

March 3, 2014

RE: OSHA's Proposed Improvements to Tracking of Workplace Injuries and Illnesses

OSHA Docket No. 2013-0023 and 2010-0024

Dear Colleague,

As the corporate safety manager of a 2,000 employee global engineering consulting firm specializing in the built environment, I am writing to express my concern about the proposed changes to OSHA's tracking of workplace injuries and illnesses. Safety professionals in the engineering and construction industry would have a difficult time complying with the regulations as they are proposed.

- 1) For firms in our industry, permanent work locations for individuals change from year to year. At any given time, our firm is engaged in hundreds of active projects. Some of these jobs lead to new permanent work locations for a short period of time while construction and engineering work is being carried out at a job site. In many cases we do not know in advance if the site will exist for longer than a year, creating a significant challenge in identifying which of these sites would require quarterly reporting under the revised regulation.
- 2) While some multi-establishment enterprises track time independently for each establishment, our centralized electronic timekeeping tool is used to track hours at multiple locations (~56 office locations in the U.S.). A quarterly reporting requirement would require tracking each employee's time and providing a breakdown of hours for each location where he or she works. Many employees work at multiple locations, including construction site locations, that meet the requirements for permanent establishments. For example, in 2013, while we had 56 office locations, there were an additional 45 construction offices related to specific projects that met the criteria for permanent establishments. OSHA logs were developed for each of those construction offices. Currently, our corporate safety group compiles all of the information required for reporting, including the number of hours worked at each permanent establishment, on an annual basis. The burden to evaluate data on a location by location basis quarterly will be significantly greater, as discussed in more detail in item 3 below. In addition, time keeping reported on a quarterly basis will be more susceptible to errors and could require addendums and corrections throughout the year.
- 3) The proposed rulemaking provided an estimate of the time required for compliance of about 30 minutes per establishment. We believe that OSHA's estimate is unrealistic as applied to our firm and others in our industry. Based on my calculations, if the proposed reporting requirements are implemented, it would take my two-person staff two weeks of full-time work every quarter to comply, and would also require input from our technical staff. That would be more than 160 person hours, four times per year. We believe that this intensive effort is not in alignment with the goals of the Paperwork Reduction Act of 1980.

As safety professionals, we measure the success of programs using leading and lagging indicators. Leading indicators are statistics such as quantity of employees trained, number of observations conducted, and the number of safety audits completed. Lagging indicators relate to injury and illness data. Our safety program focuses on leading indicators to move our program forward and keep our employees safe. It is clear to us that the proposed regulation will take safety staff time away from fulfilling our mission of working safely and preventing workplace injuries.

It is my recommendation that rather than moving forward with the extensive changes noted in OSHA Docket No. 2013-0023 and 2010-0024, that OSHA adopt the changes as noted in Alternative B for Annual Submission under Proposed Sec. 1904.41(a)(1).

Thank you for the opportunity to comment on these proposed changes. If I can provide further information, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Paula J. Loht". The signature is written in a cursive style with a large initial "P" and "L".

Paula J. Loht, CIH, CSP  
Corporate Safety Manager  
Gannett Fleming, Inc.