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From The Director

ISHM implemented a customer relations software program in order to make interaction between staff and member easier as well as make the payment process simpler.

Sadly neither of the hoped outcomes has occurred. Members had problems logging in, many company firewalls prevented receiving invoices or statements with some not even allowing connecting to the payment link.
Additionally the staff has spent many hours correcting conflicts between the CRM and our accounting software.

So overall the process resulted in more man hours expended rather than less.

As a result ISHM will be going away from the CRM starting early September. Anyone with an outstanding invoice will receive a new invoice with the new payment links.

Many thanks to those who used the member login to update contact information and make payments. If only it had worked so easily for everyone.

Our search for a suitable program will continue.

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**ISHM Safety Management Professional 2014**

Cory was instrumental in fostering the necessary relationships to develop a campus employee safety committee and developing a system-wide safety committee with monthly meetings and full participation with multi-disciplinary/classification represented. He also started recurring, quarterly brown bag training sessions covering various safety management topics and a safety month celebration, which included weekly newsletters, activities and a capstone system safety fair at the end of the month with various training, education and awareness stations set up to focus on workplace and home safety.

Cory has partnered and built relationships with not only major stakeholders, including the employee populous, within Memorial Hermann, but also with extensive stakeholders to provide advancements and developments in employee safety in an industry traditionally accepting of occupational hazards. Cory has engaged the system and its supporters and allowed for increased proactive accident prevention and decreased injuries.

**About Memorial Healthcare System**

The Memorial Hermann Healthcare System is the largest not-for-profit health system in Southeast Texas with 12 hospitals and numerous specialty programs and services throughout the Greater Houston area and has proudly served this community for more than 105 years. Memorial Hermann fully supports employee safety and health through its Occupational Health and Safety Department with its central employee safety management function and clinics in each acute care hospital; additionally, employee safety and health are developed and monitored through employee engagement and hazard identification, assessment, and controls developed by both the System-Wide Safety Committee representing all System hospitals and organizations and each hospital's individual Safety Committee and Joint Commission Environment of Care Committee. Through these efforts, Memorial Hermann supports the development and
continual improvement of high-reliability employee safety and health programs leading to safe behaviors and conditions and injury and incident reduction.

**Board of Directors Thoughts - Magdy Akladios**

**Ergonomics and Human Factors in the Workplace**

After the Sunday service, the church I go to serves a large pot of coffee, and a large pot of Tea. Both pots look exactly the same. Over a few weeks, I’ve seen coffee drinkers tapping the tea pot, and vise-versa. I have made the same mistake many times as well. We have all learned the hard way that mixing a few drops of coffee over a cup of tea (and vise-versa) makes the worst hot beverage. A quick and intelligent fix was that they started to hang a tea bag on the tea pot...Problem solved!

Most Ergonomic and Human Factors issues are relatively easy, quick, and inexpensive to fix. It only takes some ingenuity and intelligent thinking. Two sides of the same coin, ergonomics is concerned with the human as a physical engine (mostly neck down), while human factors is more related to the cognitive side (mostly neck up). In general, ergonomics and human factors are concerned with making the workplace fit the human (in terms of physicality, and understanding). The main aim is to look at the human being as an integral component of the system, hence, developing a seamless working relationship between the human (or user) and the workplace (environment, or system).

However, most workplaces put ergonomics and human factors on the back burner since it is not covered by a particular federal standard. Today the only state in the nation that was able to pass an ergonomic standard is California. Other states including Alaska, Minnesota, Oregon, and Washington currently have efforts to reduce ergonomic-related issues. Of which a few attempted to have ergonomic regulations, but were not successful.

Likewise, Federal OSHA have tried a couple times to pass an ergonomic standard, but could not. Instead, OSHA currently have Ergonomic Guidelines in specific industries. These include:

- Nursing homes;
- Retail grocery stores;
- Shipyards;
- Meatpacking;
- Poultry processing plants; and
- Beverage Distribution.
And while there is no Federal regulations governing the exposure to ergonomic issues, an OSHA officer could easily revert to the General Duty clause, under Section 5(a)(1), and cite an employer for not providing a safe and healthful workplace to his/her employees...And this includes ergonomic exposures.

As seen from the simple example presented earlier, considering ergonomics/human factors in the workplace can save employers a lot of money, reduce error, reduce time, reduce injury (or the potential thereof), and increase employee morale. This in turn will translate to higher productivity, resulting in higher profit.

Magdy Akladios, PhD, PE, CSP, CPE, CSHM

Get off the EHS Island!

Whether you work in Aviation, Mining or the Zoo Industry, the EHS Department is often caught in the middle between the C-Suite and everybody else in the company.

One of the key problems is that SH&E professionals often lack the interrelation skills necessary to effectively communicate with both groups. Your role as facilitator, interpreter, and messenger between Executives and Workers is essential to your job.

Unfortunately, many companies that claim safety is a core value, don't really mean it. It's politically correct to state this as their higher purpose and so they say that safety is a core value, when really it's just a priority. It may be a very high priority, but one whose importance moves up and down on the list depending on other factors.

When safety is just a priority, then it's going to be affected by short timelines, increased costs, decreased profits, other projects, and pressure to compete. It's not uncommon for a company's financial incentive policies that are tied to staying under budget or performance can result in being counter-productive to EHS activities. However, when safety is a core value, it instead positively impacts all decisions in other departments, including HR, Purchasing, Accounting, Production, and Marketing.

I suspect that 90 percent of the time, any random visit to a construction site or manufacturing plant would reveal at least one worker doing an unsafe act. This disconnect where workers are operating outside of company mandates, is what we must correct. Quite often this is a middle management issue and it is a golden opportunity for the EHS professional to educate the person about the financial benefits of safety.

The key disconnect for SH&E professionals is that many Executives have business or financial backgrounds, but no education in EHS disciplines. Likewise, EHS managers often lack formal business or financial training. To begin to bridge the communication gap, both parties should consider developing interdisciplinary training. When EHS managers understand the numbers, you can explain the bottom line benefits of an
effective EHS department, its programs, and policies to the C-Suite. As you build this relationship, engage Execs in the EHS process and work together to define how to achieve safety as a true core value.

Meanwhile, EHS managers must be able to be an interpreter for the worker by translating the lofty ideals set by the C-Suite into real-world scenarios that workers understand. Make sure employees know where Executive Management stands on safety.

Unfortunately, sometimes employees behave unsafely or unethically because they think they are helping the company. Show how this violates company core values and how safety is implemented in day-to-day activities. It is equally effective to demonstrate the personal impact even small safety infractions can have on the worker directly.

The EHS professional has for too long been on an island by themselves. It is time to get overt management support for programs that we know save lives while protecting property and the environment.

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**Discounts for ISHM Members**

ISHM is a supporting organization of the Crane & Rigging and Industrial Crane & Hoist Conferences (CRC/ICH), to be held Dec. 3-4, 2014 in Houston, Texas.

**ISHM members receive a $100 discount off of the registration fee when they use Code VIP100SO.**

The independent conference offers education and networking opportunities for safety and risk managers, crane and rigging supervisors, lift directors, project managers, and others responsible for managing crane and rigging operations in construction and heavy industry.

Learn more about the [agenda](#) here.
Download the [brochure](#) here.

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**Employee Oriented Safety**
Safety management systems exist to insure a sustainable methodology for organizational learning relevant to the protection of the human resource. Just like a system for calling offensive plays for a football team that allows adaption to the situation, that makes complex and multiple components interact congruently, a safety management system allows an organization to establish interaction between a safety department and the customers it serves. Employee oriented safety is a management philosophy that relies upon employee participation and grass roots led initiatives. E.O.S. utilizes partnership between safety and its customers, built upon trust and equality, which produces service. Safety then is central and surrounded by its customers. This is in stark contrast to being outside of the customers and overseeing their activity in a restrictive role like that of a regulatory agency.

Safety has many customers. Within its own organization it provides valued services to the workforce, to labor organizations, to the management, customers, to consumers of its products, vendors, and the families of workforce and managers alike. Safety has customers outside of the organization as well. Safety provides services to the surrounding community in performing its duties. The less likely a catastrophic incident becomes, the safer the community at large. First responders are also an outside customer that is affected by the performance of safety but also by partnering for emergency preparedness with activities such as conducting mock exercises.

The philosophy of safety as being a central and equal component of the organization, that partners with other components through trust, mirrors the management philosophy for police agencies entitled, community oriented policing. Rather than being on the outside of the community and looking in to oversee the pieces of the community, like neighborhoods and business communities, it looks to partner with these components and identifies needed services and provides them. For those safety professionals with a law enforcement background this is natural. The fit for the management philosophy appeals to both because from the lofty view downward, both have similar duties in different realms.

The safety management system, no matter its underlying philosophy, must be comprehensive to allow for organizations to learn from their experience. It must perform or meet 5 characteristics; it must gather relevant data, it must organize and analyze the data, it must produce countermeasures to correct deficiencies or improve upon adequacies, it must assess countermeasures for effectiveness and make adjustments, and finally it must communicate this organizationally.

Safety management standards provide guidance in achieving these characteristics. Hazard identification is central. In employee oriented safety, hazard recognition is accomplished by establishing duties at three levels of responsibility. Authorized safety associates are trained in hazard recognition and given the duties of recognizing and reporting hazards, and following safety protocol. Competent safety associates are fully trained in strategic hazard abatement, and along with authorized duties are tasked with planning or helping to plan countermeasures and enforcing safety protocol. Safety administrator level is usually reserved for safety professionals or the safety manager and is also responsible for overall program success, measuring and tracking performance, and reporting this to the organization. This philosophy for participation can be carried out in many safety initiatives such as fall protection,
Continuous improvement is foundational for sustainable management and mandated by safety management system standards. Rather than having initiatives fade from implementation before their necessity is over, practicing continual improvement can instill cultural practice. Every safety initiative should be reviewed for effectiveness as part of a good faith self-assessment plan.

Central to the success of safety is investigational accuracy. Continuous improvement must exist in investigations. The credibility with upper management and the workforce plays a vital role in success. When countermeasures are not effective credibility is lost. Over time repeated inaccuracies in causal analysis create less effective countermeasures, which lead to wasted resources. Causal analysis must involve proper application of root cause analysis and incident mapping that can help align events and conditions that culminated to the result. Techniques like butterfly mapping can allow for checking for a complete countermeasure that accounts for all factors and conditions and subsequently allows for assessment of the actual point where the investigation was weak or inaccurate.

Employee oriented safety adopts a management philosophy that comes from an unlikely source for many, police management. Regardless of underlying philosophy, safety management systems must be comprehensive in order to achieve organizational learning. Central to these systems are hazard identification and the application of continuous improvement to rate program effectiveness.

Dr. Ronald G. Dotson CSHM
Eastern Kentucky University Occupational Safety Program
Ask the Lawyer

Question: Why did OSHA issue a supplemental proposed rulemaking regarding electronic reporting of injury and illness data?

Response: OSHA published its original Notice of Proposed Rulemaking (NPRM) on November 8, 2013, in which OSHA proposed, among other things, to require employers to submit 300 logs and 301 injury reports on a quarterly basis, and 300A summaries on an annual basis. Under the proposal, employers would be required to submit the reports electronically, and the data would be available for public review. I commented on the original NPRM in the December 2013 Newsletter, a copy of which can be found here. In that newsletter, I identified a number of reasons why OSHA's proposal was problematic.

On August 14, 2014, OSHA published a supplemental NPRM on the same issue. In its supplemental NPRM, OSHA is seeking comments on the following three points:
(1) Whether employers should be required to inform their employees of their right to report injuries and illnesses;
(2) Whether employers should be required to establish injury and illness reporting requirements that are reasonable and not unduly burdensome; and
(3) Whether employers should be prohibited from taking adverse action against employees for reporting injuries and illnesses.

OSHA stated that a number of commenters to the original NPRM expressed concern that some employers may underreport injuries because the data will be made publicly available. In an attempt to guard against that possibility, OSHA is seeking comments whether to adopt these control measures.

In my opinion, OSHA is focusing on the wrong issue in the supplemental NPRM. The original NPRM is not problematic because some employers may underreport injuries and illnesses. Rather, it is problematic because it requires employers to submit confidential and sensitive employee information, imposes an unreasonable burden on employers, focuses on lagging rather than leading indicators, and can be easily misinterpreted (especially since the data will be publicly available), among other things. Hopefully OSHA will recognize these flaws before it issues a final rule.

Darren Hunter is a partner and an experienced OSHA practitioner in the Chicago law firm of Rooney Rippie & Ratnaswamy LLP. This column does not constitute legal advice or the formation or proposal of an attorney-client relationship to or with any person or entity. In addition, this column should not be understood to represent the views of ISHM, the law firm, the individual attorneys at the firm, or of any of the firm's clients or former clients.
Looking for an individual interested in working the Atlanta area who has strong knowledge and experience in crane operations and safety.

We are looking to fulfill a year long position that has growth opportunities beyond the one year.

Crane Coordinator to work on a large-project construction site, in the Atlanta area. Normal hours will be Monday through Friday btw the hours of 7:00 am and 4:00 pm. Some overtime to be expected. Responsibilities include coordination of all Mobile Cranes on the job site. Individual crane tasks will be at the direction of Crane Industry Services, LLC, (CIS) the lead contractor and/or Crane Owner/User Superintendents for their respective contracted work. The coordinator will be responsible for weekly tool box talks with crane operators, ensuring equipment and rigging gear inspections are being completed and documented as required, site/ground condition inspections, review of lift plans, personnel qualification verification and general compliance with OSHA Subpart CC Regulations, ASME B30.5 and ASME P30.1 Industry Standards. CIS will support the Coordinator with tool box talk content and serve as an advisor to asset the Coordinator when questions arise. Crane inspections, personnel training, qualifications and certifications will be handled separately. However, having knowledge or credentials as a trainer, inspector or examiner are assets for this role.

The Crane Coordinator must be experienced and knowledgeable about crane safety, operations, load charts, safe set up and lifting requirements. The Crane Coordinator will not be responsible for lift plans but will be responsible for making sure crews follow plans correctly, set up and operate in a safe manner. The Coordinator must also oversee safe rigging practices and personnel's ability to fulfill. The Coordinator will be a central point of communication to CIS and lead contractor. The Coordinator ideally will have five or more years experience, training and other credentials to validate qualification crane and rigging supervisory expertise.

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