



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

February 2019

Tony Kuehn  
CSP, OHST, ALCM  
Director of Health and Safety Services  
Integrated Loss Control, Inc.

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## Objectives:

- **Review OSHA History**
- **Review OSHA Requirements-(Using Examples-AWAIR, RTK, Respirators, PPE, SiO<sub>2</sub>)**
- **Best Industry Practice for Loss Control (OSHA is Minimal)**
- **Sample Plans, Program Structure**
- **Sustainability**



NORTH RISK PARTNERS™



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## **Reasonable Business Organization Question:**

**Who is OSHA, which rules apply to me?**

**How Do I Find Out About New Standards?**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## OSHA History:

- **Created 1970-Federal and State Specific**
- **Covers All Industries**
  - **29 CFR 1910-General Industry**
  - **29 CFR 1926 Construction**
- **Health and Safety Requirements Not Optional (*A Core Business Function*)**
- **Compliance Expectation**
  - **Triggered by Operations, Not Just Employee Counts**
- **Fines for Non-Compliance**



NORTH RISK PARTNERS™



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## State vs Federal Programs

**State Plans are OSHA-approved workplace safety and health programs operated by individual states or U.S. territories. There are currently 22 State Plans covering both private sector and state and local government workers, and there are six State Plans covering only state and local government workers.**



NORTH RISK PARTNERS™



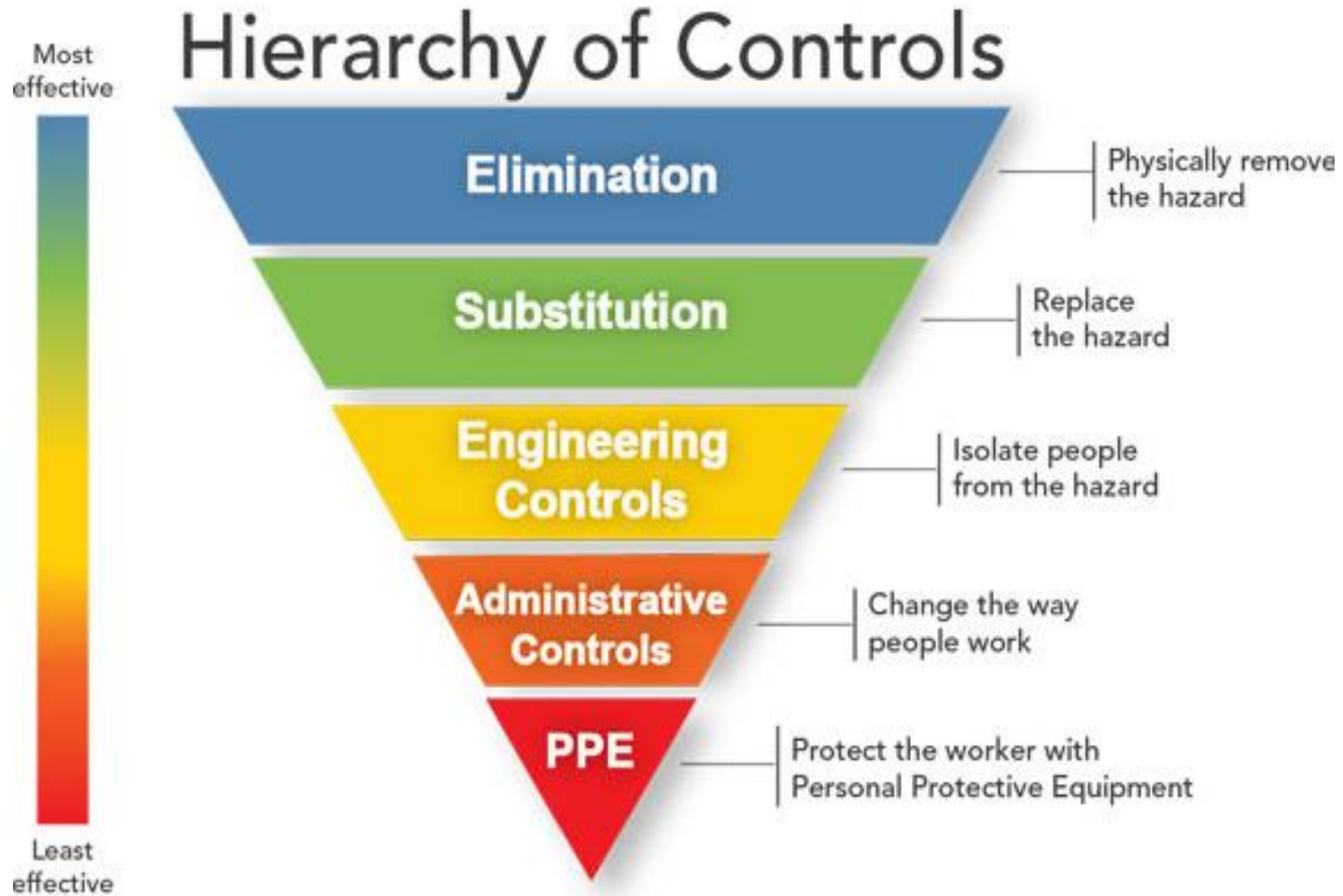
# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

- **OSHA Standard May be Administrative (AWAIR, 300 logs)**
- **OSHA Standard Industry/Task Specific (1910, 1926 Others)**
- **OSHA Standard May be Lateral**
  - **Right to Know(some are state specific as in MN)**
  - **Hearing Conservation-Noise**
  - **Respiratory Protection (Voluntary and Mandatory)**
  - **PPE**
- **OSHA Standard May be Chemical Specific**
  - **Lead**
  - **Respirable Crystalline Silica**
- **Best Industry Practice (Above OSHA Minimum)**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## Excuses Are Abuses

### Excuses include:

- 1) We didn't know-As a core function its on the employer to find out.
- 2) We are too busy (focusing only on production)
- 3) Its time consuming (multi-tasking , no one assigned or made available)
- 4) Don't have a safety director, won't spend money on a consultant either (cost prohibitive)-we are only a small operation
- 5) No funding available for H &S efforts ( how much do you have in reserves for loss of an employee (maybe a key employee), WC costs, liability claim, fines, replacement equipment, damaged property, etc.??)
- 6) We have never had a claim, accident or OSHA visit (complacency)
- 7) Typically a plan is very hard to create after the fact, post injury, and your reputation has already been tainted. **(But its not impossible-and very worth while!!!)**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## **Subjects to Consider for Your Program Development Plan:**

- What Are Your Operations( core product, service)??
- OSHA elements (AWAIR, specific standards)
- Review Loss History (problem areas)
- Review Where You Have Been, Where Do You Want to Go???
- Employee, Workteam Input
- Trade Association, Work Groups, Networking
- Review Competitor's Plans (those running a successful business)





# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

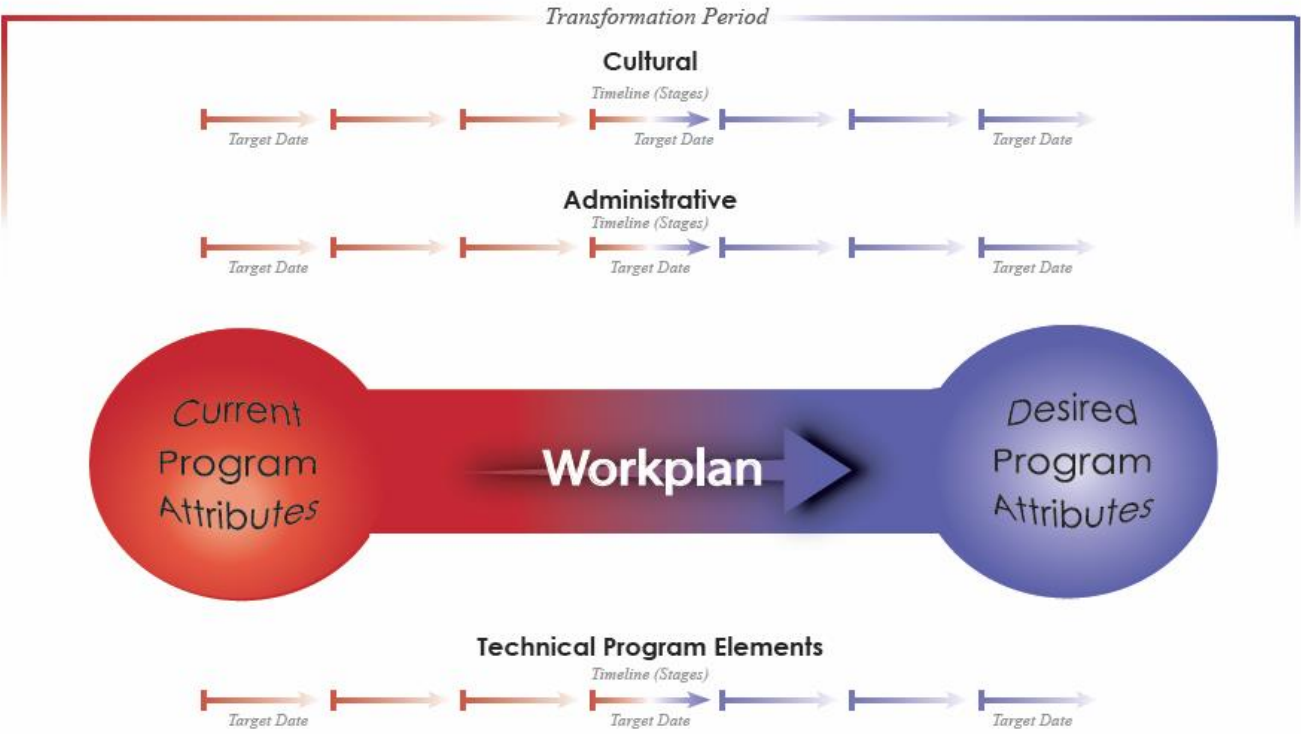
## **Sample Plans-What Does One Look Like?**

*“By failing to prepare you are preparing to fail”-Benjamin Franklin*

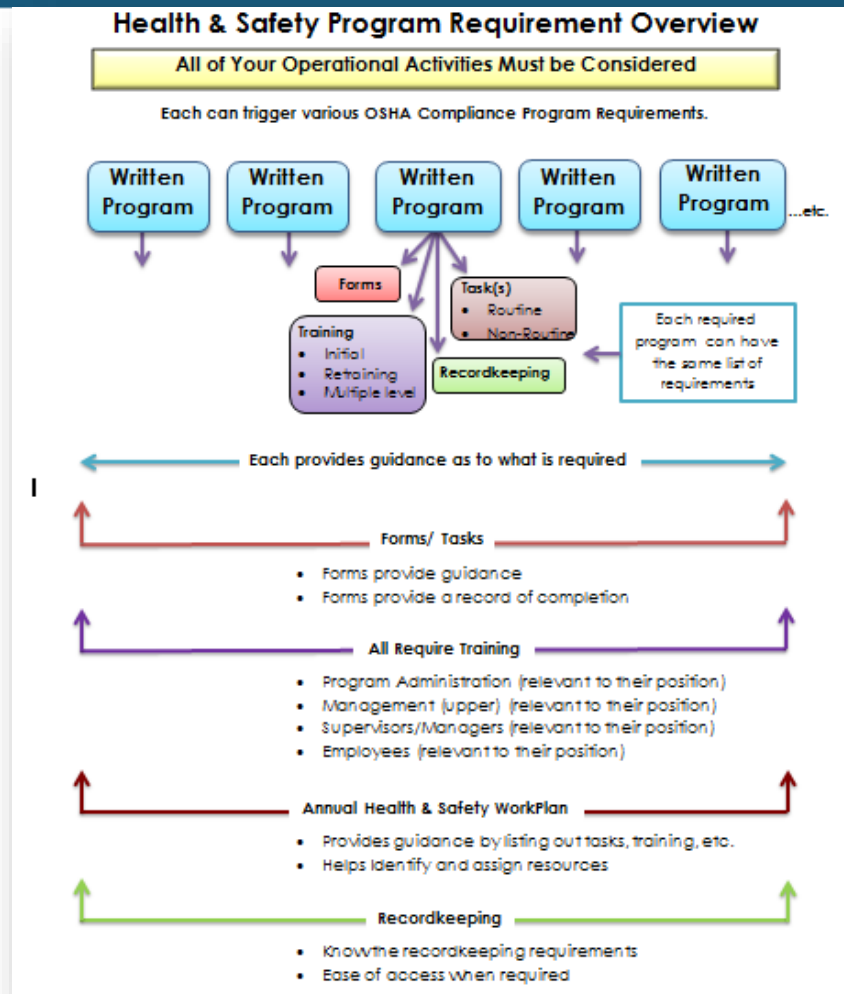


# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## Integrated Loss Control, Inc. Loss Control Program Strategic Plan



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Each Program provides guidance as to what is required**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

## **Forms/Tasks**

- **Forms Provide Guidance**
- **Forms Provide A Record of Completion**



**NORTH RISK PARTNERS™**

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

## **All Require Training**

- **Program Administration (relevant to their position)**
- **Management(relevant to their position)**
- **Supervisors/Manager(relevant to their position)**
- **Employees(relevant to their position)**



**NORTH RISK PARTNERS™**

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

## **Annual Health and Safety Workplan**

- **Provides Guidance by Listing out tasks, training, etc.**
- **Helps Identify and assign resources**



**NORTH RISK PARTNERS™**

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

Written  
Program

Written  
Program

Written  
Program

Written  
Program

Written  
Program

## Recordkeeping

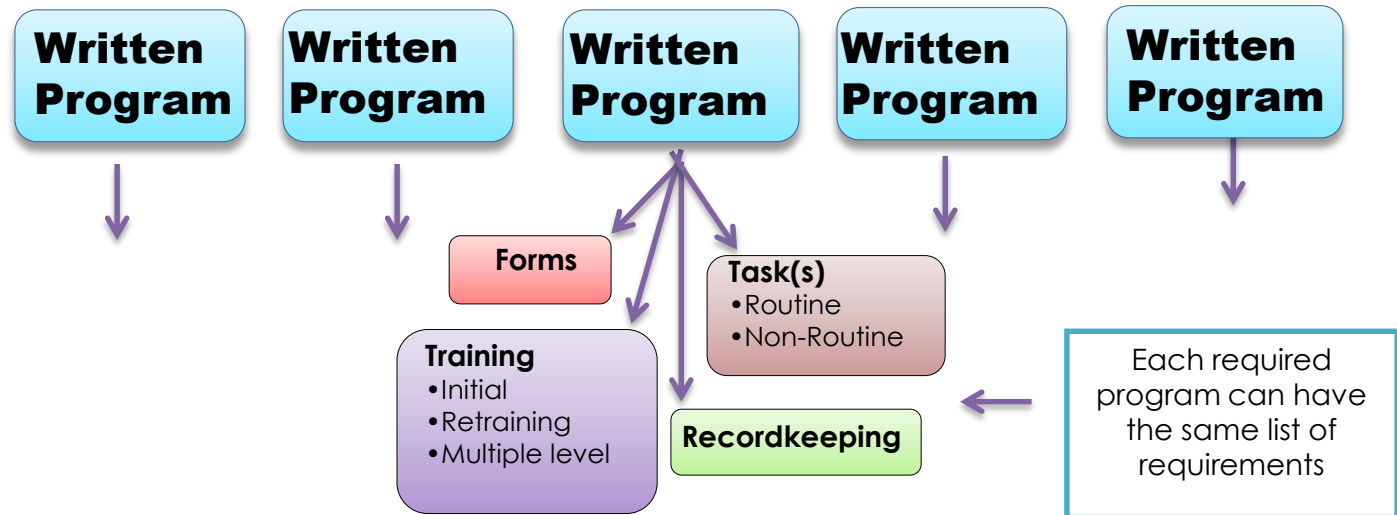
- **Know the Recordkeeping Requirements (including retention)**
- **Ease of Access When Required (sustainability)**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

Each can trigger various OSHA Compliance Program Requirements.



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## **AWAIR Requirements:**

**Clearly stated goals and objectives.**

**Program must be written and describe:**

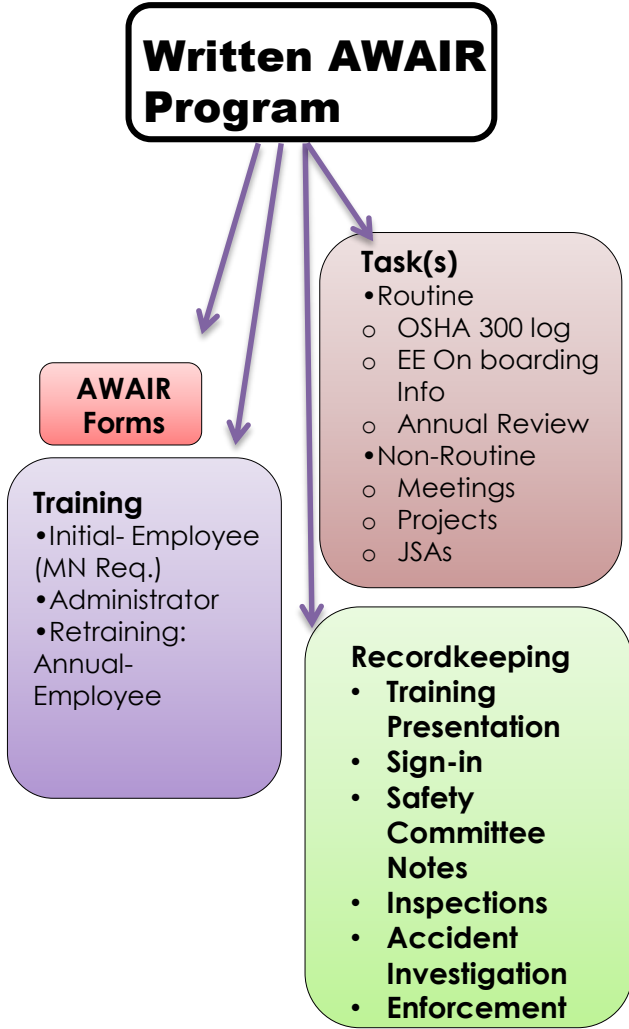
- **Responsibilities of all employees.**
- **Methods used to identify and control hazards.**
- **How the program will be communicated to employees.**
  - **Training Methods (e.g. on boarding, annual)**
- **Accident investigations and corrective action.**
- **Enforcement of safe work practices and rules.**

**Policy Statement and includes Annual, documented review of program and goals.**

**Employees Need to Know Where to See a Copy.**



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts



**Note:** AWAIR is and Administrative Program that describes how the employer manages their safety program relating to specific requirement set by MNOSHA. The AWAIR program does not meet the specific compliance programs required by State or Federal OSHA



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## ABC Client

### Administrative Health and Safety/ AWAIR Program

The following summary information about this program area is provided so that we may continually monitor operations to determine if the need for this program changes in the future.

- The regulation applies to Minnesota employers in certain targeted industries or who meet certain criteria based on Workers' Compensation data.
- Similar regulations may exist in other jurisdictions.
- Recommended for all employers.
- The employer must establish clearly-stated goals and objectives and develop a program which describes the accountability of all levels of employees, especially management, establishes procedures for identifying and controlling workplace hazards, identifies safety rules and enforcement policy, describes how provides for training and communication of the program and describes how accidents will be investigated.
- A written program is required.



If you have questions regarding this topic, please contact Integrated Loss Control, Inc. at: 1-888-475-6525 or e-mail: [ILC](mailto:ILC)

You may also visit OSHA's website to learn more. [General Industry](#) | [Construction Industry](#)

### Policy

It is the policy of ABC Client to provide our employees with a workplace free of recognized health and safety hazards in an effort to conserve our human, physical and financial resources. The health and well-being of all personnel is important.

The safety of our employees is our first consideration. Accidents and injuries are not only costly to the individual workers and us but often disastrous to the future of his or her family. It is our policy that everything within reason will be done to maintain a safe and healthy workplace for all employees. We support the concept of returning injured employees at the earliest, medically possible opportunity to a productive position here. Each employee has a place in our Accident Prevention Program and is expected to cooperate fully in all measures taken in loss prevention.

This program will be reviewed, at minimum annually, by the Safety Program Coordinator. The purpose of this review is to ensure its ongoing adequacy, effectiveness and accuracy, as well as to identify any opportunities for improvement. This will include a review of all policies, programs, procedures, training records and other available written materials which pertain to the program.



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## Applications & Definitions

This program is intended to serve as an overview of all Health and Safety programs. It outlines the philosophy by which we will develop, implement and maintain all other safety programs which concern more specific topics.

This program applies to temporary employees ("temps") and other such "non-employees" whose work is directed by us. For the purpose of the administration of this program, there will be no difference between our employees and temporary employees. The training and communication elements of this program will be fulfilled by the Safety Program Coordinator.

Contractors (electricians, plumbers, etc.) and visitors will also be required to comply with appropriate portions of this program. This program will be communicated to contractors and visitors by Maintenance.

## The Administrative Health and Safety/ AWAIR Program

### 1. Goals/ Objectives of the Health and Safety Program

**1.1 General.** The ultimate goal of the Health and Safety Program is to prevent and reduce employee injuries and illnesses through the administration of an effective Health and Safety Program. Elements of this program are:

- Maintenance of safe and healthful working conditions
- Ensuring employee adherence to proper operating practices and procedures designed to prevent injuries and illness.
- Observing and applying Federal, State and Local safety regulations.
- Each employee is properly trained and instructed on job procedures prior to job assignments.
- Providing safety training for all employees as a means of communicating policy and usable knowledge.
- Conducting periodic safety and fire inspections to identify potential hazards in the workplace.
- Conducting accident investigations to determine the cause of accidents and the actions necessary to prevent future reoccurrences.

**1.2 Specific Goals and Objectives.** Quantifiable goals and objectives are identified to measure our progress to the above state goals. As a rule, these goals and objectives are measurable, and attainable. They are provided in the [Annual Health and Safety Workplan](#).

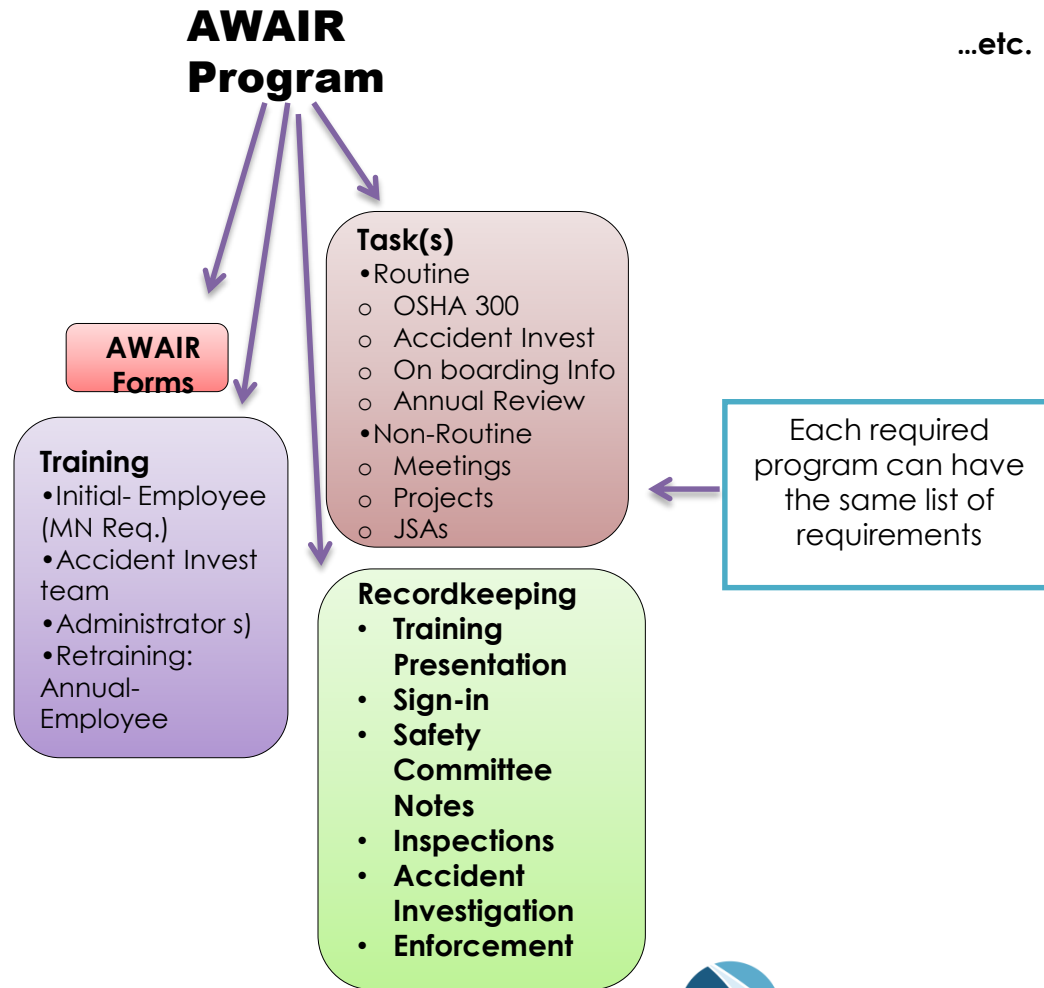
**1.3 Responsibility for Goal and Objective Setting.** Goals and objectives are established by the President and the Safety Program Coordinator.

**1.4 Time Frame.** Our Health and Safety efforts will be an ongoing effort and will be updated and reviewed annually or as often as necessary.



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts




NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## Sample Plans:

ABC Client



Annual Loss Control Workplans	
Years	2018
	2019
	2020
	2021
	2022
	2023
	2024
	2025
	2026
	2027

Version 11.0

Developed by Integrated Loss Control, Inc. [www.ilci.com](http://www.ilci.com)





# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## **Sample Plan Goals-Developed at Corporate Level , Referenced in Employee Safety Committee Notes, Team Meetings:**

- 1. Plan to Reduce Slips, Trips and Falls by 25%**
- 2. Training Session Schedules-Deadlines, Due Dates**
- 3. Plan to Reduce Recordable Accidents (areas A, B and C)**
- 4. Plan to Reduce the Numbers of Strains Involving the Hand( Press 14-16, Main Plant)**
- 5. Plan to Reduce Cuts-Metals Assembly Area from 12 (2017) to 5 or less (2018) by implementing cut reduction program, PPE upgrade**
  - **Reduce employee handling of sharp metal,**
    - **Suction lifts, automation**
    - **Laser system, de-commissioning shears**
  - **Requiring tight fitting cut protection PPE in work areas**
  - **Disciplinary Action for EE not wearing assigned PPE (inspections)**



NORTH RISK PARTNERS™

## **Beware of Training Materials Supported by Generic Compliance Programs**

- **Do They Apply to Your Operations?**
- **Was the Training Complete?**
- **Was the Training Documented?**
- **How Does it Compare to the OSHA Standard, Best Practices?**



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## **Examples:**

- **Right to Know-Nonspecific safety training materials and/or written programs such as online video libraries, must be supplemented with training containing information on the specific list of hazardous substances, biological agents and harmful physical agents .**
- **Training in Biological Hazard (blood and Other potential Infectious Materials (OPIM) is required for all employers (MN OSHA)**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## **Taking Credit for Prior Activities, Moving from Failure to Success**

- **What Does the Document Trail Look Like?**
- **Draw a New Line in the Sand to Move Forward**
- **Keep Relevant Source Documents, Training Aids, etc.**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

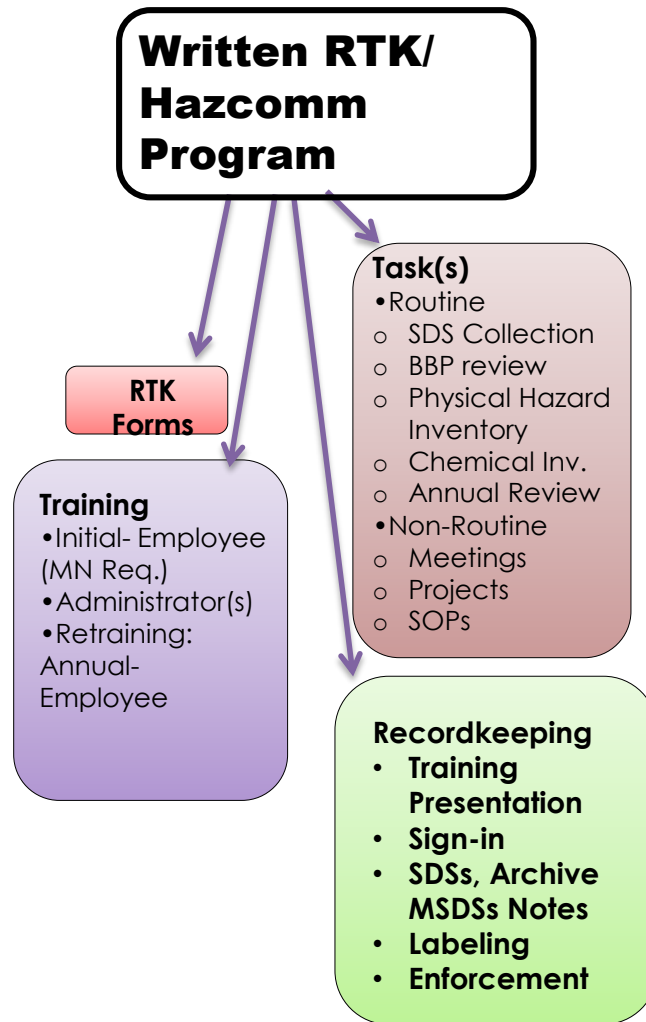
## **The Good Faith Effort**

- **Does it Meet Compliance?**
  - *Again Look at the Standard*
- **Who Was Involved?**
- **Records Available?**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

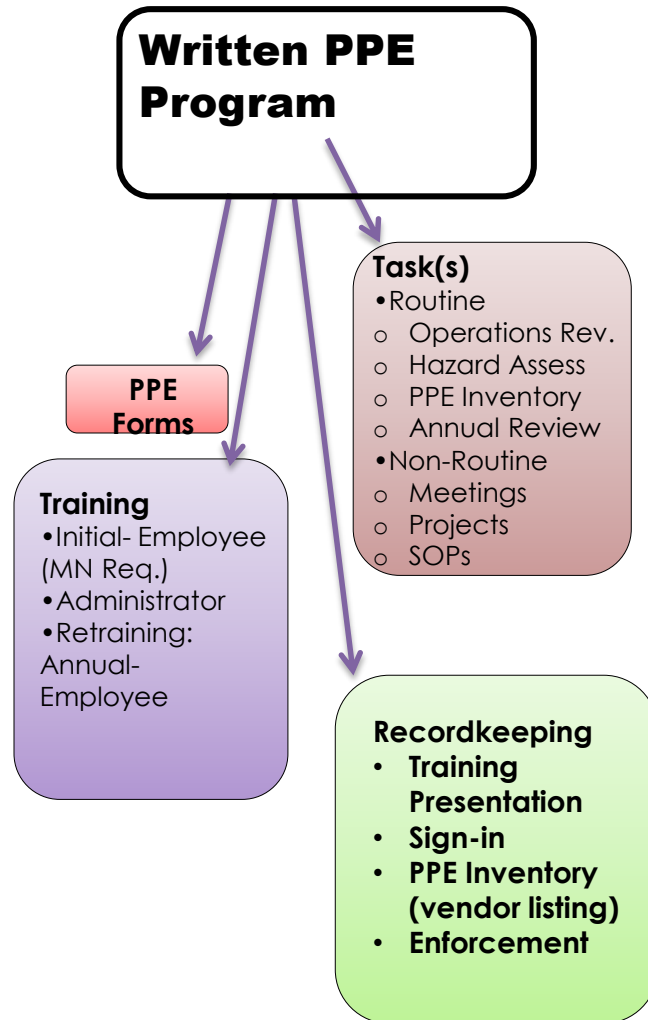


...etc.



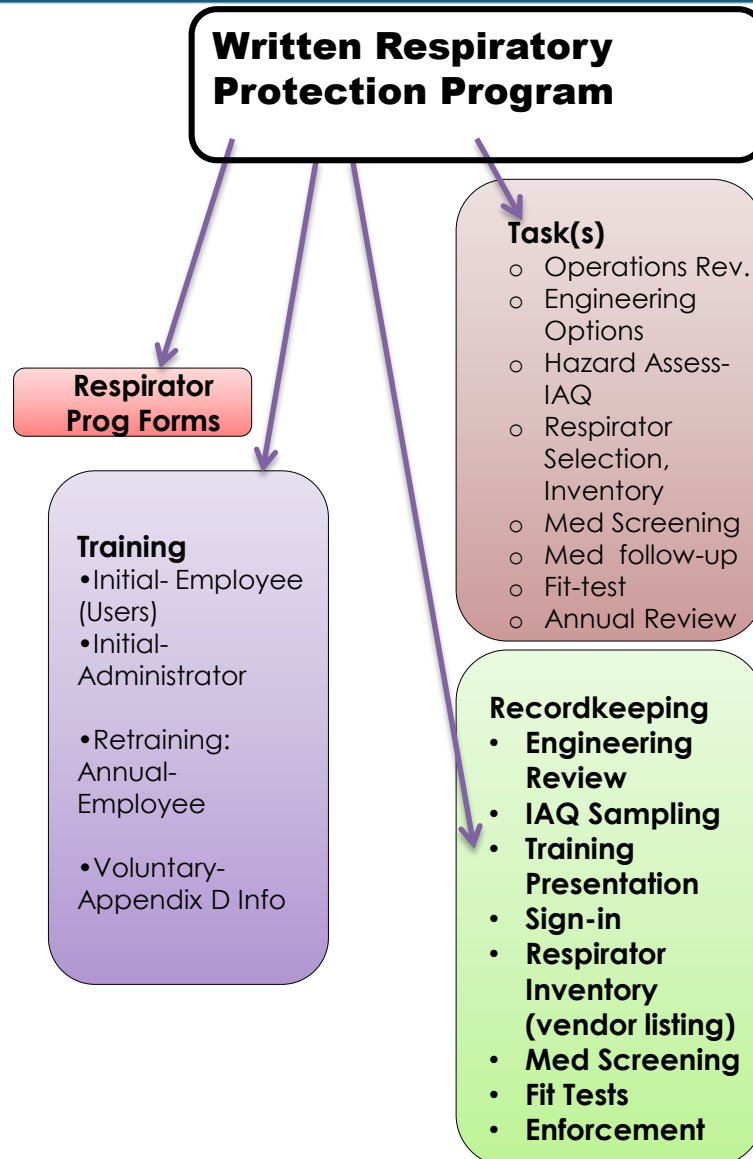
NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts



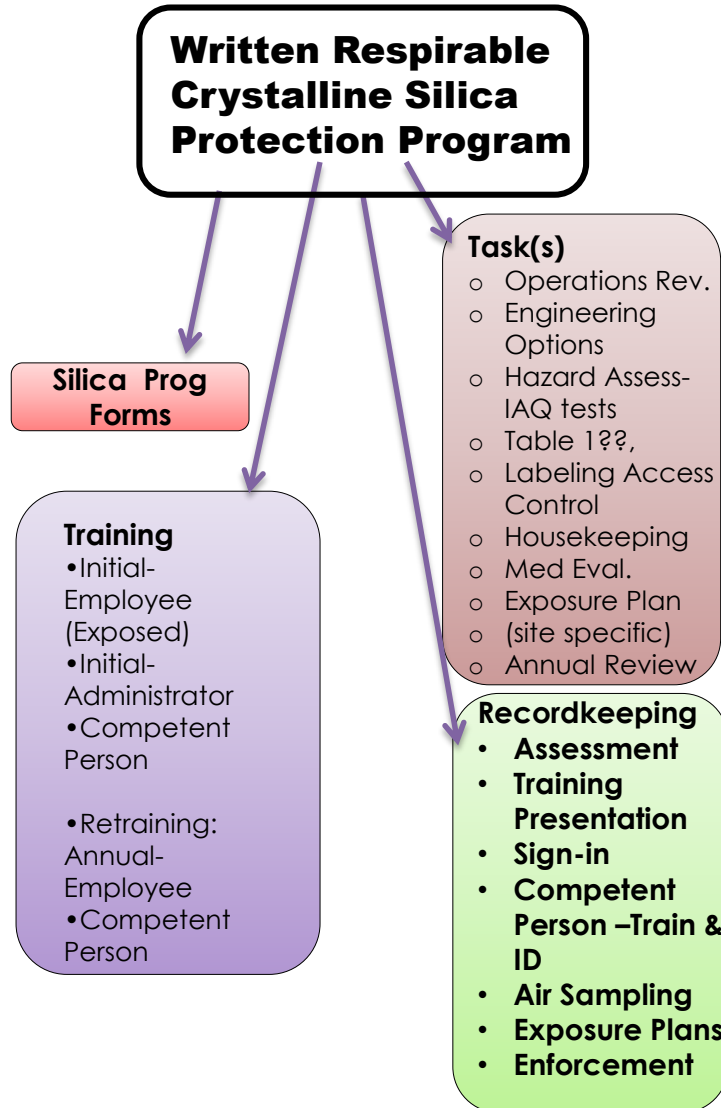
NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts



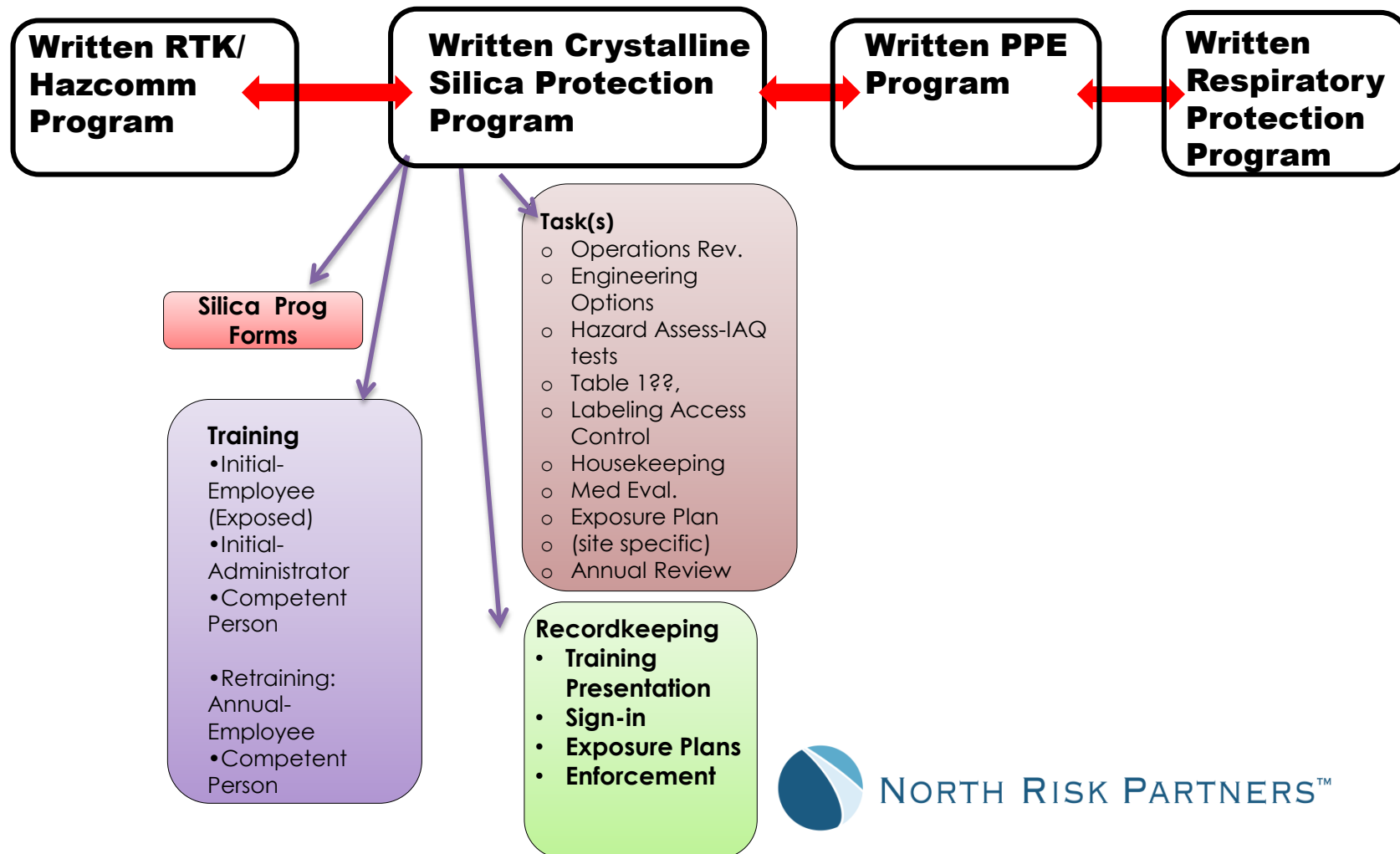
NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

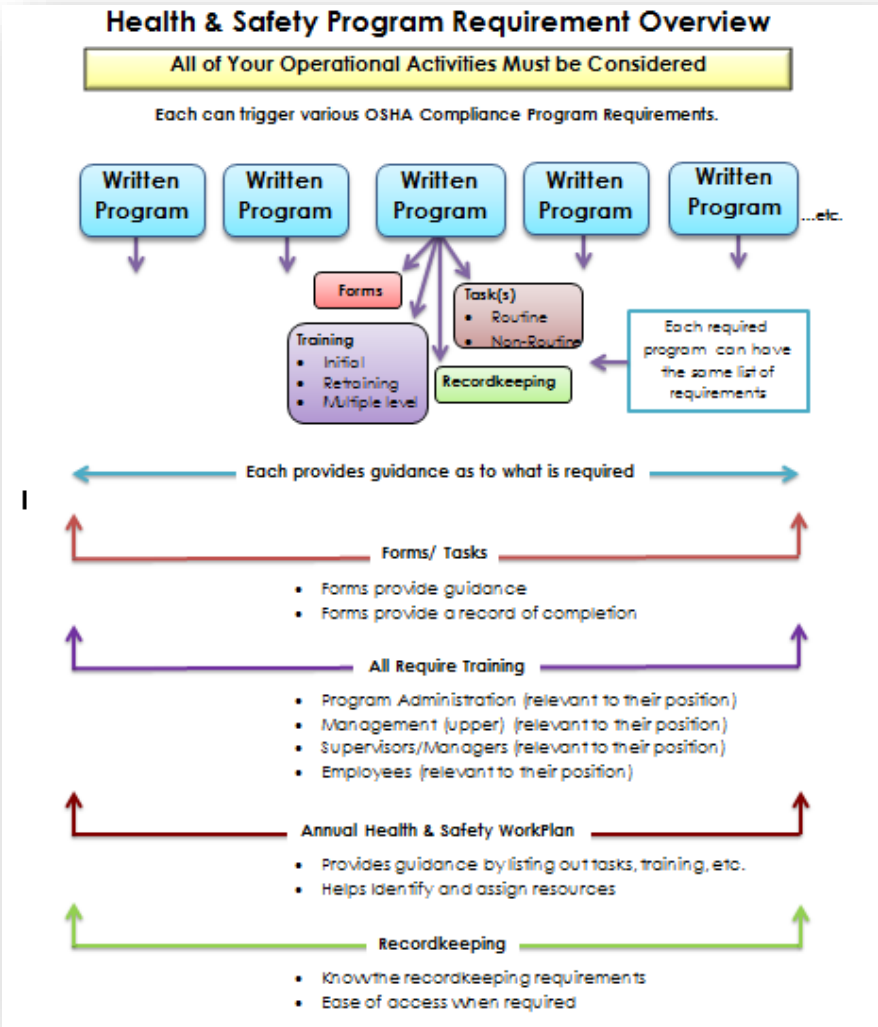
## **Sustainability is Key**

- **Your Operations May Change**
- **The Regulations or Best Practices May (and often times do) Change**
- **Team members and Roles May Change**
- **Employees May Not Be Available (vacation, illness)**



NORTH RISK PARTNERS™

# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

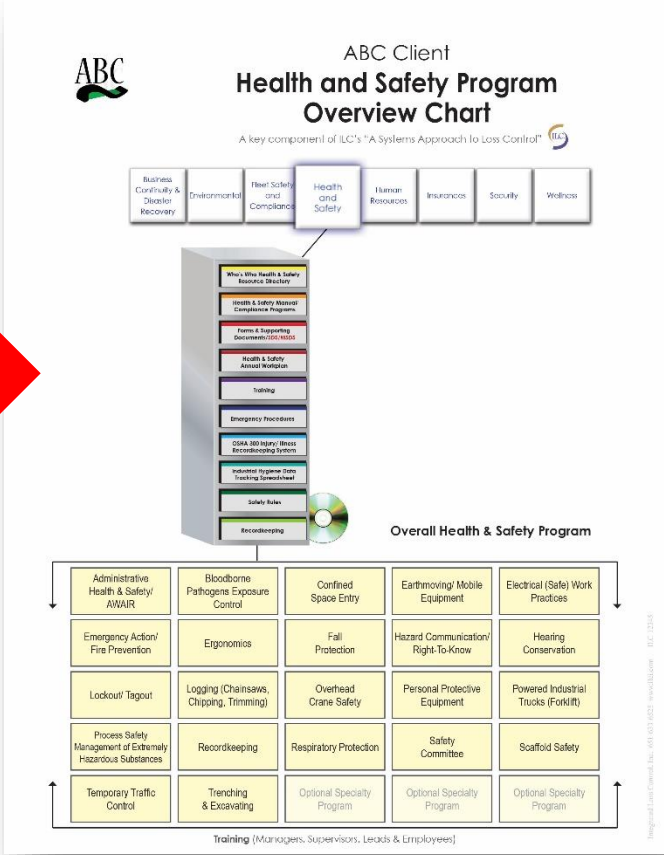
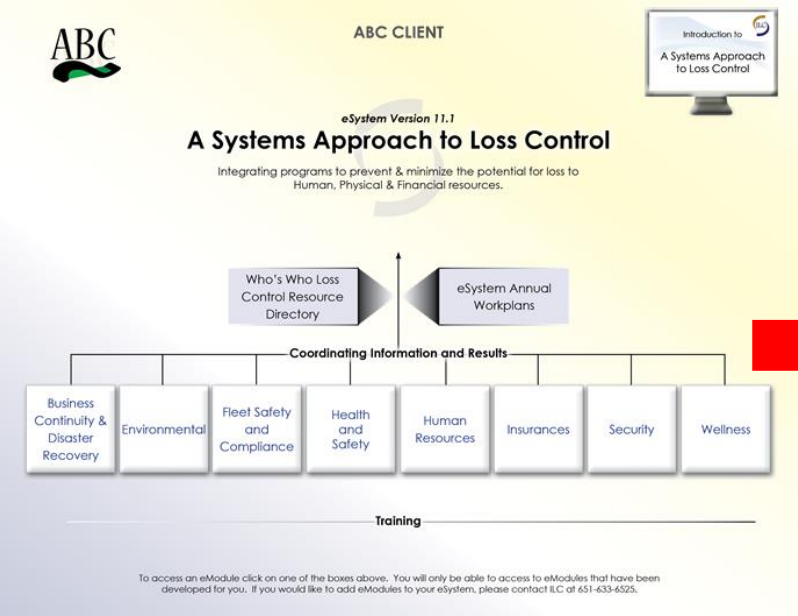


Questions???



# OSHA Compliance-Creating a Foundation for Streamlining Your Health and Safety Efforts

## ILC Has a Solution to Safety Management Systems via our eSystem:





# **North Risk Partners Value-Added Services Hotline (888) 667-4135**

Call the hotline to get personalized advice from HR and safety professionals on a variety of topics, including state and federal compliance, employer best practices, workplace programs and more.

**\*You may also reach Integrated Loss Control by emailing [safety@northriskpartners.com](mailto:safety@northriskpartners.com)**

