

# INFORMATION MEMO Safety Committees for Cities

Learn city obligations under state and federal Occupational Safety and Health Administration (OSHA) standards and how to meet them. Understand how to develop an employee health and safety committee, conduct self-inspections, and create job hazard analyses. Learn also about conducting effective employee accident investigations and what to maintain for OSHA and workers' compensation insurance records.

#### **RELEVANT LINKS:**

U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), Employer Responsibilities.

Minn. Stat. § 182.653.

"An Employer's Guide to Developing a Workplace Accident and Injury Reduction (AWAIR) Program", Minnesota Dept. of Labor and Industry, Occupational Safety and Health Division, Sept. 2016.

# I. Employee safety

Under the United States Department of Labor employers have an obligation to keep their employees safe and to meet state and federal Occupational Safety and Health Administration (OSHA) standards. As such, city councilmembers as well as staff must ensure budgets reflect required safety training for employees, the provision of PPE (Personal Protective Equipment) when indicated, the purchase of equipment and funding for changes to processes, and the maintenance of work environments that will reduce or eliminate hazards. There are several specific OSHA standards that address hazards typical of municipal operations such as trenching, logging, noise, lock-out/tag-out, bloodborne pathogens, etc. And there are two important overarching "performance standards" that include both the requirement "to establish and administer a joint labor-management safety and health committee" and the requirement to create an AWAIR (A Workplace Accident and Injury Reduction) Program.

According to OSHA, "Standard' means a standard which requires conditions, or the adoption or use of one or more practices, means, methods, operations, or processes, reasonably necessary or appropriate to provide safe or healthful employment and places of employment.

Some OSHA standards tell you exactly what to do, such as the Bloodborne Pathogens Standard. Others are "performance" standards. Along with some specifics, OSHA performance standards identify a required/expected outcome; in this instance, Minnesota OSHA has interpreted this to mean the purpose of the safety committee is to get management and labor together to work on improving the safety and health environment of the workplace.

This material is provided as general information and is not a substitute for legal advice. Consult your attorney for advice concerning specific situations.

Minn. Stat. § 182.653, subd. 8.

Minnesota OSHA further interprets that when a standard is performancebased, the employer can choose the method(s) on how they will comply with the standard. As an example, the AWAIR statute requires employers to develop a written safety program that at a minimum includes the five components listed in the statute. It doesn't define specifically how the employer will implement each component—that's the performance-based aspect of the rule.

# II. Labor/management safety committee

A safety and health committee is a group that aids and advises both management and employees about matters of safety and health pertaining to plant or company operation. In addition, it performs essential monitoring, educational, investigative, and creative tasks.

# A. OSHA standards that apply

Both the AWAIR Standard and the Labor/Management Safety Committee Standard spell out certain performance requirements. Having two separate standards addressing elements of the same topic might cause a bit of confusion for an employer.

While these performance standards don't entirely specify how to implement an AWAIR or safety committee program, certain portions of the standards are required. When OSHA uses the words shall, must, and will, you don't have a choice but to comply.

On the one hand, MN OSHA gives specific direction about how this committee is formed, how it will function, and the tasks this group must accomplish with statements such as the following:

- Employee representatives on safety and health committees shall be selected by...
- The safety and health committee shall establish a system...
- The safety and health committee shall review and make recommendation...
- The safety and health committee shall review incidents...
- Management shall review all safety concerns brought forward...
- Top management shall review the AWAIR Program...

On the other hand, there is some leeway in the structure of the committee; the caveat being the committee is effective in reaching the organization's overall safety program elements and goals.

Minn. Stat. § 182.676.

HRbenefits@lmc.org 800.925.1122 651.281.1200

#### Minn. Stat. § 182.676(b).

U.S. Dept. of Labor, Bureau of Labor Statistics, How to Compute a Firm's Incidence Rate for Safety Management.

U.S. Dept. of Labor, Bureau of Labor Statistics, Incidence Rate Calculator and Comparison Tool.

LMCIT Loss Control Consultant Services. See also, Section IV, *Measurements*, below. State law requires all employers with more than 25 employees to establish a joint labor-management safety and health committee for their workplace. People in small municipal operations might think this automatically excludes their city/entity from the requirement. However, when counting "employees" it's important to include in the count all the volunteer firefighters, police volunteers, and other volunteers that are considered city employees for purposes of workers' compensation benefits. Contact the League of Minnesota Cities (LMC) for help regarding this designation. That factor often means smaller Minnesota cities reach the threshold and need a committee.

Alternative criteria apply to employers with less than 25 employees. These employers must have a safety committee if they have a high lostworkday incidence rate—in the top 25 percent of premium rates for all classes.

The United States Department of Labor-Bureau of Labor Statistics has an easy-to-use online calculator. This calculator will also allow the city to benchmark its injury incidence rates to "Local Government, Minnesota." Your city's loss control consultant can also assist you in calculating this rate.

It is also important to know the safety committee's work must encompass the entire municipal operations, be those community centers, liquor stores, parking lots, office areas, or various outbuildings where employees perform work for the city.

In a small city one committee member might, for example, represent the interest of two or three departments. A large city might have subcommittees focused on specific department goals along with a central safety committee focused on the organization's overall safety needs and goals. The structure of a small city/entity committee might be quite different than the structure of a large city's even if each city has the same goal. For example, a safety goal both large and small cities might have is to reduce slip/trip/fall injuries in the organization.

Smaller cities/entities generally have much fewer injuries as compared to larger cities/entities, so their injury trends might be harder to spot. Department offices might co-exist side-by-side and share common entrances, hallways, parking lots, or other spaces. A small city safety committee might look at the various causes of slip/trip/fall incidents in general, and committee members, perhaps one representing public safety (police and fire) and one representing utility, public works, and parks, might lead a discussion about footwear, walking and working surfaces, and snow and ice removal around employee entrances and the parking lot.

Conversely, larger cities generally have more injuries, and an analysis of injuries by department might show some clear trends in terms of cause of injury. Departments are likely in separate buildings with separate entrances, parking lots, and office spaces, as well as have more complex spaces such as use-of-force training rooms and water and wastewater treatment plants. A large city with a central safety committee and subcommittees representing large department groups might also have reducing slip/trip/fall injuries as an organization safety goal. Subcommittees by departments generally work independently on cause of injury trends, etc. in their respective environments. A representative of these large departments then participates in a centralized safety committee where all departments bring forward solutions to reduce slip/trip/fall injuries.

MN OSHA Consultation talks of the benefits of a centralized committee for a large city/entity. Take a safety issue such as violence in the work environment. This has long been a safety priority with MN OSHA and events such as shootings at city council meetings highlight the need for collaboration between departments. So, if the city utility is going to shut off services at a residence or a business, then it would be good to let the employees at city hall and in the police department know about it. This is simple to accomplish in a small city, as work areas and employees are in close proximity. In a larger city, communication can be a little more difficult, as separate departments may not be in close proximity and are more likely to work in relative isolation.

# B. Committee membership

The Labor/Management Safety Committee Standard lays out the makeup of the safety committee membership. The employer, in this case the city manager or administrator, determines the size and structure of the committee(s) and seeks volunteers from the management-level members. In a large city, this could include management members for the central safety committee as well as management at the department-level subcommittees. In the absence of volunteers, the city manager/administrator appoints management-level members. These members might be department heads or middle management according to the city's/entity's needs.

If a collective bargaining agreement is in place, then the union representatives will select their employee committee membership. In the absence of a collective bargaining unit the employees select their volunteer representatives. Again, in the absence of volunteers the employer appoints members.

Minn. R. 5208.0030.

The number of employee representatives on a safety and health committee shall equal or exceed (try to exceed at least by one) the number of management representatives on the committee. Most workers' compensation injuries in the League of Minnesota Cities Insurance Trust (LMCIT) member program come from the operations level, including departments such as police, public works, and fire. Only about 3 percent of injuries are in clerical or administrative operations with another 1 percent coming from "general" municipal employees. This loss pattern is reflective of other industries in that office workers have a lower exposure to hazards that would cause an injury. To address typical loss patterns, MN OSHA requires "front line" employees be well represented on the safety committee.

Serving on the safety committee is considered part of an employee's job (unless a collective bargaining agreement determines otherwise), and time spent on safety committee work and at meetings is considered as time worked.

# C. League of Minnesota Cities Regional Safety Groups

Minnesota OSHA also allows alternative forms of a safety committee that is innovative or different in form or function if it "has substantial employee involvement and satisfies the intent of Minnesota Statutes, section 182.676." One common barrier facing small cities with just a few public works or administrative employees is the necessity to count the paid on-call firefighters. Many times, this puts the city in the category of having more than 25 employees thus requiring a safety committee.

Regional Safety Groups (RSGs) are a flexible way for members of the LMCIT Workers' Compensation program to address the MN OSHA safety committee requirements. LMCIT partners with the Minnesota Municipal Utilities Association (MMUA) to deliver safety training and provide a forum to hold safety committee meetings. Qualifying entities are those with 50 or fewer full-time employees (FTE's).

Minn. R. 5208.0070. Minn. Stat. § 182.655.

Minn. Stat. § 182.676.

LMC Regional Safety Group program.

NEOGOV.

LMCIT RSGs work as a team to accomplish the following:

- Establish a safety committee, hold safety meetings, and develop safety coordinators.
- Develop an ongoing meeting and training schedule at the times, dates, and locations that work best for cities in the group.
- To help pay for the training, the LMCIT will subsidize as many as 12 safety training topics per year. Fifty percent of training costs are covered by LMCIT, and each group decides how to split the remaining costs among themselves. (Note the city must ensure its employees are trained on all pertinent topics even if the RSG format doesn't offer the topic.)
- RSGs can also take advantage of free web-based training provided through NEOGOV.
- RSG members get free use of *SDS Access*, an online Safety Data Sheet (SDS) management system provided by Damarco Solutions.

# D. Specific committee tasks

Minnesota OSHA describes, overtly or otherwise, the specific tasks a safety committee must either ensure or perform. The purpose of these tasks is to both take a proactive approach to safety, thereby preventing injuries, as well as respond to specific accidents and workplace hazards.

These specific topics include the following:

- Conduct self-inspections.
- Conduct job hazard analyses.
- Develop and maintain safety policies.
- Provide for employee safety education.
- Investigate workplace accidents.
- Maintain certain records including calculations of various incidence rates, Safety Data Sheets (SDS), training, etc.
- Set annual safety performance goals, which might include lowering a specific incidence rate, type, or cause of injury.
- Conduct an annual review regarding the effectiveness of the safety committee. If the safety committee isn't effective, changes are required to make improvements.

Minn. Stat. § 182.653, subd. 8(a)(2).

Minnesota Dept. of Labor and Industry, MNOSHA Workplace Safety Consultation.

### 1. Safety surveys—self-inspections

OSHA relies on inspections to identify and correct hazards—and requires an employer to do the same. Safety committee members conduct (or otherwise designate and coordinate) safety self-inspections of all municipal buildings, including interiors and exteriors and areas such as parking lots, ramps, and any areas where employees may work, including wastewater ponds and outdoor areas in treatment plants.

One of the MN OSHA AWAIR Program requirements is to determine methods the city (organization) will use "to identify, analyze, and control new or existing hazards, conditions." One of those methods is to conduct regular inspections of the work environment to include temporary environments, equipment, and tools.

A city can also invite MN OSHA Consultation to conduct a free site inspection. While no citations are generated, MN OSHA Consultation does expect the city to implement its recommendations to address hazards and improve safety.

### a. Specific safety self-inspection checklists

The purpose of these inspections is to identify, and then correct, workplace hazards before an injury occurs. Checklists serve as reminders of what to look for and as records of what has been covered. They give self-inspections direction. Checklists keep inspectors organized, provide guidelines that can be followed, and cover everything they are intended to cover. Checklists prevent vague inspections and missing things that should be identified. Generic inspection sheets are discouraged by OSHA. While city operations are similar each city work environment is unique. Also processes, tools, hazards and the physical work environment can change over time.

Equipment and work areas are not the only focus of safety inspections. Several general areas should also be inspected, such as outdoor and indoor walking surfaces, and equipment, including ladders and personal protective equipment. In addition, safety inspections should analyze security measures (to minimize workplace violence risks), fire prevention, chemical safety, machine guarding, lock-out/tag-out procedures, electrical safety, and perhaps more based on your city's environment and operations. "Job Hazard Analysis", OSHA 3071, Appendix 3 (p. 46), U.S. Dept. of Labor, Occupational Safety and Health Administration, (2002 Revised).

Job Hazard Safety Analysis, LMC model form.

For specific samples contact: Joel Muller, Field Services Manager 651.215.4079 800.925.1122 jmuller@lmc.org

### b. Frequency

A common question from members is, "How often do we have to inspect?" The answer: it depends. Some items need to be checked every day, such as egress doors and security features. Other items need to be checked every week, such as flushing emergency eyewashes and showers. Check emergency lighting on a monthly basis. While still other items must be checked at least once a year, such as a sprinkler system.

The safety committee can use its best judgement to determine the frequency of other inspections. Consideration should be given to the hazards, the likelihood and seriousness of an accident, and the number of people exposed, etc. For example, offices are generally low-hazard environments, and inspections once a year are generally adequate. However, temporary roadwork sites can have many dangerous exposures, such as temperature extremes, traffic levels, poor lighting or sight lines, and weather conditions, etc.

### 2. Conducting a job hazard analysis

Fatalities and serious injuries unfortunately happen in Minnesota cities. A job hazard analysis (JHA), also called a job safety analysis, is a proven analytical tool that examines the relationship between the worker, the task, the tools, and the work environment. Ideally, after uncontrolled hazards are identified, a city will take steps to eliminate or reduce the hazards to an acceptable risk level.

### a. Benefits

Completion of JHAs can result in fewer worker injuries and illnesses, safer and more effective work methods, and increased worker productivity. These methods can help reduce workers' compensation costs. Most injuries LMCIT sees in cities are related to ergonomic issues and slips, trips, and falls that result in strains and sprains.

JHAs can be conducted on a range of hazards, including physical, chemical, electrical, mechanical, and biological hazards. Each job or task has its own set of unique tools, equipment, setting, chemicals, physical actions, and body stresses. The first step to minimize and control injuries is to identify activities and tasks that place the employee at risk of injury.

JHAs can reduce accidents and injuries, serve as the basis for regular contact between supervisors and employees (pre-shift meetings), and function as the following:

- A teaching aid for new employees and a refresher for infrequent jobs.
- A way for supervisors to help monitor job performance by ensuring safe procedures are being followed.
- A tool in completing comprehensive accident investigations.

The completion of JHAs can produce the following results:

- Fewer worker injuries and illnesses.
- Safer, more effective work methods.
- Reduced workers' compensation costs.
- Increased worker productivity.

For a JHA to be effective, management must demonstrate its commitment to safety and health and follow through to correct any uncontrolled hazards identified. As you might expect, these corrections should be documented.

### b. Where to start

When conducting a job hazard analysis, you should take a fresh look at the way things are done in your workplace. Even though you may hear, "We've been doing it this way for 20 years and nothing has happened" doesn't mean that a hazard doesn't exist. That's why it is important to look at all possible hazards with an open mind. According to the Occupational Safety and Health Administration (OSHA), you should do the following when conducting a JHA.

### c. Involve your employees

It is very important to involve your employees in the hazard analysis process. They have a unique understanding of the job, and this knowledge is invaluable for finding hazards and ideas for how to eliminate those hazards. Employee involvement helps minimize oversights, ensures a quality analysis, and encourages workers to "buy in" to the solutions because they will share ownership in the safety and health program. Review with your employees your worksite's history of accidents and occupational illnesses that needed treatment, equipment or structure damage that required repair or replacement, and any "near misses," i.e., events in which an accident or loss did not occur but could have. These events are indicators that the existing hazard controls (if any) may not be adequate and deserve more scrutiny. Your designated LMCIT loss control consultant can create a workers' compensation loss analysis trend to assist the city in this process.

### d. Conduct a preliminary job review

Discuss with your employees the hazards they know exist in their current work and surroundings. Brainstorm with employees for ideas to eliminate or control those hazards. If any hazards exist that pose an immediate danger to an employee's life or health, take immediate action to protect the worker. Any problems that can be corrected easily should be corrected as soon as possible.

Rarely is an accident a simple case of one singular cause resulting in one singular effect. More frequently, many contributing factors tend to line up in a certain way to create the job hazards. It's important to consider this when identifying solutions.

### e. Identify workplace hazards

Start by listing jobs with hazards that present unacceptable risks based on those most likely to occur and with the most severe consequences. These jobs should be priorities for the safety committee. A job hazard analysis can be conducted on many jobs in virtually every municipal department including police, fire, office, parks and recreational facilities and public works.

A hazard is the potential for harm. In practical terms, a hazard often is associated with a condition or activity that, if left uncorrected, can result in an injury, illness, or property damage. Determining workplace hazards can be like detective work in that you are trying to determine the following:

- What can go wrong?
- What are the consequences?
- How could it arise?
- What are other contributing factors?
- How likely is it that the hazard will occur?

Ergonomic risk factors to consider might include some of the following:

- Direct pressure
- Temperature extremes
- Vibration
- Excessive force
- Repetition
- Work organization
- Awkward postures

Injuries most commonly occur when performing tasks that are frequent, performed for long periods of time, have a high intensity, and/or represent a combination of risk factors.

### f. List, rank, and set priorities for hazardous jobs

Once you have identified jobs or tasks that have the potential to hurt or are in fact hurting employees, you will need to rank these tasks and start addressing the most serious first. One method for ranking tasks considers the probability that the hazard will cause injury and an estimate of the severity of the injury. These are not precise predictions of when or how severe an injury may be, but rather estimates. Priority should go to the following types of jobs:

- Jobs with the highest injury or illness rates.
- Jobs with the potential to cause severe or disabling injuries or illness, even if there is no history of previous accidents.
- Jobs in which one simple human error could lead to a fatality, severe accident, or injury.
- Jobs that are new operations or have undergone changes in equipment, processes, or procedures.
- Jobs complex enough to require written instructions.
- Jobs where the city would hire seasonal or temporary workers.

Use the following key to establish the Risk Level Index in terms of hazards. Note that ranking may be subject to change based on additional input.

- LOW considered low risk with low priority to change.
- MOD considered moderate risk, recommend changes.
- **HIGH** considered high risk, recommend concerted effort to modify.

The Risk Level Index considers the dose (severity/stress level of the risk factors) in combination with the exposure (duration/frequency of the risk factors). The higher the values for dose and exposure the greater the estimated risk.



### g. Identify job steps

Nearly every job can be broken down into job tasks or steps. When beginning a JHA, watch employees perform the job and list each step used in the performance of the task. Be sure to record enough information to describe each job action without getting overly detailed. Avoid making the breakdown of steps so detailed that it becomes unnecessarily long or so broad that it does not include basic steps.

It is always a good idea to photograph a task being done and videotaping is even better. Your smart phone is a quick and easy way to capture the steps of a task. These visual records can be handy references when doing a more thorough analysis of the work. "Pictures speak a thousand words" and incorporating them into a JHA is a very effective way to convey the message.

### h. Provide solutions

After reviewing your city's list of hazards, consider what control methods and/or tools will eliminate or reduce the hazards. Elimination is the first choice. If that isn't feasible the most effective controls are engineering controls that physically change or isolate a hazard. Examples include changing a machine or work environment, improving chemical handling, or introducing the use of equipment to prevent employee exposure to the hazard. Find blank model JHA's in Section II-2, *Conducting a job hazard analysis.* 

For more samples contact: Joel Muller, Field Services Manager 651.215.4079 800.925.1122 jmuller@lmc.org The more reliable a solution the less likely an employee will circumvent a hazard control. If this is not feasible, administrative controls may be appropriate. This may involve changing how employees do their jobs. An example of this might be limiting the amount of time a worker is exposed to a hazard. If those two methods are not enough to remove or reduce the worker exposure to acceptable levels, then it might be necessary to use personal protective equipment.

### i. JHA forms

There are a variety of JHA forms and checklists available. They may look slightly different at first glance, but they all tend to contain the same information. There are generally three columns on the form. The first column identifies the job steps or tasks, the second column is for hazard identification, and the third column is for recommended solutions. The League has many completed samples available on request.

### j. Periodic review

It is very important to periodically review your JHAs to ensure the JHA continues to reflect how certain jobs are done, and that there aren't new approaches in which to control the hazards that weren't previously identified. Even if the job has not changed, it is possible that during the review process new hazards will be identified.

It is particularly important to review your job hazard analysis if an illness or injury occurs on a specific job. Based upon the circumstances, the city may determine to purchase equipment or change the job procedure to prevent similar incidents in the future.

If an employee's failure to follow proper job procedures results in a "close call," discuss the situation with all employees who perform the job and look closely at the job steps to determine if there is a better way to do the job. Any time a JHA is revised, it is important to train all employees affected by the changes in the new job methods, procedures, equipment, or protective measures adopted.

A job hazard analysis is only one component of the larger commitment to an effective safety and health program. Accepting a risk isn't the same as eliminating or controlling it.

## 3. Safety policies

Many Minnesota cities are required by various MN and federal OSHA standards to develop and implement written policies for components of its employee safety program. From a practical standpoint, safety policies provide city employees with guidance on how to perform work tasks in a safe fashion.

Many safety policies will be specific because they are based on specific OSHA standards; particularly those that apply to one category of hazard, such as logging, fall protection, bloodborne pathogens, and trenching. No matter what type of industry, many employers across the state or country that have these work operations and inherent hazards are expected to implement the safety policies.

Other written programs, such as Minnesota's AWAIR, are written for consideration of hazards found in a specific employer's work environment. Similar employers, such as cities, have a lot in common in terms of equipment, operations, and tasks and, therefore, will have similar written programs. While similar there might be differences as well, and this must be accounted for in each employer's safety program.

OSHA also provides sample programs on many safety topics. These are intended to provide examples of written programs on various workplace safety and health topics. Employers can use these sample programs as a guide when developing its customized programs tailored to operations and hazards in their specific workplaces.

## 4. Employee safety training

A written safety and health program are just words on paper if management and employees are not aware of it and don't understand it. Employees cannot follow safety rules, identify hazards, use correct work procedures or protective equipment, or work to achieve safety goals if they do not have the necessary knowledge to do so.

Safety training is essential for maintaining compliance with regulations, keeping workers' compensation costs down, and, most importantly, keeping your most valuable resource—employees—safe and healthy. Part of training includes training on the policies discussed above. OSHA's training guidelines follow a model that consists of the following:

U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), Sample Programs.

"Training Requirements in OSHA Standards and Training Guidelines", Pub. 2254-09R, U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), 2015.

- Determining if training is needed.
- Identifying training needs.
- Identifying goals and objectives.
- Developing learning activities.
- Conducting the training.
- Evaluating program effectiveness.
- Improving the program.

The model is designed to be one that even an entity with very few employees can use without having to hire a professional trainer or purchase expensive training materials. Using this model, employers or supervisors can develop and administer safety and health training programs that address problems specific to their own operations, fulfill the learning needs of their own employees, and strengthen the overall safety and health program of the workplace.

The first step in the training process is a basic one: to determine whether a problem can be solved by training. Whenever employees are not performing their jobs properly, it is often assumed that training will bring them up to standard. However, it is possible that other actions (such as hazard abatement or the implementation of engineering controls) would enable employees to perform their jobs properly.

Problems that can be addressed effectively by training include those that arise from lack of knowledge of a work process, unfamiliarity with equipment, or incorrect execution of a task. Training is less effective (but still can be used) for problems arising from an employee's lack of motivation or lack of attention to the job. Whatever its purpose, training is most effective when designed in relation to the goals of the employer's total safety and health program.

Today's reduced budgets and staffing make it more challenging for cities to conserve resources while also ensuring city employees are provided the best available information to keep them safe as they perform their assigned duties. The League of Minnesota Cities Insurance Trust offers low-cost employee safety training through NEOGOV and through safety coordinators for members in Regional Safety Groups. Cites can also supplement training with the League's free streaming safety video library through CoastalFlix. Cities can also access webinars on the League's website. League field consultants can provide Train-The-Trainer for office ergonomics and self-inspections. The Minnesota Safety Council offers several opportunities for safety training. Both Minnesota state and Federal OSHA offer some online training and in-person training on topics such as workplace violence and chainsaw safety.

NEOGOV. LMC Regional Safety Group. CoastalFlix LMC Webinars.

Minnesota Safety Council.

Minn. Stat. § 182.653, subd. 2.

LMC information memo, *Potential Infectious Disease Exposures in Municipal Operations.*  Periods of budget cutbacks also often mean that new duties are assigned to employees who—while they may be familiar with the required functions of the job—are less familiar with all the associated hazards. The more duties that are assigned to one person, the more training/refresher training will be required to keep that employee current on the requirements and precautions needed to perform the job safely.

Building a solid safety training program requires that cities first determine exactly what their specific training needs are for each city department. Questions to help identify these needs include the following:

- What does the OSHA standard (if one exists and applies) require?
- Does the "General Duty Clause" apply for hazards that don't have a specific standard? (tuberculosis, workplace violence, and ergonomics are examples)
- What job activities are employees doing?
- What are the hazards within each job? Hint: JHAs can help with this!
- Do employees use personal protective equipment during any job activities?
- What are other similar city departments training on?

To stay current with state and federal regulations, and maintain an effective safety training program, cities should review their current training programs by asking the following questions:

- Which employees need to be trained?
- What topics require employee training?
- How much training is required for each topic?
- When should training be conducted?
- What format of training will provide the best training that effectively utilizes available resources?

In order to keep building upon your safety training program, be mindful of areas where safety training would be necessary to minimize employee exposures and increase overall employee safety. Training topics for typical municipal operations may include these:

LMC Safety Training Table.

- AWAIR
- Bloodborne Pathogens
- Tuberculosis
- Confined Space
- Emergency Plan
- Employee Right to Know
- Earth Moving
- Fall Protection
- Hearing Conservation
- Lead
- Lock-out/tag-out
- Logging
- Machine Guarding
- Personal Protective Equipment
- Portable Fire Extinguishers
- Powered Industrial Trucks
- Respirator Use
- Silica
- Scaffolds
- Trenching and Shoring
- Welding/Cutting/Braising
- Ergonomics–Office & Shop
- Slip/Trip/Fall Prevention
- Workplace Violence
- OSHA Recordkeeping–300 log & forms
- Return to Work
- CPR/First Aid/AED
- Defensive Driving

### a. Building or rebuilding a safety training program

The following are some additional loss control points to consider when building/rebuilding your safety training program. Use the loss control points below to help determine what is needed or missing from your safety training program. Then you must determine the most efficient ways to fill in those "blanks" to build the strongest possible safety training program.

### (1) Prioritize safety training

Provide training on required programs, particularly those with severe exposures, and ensure that employees whose work exposures present a higher risk of employee injury/illness are receiving the most effective safety training.

Minnesota Safety Council.

Minnesota Dept. of Labor and Industry, MNOSHA Workplace Safety Consultation.

U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), Logging e-Tool.

### (2) Select qualified trainers

Community colleges, safety training companies, and the Minnesota Safety Council are good resources for safety training. So is MN OSHA Consultation. Cities can find some online training at the OSHA website in the form of training workbooks and e-Tools. In these days of consolidation, cities may find it cost effective to work together to develop training programs, bring in trainers, or attend training hosted by other cities in order to accomplish their overall training objectives. Cities should also look internally, such as the fire department, to help provide certain safety training for their city staff.

### (3) Use appropriate training locations

Cities may work with safety training companies that provide employee in-house training, through lecture, hands-on, or multimedia formats. Other cities may work with each other and share training locations, such as with an LMCIT Regional Safety Group. Also, less formal training can be conducted on the jobsite, such as "toolbox talks." Whichever type of venue is used, ensure the training environment is comfortable, quiet, and provides minimal distractions.

### (4) Keep training relevant

One issue with general training materials, and safety polices for that matter, is that "*Your company name here*…" can be a real turn off for employees. OSHA requires that training be specific to the employer's work environment. General training materials can be an effective component of training, however, only as a portion or supplement of safety information that must be covered.

Training programs in specific standards, such as noise, logging, etc., shall cover all key concepts and actual employee duties. Training should incorporate actual examples from job duties. Training based on theory, without practical application, often leaves employees confused when confronted with real world safety exposures. If the city has specific policies, procedures, or requirements that provide for additional protective measures, these should be covered during training sessions.

### (5) Provide for employee participation

Provide an opportunity for employee questions and feedback. It is better for employees to have their questions answered during safety training than have them make uninformed decisions while performing their job duties. Also provide opportunities for employees to demonstrate their knowledge and skills. This can be accomplished by observing hands-on work assignments, written tests, or question and answer sessions.

"Training Requirements in OSHA Standards and Training Guidelines", Pub. 2254-09R, U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), 2015.

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Minnesota Safety Council. 651.291.9150 800.444.9150.

Minnesota Dept. of Labor and Industry, MNOSHA Workplace Safety Consultation. Osha.consultation@state.mn.us 651.284.5060.

### (6) Document all safety training

Undocumented training is often considered the same as no training. In general, proper documentation includes the topic of the training, the name, title, and brief qualifications of the trainer, the date and time of the training, methods of training (video, written materials, discussion, etc.), and copies of any forms or tests completed by the employee. A sign-in sheet and/or certificate of completion form is usually required to establish an employee's participation in the training.

### (7) Develop a training schedule

Once you've determined what topics require training, it is best to develop a schedule of when sessions will be conducted. Having a schedule to follow makes the task more manageable and provides some guidance for coordinating scheduled work and training throughout the year.

### (8) Further assistance

More information on OSHA and safety training can be found on the League website or by contacting safety organizations or OSHA consultants. League staff is also happy to respond to questions.

# 5. Accident investigations

Thorough investigations should be conducted into both accidents and incidents. For the purpose of this memo, accidents and incidents are defined as unplanned or unforeseen events that result in injury or property damage. Incidents are actions or events that may not have resulted in a loss but had the potential for injury or property damage.

### a. Why investigate accidents

Experience is the best teacher. Accidents that have occurred once have the potential to occur again, particularly if underlying causes are not corrected. An effective investigation will uncover the root cause of an accident and help to develop an action plan aimed at preventing similar occurrences in the future. Minnesota OSHA considers accident investigation so important that the process is a requirement in a city's overall safety program. The Minnesota OSHA required Workplace Accident and Injury Reduction (AWAIR) Program requires employers identify the way in which workplace accidents will be investigated and how corrective action will be implemented.

### b. Who should conduct investigations

Often, the injured employee's immediate supervisor is a good choice to conduct an investigation, as their knowledge of department operations gives them insight into causes of an accident that an outsider may not have. Department managers also should participate in any investigations occurring within their department as well as any person or safety committee member that will bring specialized knowledge for a particular investigation. Safety committees also play an important role in accident investigations. They should review the supervisor's report of injuries and accidents to address the following:

- Confirm an adequate investigation was completed.
- Conduct further investigation as necessary.
- Discuss corrective actions needed.
- Make sure corrective actions (controls) are put in place.
- Monitor the effectiveness of controls and make changes as necessary.
- Periodically review and analyze efforts to identify trends or patterns to prevent future occurrences.

### c. When to investigate

Accidents should be investigated as soon as possible, but only after the situation has been stabilized. First, ensure that injured employees receive immediate medical attention if necessary and secure the area to prevent further injuries or damage. Early investigations are important because the occurrence is still fresh in people's minds, physical circumstances have not significantly changed, and people who have seen all or part of the accident event are still available.

Every accident and incident should be investigated, regardless of whether it resulted in an injury. The effort put into any investigation should be weighed against the potential for harm and the frequency of occurrence. The highest priority should be given to serious accidents that occur frequently, with lower priority given to a rare risk of minor injury. Use common sense to judge how best to determine an investigation effort.

LMC information memo, *LMCIT* Workers' Compensation Claim Management.

### d. How to investigate accidents and incidents

The purpose of an accident investigation is to discover facts about the underlying (root) causes of an accident and is not to place blame. It is an effort to prevent future occurrences. The following are steps to guide you in an investigation.

### (1) Gather information

Gather all preliminary information available regarding the accident. Take measurements, pictures, or even video if that will help capture information essential to understanding all the contributing factors. You may also need information regarding similar accidents that have occurred in the past.

### (2) Interviews

Talk with people who saw/heard all or part of the accident or who otherwise might help to determine root causes. Discuss with the injured person, when available, the details surrounding the accident. You will likely need to ask the employee to slow down or repeat parts of the sequence of events to fill in important details. Obtain the injured person's suggestions for eliminating the hazard(s) which contributed to the accident (or incident) and subsequent injury.

### (3) Document results

Document your efforts on the Supervisor's Report of Accident and Employee Incident Report forms. Accident investigation reports should contain the following:

- Information regarding the injured person and injuries sustained.
- What the employee was supposed to be doing.
- What was actually being done at the time of the accident.
- How it was being done.
- Training the person has received.
- Past accident record.

### (4) Examine the accident site

Examine the tools, machinery, protective equipment, and other physical conditions as they existed at the time and place of the accident. Don't throw away broken or damaged items as they may be used in future litigation.

### (5) Identifying root causes

A tool to help identify root causes of accidents is the "fishbone" causeand-effect diagram. This diagram was created by Kaoru Ishikawa (1915-1989) of Japan and starts with a problem on the right side and builds causes to the left side. Root causes can be identified by asking "Why?" or "Why not?" to get to the next root cause in each of the main categories. Accidents occur due to a failure in one or more of these areas.

The simplified version that follows identifies four main categories to help guide the investigation process: People, Equipment, Policies and Procedures.



People make choices based upon their skill, knowledge, and available resources, and it's important to look at how these areas contributed to the accident.

Equipment used on the job also tells a story. Identifying all the equipment used (or not used), how it was used, when it was used, where it was used, and the condition it was in at the time of the accident are all valuable pieces of information in the investigation process.

Management's role is to make sure employees have the necessary skills, knowledge, and resources to perform a job safely. This includes selecting individuals with the necessary skills to do the job, providing knowledge through ongoing training, and providing necessary resources.

Lastly, look at environmental factors and their role in the accident, e.g., lighting/visibility, ventilation, arrangement of area, and weather conditions, etc.

### (6) Developing corrective action

Study what you learned from the investigation and what changes can be made. Apply alternate methods for increasing personal protection if eliminating or controlling hazards is not possible. Any reduction of the hazard is better than taking no action. Once you've implemented a change, possibly a corrective action, follow up to ensure the actions taken are working as necessary.

Time and effort expended on accident investigations can be lost if the resulting recommendations are never put into practice. Arrange for prompt consideration and implementation of recommendations resulting from an investigation.

# E. Set annual safety goals

Central to the MN AWAIR Program are the goals and objectives an organization sets each year. The goals establish the direction of the safety program and state what the city is attempting to achieve through the safety program. Goals should be generally challenging to reach or complete but are also possible to achieve. Objectives are specific actions taken to attempt to achieve those goals. Objectives can either be measured or demonstrated.

Goals can include such items as reducing a type or cause of injury, completing or revising of safety policies and procedures, purchasing or replacing equipment to reduce hazards identified on a JHA, and decreasing workers' compensation insurance costs.

# F. Conduct an annual review regarding the effectiveness of the safety committee

Each year the committee must evaluate what's been, or not been, accomplished, analyze the status of goals set at the beginning of the year, and then form an opinion on the overall effectiveness of the committee. "All safety and health committee recommendations or reports made to the employer shall be kept by the employer for two (2) years. ..." If OSHA Compliance comes to call, the officers will likely want to see records of the safety committee's work and management's response to safety recommendations.

Recall MN OSHA's Safety Committee Standard is a performance standard which means the committee must set and complete safety goals. In order to meet that requirement, the committee must be effective. To help determine effectiveness, it is a good practice to ask some specific questions: Does committee membership reflect a good balance of the workforce? Does it work well as a team? Do committee members get things accomplished? See Section IV, *Measurements*, below.

U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), Recordkeeping – Final Rule.

Minnesota Dept. of Labor and Industry, MNOSHA Compliance – Rulemaking.

Minnesota Dept. of Labor and Industry, MNOSHA Compliance -Recordkeeping Standard. Minnesota Dept. of Labor and Industry, MNOSHA Workplace Safety Consultation.

First Report of Injury.

Online Claim Submission for LMCIT members.

Fax: 888.234.7839 or 651.281.1297.

Mail to: LMCIT Claims 145 University Av W St. Paul, M 55103-2044

# III. Recordkeeping and insurance reporting requirements

The OSHA recordkeeping system was developed as a nationally standardized system for employers to keep track of the work-related injuries and illnesses for each business establishment. This tracking system provides a tool for employers to monitor the performance of their workplace safety programs and compare their performance to state and national standards.

Changes to OSHA's injury reporting rule became effective at the federal level Jan. 1, 2015. Minnesota OSHA adopted the new injury reporting requirements March 16, 2015, with an effective date of Oct. 1, 2015.

Federal OSHA has a recordkeeping rule, which took effect Jan. 1, 2017, requiring certain employers to electronically submit injury and illness data that they are already required to record on their onsite OSHA Injury and Illness forms. Minnesota OSHA (MNOSHA) adopted this final rule and it became effective on May 21, 2018.

The MN OSHA web link has excellent information on how to complete, maintain, and post these logs. And MN OSHA Consultation offers training. An employer can also talk to an OSHA consultant if there are any questions on how to maintain the logs.

While similar, OSHA log cases are not the same as Minnesota workers' compensation claims. Some injuries and illnesses will not be included in both systems.

# A. Insurance reporting

Minnesota's state government workers' compensation system was developed as an administrative system to provide predictable, equitable, and timely benefits to injured workers. This system requires an insurance component to provide the funds to pay for the benefits and match business risks to insurance costs. Each state developed an independent workers' compensation system, and these were in place decades before the Occupational Safety and Health Act became law.

Cities must report workplace injuries to the LMCIT claims department by using the Department of Labor and Industry form called a First Report of Injury (FROI) form. It is important the employer, not the employee, complete these forms promptly. The FROI must be submitted to LMCIT as soon as possible and no later than 10 days after the accident. Delays in reporting injuries can result in fines to both LMCIT and the city. Have a strong policy in place directing employees to report all accidents and injuries. After receiving a report, the supervisor must report the accident to department management and possibly to the safety committee for review. The supervisor can use a Supervisor's Report of Accident Analysis form to assist with the investigation and have the employee complete the Employee Incident Report form. Remember any conclusions and/or recommendations from the investigation should be reported in order to help prevent an accident from recurring.

# B. OSHA reporting

OSHA is very sensitive to the under-reporting of accidents, and the violation of this requirement is one of the most frequently cited across the nation. OSHA reporting requirements apply to employers with 11 or more full- or part-time employees.

Under the standard, employers must use OSHA forms to log work-related injuries and illnesses, to keep a summary of those injuries and illnesses, and to keep a record of each incident in the log. Alternatively the incident record may be the workers' compensation First Report of Injury form.

OSHA requires employers to record all workplace injuries and illnesses that meet certain criteria and to maintain these records for five years. Step-by-step instructions, training, and samples of required forms are available online at the Minnesota OSHA Compliance Recordkeeping Standard website. Alternately a packet of forms can be mailed to you.

## 1. Sharps injury log

Job hazards for employees such as paramedics, emergency medical technicians, peace officers, or firefighters include routine exposure to blood or other potentially infectious body fluids "through either debris or contamination at a scene or through the equipment used to provide medical treatment." Since publication of the Bloodborne Pathogens Standard, a wide variety of medical devices have been developed to reduce the risk of needle sticks and other sharps injuries. These "safer medical devices" replace sharps with non-needle devices or incorporate safety features designed to reduce the likelihood of injury.

29 C.F.R. § 1910.1030, Exposure to BBP Needlesticks and Other Sharps Injuries. Needle sticks and other percutaneous injuries resulting in exposure to blood or other potentially infectious materials continue to be of concern due to the high frequency of their occurrence and the severity of the health effects associated with exposure. The Centers for Disease Control and Prevention has estimated that healthcare workers in hospital settings sustain 384,325 percutaneous injuries involving contaminated sharps annually. When non-hospital healthcare workers are included, the best estimate of the number of percutaneous injuries involving contaminated sharps is 590,164 per year. When these injuries involve exposure to infectious agents, the affected workers are at risk of contracting disease. Workers may also suffer from adverse side effects of drugs used for postexposure prophylaxis and from psychological stress due to the threat of infection following an exposure incident.

Employers must establish internal procedures to document the route of exposure and the circumstances under which an exposure incident occurred. This information should include the following:

- Engineering controls in use at the time.
- Work practices followed.
- A description and brand name of the device in use.
- Protective equipment or clothing that was used at the time of the exposure incident.
- Location.
- Procedure being performed when the incident occurred.
- The employee's training.
- The injured employee's opinion about whether any other engineering, administrative, or work practice control could have prevented the injury and the basis for that opinion.

### 2. Employee exposure and medical records

Unless a specific occupational safety and health standard provides a different period, OSHA requires employers to retain and or/preserve certain records for up to 30 years. Each employer is responsible for assuring compliance with this section, but the activities involved in complying with the access to medical records provisions can be carried out, on behalf of the employer, by the physician or other health care personnel in charge of employee medical records. Employers just need to be able to access them as needed.

Medical records, including job placement medical examinations, are confidential whether they be collected during employment or during the job offer process. As such records need to be retained in a secured system, be it secured electronically or in a locked file cabinet.

29 C.F.R. § 1910.1020(d)(1)(i).

An "employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel or technician and includes the following:

- Medical and employment questionnaires or histories (including job description and occupational exposures).
- the results of medical examinations (pre-employment, preassignment, periodic, or episodic) and laboratory tests (including chest and other X-ray examinations taken for the purpose of establishing a base-line or detecting occupational illnesses and all biological monitoring not defined as an "employee exposure record"),
- The results of medical examinations (pre-employment, preassignment, periodic, or episodic) and laboratory tests (including chest and other X-ray examinations taken for the purpose of establishing a baseline or detecting occupational illnesses).
- All biological monitoring not defined as an "employee exposure record."

It's not often that a city goes out of business, so to speak, but it does happen and occasionally cities merge with other cities or townships. OSHA requires that whenever an employer is ceasing to do business, the employer shall transfer all records subject to this section to the successor employer. The successor employer shall receive and maintain these records.

With some exceptions and unless a specific occupational safety and health standard provides a different period, employers shall assure the preservation and retention of medical records for at least the duration of employment plus 30 years.

### 3. Employee exposure records or industrial hygiene records

Employee exposure records, or the gist of them, must be preserved and maintained for 30 years. These are records that contain any of the following kinds of information:

- Environmental (workplace) monitoring.
- Measuring of a toxic substance.
- Harmful physical agent, including personal, area, grab, wipe, or other form of sampling.
- Related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained.

29 C.F.R. § 1904.39.

Minnesota Dept. of Labor and Industry, Research and Statistics – Occupational Safety and Health Statistics.

### 4. Safety data sheets

Safety data sheets (SDS), formerly known as material safety data sheets (MSDS), are records concerning the identity of a substance or agent. These indicate if the material may pose a hazard to human health. They need not be retained for any specified period if some record of the identity (chemical name if known) of the substance or agent, where it was used, and when it was used is retained for at least 30 years.

# **IV. Measurements**

The Bureau of Labor Statistics gathers an annual sample of the OSHA logs to compute national injury and illness estimates, providing statistics for workplace safety researchers and benchmarks for employers. OSHA collects log data annually in selected industries and establishment sizes to help the federal and state OSHA compliance system identify establishments for inspection. This data is then analyzed and placed on the Minnesota Department of Labor and Industry website. Several of these measurements can be used to benchmark the city's experience against its peer industry across the state and across the country.

The following are measurements a city can calculate each year to objectively and accurately monitor the success of the safety program in general and the management of the workers' compensation program in particular.

The safety committee's annual report to management can include data presented in numeric as well as graphic formats. The graphic format is essential to show the relationship of the data within a certain year and from one year to another. The annual report can include a narrative analysis of the data and detailed conclusions about how effective the safety program has been over the last year. The following are detailed descriptions of key safety program measurements.

Total Costs Including Medical, Indemnity, Permanency and Legal: These can be adjusted for the time value of money and trended over time for comparison from year to year.

Review of High-Cost Cases: An analysis of high-cost cases (over \$500,000 in combined medical and indemnity costs) for high-risk aspects of the job, red flag attributes of the employee, breakdowns in the WC injury management processes, breakdowns in the organization on communication, high-risk providers, and how these cases relate to the trends noted for part of body injured/cause of injury/nature of injury. Usually frequency breeds severity.

# A. Frequency rate

The frequency rate is a measure of the number of OSHA-recordable injuries per 100 workers. It is important that the OSHA 300 log is accurate. The frequency rate should be compared as a trend from year to year.

Frequency is calculated as the number of OSHA-recordable injuries multiplied by 200,000 and divided by the number of labor hours (not FTEs) from 1/1 of any year through 12/31 of that year. This does not include vacation, sick, or holiday hours—only actual hours worked.

# B. Severity rate

Severity Rate by Cases: The severity rate by cases is a measure of the number of lost time case injuries (involving days away and/or alternate duty) per 100 workers. This should be compared as a trend from year to year.

Severity Rate by Cases is calculated as the number of lost time case injuries (off work and alternate duty work) multiplied by 200,000 and divided by the number of labor hours from 1/1 of any year through 12/31 of that year. This does not include vacation, sick, or holiday hours—only actual hours worked.

Severity Rate by Days: The severity rate by days is a measure of the total number of lost time days (days away and alternate duty) per 100 workers. This should be compared as a trend from year to year. Given that many lost time days are alternate duty days, this represents some hidden financial costs to the city.

# C. Repeater trends

This identifies employees that are repeatedly injured in the work environment. This should be evaluated both within a specific calendar year as well as from year to year. This is used to identify high-risk jobs as well as high-risk individuals so that specific safety and human resources controls can be implemented.

# D. Simple averages

Average Number of Indemnity Claims: A simple average of the number of indemnity claims over a calendar year. This should be compared as a trend from year to year. The data could be calculated to reflect the time value of money. Average Cost of Indemnity Claims: A simple average of the cost of indemnity claims over a calendar year. This should be compared as a trend from year to year. The data should be calculated to reflect the time value of money.

Average Cost of Medical Only Claims: A simple average of the cost of medical claims over a calendar year. This should be compared as a trend from year to year. The data could be calculated to reflect the time value of money.

# E. Other measurements

Part of Body Injured: Helpful in job hazard analysis assessments. The safety committee can use this with other data to identify and correct hazards of the job. The safety committee can use these trends to identify priorities and focus resources.

Nature of Injury: Helpful in job hazard analysis assessments. The safety committee can use this with other data to identify and correct hazards of the job. The safety committee can use these trends to identify priorities and focus resources.

Cause of Injury: Helpful in job hazard analysis assessments. The safety committee can use this with other data to identify and correct hazards of the job. The safety committee can use these trends to identify priorities and focus resources.

Department or Job Title: Helpful in job hazard analysis assessments. The safety committee can use this with other data to identify and correct hazards of the job. The safety committee can use these trends to identify priorities and focus resources.

Case Type—Near Miss/First Aid/Medical Only/Indemnity: Analysis of the root cause of all of these gives feedback on the effectiveness of safety efforts in the organization. All of these markers can identify trends of increasing or decreasing severity of injuries, i.e., more indemnity claims would indicate increased severity. More near miss and first aid cases would indicate decreasing severity. This should be compared as a trend from year to year.

Organization Specific Trends: Certain types of injuries are typical in specific types of cities. These trends can be turned into rates just like the frequency and severity rates discussed above. For statistical analysis purposes many of these subgroups of injuries are calculated per 10,000 workers. Several of these can also be benchmarked against an organization's peer industry. U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), Business Case for Safety and Health.

U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), \$afety Pays Program.

U.S. Dept. of Labor, Occupational Safety and Health Administration (OSHA), Employer Responsibilities.

# V. Summary: The business case for safety and health

Let's face it. For some city employees about the worst task that can be assigned is sitting on the safety committee. It can be daunting for a safety committee to be successful when it doesn't have the knowledge or support, financial and otherwise, and encouragement of upper management, or even the employees for that matter. Conversly how thrilling for a committee member to know when the work the committee does makes a real difference in peoples' lives.

A perennial question asked of Loss Control is, "how much would it have cost for the accidents that never happened?" That's a legitimate question but often hard to answer. And it's not all about the money. Sadly some injured city employees never return to their chosen occupation. And, while infrequent, some never make it home. It's a simple fact that some of our city employees are in dangerous occupations. Federal OSHA does weigh in on the value question: "Employers that invest in workplace safety and health can expect to reduce fatalities, injuries, and illnesses. This will result in cost savings in a variety of areas, such as lowering workers' compensation costs and medical expenses, avoiding OSHA penalties, and reducing costs to train replacement employees and conduct accident investigations. In addition, employers often find that changes made to improve workplace safety and health can result in significant improvements to their organization's productivity and financial performance."

The business case does need to be answered for city administration and for the city council. And OSHA provides resources, including a safety calculator, that can help the safety committee make the business case for new equipment or process changes.

Ensuring and managing employee health and safety is part of doing smart, responsible business in Minnesota. OSHA says most successful injury and illness prevention programs are based on a common set of key elements that include management leadership, worker participation, hazard identification, hazard prevention and control, education and training, and program evaluation and improvement.

If you don't know who your Loss Control Consultant is, or how to contact them, contact: Joel Muller, Field Services Manager 651.215.4079 800.925.1122 jmuller@lmc.org. This memo touches on the numerous and important tasks of the safety committee. It provides guidance on the structure of safety committees and offers some tools to help the committee accomplish its work. It provides a guide for measuring the effectivness of the committee. These measurements can help the city establish objective and substantive goals. The League of Minnesota Cities' Insurance Trust Loss Control professionals are available to members to provide specific employee health and safety assistance.