

Changes in OSHA's Hazard Communication Standard

OSHA's Hazard Communication Standard was changed to create a consistent standard recognized worldwide that will reduce misunderstandings in the workplace and increase hazard comprehension. To comply with OSHA's Hazard Communication Standard and the new changes, veterinarians are required to:

- Maintain a list of hazardous chemicals in their practice
- Obtain and maintain Safety Data Sheets (*formerly known as Material Safety Data Sheets*)
- Perform an annual survey of chemicals in the workplace
- Develop and enforce safe handling procedures for hazardous chemical use
- Label hazardous chemicals

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Hazard Communication

Workers have the right to *know* and *understand* the hazardous chemicals they use and how to work with them safely.

www.osha.gov/hazcom 800-321-OSHA (6742) TTY 1-877-889-5627



Workers must be trained to understand these pictograms and the hazards they represent. To learn more about training, labeling, and safety data sheet requirements, scan the QR code.



[pictured: the OSHA wallet card]

BUSINESS INSURANCE



news for you

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www.aahainsurance.org

Total Dividends Now Exceed \$2M

Dividend checks of more than 186K were mailed in January 2014 and December 2013 to participants for workers' compensation policies underwritten by The Hartford (one of our primary carriers) for valuations of two dividend plan years. Dividends are the result of better than expected claims experience and the group buying power of veterinarians in the AAHA Business Insurance Program. Since 2005 when HUB International Midwest Limited was selected as the recommended business insurance broker, more than 2.07M has been returned to program participants.

Individual plan periods begin August 1 and end July 31. Plan periods may have more than one dividend valuation and as a result, dividend checks are mailed at different periods. By law, dividends cannot be declared in advance.



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- Train employees on appropriate handling procedures and exposure response
- Inform contractors working onsite about the hazardous chemicals present
- Maintain appropriate records

What is the Globally Harmonized System?

The Globally Harmonized System is a single set of harmonized criteria provided for classifying chemicals according to their health and physical hazards. OSHA now requires that chemical manufacturers and importers comply with the Globally Harmonized System. Significant changes include:

- OSHA's Hazard Communication Standard defines the testing requirement standards for manufacturers and importers to consistently identify health and physical hazards.
- The Globally Harmonized System requires consistent words and images to identify particular hazards of chemicals manufactured or imported anywhere in the world.
- Safety Data Sheets provided by chemical manufacturers are in a consistent format containing sixteen sections; employers can now easily identify critical information in the SDS.

Expected Benefits

OSHA anticipates many benefits from aligning with the Globally Harmonized System in the Hazard Communication Standard. These expectations include:

- Preventing more than five hundred injuries and illnesses in the workplace each year as well as preventing forty-

three fatalities related to hazardous chemicals.

- A dramatic increase in the consistency of the Hazard Communication Standard when manufacturers and importers use the same pictograms and Safety Data Sheet formats.
- An increase in employee comprehension of hazardous chemicals in the workplace; employees will better understand the chemical dangers and be better prepared in the event of an exposure.
- More efficient access to critical information in the event of an exposure when Safety Data Sheets are in the same format.

Employee Training

The deadline to train your employees (who work with hazardous chemicals) on the Hazard Communication Standard changes was December 1, 2013. If you have not yet trained your employees, please do so now. Training resources are available on OSHA's website at www.osha.gov/dsg/hazcom. Document your employee training program and retain this information for your practice records. In the event of an incident, you may be asked to provide evidence of your employee training.

Additional OSHA Resources

New Hazard Communication Page
www.osha.gov/dsg/hazcom/index.html

GHS and The Purple Book
www.osha.gov/dsg/hazcom/ghs.html#1.0

Benefits of Harmonization
www.osha.gov/dsg/hazcom/ghs.html

Nashville Conference Winner

*Congratulations to
Dr. Lindsay Mamula
from Animal Care
Center of Castle
Pines in Castle
Rock, Colorado for
winning the Beats
Pill™ Portable
Stereo Speaker with
Bluetooth raffle!*

Coverage Spotlight: Flood Insurance

Your practice doesn't need to be in a flood zone to experience a flood, every location is at risk. The National Flood Insurance Program cites thirteen main causes of flooding:

- | | | |
|---------------------|--------------------|------------------------------------|
| 1. Dams | 6. La Nina | 11. Spring Thaw |
| 2. Flash Floods | 7. Levees | 12. Tropical Storms and Hurricanes |
| 3. Flood After Fire | 8. Mudflows | 13. Winter Rainy Season |
| 4. Heavy Rains | 9. New Development | |
| 5. Ice Jams | 10. Snowmelt | |

How many are you susceptible to? Do you have a flood insurance policy? **Physical damage to your property caused by flooding is excluded on all property policies and is only covered when you purchase a separate flood insurance policy.** Please call the AAHA Business Insurance office at 866-380-2242 if you have any questions or if you would like to secure coverage.



Investigate Incidents to Prevent Reoccurrence

What happens at your practice when an employee is injured? What happens if an accident damages your equipment and you can't treat your patients until the damage is fixed?

Accidents can have obvious negative impacts on the practice such as injury or death, damage to equipment, lawsuits, loss of productivity, and low morale; however, you can utilize these incidents to create improvements in safety programs, procedures, and equipment. How? Design and execute a safety program that includes unbiased, prompt, and accurate accident investigations. The purpose of accident investigation is to determine measures that can prevent similar accidents in the future.

Accident reporting facilitates insurance, state and OSHA reporting requirements such as processing a workers' compensation claim or documenting recordable injuries. It goes beyond accident reporting and identifies the cause(s) of an accident to prevent future incidents.

Basic Elements of Accident Investigating

Immediately provide first aid to injured employees and eliminate or control hazards to others. Then preserve the scene, document the conditions, and interview witnesses. All accidents and near misses provide an opportunity for you to discover new ways to improve safety conditions. The best practice is to investigate all accidents and near misses even if they do not result in an injury.

Institute a systematic method to investigate accidents at your practice. Avoid the temptation to quickly assign a cause before uncovering all of the relevant facts.

Use this five-step process to investigate accidents:

1. Investigate the facts
2. Review the facts to find the root cause

3. Implement corrective measures
4. Document findings and actions
5. Follow-up

Try to avoid finding fault with employees for unsafe behaviors. An employee may have committed an unsafe act that can be perceived as a fault, but it is important to investigate the facts and understand why the behavior occurred.

Perform a Root Cause Analysis

It's easy to focus on the direct or obvious cause of the accident; however, the first domino that started the chain of events is the real underlying reason for the accident. To uncover this reason, conduct a root cause analysis.

Consider these three levels when you review the facts:

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- **Direct cause** – The immediate and typically the most obvious cause of the accident.
- **Indirect cause** – Unsafe acts or conditions that we can see that often result in accidents but are not necessarily the root cause.
- **Root cause** – The underlying reason for the accident that we can't see until a thorough investigation identifies the underlying reason.

Correct Actions and Make Changes

The hazard control process to implement corrective actions should include the affected employee(s). The changes may involve these controls:

1. Eliminate the hazard
2. Substitute a less hazardous material or technique
3. Use engineering controls (slip resistant coatings or mats in wet areas, lift tables)
4. Use administrative controls (periodic inspections, job procedures, pre-hire screenings)
5. Personal Protective Equipment (PPE)
6. Training (orientation, safety meetings, reviewing losses)

How Do I Find the Root Cause? Keep Asking 'Why'

Example: A new employee sustained a lower back injury.

- Why? The employee tried to lift a large bag of dog food. (Direct cause)
- Why? The employee was unable to lift the bag from a low shelf up to a cart.
- Why? The employee lifted the large bag of dog food alone. (Indirect cause)
- Why? The employee was unaware about asking for help.
- Why? The practice did not teach the new employee how to properly lift heavy items. (Root cause)

Document your findings of the accident investigation process in an accident investigation report so that the data can be used in future investigations, employee training, and other safety performance improvements at your practice. Your documentation should include direct, indirect, and root causes as well as recommendations to prevent reoccurrence. The documentation should also include the short and long term controls that were implemented to control hazards.

When you incorporate these concepts into your incident investigation protocol you will be more equipped to identify systematic failures and to implement change that will result in sustained improvement in your loss prevention programs.



AAHA Business Insurance Program

Call 866-380-AAHA (2242) today for a coverage evaluation.

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