducted our biennial OSH inspections using a “risk-based” approach, with a focus on inspecting and abating higher-risk hazards that pose the greatest threat of fatalities and injuries to employees and building occupants. We target high-hazard workplaces and work operations, including high-voltage areas, machine shops, and boiler rooms among others, as well as worksites with repeat RAC 1 and 2 findings.¹ The risk-based approach also involves inspections of facilities with specialized safety concerns implicated by their occupants, such as child care centers and the National Library Service for the Blind and Print Disabled, and thorough evaluations of certain written programs that employing offices are required to maintain under applicable OSH standards.

117th Congress Biennial Inspections

As we explained in our Biennial Report on the Occupational Safety and Health Inspections during the 116th Congress, a significant number of our scheduled inspections for that Congress were suspended due to the COVID-19 pandemic. It was possible to reschedule some but not all of those planned inspections, and even those that were rescheduled were conducted with modified procedures to ensure the safety of our OSH professionals and the employing offices' staff. One of the key components of every Biennial Report is our analysis of the trends in our findings, to help us determine whether the legislative branch is moving in the right direction when it comes to ensuring safe workplaces for employees, but the truncated inspections resulting from the pandemic created a

¹ The OCWR uses a Risk Assessment Code (RAC) system to classify hazards. RACs are classified in descending order of severity and likelihood of occurrence, with RAC 1 representing the potential for death or extremely serious injury and/or a very high likelihood of occurrence, and RAC 4 indicating the potential for less serious injury and/or a lower likelihood of occurrence. As used in the text, “higher-risk” refers to hazards rated RAC 1 and RAC 2. For further explanation of the RAC system, please see Appendix C of this report.





proverbial apples-to-oranges conundrum. In order to provide meaningful analysis, we compared the findings only from those facilities that we were able to inspect during both timeframes.

By the start of the 117th Congress, we were able to resume a full inspection schedule with all of our OSH Specialists participating. If comparing the biennial inspection during the 116th Congress to the inspection that preceded it was a comparison of apples to oranges, then comparing the inspections during the 117th Congress to those from the 116th Congress is an exercise in comparing oranges to apples. In order to identify trends and provide a meaningful assessment, we have done the reverse of what we did in our previous biennial report: although we present the data from all facilities inspected during the 117th Congress, the graphs comparing the inspections from the 116th and 117th Congresses include data only from the facilities that were inspected during both Congresses. The facilities that we could not inspect fully during the 116th Congress, and which are therefore not included in the comparison, are: the U.S. Capitol and the Capitol Visitor Center; the Capitol Power Plant and utility tunnels; the Senate Members' offices; the Government Accountability Office; and the areas of the James Madison Memorial Building of the Library of Congress that are under the control of the AOC.²

The biennial inspection during the 117th Congress resulted in a total of 2,105 findings across 73 facilities. That is significantly lower than the number of findings from the more limited inspection conducted during the 116th Congress, which totaled 2,884. When comparing the total number of findings for those assessments conducted during both the 116th and 117th Congresses, the difference is stark: 1,589 for the 117th, down from 2,884 during the 116th—a decrease of 45%.

Many factors may have contributed to this drop in the number of findings, but there is no question that this is a very positive trend, due in no small part to the efforts of the employing offices' dedicated safety professionals, along with other staff who are committed to keeping their colleagues safe and healthy at work. These individuals are aware of the hazards identified and abated in previous inspections, and are improving their processes for preventing recurrence of those issues.

² During the 116th Congress we were able to conduct a partial inspection of the Madison Building, but not those areas that are under the control of the AOC.



A change in our inspection procedure—specifically, combining multiple instances of certain hazards in a single facility, such as multiple fire extinguishers without required records of inspection, into a single finding for that facility, which we call “whole facility findings”—accounts for some of the decrease. It is also likely that ongoing renovations and other updates throughout campus are serving to eliminate hazardous conditions, as are improvements to employing offices’ safety programs and training efforts. Decreased occupancy due to telework and hybrid work may also play a role.

One of the keys to improving safety on Capitol Hill is the excellent working relationship between the OCWR staff and representatives of the various legislative branch employing offices. We work closely with safety

personnel at the AOC and other employing offices to coordinate inspections, ensuring that knowledgeable individuals are available on site, and that our inspectors have access to all high-hazard facilities and can conduct work observations. We collaborate with the employing offices to monitor abatement of identified hazards, address any contested findings, and educate safety staff and other employees regarding safe work practices and environments. Conducting opening and closing conferences and other meetings via videoconference has proved beneficial to that collaboration, as has the electronic sharing of documents and reports. We have also made significant improvements to our findings database, enabling us to analyze and share data more effectively, which in turn allows us to identify trends and focus on those areas that need improvement.

RESULTS OF INSPECTIONS

117th Congress Inspection Results

During the 117th Congress, our inspectors identified 2,105 total hazards. Of those, 1,589 hazards were identified in the same facilities assessed during the limited 116th biennial inspection, which had resulted in 2,884 total hazards. This represents a 45% decrease in the hazards identified in those facilities. The distribution of findings by category was similar to that of the past several biennial inspections, as discussed in more detail in the next section.

This significantly lower number of findings is a welcome indication that the safety culture has improved across Capitol Hill. As mentioned above, other factors may have contributed to these findings, including renovations to older buildings and the fact that many legislative branch employees still telework much more than they did prior to the COVID-19 pandemic, but those types of factors cannot fully account for the magnitude of the change. Employing offices' safety programs, training, and self-inspections undoubtedly have led to greater compliance with the applicable safety standards.

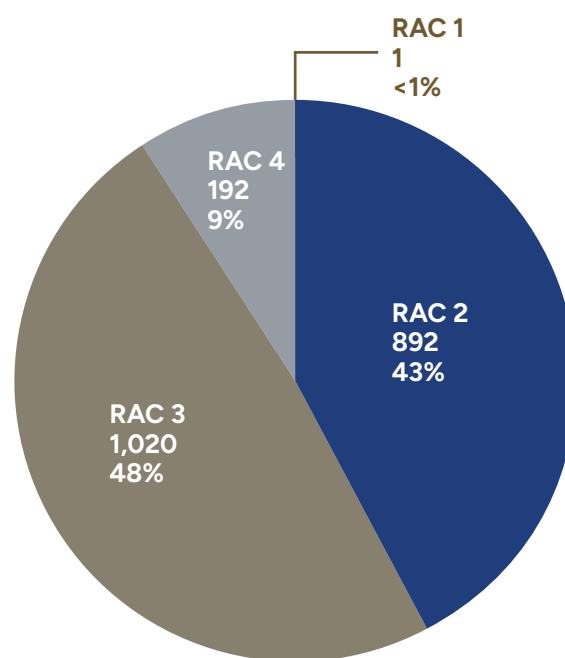
The distribution of all identified hazards by RAC is depicted in Figure 1. Approximately 43% of all hazards were deemed to be higher-risk hazards (RAC 1 and RAC 2).³

The inspection revealed only one hazard that was identified as RAC 1 (most severe). That hazard involved multiple instances of sprinkler heads covered with foil in the parking garage of a Member office building. That hazard has been abated.

As shown in Figure 2, of the 892 hazards categorized as RAC 2, more than half involved electrical hazards (55%), while just over a quarter were hazards related to exit routes and emergency planning (26%). The other most common RAC 2 hazards involved walking-

FIGURE 1

All Hazards by RAC—117th Congress



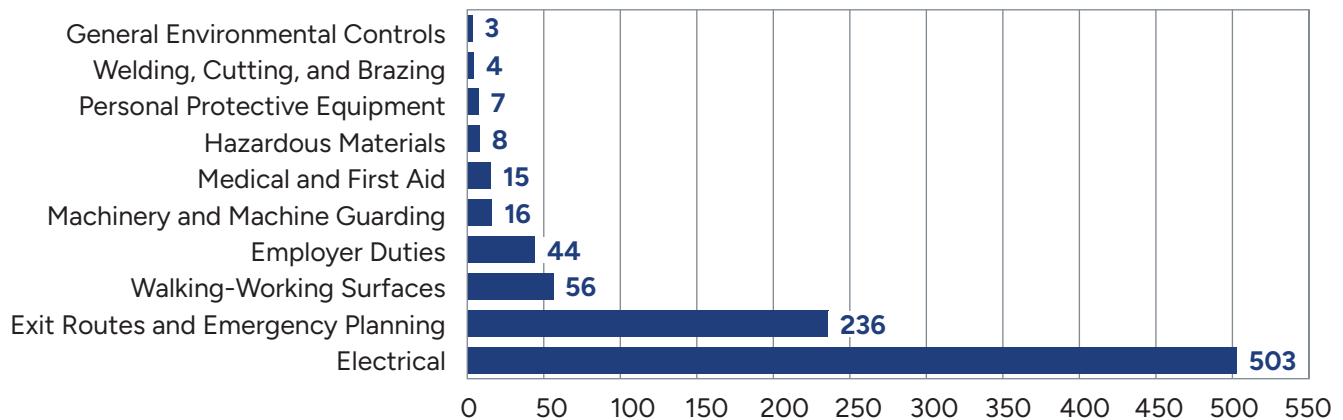
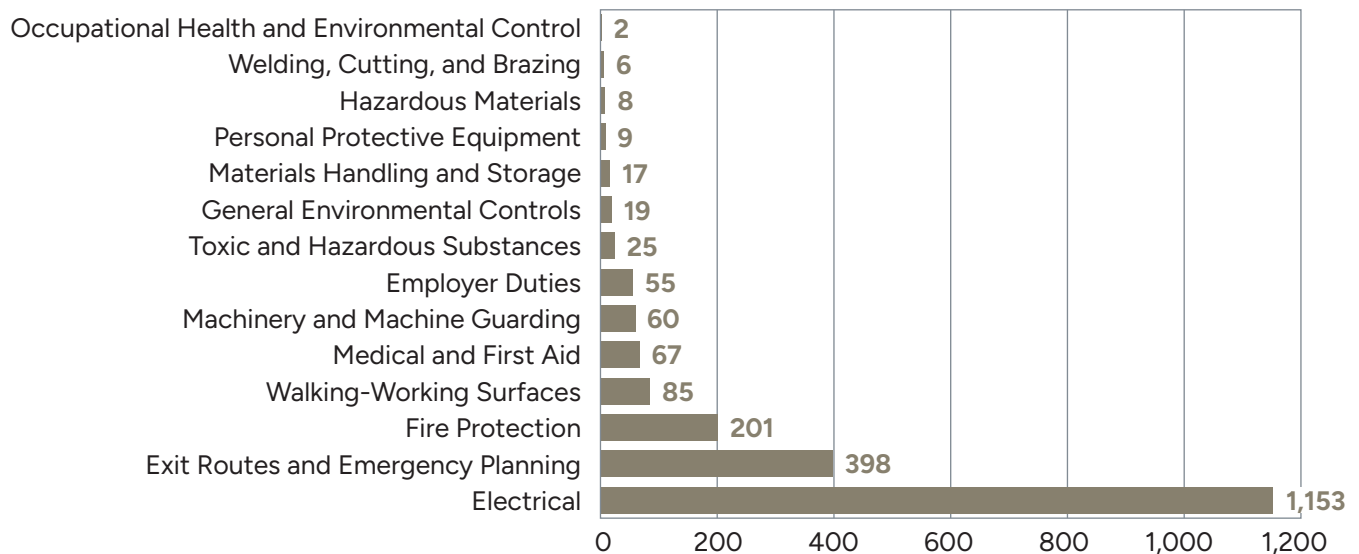
working surfaces (6%), employer duties⁴ (5%), machinery and machine guarding (2%), and medical and first aid (2%).

The distribution of all hazards by type is shown in Figure 3.

The most common hazards identified were electrical, accounting for more than half of all findings (55%). Electrical hazards include such deficiencies as problems with panels, boxes, outlets, or covers (almost 50% of all electrical findings); improper use of surge protectors,

³ This distribution represents a significant change from that of the 116th Congress, as discussed in more detail in the next section of this report.

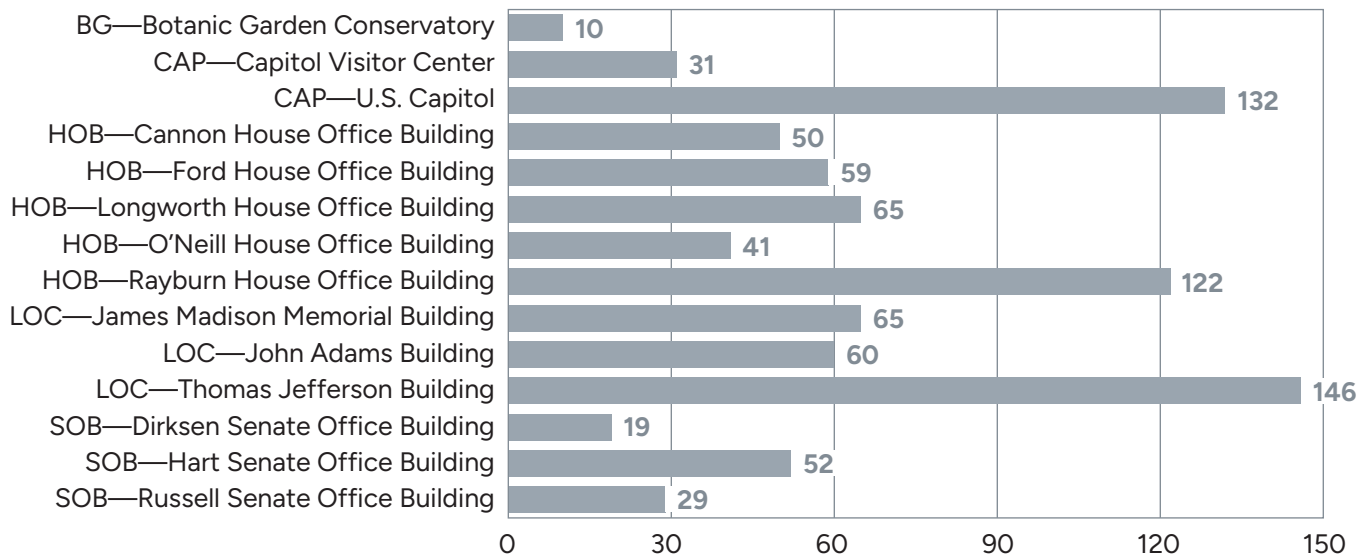
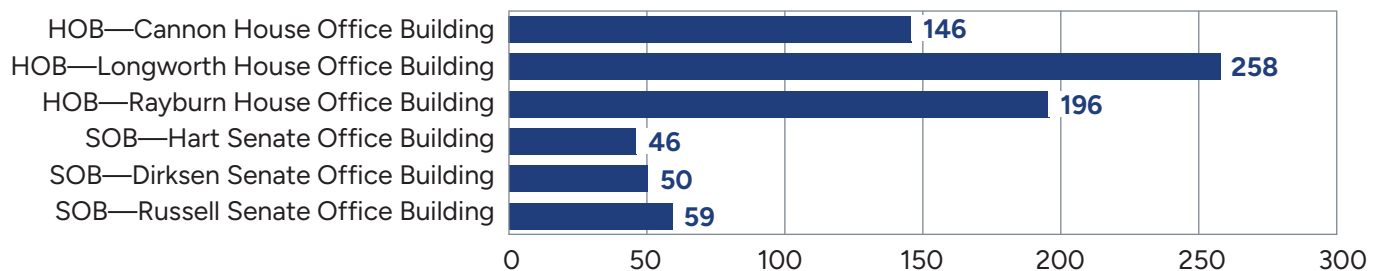
⁴ The "employer duties" designation represents findings of violations of the General Duty Clause, section 5(a)(1) of the OSH Act, 29 U.S.C. § 654(a)(1).

FIGURE 2**RAC 2 Hazards by Type—117th Congress****FIGURE 3****All Hazards by Type—117th Congress**

power strips, or extension cords, including the use of “daisy chains” (about 40% of all electrical findings); issues involving exposed wires or other energized components (about 4% of all electrical findings); problems with light bulbs, tubes, and fixtures (about 4% of all electrical findings); and unlabeled or poorly labeled circuits and breakers (about 3% of all electrical findings).

Approximately 19% of the hazards relate to exit routes and emergency planning.⁵ Of those hazards, almost one quarter involved obstructed exit routes. Most of the other findings in this category involved impermissibly narrow exit access routes, missing ceiling tiles, issues with annunciators, locked or damaged exit doors, missing or inoperable emergency lighting or exit signage, problems with fire

⁵ Prior to the 116th Congress, this category was referred to as “means of egress.” The name of the category has been updated in our database and reports to reflect that these hazards constitute violations of Subpart E of 29 C.F.R. Part 1910, which is entitled Exit Routes and Emergency Planning.

FIGURE 4**Hazard Distribution by Building (not including Members' office space)—117th Congress****FIGURE 5****Member Office Hazard Distribution by Building—117th Congress**

alarm systems, incomplete implementation of emergency action plans, or damaged sprinkler heads. As in the past, a significant number of the hazards related to exit routes and emergency planning concerned unprotected penetrations in fire barriers, which compromise fire safety by allowing the migration of fire and smoke.

Although our biennial inspections focus primarily on higher-hazard areas, during each Congress we inspect all facilities where legislative branch employees work in the Washington, D.C. area. During the 117th Congress we inspected over 70 legislative branch facilities on and

around Capitol Hill. The distribution of hazards among the principal buildings on Capitol Hill inspected during the 117th Congress, not including Members' offices, is depicted in Figure 4.

The distribution of hazards among the Members' offices in the House and Senate Office Buildings is depicted in Figure 5.⁶

Appendix A contains a listing of all facilities and areas inspected during the 117th Congress with a breakdown of the number of hazards found by the employing office

⁶ Findings in Members' offices may be the responsibility of either the Member's office or the AOC. Findings that are the responsibility of the House Members' offices are assigned to the Office of House Employment Counsel for abatement, and findings that are the responsibility of the Senate Members' offices are assigned to the Office of the Senate Chief Counsel for Employment for abatement.

responsible for abatement. At each location, the 117th Congress inspection also included a review of written programs required by the OSHA standards, including those related to hazard communication (HAZCOM), personal protective equipment (PPE), respiratory protection, confined spaces and permit-required confined spaces, control of hazardous energy (lockout/tagout), emergency action plans, hearing conservation, and general environmental controls, among others. Generally, the largest numbers of program-related findings during the 117th Congress inspection involved emergency action plans; other program findings included those related to fire protection (especially fire extinguishers) and HAZCOM programs, including the need to update or obtain safety data sheets.

As of December 2024, approximately 69% of the hazards identified during the 117th Congress inspection had been reported as abated by the employing offices.⁷ Figure 6 shows the breakdown between open and closed hazard findings (a hazard finding is closed when the employing office reports that the identified hazard has been abated, and provides information including how and when the hazard was eliminated).

Comparison of Inspections from the 116th and 117th Congresses

In comparing the 117th Congress inspection results to those from the previous Congress, it is important to remember that the more recent results represent a full inspection, whereas the previous inspection left out several facilities involving high-hazard areas or operations. To account for this difference, we have subtracted those findings from the 117th Congress that were associated with the assessments we could not conduct during the 116th due to the COVID-19 pandemic. This leaves us with 1,589 findings from the 117th, as compared to 2,884 from the 116th.

Figure 7 shows the distribution of hazards by RAC for the comparable inspections during the 116th and 117th Congresses. The distribution of hazards from the 117th Congress is very different from that of the hazards identified in the previous biennial inspection: during the 116th Congress only 22% of hazards were RAC 1 or RAC 2, compared to 43% during the 117th. Further analysis reveals that this change was not due to an increase in higher-risk hazards, but rather a decrease in lower-risk hazards.

Both inspections resulted in one RAC 1 finding. The number of RAC 2 hazards went up from the 116th to the 117th, but that change can be accounted for by the larger number of high-hazard areas inspected during the full

FIGURE 6

Abatement Status as of December 2024—117th Congress

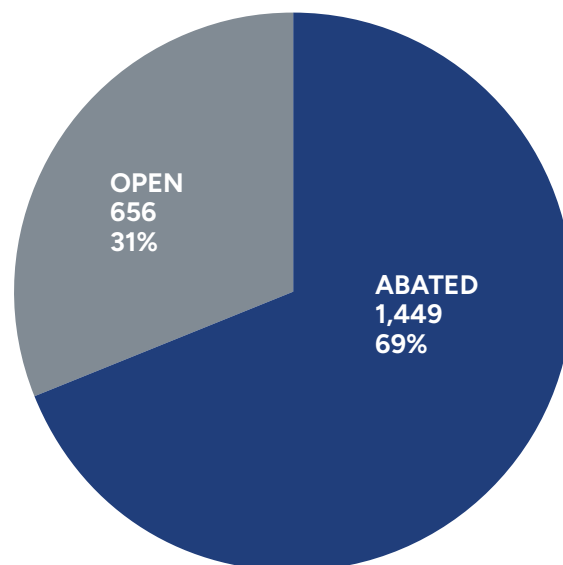
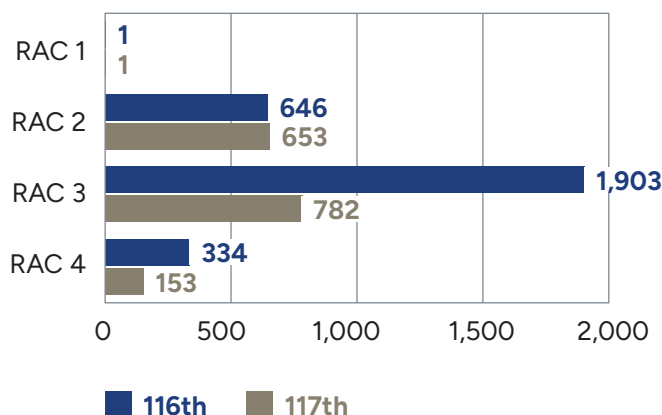


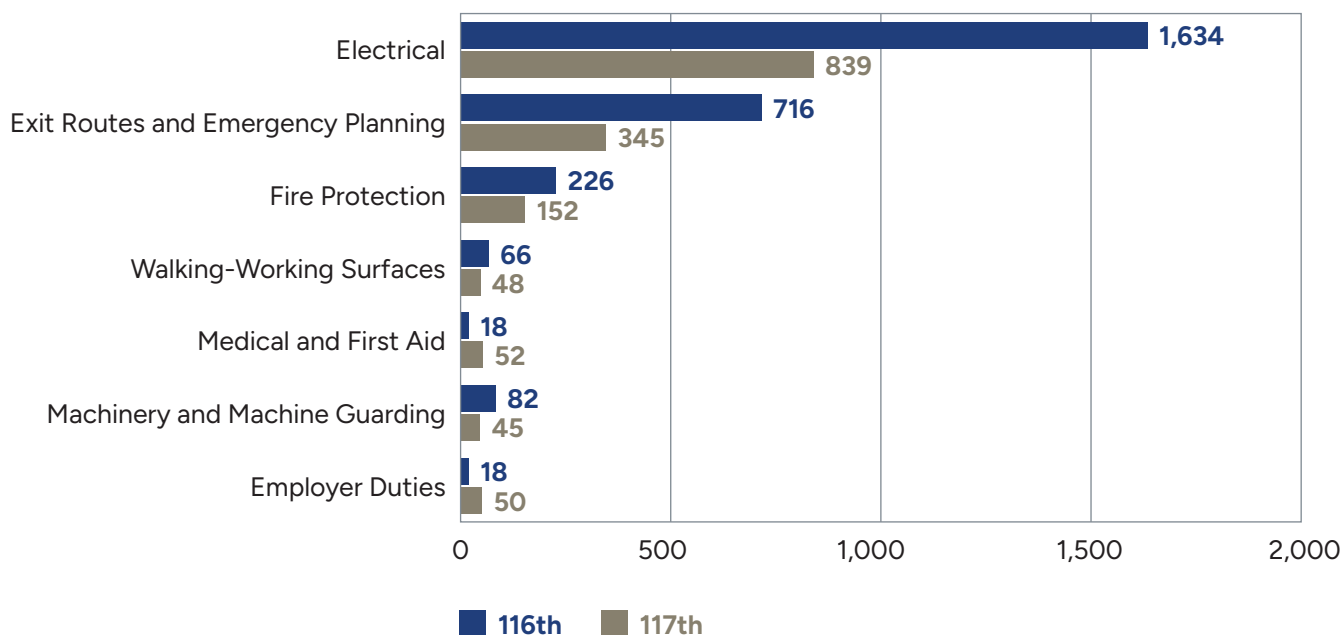
FIGURE 7

Comparison of Number of Hazards by RAC



117th Congress inspection as compared to the truncated 116th Congress inspection. In fact, when comparing only those facilities inspected during both Congresses, the number of RAC 2 findings is almost identical: 646 during the 116th compared to 653 during the 117th. By contrast, the number of lower-risk findings went down significantly from the 116th to the 117th: RAC 3 findings

⁷ Based upon information received from the AOC in response to the draft of this report, the percentage of hazards identified during the 117th Congress that have been abated may now be higher. See Appendix B.

FIGURE 8**Comparison of Number of Most Common Hazards by Type**

went down from 1,903 during the 116th to 1,020 during the 117th, 782 of which were in the same facilities inspected during the previous Congress; RAC 4 findings went down from 334 during the 116th to 192 during the 117th, 153 of which were in the same facilities inspected during the previous Congress.

Ideally, we would see decreases in the numbers of both high- and low-risk hazards. It is disappointing that the number of RAC 2 hazards essentially held constant from the 116th Congress to the 117th. However, the large decrease in the number of RAC 3 and RAC 4 hazards is still cause for optimism. Employing offices clearly are becoming more adept at identifying, abating, and preventing these lower-risk hazards.

When looking at the distribution of hazards by type, the results from the two inspections are much more similar, as shown in Figure 8.

The most common types of findings were consistent across the two Congresses, with electrical hazards comprising the majority of findings, followed by hazards related to exit routes and emergency planning and fire protection. The number of findings was down across all three of those categories, which is an encouraging trend.

The two categories in which the number of findings notably increased were medical and first aid (from 18 findings to 52) and employer duties, the designation for violations of the General Duty Clause (from 18 findings to 50). The findings in the medical and first aid category were related to eyewash stations (e.g., the eyewash solution had expired, access to the station was blocked, or the station had not been regularly inspected) or expired supplies in first aid kits. The increase in these types of findings may be attributable at least in part to workers being out of the workplace during the COVID-19 pandemic, but regardless of the reason, it is important for employing offices to ensure that employees have ready access to eyewash stations and unexpired first aid supplies in the event of medical emergencies. The increase in the number of General Duty Clause findings—i.e., hazards that are not covered by a specific OSHA standard but are nevertheless “recognized hazards that are causing or are likely to cause death or serious harm to employees” under section 5(a)(1) of the OSH Act—should serve as a reminder to employing offices that even if they are in compliance with all applicable standards, they are still obligated to ensure that the workplace is free from all recognized hazards, which requires constant vigilance.



FIRE AND LIFE SAFETY ISSUES

The OCWR is currently monitoring the abatement status of four open citations related to fire and life safety on Capitol Hill, issued in 2000 (Citations 16, 18, and 19) and 2001 (Citation 31).

Citation 16—U.S. Capitol Building

Citation 16 addressed safety hazards related to exit stairwells in the U.S. Capitol Building. The AOC has completed several measures to improve means of egress throughout the building, including expanding sprinkler coverage, abating the majority of open stairwells, and installing new smoke control systems for the grand stairs. Additional efforts to abate the hazards in the stairwells are ongoing.

In March 2020 the OCWR GC approved the AOC's Request for Modification of Abatement (RFMA) regarding this citation, which called for certain infrastructure changes allowing for compartmentalization of the building to enhance fire safety. However, as discussed in our report on the 116th biennial inspection, the plans approved in the 2020 RFMA are being reassessed in the wake of the attack on the U.S. Capitol on January 6, 2021. This has not only pushed back the timeframe for abatement of the fire and life safety hazards, but may require changes to the existing design to account for security considerations. A new RFMA will need to be submitted for the OCWR GC's approval, which will include a timeline for completion of the design and construction phases of the project. The OCWR will continue to work with the AOC to ensure that the hazards identified in Citation 16 are completely and effectively abated.

Citation 18—Cannon House Office Building

Citation 18 pertains to fire safety issues in the Cannon House Office Building. This citation is being abated as

part of the ongoing Cannon Renewal Project, as provided in the RFMA approved in April 2014. The AOC has already made certain fire safety improvements, such as upgraded sprinkler protection and the installation of fire-rated doors and other hardware. The current abatement efforts involve dividing the building into fire zones using fire barriers between each zone, which will allow for greater protected egress from the building in the event of a fire. This project, known as the House Alternate Life Safety Analysis (HALSA), is nearing completion and will be evaluated by the OCWR to determine whether the hazards identified in Citation 18 have been abated.

Citation 19—Russell Senate Office Building

Citation 19 addressed numerous life-threatening fire and emergency evacuation hazards in the Russell Senate Office Building. After years of disagreements among stakeholders over the AOC's abatement plan, the appointment of a Blue Ribbon Panel, and the issuance of an Amended Citation 19 in 2012, the AOC submitted and received approval of a final RFMA in February 2018. Abatement work is progressing in accordance with that RFMA.

There are currently 10 open action items in connection with Citation 19, which are in various stages of completion: some are still in the design phase, while others are nearly finished, and most are somewhere in between. These action items include upgrades to the sprinkler and smoke detection systems, installation of fire barriers, the construction of additional exits, and the addition of signage and handrails to assist with emergency egress, among other improvements.

Most of the open action items either are being incorporated into the AOC's planned Russell Senate Office Building Infrastructure Upgrade Project or will be addressed as part of an ongoing Committee Hearing Room Upgrade Program.

Citation 31-2—Library of Congress

Citation 31-2 addressed fire and life safety hazards in the Thomas Jefferson Building of the Library of Congress. The AOC continues to make progress on abating the hazards identified in this citation, in accordance with the RFMA that was approved by the Office of Compliance in December 2014. Some projects are already completed, others are underway, and a few have not yet received funding. The final abatement of the entire citation is currently estimated to be completed in the mid-2030s.

Other Citations

One other open citation, Citation 69, was issued to the USCP in July 2021 and concerns inadequacies in personal protective equipment and other controls in connection with the events at the U.S. Capitol on January 6, 2021.⁸ The OCWR GC continues to work with the USCP and the Fraternal Order of Police as they work to improve protections for officers on duty during large demonstrations with the potential for violence. Relatedly, the OCWR has also renewed its recommendation to Congress that the CAA be amended to grant the OCWR GC the same authority as the Secretary of Labor to review employing offices' injury and illness data.⁹ The events of January 6, 2021 highlighted the need for this authority:

the USCP did not provide the OCWR GC with requested information regarding the number of its employees injured on that date or the nature of those injuries, which hindered our ability both to identify needed improvements and to ensure that such improvements are implemented. Access to this information would allow us to better focus our inspections on practices and procedures that are producing injuries and illnesses and allow us to more effectively assess the impact of improvements being made.

Three citations, all involving the Library of Congress, have been closed since we issued our last report. In May 2023 the OCWR GC closed Citation 30-2, which was issued in 2001 and concerned fire and life safety hazards in the John Adams Building, as well as Citation 64, which was issued in 2006 and amended in 2007, and concerned potential employee exposure to lead-based paint in the Thomas Jefferson Building. In March 2024 the OCWR GC closed Citation 29-1, which was issued in 2001 and addressed fire hazards in connection with the old book conveyor system that served all three Library buildings on Capitol Hill. The AOC submitted a Notice of Corrective Action (NOCA) with respect to each of these citations, and the OCWR GC closed the citations after reviewing the NOCAs and determining that the hazards had been abated.

⁸ Citation 69 is available on the OCWR website at <https://www.ocwr.gov/publications/reports/other-reports/citation-69/>. The accompanying Special Report on Occupational Safety and Health Concerns Arising Out of the Events of January 6, 2021 is available at https://www.ocwr.gov/wp-content/uploads/2021/07/report_osh_concerns_arising_from_events_jan_6_2021.pdf.

⁹ See the most recent Section 102(b) Biennial Report, Recommendations to the 119th Congress, available at <https://www.ocwr.gov/publications/reports/102b-recommendations-congress/section-102b-biennial-report-recommendations-for-the-119th-congress/>.



REQUESTOR-INITIATED INSPECTIONS AND INCIDENT INVESTIGATIONS

Under the CAA, covered employees, employing offices, and bargaining unit representatives of covered employees may ask the OCWR GC to inspect and investigate places of employment under the jurisdiction of employing offices to determine whether there are violations of the OSH Act. 2 U.S.C. § 1341(c)(1). Upon receipt of such requests, the OCWR investigates the allegations, and when hazards are found to exist, the GC issues a report to all involved parties and directs that appropriate abatement be made by the employing office responsible for correction of the violation. The GC also may make recommendations based upon best practices used in the private sector that, while not mandatory, would enhance the level of safety and health in legislative branch facilities. Once the employing office has informed the OCWR that it has abated the hazard, and the OCWR has confirmed that abatement is complete, we close our investigation.

Apart from biennial inspections, these requests are the single most important source of information to the OCWR concerning health and safety violations, since they are most often filed by employees who are exposed to, or familiar with, hazardous conditions in the legislative branch. The OCWR also occasionally opens OSH investigations after learning of safety-related incidents or potentially hazardous conditions via other means, such as news reports, self-reporting by employing offices, or independent observations.

During the 117th Congress, the OCWR opened 18 investigations into potential safety and health hazards based on requests and/or reports of incidents. As in the past, the requests that we received during the 117th

Congress occasionally named more than one employing office. As the office responsible for maintaining facilities for the majority of legislative branch offices, the AOC is frequently designated as the entity responsible for abating hazards even in cases where the requests are filed by employees of other employing offices; during the 117th Congress, the AOC was involved in some capacity in 8 of the 18 cases opened. Other employing offices involved in these OSH investigations included the USCP (8); the offices of the Senate Sergeant at Arms (2) and House Sergeant at Arms (2); the office of the Chief Administrative Officer of the House (2); offices of House Members (2); the Library of Congress (1); and the Office of Attending Physician (1). Five cases involved issues related to COVID-19 protections in the workplace. Four cases arose out of the events of January 6, 2021, and involved issues such as personal protective equipment, respiratory protection, and cleanup of hazardous materials. Three cases involved vermin in various buildings on Capitol Hill. One investigation was initiated after a USCP officer was killed while on duty at the North Barricade; the OCWR determined that there were no OSH violations in connection with the fatality. The other cases opened during the 117th Congress concerned a wide variety of safety and health concerns, including potential asbestos exposure, fire safety, personal protective equipment, hazard communication, indoor air quality, and heat stress. The OCWR investigated the alleged hazards identified in the requests for inspection and issued reports with the findings of those investigations.

Of the 18 cases opened during the 117th Congress, 15 are closed and 3 remain open as of the date of this report.

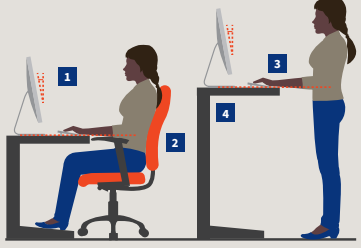
EDUCATION AND OUTREACH

An important part of the OCWR's mandate is education and outreach to the legislative branch community, to ensure that covered employees and employing offices understand their rights and obligations under the CAA and the available methods for raising and addressing concerns. This is as true for OSH issues as it is for other areas of labor and employment law.

During the 117th Congress the OCWR continued to emphasize OSH-related education and outreach. We continued our ongoing efforts to add Fast Facts and other educational documents to our website on a variety of topics; reached out to Member offices regarding common office safety hazards in advance of inspections; and continued our practice of having the OSH Specialists provide informal instruction and technical assistance to employing offices upon request or in the field during biennial inspections. As always, we supported the employing offices' own training efforts, both through our evaluation of programs as part of the biennial inspection and through hazard abatement and recommended best practices in connection with our investigations into incidents or Requests for Inspection.


Office Ergonomic Guidance

The Office of Congressional Workplace Rights (OCWR) is committed to minimizing musculoskeletal disorders (MSDs) throughout the legislative branch. The guidelines below include the basic elements for establishing an ergonomically sound office environment. Some employing offices may already have ergonomic programs, and this guidance is not intended to replace those programs, but it may offer supplemental information.



- 1 MONITOR**
 - Eye level is approximately 2 to 3 inches below the top of the monitor
 - Monitor is approximately an arm's length away
 - Eyes are looking slightly downward without bending the neck
 - Monitor is centered in relation to the body's position**MONITOR GLARE**
 - Adjust monitor to obtain a 10–20 degree tilt to reduce glare
 - Adjust lighting to reduce glare
 - Adjust monitor display setting
 - Clean monitor screen
- 2 CHAIR HEIGHT & ADJUSTMENTS**
 - Chair slightly reclined at 100 to 110 degrees with lumbar support
 - Knees are level with hips
 - Hips and knees are at 90 degrees
 - Thighs are parallel to the floor
 - Elbows are at sides and bent at 90 degrees or more
 - Forearms are horizontal
 - Adjust armrests to elbow height
 - Wrists are in a neutral (straight) posture, in line with forearms
 - Adjust chair so pressure is not placed behind the knees
 - Feet are flat on the floor or resting on a footrest
- 3 INPUT DEVICES: KEYBOARD & MOUSE**
 - Keyboard should be directly in front of monitor
 - The G and H buttons on the keyboard are aligned with your nose
 - Keyboard in a flat position
 - Mouse adjacent to keyboard
 - Keyboard and mouse on the same working level
 - Use external keyboard and mouse with laptop
- 4 STANDING DESK HEIGHT**
 - Adjust desk so elbows are at sides and bent at 90 degrees or more
 - Adjust desk so forearms are horizontal
 - Adjust position so wrists are in a neutral (straight) posture, in line with forearms
 - Consider standing on an anti-fatigue cushion mat

Contact OCWR at OSH@ocwr.gov if you have any questions or would like additional information.



ACKNOWLEDGEMENTS

Under the CAA, management of the OSH program is the responsibility of the OCWR GC. I have been the GC of the OCWR since December 2015, and had overall management of the 117th Congress biennial inspections.

The inspections for the 117th Congress were coordinated by OSH Program Manager Shonda Perkins. Ms. Perkins managed the inspection team and acted as liaison to the AOC and other employing offices, which included overseeing the scheduling of inspections and conferences, processing abatement data, and addressing contested findings.

The inspection team for the 117th Congress was comprised of Senior OSH Specialist Mark Nester, OSH Specialist and Fire Safety Specialist Benjamin Pierce,

OSH Specialist and Data Analyst James Peterson, and OSH Specialists Crystal Barber, Jerod Duet, Scott Gable, and Darlene Isip.

During the 117th Congress, requestor-initiated inspections were conducted principally by Deputy General Counsel Hillary Benson in coordination with Ms. Perkins and the OSH Specialists. Don Kennedy, C.I.H., J.D., also provided part-time industrial hygiene consulting services.

This report was authored principally by Ms. Benson, with substantial and invaluable contributions from Ms. Perkins and Mr. Peterson.

John D. Uelmen
General Counsel
July 2025

APPENDICES



APPENDIX A

Findings by Facility/Area	Number of Findings		
201 Massachusetts Avenue, NE	3	CAP—Capitol Visitor Center	31
Employing Offices; Stennis Center for Public Service	3	Architect of the Capitol; Office of the Architect of the Capitol	30
B Utility Tunnel	2	U.S. House of Representatives; Chief Administrative Officer	1
Architect of the Capitol; Office of the Architect of the Capitol	2	CAP—U.S. Capitol	132
BCDR Warehouse	2	Architect of the Capitol; Office of the Architect of the Capitol	127
U.S. House of Representatives; Chief Administrative Officer	2	Office of Attending Physician	2
BG—Botanic Garden Administration Building	1	U.S. House of Representatives; Chief Administrative Officer	1
Architect of the Capitol; Office of the Architect of the Capitol	1	United States Capitol Police	2
BG—Botanic Garden Conservatory	10	CPP—42 I “Eye” St. SE Garage (Capitol Grounds & High-Voltage Building)	8
Architect of the Capitol; Office of the Architect of the Capitol	10	Architect of the Capitol; Office of the Architect of the Capitol	8
BG—Botanic Garden HeadHouse	8	CPP—Ash Silo	2
Architect of the Capitol; Office of the Architect of the Capitol	8	Architect of the Capitol; Office of the Architect of the Capitol	2
BG—Botanic Garden Lath House	1	CPP—Blue Building (Butler Building)	7
Architect of the Capitol; Office of the Architect of the Capitol	1	Architect of the Capitol; Office of the Architect of the Capitol	7
Cabin Branch Warehouse	2	CPP—Boiler Building (Boiler Power House)	24
Architect of the Capitol; Office of the Architect of the Capitol	2	Architect of the Capitol; Office of the Architect of the Capitol	24
CAP—Capitol Grounds	1	CPP—Coal Conveyor Tunnel	5
United States Capitol Police	1	Architect of the Capitol; Office of the Architect of the Capitol	5
CAP—Capitol Hill Complex	1	CPP—East Refrigeration (Co-Gen Plant)	6
Architect of the Capitol; Office of the Architect of the Capitol	1	Architect of the Capitol; Office of the Architect of the Capitol	6
		CPP—Exterior Grounds	3
		Architect of the Capitol; Office of the Architect of the Capitol	3

CPP—Fuel Pump Station (Bulk Fuel Pump Area)	3	GPO—GPO Warehouse	28
Architect of the Capitol; Office of the Architect of the Capitol	3	Architect of the Capitol; Office of the Architect of the Capitol	20
		U.S. Senate; Senate Sergeant at Arms	8
CPP—Generator Building	2	HOB—14 E Street Garage	13
Architect of the Capitol; Office of the Architect of the Capitol	2	Architect of the Capitol; Office of the Architect of the Capitol	13
CPP—Power Plant Administration (Admin. Building)	11	HOB—Cannon House Office Building	196
Architect of the Capitol; Office of the Architect of the Capitol	11	Architect of the Capitol; Office of the Architect of the Capitol	58
		Office of Attending Physician	1
CPP—South Coal Yard	1	U.S. House of Representatives; Chief Administrative Officer	3
Architect of the Capitol; Office of the Architect of the Capitol	1	U.S. House of Representatives; Office of House Employment Counsel	134
CPP—West Refrigeration (West Plant)	17	HOB—East House Underground Garage	2
Architect of the Capitol; Office of the Architect of the Capitol	17	Architect of the Capitol; Office of the Architect of the Capitol	2
Fort Meade	3	HOB—Ford House Office Building	59
Architect of the Capitol; Office of the Architect of the Capitol	3	Architect of the Capitol; Office of the Architect of the Capitol	46
G Utility Tunnel	2	Employing Offices; Commission on Security and Cooperation in Europe	4
Architect of the Capitol; Office of the Architect of the Capitol	2	U.S. House of Representatives; Chief Administrative Officer	8
GAO—Government Accountability Office	48	United States Capitol Police	1
Employing Offices; U.S. Government Accountability Office	48	HOB—Longworth House Office Building	323
GFAC—Blue Plains	20	Architect of the Capitol; Office of the Architect of the Capitol	105
Architect of the Capitol; Office of the Architect of the Capitol	20	U.S. House of Representatives; Chief Administrative Officer	3
GPO—Government Publishing Office	3	U.S. House of Representatives; Office of House Employment Counsel	215
Architect of the Capitol; Office of the Architect of the Capitol	1	HOB—O'Neill House Office Building	41
United States Capitol Police	2	Architect of the Capitol; Office of the Architect of the Capitol	39
		U.S. House of Representatives; Chief Administrative Officer	2

HOB—Rayburn House Office Building	318	LOC—Special Facility—St. Cecilia's	8
Architect of the Capitol; Office of the		Architect of the Capitol; Office of the	
Architect of the Capitol	99	Architect of the Capitol	6
Office of Attending Physician	2	Library of Congress	1
U.S. House of Representatives;		United States Capitol Police	1
Chief Administrative Officer	14		
U.S. House of Representatives;		LOC—Thomas Jefferson Building	146
Office of House Employment Counsel	202	Architect of the Capitol; Office of the	
United States Capitol Police	1	Architect of the Capitol	116
		Library of Congress	30
HOB—West House Underground Garage	40		
Architect of the Capitol; Office of the		LOC NAVCC—Central Plant	7
Architect of the Capitol	32	Architect of the Capitol; Office of the	
U.S. House of Representatives;		Architect of the Capitol	7
Chief Administrative Officer	7		
United States Capitol Police	1	LOC NAVCC—Conservation Building and Vaults	28
		Architect of the Capitol; Office of the	
LOC—Book Module 5	2	Architect of the Capitol	15
Architect of the Capitol; Office of the		Library of Congress	13
Architect of the Capitol	2		
		LOC NAVCC—Nitrate Vaults	7
LOC—Book Module Facility	8	Architect of the Capitol; Office of the	
Architect of the Capitol; Office of the		Architect of the Capitol	7
Architect of the Capitol	7		
Library of Congress	1	LOC NAVCC—Shed	2
		Architect of the Capitol; Office of the	
LOC—Cabin Branch	2	Architect of the Capitol	2
Architect of the Capitol; Office of the			
Architect of the Capitol	2	LOC NAVCC—Exterior Grounds	3
		Architect of the Capitol; Office of the	
LOC—James Madison Memorial Building	65	Architect of the Capitol	3
Architect of the Capitol; Office of the			
Architect of the Capitol	58		17
Library of Congress	7	Architect of the Capitol; Office of the	
		Architect of the Capitol	17
LOC—John Adams Building	60		
Architect of the Capitol; Office of the		R Utility Tunnel	8
Architect of the Capitol	49	Architect of the Capitol; Office of the	
Library of Congress	11	Architect of the Capitol	7
		United States Capitol Police	1
LOC—National Library Service for the Blind and Print Disabled	16		
Library of Congress	16	SC—Supreme Court	15
		Architect of the Capitol; Office of the	
		Architect of the Capitol	15

SOB—Daniel Webster Hall	6	SOB—Senate Underground Garage	2
Architect of the Capitol; Office of the		Architect of the Capitol; Office of the	
Architect of the Capitol	5	Architect of the Capitol	2
U.S. Senate; Senate Sergeant at Arms	1		
SOB—Dirksen Senate Office Building	69	SOB—Storage Building (Blue Plains)	2
Architect of the Capitol; Office of the		Architect of the Capitol; Office of the	
Architect of the Capitol	34	Architect of the Capitol	2
U.S. Senate; Senate Chief Counsel			
for Employment	35	USCP—Fairchild Building	12
SOB—Hart Senate Office Building	98	Architect of the Capitol; Office of the	
Architect of the Capitol; Office of the		Architect of the Capitol	7
Architect of the Capitol	66	United States Capitol Police	5
Office of Attending Physician	1		
U.S. Senate; Senate Chief Counsel		USCP—K9 Kennels	2
for Employment	30	Architect of the Capitol; Office of the	
U.S. Senate; Senate Sergeant at Arms	1	Architect of the Capitol	1
		United States Capitol Police	1
SOB—Landover Mail Facility	3	USCP—United States Capitol Police HQ	14
Architect of the Capitol; Office of the		Architect of the Capitol; Office of the	
Architect of the Capitol	3	Architect of the Capitol	11
		United States Capitol Police	3
SOB—Landover Printing Facility	3	USCP—Vehicle Maintenance (67 K Street)	8
Architect of the Capitol; Office of the		Architect of the Capitol; Office of the	
Architect of the Capitol	1	Architect of the Capitol	2
U.S. Senate; Senate Sergeant at Arms	2	United States Capitol Police	6
SOB—Landover Warehouse	2	USCP—Verizon	1
Architect of the Capitol; Office of the		United States Capitol Police	1
Architect of the Capitol	2		
SOB—Russell Senate Office Building	88	USCP—Cheltenham Bldg. 31	2
Architect of the Capitol; Office of the		United States Capitol Police	2
Architect of the Capitol	42		
U.S. Senate; Senate Chief Counsel		USCP—Cheltenham PAC Bldg.	2
for Employment	46	United States Capitol Police	2
SOB—SAA Senate Support Facility	6	WRC South Parking Lot	2
Architect of the Capitol; Office of the		Architect of the Capitol; Office of the	
Architect of the Capitol	3	Architect of the Capitol	2
U.S. Senate; Senate Sergeant at Arms	3	GRAND TOTAL	2,105
SOB—Senate Employees' Child Care Center	10		
Architect of the Capitol; Office of the			
Architect of the Capitol	7		
U.S. Senate; Senate Sergeant at Arms	3		

APPENDIX B



Architect of the Capitol
U.S. Capitol, Room SB-16
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March 27, 2025

Mr. John D. Uelmen
General Counsel
Office of Congressional Workplace Rights
110 Second Street, SE
Room LA-200, John Adams Building
Washington, DC 20540-1999

Subject: Draft Biennial Report on Occupational Safety and Health (OSH) Inspections conducted during the 117th Congress, Office of Congressional Workplace Rights (OCWR) letter dated January 30, 2025; comments from Architect of the Capitol

Dear Mr. Uelmen:

The Architect of the Capitol (AOC) appreciates the opportunity to review and provide a response to the January 2025 draft Biennial Report on the OSH inspections conducted during the 117th Congress. We are also pleased to provide you with an update on the AOC's efforts during this timeframe in the enclosed report, "The AOC's Significant Accomplishments in Occupational Safety and Health During the 117th Congress."

Safety is a core value at the AOC and our goal is to have a workplace free of accidents/incidents and unsafe conditions. In pursuit of this goal, we implemented several initiatives to enhance our existing safety culture which are noted in the enclosed report.

Significant effort by the AOC has resulted in the closure of more than 96 percent of OSH hazards identified by the OCWR during the 117th Congress. Any 117th Congress biennial inspection findings that remain open continue to be prioritized for closure.

Do not hesitate to contact David Sapp at 202.341.9477 or me at 202.997.2595 with any questions or for additional information.

Sincerely,

Charles Iliff, P.E.
Director, Office of Safety and Code Compliance

Enclosure
Doc. No. 250116-03-02

APPENDIX C

Office of Compliance Guidelines for Risk Assessment Codes (RACs) – October 20, 2009

Office of Compliance (OOC) inspectors assign a risk assessment code (RAC) to each hazard encountered during routine inspections. The RAC describes the relative risk of injury, illness or premature death that could result from exposure to a hazard. RACs vary between a RAC 1 for a relatively high risk and a RAC 5 for an insignificant risk. Because the OOC does not identify hazards that have insignificant risks (*de minimis* violations), we do not have RAC 5 findings. A RAC uses a combination of the *probability* that an employee could be hurt and the *severity* of the illness or injury. The tables below outline the definitions of these elements and the process for combining the elements to determine a RAC. We use two methods: one for *safety* hazards, which could result in injuring an employee, and another for *health* hazards, which are conditions that could cause an occupational illness.

Table 1 shows the matrix used to determine RACs for safety hazards. The inspector finds the RAC by selecting the probability category from the first column and the worst-case severity category from the next four columns. The cell where the severity and probability descriptions intersect contains the appropriate RAC.

Table 1. Safety Risk Assessment Code Matrix				
Probability Categories	Hazard Severity Categories			
	I	II	III	IV
Likely to occur immediately (A)	RAC 1	RAC 1	RAC 2	RAC 3
Probably will occur in time (B)	RAC 1	RAC 2	RAC 3	RAC 4
Possible to occur in time (C)	RAC 2	RAC 3	RAC 4	RAC 5
Unlikely to occur (D)	RAC 3	RAC 4	RAC 5	RAC 5

The OOC has based the structure of the RAC tables (Tables 1 and 2) on information from John Zoldak of The Zoldak Group, Inc., and the definitions of the classifications and categories on the Department of Defense Instruction 6055.1, <http://www.dtic.mil/whs/directives/corres/pd2/i60551p.pdf>. The definitions of the Hazard Severity categories from the DOD Instruction are as follows:

Severity Category I: Death or permanent total disability.

Severity Category II: Permanent partial or temporary total disability; off work more than 3 months.

Severity Category III: Lost-workday or compensable injury.

Severity Category IV: First aid or minor supportive medical treatment.

RACs for health hazards require a more complex approach. Health RACs include factors such as exposure conditions, routes of entry, medical effects, exposure duration, and the number of employees exposed. Table 2 below outlines the RAC categories for health hazards and Tables 3

through 8 give the process for calculating the probability and severity categories for Table 2.

<i>Table 2. Health Risk Assessment Code Matrix</i>				
Probability Categories	Hazard Severity Categories			
	I	II	III	IV
Likely (A)	RAC 1	RAC 1	RAC 2	RAC 3
Probable (B)	RAC 1	RAC 2	RAC 3	RAC 4
Possible (C)	RAC 2	RAC 3	RAC 4	RAC 5
Unlikely (D)	RAC 3	RAC 4	RAC 5	RAC 5

To determine the Hazard Severity for Table 2, add the factors in Tables 3 and 4; then use Table 5 to select the category.

<i>Table 3. Exposure Points (for use in Table 5)</i>				
Is an exposure route other than	Exposure Conditions			
	< AL	Intermittently	> AL, but < OEL	> PEL
No	0 points	3 points	5 points	7 points
Yes	2 points	4 points	6 points	9 points
<p>“AL” is the action level, which usually requires training, medical monitoring, records, and other measures.</p> <p>“OEL” is the occupational exposure limit that applies to the situation. These limits include OSHA permissible exposure limits (PELs), threshold limit values (TLV®s) from the American Conference of Governmental Industrial Hygienists (ACGIH), and short-term exposure limits (STELs) and ceiling limits from either OSHA or the ACGIH.</p>				

<i>Table 4. Medical Effects Points (for use in Table 5)</i>	
Condition	Points
No medical effects (could include nuisance odors)	0
Temporary reversible illness requiring supportive treatment (e.g. eye irritation, sore throat)	1 to 2
Temporary reversible illness with limited period of disability (e.g., metal fume fever)	3 to 4
Permanent illness or loss of capacity (e.g., permanent hearing loss)	5 to 6
Severe disabling and irreversible illness or premature death (e.g., asbestosis)	7 to 8
<p>Note: Be sure to use the correct medical effects for exposure conditions.</p> <p>Use acute effects for exposures > STELs and chronic effects for exposures > time-weighted average PELs.</p>	

<i>Table 5. Health Hazard Severity Category (for use in Table 2)</i>	
Health Hazard Severity Category	Total Points from Tables 3 and 4
I	13 to 17 points
II	9 to 12 points

III	5 to 8 points
IV	1 to 4 points

To determine the Health Hazard Probability for Table 2, add the factors in Tables 6 and 7; then use Table 8 to select the category.

Table 6. Number of Exposed Employees (for use in Table 8)

Number of Exposed Employees	Points
< 5 exposed employees	1 to 2 points
5 to 9 exposed employees	3 to 4 points
10 to 49 exposed employees	5 to 6 points
> 49 exposed employees	7 to 8 points

Table 7. Exposure Duration (for use in Table 8)

Exposure Frequency	Exposure Duration (during a week)		
	1 to 8 hours/week	> 8 but < 30 hours/week	> 30 hours/week
Irregular, intermittent	1 to 2 points	4 to 6 points	8 points
Regular, periodic	2 to 3 points	5 to 7 points	8 points

Table 8. Health Hazard Probability Category (for use in Table 2)

Health Hazard Probability Category	Total points from Tables 6 and 7
Likely	14 to 16 points
Probable	10 to 13 points
Possible	5 to 9 points
Unlikely	1 to 4 points



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