HANSEN-RICE INC.
PLAN ▪ DESIGN ▪ BUILD

PROCESS SAFETY MANAGEMENT

Program Health Checklist

PSM PROGRAM HEALTH CHECKLIST

OVERVIEW

This checklist is a quick assessment designed to provide general guidance and spark collaborative discussion within your organization about the health of your PSM program and compliance resources. The checklist:

- Provides a high-level understanding of audit readiness.
- Helps identify existing or potential compliance gaps in your current framework.
- Prompts evaluation of internal and external capacity and competency to implement the program to its potential.
- Translates the core regulatory requirements into evidence verification checks:
  - OSHA 29 CFR 1910.119
  - EPA 40 CFR 68 (including the 2024 amendments)
  - IIAR 2, 4, 5, 6, 7, and 8

This assessment is not all-inclusive and does not replace the need for a complete audit of your PSM program to evaluate and quantify your risks and opportunities. For questions about this form, or for further audit information, please contact the HRI PSM team (see below).

HOW TO USE THE CHECKLIST

Recommendations:

- **360 Degree Perspective.** Distribute the checklist to key stakeholders within your organization, including leadership, management, and team members responsible for compliance.
  - Work through each item with your program in mind and ask for the mapped artifacts (policies, P&IDs, valve tags, relief registry, logs, and dashboards) that demonstrate implementation and current.
  - Based on the evidence, check one of the boxes that most closely aligns with your level of compliance (coverage) with that item.
- **Compile and aggregate** the data into the Health Snapshot table**.**
- **Collaborate** with team leadership to confirm gaps and set priorities to take corrective measures.
- **Connect** with Hansen-Rice, Inc. for a consultation.

Key Tips:

- The checklist below is evidence-based. Confirm if your program has mapped policies, procedures, drawings, registers, logs, dashboards, etc. for each checked item.
- See below for a Glossary of Terms and additional resources.

PSM PROGRAM HEALTH CHECKLIST

1. **Regulatory Alignment & Standards Adoption**
   The program is clearly mapped to OSHA 29 CFR 1910.119 and EPA 40 CFR 68 (including 2024 RMP amendments) and integrates IIAR 2, 4, 5, 6, 7, and 8 as the governing RAGAGEP framework.

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

2. **Integrated System Architecture & Documentation Control**
   All 14 PSM elements are implemented, linked, and traceable through accurate PSI (current P&IDs, valve tags, relief registry, and revision history) maintained under version control.

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

3. **Risk Analysis, Mechanical Integrity & Change Management**
   A structured PHA and STAA process feeds into a CMMS-driven Mechanical Integrity program, featuring a practical MOC/PSSR workflow that verifies readiness before startup.

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

4. **Competency, Training & Incident Preparedness**
   Operators, maintenance personnel, and contractors are trained and verified through recurring exercises. Root-cause analysis, incident investigations, and emergency drills are documented, with lessons learned.

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

5. **Governance, Dashboards & Continuous Improvement**
   Compliance audits, dashboards, and leadership reviews confirm that safety performance, MOC cycle times, and training metrics remain current and improve across operations.

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

6. **Leadership, Oversight & Performance Visibility**
   Executives maintain governance cadence through 3-year compliance audits, management reviews, and live dashboards that track MI on-time performance, training completion, MOC cycle time, and incident trends.

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

7. **Continuous Improvement & Accountability**
   Audit findings, training updates, and incident lessons learned are captured, acted upon, and rolled into revised procedures to sustain alignment with OSHA, EPA, and IIAR.

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

8. **Field-Ready Compliance Tools**
   Linked forms, dashboards, and logs connect construction handovers to operational PSM evidence (PSI, MOC, PSSR, MI).

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

9. **Program & Project Management Support**
   Coordinated oversight ensures implementation remains on schedule and audit-ready.

   Select One:

   - ☐ Yes: This is completely covered
   - ☐ Partial: Some covered and some gaps
   - ☐ No: (Not or mostly not) covered: Serious gaps

10. **Regulatory + Engineering Alignment**
    Projects are built to IIAR 2/4/5 and verified against OSHA PSM and EPA RMP Program 3 before startup.

    Select One:

    - ☐ Yes: This is completely covered
    - ☐ Partial: Some covered and some gaps
    - ☐ No: (Not or mostly not) covered: Serious gaps

11. **Design + Construction Integration**
Process safety requirements are embedded from concept through commissioning, reducing retrofit costs.

Select One:

- ☐ Yes: This is completely covered
- ☐ Partial: Some covered and some gaps
- ☐ No: (Not or mostly not) covered: Serious gaps

12. **Turnkey Documentation Package**
Delivered startup set includes P&IDs, valve tags, an SOP starter pack, training materials, and emergency plans.

Select One:

- ☐ Yes: This is completely covered
- ☐ Partial: Some covered and some gaps
- ☐ No: (Not or mostly not) covered: Serious gaps

13. **Post-Startup Governance & Coaching**
Structured audits, KPI reviews, and leadership touchpoints sustain compliance long after project closeout.

Select One:

- ☐ Yes: This is completely covered
- ☐ Partial: Some covered and some gaps
- ☐ No: (Not or mostly not) covered: Serious gaps

On the following page, compile your teams responses, showing a count for each of the 13 categories.

Compilation PSM Health Snapshot

(Tally Across All Participants and Enter the Total Number for Each Item)	#Yes	#Partial	#No
1. Regulatory Alignment & Standards Adoption			
2. Integrated System Architecture & Documentation Control			
3. Risk Analysis, Mechanical Integrity & Change Management			
4. Competency, Training & Incident Preparedness			
5. Governance, Dashboards & Continuous Improvement			
6. Leadership, Oversight & Performance Visibility			
7. Continuous Improvement & Accountability			
8. Field-Ready Compliance Tools			
9. Program and Project Management Support			
10. Regulatory + Engineering Alignment			
11. Design + Construction Integration			
12. Turnkey Documentation Package			
13. Post-Startup Governance and Coaching			
TOTAL			

Any significant gaps in your compliance may put the business at risk. For a full evaluation and assistance, contact Hansen-Rice, Inc.

Additional Resources:

Hansen-Rice, Inc. PSM Services

PSM Insights Articles

PSM Solutions Request

PSM Glossary of Terms