Safety Compliance Training

By Major Scotty DeClue and Captain Glenn Gamlin

Ask anyone, in any organization, if he or she believes safety is important, and all will agree that it's one of the most important topics in the workplace. One might ask, "If everyone believes safety is so important, why should we perform safety compliance assessments?" The answer is that not everyone fully understands the safety rules or follows the published rules. "*Safety Rules*" are derived from 29 CFR (Code of Federal Regulations). These legal guides provide specifications for safe operations for people using chemicals or electrical and lifting equipment or who are involved with industrial activities.

The 416th Engineers conduct total facilities assessments (TFAs) at U.S. Army Reserve (USAR) facilities across the continental United States and overseas. The TFA includes an Environmental Compliance Assessment, a Facility Safety Assessment, an Energy Assessment, and a Facility Condition Assessment. The following information describes how to design, develop, and implement a Facility Safety Assessment training program for USAR soldiers.

Members of the USAR environmental staff and the 416th Engineers have taught an Environmental Compliance Assessment System (ECAS) training course for several years. As a result of this training, the USAR staff consistently produce high-quality environmental assessment reports, which help us achieve or maintain compliance with numerous environmental laws. Funding for a comparable safety compliance course was not available in 1997, so we developed the Facility Safety Assessment training course to help soldiers identify safety deficiencies.

Common OSHA* Violations



Circuit breakers must be properly labeled.



Electrical outlets within 6 feet of wet areas must have ground fault circuit interupters, as shown at left.



Live electrical equipment operating at 50 volts or more must be enlosed in a metal container.

*** Occupational Safety and Health Administration**

The Program

To prepare the program, we followed the five-step Systematic Approach to Training (SAT) process: Analyze, design, develop, implement, and evaluate.

Analyze. First, we conducted a needs analysis to determine if the training is required and can correct a deficiency. The 416th Engineers designated Safety Assessments as the number 2 priority after Environmental Compliance Assessments. Job and task analyses are part of this step. Conducting a Facility Safety Assessment is within the scope of the Facility Engineer Team, but its safety checklist (provided by the USAR Command [USARC] Safety Office) is only a list of potential impacts at USAR facilities. The checklist does not describe how to evaluate safety items to determine compliance versus noncompliance, nor does it provide a means to take corrective action on items identified as deficiencies. This information is needed to identify and correct safety deficiencies within USAR facilities.

Design. During this step, we wrote the *Facility Safety Assessment Guide*. We reviewed FY96 safety checklists to identify common deficiencies and verify requirements in 29 CFR. Then, using the ECAS format as a guide, we developed a "safety finding sheet." This sheet states the requirement, specific legal references, and information the assessor must check. Deficiencies are listed individually. The format is a significant improvement over the safety checklist because it describes the deficiencies in detail. We used information on the safety findings sheet to develop learning objectives and establish criteria for the performance-based evaluation.

Develop. During visits to several USAR facilities, we took photographs depicting safety deficiencies and prepared slides and overhead transparencies to support class discussions (see photos, page 34). We wrote a lesson plan to identify and correlate deficiencies and to present the training in a logical sequence.

Implement. We scheduled a classroom, coordinated use of a USAR facility for the field training exercise, prepared an agenda, and advertised the course, which has five phases: lecture, practical exercise, field training exercise, report preparation, and findings briefing. Then we conducted a practice session to validate that objectives were met and the level of instruction was appropriate.

Evaluate. The course has been evaluated several times to date, but this step is ongoing. Students evaluate the course at the end of every session to determine strong and weak points and if they feel it prepares them to conduct Facility Safety Assessments. They complete a second survey six months later to determine their retention of course content and if they have experienced difficulty conducting Facility Safety Assessments. The USARC Regional Support Commands, the USARC Safety Office, and USAR facility managers will evaluate the 416th Engineers' Facility Safety Assessments at the end of FY98. By identifying common deficiencies and corrective actions, the 416th intends to publish lessons learned to assist facility managers when they conduct self-assessments to improve their safety posture.

Benefits

We conservatively estimate that our initiative to design, develop, and implement the safety training program saved the 416th Engineers more than $150,000 in FY97. This figure is based on an estimate of current professional consulting rates and the hours we spent developing the course. By having Army Reserve soldiers conduct this training (versus professional consultants), we project annual savings in excess of $100,000. The USARC spent about $30,000 for a 2-day training course in 1996. We plan to conduct four 2-day Facility Safety Assessment training courses in FY99 on drill weekends instead of using annual training days.

The true measure of our success is not whether the 416th Engineers can produce excellent Facility Safety Assessment reports but if, through our efforts, USARC facilities are a *safer* place for soldiers and civilians to work. We believe that base camps in forward areas can use our facility safety assessment format to evaluate their safety compliance programs. The program we developed will reduce the number of noncombat injuries and assist the overall mission accomplishment of any operation.

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