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From the Director

WOW did 2014 fly by quickly!! We were very busy in the office dealing with issues and challenges and more importantly striving to provide ever improving customer service. Our attempt to implement a CRM was a notable failure, the program was not meant for a certification organization and no amount of 'tweaking' would get it working correctly. Thank you for your patience during the trial.

We are looking forward to an exciting 2015. We have a lofty goal of increasing the number of ISHM certificants by 50 percent. In order to do this we will certainly need
your support and assistance.

1. If you are going to be giving presentations to groups we will offer you an ISHM logo shirt if you give us at least three weeks' notice we can also provide handouts and brochures to distribute

2. If you refer one person who successfully completes the application process we will give you an ISHM logo shirt or $25.00 off your renewal fee.

3. If you refer three people who successfully complete the application process we will give you a Kindle Fire HD or one year renewal fee. (only one per year)

   (Cannot combine awards)

   **Use this Form**

Additionally ISHM has developed a clip for YouTube which can assist as you in explaining what ISHM is all about. Please share this with someone you think would benefit from our certifications. [ISHM on YouTube](#)

4. We continue to notice that companies often mandate a CSP for positions available. When you come across that please be proactive and try to get the company to understand that there are better options for EHS management certifications.

5. We will be attending several trade shows this year, hopefully if one is in your area you will be able to assist in meeting prospective ISHM folks at our booth

   If you have, or would like to author, an article on EHS management we would like to consider it for inclusion in an edition of the monthly newsletter. Please forward the article to me, we will have it reviewed and once approved include it in a coming newsletter.

   Stay tuned throughout 2015 for announcements about formal relationships established with well-known safety organizations throughout the world. We in are in negotiations with several.

   We applied for recognition from the state of Pennsylvania to have the CSHM
recognized as an approved accident and illness prevention provider. We have been approved!!! The CSHM will be added to all PA accident and illness prevention provider's lists and records will be revised to reflect this approval.

If you have ideas that can help ISHM grow please share with us. As always please contact us with any issues you may have.

HAPPY NEW YEAR

Life inside a Rubik’s Cube

Cory Worden, CSHM, CSP, CHSP, REM, CESCO

Here we are, 44 years since the OSH Act was passed, still seeking the best ways to not only control hazards, but to affect culture change so that individual leaders and workers want to do so. I've been told by employers over the years that it's not my job to lead, manage, or make decisions, but to persuade and convince other leaders that safety is 'the way to go,' as if there's some other choice, as if they haven't already made up their mind to bypass safety and they're simply buying time until an accident happens, at which time they'll promptly claim that I 'didn't keep them safe.' I've been told that 'noncompliance is always an option.' I've even seen individual workers argue with me at their own detriment that I should let them work unsafely, as if I'm taking what's rightfully theirs, the right to injure, expose, or even kill themselves on the job. Yet, I continually get up every day (provided I actually slept) and work the Rubik's Cube that is the pursuit of a safety culture.
Question: How long are employers required to maintain injury and illness records?

Response: Under section 1904.33 of the OSHA regulations, employers are required to maintain the 300 injury log, 300-A annual summary and 301 incident form for at least five years after the calendar year that the records cover. If there is newly discovered evidence of a recordable injury during the five-year period, the employer is required to update the 300 log, but is not required to update the 300-A annual summary or 301 incident report. OSHA has the right to request these records during inspections of the workplace.

Notably, even though the employer is required to maintain injury and illness records for at least five years, and even though OSHA may be entitled to obtain copies of the employer’s records over the five-year period, OSHA is only permitted to issue a citation to employers for violations of the recordkeeping rules over the previous six months. OSHA cannot issue a citation after six months have passed following the occurrence of a recordkeeping violation. The six-month statute of limitations is set forth in section 9(c) of the Occupational Safety and Health Act.

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G.M.'s CEO is the latest executive to see the light

By Dave Johnson

July 9, 2014

Dave is the editor of ISHN Newsmag and an at large member of the ISHM Board of Directors


Nothing against Ms. Barra. I'm sure she is sincere and determined in making her pledge. But I just shook my head when I saw this little "sidebar" box and the headline. Once again, we are treated to a CEO committing to safety after disaster strikes, innocent people are killed (so far G.M. has tied 13 deaths and 54 accidents to the defective ignition switch), and a corporation's reputation is dragged through the media mud. The caption of Ms. Barra's pic says it all: "...Mary T. Barra told shareholders that the company was making major changes after an investigation of its recall of defective small cars."

Why do the commitments, the pledges and the changes come down from on high almost invariably after the fact?

You can talk all you want about the need to be proactive about safety, and safety experts have done just that for 20 or 30 or more years. Where has it gotten us, or more precisely, what impact has it had on the corporate world?

Talk all you want

Talk all you want about senior leaders of corporations needing to take an active leadership role in safety. Again, safety experts have lectured and written articles and books about safety leadership for decades. Sorry, but I can't conjure the picture of most execs reading safety periodical articles and books. I know top organization leaders have stressful jobs with all sorts of pressures and competing demands. But I have a hard time picturing a CEO carving out reading time for a safety book in the evening. Indeed a few exist; former Alcoa CEO Paul O'Neill is the shining example. But
they are the exceptions that prove the rule. The National Safety Council's Campbell Institute of world class safety organizations and CEOs who "get it" are the exceptions, too, I'd assert.

And what is the rule? As a rule, proven again and again ad nauseam, top leaders of large corporations only really get into safety when they're forced into a reactive mode. For the sake of share price and investor confidence, they speak out to clean up a reputational mess brought about by a widely publicized safety tragedy. Two space shuttles explode. Refineries blow up. Mines cave in. The incident doesn't have to involve multiple fatalities and damning press coverage. I've talked with and listen to more than one plant manager or senior organization leader forced to make that terrible phone call to the family of a worker killed on the job, and who attended the funeral. The same declaration is stressed time and again: "Never again. Never again am I going to be put in the position of going through that emotional trauma. Business school never prepared me for that."

"In her speech to shareholders, Ms. Barra apologized again to accident victims and their families, and vowed to improve the company's commitment to safety," reported The New York Times. "Nothing is more important than the safety of our customers," she said. "Absolutely nothing."

Oh really? What about the safety of G.M.'s workers? Oh yes, it's customers who drive sales and profits, not line workers. This is cold business reality. Who did G.M.'s CEO want to get her safety message across to? She spoke at G.M.'s annual shareholder meeting in Detroit. Shareholders' confidence needed shoring up. So you have the tough talk, the very infrequent public talk, about safety.

Preaching to the choir

I've just returned from the American Society of Safety Engineers annual professional development conference in Orlando. There was a raft of talks on safety leadership, what senior leaders can and should do to get actively involved in safety. There were presentations on the competitive edge safety can give companies. If an operation is run safely, there are fewer absences, better morale, good teamwork, workers watching out for each other, cohesiveness, strong productivity and quality and brand reputations. The classic counter-argument to the business case was also made: safety is an ethical and moral imperative, pure and simple.

But who's listening to this sound advice and so-called thought leadership? As NIOSH
Director Dr. John Howard pointed out in his talk, the ASSE audience, as with any safety conference audience, consists of the true believers who need no convincing. How many MBAs are in the audience?

Too often the moral high ground is swamped by the short-term, quarter-by-quarter financials that CEOs live or die by. Chalk it up to human nature, perhaps. Superior safety performance, as BST's CEO Colin Duncan said at ASSE, results in nil outcomes. Nothing happens. CEOs are not educated to give thought and energy to outcomes that amount to nothing. So safety is invisible on corner office radar screens until a shock outcome does surface. Then come the regrets, the "if only I had known," the internal investigation, the blunt, critical findings, the mea culpas, the "never again," the pledge, the commitment, the vow, the tough talk.

There's that saying, "Those who do not learn from history are bound to repeat it." Sadly, and to me infuriatingly, a long history of safety tragedies has not proven to be much of a learning experience for many corporate leaders. "Ah, that won't happen to us. Our (injury) numbers are far above average." Still, you won't have to wait long for the next safety apology to come out of mahogany row. It's a pathetic ritual endlessly recycled.

New Year, New OSHA Reporting Requirements

On September 18, 2014, OSHA published a final rule updating its Injury and Illness Recording and Reporting regulation that will go into effect on January 1, 2015, for establishments located in states under federal OSHA jurisdiction. (Note: Establishments in states that operate their own safety and health programs should check with their state plans for their implementation dates.) The new rule revises the requirements for reporting work-related fatality, injury, and illness information to OSHA. The new rule also updates the list of industries that are partially exempt from requirements to keep records of work-related injuries and illnesses based on relatively low occupational injury and illness rates.

The current regulation requires all employers (even those exempt from routinely keeping OSHA injury and illness records due to company size or industry) to report
work-related fatalities and in-patient hospitalizations of three or more employees within eight hours of the event. The new final rule retains the requirement for all employers to report work-related fatalities to OSHA within eight hours of the event, but amends the regulation to require employers to report all work-related in-patient hospitalizations, even if only one employee is hospitalized, as well as all amputations and losses of an eye, to OSHA within 24 hours of the event. An "amputation" is defined as the traumatic loss of a limb or other external body part, such as a limb or appendage that has been severed, cut off, completely amputated, or partially amputated; fingertip amputation with or without bone loss; medical amputation resulting from irreparable damage; and amputation of a body part that has since been reattached.

Under the new requirements, the report may be made to OSHA by:

Calling OSHA's toll-free number at 800-321-OSHA;

Calling the OSHA Area Office closest to where the event occurred during normal business hours; or

Using the new online reporting form that will be available soon on OSHA's public website (www.osha.gov).

Although all employers are required to report fatalities, in-patient hospitalizations, amputations, and losses of an eye, there are two classes of employers that are partially exempt from routinely keeping injury and illness records (i.e., exempt from maintaining the OSHA 300, 300A, and 301 forms unless asked to do so by OSHA or the Bureau of Labor Statistics or "BLS") by reason of company size or industry classification. The new final rule maintains the current exemption for employers with 10 or fewer employees at all times during the previous calendar year. However, the new final rule revises the list of low-hazard industries in which establishments are partially exempt from routinely keeping the records.

The current list of partially exempt industries was based on the old Standard Industrial Classification (SIC) system and injury and illness data from the BLS from 1996 - 1998. The new list of partially exempt industries in the new final rule is based on the North American Industry Classification System (NAICS) and injury and illness data from the BLS from 2007 - 2009. The new list of partially exempt industries is available on the OSHA website at https://www.osha.gov/recordkeeping/ppt1/RK1exempttable.html. Employers should note that the new list includes 25 industries that have establishments that will be
newly required to keep records under the new final rule.

Information on the new rule, including an overview of the changes, the final rule as printed in the Federal Register, fact sheets, frequently asked questions, and compliance assistance, is available on the OSHA website at https://www.osha.gov/recordkeeping2014/records.html.

You can keep up with regulations online at www.regs2go.com! Complete with links to Letters of Interpretation, showing recent changes, and the most clear navigation in regulations,

regs2go.com is being offered to the first 200 ISHM members for free! Just scan the QR code below or visit www.regs2go.com/start and enter the code SHARE-ISHM for a complimentary copy of the July 2014 edition 1910 General Industry regulations.

POSITIONS AVAILABLE

NOTE: This position mentions CSP BUT the CSHM is also accepted!!!!

http://www.memorialhermann.org/mh_forms/careerframe.aspx?path=atsjb06.jsp&jobeqno=100034582
Memorial Hermann Katy Hospital seeks a Safety Coordinator.

Must have a minimum of 2 years experience developing and implementing safety programs and policies.

The Safety Coordinator I position reporting to the System Safety Manager will provide professional knowledge and expertise in the day to day operations and support of environmental health and safety programs in compliance with regulatory agency guidelines and system policies at the assigned facility. The incumbent will be responsible for analyzing and overseeing occupational health and safety programs, investigate and inspect safety compliance issues by identifying issues and providing hazard analysis and assessments determine where process changes can be made that might impact cost, communication or training needs.

The Safety Coordinator will be responsible in coordinating and implementing of policies and procedures to ensure a safe and health working environment.

1. Education: Associate's degree in Safety or related field required. Bachelor's degree in Safety or related field preferred but not required
2. Experience: must have two (2) + years experience developing and implementing safety programs and policies. If less than two (2), if engaged in a formal internship (structured learning activities and academic credit earned) where safety was at least 50% of the concentration will be considered.
3. Licenses/Certifications: any of the following: Certified Safety Professional (CSP) certification Risk Management (ARM), Certified Risk Manager (CRM) and/or Associate Safety Professional (ASP) or be able to obtain within two (2) years of employment.
4. Knowledge of local and basic content of applicable regulations including health, safety, and environmental government regulations.
5. Knowledge of regulatory requirements and institutional policies concerning hazardous materials, occupational safety, chemical, biological, and radioactive materials.
6. Effective oral and written communication skills. Competent presentation skills to effectively participate in and lead presentations and training sessions for employees at all levels.
7. Intermediate proficiency in Microsoft Office software: Word, Excel, PowerPoint and SharePoint
8. Demonstrates commitment to the Partners-in-Caring process by integrating our
culture in all internal and external customer interactions; delivers on our brand promise of "we advance health" through innovation, accountability, empowerment, collaboration, compassion and results while ensuring one Memorial Hermann.

**American Mechanical Services - Corporate Safety Director**

AMS is a privately owned family of companies providing primarily commercial heating, ventilation and air conditioning (HVAC) service and construction work in various locations across the country, including the greater Washington, D.C. area, Maryland, Virginia, Indianapolis, Dallas, Houston, Denver, Colorado Springs, San Diego, and the greater Los Angeles area. AMS specializes in high-quality HVAC maintenance and services work on mechanical building systems and in complex construction and repair projects involving the renovation and retrofittting of older and occupied structures, both public and private. Having been in business for more than 30 years, AMS collectively has decades of unparalleled experience to solve any HVAC needs.

AMS is currently looking for a Corporate Safety Director who will be responsible for the management, development and implementation of all Safety Policies and Procedures nationally. The Corporate Safety Director is ultimately responsible for having an effective workplace safety program and culture in place in each location in compliance with each state and federal jurisdiction. This position directs the resources and activities of the organizations to support the Health and Safety programs by providing advice and guidance to company management and senior management, and has significant influence on the company's overall performance in the areas of corporate Health and Safety, revenue protection and expense management. Provide overall leadership, professional knowledge and expertise in the administration and support of Health and Safety processes for all aspects to include regulatory agency compliance, and human resources development. The position also assists in managing claims, working with third-party administrators and vendors, managing the maintenance and purchase of the company's fleet, and conducting accident investigations of all kinds for the company. The position reports directly to the CFO.

General duties include, but are not limited to:

- Develop and provide technical and administrative direction on all Safety and
Health policies and programs, which bear critical importance to overall corporate objectives, operations and profitability of all locations.

- Oversee and enforce compliance with all state and federal regulations pertaining to company operations while maintaining awareness of any amendments and make recommendations for their implementation.
- Develop, implement and manage the overall Safety and Health policies and programs to ensure compliance with current and future legal, regulatory, and corporate requirements, to defend and protect against future liabilities.

**Director of Safety and Health**

The Director of Safety and Health is a resource that will support the Project Teams and Upper Management. The Safety Director reports directly to the Company President and Corporate Safety Director. The Certified Safety Professional (CSP) designation is preferred.

The following is a partial list of the primary tasks of the Director of Safety and Health:

1. Assist in the management and administration of the company's safety and health program.
2. Assist and support all levels of field management in establishing and maintaining an effective safety and health program.
3. Provide educational training materials designed to develop and maintain an effective safety and health program.
4. Provide technical assistance and advice to field personnel as needed.
5. Represent Hensel Phelps in all dealings with OSHA for the payment or contest of such citations.
6. Coordinate the Insurance Company's Loss Control Engineer's project visit.
7. Conduct jobsite visits to the field to assist the project team in recognizing, evaluating and controlling safety and/or industrial hygiene issues.
8. Assist in the investigation of serious accidents.
9. Represent the District in regional, national and international safety and health activities when necessary.

10. Setup and monitor of jobsite clinics.

11. Oversee workers compensation claims.


13. Recruiting of safety interns and new hires.

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