

RMI Insight

VOLUME 12 • NUMBER 2



Incident Management Everything Your Workplace Needs to Know About Recordables

BY MARK OLSON

Interpreting the ever-changing recordkeeping laws of OSHA can be a challenge for many businesses.

An employee trips over a pallet and experiences rib pain. A trip to urgent care reveals that he has no broken ribs, only some slight bruising. He does not receive any extensive care or administrative treatment. Is this a recordable injury according to OSHA?

Interpreting the ever-changing recordkeeping laws of OSHA can be a challenge for many businesses; however, failing to comply with

An OSHA recordable is an occupational injury or illness that requires more extensive medical treatment than simple first aid.

these regulations can carry severe penalty. Fines range from a minimum of \$5,000 to a maximum of \$70,000 for each willful violation. Additionally, refusing to address previous violations can result in penalties of up to \$7,000 per day.

These fines can quickly add up for workplaces with multiple violations. However, it has been proven that companies can avoid violations

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RMIPS UPDATES

Many things are happening within the Risk Management/Insurance Practice Specialty (RMIPS) and the Council on Practices & Standards (COPS), so I would like to bring you all up to date on changes and initiatives.

First, congratulations to Christine Sullivan who has been elected Vice President of ASSE's Council on Professional Development. Way to go, Christine! We know you will do well in your new role. Christine will step down as RMIPS Assistant Administrator, and Fran Sehn will take her place, per our operating procedures and a vote by COPS. With Fran taking on new responsibilities, Thad Nosal will become Publication Coordinator. Also, Leslie Batterson will become Conferences & Seminars Chair, while Mark Oldham will remain Body of Knowledge (BOK) Chair.



JIM NEWBERRY

You can do several things to help make ASSE's BOK successful. First, if you have not yet registered, please do so **here**. The BOK contains an RM/I topic area that we need RMIPS members to populate so we can share and access useful information. The BOK will be a continual, ever-growing project and product. We need your help in making this tool useful and rich in content. Also, as RMIPS members, you are not limited in what area you can contribute to (or access). Check out the **BOK** and be an active part of this exciting ASSE initiative.

As RMIPS Administrator, I am by default a member of the U.S. Technical Advisory Group (TAG) for Risk Management. One of my responsibilities is to represent RMIPS and ASSE in the development of the **ANSI/ASSE/ISO risk management standards**. Discussions about these standards are taking place on LinkedIn. Find a list of discussions by theme **here**.

Earlier this year, I gave a 2-day ISO 31000 workshop in Manama, Bahrain. **Click here** for an interview I conducted with *Professional Safety* about this workshop. If you would like to receive the resources I provided to workshop attendees, **send me an e-mail**.

The next standard in the works is ISO 31004: Risk management—Guidance for the implementation of ISO 31000. The implementation group, PC 262, was recently changed from a project committee to a technical committee by the ISO technical management board. A committee's scope is much broader and expands our responsibility so that we may work on more than one project.

One task will be to review the more than 600 comments received from the many delegations around the globe. I am excited about the implementation guide because it will provide organizations with methods and guidance on how to use ISO 31000. I also look forward to the TAG's March 2013 meeting at ASSE headquarters. ☺

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EVERYTHING YOUR WORKPLACE
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Companies can avoid violations by training management and supervisors on proper recordkeeping protocol. The key is to identify whether an injury is recordable, how to properly record workplace injuries and why this is important.



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By Geoffrey Peckham

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INCIDENT-FREE**

By Norman Ritchie

Concentrating your pretask planning process on influencing jobsite behaviors is an excellent way to avoid unplanned events



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Business Continuity Planning Can Save the Day & Your Company

The March 11, 2011, earthquake in Japan is just one in a series of catastrophic events that highlight the importance of the risk area known as continuation of operations. When combined with the financial pressures of the 2008 recession that changed many business models, ideas about business continuation are being tested like never before. This article outlines how business continuity planning can save the day and your company.

The terrorist attacks of Sept. 11, 2001, on the World Trade Center in New York City, followed by the 2004 hurricane season that devastated the Gulf Coast and the 2011 Japan earthquake have escalated this attention by businesses. Now, businesses are asking themselves not how long it will take to recover operations but whether the business will survive.

Client expectations to validate that a business can deliver as promised have also added to this increased attention. Many companies require a business continuity plan (BCP) in most requests for proposals before they even consider doing business with a prospective client. When Wal-Mart generates 60% of a company's business and wants a guarantee that the company can deliver a certain number of products after suffering a CAT loss, most businesses will develop a plan.

Regulatory agencies had little to do with this increase in focus; however, some risk managers cited the Sarbanes-Oxley Continuation of Operations section as a motivator primarily in the financial community. ISO 17799 has also been developed as a suggested outline for BCPs.

All of these items have contributed to the business continuation risk control focus. However, the most important has been the change within current business models. Downsizing, the consolidation of facilities, the outsourcing of manufacturing and the increasing globalization of markets have increased not only the exposure, but the perception of risk at the CEO level, as well as to the risk manager. A single catastrophic claim can now devastate a company, when in the past, it might simply have slowed production for a week.

Following are some examples of increased exposures in business continuation:

- A truck load trucking company, with more than

2,500 power units delivering products to 48 continental U.S. states, employed three dispatch and customer service centers. Each center housed an independent computer server, which mirrored the others.

To save cost, all customer service and dispatch employees were moved to a single Midwest location in the heart of Tornado Alley. Should the company experience a total loss, all 2,500 trucks are shut down. Downstream clients awaiting products and loads also experience loss and are likely never to ship with the carrier again.

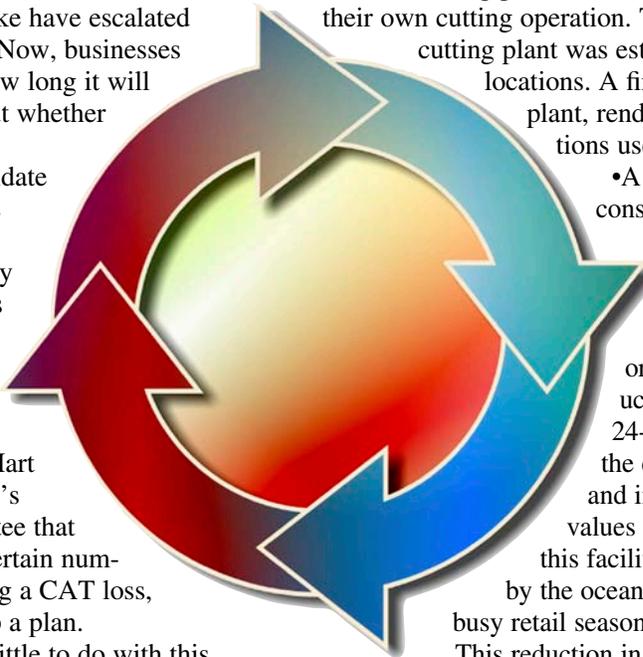
- Ten sewing plant locations in Mexico employed their own cutting operation. To save cost on staff, one cutting plant was established, serving all 10 locations. A fire destroys the cutting plant, rendering all 10 sewing operations useless.

- A distribution company consolidated four regional warehouses into a 1 million-square-foot supercenter with a state-of-the-art electronic order picking and product conveyor system. This 24-hour operation reduced the employee number by half and increased the onsite product values fourfold. An earthquake at this facility or a regional labor strike by the ocean cargo company during the busy retail season could be devastating.

This reduction in the spread of risk to control expenses has led to new exposures in addition to the existing natural and manmade catastrophic risks. The movement by business to a more outsourced supply chain production process has reduced companies' control of risk and has increased the contingent business interruption exposure. However, just because the exposure has increased does not necessarily mean that the risk is uncontrollable. As we are taught in basic risk management, we must do a threat assessment evaluating the likelihood of the event and the magnitude of a loss should the event occur. This basic risk control philosophy can be applied in business continuation risk control.

DISASTER PLANNING VS. BUSINESS CONTINUITY PLANNING

There can be a lack of understanding of business continuation risk. Often, the terms *disaster planning* or *emergency response* plans are used in the same con-



text. The disaster and emergency response plans are components of the BCP. The disaster and emergency plan are immediate activities at the time of the catastrophic event to minimize loss and to control human survival.

BCP is the long-term plan to return business operations to an acceptable level.

Disaster Recovery Journal, a trade publication in the BCP community, has defined business continuity planning as:

“Business continuity planning goes beyond disaster recovery planning to include the action to be taken, resources required and procedures to be followed to ensure the continued availability of essential services, programs and operations in the event of unexpected interruptions.”

“The continued availability of essential services” is the key phrase. Each department, location and division has a defined essential service product: payroll to process checks, dispatch to communicate to trucks where to pick up, a cutting plant to provide parts to the sewing plant and the distribution center to receive product, store, pack and then ship. As the supply chain grows, the essential services grow.

Thus, the key to BCP is a detailed understanding of all essential services within all aspects of completed operations. Once these essential services are prioritized from a return time objective (RTO), contingencies can be established for the actions taken, resources required and procedures followed.

Tools available for identifying essential services, RTOs, actions taken, resources required and procedures followed are known as business impact analysis (BIA).

Once we have an understanding of the potential risk, we can plan to establish contingencies to minimize downtime to meet our RTO. The worst time for this planning is at the time of the event. Having a good understanding of the essential services throughout the entire operation, with identified RTOs, is key. BCP

Table 1 Business Continuity Planning: Major Steps

Foundation	Identification	Decision	Plan Development	Training & Exercise	Maintenance
Obtain management support.	Conduct risk/threat assessment.	Determine the gaps between recovery requirements and current capabilities.	Assemble the information gathered and decisions that have been made.	Educate plan owners on how to use the plan and what to do in disaster and recovery situations.	Identify changes that will require plan updates.
Identify planning team and initial planning information.	Conduct the business impact analysis.	Analyze and choose recovery strategies to achieve return time objective.	Develop business continuity plan (BCP) narratives and links to dynamic plan components.	Develop and exercise scenario.	Establish a maintenance program.
Develop project plan.	Identify supply chain dependencies.	Analyze the organizational structure to implement the recovery team scheme (i.e., who does what and how).	Document BCP and wallet card.	Develop exercise plan and tools.	Provide an automated tool to keep the plans up-to-date.
Issue project initiative letter.	Identify and collect the continuity and recovery resource data.		Publish BCP and wallet card.	Conduct exercise.	Develop letters concerning the enhanced plans for employees and external partners/vendor
Conduct project kickoff meeting.				Identify lessons learned for updates to the plan.	

DELIVERABLES

Project initiation letter	Risk/threat assessment	Gap analysis	Plan template	Trained plan participants and owners	Maintenance program
Project kickoff meeting	Business impact analysis	Recommended recovery strategies	Documented BCP manual	Exercise scenario, plan and tools	Software to keep plans up-to-date
Project plan	Supply chain dependencies	Recovery team scheme	Documented BCP wallet card	Awareness exercise	Letters for employees and partners/vendors
	Collected resource data	Recovery tasks			

began in the information technology world, where companies understood they must have access to their data processing center. The RTO was typically only a few hours. Therefore, backup tapes and hot-site data centers were installed with regular testing. Now, with increased risk, the same risk control efforts must be applied to all identified essential services.

STEP-BY-STEP PROCESS

Risk assessment is the first step in the BCP develop-

ment process (Table 1). This assessment must be performed by the individuals who perform and control the identified essential services. Many outside consulting companies will offer this assessment, but because BCP is a dynamic process, with the essential services always subject to change, it is best that training is provided to perform the assessment rather than a third party providing a static document valid at a single point in time.

Once the essential services have been identified and threats to these services understood through the BIA, move to the “what if” step. This decision process evaluates possible essential service disruption. After the potential effect, determine what actions will be taken, what resources will be required and what procedures will be followed to meet the established RTO so that essential services may continue. This is the internal planning process—playing “what if.” Now we understand the risk and have identified our needs to continue by location, department and division. At the time of the event, even if we did not plan for the exact “what if,” we will be ready to handle the crisis, modifying our existing resources.

The third step is formal plan development. This is where the appointed executive team can prioritize the locations, department, etc., and possibly modify RTO. Each department evaluates itself, where the planning team prioritizes the global RTO for each identified unit. Formalizing the plan with a method for updating is a continual process.

The final phase is testing and training exercises. Will our plans work as planned? Various tools are available for this, from tabletop exercises to a full-blown plant shutdown.

SUMMARY

The key steps in the business continuity planning process are:

1) Identify essential business services and products, evaluate potential threats to these services and establish an RTO for each essential service. This must be done internally with direction and consultation by professionals. The initial assessment is critical to instill the potential risk understanding and appreciation among those who will be required to perform at the time of a CAT event.

2) Perform a threat assessment to evaluate and rank potential risk to the identified essential services. Even though the risk exists, the potential may be minimal.

3) Play “what if” to develop plan contingencies. Identify the key needs to recover and appoint necessary personnel with assigned tasks.

4) Appoint an executive-level management team to develop a corporate global plan and install a method to update risk assessment and contingency plans. ☺

Steve Updegraff works for Lockton Companies LLC. He is a professional member of ASSE, the Risk Management Practice Specialty and the Heart of America Chapter.



Best of the Best

Congratulations to Gary Eaton and Donald Little on the selection of their article, “Aligning Risk Assessment and Risk Mitigation Methodology With Business Processes,” as one of 17 articles in the 2011-12 *Best of the Best* publication. **Click here** to view this compilation of top technical material. **Click here** for more information on the groups represented in this publication or **here** to add a practice specialty to your ASSE membership.



Recommended Reading

- Workers’ compensation privatization.
- Loss control toolkit.
- Enterprise risk management.
- Minimizing risk.

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Using Safety Communication Tools to Reduce Asbestos Risk

Asbestos is the name given to a group of naturally occurring minerals resistant to heat and corrosion. Until the 1970s, it was widely used in the construction of a variety of products; from vehicle brake pads to building materials (like roofing, ceiling and floor tiles, and insulation). Once known as the “miracle mineral” for its fire-retardant capabilities, asbestos is now well-recognized as a health hazard and its use is highly regulated by OSHA and EPA. This article explores the role of visual communication in improving workplace safety and will use the risk of exposure to asbestos as the starting point for illustrating how new safety sign design best practices work.

For safety to be increased, effective communication of asbestos hazards in the workplace is imperative. Safety signs and labels, when designed well, can be a powerful tool for safety professionals.

UNDERSTANDING THE HAZARD & LIABILITY ISSUES

When asbestos-containing materials are disturbed, such as during the repair or remodel of structures that have been built with asbestos, microscopic fibers are released into the air. These fibers can be inhaled into the lungs. Inhaling asbestos fibers can lead to disabling and sometimes fatal diseases, including lung cancer, gastrointestinal cancer, mesothelioma and an emphysema-like condition called asbestosis.

Because of the variety of products asbestos was once used in, exposure to it now can occur in many industries and workplaces. According to OSHA, heavy exposure tends to occur in the construction industry and in ship repair, especially during the removal of asbestos-containing materials. Exposure also occurs during the manufacturing of asbestos products and during automotive brake and clutch repair work.

While asbestos use peaked in the 1970s, asbestos is still a workplace health issue and liability problem and will be for years to come. This is due to both the long latency period from asbestos exposure to symptom onset and because workers continue to be exposed to asbestos hazards. The facts and figures confirm the problem: asbestos is known to be the **number one cause of occupational cancer** in the U.S.; 10,000 people die each year in the U.S. from **asbestos-**

caused diseases; an estimated 1.3 million construction and industry workers are currently **exposed to asbestos on the job**; and litigation related to asbestos is said to be the longest-running **mass tort litigation** in U.S. history.

PROTECTIVE OSHA REGULATIONS

For safety to be increased and for liability risk to be reduced, accurate, effective communication of asbestos hazards in the workplace is imperative. To improve workplace safety, including safety communication, OSHA has three asbestos standards aimed at better protecting specific types of workers—one for general industry, one for the construction industry and one for shipyards. These standards require that employers take certain measures to reduce workplace risks, including the following:

- Provide personal exposure monitoring to assess risk.
- Provide hazard awareness training for operations where any potential exposure to asbestos exists.
- Airborne levels of asbestos are never to exceed legal worker exposure limits (0.1 fiber per cubic centimeter of air, averaged over an 8-hour shift). If the exposure exceeds this limit, employers are required to further protect workers by:
 - a) establishing regulated areas, controlling certain work practices and instituting engineering controls to reduce the airborne levels;
 - b) ensuring that exposure is reduced through administrative controls and PPE requirements;
 - c) medical monitoring of workers (when legal limits and exposure times are exceeded).

THE CRUCIAL ROLE OF SAFETY SIGNS

Safety signs and labels fit into the previous in several key areas. Per OSHA’s standards, warnings signs must be displayed at each regulated area, and warning labels must be placed on all asbestos products, containers and installed construction materials when feasible. In addition, while not a requirement, signs can be used to supplement safety training and safety rules (like PPE requirements) as a permanent, physical and visual reminder, reinforcing the importance of safety at the point of potential interaction with the hazard.

TWO NEW SAFETY COMMUNICATION TOOLS

When it comes to better communicating hazards to reduce risk and improve safety, be aware that two new

“best practices” are available for the design of safety signs and labels. The first tool is the 2011 ANSI Z535 standards. Most safety professionals are unaware of these standards. The ANSI Z535 standards define a logical, systematic way in which safety signs should be designed and how they should be formatted and also offer a framework on which to define their proper content. The ANSI Z535 standards’ goal is to give safety professionals a national, uniform system for effectively communicating critical safety messages—a system that is far superior to what is typically found in today’s workplaces.

The second tool to be employed in this effort to better communicate safety is the new international language of graphical symbols. Safety symbol standardization is primarily done by the International Organization for Standardization, although the International Electrotechnical Commission and the United Nations (UN) also play a role in this work. The science behind using signs and symbols to communicate specific messages is a field of study called semiotics. One goal of a safety professional should be to effectively use semiotics to alert people to safety-related information, including the reinforcement of safety training and rules promoted in the company. Intelligently applying semiotics to achieve these aims will make a difference.

ANSI Z535.2, Standard for Environmental and Facility Safety Signs, is the primary standard for workplace and public area safety signs in the U.S. It has been updated over the last 2 decades to include principles derived from human factors research on how people comply with visual messages. This standard also contains warning content guidelines grounded in U.S. case law that has refined the definition for what constitutes an “adequate warning.”

However, most facility safety signs in place today do not comply with this best practice standard. The result is that they only communicate partial information and safety could be seriously compromised. The newer sign design methodology, as defined in the ANSI standards, is different. It is more involved and more refined. Safety signs built on the ANSI Z535 platform:

- convey the nature of the hazard, the consequence of interaction with the hazard and how to avoid hazard;
- include color-coded signal words that convey the level of risk as measured by a combination of probability and severity. These signal words also draw attention to the sign;
- better accommodate symbols to communicate across language barriers and draw attention to the sign.

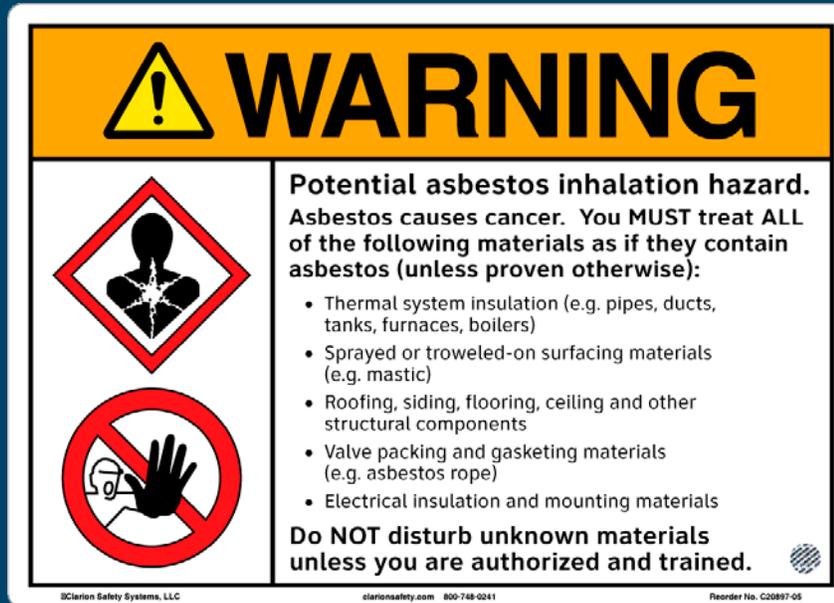
SEMIOTICS, SYMBOLS & THE ANSI Z535 STANDARDS APPLIED TO ASBESTOS WARNINGS

To illustrate how the ANSI Z535 standards and graphical symbols combine to provide a better means

Figure 1 Old OSHA-Style Safety Sign



Figure 2 New ANSI-Style Asbestos Safety Sign Developed by Clarion Safety Systems (©2012)



of communicating safety, look at asbestos hazard signs. To date, most asbestos safety signs have been characterized by general messages (Figure 1). This style of sign is based on 1941-era sign standards for its formatting (the same standards that were the predecessors of the ANSI Z535 standards). Clarion recently designed an ANSI Z535-style asbestos warning sign (Figure 2) for a company in the metal and mining industries. This particular customer was in need of new safety signs for one of its manufacturing plants, where they were to be placed on the doors of rooms with asbestos-containing materials.

Specifically, here are the key areas where the



Because of the variety of products asbestos was once used in, exposure to it now can occur in many industries and workplaces. According to OSHA, heavy exposure tends to occur in the construction industry and in ship repair, especially during the removal of asbestos-containing materials.

OSHA-style sign falls short in effectively communicating safety and where the new ANSI-style sign better conveys information:

- The OSHA-style sign is overly simplified in its content, showing only partial information about the hazard and little information about how to avoid the hazard. In contrast, the new ANSI Z535 sign is content-rich, explaining much more about the risk, where it can be found, and, in its last line, stresses the primary way in which to avoid the hazard.

- The OSHA-style sign uses DANGER as its signal word when WARNING is more in line with today's risk assessment methodologies. The ANSI Z535.2 standard contains a signal word/risk matrix that defines the signal word DANGER's use as when you have a situation where disobeying the sign will result in serious injury or death. This being the case, the standard says that the DANGER signal word should only be used in the most severe instances. In contrast, the signal word WARNING is used on safety signs to indicate hazards that could cause serious injury or death, and this is the case for the asbestos safety sign. The new sign uses WARNING and its appropriate ANSI Z535 orange background color.

- The OSHA-style sign does not use graphical symbols—a best practice that is rapidly being adopted for all types of warning messages worldwide. The goal is to communicate important aspects of the message to all people, across language barriers. The new ANSI-style sign does this by using the new UN/OSHA Globally Harmonized System symbol for “Health Hazard” and a symbol that is commonly used internationally to indicate “No Access for Unauthorized Persons.”

The objective of the new sign's design is to more fully warn workers of the potential risks associated with asbestos so they can make good decisions to avoid accidents and injury. Imagine the following situation: you are a worker in the metal manufacturing plant, about to enter an area that contains asbestos, and your job is to replace ceiling tiles. You see the old, OSHA-style sign. From the information provided, you decide that you can work with the materials at hand

and you will try to avoid creating dust. Yet you are unaware that merely disturbing asbestos-containing materials may create fibers in the air that can expose you to a life-threatening illness. This goes unsaid on the old sign. You were not told exactly what the hazard was, where you would find it or that you needed proper training to avoid it. The new sign provides this information, and in doing so, it goes a step beyond giving you the “right to know” that a hazard exists—it gives you the “right to understand” what the hazard is and how to avoid it. That is the power behind the new safety sign systems.

From an overall view of things, it is important to keep in mind that not all hazard signs, including asbestos signs, will have identical content. The field of safety signs will no longer be characterized by a “one size fits all” mentality. Properly applying the ANSI Z535 standards means thinking about what the safety signs should say so they clearly identify hazards and display the right information pertaining to safety procedures, hygiene rules and PPE requirements. Some of this information will vary from company to company because work environments, rules and internal best practices are different. Tailoring safety signs to meet specific safety communication needs is the right course of action because the goal should always be to give people the precise information they need to make well-informed decisions.

CONCLUSION & A CALL FOR COLLABORATION

Safety signs and labels, when designed well, can be a powerful tool for safety professionals in a broad range of industries to promote a culture of safety, reduce business risk and protect people. The hazard topic discussed here, asbestos, is just one example of how effective visual safety communication can help improve workplace safety.

As a follow-up to this article, please submit safety issues or hazard challenges you think could benefit from the development of a new ANSI Z535-compliant safety sign. Subsequent *RM/Insight* articles will feature the “old” and “new” signs so Risk Management/Insurance Practice Specialty members can see the benefits of using the new standards to achieve specific safety communication objectives. The overall goal in this effort is to help establish new benchmark safety signs that both meet the latest standards and use the best practice design principles of semiotics to communicate safety. To submit your ideas, [click here](#). ☉

Geoffrey Peckham is a longtime member of ASSE and president of Clarion Safety Systems. He is chair of both the ANSI Z535 committee and the U.S. Technical Advisory Group to ISO Technical Committee 145: Graphical Symbols. Over the past 2 decades, he has played a role in the harmonization of U.S. and international standards pertaining to safety signs, colors, formats and symbols. This article and the sign images on p. 9 are courtesy of Clarion Safety Systems ©2012. All rights reserved.

Who can I ask about sound noise and machinery used in manufacturing?

Do you have information about the hazards and exposures of anhydrous ammonia used during manufacturing?

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Risk Management Standards in the Middle East

Jim Newberry, Administrator of ASSE's Risk Management/Insurance Practice Specialty and ASSE's representative on the U.S. Technical Advisory Group for Risk Management, discusses how the ANSI/ASSE/ISO risk management standards are used in the Middle East and how the U.S. can better integrate the standards into risk management practices.

RMIPS: Please provide a brief description of your professional background and of your position as assistant vice president and risk control manager for Island Insurance Co. Ltd. in Honolulu, HI.

JN: I have 30 years' experience in commercial insurance company loss control. I started my career in loss control at Employers Mutual Casualty Company and then worked for Home Insurance Company, Zurich Insurance Company and



Fireman's Fund where I held various field, management and home office positions. I am currently assistant vice president and risk control manager for Island Insurance Company. I am also an OSHA Training Institute instructor with the

University of California-San Diego Extension and ASSE's RMIPS administrator.

RMIPS: You presented on the ANSI/ASSE/ISO risk management standards at the ASSE Middle East Chapter's professional development conference in Manama, Bahrain. In what ways are these standards used in the Middle East?

JN: The conference attendees with whom I interacted were mostly just aware of the ANSI/ASSE/ISO risk management standards, and a few were actively using them in their organizations. Khaled M. Bu-Allay, an officer with the Royale Bahraini Air Force, shared that he was using the risk management standards in his Ph.D. dissertation research on errors in military aviation. Also, several papers were presented at the conference on related topics, such as the use of risk assessment and risk matrices.

RMIPS: How was your presentation received? What were the most common questions attendees had about the ANSI/ASSE/ISO risk management standards?

JN: I received very positive feedback from attendees of my two-day preconference workshop, many of whom also came to my professional development conference presentation, which had more than 100 in attendance, standing room only. The risk assessment tools in the ANSI/ASSE/IEC/ISO 31010 standard were of particular interest; it seems that many of the companies in the Gulf region are requiring their risk management and safety staffs to conduct risk assessments of work areas and processes, much of which is in context with process safety management.

RMIPS: How are the ANSI/ASSE/ISO risk management standards being applied to areas, such

as security risk assessment and aviation, in the Middle East?

JN: David Moore's presentation on security risk assessment tied ANSI/API Standard 780? Security Risk Assessment directly to the ANSI/ASSE/ISO framework and process.

RMIPS: Based on your time spent in the Middle East, do you feel the U.S. could make better use of the ANSI/ASSE/ISO risk management standards? Is the Middle East using them in ways not previously seen here in the U.S.?

JN: I have seen minimal acceptance/utilization of the ANSI/ASSE/ISO risk management standards in the U.S., although I was pleased to discover that they have been incorporated into the Institute of Internal Auditors' risk management review process. I was surprised to see its use in some selected areas in the Gulf region. It is a well put-together standard that shows a maturation of the discipline and pulls together differing ideas about risk management from around the globe in a cohesive manner. It presents a utilitarian set of methodology for management to improve their decision-making process, with major implications for corporate governance.

RMIPS: What other regions of the world do you believe could benefit from use of the ANSI/ASSE/ISO risk management standards?

JN: I feel that the ANSI/ASSE/ISO risk management standards will



What Are the ANSI/ASSE/ISO Risk Management Standards?

ANSI/ASSE/ISO Guide 73 provides definitions of generic terms related to risk management. It aims to encourage a mutual and consistent understanding of, and a coherent approach to, the description of activities relating to the management of risk and the use of uniform risk management terminology in processes and frameworks dealing with the management of risk.

The guide is intended to be used by those engaged in managing risks, those who are involved in activities of ISO and IEC and developers of national or sector-specific standards, guides, procedures and codes of practice relating to risk management.

ANSI/ASSE/ISO 31000 can be used by any public, private or community enterprise, association, group or individual. It can be applied throughout the life of an organization and to a wide range of activities, including strategies and decisions, operations, processes, functions, projects, products, services and assets. It can also be applied to any type of risk.

Although the standard provides generic guidelines, it is not intended to promote uniformity of risk management across organizations. Design and implementation of risk management plans and frameworks will need to take into account the varying needs of a specific organization, its particular objectives, context, structure, operations, processes, functions, projects, products, services or assets and specific practices employed.

ANSI/ASSE/IEC/ISO 31010 is a supporting standard for Guide 73 and provides guidance on selection and application of systematic techniques for risk assessment. Risk assessment carried out in accordance with this standard contributes to other risk management activities. The application of a range of techniques is introduced, with specific references to other national and international standards where the concept and application of techniques are described in greater detail.

It should be noted that the standard is not intended for certification, regulatory or contractual use. It does not provide specific criteria for identifying the need for risk analysis, nor does it specify the type of risk analysis method that is required for a particular application. This standard does not refer to all techniques and does not deal specifically with safety. It is a generic risk management standard and any references to safety are purely of an informative nature.

for a needed improvement. I realized through the process of reading and digesting the standards in preparation for my presentation that it really is about helping management make well-informed decisions.

I may be going against the grain with the idea that you can use parts of the standard that suit you, but as in all disciplines, it is best to be on the path and to learn to crawl and walk than to not be moving in the right direction. I think any use of

this standard will help build credibility and the expanded use of it in organizations. In this regard, the third section of the standard addressing risk assessment techniques provides a broad set of tools that can be used effectively in SH&E arenas, which is much of what my workshop attendees were looking for.

RMIPS: *You are ASSE's RMIPS administrator. How have you and the RMIPS membership worked to*

gain traction where there is pressure in legislation for organizations to establish effective due diligence and corporate social responsibility controls. Due to its well-written universality, it can be used at both the macro and micro level and will help any organization, its project or its task provide good decisive information to decision-makers. Because it is not a certification-related standard, it does not offer the same level of qualifications for international trade as some ISO standards; however, it provides best practice guidelines that international markets could rely on as credible business screening practices for international trade.

I think more so that the ANSI/ASSE/ISO risk management standards offer an effective corporate governance framework that organizations can use to fulfill any legislative obligations they may need to meet and can also be used to establish decision processes that document sustainability requirements like those needed for GRC, which can put an organization in a position of being a preferred investment for those choosing to invest in socially responsible and green organizations.

I feel the standards will be useful in developing countries, but it may be difficult to use them there due to the level of transparency this model projects. High-risk oil production operations will benefit from using the standard as will chemical and pharmaceutical industries.

RMIPS: *What new ideas or best practices will you take from the Middle East conference and apply to your own risk management work with Island Insurance?*

JN: One idea I espoused was that one can take any part(s) of the ANSI/ASSE/ISO risk management standards and use them at whatever level your organization or projects are able to accept or use. In that respect, I have already taken an issue that I wish my management to address and have applied a risk assessment instrument from ANSI/ASSE/IEC/ISO 31010 standard in preparation to sell my suggestion

RESOURCES

- ANSI/ASSE/ISO Risk Management Standards Package
- Interview with Dorothy Gjerdrum
- Interview with Dorothy Gjerdrum & Wayne Salen
- List of ISO 31000 LinkedIn Discussions
- SH&E Standards Digest (Vol. 2 No. 2)

promote use of the ANSI/ASSE/ISO risk management standards?

JN: I think that RMIPS's involvement in promoting the ANSI/ASSE/ISO risk management standards has been somewhat organic. Christine Sullivan, RMIPS assistant administrator, and I have responded to requests we have received for presentations. Through these requests, we have both elevated our knowledge about the standards and would like to do more to bring them out into the open because we find that they are not as well-known as they could be. One unique thing the standards provide to ASSE members and other practice specialties is a great set of tools for examining risks that need to be addressed across the board. Further, with the ever-growing competition to get issues raised to the boardroom level, risk management can be a universal vehicle to bring all types of practice specialty area issues to top management for consideration.

RMIPS: *You are also a member of the U.S. TAG for Risk Management. What are the TAG's plans for the year? Will any new standards be added to the ANSI/ASSE/ISO standards series?*

JN: Yes, Christine and I are on the TAG, as ASSE is the secretariat for this standard and RMIPS leaders were chosen to represent ASSE on the committee. Exciting things are coming down the pike, for example, the first international conference on the ISO 31000 standard will be held in Paris in May and there is continued development of ISO 31004, our implementation guide. It will continue to take shape over the next year and is expected to be complet-

ed sometime next year. Meetings on the implementation guide took place in London last year and just recently in Dublin. The implementation guide will help risk management personnel and organizations better understand how to use the risk management framework and process and to integrate it into the decision-making process.

RMIPS: *What other tools or standards do SH&E professionals in the Middle East use to assess or manage risk?*

JN: Process safety management is very big in the Gulf region due to oil production, processing and distribution. I saw the presence of six sigma, systems safety, hazop, DuPont, AS 4801 and OHSAS 18001 at the conference, and there definitely is a hunger for good effective risk assessment tools in the region. ISO 31000 was known but not widely used, and people were interested in learning about it.

RMIPS: *Do SH&E professionals in the Middle East have a different perspective toward ISO standards? Do you believe there is a greater or lower level of acceptance?*

JN: Because the region is steeped in international trade, ISO standards are required to conduct business and are widely accepted. Some questions arose as to whether the ANSI/ASSE/ISO standards were certification-type standards. I needed to dispel those inquiries but at the same time support the utility of the risk management standards as viable in establishing organizational credibility and suggest that large business as well as countries look to the standards as a means to measure organization effectiveness at some point in the future.

RMIPS: *In the U.S., much debate surrounded technical issues in the ANSI/ASSE/ISO standards, such as the definition of risk appetite. Do SH&E professionals in the Middle East express the same level of concern for similar technical issues?*

JN: The players with whom I interacted in the Middle East are less aware of this history of enterprise risk management and the varying models that have been developed around the globe over the years. They seem more concerned with using aspects of the standards within the context of process safety, for example, and how it can advance their work practices. When I presented information on risk appetite and brought out the change that the ANSI/ASSE/ISO standards bring to the table, I said that I see it as a maturation of the concepts and principles that help make a more utilitarian standard.

RMIPS: *Did your visit to the Middle East give you some new ideas as to how the ANSI/ASSE/ISO standards could be revised and improved in the long run?*

JN: I look forward to the implementation standard, as the standard in its current form is framed in an organizational context, which did not seem practical for engineers, safety practitioners, etc., who were looking for practical tools they can use back on the job. In this regard, I extolled the notion that various parts of the standard can be used at the micro level and are useful when used in a context associated with specific objectives and with the right risk assessment tool. This can provide users with a methodology that in a way covers their tracks by providing management with information at the project and task level that incorporates the limitations of the analysis, both from a time and resource perspective.

Many expressed that timeframes and resources were in short supply and that projects needed to move along at an acceptable pace in some instances, so when we discussed the details of the risk process, the ?risk evaluation? piece provided a way for me to explain that when they communicate to management, they need to be truthful about their risk assessment work products. So I would not say that I learned as much about

how the standard could be revised as much as how to make it work for the user in very practical and specific ways. But I feel it will be important for organizations and practitioners to have a guide to help them with implementation since it is pretty heady material and requires top-level organizational leadership buy-in as well as risk management expertise.

Further, understanding context and application of the risk management process to specific objectives is not easy to comprehend at first. I will be looking for examples of risk logs/risk registers that can provide examples of objectives at various levels of an organization to which the risk management process can be applied and also examples of risk management objectives that can be applied to these organizational objectives. It is confusing to apply all of the right actions in the right order and then keep track of it all. However, as one gets acquainted with the ANSI/ASSE/ISO standards, one will see that it provides a landscape of accountability and transparency, which can lead to exceptional and credible decision-making.

RMIPS: How do risk management philosophies and concepts in the Middle East differ from those in other countries?

JN: Because the Middle East is international in the makeup of people who work there as well as the international commerce that takes place, many resources are brought to the table to make sure that things are done in a responsible manner. My impression of risk management there is that it is used at a practical level and needs to find its way into upper levels of organizations where big decisions are made. Power is autocratic over there and somewhat absolute at top levels, so the idea of bringing risk-based thinking to the powers that be is a bit idealistic.

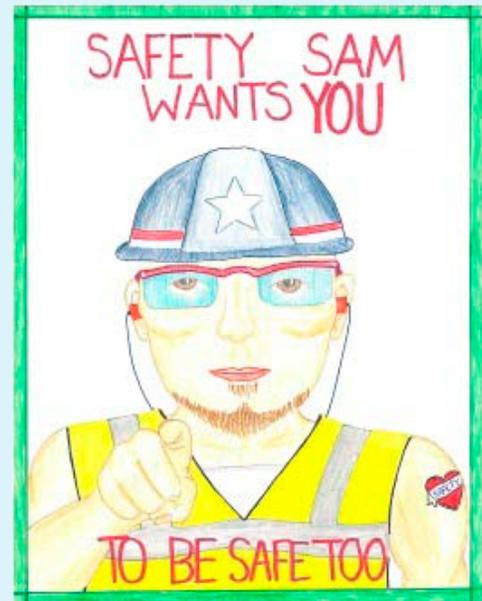
Contrary to this viewpoint, I have heard that ACWA Power, a power-generating and desalinated water production company in the Kingdom of Saudi Arabia, has

adopted the standard as well as ISO 14001 (Environmental Management Systems). According to my source, ACWA Power says the link between corporate governance and business is key to meeting its expansion plans.

RMIPS: Did your presentation attendees have any specific comments or concerns about the ANSI/ASSE/ISO standards that should be considered in the future?

JN: While a few attendees were risk managers and a few were change agents, most were operational personnel who were looking for tools to use in the risk assessment tasks that they needed to complete back on the job. The 31 risk assessment instruments described in ANSI/ASSE/IEC/ISO 31010 were very useful in addition to the actual risk assessment tools I provided to attendees on many of the instruments. For the most part, they found the principles and framework to be esoteric. To be fair though, those who expressed this point of view were not responsible for establishing organizational policy nor did they feel they could affect things at the macro level. In this regard, I did not gain any insights that might be useful to the standard's evolution, but we need to make sure that the standard remains relevant to risk management personnel as well as to operational personnel. ☺

Jim Newberry has 30 years' experience in commercial insurance company loss control. He started his career in loss control at Employers Mutual Casualty Company and worked for Home Insurance Company, Zurich Insurance Company and Fireman's Fund where he held various field, management and home office positions. He is currently assistant vice president and risk control manager for Island Insurance Company. He is administrator of ASSE's Risk Management/Insurance Practice Specialty, ASSE's representative on the U.S. Technical Advisory Group for Risk Management and an OSHA Training Institute instructor with the University of California-San Diego Extension. He is also a recipient of the ASSE Hawaii Chapter's Safety Professional of the Year award. Newberry holds a B.S. in Environmental Safety and Safety Management from Indiana State University.



Last year's first place winner, Abigail Helser

2013 Poster Contest

Children ages 5 to 14 will have the opportunity to illustrate the importance of safety by entering the 11th annual ASSE Safety-on-the-Job kids' poster contest. The contest aims to teach children about the importance of being safe at work and what occupational SH&E professionals do to protect people, property and the environment.

The contest is open to all children sponsored by an ASSE member. ASSE members can sponsor family members, schools and the children of their coworkers. Those seeking an ASSE member to request sponsorship can check with their local ASSE chapter by clicking [here](#) or by sending an e-mail to customerservice@asse.org.

The winning poster from each of the five age groups is featured on the annual North American Occupational Safety and Health (NAOSH) Week poster distributed worldwide, at NAOSH Week events and at Safety 2013. The five grand-prize winners and 15 runners-up each receive prizes and are recognized at NAOSH kickoff events in May 2013 and worldwide through ASSE communications and publications. The posters that best illustrate safety on the job will win the contest. Click [here](#) for contest rules and information. Entries are due by Feb. 14, 2013. ☺

ASSE Volunteer Leader Named One of the 100 Most Influential People in Finance



ASSE member Dorothy Gjerdrum was named to *Treasury & Magazine's* 2012 "100 Most Influential People in Finance" list.

The annual list honors high-ranking financial professionals, including CFOs, financial professionals, bankers, lobbyists, government agents and risk managers, who have developed innovative ways to make their companies successful and to improve the economy.

Gjerdrum, executive director of the public entity and scholastic niche for Arthur J. Gallagher and Co., also chairs of the ANSI/ASSE U.S. Technical Advisory Group (TAG), which is responsible for the U.S. position on the ISO risk management and risk assessment standards. These standards provide universal principles and guidelines for practitioners and companies employing risk management and risk assessment processes. They also are increasing in importance in U.S. business and industry, and the **ANSI/ASSE/ISO risk management standards** are having an impact worldwide.

As TAG chair, Gjerdrum leads the committee in writing, editing and review of these important international standards.

In addition, she represents the U.S.'s views at work group meetings. "We are still in the beginning stages of adoption of ISO 31000 in the U.S., and this will bring more attention and awareness to it," says Gjerdrum of her recognition.

Treasury & Risk Magazine is a monthly business-to-business publication that provides updates on trends, best practices and tools that are defining the future of finance and treasury by profiling treasuries and finance departments across the nation.

Click here to read an interview with Dorothy Gjerdrum. **Click here** to read an interview with Dorothy Gjerdrum and Wayne Salen. ☺



The **Environmental Practice Specialty (EPS)** focuses on issues, such as environmental management, water and air quality, solid and hazardous waste, emergency planning and response practices, chemicals and toxicology, legislative and regulatory monitoring, and expert testimony and resources.

From its start in 1990, EPS has always made an effort to provide its members with opportunities for professional development and recognition through conference events, webinars, guidance documents, its triannual publication **EnviroMentor** and awards programs. In addition, EPS routinely surveys its members for their input on OSHA and EPA legislation and on hot topics, such as hydrogen as an alternative fuel source and green practices in the workplace. EPS also sponsors the **Agricultural Branch**.

To join this popular practice specialty, contact customer service at (847) 699-2929 or visit www.asse.org/JoinGroups. If you are an existing member of EPS and would like to join the Agricultural Branch for free, send an e-mail to customerservice@asse.org indicating your interest.

Follow EPS at www.asse.org/ps/environmental and on [LinkedIn](#). ☺



Virtual Webinars Right From Your Office Chair!

Virtual Learning

Higher Level Safety for Both Aging and Younger Workers: Mindsets and Skillsets For a Sustainable Workforce
Jan. 23, 2013 11:00 am (CDT)

Miner's Rights and Supervisor Responsibilities: Understand the "New Rules"
February 13, 2013 - 11:00 AM (CDT)

Actively Caring for People
March 6, 2013 - 11:00 AM (CDT)

Best Practices in Industrial Hygiene
March 20, 2013 11:00 am (CST)

On-Demand Offerings

Workplace Wellness
Brought to you by the Health & Wellness Branch

Rethink Safety

Changing Behaviors

ASSE Global Safety Conference

The CSP Experience

Convergence: The Role of Safety in Sustainability

Best Practices in Fire Safety Virtual Symposium

Brought to you by the Fire Protection Practice Specialty

"Watch Out!" for Your Organization: A Virtual Law Symposium for Safety Professionals



Working Incident-Free



Concentrating a PTP process on influencing jobsite behaviors is an excellent way to avoid unplanned events.

Consultants review many incident and accident investigation reports. Even though these reports come from many companies in a variety of industries, trends emerge, such as the commonly cited “failure of the pretask planning (PTP) process.” PTP [risk assessment, job safety analysis (JSA), job hazard analysis (JHA), etc.] plays a vital role in problem avoidance, but clearly there are challenges in making it effective. Recognizing this, some companies have used an open-source online PTP tool and library system.

CONSISTENCY

The incidents we see frequently involve tasks that have been carried out successfully many times before in an organization. Changing the circumstances in which a task is carried out can significantly alter the dangers presented to the work crew, with weather, location, adjacent activities and other variables coming into play. As Steve McCloud of URS Corp. points out, “At times, the duties of our personnel overlap, with individuals from two or more offices serving the same site. In other instances, one office may be solely responsible for a given worksite. Either way, the requirement for consistency is paramount. This can be difficult to achieve. The online tool is imperative to our attaining consistent hazard analysis, as well as documentation of the hazard analysis process.”

RELEVANCE

Robust PTP is all about problem avoidance and will generate preventive actions against dangers that may be encountered as the task is carried out. To increase the probability of success in PTP, separate the exposures into two categories: those generated by the task and those generated by the circumstances in which the task is to be conducted today.

For example, many of the dangers presented by the act of removing a valve for maintenance are the same, whether the task is conducted in the arctic tundra or deep within a tropical forest. However, clearly different dangers are generated by the context in which the work is to be done. To ensure that the dangers generated by the task itself are not neglected on the day, they can be addressed in a preprepared document developed with all relevant technical, operational and experiential input. This can be thought of as the “parent” PTP.

Steve Coffman, Halliburton’s West Coast health, safety and environmental manager, says, “The training our employees received in JSA writing skills helps tre-

mendously because it got them involved in writing their own JSAs, which gave them ownership in the process.”

McCloud adds, “The step-by-step online construction of the JHA ensures that no one is ‘underqualified’ to participate in the process, while the library provides access to existing JHAs by anyone within the company, regardless of location.”

FLEXIBILITY

With the parent PTP in place as a template, the risk assessment burden on the work team is reduced to considering only what contextual dangers might be present as they perform the task right here, right now. According to McCloud, “The flexibility of the online tool allows individuals to make minor modifications to the parent JHA to account for varying site- or day-specific hazards without permanently affecting the parent JHA.” Halliburton’s work crews use a hazard observation and communication process to ensure that current local exposures are addressed before work begins.

ACCOUNTABILITY

A common issue with the classic style of PTP is that it does not assign specific tasks to specific people, and as a result, unallocated precautions may not be implemented, leaving the work team exposed. However, this gap is relatively easy to fill simply by implementing a requirement to assign a named team member to each preventive action.

Coffman describes the result of this adjustment: “We embraced the idea of listing employees who are responsible for specific actions written into the JSA. We believe this gives employees ownership in making their specific work task safer and also makes them accountable for their actions or nonactions.”

NO SILVER BULLET

McCloud concludes, “The online system provides us with an extremely effective tool for providing not only a safe work environment for our personnel, but consistent reporting to our client.”

Concentrating a PTP process on influencing jobsite behaviors is an excellent way to avoid unplanned events. Coffman makes a final comment: “There is no ‘silver bullet’ in the safety profession, but I can say without a doubt the JSAs have gotten our employees more involved in the implementation of their JSAs and is helping us achieve our ultimate goal of zero injuries.” ☉

Norman Ritchie is a director at vPSI Group LLC.

Construction Risk & Insurance Specialist Certification: Members Weigh In on Its Value

“From an insurance application, this certificate gives the specialist an emphasis in applying risk management and insurance application influences in the construction industry spectrum, specifically. Unless you are diving into this as an insurance risk manager or are a construction safety specialist who deals with the insurance application in the contractor’s business, you will not get much more out of this training other than awareness. If you are a CSP working with contractors or a consultant in the construction industry, then the CRIS can be a benefit to have in your repertoire of skillsets.”

“I am a Construction Health and Safety Technician (CHST) who holds the CRIS certification. The CRIS is geared more for risk managers, but I hear that more and more clients are requesting the CRIS as a secondary certification to ensure a better understanding of risk management practices, workers’ compensation, pollution liability, etc. Note the CRIS and Associate in Risk Management are different.”

“I am a CHST with the CRIS certification. CRIS has been beneficial when consulting with con-

tractors and getting across the cost benefits of a sound safety program.”

“The CRIS has provided me with a solid understanding of the various insurance requirements and issues that face someone working in the construction industry. I was required to get it at my last job. My current job also required it, so it was a great benefit to me when I interviewed and already had the designation. If you will be dealing with your company’s insurance plans, then I would recommend getting it. If you do not plan on working for an insurance company or do not deal with insurance at all, then you probably do not need to obtain it.”

“Most certifications hold at least some value. It can never hurt to open up a book or take a class and learn something new, regardless of whether or not you get a designation from it. The CRIS can certainly be viewed as optional, but if you have the time, it is easy to obtain, can be done at home and does not take much time. In this economy, companies are looking for people with a wide range of abilities, so even if you do not need the CRIS

now, it would not hurt you to get it.”

“I just interviewed a CSP yesterday for an open position at my firm whom I would not let anywhere near my policyholders. Regardless of the ‘alphabet soup’ after one’s name, people need to have relationship skills and be able to communicate to diverse audiences. This seems to be lacking all too often these days.”

“I have the CRIS and found it to be useful. If you have risk management/insurance responsibilities at your construction firm or have construction clients, I would recommend it.”

“I hold the CHST and have started the coursework for the CRIS since I have seen several large-scale power and rail system specs calling for it. I work with many owner-controlled insurance programs and contractor-controlled insurance programs, so I thought the CRIS would be useful since the pricing structure of the CRIS is much easier to take, and it is a fairly easy way to get my CEU requirements.” ☺

Practice Specialties Scholarship

The practice specialties sponsor a Professional Development Conference (PDC) Scholarship. This scholarship provides a full PDC experience, including airfare, hotel, meals and registration. Currently, two \$1,200 awards are given each year.

Please consider making a personal tax-deductible donation to the scholarship fund. If your company has a matching donation program, you could double your contribution. To contribute, click “donate now” below and note “PDC Scholarship” in the “Other” field.

Checks can also be made payable to the ASSE Foundation marked “PDC Scholarship” in the memo section and mailed to:

ASSE Foundation, Attn: Mary Goranson
1800 E. Oakton St.
Des Plaines, IL 60018

[Donate Now](#)

Professional Indemnity Insurance: An International Perspective

In general, professional indemnity (PI) insurance covers insured safety officers and occupational safety and health consultants in their individual capacity.

How Much Does It Cost?

Lockton Cos. (Singapore) Pte. Ltd (Lockton) has provided a sample premium structure for international professionals.

- 1) \$163,828 with a premium of \$327.66+GST
- 2) \$409,571 with a premium of \$737.23+GST

Where Does It Apply?

The territory and jurisdiction would be Singapore in this case, which means the act/alleged act takes place in Singapore and any claim/proceeding against the insured



will need to be brought to the courts of Singapore for the policy to respond.

WHAT DOES A PI INSURANCE POLICY TYPICALLY COVER?

- 1) If an insured safety officer commits a negligent error or omission or s/he is accused by one party that s/he has committed a negligent error or omission; and
- 2) If a legal proceeding is pursued against the officer or a legal action is threatened against him/her by that party to recover their losses; and
- 3) S/he notifies the PI insurer within the current policy period; then
- 4) The PI insurer will pay for the legal defense costs and damages awarded against the officer up to the limit purchased under the PI policy.

WHAT SHOULD YOU KNOW ABOUT PI INSURANCE POLICIES?

- 1) PI policies typically only pay for legal liability arising from your negligent act, negligent error or negligent omission or breach of statutory duty committed or omitted or alleged to have been committed or omitted.

They typically do not cover the errors of other parties.

2) PI policies typically only pay for your errors occurring after the retroactive date. The retroactive date is usually found in your policy schedule, i.e., the page that has your firm's name, period of insurance, limit of indemnity, etc. If this is the first time you are taking PI insurance, the retroactive date will be date of the policy's inception.

3) PI policies typically only pay if you notify the insurer within the period of insurance stated in the policy schedule. If you have a claim or an alleged claim of error or omission and you only notify the insurer after the policy expires, the policy will not pay.

4) If you are aware of any circumstance that may eventually lead to a claim made against you, you should notify this to your insurers/brokers immediately within the policy period. This is especially important across a policy expiry date. Your insurance coverage will likely be severely compromised if you fail to report a known circumstance promptly.

Contact **Chin Ah Faat, Tracy Ho** or **C. Nandakumar** for more information. ☎

Reprinted with permission. Originally published in Singapore Institution of Safety Officers' SAFETY MATTERS (Issue 2/2010).



Research Fellowship

The ASSE Foundation has announced the 2013 Liberty Mutual Safety Research Fellowship Program, which is available to individuals with a doctoral degree or working toward a master's or doctorate. Fellows will spend 4 to 6 weeks during summer 2013 at the Liberty Mutual Research Institute for Safety in Hopkinton, MA, with access to current research projects, systems, equipment, researchers and other resources. Fellows will receive a weekly stipend. Learn more and review the application [here](#). Applications are due Feb. 1, 2013.

OSHA at 40: The Future of OSHA Is You

Following is the transcript of a speech delivered by Captain Brian Osgood, head of the Pearl Harbor Shipyard Voluntary Protection Program, at OSHA's 40th anniversary celebration.

Most of you here were not born 40 years ago, when President Nixon signed the Occupational Safety and Health Act. But each of you, and your families, have benefitted from the safe working environment OSHA has brought to our nation.

The OSH standards implemented in general industry, the construction industry and shipbuilding and ship repair have saved tens of thousands of lives since 1970. In the past 20 years alone, the annual on-the-job fatality rate in the U.S. has dropped by a third—from nearly 6,600 a year to about 4,500.

Pearl Harbor Naval Shipyard is proud to partner with OSHA. As a result of our close working relationship with OSHA, we have developed an aggressive and effective safety culture. Here is the proof: as recently as 15 years ago, the shipyard had 16 injuries per 100 shipyard workers every year. Our focus on safety is so effective that now we are down to two injuries per year. That is only a quarter of the annual shipbuilding industry average, which is 8 injuries per 100 a year. And in the past 20 years, while there have been more than 200 on-the-job deaths in Hawaii, our shipyard has had only one shipyard employee fatality.

So Pearl Harbor Naval Shipyard is on the right path—the path to zero on-the-job mishaps. As the largest industrial employer in the State of Hawaii, with nearly 5,000 employees, we are setting the standard for the State of Hawaii and our industry.

My shipyard is part of OSHA's Voluntary Protection Program or VPP. VPP's goal is to bring management and labor together to build a safe, healthier work environment. With OSHA's help, Pearl Harbor Naval Shipyard has achieved VPP Star site status: we are a nation in safety and health. We know that commitment to safety is good business and good for our nation's security.

We are the largest industrial employer in the State of Hawaii. Our mission is to perform repair and maintenance of surface ships and nuclear submarines to keep the U.S. Navy Pacific Fleet "fit to fight." Those ships protect you and your family

from enemy ballistic missile attacks on Hawaii, and the ships and submarines protect America and our friends and allies around the world.

We are able to complete our mission involving many high-risk evolutions with the lowest accident rate of all Navy shipyards. Our rate is less than half of the average for similar work performed by private companies throughout the country.

At the same time, we have reduced accident rates, and we have increased our productive capacity by 15% in the last 2 years. Fewer accidents save time and money. And increased productive capacity means we can take on more work, keeping our workforce securely employed and ensuring that our country's fleet is able to perform its mission to protect our nation.

The shipyard adopts best practices from private industry. For example, we have emulated Dupont Corp., the world's largest chemical company, with nearly \$33 billion in total revenue for 2010 and \$40 billion in other assets.

Dupont Corp. developed a safety program called the Route to Zero. Dupont compares accident rates to the phases of development of an organization's safety culture.

Simply put, as an organization's safety culture improves, the number of accidents decreases. Here are the phases of a normal organization's development of a safety culture:

The first phase is called Natural Instincts. In the Natural Instincts phase, the organization is reactive, with a focus on compliance. Most people will do what they are told to do regarding safety. But the safety program's success rests with the safety manager, with little involvement by other management. This phase represents a weak safety culture.

In the second phase, the focus is on supervision. More managers and supervisors are involved in the safety culture. This is the Dependent phase, where the workforce depends on management to take care of them. While management commitment is improved in this phase, you also typically see an increase in rules and requirements and fear of discipline as workers are told safety is a condition of employment. On the positive side, there is more emphasis on training, as management better recognizes the value of their most important resource, their people.

“Each of you has personal responsibility for your own safety and for the safety of those around you. This is more than a job requirement; it is a culture, a way of life that goes beyond your workday. A safety culture must be reflected in your life at home, at play and at work.”

In the third phase, known as Self, employees are more engaged and have shifted from depending on management to take care of them to becoming independent. As the workforce internalizes their personal commitment to safety, they establish personal standards. They are smarter and can better recognize and control hazardous conditions around them. Independent employees look out for themselves, ensuring that they are safe on the job.

The final phase in the Route to Zero is known as the Teams stage—that is when the workforce becomes each other’s keeper. We reach out to help others conform to our high standards and expectations for safety on the jobsite. As we care for others, organizational pride grows. At this phase, we are an interdependent network. At this state, a goal of zero accidents truly becomes achievable.

Pearl Harbor Naval Shipyard has also embraced the five disciplines of a learning organization. The steps we took to become a learning organization helped us become the best depot-level maintenance organization in the Department of the Defense—the best of all Army, Navy, Air Force and Marine organizations.

As a learning organization, we use five disciplines. The five disciplines we use are mental models, shared vision, team learning, personal mastery and systems thinking.

Our approach to improving our safety culture and raising our standards to achieve excellence in safety coincide well with the learning organization disciplines.

Regarding safety, our mental model is that the safety office is not solely responsible for safety. Everyone has an important role and must take personal responsibility. We have reinvented relationships to help change negative mental models and to improve teamwork.

Our shared vision is that we can complete a repair project on time, within cost, with first-time quality without injuries.

Our team learning approach is that a group of people, working together, can improve work processes to complete a task faster, better and safer. Each person on the team is an important contributor.

And for personal mastery, we teach each of our workers that you have the energy and drive to increase your own capabilities and to improve the capabilities of the other people around you. That is personal mastery. The central tenet of this discipline is that no one can increase someone else’s personal mastery. We can only set up conditions that encourage and support people who want to increase their own.

Finally, regarding systems thinking, author Peter Senge tells us that farm children learn naturally about the cycles of cause and effect that make up systems. They see the links among the milk the cow gives, the grass the cow eats and the droppings that fertilize the fields. When a thunderstorm is on the horizon, even a small child knows to turn off the floodgate on a spring-water well for fear that runoff carried downstream by the rains will foul it. Similar thinking applies to performing work safely at our shipyard.

One of the four elements of VPP is management leadership and employee involvement. We have an excellent management system for comprehensive planning that includes protection of worker safety and health. We do not hesitate to stop if a problem arises that could jeopardize worker safety. We do not accept workers taking unnecessary risk.

Equally important, our employees must be meaningfully involved in the safety and health program. That goes beyond just wearing PPE.

Each of you has personal responsibility for your own safety and for the safety of those around you. This is more than a job requirement; it is a culture, a way of life that goes beyond your workday. A safety culture must be reflected in your life at home, at play and at work.

The future of safety rests with you. As apprentices in the workforce, we rely on you to do the right thing, do your best and do it safely.

As new professionals entering the public or private workforce, recognize that you can make a difference. Take pride in the quality of your work and your focus on safety. ☺

ANSI/AIHA/ASSE Z10-2012 Now Available

The newly revised American National Standard for Occupational Health and Safety Management Systems (ANSI/AIHA/ASSE Z10-2012) was approved by ANSI on June 27, 2012. American Industrial Hygiene Association (AIHA), past secretariat of the Z10 Accredited Standards Committee (ASC Z10), has relinquished all of its secretariats to ASSE, making ASSE Z10 ASC secretariat and copyright holder of the 2012 and 2005 versions of the Z10 standard.

The Z10 standard provides an overall blueprint for widespread benefits in health and safety, as well as in productivity, financial, performance, quality and other organizational and business objectives. The standard's seven sections include Management Leadership and Employee Participation, Planning, Implementation and Operation, Evaluation and Corrective Action, Management Review. Appendices address roles and responsibilities, policy statements, assessment and prioritization, audit information and much more.

The Z10 standard also provides critical management systems requirements and guidelines for improvement of occupational health and safety. Experts from labor, government, professional organizations and industry formulated this valuable standard after extensive examination of current national and international standards, guidelines and practices.

Z10-2012 SCOPE & APPLICATION

The Z10 standard defines minimum requirements for an occupational safety and health management system. It applies to organizations of all sizes and types.

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 - Appendix M — Management Review Process
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- Comparison
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There is widespread agreement that the use of management systems can improve organizational performance, including performance in the occupational health and safety arena.

Z10-2012 FOREWORD

Quality, environmental and occupational health and safety (OHS) management systems are used by many organizations in the U.S. and around the world. Quality and environmental systems are frequently in conformance to international voluntary consensus standards, or they share many basic concepts and principles with them. The development of international OHS standards and guidelines is a more recent phenomenon. Many organizations operate their own occupational health and safety management systems (OHSMS), while others use systems that conform to available guidelines. Until the development of this voluntary consensus standard, there was no U.S. OHSMS consensus standard.

There is widespread agreement that the use of management systems can improve organizational performance, including performance in the occupational health and safety arena. The Occupational Safety and Health Administration's Voluntary Protection Program relies on management system principles and has reported success in improving occupational health and safety performance among participating companies. In addition, the American Chemistry Council reports success in improving environmental performance of participating organizations. The major professional health and safety organizations are also on record in support of management systems as effective tools for improving

health and safety performance, as well as for contributing to the overall success of the business. Finally, the fact that many organizations in the U.S. and abroad are implementing management systems in occupational health and safety is evidence that these systems add value to their businesses.

In 1999, ANSI officially approved the ANSI Accredited Standards Committee Z10, with the American Industrial Hygiene Association as its Secretariat, to begin work on a U.S. standard. A committee was formed with broadly representative members from industry, labor, government, professional organizations and general interest participants. The committee examined current national and international standards, guidelines and practices in the occupational, environmental and quality systems arenas. Based on extensive deliberations, they adapted the principles most relevant from these approaches into a standard that is compatible with the principal international standards as well as with management system approaches currently in use in the U.S. The process of developing and issuing a national consensus standard is expected to encourage the use of management system principles and guidelines for occupational health and safety among American organizations. It may also yield widespread benefits in health and safety, as well as in productivity, financial performance, quality and other business goals.

Figure 1 OHSMS Cycle

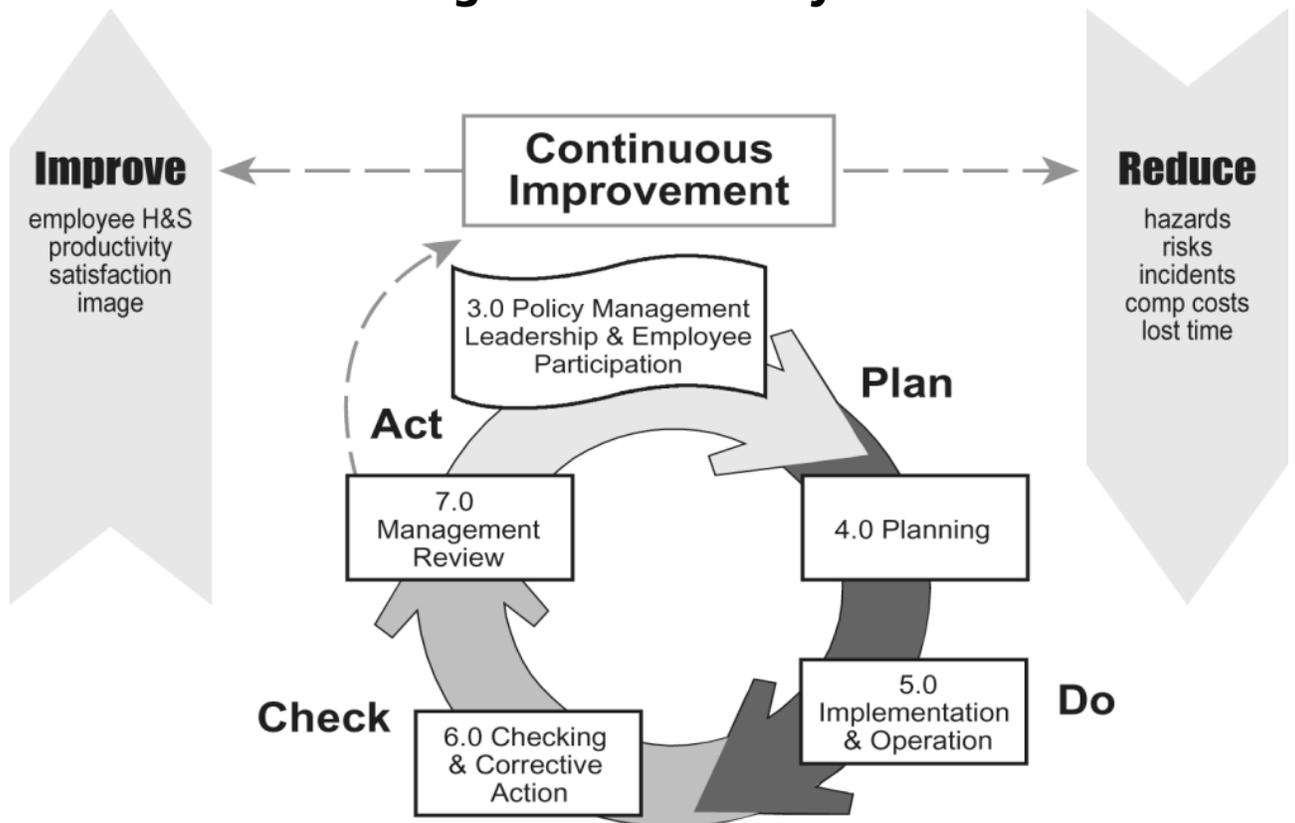


Table 1 Key Z10 Provisions & Changes for 2012

Key provisions	Key 2012 requirement changes	Enhanced guidance
SECTION: MANAGEMENT LEADERSHIP AND EMPLOYEE PARTICIPATION		
Responsibilities of top management OHS policy Employee responsibility and participation	Policy availability (external) Alignment with performance, financial and recognition systems	Leadership communication Integration with business systems Reliance on system performance Employee participation (enhanced appendix)
SECTION: PLANNING		
Initial and ongoing reviews Assessment and prioritization of OHSMS issues Development of objectives and implementation plans	Clarification of initial and ongoing reviews Risk assessment and mechanisms for employee involvement Periodic review and update	System versus operational planning Conducting an initial review Risk assessment methodologies (new appendix) Use of quantitative and qualitative objectives
SECTION: IMPLEMENTATION AND OPERATION		
Implementation of operational elements Use of the hierarchy of controls Inclusion of processes for: <ul style="list-style-type: none"> • design review • management of change • procurement of supplies and services • contractors • emergency response Provision for education, training, awareness and competence Communication about the OHSMS Documentation and control of records	Risk assessment process Consultation with contractors Timely training and competent trainers Employee participation	Inclusion of hazard topics within operational elements Risk assessment (new appendix) Employee participation in management of change Design review and management of change Contractors and procurement checklists (new appendix) Competence assessment
SECTION: EVALUATION AND CORRECTIVE ACTION		
Process to <ul style="list-style-type: none"> • monitor, evaluate and communicate hazards, risks and controls • investigate and analyze work-related incidents • conduct, document and communicate OHSMS audits • provide prompt corrective action for serious injury and illness conditions • corrective/preventive actions and closure 	Assessment of legal and other requirements Audits by competent persons with independence	Using incident investigations to understand root-cause failures Explanation of audit and independence (enhanced appendix) Assessing residual risks in corrective/preventive actions
SECTION: MANAGEMENT REVIEW		
Annual management review for suitability, adequacy, and OHSMS effectiveness Determination of future OHSMS direction	None	None

Z10 HISTORICAL MATERIALS

- [Article on Z10 Standard \(Spanish\)](#)
- [ANSI/AIHA Z10-2005: The New Benchmark for Safety Management Systems](#)
- [Legal Perspective: ANSI/AIHA Z10-2005 Standard, Occupational Health & Safety Management Systems](#)
- [Special Issue of The Compass](#)
- [The Paradigm Shift in Standards Thinking: Management Systems vs. Specification](#)
- [Z10 PowerPoint Presentation](#)

GOVERNMENT RECOGNITION

- [Federal Register Vol. 75, No. 174](#)
- [UT Workers' Compensation Fund: Best Practices in Safety](#)

LINKS

- [ANSI Essential Requirements](#)
- [ASSE Info on Standards Development Process](#)
- [Official Memorandum of Understanding Between OSHA & ANSI](#)
- [Office of Management & Budget Circular OMB-A119](#)
- [Position Statement on Consensus Standards](#)
- [Safeguarding: Are ANSI Standards Really Voluntary?](#)
- [What's the Difference Between an OSHA Rule and an ANSI Standard?](#)
- [ANAB Accreditation for Occupational Health and Safety Management Systems](#) ☺

Incident Management: Recordables*continued from page 1*

by training management and supervisors on proper recordkeeping protocol. The key is to identify whether an injury is recordable, how to properly record workplace injuries and why this is important.

WHAT IS A RECORDABLE INJURY?

An OSHA recordable is an occupational injury or illness that requires more extensive medical treatment than simple first aid. In 2010 alone, nearly 3.1 million nonfatal workplace injuries and illnesses, or 3.5 cases per 100 workers, were reported for the private sector. Although this figure demonstrates a decline from 2009, nonfatal incidents for the public sector remained nearly unchanged at 5.7 cases for every 100 workers.

Even injuries that do not seem work-related still could be recordable. Loss of consciousness, death and significant injury or illness, such as cancer, asbestosis, chipped teeth, fractures or punctured eardrums, may be considered recordable injuries. These conditions may affect routine job functions and may result in days away from work, restricted work or job transfers.

In comparison, simple first aid includes but is not limited to cleaning, flushing, soaking and covering wounds, the need for over-the-counter medications, foreign body removal, tetanus shots and diagnostic procedures, such as X-rays or blood tests. Additionally, employers are not required to record instances of common flu or cold, mental illness, motor vehicle accidents during an employee's commute, self-inflicted injuries and choking.

Other exceptions exist and thus, understanding the limits of recordable injuries and illnesses is important for both employers and employees. To simplify the process, employers should remember that an injury is recordable when any of the following occur:

- an employee is prescribed medication;
- days away from work or restricted work;
- loss of consciousness.

TO WHOM DOES RECORDKEEPING APPLY & HOW IS IT PERFORMED?

Keeping records of occupational deaths, injuries and illnesses is an important requirement for many businesses. Companies with 10 or fewer workers and those in certain industries, such as finance, real estate and insurance, are not required to report this information unless fatalities or major accidents occur.

OSHA states that employers must inform employees on how and what to record and must set up a way to report work-related injuries and illnesses in a prompt manner. Staff must be given access to recordkeeping documents, including forms 300, 300A and 301. Maintaining these three forms over time and ensuring that the information contained in them is accurate is a key way to remain compliant. This means new cases

must be added and previously recorded injuries and illnesses must be updated as they occur.

Form 300 classifies accidents and illnesses and the extent and severity of each in a concise log. Form 300A is a numerical summary of incidents for a particular location in a facility and must be clearly posted for employees and new applicants to view from Feb. 1 to April 30 (of any given year). These two forms must be kept for 5 years after the incident. Form 301 is an injury and illness report that describes the incident and physician contact information.

COSTLY CONSEQUENCES

OSHA inspections and employee lawsuits can hurt both a company's image and its profitability. In 2010, OSHA added 160 new positions to conduct health and safety inspections, both scheduled and unscheduled. Top reasons for unannounced OSHA inspections include imminent danger in the workplace, the occurrence of a fatality or catastrophe and complaints by employees. Programmed inspections are also performed for industries and employers with high injury and illness rates. Inspections can occur at any time, and companies can be fined for not having injury records that date back 5 years. Thus, it is crucial to have injuries and illnesses properly recorded to avoid fines.

Several of the **highest OSHA penalties** in history have included violations for recordkeeping after accidents prompted OSHA to intervene. However, safety concerns are not the only motivation for an OSHA visit. Complaints from disgruntled employees also have the power to warrant an inspection.

In 2004, a West Virginia plant was fined \$77,000 for failing to record 38 injuries and illnesses after OSHA received a complaint. In 2009, an employee from Whole Foods was fired for alerting the company of sewage leaking into the cheese department. The employee was fired for implying that management was not properly handling the safety issue, thereby prompting OSHA to sue Whole Foods on behalf of the worker. To avoid recordkeeping fines and possible lawsuits and to uphold a culture of safety, employers need to take incident management and employee concerns seriously.

PROMOTING A CULTURE OF SAFETY

OSHA officials fear that employers underreport injuries, often to hide the presence of unsafe conditions or because employers lack trained safety personnel. However, the benefits of recordkeeping outweigh the harsh penalties that come with noncompliance, which is why it is important to promote a culture of safety within your organization. Following OSHA's guidelines for recordkeeping is a sure way to avoid costly violations and to improve your business' bottom line. However, you can also follow these steps to further instill a culture of safety in your business:

1) Conduct a safety audit. Team up with other safety professionals and third-party experts to conduct



an independent audit of your business. Speak with employees to solicit their feedback on potential risk areas within the operation. Work with them to rectify these issues.

2) Provide blended training options. Stop accidents before they happen. Training presented in a variety of mediums, including instructor-led, online and DVD programs, help improve retention and ensure that workers thoroughly understand the information presented.

3) Make safety meetings fun. Rather than conduct routine meetings with little value to employees, vary formats, locations and speakers to keep meetings interesting. Include employees who work in the field or on the floor for a variety of personnel.

4) Engage employees. Survey employees to identify potential safety topics that they would like to have presented or learn more about.

5) Provide routine health testing programs. Employees with extended exposure to potential hazards may experience long-term impact, even though there are no visible indicators now. For example, workers with exposure to loud equipment or machinery should receive ongoing hearing testing to ensure that there is no degradation to their hearing. Onsite testing solutions reduce the downtime required compared to traditional testing methods.

Recordkeeping allows your business to identify recurring or dangerous safety issues; however, business leaders can reduce potential accidents before they occur by promoting a culture of safety within their organization. Simple programs can help protect workers and show them that you care about their well-being, which in turn improves productivity and your bottom line. ☉

Mark Olson is manager of safety training and compliance products at Cintas Corp.

Is It a Recordable Injury? ***Take the Quiz!***

Q: An employee cuts her hand, cleans the wound and covers it with a liquid bandage.

A: If surgical glue or liquid bandages are used simply to cover an injury, this is considered first aid and is not recordable whereas closing a wound that has separated the skin is considered medical treatment and should be recorded.

Q: An employee falls off a ladder, loses consciousness and is put in a neck brace and on a spine board when medical personnel arrive.

A: Disorientation alone is not recordable, and the use of these medical devices is usually standard protocol. However, because the employee lost consciousness, this is recordable.

Q: An employee burns himself while pouring a cup of coffee at work that meets the criteria for a medical treatment case.

A: This incident is not recordable because injuries incurred while eating or drinking for personal consumption are not work-related (even though it happened at work).

Q: An employee develops a work-related skin rash but continues working because the irritation does not result in treatment beyond first aid.

A: This is not recordable because although it is work-related, it does not result in days away from work, restricted work, job transfer or extensive medical treatment.

Q: An employee's finger and nail are cut while operating a machine and prescription antibiotic ointment is used to treat the laceration.

A: This is a recordable injury because the ointment is prescription. It would be considered simple first aid if it was an over-the-counter medication.



Welcome New Members!

Thanks to everyone who has remained a loyal member of the Risk Management/Insurance Practice Specialty (RMIPS) and welcome to the following members who recently joined. We currently have more than 2,200 members. If you have any colleagues who might be interested in joining RMIPS, please contact **Krista Sonneson** to request an information packet or visit www.asse.org/JoinGroups for more information. If you know anyone who might be interested in joining ASSE, please contact **customer service**.

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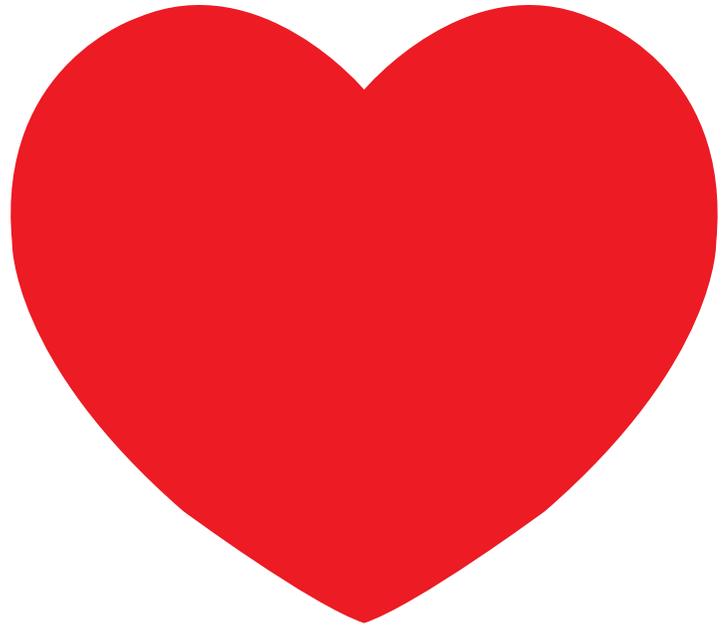
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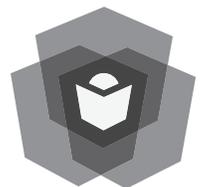
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