Building a Safety Program for Your Organization
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Congratulations!

You have just received the responsibility for your organization’s safety program — but you do not know where to turn! This book is designed to help identify the strengths and weaknesses of your organization’s existing program. If you do not have a safety program, this book will help you establish a basic program.

But you cannot do this alone. You will need visible commitment from top management, middle management, and frontline management within your organization in the form of time, ownership of the organization’s safety program, and financial support.

Safety is not a stand-alone program. Safety accountability and responsibility are a part of every employee’s job and every department within the organization, for example:

♣ **Purchasing**
  Responsible for developing and implementing control measures to ensure all parts, equipment, and new material are analyzed for potential hazards, and that they comply with all applicable local, state, and federal safety and health standards

♣ **Vendors, customers, contractors and subcontractors**
  Responsible for complying with all applicable, local, state, and federal safety and health standards
## Contents

The Basics — What You Need to Know About MIOSHA .............................. 1  
- Summary  
- MIOSHA Inspection  
- Poster Requirements  
- Minimum MIOSHA Regulation Requirements

How Does Your Safety and Health Program Rate?................................................. 9  
- Safety and Health Program Self-Assessment Score Sheet

Keys to a Successful Safety and Health Program................................................. 17

Developing a Safety Program — Begin With the Basics .............................. 19

Creating a Safety and Health Policy ................................................................. 21  
- Sample Safety and Health Policy

Job Safety Analysis Procedure ........................................................................... 23  
- Job Safety Analysis Worksheet

Hazard Recognition .......................................................................................... 27

Accident (Incident) Investigation ...................................................................... 29  
- Sample Employee Accident Investigation Report

Summary of the Occupational Injuries and Illnesses Log ............................... 33  
- Sample MIOSHA 200 Log

Workers Compensation..................................................................................... 37

Costs Associated With On-the-Job Injuries..................................................... 41

Return-to-Work — Modified Duty ..................................................................... 43  
- Medical Provider’s Key Services  
- Job Description  
- Job Analysis

Influencing Individual Behavior Changes ......................................................... 49

Appendices....................................................................................................... 51  
- Sample Framework for a Recordkeeping Management Program  
- Sample Framework for a Drug and Alcohol Policy  
- Developing a Safety Program Checklist
The Basics — What You Need to Know About MIOSHA

Summary

The Bureau of Safety and Regulation administers the Michigan Occupational Safety and Health Act (MIOSHA). MIOSHA is broken down into 10 different divisions; the focus of each division is described below.

Safety Standards
- This division coordinates the promulgation process for occupational safety standards
- Supports the advisory committees appointed by the commissions to make recommendations with respect to promulgation of standards
- Responsible for implementing the Freedom of Information and Open Meetings Acts

General Industry Safety Regulations
- Standards are promulgated by the General Industry Safety Standards Commission
- Regulates working conditions for every type of work setting for public and private employees, except mining, domestic settings, and construction operations

Construction Safety Regulations
- Standards are promulgated by the Construction Safety Standards Commission
- Regulates working conditions/activity of Standard Industrial Classification (SIC) Codes 15, 16, and 17

Occupational Health Regulations
- Standards are promulgated by the Occupational Health Standard Commission
- Regulates working conditions for public and private employees
- Provides occupational health education, training, and consultation services

Consultation, Education and Training (CET)
- This division provides community-based occupational safety consultants who work with employers/employees
- Provides safety training and consultation throughout the state
- Provides safety materials

Safety Education and Training Grant Program
- State-funded program administered by the Bureau of Safety and Regulation
- Grants are awarded to management/employer groups, labor/employee organizations, and nonprofit organizations based on open competition
- Purpose of this program is to promote MIOSHA safety and health training to specific target groups
MIOSHA Information
• Statistical program for occupational safety and health data
• Recording and reporting of occupational injuries and illnesses

MIOSHA Appeals
• Represents the Bureau in formal appeals of citations generated by MIOSHA inspectors from both the General Industry and Construction Safety Divisions
• This division provides a due process forum for both employers and employees

Employee Discrimination
• Administers and enforces the MIOSHA provisions concerning employee complaints of alleged discrimination in violation of Section 65 of MIOSHA
• Coverage includes, but is not limited to, discrimination in cases involving discharge, filing a safety or health complaint, testifying or intending to testify in any proceeding, loss of wages or fringe benefits because of refusal to work on unsafe equipment or in unsafe conditions, loss of wages or fringe benefits for participation in MIOSHA investigations as the walk-around representative

Wage and Hour
• Ensures compliance with state wage and hour laws
• Enforces standards and hours for legal employment of employees under 18 years of age

MIOSHA Phone Numbers
• Occupational Health Division Central Office (Lansing) (517) 322-1608
  © Asbestos Program (517) 322-1320
  © Chemical Compliance (517) 322-1608
  © Safety Education and Training (517) 322-6933
• Consultation, Education and Training (Safety Division) (517) 322-1809
• Safety Standards Division (517) 322-1845
• Fatality Hotline (800) 886-4674
• Web Site www.cis.state.mi.us/bsr/

MIOSHA Inspection

A MIOSHA officer will be assigned to investigate complaints stemming from:
• Employee Complaint Investigations — The employer will receive a copy of the complaint in writing. The name of the complainant does not need to be revealed.
• Accident Investigations — A small percentage of reported injuries obtained through the media or referral from another agency or source are investigated.
• Referrals — Obtained from another agency.
• Routine Safety Inspections — All types of employment throughout the state, based on a two-step process:
  © Identification of high hazard industries
  © Identification of high hazard facilities within those industries
The Steps of a MIOSHA Inspection

Opening Conference
- MIOSHA officer shows appropriate identification
- Meets with the chief executive of the workplace, designated employee representative if applicable, or a number of employees, based on the total in the workplace

Records Review
- MIOSHA recordkeeping documents—injury/illness log
- Written programs or procedures (e.g., hazard communication, lockout/tagout, fall protection)

Walk-around
- MIOSHA officer explains the walk-around requirements
- Documents alleged violations
- Accompanied by an employer and employee representative

Closing Conference
- Findings are discussed at the completion of the inspection
- The amount of time necessary to correct any hazard is determined
- Right to appeal is reviewed
- Penalty adjustment factors including “good faith” credit, size of business, and MIOSHA history
- MIOSHA officer’s report is sent to Lansing for review, calculation of any penalties, and citation issuance

MIOSHA Violations and Fines
- **Willful** — there was knowledge of a hazardous condition that could kill or cause serious injury, and it was not corrected
  © Maximum fine: $70,000/violation
- **Repeat** — is issued if the organization was inspected and a violation was issued but not corrected prior to re-inspection
  © Maximum fine: $70,000/violation
- **Serious** — obvious hazards that have the potential to cause a serious injury or death; these are things that the organization should have known about
  © Maximum fine: $7,000/violation
- **Other than serious** — an infractions of a standard that would not cause death or serious injury
  © Maximum fine: $7,000/violation
- **Failure to abate** — cited violation was not corrected by the organization
  © Maximum fine: $7,000 per day when the violation has not been abated by the due date
- **DeMinimus** — Minor infractions of a standard; no fines are issued, but infractions are included in the report
Citation Notice
- Sent certified mail to the employer
- Post copy of the citation at or near the place where the violation occurred

Appeal Process
- A two-step process the employer may use to appeal all, or part of, any citation
- First Appeal — must be filed with the MIOSHA Division issuing the citation within 15 working days of the receipt of the citation; a division review follows and a decision is issued
- Second Appeal — must be filed within 15 working days of the employer’s receipt of the results of the first appeal process; the Board of Health, Safety Compliance and Appeals sends a prehearing notice indicating date, time, and location of an informal hearing
- If the issue is not resolved, the Administrative Law Judge will issue a formal hearing
- The Administrative Law Judge’s decision may be appealed to the full seven-member board and ultimately to a Michigan circuit court

Extension
- An employer who accepts a citation, but cannot make the correction within the allotted time, may petition for an extension of time; a “good faith” effort must be made to try to meet the original deadline

**Poster Requirements**

If you are not sure if your company or organization falls under the jurisdiction of the agencies listed below, please contact them directly.

**State and Federal Taxes**
- Register with the Internal Revenue Service for federal income tax withholding and Social Security taxes (800-829-1040)
- Register with the Michigan Department of Treasury, Treasury Building, Lansing, Michigan (517-373-0888) for employee state income tax withholding
- Register with the City Treasurer’s Office for local income tax withholding

**State Unemployment Insurance**
- Register with the Michigan Unemployment Agency (UA) for unemployment taxes (800-638-3994)
- Unemployment taxes are paid by the employer — none should be withheld from an employee’s wages

**Federal Unemployment Insurance**
- Employer must pay federal unemployment taxes
- Contact the Internal Revenue Service (800-829-1040)
Workers Compensation
• Employers are required to provide workers compensation, which may be purchased from a private insurance company

Safety and Health Information
• Employers must comply with safety and health standards under the federal and state Occupational Safety and Health Act (OSHA) and Right-to-Know laws (517-322-1809)

Immigration Law Compliance
• Employers must verify employment eligibility of all employees hired after November 6, 1986; for information and forms contact the Immigration and Naturalization Service (313-226-3270)

Source: The MIOSHA information was obtained from the MIOSHA Overview and Wage and Hour Information CET on Safety (SP-20).

**Minimum MIOSHA Regulation Requirements**

The Michigan Occupational Safety and Health Act applies to all places of employment in the state, except in domestic employment and in mines, as defined in Section 4 of Act 154 of 1974. An employer is defined under this act as an individual or organization (including the state or political subdivision) that employs one or more persons.

**General Industry** employers (non-construction) in the state of Michigan must comply with the following broad (horizontal) regulations, in addition to any industry-specific (vertical) regulations.

Michigan Occupational Safety and Health Act 154 of 1974 Administrative Rules
• Procedures, Part 4
• Recordkeeping and Reporting of Occupational Injuries and Illnesses
• Variances
• Inspections and Investigations, Citations and Proposed Penalties

Employee Medical/Exposure Records
General Provisions
• Employee and Employer Responsibility
• Personal Protective Equipment
• Housekeeping
• Working in Confined or Hazardous Spaces
• Lubrication
• Color Coding
• Aisles and Floors
• Dockboards
• Derailers, Bumper Blocks, and Clearance Signs
• Machine Installations
Machine Controls
Machine Guards and Devices
Air Under Pressure
Cleaning of Containers
Rescission of Federal OSHA and State Standards
Floor and Wall Openings, Skylights
Fixed Ladders
Portable Ladders
Fire Exits
Guards for Power Transmissions
Portable Fire Extinguishers
Personal Protective Equipment
Accident Prevention Signs and Tags
Hand and Portable Powered Tools
Electrical Safety-Related Work Practices
Lockout/Tagout
Illumination
Sanitation
Medical and First Aid
Hazard Communication
Signs

MIOSHA Construction Safety Standards regulate working conditions for public and private employees. Construction, as defined by MIOSHA, involves working conditions and activities classified under SIC codes 15, 16, and 17. The following is a list of the basic broad (horizontal) regulations. Industry-specific (vertical) regulations are not included in this list.

Michigan Occupational Safety and Health Act 154 of 1974, Administrative Rules
- Procedures, Part 4
- Recordkeeping and Reporting of Occupational Injuries and Illnesses
- Variances
- Inspections and Investigations, Citations and Proposed Penalties
General Rules
- Employer Responsibilities; Accident Prevention Program
- Employer Responsibilities
- Employee Responsibilities
- Leased and Rental Equipment
- Housekeeping and Disposal of Waste Material
- Work in Hazardous Spaces
- Confined or Enclosed Spaces; Testing; Neutralizing Hazard
- Boiler and Pressure Vessels
- Guarding, Belts, Gears, Pulleys, Sprockets, and Moving Parts
• Aisles and Floors
• Derailers, Bumper Blocks, and Clearance Sign
• Machine Installations and Guarding
• Sanitation
• Toilets at Construction Sites
• Washing Facilities
• Food Handling
• Medical Services and First Aid
• Illumination
Personal Protective Equipment
Handling and Storage of Materials
Fixed and Portable Ladders
Mobile Equipment
Electrical Installations
Fire Protection and Prevention
Tools
Demolition
Guarding of Walking and Working Areas
Signals, Signs, Tags, and Barricades
Fall Protection
Hazard Communication
Occupational Noise
How Does Your Safety and Health Program Rate?

Choose the most appropriate answer and place the letter in the blank.

Management Leadership and Employee Participation

Worksite Safety and Health Policy: _____

A. Workforce can explain, and fully embraces, S&H policy.
B. Majority of personnel can explain policy.
C. Some personnel can explain policy.
D. Management can provide or state (where appropriate) a policy.
E. There is no apparent policy.

Clear Goals and Objectives, Set and Communicated: _____

A. Workforce fully embraces goals and can explain desired results and measures for achieving objectives.
B. Majority of personnel can explain desired results and measures for achievement.
C. Some personnel can explain desired results and measures for achievement.
D. Management can provide or state (where appropriate) goals and objectives.
E. No apparent safety and health goals or objectives.

Management Leadership: _____

A. All personnel can give examples of management’s active commitment to safety and health.
B. Majority of personnel can give examples of management’s active commitment to safety and health.
C. Some personnel can give examples of management’s active commitment to safety and health.
D. Some evidence exists that management is committed to safety and health.
E. Safety and health does not appear to be a management value or of significant concern.

Management Example: _____

A. Personnel report management always follows the rules and addresses the safety behavior of others.
B. Management follows the rules and usually addresses the safety behavior of others.
C. Management follows the rules and occasionally addresses the safety behavior of others.
D. Management generally appears to follow basic safety and health rules.
E. Management does not appear to follow the basic safety and health rules set for others.
Employee Involvement: 

A. All personnel have ownership of safety and health goals and can describe their active roles.
B. Majority of personnel feel they have a positive impact on identifying and resolving S&H issues.
C. Some personnel feel they have a positive impact on identifying and resolving S&H issues.
D. Employees frequently feel their safety and health input will be considered by supervision.
E. Employee involvement in safety and health issues is not encouraged or rewarded.

Assigned Safety and Health Responsibilities: 

A. All personnel can explain what performance is expected of them and all elements appear to be assigned.
B. Majority of personnel can explain what performance is expected of them.
C. Some personnel can explain what performance is expected of them.
D. Evidence exists that performance expectations are spelled out for all personnel.
E. Specific job requirements and performance expectations are generally unknown or hard to find.

Authority and Resources for Safety and Health: 

A. All personnel believe they have the necessary authority and resources to meet their safety responsibilities.
B. Majority of personnel believe they have the necessary authority and resources to do their job.
C. Authority and resources are spelled out for all; but there may be a reluctance to use them.
D. Authority and resources exist, but most appear to be out of the control of the employee.
E. Personnel do not appear to have adequate authority and resources to perform assigned responsibilities.

Accountability: 

A. Personnel are held accountable and all performance is addressed with appropriate consequences.
B. Accountability systems are in place; but consequences used tend to be for negative performance only.
C. Personnel are generally held accountable; but consequences rarely follow performance.
D. Accountability exists, but it appears to be generally hit or miss, prompted by serious negative events.
E. There does not appear to be any effort at accountability.
Program Review (Quality Assurance): _____

A. In addition to a comprehensive review, a process is used which drives continuous correction.
B. A comprehensive review is conducted at least annually and drives appropriate program modifications.
C. A program review is conducted, but does not appear to drive all necessary program changes.
D. Changes in programs are driven by events such as accidents or compliance activities.
E. There is no evidence of any program review process.

Workplace Analysis

Hazard Identification (Expert Survey): _____

A. In addition to corrective action, regular expert surveys result in updated inventories.
B. Comprehensive expert surveys are conducted periodically and drive appropriate corrective action.
C. Comprehensive expert surveys are conducted; but updates and corrective action sometimes lags.
D. Qualified safety and health experts survey in response to accidents, complaints, or compliance activity.
E. There is no evidence of any comprehensive expert hazard survey having been conducted.

Hazard Identification (Change Analysis): _____

A. In addition to team analysis, employees affected are involved in all reviews.
B. A review of all planned/new facility, process, material, or equipment is conducted by a competent team.
C. Planned/new facilities, processes, materials, or equipment considered high hazard are reviewed.
D. Hazard reviews of planned/new facilities, processes, materials, or equipment are problem driven.
E. No system or requirement exists for hazard review of planned/new operations.
Building a Safety Program for Your Organization

Hazard Identification (Routine Hazard Analysis):

A. Employees have input to the analysis for their jobs.
B. A current hazard analysis exists for all jobs, processes, or phases, and is understood by all employees.
C. A current hazard analysis exists for all jobs, processes, or phases, and is understood by many employees.
D. A hazard analysis program exists; may not cover all jobs and/or few are aware of results.
E. There is no routine hazard analysis system in place at this facility.

Hazard Identification (Inspection):

A. Well-trained employees at all levels conduct frequent and varied inspections, hazards of any kind are rare.
B. Inspections are conducted by trained personnel and all items are corrected, repeated hazards seldom found.
C. Inspections are conducted by trained personnel, most items corrected; but some hazards still in evidence.
D. An inspection program exists; but coverage and corrective action is not complete; hazards in evidence.
E. There is no routine inspection program at this facility; many hazards can be found.

Hazard Reporting System:

A. Employees feel comfortable identifying and self-correcting hazards.
B. A comprehensive system for gathering hazard information exists, and is positive, rewarding, and effective.
C. A system exists for hazard reporting; employees feel they can use it; but it may be slow to respond.
D. A system exists for hazard reporting; but employees may be unclear about its use or find it unresponsive.
E. No formal hazard reporting system exists and/or employees do not appear comfortable reporting hazards.
Accident/Incident Investigation: _____

A. All loss-producing incidents and “near misses” are investigated for root cause with effective prevention.
B. All OSHA-reportable incidents are investigated and effective prevention is implemented.
C. OSHA-reportable incidents are generally investigated but cause identification/correction may be inadequate.
D. Some investigation of incidents takes place, but root cause is seldom identified, correction is spotty.
E. Injuries are either not investigated or investigation is limited to report writing required for compliance.

Injury/Illness Analysis: _____

A. All employees are fully aware of incident trends, causes, and means of prevention.
B. Trends are fully analyzed and displayed, common causes communicated, management ensures prevention.
C. Data is centrally collected and analyzed and common causes are communicated to concerned supervisors.
D. Data is centrally collected and analyzed but not widely communicated to aid prevention.
E. Little or no effort is made to analyze data for trends, causes and prevention.

Timely Hazard Control: _____

A. Hazard controls are fully in place, known to and supported by workforce, with concentration on engineering controls and reinforced/enforced safe work procedures.
B. Hazard controls are fully in place with priority to engineering controls and safe work procedures.
C. Hazard controls are fully in place but order of priority is variable.
D. Hazard controls are generally in place but priority and completeness varies.
E. Hazard control is not considered complete, effective and/or appropriate in this facility.

Facility/Equipment Maintenance: _____

A. Operators are trained to recognize maintenance needs and perform/order maintenance on schedule.
B. An effective preventive maintenance schedule is in place and applicable to all equipment.
C. A preventive maintenance schedule is in place and is usually followed.
D. A preventive maintenance schedule is in place but often allowed to slide.
E. There is little or no attention paid to preventive maintenance; breakdown maintenance is the rule.
Emergency Planning and Preparation:  _____

A. As a result of effective planning, training and drills all personnel know immediately how to respond to emergencies.
B. As a result of effective planning, training and drills most employees have a good understanding of emergency responsibilities.
C. There is an effective emergency response team but others may be uncertain of their responsibilities.
D. There is an effective emergency response plan but training and drills are weak and roles may be unclear.
E. Little or no effort is made to prepare for emergencies.

Emergency Equipment:  _____

A. Facility is fully equipped for emergencies, all systems and equipment is in place and regularly tested.
B. Facility is well equipped with appropriate emergency phones and directions, and most people know what to do.
C. Emergency phones, directions, and equipment is in place but only emergency team knows what to do.
D. Emergency phones, directions, and equipment is in place but employees show little awareness.
E. There is little evidence of an effort to provide emergency equipment and information.

Medical Program (Health Providers):  _____

A. Occupational health providers are regularly on-site, and fully involved in hazard identification and training.
B. Occupational health providers come when needed and are generally involved in assessment and training.
C. Occupational health providers are frequently consulted about significant health concerns.
D. Occupational health providers are available but normally concentrate on clinical issues.
E. Occupational health assistance is rarely requested or provided.

Medical Program (Emergency Care):  _____

A. Personnel fully trained in emergency medicine are always available on-site.
B. Personnel with basic first aid skills are always on-site.
C. Personnel with basic first aid skills are usually available with community assistance nearby.
D. Either on-site or nearby community aid is always available on every shift.
E. Neither on-site nor community aid can be ensured at all times.
Safety and Health Training

Employees Learn Hazards, How to Protect Themselves and Others: _____

A. Employees demonstrate proficiency in and support of all areas covered by training.
B. Facility is committed to high quality employee hazard training, and ensures all participate and receive regular updates.
C. Facility provides legally required training, makes effort to include all personnel.
D. Training is provided when need is apparent, experienced personnel assumed to know material.
E. Facility depends on experience and informal peer training to meet needs.

Supervisors Learn Responsibilities and Underlying Reasons: _____

A. All supervisors assist in workplace analysis, ensure physical protections, reinforce training, enforce discipline, and can explain work procedures based on training provided to them.
B. Most supervisors assist in worksite analysis, ensure physical protection, reinforce training, enforce discipline, and can explain work procedures based on training provided to them.
C. Supervisors have received basic training, appear to understand and demonstrate importance of worksite analysis, physical protections, training reinforcement, discipline, knowledge of procedures.
D. Supervisors make reasonable effort to meet safety and health responsibilities but have limited training.
E. There is no formal effort to train supervisors in safety and health responsibilities.

Managers Learn Safety and Health Program Management: _____

A. All managers have received formal training in S&H management and demonstrate full understanding.
B. All managers follow and can explain their roles in S&H program management.
C. Managers generally show a good understanding of their S&H management role and usually model it.
D. Managers are generally able to describe their S&H role; but often have trouble modeling it.
E. Managers generally show little understanding of their S&H management responsibilities.
Safety and Health Program Self-Assessment Score Sheet

Total number of A ratings ___________ × 4 = ___________
Total number of B ratings ___________ × 3 = ___________
Total number of C ratings ___________ × 2 = ___________
Total number of D ratings ___________ × 1 = ___________
Total number of E ratings ___________ × 0 = ___________

Total Score ___________

This worksheet is distributed and used by Kentucky OSHA during the review of safety and health programs. Most programs that qualify for the Voluntary Protection Program (VPP) in the state of Kentucky have scores greater than 50. This sheet can help you assess which areas of your program might need further review and improvement.
Visible management involvement — from the executive level to the frontline supervisor — forms the basis for a well-run organization. The same is true for the organization’s safety program. Safety is an intricate part of every operation or department within any organization — it does not stand alone or remain separate from the main purpose of the organization (e.g., service, goods, or products).

A successful safety and health program requires that:

- All levels of management be responsible and held accountable for providing good examples to the organization’s employees
- Infractions of the organization’s rules or safe work practices never go unnoticed
- Executive management be responsible for providing a workplace free of recognized hazards
- Safety and health expectations be set for all employee levels within the organization
  © Establish safety and health responsibilities within each job classification description
- Contractors be held to the same safety and health expectations as the organization’s employees
  © In pre-bid qualifications, specify acceptable levels of experience modifier rate (EMR) in the contract; the EMR may be obtained from the contractor’s insurance company
  © Spell out precisely the type of safety and health program that is acceptable in the contract; the very minimum is compliance with all local, state, and federal safety and health regulations (e.g., U.S. Department of Labor, Occupational Safety and Health Administration)
  © Include in the contract what will happen if the contractor fails to comply
  © Specify the arrangements that will be made for exchange of safety and health information between the organization and the contractor (e.g., MSDSs and evacuation and other emergency plans)
- A system to identify, track, and correct identified hazards and potential hazards be developed and implemented
- A safety and health policy reflecting the organization’s commitment towards safety and health — and signed by the top executive, be developed and maintained
- Written safety and health programs be developed
- The organization complies with all state or federal OSHA investigations
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Developing a Safety Program — Begin With the Basics

Many organizations have reduced their injury rates by implementing safety programs as an integral part of their overall risk management operation. Top management support, commitment and involvement are the keys to a successful safety program.

1. Each location must develop a written safety and health policy statement that clearly communicates to the staff top management’s commitment and vision for a workplace free of recognized hazards.

The written statement should include top management’s philosophy, commitment and expectations — to serve as a guide for showing that:

- All occupational injuries/illnesses can be prevented
- All operating risks can be eliminated or adequately safeguarded
- Superior safety is crucial in improving the work environment
- All levels of management will be responsible and held accountable for staff safety
- All employees will be trained in — and be expected to follow — safety and health practices established by the organization as a condition of employment

2. Each location must have in place a formal organization to manage its safety and health program. Everyone within the organization must understand his or her role and responsibility for an effective safety and health program for the staff. Regardless of who is spearheading the safety and health program, that individual (or individuals) must be placed high enough in the organization’s structure to ensure access to top management.

3. Use annual planning to establish written goals, objectives and action plans based on current performance; however, numerical goals alone are not enough. Activities, programs and development of internal controls are needed to maintain a thriving and active safety and health program.

4. Written policies and procedures must be established and reviewed with both full-time and part-time staff. Line management must oversee compliance with established policies, procedures and rules.

5. Establish an incident investigation procedure, which at the very least must be performed for all occupational fatalities, lost-time injuries/illnesses, and near misses.

6. Managers and supervisors of all departments must be held responsible and accountable for the safety management practices implemented in their area of responsibility. This includes at the very minimum the following: investigation of employee injuries and near misses, area inspections and staff training. Job descriptions are a key management tool for assigning safety responsibility and accountability.
7. Develop tools to “assess, prevent and control,” and provide ongoing surveillance of all facility operations as they relate to safety activities. These principles and practices must be applied in the planning, design and layout of any new buildings, grounds or operations. These factors must also be included in preventive maintenance activities and/or changes in any existing building, ground or operation.

8. On a periodic basis, staff and management from each department or area shall conduct routine department or area inspections. Top management should perform additional spot check audits. Because a sound inspection is based on the knowledge possessed by the inspector, before implementing a self-inspection program provide training on how to identify and correct hazards. The inspector may use a variety of inspection checklists.

9. Continual education and training must be provided and effectiveness reviewed annually. Initial training must include an orientation to the organization’s safety program, philosophy and culture, along with job-specific training. Training must also be initiated when a staff member transfers to a new job, or when there is a change in an operation. Establish a yearly training program that outlines who will conduct the training, as well as the topics and dates. Invite guest speakers for variety, and include both on- and off-the-job safety topics. Regardless of the length of the training, document it with the following information: sign-in sheets, a training course syllabus, date of training, and name of the instructor. Verify that learning has occurred through testing or on-the-job observations.

10. Establish an ongoing means of communicating safety and health issues and information. At a minimum, the communication system should include:

- Scheduled safety meetings held by management (include videos and handouts)
- Short safety meetings in the work area
- Newsletters

11. Each location must establish a means for managing the safety and health documents. The following issues should be addressed:

- Medical confidentiality
- Security
- Access
- Retention
- Distribution

12. Evaluate the entire safety and health program’s performance on an annual basis.
Creating a Safety and Health Policy

A generic safety and health policy will not fulfill the goals of your organization. Develop a specific company-wide written safety and health policy based on the company’s mission statement. If a mission statement does not exist, develop the safety and health policy based on the company’s value system, style and customer focus. For this policy to be effective it is critical to communicate it effectively and clearly to all employees.

An effective safety and health policy includes the following elements:

- **Introductory statement**: Clear, simple expression of top management’s commitment and attitude about employees’ safety and health.
- **Purpose/philosophy**: State the purpose or philosophy of the policy. For example: all occupational injuries and illnesses are preventable; all operating risk can be eliminated or adequately safeguarded. These statements remind all employees about the purpose and value of safety and health programs.
- **Management responsibilities**: State in the policy that managers at all levels are responsible and accountable for the safety and health program within their respective areas.
- **Employee responsibilities**: State in the policy that all employees will receive training in, and are expected to follow, established safety and health practices.
- **Closing statement**: Reaffirm the company’s commitment to a safe and healthy workplace.
- **Signature**: The owner, upper administration, unit or area managers and union representative, if applicable, should sign the policy. This signifies to the reader the commitment the company has for the policy.
- **Date**: Include the date the document was generated.
- **Revise the document** when there is a change in the organization’s focus or responsibilities of the individuals who have signed the statement.

Maintaining a current safety and health policy is a very important step in keeping safety awareness alive. A current policy communicates the continual commitment the company has toward the total Loss Control program — where safety and health play a major role.
Sample Safety and Health Policy

Our company believes that employees are our most important asset. Therefore, we will strive to provide a safe and healthy work environment.

Our goals include eliminating the accidents that cause injury to our employees and visitors, property loss, and interrupt our business. Management and employees will work together in planning, developing, and implementing safe and healthy work methods, practices and programs.

All managers and supervisors of this company have the responsibility to ensure that each employee receives the training and instruction necessary to perform his or her work safely. Management of this company is accountable for providing a workplace free of recognizable hazards that might cause injuries and/or illnesses. All management will set a good example by complying with company rules for safety and health.

All employees play a part in the prevention of workplace illnesses and injuries. We expect all employees to follow company policy and give their full support to safety and health issues and programs.

With the total commitment of management and employees, elimination of most accidents, injuries, and workplace illnesses are achievable goals. A safe workplace is a productive workplace.

I am (We are) personally committed to the continual improvement of our safety and health performance and will authorize the actions necessary to achieve these objectives. I will (We will) expect your participation in our safety and health efforts.

__________________________
Signatures of the President/Owner,
Top Management,

(Date)

__________________________
Union Representative (if applicable)
There are two types of systems to use when conducting a job safety analysis. The first type is direct observation, which involves watching a competent person perform a job, identifying job steps, and analyzing each step for possible problems. The second type centers on group discussion of a job. This approach uses the knowledge of the group to identify necessary steps. This method is primarily used for new jobs and when observation would be dangerous or impractical.

1. Prioritize jobs for analysis using the following criteria: possibility of serious injury, probability of injury is high, property could be damaged severely, incidents could incur significant liability or public reaction, production or quality could be affected significantly.

2. Focus on a particular job. Decide whether to analyze it by observation of the worker or by discussion among several competent workers.

3. Determine the purpose of the job, who is responsible for performing the job, what activities are involved, when and where is the job done.

4. Use the following Job Safety Analysis Worksheet to record observations. An interview of the worker should be conducted if the observer is not familiar with the job or task being analyzed.

5. Break the job into steps or a series of steps or tasks. To determine where a step begins, look for changes in activity, direction or position. Watch for potential hazards.

6. Devise methods to control or reduce each inherent hazard.

7. Write a standard job procedure or a job instruction, or devise a safe work practice as appropriate.

8. Use the procedure, instruction, or practice in employee training, retraining, safety meetings, evaluations of worker performance and incident investigations.

9. Review and revise the analysis periodically when conditions change such as when new machinery is acquired or production process is revised.

10. Reinforce employee compliance with procedures, instructions and practices.
### Job Safety Analysis Worksheet

**Job description:** _________________________  **Location:** __________________________

**Work hours:** _________________________  **Days/week:** __________________________

**Meal break(s):** _________________________  **Overtime:** __________________________

The job can ____ cannot ____ be modified to accommodate an injured or disabled worker.

**General description of job:** ______________________________________________________

______________________________________________________________________________

______________________________________________________________________________

______________________________________________________________________________

**Types of equipment, machinery, tools, etc., used on the job:** _____________________________

______________________________________________________________________________

______________________________________________________________________________

**Vehicles or moving equipment driven as part of the job:** ________________________________

______________________________________________________________________________

______________________________________________________________________________

**Percentage of time spent each day:**

- Indoors _____
- Outdoors _____

**Physical activity required:**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Never</th>
<th>Occasionally (0–2 hrs/day)</th>
<th>Frequently (2–6 hrs/day)</th>
<th>Constantly (6–8 hrs/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lifting (up to 10 lbs.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lifting (11–24 lbs.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lifting (25–50 lbs.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carrying (up to 10 lbs.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carrying (11–24 lbs.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carrying (25–50 lbs.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The heaviest item lifted on the job is ________________. It weighs ________ and is lifted ________________ times per day.

The heaviest object carried while the worker walks from place to place is ________________. It weighs ________ and is carried ________ times per day. The heaviest weight pushed or pulled is ________________. It weighs ________ and is pushed or pulled ________ times per day.

Physical movements required on the job:

<table>
<thead>
<tr>
<th></th>
<th>Never</th>
<th>Occasionally (0–2 hrs/day)</th>
<th>Frequently (2–6 hrs/day)</th>
<th>Constantly (6–8 hrs/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sitting</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standing</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twisting at neck</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twisting at waist</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bending at knees</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bending at waist</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bending at neck</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Squatting</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kneeling</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fine manipulation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Repetitive hand use</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Simple grasping</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Power grasping</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Climbing stairs</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Climbing ladders</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Walking indoors</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Walking outdoors</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Working at heights</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reaching above shoulder</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reaching at shoulder</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reaching below shoulder</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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Please mask out entire page!
Hazard Recognition

The five steps of hazard recognition are:

1. **Surveys/observation**
   - Housekeeping (oil on floor, oily rags, paper, clutter, scrap, cords on floor, trash and tools not put away)
   - Guards missing
   - Work practices — *If it does not look right, it probably is not!*
   - Personal protective equipment
   - Fire hazards (extinguishers checked once a month)
   - Use of tools (using wrench for hammer)
   - Use of lifting devices (not using handcarts)
   - Ergonomic problems (poor workplace design; repetitive motions; excessive lifting; pulling; reaching; awkward position of wrist, arm, or chairs)

2. **Review of accident reports/near misses**
   - Look for patterns with people and/or locations or similar types of accidents — *Is there something I am missing?*

3. **Listen to employees during a walk-through**
   - Listen to employees — they know better than anyone what problems exist. Make sure employees feel free to give suggestions.

4. **Meetings**
   - Meet with employees once a week — 5, 10, or 15 minutes to review any concerns or observations they may have.

5. **Job safety analysis**
   - Sequence of steps; list potential hazards; suggest solutions.

**Correcting the Problem**

1. Correct what you can “on-the-spot.”

2. See to it that the right person receives word of the problem (in writing) — your manager, maintenance/engineering, another supervisor, etc.

3. Follow up to see if it was completed!
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Please mask out entire page!
Accident (Incident) Investigation

Investigate matters of public concern or those that involve a serious injury or fatality. The use of a dollar value is not an appropriate basis for prioritizing an investigation; all accidents should be investigated and documented, including minor mishaps or near misses (see the Sample Employee Accident Investigation Report on page 32).

An investigation should cover three distinct areas:

- What took place prior to the incident
- Gather the factual information concerning the incident
- The follow-up action phase — often the most neglected aspect of the investigation

Who Should Conduct the Investigation?

- The supervisor and/or foreman are the individuals closest to the action, but they seldom have had the training to conduct an investigation.
- It is reasonable to expect the supervisor to conduct the investigation because he/she has knowledge of the area, the equipment and the personnel. The reasons that make the supervisor or foreman the ideal person to conduct the investigation are also the reasons why he/she should not do it. His/her people and equipment could have been potentially involved.
- Investigation teams provide a broad base of experience, background and credibility to the investigation.

Preparing for an Investigation

- Pre-accident planning should provide clear, concise instructions on what to do, when to do it, and who will do it.
- The pre-plan should include at least the following:
  - How to notify the individuals involved in the investigation
  - How to save lives
  - How to protect lives and property from additional loss
  - How to assure a timely investigation
- Investigator training — provide each person who may participate in an investigation with initial training and periodic follow-up training.
- Investigation kits should be developed and maintained. The kit should include the following:
  - Camera and film
  - Clipboard, paper and ink pen
  - Copy of regulations or standard operating procedures
  - Report forms
  - Personal protective equipment
  - First aid kit
  - Cassette recorder and spare cassettes
© Identification tags
© Specimen containers
© High visibility tape
© Graph paper

*Remember to check the kit periodically and refill it following every investigation!*

**Priorities**

- Prioritize the investigation process:
  - Save lives
  - Prevent further injury and property loss
- Remember — respond quickly in a manner that places no one at risk of an additional injury or exposure.
- Arrive safely to the scene. It is most unlikely that the investigator or team will be the first on the scene. The investigator will be expected to be an “expert” and advise individuals on how the matters should be handled.
- Observe the overall scene on arrival and begin planning your approach:
  - Observe the total picture.
  - Categorize your priorities.
  - Is additional help required?
  - Are the injured obtaining help?
  - Protect others from injury.
  - Protect property from further damage.
- If the scene is in the hands of the firefighters, police, or medical personnel, do not enter unless instructed to do so.
- As the incident is being investigated, be sure to:
  - Preserve the evidence
  - Protect the incident site
  - Secure the evidence
  - Keep upper management informed

**Interviewing the Witnesses**

- Take charge only after the firefighters or police have completed their job.
- Interview anyone who can aid in the investigation process.
- Conduct the interview as soon as practical to ensure the integrity of the information.
**Preservation of Evidence at the Scene**

- Time available to conduct an inspection will be limited.
- Develop rough sketches of the incident area.
- Take pictures of the area involved.
- Take samples of the evidence and clearly mark the containers (include location).

**Major Injury Categories**

- *Struck by* — injured employee was struck by an external source
- *Struck against* — injury resulted from employee hitting something
- *Slip/trip/fall* — employee lost his or her balance, resulting in an injury
- *Caught between* — fingers, hands, or arms caught by nip points or pinch points
- *Eye* — any injury to the eyes falls in this category
- *Body mechanics* — this category includes strains, back injury, or cumulative trauma; injury results from the use of the limb or torso, *not* caused by an external source
- *Laceration/cut/tear/puncture* — injury caused by using tools or sharp edges (even paper cuts)
- *Hot/cold temperature* — injury resulting from a burn or frostbite
Sample Accident Investigation Report

Employee Accident Investigation Report
This form is to be completed by the injured employee and the supervisor in charge at the time of the accident.

<table>
<thead>
<tr>
<th>FACILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAME</td>
</tr>
<tr>
<td>--------</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EMPLOYEE</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAME</td>
</tr>
<tr>
<td>--------</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SOCIAL SECURITY #</th>
<th>HIRE DATE</th>
<th>FULL TIME</th>
<th>PART TIME</th>
<th>SHIFT:</th>
<th>DAY</th>
<th>EVENING</th>
<th>NIGHT</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>DEPARTMENT</th>
<th>ADDRESS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>JOB CLASSIFICATION</th>
<th>CITY, STATE</th>
<th>HOME PHONE #</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DESCRIPTION OF ACCIDENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACCIDENT DATE</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Please describe the accident, including what employee was doing when it occurred.

Name object or substance that directly attributed to the accident.

What caused the accident? How could it have been prevented?

Describe the injury.

<table>
<thead>
<tr>
<th>BODY</th>
<th>PART</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Corrective actions taken to prevent recurrence.

<table>
<thead>
<tr>
<th>CONSUMER INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

Treatment
- First Aid
- Planned Care
- Emergency Room
- Personal Physician/Clinic
- Refused Treatment
- Other (name)

Lost Time?
- Yes
- No

Number of Days: ___

Modified/Restricted Duty?
- Yes
- No

Number of Days: ___

Did employee accept medical treatment? Yes

Was employee hospitalized? Yes

Did employee return to work the same day? Yes

Report Date /  

Employee Signature

Supervisor Signature

LC-8 Rev. 11-02 (This is not a claim form - to be used only for internal Accident Prevention purposes)
Summary of the Occupational Injuries and Illnesses Log

- Each employer who is subject to the recordkeeping requirements of the Occupational Safety and Health Act of 1970 (P.L. 91-595) and Act 154, P.A. 1974 must maintain a log of all recordable occupational injuries and illnesses for each establishment
- A MIOSHA Form 200 may be used
  - A substitute for the Miosa Form 200 may be used as long as it is detailed, easy to read, and understandable
- All occupational illness must be reported, regardless of severity (acute or chronic)
  - Occupational skin diseases or disorders
  - Dust diseases of the lungs (pneumoconioses)
  - Respiratory conditions due to toxic agents
  - Poisoning (systemic effects of toxic materials)
  - Disorders due to physical agents (other than toxic materials)
  - Disorders associated with repeated trauma
  - All other occupational illnesses
- Report workplace injuries if they result in one or all of the following:
  - Death of one or more workers
  - Loss of consciousness of one or more workers
  - Medical treatment beyond in-house first aid
  - One or more lost workdays
  - Restricted motion or restrictions to the work an employee can perform
  - Transfer of an employee to another job
- Recording requirements
  - A recordable case must be entered on the log within six workdays after learning of its occurrence
  - If the log is prepared elsewhere, a copy updated within 45 calendar days must be present at all times at all establishments
- Medical treatment
  - Treatment other than first aid, administered by a physician or a registered professional person under the standing orders of a physician
  - Not medical treatment — first aid, or one-time treatment and observation of minor scratches, cuts, burns, splinters, etc. that do not ordinarily require medical care
- Log retention
  - Logs must be maintained and kept on file for five years following the end of the calendar year to which they relate
  - Keep logs available for inspection
- Log posting
  - A copy of the totals and information following the fold line of the last page for the year must be posted by February 1 and remain in place until March 1 (see the Sample MIOSHA 200 Log on the following pages).
  - If no injuries or illnesses have occurred for the year, zeros must be entered on the totals lines
Michigan Department of Consumer & Industry Services

Log and Summary of Occupational Injuries and Illnesses

| Date of Injury | Time | Employees Name | Occupation | Department | Description of Injury or Illness | Days away from work | Job transfer | Restricted activity or other restrictions
|---------------|------|----------------|------------|------------|---------------------------------|--------------------|-------------|---------------------------------------------
| 12/01/2023    | 2:00 | John Doe       | Worker     | Accounting | Fall from a ladder               | 3                  |             | 1 week rest

Injury Description:
John Doe, a worker in the accounting department, fell from a ladder on December 1, 2023, resulting in a 3-day absence from work. He was also restricted to light duties for a week. No further restrictions were noted.

For Calendar Year 19
Page  of

Sample MIOSHA 200 Log (Side 1)
### Sample MIOSHA 200 Log (Side 2)

#### I. Log and Summary of Occupational Injuries and Illnesses

<table>
<thead>
<tr>
<th>Column</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
<th>Column 6</th>
<th>Column 7</th>
<th>Column 8</th>
<th>Column 9</th>
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<th>Column 11</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>Date</td>
<td>Injury or Illness</td>
<td>Description</td>
<td>Date of Incident</td>
<td>Days Lost</td>
<td>Work Activity</td>
<td>CAUSE OF INJURY or ILLNESS</td>
<td>Date of Injury</td>
<td>Date of Incident</td>
<td>Days Lost</td>
<td>Work Activity</td>
</tr>
<tr>
<td>1</td>
<td>Date</td>
<td>Injury or Illness</td>
<td>Description</td>
<td>Date of Incident</td>
<td>Days Lost</td>
<td>Work Activity</td>
<td>CAUSE OF INJURY or ILLNESS</td>
<td>Date of Injury</td>
<td>Date of Incident</td>
<td>Days Lost</td>
<td>Work Activity</td>
</tr>
</tbody>
</table>

#### II. Changes inExtent of our Outcomes of Injury or Illness

- The last 12 months the log must be retained there are 13 changes in the work and activities of the log to ensure that the log is complete and up to date. The log should be kept in a secure location and the date of the latest entry made in Column 4.

#### III. Finding Requirements

A copy of the log and information following the last line of the log must be made by the employer and kept at the place of business. The log should be maintained in a secure location and updated regularly. This log should be kept in a secure location and should be updated regularly.
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Workers Compensation

Workers Compensation Laws

- In the United States there are at least 53 separate workers compensation laws
- Each state has its own workers compensation law
- The Federal Government has three compensation programs: Federal Employees Compensation Act (FECA), Longshoremen’s and Harbor Workers Act and the District of Columbia Workmen’s Compensation Act
- There are two types of workers compensation laws:
  - **Compulsory law** — all employers under this jurisdiction are required to accept the provisions and provide benefits as specified
  - **Elective law** — all employers under this jurisdiction have the right to accept or reject participation
    - If an employer rejects compliance with the law, the result is the loss of the three common-law defenses, which renders the employer defenseless.
- Most of the laws currently are compulsory

Workers Compensation Objectives

- Promptly replace lost income and provide medical treatment
- Stimulate employer interest in accident investigation, reduction, and prevention
- Provide rehabilitation to restore earning and working capability
- Reduce costly litigation and delays
- Reduce financial drain on public and private charities

Who Is Covered By Workers Compensation?

- Ninety percent of all hourly and salaried employees are covered by workers compensation
- Some employment categories are excluded (these vary from state to state); the most common are:
  - Self-employed (owner)
  - Professional athletes
  - Short-term temporary laborers
  - Seasonal or agricultural farm laborers
  - Volunteer workers
  - Workers covered by other labor laws (such as railroad and maritime workers who are specifically listed under the acts)
Types of Disabilities

- **Temporary Total Disability** — the worker is completely unable to work for a period of time because of a job-related injury; full recovery and return to work are expected; most disability cases are of this type
- **Temporary Partial Disability** — the worker is unable to perform his or her regular job duties while recovering from the injury, but has the ability to work at a position requiring less stress and strain on the worker; full recovery and return to work are expected
- **Permanent Partial Disability** — the worker has some permanent reduction associated with his or her work capability, but is still able to be employed
- **Permanent Total Disability** — the worker is injured on the job and can no longer work, even following medical and rehabilitative treatment

Workers Compensation Benefits

- Payment for expenses associated with medical, burial, lost wages, and impairments
- Physical and vocational rehabilitation
- Some workers compensation laws provide for mental rehabilitation

Workers Compensation Cost

- An estimated $20 billion is spent by United States employers for workers compensation
  - © 22% is spent on medical care
  - © 46% is spent on compensation payments
- Workers compensation insurance premiums are based on employee payrolls
- The National Council on Compensation Insurance, an actuarial organization, sets basic premium rates for most states
- State rates reflect the different risks and claim histories associated with the different types of operations or activities

Type of Rates

There are four key methods used to establish insurance premium rates; all are dependent on the applicable compensation laws.

- **Manual Rate** — premiums are applied directly from the state rate book
- **Schedule Rate** — employers received a percentage reduction in premium rates by reducing specific hazard activities, which are listed in a schedule
- **Experience Rating Prospective** — the accident experience record of the policyholder will influence future premiums
  - © The experience period will not be more than three years, beginning four years before, and ending one year prior to, the start date of the experience modification
Immediate past-year results will impact the organization/company premiums for three policy years — beginning one policy year after the year in which the loss was incurred.

Each state sets average losses by employment classification.

The following formula is used to determine the expected losses:

\[
\text{Average Losses (set by state)} \times \text{Payroll for Category} = \text{Expected Losses}
\]

When the employer’s real time losses exceed the expected state average loss rates a surcharge will be added to the policyholder cost.

When the employer’s real time losses are less than the expected state average loss rates a credit will be applied to the policyholder.

A surcharge or credit is called an **experience multiplier, experience modification, or experience rating modifier (MOD rate)** — it is an incentive for implementing a company-wide loss control program.

Examples of MOD rate equations:

The past three-year history of experience rating modifiers for a roofing operation with 1.32, 1.04, and 0.88 payment history would be:

\[
\begin{align*}
1.32 & \times \$38,223 = \$50,454.36 \\
1.04 & \times \$38,223 = \$39,751.92 \\
1.00 & \times \$38,223 = \$38,223.00 \\
0.88 & \times \$38,223 = \$33,636.24
\end{align*}
\]

A good MOD rate is equal to 1.0 or less.

• **Retrospective rating** — relates premiums to experience during the current policy period; the employer pays the expected premium at the start of the policy period, then adjustments may be made at the end of the period reflecting injury/loss during that time.

• **Premium discounts** — administrative costs are relatively less for a large policy than a small policy; states permit discounts for premiums in graduated steps based on total premiums paid.

**Hold Down the Cost of Workers Compensation**

• Prevent accidents from happening in the first place by having a formal organization for managing a company/organization-wide safety and health program.

• Develop a written safety and health policy statement that is based on company/organization values.

  • Clearly spell out and demonstrate daily top management’s commitment and vision for a workplace free of recognized hazards.

• Report all incidents immediately.

  • Injury claims reported 10 days after the event may result in a 50% increase in litigation.

• Monitor claims of all types by reviewing your loss run information.

• Refer injured workers to a recommended health care provider.

• Establish a return-to-work program.
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Costs Associated With On-the-Job Injuries

• The top six states with the highest workers compensation claims:
  1. Texas
  2. Pennsylvania
  3. Ohio
  4. Florida
  5. New York
  6. Michigan

• Body parts (based on the percent of claims) most often injured in work-related activities:
  1. Eyes and head 8%
  2. Neck 2%
  3. Arms 10%
  4. Hands and fingers 18%
  5. Back 22%
  6. Trunk 9%
  7. Legs 13%
  8. Feet and toes 6%
  9. Body system 2%
 10. Multiple injuries 10%

• Ranking of workers compensation based on number of claims:
  1. Back
  2. Hands and fingers
  3. Trunk
  4. Leg
  5. Multiple injuries

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Return-to-Work — Modified Duty

The goal of modified duty is to return the injured worker to work as soon as possible. The program does not ask persons who are ill or in pain to return to work, but it does identify tasks that serve the company and can be carried out on a temporary basis until the employee is fully recovered. This option has been proven to help the employee feel productive rather than disabled, and tends to speed the recovery process. The plan also reduces the number of lost time days, which in turn reduces premium costs.

Modified Work Programs

Listed below are some basic steps to use when developing a modified work program.

1. Outline job task function (or combination of functions) that a worker, temporarily or permanently disabled, can safely perform.
2. Make sure work is productive and has value.
3. Communicate with the treating physician, who must determine if the injured worker is capable of returning to work. Communicate by sending a letter and job description of work options available, and ask for the physician’s cooperation in returning the employee to work.
4. Consider inviting area physicians or your local clinic physician to tour your facility and become familiar with your operation. Establish a relationship.

Maintenance of Records and Documents

A system must be established for documenting, maintaining, and managing records associated with the company’s safety and health program. These records include accidents and near misses, the injury and illness log, employee medical reports, training, safety and health meetings, regulatory-specific requirements, incident investigation, workplace evaluations, and corrective measures implemented. The following key items should be addressed in any filing system selected to manage the safety and health records and documents:

- Regulator record retention requirements
- Confidentiality
- Who has access to the records
Look for These Key Elements When Choosing a Medical Provider:

- Does the provider have a broad base of occupational services?
- Is the staff available and knowledgeable in the wide areas of regulatory compliance (MIOSHA, EPA, DOT, to name a few)?
- Will the staff work well with the type of management style established at your organization or company?
- Does this provider have a proven track record in the area of Occupational Health? Do they have references you may check?
Medical Provider’s Key Services

Name of Provider: ______________________________________________________________

Date of Review: __________________________________________________________________

Listed below are key services a medical provider will need in order to service your employees. Rank the type of service on a scale of 1–5, with 5 being the highest and 1 the lowest. A zero will indicate the material does not apply.

Services provided:

Prevention:

_______ Pre-placement Exams
_______ Drug Screening
_______ Spirometry
_______ Hearing Conservation
_______ Ergonomic Program
_______ Industrial Hygiene Program
_______ Respiratory Exams
_______ Surveillance Exams

Acute Care (Short Term):

_______ Initial Assessment
_______ Consultations

Rehabilitation Programs:

_______ Job Safety Analysis
_______ Work Conditioning/Hardening
_______ Functional Capacity Exams
_______ Physical Capacity Exam

Employee Assistance Program:

_______ Drug
_______ Alcohol
Experience, Education and Knowledge of the Staff:

- Board Certified Occupational Health Physicians
- Board Certified Physical Therapists
- Board Certified Industrial Hygienist
- Board Certified Occupational Nurses
- Board Certified Speech Pathologist
- Spirometry Certified
- Vocational Rehabilitation Counselors

Knowledge in Regulations, such as:

- DOT
- Hearing Conservation
- Respiratory Protection
- Bloodborne Pathogen
- Hazmat
- Confined Space
- ADA
- Worker Compensation Laws

Availability and Communication Capability:

- Obtain an appointment within 24 hours of request
- Available all shifts your organization or company works
- Location convenient
- Able to come to the worksite, with a mobile unit
- Phone calls are provided after treatment
- Fax, confidential
- E-mail
- 1-800 numbers for out-of-state employees
- Written reports provided within 24 hours
Job Description

- Establish a written job description for each job, if one has not been developed.
- Include in this description the majority of tasks an individual in this position will perform, as well as knowledge and skill necessary to perform the job.
- List and label all essential and non-essential tasks, as well as the physical demands of the job.

Job Analysis

The following items should be reviewed and recorded for each job classification within your organization or company. The job analysis will have to be updated as jobs change, are deleted, or added to your organization. It is recommended the analyses be reviewed annually and signed off.

- **Physical Activity:**
  - Walking
  - Climbing
  - Balancing
  - Lifting
  - Pushing
  - Pulling
  - Carrying
  - Bending
  - Other

- **Working Environment:**
  - Noise
  - Dust
  - Paint
  - Humidity
  - Standing long period of times on hard surfaces
  - Exposure to hazardous chemicals and materials
  - Other

- **Intensity of the work activity.** How often is the task in question performed?
  Describe: ________________________________________________________________
  ________________________________________________________________
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Influencing Individual Behavior Changes

As a supervisor you are in the position of coaxing individuals to accept change. This process should be well planned and follow these steps:

- Plan ahead by identifying how this change will benefit the individual.
- Establish a good time to discuss the change.
- Discuss the change and deal with the individual’s concerns.
- Solve the problems that could come from the change together.
- Gain a commitment — even if the individual is not willing to change, ask him or her to try it out briefly.

Nine mistakes to avoid when trying to bring about a change:

1. Acting without obtaining input
2. Getting input but ignoring it
3. Acting before planning ahead
4. Failing to keep in mind change may threaten some individuals
5. Forgetting to explain what is in it for the individuals involved in the change
6. Being impatient
7. Failing to recognize small, incremental changes
8. Trying too much too fast
9. Not communicating

Techniques to influence individual behavior:

© **Modeling** — the supervisor consistently demonstrates the proper technique for doing the job, accepting the responsibility for reporting and seeking corrections for unsafe acts and conditions

© **Rewards** — provide positive feedback when you observe the individual performing the work in a safe manner

© **Correction** — make corrections at the time you observe the individual performing an unsafe act or creating an unsafe condition

Five step to use when correcting an unsafe behavior:

1. Identify the unsafe act
2. Restate your position — it is not necessary to apologize
3. Demonstrate the correct method
4. Ensure the individual understands the required behavior change
5. Emphasize the importance of the individual’s safety to you and the company
Notes