

Quarterly express

A PUBLICATION OF THE BUILDERS GROUP

SPRING 2011

Protecting our Members
with Safety Awareness



Plan for Safety... Expect Excellence!



plus

Safety in Action:
Recognize Hazards

Doing Business
with the US Army
Corps of Engineers

OSHA Rescinds
Fall Protection
Standards



**BUILT BY THE INDUSTRY
FOR THE INDUSTRY**



Quarterly express

The QUARTERLY EXPRESS is published quarterly by The Builders Group of Minnesota as a free service provided for our Members and contracted agents.

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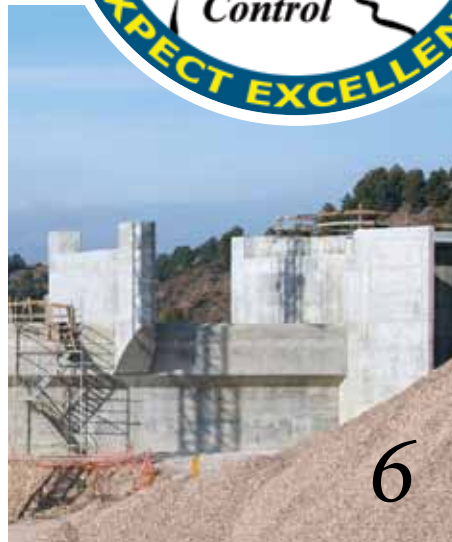


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CEO REPORT

A Brighter Outlook for the Future

THE CONSTRUCTION industry is finally showing some signs of improvement from the “Great Recession.” From lack of available funding for commercial projects, unemployment reaching 50% in some areas, and a mortgage crisis that may take a few more years to become stable again, there is light at the end of the tunnel. There is more optimism this year from the contractors we see at association meetings and conferences. In fact, many are saying they are or will be hiring in 2011, which has not happened for probably three years.

The results we are seeing so far in 2011 indicate that this is true for many Members of The Builders Group. In January the trend of higher payrolls continued with an increase of almost 14% while premiums increased almost 17% over the previous year! The preliminary figures for February indicate the trend is continuing. We have also written nearly \$2 million in new business in the first couple of months this year so we definitely will have positive growth in 2011.

The “Great Recession” has taken a toll on workers’ compensation as well. The reduction in jobs has led to fewer light duty jobs available for an injured worker to return to. This has resulted in claim severity which increased dramatically in 2010 (25% for TBG) even though frequency continues to decline. In addition, investment returns have declined due to the Fed’s decision to keep interest rates historically low to try and spur economic growth. What does this mean? In general, workers’ compensation rates are on an upward trend which will become more prevalent in the second and third quarters of 2011.

As we continue to increase our emphasis on safety, even we have started a new campaign this year with the slogan “Plan for Safety – Expect Excellence.” There is an article on page 5 of this newsletter explaining the program. This is an effort to reduce the claim severity in 2011 and help make TBG profitable. We need everyone to focus on working safe in 2011.

Hopefully your business is also seeing positive indicators for the New Year. I believe when we look back on 2011 it will be the year we turned the corner with profitability, saw job growth in the construction industry, and gained a brighter outlook for the construction industry and for TBG into 2012. Thank you for your business and remember to emphasize working safely on all your projects!



STU THOMPSON, CEO

TBG Welcomes MC&MCA

The Minnesota Concrete & Masonry Contractors Association (MC&MCA) Board of Directors has endorsed a new benefit for all its members – to access The Builders Group Workers’ Compensation program. This benefit is effective immediately.

Formed in 1964, the MC&MCA is a nonprofit trade association comprised of over 100 concrete and masonry contractors and related companies doing business in Minnesota. Today, the MC&MCA is made up of the state’s finest producers and installers of quality concrete and masonry work that offer the expertise and top-shelf craftsmanship to construct anything from a convenience store remodeling project to a 60 story high-rise.

TBG welcomes MC&MCA as an affiliate sponsor of our workers’ comp program for construction-related industry businesses in Minnesota.

MC&MCA is located at 1711 West County Rd B, Suite 207S, Roseville, MN 55113.

TBG Member Referral Program – 2011

Earn a \$10 Gift Card to Holiday Plus gas stations for simply referring a non-TBG Member business to us! That’s right, all you have to do is send us a referral of a construction-related business you work with that has employees and we will send you a \$10 Gas Card for each qualified* referral.

We’ll do the follow-up, all you have to do is provide the name and contact information for each “new” referral. We’ll take it from there. You will also be entered into a Grand Prize drawing at the end of the year just for participating.

Pass along the same great program that you are already benefiting from and allow your favorite subcontractors and suppliers the opportunity to take advantage of all that TBG has to offer!

For additional referral forms, please contact Heather Groff at TBG at 651-203-6795 or email her at hgroff@tbgm.com.

*A QUALIFIED REFERRAL is someone who is not already a TBG Member and one that hasn’t already been submitted to TBG.

NEW TRAINING OPPORTUNITIES

TBG Expands Safety Training/ Demonstration Center

TBG recently completed the construction of a truly one of a kind, trenching, excavating, and confined space training facility at our building in Eagan. This new in-house training room is an expansion of the existing training/demonstration facility already available free to TBG Members.

Currently, hands-on and technical excavation, trenching, and protective system training options are limited industry wide. The hands-on component of excavation safety is noticeably missing from training classes, as compared to most other safety and health topics. Excavation incidents continue to be a major cause of injuries and fatalities nationwide.

The new facility will offer the ability to provide realistic, hands-on, climate controlled trenching, excavating, and confined space training. From simple hazard awareness training to complex Competent Person classes and beyond, this facility will allow participants the freedom to design training to meet their specific needs. Contact your TBG Loss Control Representative for more information about what services are available to you, the new training facility or sign in and look at the TBG Loss Control Training Calendar for upcoming classes at www.tbghmn.com.

TO LEARN MORE, contact your TBG Loss Control Representative, or go to tbghmn.com.

LOSS CONTROL

Take Advantage of TBG Loss Control Member Safety Services and Training!

BY JOHN PRIMOZICH, CSP, ARM – LOSS CONTROL MANAGER

TBG's Loss Control professionals are Construction Specialists and only work with contractors and construction-related businesses. They are dedicated to assisting TBG Members with their Safety and Loss Control efforts and know and understand that safety is a core element when it comes to increasing productivity and controlling costs in a competitive market, with the ultimate end result being employee safety. As a TBG Member, you will work with a Loss Control Representative that is dedicated to supporting your Safety and Loss Control efforts.

VALUE ADDED SERVICES FOR MEMBERS

Customized Safety & Loss Control Programs

- ▶ Employment Practices (Applications, Job Descriptions, Conditional Job Offers, Drug Testing, Physicals, etc.)
- ▶ AWAIR/Safety Programs
- ▶ OSHA Compliance Programs
- ▶ Claims Management/Return-to-Work Programs
- ▶ Site Specific Safety Programs

Website Resources

- ▶ Written Safety Resources to download and customize
- ▶ TBG Member Safety Seminar information
- ▶ Safety Video Lending Library with over 60 titles available in DVD/VHS
- ▶ VIVID Online Learning Systems with over 50 available titles for computer based safety training
- ▶ Safety Vendor/Resource links
- ▶ Safety Recalls/Announcements
- ▶ Loss Control/Member service summary

Hazard Identification & Control

- ▶ Jobsite Safety Surveys
- ▶ Safety and Risk Assessments
- ▶ Mock OSHA Audits

Industrial Hygiene Services

- ▶ Employee Noise Exposure testing
- ▶ Carbon Monoxide (CO) monitoring
- ▶ 4 Gas monitoring
- ▶ Respirator Fit Testing
- ▶ Relationship with MN OSHA Consultation for additional services

Assistance with OSHA Safety Grants

Training Topics include but are not limited to:

- OSHA 10 Hour Construction Safety
- OSHA 30 Hour Construction Safety
- American Heart Association CPR & First Aid
- MN OSHA AWAIR
- Safety Management seminars
- Supervisory Training
- Employment Practices
- Drug Testing
- Return-to-Work Programs
- Fall Protection
- Personal Fall Arrest Systems
- Scaffolding
- Personal Protective Equipment
- Hand and Power Tools
- Machine Guarding
- Excavation/Trenching
- Confined Space
- Electrical Safety
- NFPA 70E – Arc Flash
- Material Handling
- Heavy Equipment
- Hazard Communication/ Employee Right-to-Know
- Ladder Safety
- Walking/Working Surfaces
- Forklift Safety
- Driving/Defensive Driving

Plan for Safety Expect Excellence

BY JOHN PRIMOZICH,
CSP, ARM – LOSS
CONTROL MANAGER

THE BUILDERS GROUP has launched a new safety campaign driven by the slogan *Plan for Safety...Expect Excellence*. It is important to take time to understand what this slogan really means: How you as a business owner can ultimately take control of your safety efforts and put your business in a position to expect excellence and reap the benefits of keeping your employees safe!

Most successful contractors include safety as part of their construction planning process. Others miss the opportunity to prevent injuries and disruptions on their jobsites by treating safety as an isolated function or an add-on. Why wait until an accident happens or an OSHA visit occurs at one of your sites?

Planning and communication are arguably the most important parts of the construction process as a whole. It's through effective planning and communication that the materials, equipment, workers, subcontractors, and all of the involved processes and resources come together to create the finished product.

WHAT DO WE PLAN FOR?

Anything is fair game. No task is too large or too small, when it comes to planning and communication. Items typically planned for are forecasting of losses, safety goals and progress,

timelines related to materials, equipment, employees, subcontractor safety, notices/posters, AWAIR/Safety program effectiveness, hiring practices and drug testing, jobsite signage, emergencies/weather, meeting locations/frequency, material staging areas, hoisting areas, onsite traffic control and parking, material disposal, fire prevention, work at heights, crane operation, and many others.

WHAT ARE THE BENEFITS?

The purpose is to anticipate problems and hazards, define your safety control method(s), implement those controls, and communicate them to everyone on the job. The outcome of pre-planning is a smooth running job with minimal disruptions, hazards, and injuries.

The real benefit is realized when a company recognizes that through continuous enforcement of safety as a core value they can create a culture of safety and accountability where morale is improved, productivity is increased, experience modification is reduced, insurance costs are reduced, and most importantly you have a safe and healthy workforce.



PLAN FOR SAFETY...EXPECT EXCELLENCE

is more than just a slogan. It is a call to TBG Members to take initiative, get actively involved, and control their safety efforts with the end result being excellence. The most important thing an employer can do in their business is ensure

that their employees return home to their

families and friends at the end of a workday in the same condition that they arrived – free from injury and health risks associated with the workplace. By making safety a core value of the company, an employer communicates that they expect EVERYONE to make safety the way of doing business. Making safety the #1 priority sends the message that the company never puts profit in front of people; a fact that should guide all decision making. Make 2011 your year to achieve safety excellence. Contact your TBG Loss Control Representative to get started with a customized plan.

Safety Success

BY WAYNE PETERSON, CSP –
TBG LOSS CONTROL REPRESENTATIVE

TBG recently had two more members in central Minnesota receive MN OSHA safety grants by partnering with TBG Loss Control. TBG Loss Control performed on-site hazard assessments with each member, formulated recommendations and assisted the companies with the process. The members included a general contractor who is now doing more remodeling projects, received funds for a new electrical powered pump jack system and fall protection equipment. The other member is a specialty contractor and manufacturer of solar systems that needed to reduce serious back and shoulder injury exposures. They received funds for hoists, special lifting devices, and ergonomic tools.



Doing Business with USACE

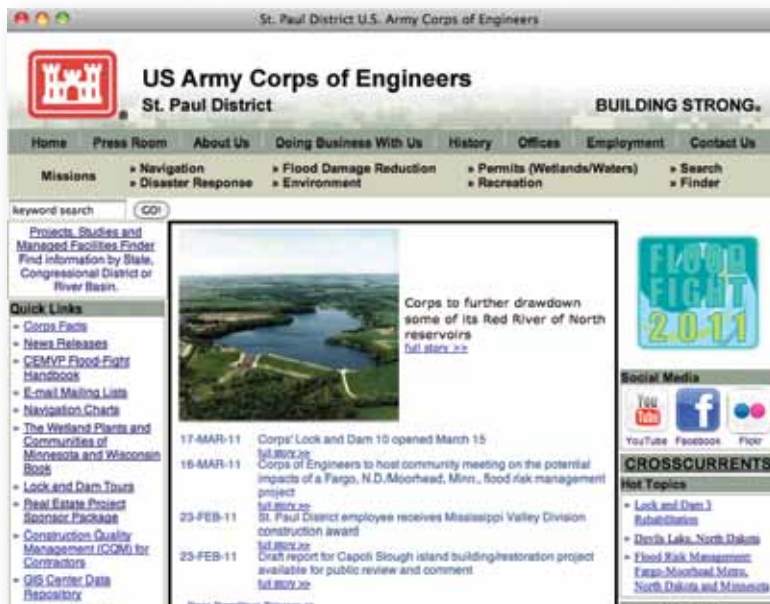
BY WAYNE PETERSON, CSP – LOSS CONTROL REPRESENTATIVE

HAVE YOU NOTICED there are many projects with the US Army Corps of Engineers (USACE) but you have no idea of how to bid on these projects? Or have you looked at these projects and were overwhelmed by the process? The type of work accomplished by each Corps entity is mission-dependent. Some are heavily involved in Civil Works missions (locks, dams, lakes, recreation etc.), some have Military Program missions (barracks, hospitals, other military construction, etc), and some have a combination of both. Most of the projects in our geographical area are managed by the USACE

St. Paul District office. The bidding process is very specific and has a very detailed safety component.

To learn more about all that is involved in the USACE process the TBG Loss Control department recently had a meeting with Barry Simmonds, Safety and Occupational Health Manager of the USACE – St. Paul District.

As you look at the process, there will be a number of abbreviations to work through: USACE, APP, COR, CCR, SSHO and more, but don't be overwhelmed as they are easily explained. This process is very specific as the Corps takes pride in an outstanding safety record which is far below the national average for accidents. The USACE safety record has not happened by accident; it has been achieved by the development and implementation of the safety program over many years. As a contractor, you are a vital part of the program, by providing services in a safe and healthy manner.



LEARN MORE at the US Army Corps of Engineers website. Visit www.mvp.usace.army.mil/

DOING BUSINESS WITH USACE

You do not need to register to research and download contract opportunities with the USACE. Go to the website and search the "Doing Business with Us" page. The US Army Corps of Engineers – St. Paul district website is www.mvp.usace.army.mil/ and the phone number is 651-290-5200.

For further assistance, contact Kevin Henricks at kevin.p.henricks@usace.army.mil or call him at 651-290-5414.

In order to bid on projects, you will need a Data Universal Numbering System (DUNS) number to register as a CCR (Central Contractor

Corps projects can be involved in Civil Works missions like locks or dams, or military construction such as barracks or hospitals.



Registration). For assistance go to www.ccr.gov/ or call 1-888-227-2423.

Once you are awarded a contract you will be assigned a Contractor Officer/Representative from the US Army Corps of Engineers who will work directly with you through the process.

ACCIDENT PREVENTION PLANS – APP

One of the most confusing elements of contracting with the Corps is the development of an Accident Prevent Plan (APP). Most of the contracts require an APP or, for some contracts, an abbreviated APP. The APP is more than a paperwork drill – it is the written document that defines how you are going to manage your safety program during the contract. Where an APP is required, *the APP must be submitted and accepted* by the Corps prior to the performance of any work. You will find that elements within the APP, such as Activity Hazard Analyses (AHA's), will be developed and added to the APP during the contract. The AHA's are based on the specific phases of work and hazards and are developed by referencing the additional sections of the EM as needed.

The Accident Prevention Plan is based on USACE Safety Manual EM 385-1-1. It was first published in 1941, 30 years before OSHA regulations existed and tends to be a bit more stringent than some OSHA standards. This manual is large and 1045 pages in length but an excellent resource. It can be downloaded at http://140.194.76.129/publications/eng-manuals/em385-1-1/2008_English/toc.html

Tips in Completing an APP

- › The Accident Prevention Plan - APP must be site specific.
- › It must be completed in the exact order as detailed by the USACE.
- › No sections can be left blank, if it does not apply simply state that fact.
- › You will need copies of many things such as MSDSs, safety training, and certifications.
- › An Activity Hazard Analysis – AHA shall be completed for each major phase/activity of the work.
- › You will need a Site Safety & Health Officer – SSHO. That position requires an OSHA 30 certification and 5 years of construction industry safety experience or 3 years of experience with a CSP or safety and health degree.

TBG LOSS CONTROL IS AVAILABLE TO ASSIST YOU!

TBG offers OSHA 10 and 30 hour classes periodically. Please check the TBG website for class offerings. TBG Loss Control can also perform specific training for you such as respiratory protection, excavation and nearly all of the topics noted in the Accident Prevention Plan. TBG Loss Control Representatives would also be available to help you write the Accident Prevention Plans or Activity Hazard Analysis.

Also if you have questions before you're awarded a contract, the US Army Corps of Engineers Safety & Health office can be helpful. Contact Barry Simmonds at Barry.W.Simmonds@usace.army.mil or call 651-290-5501.

If you are you interested in attending a workshop on the US Army Corps of Engineers bidding and safety process contact John Primozich at jprimozich@tbgmn.com or call 651-203-6777.

TOP 7 BENEFITS & SERVICES OF BAM MEMBERSHIP

As a member of the builders association you have an advantage. Available to you are opportunities to learn about and improve your marketing techniques and continue educating yourself about our ever-changing industry. Most importantly, you can network with the best residential construction companies in the state; your fellow members.

As a member of your local builders association you are automatically a member of the Builders Association of Minnesota (BAM). BAM offers many benefits and services through membership.

BAM is committed to helping its members make the most of their membership. If you aren't already a member, contact your local builders association. Now is the time to stick together as an industry, and the builders association is here for you. We look forward to seeing you.

1 Workers' Compensation Insurance

The building industry faces unique needs for workers' comp insurance. That's why we're a member of The Builders Group – an insurance company built by the industry, for the industry. Learn more at www.tbgnm.com

2 General Liability and Business Insurance

We found that many available general liability policies offered weak coverage at high rates. That's why we set out to create our own policy that would offer true protection. The Continental Western Group CWGQ program is available only to members, and offers great assistance for risk retention. In addition to general liability, CWGQ offers other policies pertinent to a business in the construction industry. Learn more at www.BAMN.org/CWGQ

3 Legislative Representation

The core of our statewide services is representation at the state legislature. Each year, legislation is introduced that impacts the way you build and how you run your business. We fight measures that would adversely affect your business while proactively introducing our own legislation to help you succeed. Learn more about our recent initiatives online at www.BAMN.org/member/legislation.cfm

4 Code Questions and Interpretation

Minnesota's Building Code is comprised of a number of components, and they are constantly being changed and amended. Association staff and the membership participate in code meetings to ensure reasonable code changes. When changes are introduced, we put together guides that help you and your crews get up to speed quickly. Find guides and code information online at www.BAMN.org/members/codes.cfm

5 Education

Education classes do more than help you meet state licensing requirements. With the right classes you'll be able to grow your business, and BAM works hard to provide curriculum that is pertinent to today's market. See details at www.BAMN.org

6 Networking Events

Each year, we hold a few events that help you network with fellow members from across the state. Take advantage of these events and make new business partners, share advice, and improve your business as a result. Our next event is the 2nd Annual Builders Convention. Find details at www.BAMN.org/Convention

7 Product and Service Discounts

The Builders Association of Minnesota has teamed with various partners to offer you discounts on the products and services you need to run a successful business. Did you know you can save 4.5¢ per gallon of gasoline at Holiday Stationstores? How about special rates and free delivery on office supplies from Office Depot? Or great deals on cell-phone plans through Verizon? Sign-up for these great benefits and many others on the members-only website at www.BAMN.org/members/benefits.cfm.

SAFETY IN ACTION

BY KATIE SCHOFIELD, CSP, ARM, CHST— TBG LOSS CONTROL REPRESENTATIVE



LLOYD'S CONSTRUCTION SERVICES is highly experienced in selective interior demolitions as well as recognizing the hazards that may be present during such operations. During the course of their work, employees sometimes need to operate gas powered equipment inside of buildings. Employees are trained to always have ventilation equipment and fans in these situations to reduce the possibility of the buildup of any hazardous gases. In addition, carbon monoxide detectors are also on site and used in these situations to ensure that the ventilation controls are keeping gas levels safe for employees and any possible building occupants. These safety controls are routine procedures for Lloyd's employees, and they are trained on the dangers of carbon monoxide.

A group of Lloyd's employees was recently working on a jobsite where they were doing some final touch up demo. They were not running any equipment indoors. However, another trade on the site was using a saw for cutting floors and had a small backhoe operating inside the building. Neither the general contractor in control of the site, nor the trade using the gas powered equipment was doing any

type of ventilation, nor did they have a carbon monoxide detector. Lloyd's was the only trade on the site that had a carbon monoxide detector.

After a period of time with the equipment running, although no one was complaining of any symptoms, Lloyd's foreman decided to do a carbon monoxide reading to ensure the safety of his employees, and all the employees on the site. The reading came back in excess of 200 parts per million (ppm) of carbon monoxide. The 8 hour time weighted average for construction is 50 ppm and the short term exposure limit is 200 ppm. For normal adults, 200 ppm is known to cause headache, fatigue, nausea, and dizziness. For anyone with cardiovascular or respiratory issues, 200 ppm can be considerably more dangerous and induce a number of serious or potentially life threatening symptoms. Had testing not been done, levels could have reached very high, and possibly life threatening issues for all people on the site. Lloyd's promptly alerted the other trade that they were producing dangerous levels of carbon monoxide and demanded that they stop what they were doing and begin

using fans to bring levels down to safe amounts. The other trade grudgingly complied and work continued only when levels were safe.

This is a safety success for many reasons. This incident was reported to Lloyd's management directly from an employee who wanted everyone to know what a good job his foreman had done by doing the testing. The Lloyd's employees were trained to recognize hazards, had their safety equipment on site, and used the equipment when they felt necessary, even when they were not responsible for the hazard or creating it. And finally, the foreman took the initiative to look out for everyone on site and also inform another trade of what they had to do to comply and get carbon monoxide levels down. This takes knowledge, confidence, and courage. Any one of these things alone would be a great example of safety in action, but together they are a safety success that needs to be recognized. It is great to see hard work and training and responsibility from all levels of a company come together and pay off in keeping a workplace safe.

THE CARBON MONOXIDE READING came back in excess of 200 ppm. Had testing not been done, levels could've been life threatening.





OSHA Rescinds Fall Protection Standard

BY ADAM TRIPP – TBG LOSS
CONTROL REPRESENTATIVE

The following is a brief outline of OSHA's fall protection standard and what is expected to come out of the recent changes.

IN 1994 OSHA PROMULGATED standard 1926.501(b)(13) stating that all employees working near a six-foot or greater fall exposure need to be protected by some means of conventional fall protection (guardrail system, safety net system, or a personal fall arrest system). If these conventional methods of fall protection created a greater danger to the employee, then they could fall back on a written fall protection plan outlined in 1926.502(k). Under this directive the employer must first prove the infeasibility of conventional

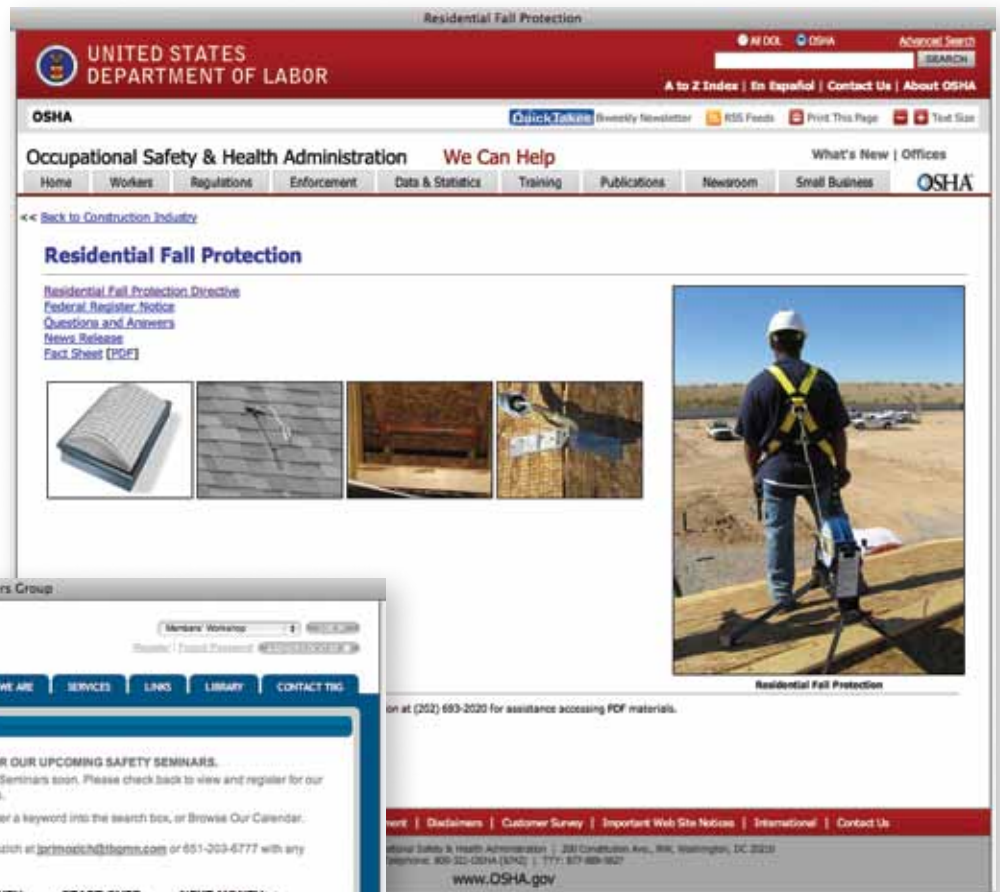
fall protection and then have a qualified person create a site specific written plan complete with alternative methods for protecting exposed employees.

There was considerable push back from the residential construction industry stating that the new standard did not allow for enough flexibility to perform certain tasks in residential construction. What came out of this argument was the Interim Fall Protection Standard in 1995. The Interim Standard allowed the use of alternative methods (slide guards, safety monitor,

controlled access zones, etc.) and did not require the employer to show infeasibility of conventional fall protection methods or that fall protection created a greater danger. The requirement for a written site specific fall protection plan was also eliminated when infeasibility or greater danger were the reasons for not using conventional systems.

In 1999, OSHA created an Advanced Notice that had the purpose of evaluating the success of the Interim Standard. According to OSHA there were significant improvements made

FOR MORE INFORMATION check out the Federal OSHA website at www.osha.gov/doc/residential_fall_protection.html.



on at (202) 693-2020 for assistance accessing PDF materials.

Work | Disclaimers | Customer Survey | Important Web Site Notices | International | Contact Us
 Occupational Safety & Health Administration | 200 Constitution Ave., NW, Washington, DC 20330
 Telephone: 800-321-OSHA (6742) | TTY: 877-684-6827
www.OSHA.gov

FOR TRAINING on Residential Competent Person Fall Protection, as well as other training opportunities, go to www.tbgnm.com/SafetySeminars.asp.



in the type and availability of fall protection equipment which could be used in the field. Since the Advanced Notice was created, high rates of fall-related fatalities and injuries in residential construction remain. This spurred the Advisory Committee on Construction Safety and Health, the National Association of Home Builders, and the Occupational Safety and Health State Plan Association to agree that the Interim Standard was ineffective for preventing accidents. As a result, OSHA rescinded the Interim Standard effective

June 16, 2011. Although this change has not been accepted by MN OSHA as of yet, and since Minnesota has its own state plan, MN OSHA will likely either adopt Federal OSHA's standards or enact regulations which are more stringent. Knowing that change could possibly affect you, it is your responsibility to implement proper compliance. We'll be right there to help you once MN OSHA makes its decision and enforces their interpretation which should happen within 60 days of June 16, 2011. For further information, visit OSHA online

at www.osha.gov/doc/residential_fall_protection.html. There is no reason to be caught off guard by the upcoming changes. Contact your TBG Loss Control Representative to discuss your specific fall exposures and how we can help you implement safer work practices, training for your employees, and aid in writing complete fall protection programs. Also check our website for future Residential Competent Person Fall Protection training, among other training opportunities, at www.tbgnm.com/SafetySeminars.asp.



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SAFETY IDEAS

Voice Mail Safety System

BY KATIE SCHOFIELD, CSP, ARM, CHST-
TBG LOSS CONTROL REPRESENTATIVE

TBG Members are always looking for ways to improve safety and communication at their companies. One of the most difficult areas to get feedback and communication on is near miss reporting and employees praising each other for good safety actions. One TBG Member, Solid Employees, has a great system set up to increase communication.

They have set up a voice mail system that is available through Google Voice. Employees can call in at any time and report unsafe conditions, safety ideas, general site conditions and updates, near miss incidents, and more. The system then transcribes the entire voice mail into text and will email it to the designated person's email account. For unsafe conditions or OSHA concerns, emails could even be forwarded to TBG Loss Control Representatives for attention as

well. The company laminates business cards and has employees keep them in their wallet with the number on it.

The results of the system have been very positive. The crew likes it because they don't have to write anything down or take the time to write anything down. And, no one on the receiving end has to take the time to do the transcription either. All they do is call and talk to the system and it does everything else. Also, it allows greater monitoring and feedback from jobsites and supervisors who may be scattered around the metro, state, or outside of the state.

This idea may be a great option for your company to adopt. The more everyone in the company can talk about safety and then generate feedback and results based upon employees' suggestions and concerns, the

TBG MEMBER, Solid Employees set up a voice mail system that employees can call at any time to report unsafe conditions or safety ideas.



greater the buy in becomes from all involved. It also allows ample opportunity for co-workers to give each other a pat on the back for safe behavior and actions, something that is often overlooked, but very important, in establishing safe habits.

