

County Commissioners Association of Ohio

10 Step Safety Plan for County Government

Purpose: In order to meet the needs of County Government in effectively addressing workplace safety and risk management, the County Commissioners Association of Ohio has adapted the *Bureau of Workers' Compensation's 10 Step Business Plan for Safety* to work within the unique structure of County Government in Ohio. This 10 Step Safety Plan for County Government is the result.

The CCAO Group Rating and Group Retro Plans have adopted this Safety Plan as the core safety and claim management tool for member counties. All counties participating in CCAO Workers' Comp Groups are asked to begin implementation of this plan when they join the group, and track their progress each year they are group members.

Step 1: Active, Visible Senior Management Leadership Requirements

- A. Authorization of **necessary resources** for accident prevention.
 1. **Commissioners designate (or hire) a Safety Coordinator/Workers' Comp Coordinator** who will be responsible for coordinating the 10 Step Safety Plan.
 - Identify additional personnel with safety responsibilities. Ask other Elected Officials to identify employees with safety responsibilities.
 2. Commissioners pass a resolution stating that they will authorize the resources necessary for safety / accident prevention.
 - Demonstrate that money is spent to purchase safety equipment, provide training, pay Safety Coordinator/Workers' Comp Coordinator, etc.
 - Demonstrate that individual department budgets also include safety expenditures - Highway Department, Water/Sewer Department, Sheriff, Board of DD, and others.
 3. Identify outside resources which will be used to improve workplace safety (i.e., CORSA / CCAO, BWC, Division of Safety and Hygiene, PERRP – Public Employee Risk Reduction Program).
- B. Commissioners issue a **written safety policy** with annual and long-term goals.
 1. Express the county's commitment to workplace safety and health.
 2. Outline the respective responsibilities of Elected Officials, Department Heads, managers, supervisors, team leaders and employees regarding safety.
 3. Express a commitment to safely returning injured or ill employees to work at the earliest opportunity.
 4. Request that Elected Officials to adopt and implement the Commissioners' policy or draft and implement their own.
 - Safety policy signed by all Elected Officials and/or Department Heads.
- C. Commissioners, Elected Officials and Department Heads **visibly participate** in safety processes.

1. Include safety on the agenda of regularly scheduled staff meetings in departments throughout the county.
2. Include safety on the agenda of regularly scheduled meetings between Commissioners and Department Heads / Elected Officials.
 - Document in minutes of Commissioners' public meetings.
3. Commissioners request Elected Officials / Department Heads attend at least one safety training session, safety committee meeting, safety inspection or other "front line" safety activity per year to demonstrate leadership commitment.

D. Commissioners assign accountability for accident prevention activities and processes to all Elected Officials and Department Heads.

1. Identify injured employee's department for every workers' comp claim. Report to all Elected Officials and Department Heads the number and type of work injuries occurring in their department.
 - Request that Elected Officials and Department Heads respond and describe safety activities going on in their department.
 - Make report and response available to the public. (Omit employee names and confidential medical information).
2. Do the following in departments under the Commissioners, and request that other Elected Officials do the same:
 - Distribute quarterly accident data to each department (omit employee names) where management level staff will discuss causes, plan and execute safety activities that address prevention.
 - Make safety material available to department managers and train them in their role in maintaining a safe work place.
 - Departments will report back to Commissioners regarding ongoing safety activities aimed at safe work practices.
3. Investigate and consider implementation of a workers' comp premium charge-back program based upon each office/department's individual claims experience. Departments/offices having more claims and generating the most in claim costs would pay more in premium. See ORC §4123.41 and CCAO County Advisory Bulletin 2005-01 available at www.CCAO.org

E. Assessment of the safety process.

1. Conduct a survey of Commissioners' employees and supervisors to solicit feedback on safety issues and the progress of safety program.
2. Conduct internal inspections / safety audits of all locations.
3. Supply a safety comment confidential drop box.
4. Ask that other Elected Officials do the same in their offices.

F. Elected Officials, Department Heads and Managers should encourage employees to take an active part in maintaining a safe workplace by at least one of the following:

1. Recognizing employees with safe work practices.
2. Providing means for employees to report and abate hazards.
3. Discussing safety with employees when in their work area.

Step 2: Employee Involvement and Recognition

Requirements

A. **Safety Involvement Team / Safety Committee.** Commissioners will start a county wide Safety Committee for their employees and request all Elected Officials send a representative.

1. Balanced membership - supervisors/employees, all departments/offices.
2. Meet at least quarterly.
 - Discuss accidents, review accident investigation reports and employee concerns, make recommendations for improving safety practices.
 - Request that Elected Officials/Department Heads make timely response to recommendations regarding their office.
 - Written minutes that are posted.
 - Safety Committee members accessible to employees to discuss safety concerns.

Commissioners will do the following for their Departments, and request that other Elected Officials do the same:

B. Accident investigation process will **include input** from employees and supervisors (as a witness to accident, or to recommend prevention, etc.).

C. Safety Coordinator or Department's Safety Officer will **solicit employee input** during periodic safety inspections.

D. Managers, supervisors and employees **jointly participate** in safety training.

E. **Recognize safe employees** by at least one of the following examples (or other method applicable to the individual department):

1. Supervisors observe and recognize safe employees / practices on a daily basis.
2. Review safety behavior / practices (positive and negative) in supervisor and employee performance evaluations.
3. Incentives which recognize and reward employee's safe behavior.
4. Include "violation of safety rule / unsafe behavior" in employee discipline policy and enforce when appropriate.

Step 3: Medical Treatment and Return to Work Practices Requirements

A. Commissioners establish **written centralized policies and procedures** for managing all work related injuries, coordinated by their designee (safety coordinator or workers' comp coordinator) which include:

1. Procedures for obtaining medical treatment.
 - Written procedure explaining what an injured employee should do.
 - Develop a relationship with MCO, local medical facility and doctors.
 - Educate supervisors and employees on program and procedures.

2. Require that all injuries be **reported immediately** to supervisor for documentation. Supervisor then reports the injury to safety coordinator/workers' comp coordinator.
3. Require that all injuries be **investigated** (including witness statements) within 24 hours so that corrective safety measures can be taken.
 - Supervisor or safety committee to review findings and make additional recommendations, if necessary.
4. Require supervisor or Safety Coordinator/Workers' Comp Coordinator to **contact injured employees** regularly to get an update on their status.
 - Ongoing communication between supervisor, SC/WCC, MCO, doctor, transitional work developer (if applicable) and employee.
5. Request a **commitment** from each Elected Official and Department Head to implement a **transitional work program** to keep injured employees working during their recovery or to return injured employees to the workplace as safely and quickly as possible. Ohio Bureau of Workers' Compensation Transitional Work Grant Program is a valuable resource to counties in developing a transitional work program.
 - Safety Coordinator/Workers' Comp Coordinator (with assistance from Transitional Work Developer, if available through BWC transitional work grant) will draft Transitional Work Policy, including job descriptions, which will be implemented in all lost time claims.
 - Transitional Work would be available to an injured employee for a limited period of time, as provided in the county's policy.
 - SC/WCC will request that the Elected Officials / Department Heads provide transitional duty job descriptions when needed.
 - With regard to the injured employee, the SC/WCC will communicate with the employee's supervisor, doctor, the MCO and transitional work developer (if available) regarding transitional work so that the doctor can determine if employee can return to work with modifications (as described in transitional work job description).
 - Inform all employees transitional work program.
6. Request **commitment** from each Elected Official and Department Head to implement a **wage continuation policy** which would give the county the ability to continue paying an injured employee regular wages instead of the injured employee receiving temporary total disability benefits from the BWC – for circumstances where this program would be financially beneficial to the County. This policy would be implemented by the county in situations where an award of temporary total disability benefits to an injured employee would significantly increase the county's workers' comp premium.
 - a. Wage Continuation would be available to an injured employee for a limited period of time, as provided in the county's policy.
 - b. Safety Coordinator/Workers' Comp Coordinator will work with the county's third party administrator (TPA) in communication and

implementation of this policy with County Elected Officials and Department Heads.

Step 4: Communication Requirements

- A. Demonstrate both “top-down” and “bottom-up” **lines of communication**, for example:
1. “Open forum” during meetings of County-wide Safety Committee for employees to voice concerns.
 2. Safety comment box.
 3. Safety topics in employee newsletter or specialized safety newsletter / memo.
 4. Distribute results of periodic safety audits.
 5. Post Safety Committee minutes (see Step 2 (A)).
 6. Request all Elected Officials to encourage individual safety contacts (conversations) between supervisor and employee on specific work practices.
- B. **Respond to employee suggestions** / recommendations on issues concerning accident prevention and request that all Elected Officials do the same.
1. Through newsletter, memo or discuss during safety meetings.
 2. Include implementation steps or procedure changes, if applicable.
 3. If employee’s suggestion cannot be implemented, explore alternatives to address employee’s concern.
- C. Demonstrate written and verbal **communication tools** used throughout the county, for example: distribution of newsletters, safety surveys, bulletin boards, group meetings, individual safety contacts, formal safety training on technical topics, motivational/reminder signs, booklets, posters, etc. Encourage a coordinated safety message among all Elected Officials.

Step 5: Timely Notification of Claims Requirements

- A. Assure that **all lost time claims are reported to the Managed Care Organization** within the time limits required.
1. Commissioners appoint a **central administrator** for all Workers’ Comp claims (possibly the Safety Coordinator or Workers’ Comp Coordinator) to whom all departments report employee injuries.
 2. Elected Officials will report their work related injuries to the SC/WCC.
 3. SC/WCC establishes lines of communication with MCO, service company (TPA), BWC, local hospital and medical providers.
 4. SC/WCC provides all departments with written policy described in Step 3 and training on injury reporting forms and procedures.
 5. Supervisors will report all employee injuries to SC/WCC who will verify that all lost time claims are reported to the MCO within the required time frame.
 6. SC/WCC to follow claim as necessary (in collaboration with supervisor, TPA and

MCO) to verify that employee is receiving appropriate timely treatment and benefits, and to facilitate the employee's return to work. This will include regular communication with the employee, employee's supervisor, the TPA, the MCO, and employee's physician.

Step 6: Safety and Health Process Coordination Requirements

A. **Commissioners designate an individual (Safety Coordinator/Workers' Comp Coordinator)** to facilitate county-wide safety systems and processes. Elected Officials having a safety person working within their department will coordinate efforts with the county-wide SC/WCC.

1. Safety Coordinator does not have **exclusive** responsibility for county-wide safety, but **facilitates and supports** management, supervisors, and employees in developing effective county-wide safety systems and processes among the Elected Officials.
2. **Safety Coordinator's job description** should include the following:
 - assisting Elected Officials, senior management and employees to identify accident prevention and safety training needs,
 - assisting Elected Officials and supervisors to develop strategies or make changes that address safety issues in their department,
 - identifying and communicating new safety and health requirements,
 - compiling injury and illness related reports to identify trends to be addressed by safety training and accident prevention strategies,
 - tracking progress on safety and health related projects throughout the county,
 - working with all Elected Officials and employees to optimize safe work practices.
3. **Safety Coordinator should attend at least one safety and health management seminar per year offered by the BWC Division of Safety and Hygiene or PERRP to meet this requirement.**
 - Information available at 1-800-OHIOBWC and www.ohiobwc.com
 - Individuals in safety positions in **all departments** encouraged to attend **BWC Division of Safety and Hygiene and PERRP training**
 - Recommended that Safety Coordinator join at least one safety related **professional association** (for example: County Loss Control Coordinators Association of Ohio, PRIMA – Ohio) and attend that group's meetings.

Step 7: Employee Orientation and Training Requirements

A. Commissioners to develop a **written safety training process** with specific training objectives and instruction procedures and request that Elected Officials do the same for their department and coordinate with the county-wide Safety Coordinator. Commissioners will do the following and will request that all Elected Officials do the same:

1. Create a **safety orientation** packet for all new employees which includes:
 - the county's safety policy and department-specific policy, if applicable,
 - employee responsibilities,
 - how and when to report injuries,
 - actions to take in case of emergency,
 - how to report unsafe practices or conditions,
 - return-to-work procedures.
2. Ongoing **safety training** process can include training on:
 - hazard communication (as it applies to the work done in the specific department);
 - blood borne pathogens, if applicable;
 - safe work practices and hazard recognition specific to the work being done;
 - safe use of machinery and tools, as applicable;
 - ergonomic risk factors and the prevention of cumulative trauma disorders;
 - chemical hazards specific to the work site and how to prevent contact or exposure;
 - lockout-tagout, hot work permits and confined space entry, if appropriate.
3. **Document** all training to include the date, topic covered, instructor's name and employees attending, signed by each employee attending.

Step 8: Written and Communicated Safe-Work Practices Requirements

Commissioners will do the following and will request all Elected Officials do the same:

- A. Provide employees with written **safe-work practices**.
 1. A general, county-wide "safe-work practices" can be used for a broad category of positions ("general clerical", for example) if the tasks and risks presented are the same.
 2. Safe-work practices can address the following areas, as applicable to the work done and risks presented in each office/department. (If not applicable to a specific department or position, state reasons.)

<ul style="list-style-type: none"> - good housekeeping - personal protective equipment - first-aid procedures - ergonomic principles - respiratory protection - lockout / tag-out procedures - confined space entry - hazard communication - blood borne pathogens - emergency action - powered equipment operation 	<ul style="list-style-type: none"> - hearing conservation - accident analysis - indoor air quality - electrical safety - machine guarding - trenching and excavating safety - safe use of scaffolding - fall protection - preventing workplace violence - preventing slips, trips and falls - safe lifting techniques
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- B. Have employees sign a statement that they have read, understood and will follow the safe-work practices for their position.

C. Department management will review safe -work practices with employees at least annually; continuous review of workplace for development of additional safe-work practices.

Step 9: Written Safety and Health Policy Requirements

A. Written **safety policy** required by Step1, A, 4; and **safe-work practices** required by Step 8, A.

1. Given to all new employees as required by Step 7, A, 1.
2. Provide to all newly elected officials for their review and approval.

Step 10: Record Keeping and Data Analysis Requirements

A. **Compile data on workplace accidents, injuries, illnesses and near-misses.** Use information to develop prevention programs.

1. Potential **sources for data**:
 - Workers' Compensation service company (TPA).
 - Injury / accident reports, investigation into causes of injuries.
 - Investigation of "near misses".
 - PERRP recordkeeping (OSHA recordkeeping).
2. Examples of **information to collect** on each injury / illness or "near miss":
 - Nature of injury / illness, part of body affected.
 - What was employee doing at the time of injury? equipment being used?
 - Elected Official / Department in which accident occurred.
 - What could have been done to prevent the injury?
 - Number of lost work days.
 - Number of days from injury date to date reported to BWC and/or MCO.
3. Possible means of collecting data on **safety processes**:
 - Survey employee/supervisor/manager perceptions of workplace safety.
 - Observe workplace behavior.
 - Perform Job Safety Analysis for specific positions.

B. Use the data collected to **evaluate and improve** safety programs / processes, for example:

1. Identify trends in injury occurrences.
 - Specify hazards and propose solutions.
2. Assess effectiveness of accountability system.
3. Assess the effectiveness of safety communication activities.
4. Assess the effectiveness of safety training processes.