

New Staff

We are pleased to welcome Betsy Parrish to our team as our administrative assistant, the person who makes things look good. Betsy is formatting our documents, assisting with safety grants, getting out the safety flash cards, and mostly, helping to keep us organized. She has a degree in American History and has worked in the Office of the Attorney General of Minnesota. An Army veteran, she has a passion for language, spelling and trivia. If you get Betsy on the phone, please welcome her to the CHESS team.

OSHA 300 Reminder

If you have more than ten employees at any time during the year, you are required to keep a log of an injuries or illnesses that occur in the workplace and that require more than first aid. A summary of that log, the OSHA 300, must be posted from February 1 through April 30. The log itself, with employee names on it, should not be posted.

Now that you've struggled with completing and posting the OSHA 300 summary, why not let us do it for you next year? Provided you tell us about injuries right away, we'll maintain the OSHA log for our maintenance clients.

Posters

Every business, it seems, gets phone calls and letters about required OSHA posters. These sound important and official, warning of very large fines if you don't have the right posters – which you can order from them right now.

OSHA has been so frustrated by this threatening marketing that they encourage reporting of misleading solicitations. All the required posters can be downloaded at no cost from OSHA and the Department of Labor websites. If you prefer all-in-one laminated posters, you'll have to purchase those from a commercial enterprise. But you don't have to buy them each year – they don't change that often.

What Posters? Where do I get them?

If you're not sure what posters you need, there's a handy federal poster adviser at <http://www.dol.gov/elaws/posters.htm>. The state requires you to have posters about these: age discrimination rights, state and federal minimum wage, Workers' Compensation (remember to write in the name of your carrier), OSHA Safety and Health Protection on the Job, and unemployment rights.

As of April 30, 2012, most private employers must also post a notice on employee rights under the National Labor Relations Act. This is available from the NLRB at <http://www.nlr.gov/poster>. (We will be mailing this to clients with invoices at the end of March.)

Posters can be downloaded or ordered for free from <http://www.dol.gov/compliance/topics/posters.htm> or, in Minnesota, from <http://www.dli.mn.gov/LS/Posters.asp>

Where should I put them?

Posters need to be located where employees will see them. This could be in the lunchroom or near the time clock.

How often do I need to update them?

Not often. The most recent OSHA poster is from 2003. New posters are required when there is a significant change in a Labor or OSHA regulation or when minimum wage increases. The NLRB is the only new poster.



Workers' Comp

We promised a column on how a good safety program and early reporting help manage workers' comp claims. In previous newsletters we discussed how workers' comp premiums are calculated and what impacts mod rates. In our Fall 2011 newsletter



(<http://www.chess-safety.com/newsletters.html>) we discussed good hiring practices, one of eight components to managing workers' comp claims.

Another component to managing workers' comp and reducing costs is having a good safety program, to prevent the injuries from occurring.

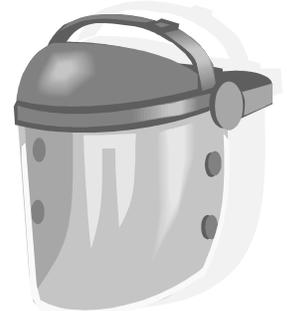
Employees need to know what is expected of them. As an employer, you have an obligation to provide a workplace free from recognized hazards. Developing safety programs is one way to think through what hazards might exist in your workplace and how those are going to be addressed.

A basic safety program should include the following:

- A general policy statement that reflects management's commitment to safety.
- Responsibilities. Who will be responsible for the different parts to your safety program? Who has general oversight? Who will have enforcement responsibilities? Who participates in training? Some of these responsibilities may be assigned to one person. Some may be the responsibilities of all employees, or all supervisors.
- Communication. Write down how you'll communicate safety policies, procedures, and responsibilities to employees. Will it be in meetings, on a safety bulletin board, through email?
- Hazard identification. How are you going to identify hazards? This could be through employee and management suggestions, building inspections, process reviews, job safety analyses, etc.

- Hazard reduction. Once you've identified hazards, how will you manage them? Who is responsible for eliminating or reducing those hazards?
- Enforcement. If employees violate safety policies or procedures without consequences, you don't have a safety program. Write out what you'll do if employees show a disregard for working safety and correctly. Will you have written reprimands? Will you dismiss employees for violating safety rules?
- Injury investigation. Once an injury has occurred, you should want to ensure it doesn't recur. You should have a policy to investigate what happened, so you can make the changes needed to prevent a recurrence.
- Safety rules. Define several specific expectations or rules for employees. These should be measurable and obtainable. Examples are:
 - Show up for work in physical condition to work, not under the influence of drugs or alcohol.
 - No horseplay.
 - Never remove guards from equipment unless authorized to do so and the equipment is locked out.
 - Participate in safety training.

This basic safety program serves as the backbone for your other required safety programs. Spell out responsibilities here, and it feeds well into, for instance, your personal protective equipment program, which defines what PPE is needed for which tasks.



Questions? Please do not hesitate to contact us if you have safety-related questions or just need more information about something or the services we offer. Please contact us by phone (651-481-9787) or email if you no longer want to receive newsletters or if you want them in a different format (email, mail).

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Workers' Comp (continued from p. 2)

Once you have the program on paper, you need to make sure it exists in real life. Employees need to know what it requires. And it has to be followed, by your employees and by your management.

The one factor that determines if your safety program works is the example management sets. If the company owner/manager makes it clear that he or she takes safety seriously, that safety and compliance with safety programs is important, and that working safely is an integral part of the job, employees will work safer. When we've seen management send a message that production is more important than safety, we see injuries increase. And with that, costs increase.

A very simple example of the importance of a good, enforced safety program: A company doesn't enforce a policy on wearing safety eyewear. An employee gets rust in his eye, requiring a trip to a doctor. That trip takes time away from work, for the employee and for the supervisor or coworker who brings the employee to the clinic. Back at the shop, someone has to fill out the paperwork, and that takes time. OSHA figures the average cost of an eye injury is over \$1400. At 5% profit, you need an extra \$28,000 in income to pay for that. A \$10 pair of safety glasses and enforcing the use of safety glasses suddenly looks like a bargain.

The key message: writing down what you expect of your employees is the first step towards making sure they work safely. The second step: make sure they know what's expected of them, and hold them – and yourself – to that standard.

In the next newsletter we will discuss injury care and return to work programs.

Regulatory Update

In recent inspections MNOSHA has made it clear they would like to see safety programs reviewed annually. The AWAIR and lockout/tagout require annual review. Just as you review your financial status and perhaps develop marketing goals for the year, it is a

good idea to establish annual safety goals (and put them in writing).

Minnesota OSHA has issued new rules for window washing operations. A construction breakfast in May, sponsored by MNOSHA, will review these new policies. For more information, see <http://www.dli.mn.gov/OSHA/ConstructionBreakfast.asp>.



The MPCA is asking companies that submitted for storm water permit exemption to review their operations and facilities to ensure they are still eligible for the exemption. Open dumpsters are a particularly common violation.

The Chemical Safety Board has issued a new video on three iron dust fires. The video can be viewed at <http://www.csb.gov/>.

We are still waiting for action from OSHA on Globally Harmonized System (GHS) for labeling and classifying chemicals. GHS would change material safety data sheets, so multi-national corporations could use the same safety data sheet in many different countries. It would also standardize some of the language on data sheets and on labels. To adopt GHS here, OSHA needs to change the Hazard Communication Standard. As the final regulatory hurdle was just passed, we expect the final rule to be published soon.

A new labor poster will be required as of April 30. See the posters article above.

Commercial Driver License holders will now have to complete a medical self-certification form. More information is available at the Driver and Vehicle Services website: <https://dps.mn.gov/divisions/dvs/Pages/commercial-driver-license-medical-self-certification.aspx>

Where we'll be

Watch for CHESS at the MN Safety Conference May 8-9.

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