From the Director

ISHM will have a booth at the NSC Conference and Expo in late September. The annual in-person board meeting will be held on September 27 in Atlanta, you are welcome to attend. Let us know. At the board meeting we will announce the ISHM Safety Management Professional of the Year.

This edition of the newsletter, in addition to the board member article and of course "Ask the Lawyer", contains information found in various trade publications that we thought would be of interest.

Larry
Essential Elements for a Successful Written Workplace Safety and Health Program
By Jan Rosenberg

Although complying with OSHA's rules and regulations are important in creating and maintaining a safe and healthy workplace, there are some very basic elements of a written program that must be implemented into a safety and health management system to assure workers are protected. Such a written program will make sure that there is clear communication to all employees and thus consistent application of the program elements.

Read the article

From the Lawyer - Darren Hunter

Question: Why do the public comment periods for OSHA rulemakings keep getting extended?

Response: The procedures for the promulgation of new rules are set forth in Part 1911 of the Occupational Safety and Health Administration's (OSHA) regulations. Under Part 1911, OSHA must set at least 30 days as the minimum comment period for rulemakings. OSHA may hold an informal hearing on the rulemaking no earlier than 10 days after the public comment period closes.

OSHA has discretion to extend the public comment period if circumstances warrant. Usually, one or more interested parties will file a request with OSHA to extend the comment period. In these requests, the interested parties will identify all the reasons why an extension is warranted. For example, the proposed rule may be complex and, therefore, it may take additional time for the interested parties to compile data and statistics on the technical feasibility and economic reasonableness of the rule. One example in which the public comment period was extended was the crystalline silica rulemaking. In that case, numerous parties requested extensions because of the complexity of the rule and the high cost to industry, and OSHA granted those requests. To be fair, however, OSHA does not always extend the public comment period for rulemakings.

Darren Hunter is a partner and an experienced OSHA practitioner in the Chicago law firm of
This is a fascinating article that appeared in the University of Chicago Magazine. Who knew all that was going on in our bodies.

**Microbial me**

**BY LYDIA LYLE GIBSON |**

**THE UNIVERSITY OF CHICAGO MAGAZINE- JULY-AUG/15**

Scientists are discovering how microbes not only make us sick but also keep our bodies working.

[Read the Article]

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This article appeared in a recent edition of "Security Magazine"

16000 Threats a day?????
We all need to learn how to de-escalate a situation

12 Methods to De-Escalate Violent Situations
Every day, says Jim Sawyer, CHS-III, CPP, CHPA, Director of Security Services for Seattle Children's Hospital, there are
16,000 threats of workplace violence. Sawyer is a crime prevention and personal safety presenter, a nonviolent crisis intervention certified instructor, a member and presenter with Homeland Security, and a president and past president with the Washington State Crime Prevention Association.

Read the Article

Behavior Based Safety

We have long been critical of BBS, not the process itself but the way it has been sold and implemented in many organizations. Do it wrong and it creates a larger mess then what it was intended to fix. This article by Dr. Clair Williams which appeared in a recent edition of "ISHN" could help sort out some of the issues holding BBS back. Larry Curtis, ISHM

Two years ago, I co-authored an article with Margaret Hanson in SHP magazine about behavior change in a health and safety context (Just one more thing, SHP, July 2013). In the article, we discussed one model in particular - the COM-B (1) - which we liked for its elegance and simplicity and which we valued for the research base from which it is drawn. The model is the central core of the Behavior Change Wheel (BCW) (1) which will be discussed later in this run of articles.

More BBS
California employers' workers' compensation insurance premiums jumped by $2 billion in 2014

In the last two years, the majority of states have seen an increase in the total amount of paid workers' compensation benefits. This increase is concerning and OSHA hopes to work with employers to help greatly reduce such claims. For this reason, I am reaching out to see if you would be interested in sharing this infographic created by Eastern Kentucky University's Bachelor of Science in Occupational Safety program. This visual explains the most dangerous industries in the U.S. and the substantial increase in workers' compensation benefits.

Go to the infographic