OMB Number: 4040-0004 Expiration Date: 03/31/2012

Application for Federal Assistance SF-424							
* 1. Type of Submission  Preapplication  Application  Changed/Correct		⊠ Ne			Revision, select appropriate letter(s): ther (Specify):		
* 3. Date Received: 07/19/2011		4. Appli	cant Identifier:				
5a. Federal Entity Ident	tifier:			5	5b. Federal Award Identifier:		
State Use Only:				<u>                                     </u>			
6. Date Received by Sta	ate:		7. State Application	Iden	ntifier:		
8. APPLICANT INFOR	RMATION:						
* a. Legal Name: Gra	aphic Communi	cation	s Conference/I	зт		]	
* b. Employer/Taxpayer	r Identification Nun	nber (EIN	J/TIN):	*	* c. Organizational DUNS:	_	
(b) (6)				(	(b) (6)		
d. Address:							
* Street1: 1	.900 L Street	, NW,	Suite 800				
Street2:							
* City:	Jashington						
County/Parish:							
* State:				DC	C: District of Columbia		
Province:							
* Country:					USA: UNITED STATES		
* Zip / Postal Code: 2	20036-5002						
e. Organizational Uni	it:						
Department Name:				D	Division Name:		
f. Name and contact i	information of pe	erson to	be contacted on m	atte	ers involving this application:		
Prefix:			* First Name	e:	Robert	]	
Middle Name:		_				-	
* Last Name: Lace	Y					]	
Suffix:						-	
Title:							
Organizational Affiliation	Organizational Affiliation:						
* Telephone Number: 202-731-0594 Fax Number:							
*Email: rlacey@gciu.org							

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
X: Other (specify)
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
National Union
* 10. Name of Federal Agency:
Occupational Safety and Health Administration
11. Catalog of Federal Domestic Assistance Number:
17.502
CFDA Title:
Occupational Safety and Health_Susan Harwood Training Grants
* 12. Funding Opportunity Number:
SHTG-FY-11-01
* Title:
Susan Harwood Training Grant Program FY 2011
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
GCC Capacity Building Grant: Amputation Hazards
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424							
16. Congressional Districts Of:							
* a. Applicant	DC-001	b. Program/Project us-all					
Attach an additional	Attach an additional list of Program/Project Congressional Districts if needed.						
		Add Attachment Delete Attachment View Attachment					
17. Proposed Project:							
* a. Start Date: 09	9/30/2011	* b. End Date: 09/30/2012					
18. Estimated Fun	ding (\$):						
* a. Federal	20	00,000.00					
* b. Applicant		0.00					
* c. State		0.00					
* d. Local		0.00					
* e. Other		0.00					
* f. Program Income		0.00					
* g. TOTAL	L	00,000.00					
		Under Executive Order 12372 Process?					
		e State under the Executive Order 12372 Process for review on					
_		not been selected by the State for review.					
C. Program is not covered by E.O. 12372.							
		al Debt? (If "Yes," provide explanation in attachment.)					
Yes	⊠ No	al Debt? (If "Yes," provide explanation in attachment.)					
Yes		Add Attachment Delete Attachment View Attachment					
Yes [	☑ No xplanation and attach	Add Attachment Delete Attachment View Attachment					
If "Yes", provide e  21. *By signing the herein are true, of	No  xplanation and attach  is application, I certify (1) to complete and accurate to the	Add Attachment  Delete Attachment  View Attachment  the statements contained in the list of certifications** and (2) that the statements e best of my knowledge. I also provide the required assurances** and agree to					
If "Yes", provide e  21. *By signing therein are true, comply with any re	xplanation and attach  is application, I certify (1) to complete and accurate to the esulting terms if I accept an a	Add Attachment Delete Attachment View Attachment  the statements contained in the list of certifications** and (2) that the statements					
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If "Yes", provide e  21. *By signing the herein are true, comply with any resubject me to crim  ** I AGREE  ** The list of certific specific instructions  Authorized Representations	xplanation and attach  is application, I certify (1) to complete and accurate to the esulting terms if I accept an aninal, civil, or administrative processions and assurances, or an insentative:	Add Attachment  Delete Attachment  View Attachment  Othe statements contained in the list of certifications** and (2) that the statements e best of my knowledge. I also provide the required assurances** and agree to award. I am aware that any false, fictitious, or fraudulent statements or claims may penalties. (U.S. Code, Title 218, Section 1001)  internet site where you may obtain this list, is contained in the announcement or agency					
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If "Yes", provide e  21. *By signing the herein are true, or comply with any resubject me to crim  ** I AGREE  ** The list of certific specific instructions  Authorized Representations  Authorized Representations  ** Last Name: Ura	xplanation and attach  is application, I certify (1) to complete and accurate to the esulting terms if I accept an aninal, civil, or administrative processions and assurances, or an insentative:	Add Attachment  Delete Attachment  View Attachment  Othe statements contained in the list of certifications** and (2) that the statements e best of my knowledge. I also provide the required assurances** and agree to award. I am aware that any false, fictitious, or fraudulent statements or claims may penalties. (U.S. Code, Title 218, Section 1001)  internet site where you may obtain this list, is contained in the announcement or agency					
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If "Yes", provide e  21. *By signing the herein are true, comply with any resubject me to crim  ** I AGREE  ** The list of certific specific instructions  Authorized Representations  Authorized Representations  ** Last Name: Urast Suffix:  * Title: AOR	xplanation and attach  is application, I certify (1) to complete and accurate to the esulting terms if I accept an aninal, civil, or administrative positions and assurances, or an insentative:	Add Attachment  Delete Attachment  View Attachment  Othe statements contained in the list of certifications** and (2) that the statements ee best of my knowledge. I also provide the required assurances** and agree to award. I am aware that any false, fictitious, or fraudulent statements or claims may penalties. (U.S. Code, Title 218, Section 1001)  internet site where you may obtain this list, is contained in the announcement or agency  * First Name:  Jean					

# **BUDGET INFORMATION - Non-Construction Programs**

#### **SECTION A - BUDGET SUMMARY**

	Grant Program Function or	Catalog of Federal Domestic Assistance	Estimated Unobligated Funds		New or Revised Budget			
	Activity (a)	Number (b)	Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)	
1.	Administrative	17.502	\$	\$	\$ 40,134.00		\$ 40,134.00	
2.	Program	17.502			159,866.00		159,866.00	
3.								
4.								
5.	Totals		\$	\$	\$ 200,000.00	\$	\$ 200,000.00	

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#### **SECTION B - BUDGET CATEGORIES**

6. Object Class Categories				GRANT PROGRAM, F	=UN	NCTION OR ACTIVITY		Total
o. Object Glass Gategories	(1)	1	(2)	,	(3)		(4)	(5)
		Administrative		Program				
a. Personnel	\$	9,200.00	\$	5,200.00	\$		\$	\$ 14,400.00
b. Fringe Benefits		5,520.00		3,120.00				8,640.00
c. Travel				38,250.00				38,250.00
d. Equipment								
e. Supplies				1,212.00				1,212.00
f. Contractual		25,414.00		110,584.00				135,998.00
g. Construction								
h. Other				1,500.00				1,500.00
i. Total Direct Charges (sum of 6a-6h)		40,134.00		159,866.00				\$ 200,000.00
j. Indirect Charges								\$
k. TOTALS (sum of 6i and 6j)	\$	40,134.00	\$	159,866.00	\$		\$	\$ 200,000.00
7. Program Income	\$		\$		\$		\$	\$

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SECTION C - NON-FEDERAL RESOURCES								
(a) Grant Program	(k	) Applicant	(c) State		(d) Other Sources		(e)TOTALS	
8. Program	\$		\$		\$		\$	
9.								
10.								
11.								
12. TOTAL (sum of lines 8-11)	\$		\$		\$		\$	
	D - FOR	ECASTED CASH	NE				ı	
Total for 1st Year	1	1st Quarter	  -	2nd Quarter	_	3rd Quarter	_	4th Quarter
13. Federal \$ 200,000.00	\$	50,000.00	\$	50,000.00	\$_	50,000.00	\$_	50,000.00
14. Non-Federal \$								
15. TOTAL (sum of lines 13 and 14) \$ 200,000.00	\$	50,000.00	\$	50,000.00	\$	50,000.00	\$	50,000.00
SECTION E - BUDGET ESTIMATES OF FI	DERAL	FUNDS NEEDED	FO	R BALANCE OF THE	PR	OJECT		
(a) Grant Program				FUTURE FUNDING	PEI			
	1 -	(b)First	<u> </u>	(c) Second		(d) Third	<u> </u>	(e) Fourth
16. Program	\$		\$		\$		\$_	
17.			[					
18.			[					
19.								
20. TOTAL (sum of lines 16 - 19)	\$		\$		\$		\$	
SECTION F - OTHER BUDGET INFORMATION								
21. Direct Charges: 22. Indirect Charges:								
23. Remarks:								

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OMB Approval No.: 4040-0007 Expiration Date: 07/30/2010

#### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

# PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE:

Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- 6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

- Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age: (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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- 9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

- 12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

* SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	* TITLE
Jean urano	AOR
* APPLICANT ORGANIZATION	* DATE SUBMITTED
Graphic Communications Conference/IBT	07/19/2011

Standard Form 424B (Rev. 7-97) Back

#### **Combined Assurance**

Applicants should refer to the regulations cited below to determine the certification to which they are required to attest. Applicants should also review the instructions for certification included in the regulations before completing this form. Signature of this form provides for compliance with certification requirements under 34 CFR Part 82, "New Restrictions on Lobbying," and 34 CFR Part 85, "Government-wide Debarment and Suspension (Nonprocurement) and Government-wide Requirements for Drug-Free Workplace (Grants)." The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Agency determines to award the covered transaction, grant, or cooperative agreement.

#### 1. LOBBYING

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 34 CFR Part 82, for persons entering into a grant or cooperative agreement over \$100,000, as defined at 34 CFR Part 82, Sections 82.105 and 82.110, the applicant certifies that:

- (a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making of any Federal grant, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal grant or cooperative agreement;
- (b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal grant or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;
- (c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subgrants, contracts under grants and cooperative agreements, and subcontracts) and that all subrecipients shall certify and disclose accordingly.

# 2. DEBARMENT, SUSPENSION, AND OTHER RESPONSIBILITY MATTERS

As required by Executive Order 12549, Debarment and Suspension, and implemented at 34 CFR Part 85, for prospective participants in primary covered transactions, as defined at 34 CFR Part 85, Sections 85.105 and 85.110 --

- A. The applicant certifies that it and its principals:
- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
- (b) Have not within a three-year period preceding this application been convicted of or had a civil judgement rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (2)(b) of this certification; and

- d) Have not within a three-year period preceding this application had one or more public transaction (Federal, State, or local) terminated for cause or default; and
- B. Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.

Add Attachment	Delete Attachment	View Attachment

# 3. DRUG-FREE WORKPLACE (GRANTEES OTHER THAN INDIVIDUALS)

As required by the Drug-Free Workplace Act of 1988, and implemented at 34 CFR Part 85, Subpart F, for grantees, as defined at 34 CFR Part 85, Sections 85.605 and 85.610 --

- A. The applicant certifies that it will or will continue to provide a drug-free workplace by:
- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an on-going drug-free awareness program to inform employees about:
- (1) The dangers of drug abuse in the workplace;
- (2) The grantee's policy of maintaining a drug-free workplace;
- (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
- (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will:
- (1) Abide by the terms of the statement; and
- (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency, in writing, within 10 calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to the address provided in the application instructions. Notice shall include the identification number(s) of each affected grant;

- (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted:
- (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
- (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).
- B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific

code)

identified here.

\* Address

Place	of I	Perforr	nance	(Street	address,	city,	county,	state,	zip
						-	•		

1900 L Street, NW, Suite 800	
* City	_
Washington	
County	
* State	Zip
DC: District of Columbia	55
Check if there are workplaces on file that are not	

DRUG-FREE WORKPLACE

and

(GRANTEES WHO ARE INDIVIDUALS)

As required by the Drug-Free Workplace Act of 1988, and

defined at 34 CFR Part 85, Sections 85.605 and 85.610 --

implemented at 34 CFR Part 85, Subpart F, for grantees, as

A. As a condition of the grant, I certify that I will not engage in the

unlawful manufacture, distribution, dispensing, possession, or use

of a controlled substance in conducting any activity with the grant;

B. If convicted of a criminal drug offense resulting from a violation

occurring during the conduct of any grant activity, I will report the conviction, in writing, within 10 calendar days of the conviction, to

the address provided in the application instructions. Notice shall

include the identification number(s) of each affected grant.

As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the above certifications.

* NAME OF APPLICANT						
Graphic Communications Conference/IBT						
* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE						
Prefix: * First Name: Jean						
Middle Name:						
* Last Name: Urano	Suffix:					
* Title: AOR						
SIGNATURE DATE						
Jean urano 07/19/20	11					

ED 80-0013 12/98

# **Survey on Ensuring Equal Opportunity For Applicants**

OMB No. 1890-0014 Exp. 2/28/2009

#### Purpose:

The Federal government is committed to ensuring that all qualified applicants, small or large, non-religious or faith-based, have an equal opportunity to compete for Federal funding. In order for us to better understand the population of applicants for Federal funds, we are asking nonprofit private organizations (not including private universities) to fill out this survey.

Upon receipt, the survey will be separated from the application. Information provided on the survey will not be considered in any way in making funding decisions and will not be included in the Federal grants database. While your help in this data collection process is greatly appreciated, completion of this survey is voluntary.

## Instructions for Submitting the Survey

If you are applying using a hard copy application, please place the completed survey in an envelope labeled "Applicant Survey." Seal the envelope and include it along with your application package. If you are applying electronically, please submit this survey along with your application.

Applicant's (Organization) Name: Graphic Communications Conference/IBT						
Applicant's DUNS Name: (b) (6)						
Federal Program: Susan Harwood Training Grant Pro	Federal Program: Susan Harwood Training Grant Program FY 2011					
CFDA Number: (b) (6)						
Has the applicant ever received a grant or contract from the Federal government?	5. Is the applicant a local affiliate of a national organization?					
⊠ Yes □ No	⊠ Yes □ No					
Is the applicant a faith-based organization?	<ol><li>How many full-time equivalent employees does the applicant have? (Check only one box).</li></ol>					
☐ Yes ⊠ No	<ul><li>☐ 3 or Fewer</li><li>☐ 15-50</li><li>☐ 4-5</li><li>∑ 51-100</li></ul>					
3. Is the applicant a secular organization?	☐ 6-14 ☐ over 100					
☐ Yes ⊠ No	7. What is the size of the applicant's annual budget? (Check only one box.)					
4. Does the applicant have 501(c)(3) status?	Less Than \$150,000					
⊠ Yes	<b>\$150,000 - \$299,999</b>					
∑ les ☐ No	\$300,000 - \$499,999					
	\$500,000 - \$999,999					
	<b>\$1,000,000 - \$4,999,999</b>					
	\$5,000,000 or more					

# **Survey Instructions on Ensuring Equal Opportunity for Applicants**

OMB No. 1890-0014 Exp. 2/28/2009

Provide the applicant's (organization) name and DUNS number and the grant name and CFDA number.

- 1. Self-explanatory.
- 2. Self-identify.
- 3. Self-identify.
- 501(c)(3) status is a legal designation provided on application to the Internal Revenue Service by eligible organizations. Some grant programs may require nonprofit applicants to have 501(c)(3) status. Other grant programs do not.
- 5. Self-explanatory.
- 6. For example, two part-time employees who each work half-time equal one full-time equivalent employee. If the applicant is a local affiliate of a national organization, the responses to survey questions 2 and 3 should reflect the staff and budget size of the local affiliate.
- Annual budget means the amount of money your organization spends each year on all of its activities.

#### **Paperwork Burden Statement**

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this

information collection is 1890-0014. The time required

to complete this information collection is estimated to average five (5) minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.

If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: The Agency Contact listed in this grant application package.

#### **Program Summary**

## **Applicant Organization:**

Graphic Communication Conference- International Brotherhood of Teamsters (GCC/IBT)

## **Project Director:**

Paul Renner, Project Director 52 Duane Street, 7<sup>th</sup> Floor New York, NY 10007 paullabor@iswe-pcr.org

# **Certifying Representative:**

Robert Lacey Secretary Treasurer, GCC-IBT 1900 L Street, NW, Suite 800 Washington, D.C. 20036-5002 202-721-0594

#### **Funding Requested:**

\$200,000

#### **Grant Category:**

Susan Harwood Capacity Building Grant Program SHTG-FY-11-01

#### **Grant Topic:**

**Amputation Hazards** 

# **Program Summary:**

The Graphic Communications Conference of the International Brotherhood of Teamsters – GCC/IBT- (formerly the Graphic Communications International Union) represents 51,206 printing and paper trades workers in every state in the union. The Teamsters Union is the largest private sector union in North America with 1.4 million members and 1,900 local affiliates. GCC has contracts with 2700 employers. Of these, 2650 have fewer than 250 employees. The average size of GCC-represented shops is 20-30 employees. Our workers currently face enormous risks because of the failed H&S programs now in use in many of our workplaces. GCC workers face far too many incidents, accidents, injuries and lost workdays. We wish to replace the hodge-podge of the current inadequate H&S efforts in our industry with systematic joint worker-employer H&S programs.

This program will build "Centers of Competency" in the GCC by training workers and managers how to apply the principles of "Systems of Safety" (SOS, a practical application of OSHA's Hierarchy of Controls) to existing H&S programs at GCC work places. Systems of Systems are universal; they exist at all worksites. They consist of preventative maintenance systems, procedures systems, mitigation systems, alarms and warning systems, and design and engineering systems. Workers and employers will be trained together on how to recognize H&S hazards using SOS concepts, as well as how to remediate those hazards at the highest level of prevention attainable. Through the use and application of these time-tested principles, we fully expect workers and managers trained in our programs to uncover hundreds of previously unidentified flawed safety systems. We call these latent systems failures or "traps" just waiting

to be sprung, given the right conditions or set of circumstances. By sharing a common "systems" view and a common "systems" language, workers and managers will be able to make sense out of the overlapping and inconsistence H&S programs that now exist at most of our workplaces. Most importantly, we provide these teams of workers and managers with this common language, an overarching philosophy, and set of skills they can use collectively to abate hundreds of previously unrecognized or unremediated hazards.

## We propose to:

The GCC/ISWE plan is to build Centers of Competency within the GCC regions with known amputation problems. We will:

- 1. Design, conduct, analyze, and summarize a GCC H&S needs assessment.
- 2. Review the current list of worker trainers, replace non-active trainers, recruit replacement trainers, and train and support **20 GCC worker-trainers**.
- 3. Pilot test and review **all workbooks** that will be used to train GCC workers as trainers and obtain OSHA Technical Review approval, if changes are necessary.
- Create and print an industry-specific SOS Amputation Hazards Awareness workbook, which reviews and emphasizes the *Machinery and Machine Guarding*:29 CFR Part 1910, Subpart O and *Control of Hazardous Energy (Lockout/Tagout)*:29 CFR 1910.147<sup>1</sup> <a href="http://www.osha.gov/Publications/osha3170.pdf">http://www.osha.gov/Publications/osha3170.pdf</a>).
- 5. **Train 705 workers, supervisors, and managers** during the first grant year (see chart at C.
  - a. **Train 20 GCC workers** to be Small Group Activity Method trainers
  - b. **Mentor 20 part-time** GCC worker trainers.
  - c. **Train 250 workers, supervisors, and managers** at 10 off-worksite union-hall workshops or at on-site workshops in SOS Awareness trainings in 15 targeted trainings..
  - d. **Train 125 workers, supervisors, and managers** on SOS Amputation Hazards Awareness training in a total 5 targeted trainings.
  - e. Train 240 GCC rank and file leaders at four Regional GCC Conferences.
  - f. Contact at least 50 persons for needs assessment survey
- 6. Provide for technical support for both Industrial Hygiene issues and SOS concept implementation and application.
- 7. Conduct evaluation:
  - During the workshops: We use workbook tear-out evaluation sheets so that participants can evaluate each training module.
  - After the workshops: We will record the impact of the training on H&S culture through follow-up interviews

Our training targets, where we will recruit the worker and manager trainees, will be:

- Workplaces where amputation hazards are present. (amputations are a major hazard in our industries.)
- The 8,100 **GCC shop stewards** who are in position to work with management to encourage on-site, on-the-clock training.

<sup>1</sup> http://www.osha.gov/Publications/osha3170.pdf

#### I. Problem Statement/Need for Funds

#### Introduction

The Graphic Communications Conference of the International Brotherhood of Teamsters (GCC/IBT - formerly the Graphic Communications International Union) represents 51,206 printing and paper trades workers in every state in the union. The GCC/IBT is applying for a Susan Harwood Capacity Building Developmental grant to reach at-risk workers in the printing and paper industries. Our fundamental purpose is to bring a systematic health and safety (H&S) program to an industry in which most employers are small and have no such approach to health and safety.

Our workers currently face enormous risks because of the failed H&S programs in use in many of our workplaces. GCC workers face far too many incidents, accidents, injuries, and lost workdays. We wish to replace the hodge-podge of the current inadequate H&S efforts in our industry with systematic joint worker-employer H&S programs.

This program will build "Centers of Competency" in the GCC by training workers and managers how to apply the principles of "Systems of Safety" (SOS, a practical application of OSHA's Hierarchy of Controls) to existing H&S programs at GCC work places. Systems of Systems are universal; they exist at all worksites. Systems of Systems consist of preventative maintenance systems, procedures systems, mitigation systems, alarms and warning systems, and design and engineering systems. Workers and employers will be trained together on how to recognize H&S hazards using SOS concepts as well as how to remediate those hazards at the highest level of prevention attainable. Through the use and application of these time-tested principles, we fully expect workers and managers trained in our programs to uncover hundreds of previously unidentified flawed safety systems. We call these latent systems failures or "traps" just waiting to be sprung, given the right conditions or set of circumstances. By sharing a common "systems" view and a common "systems" language, workers and managers will be able to make sense out of the overlapping and inconsistent H&S programs that now exist at most workplaces.

Our workers need such programs as soon as possible because they are at significant risk:

- Many have lost fingers and hands in fast-moving equipment;
- Many are vulnerable workers, new hires, recent immigrants, and non-English speaking workers who receive little or no health and safety training;
- Many are in workplaces with inadequate health and safety programs or no programs at all; and
- Many of our workplaces are on the OSHA high-hazard worksite list.

#### **Strategic Aims**

The GCC Grant will 1) develop and sustain Centers of Competency; 2) conduct a needs assessment of the H&S issues faced by our members and their employers; and 3) develop H&S training to do the following:

- Institute a campaign using Systems of Safety (SOS) training to eliminate amputation hazards and abate them, where elimination is not possible or practical;
- Provide 10 General (SOS) awareness workshops for 300 workers and managers;
- Provide training on Amputation Hazards for 100 workers through 5 workshops on how to eliminate amputation hazards using an SOS approach;
- Provide workshops for 200 local GCC elected leaders by conducting training at four regional GCC conferences;
- Select worker and manager H&S activists and/or joint H&S committees from eight GCC Regions to apply SOS strategies to make concrete workplace H&S changes as well as build a strong H&S culture within their workplaces;
- Institute campaigns that target the elimination and mitigation of amputations and crushing hazards;
- Provide technical support for the implementation of SOS strategies at worksites as well as create a union-wide program to provide industrial hygiene support for local unions to facilitate select GCC region's capacity to become true Centers of Competency
- Integrate workers' rights and employers responsibilities under OSHA in all training;
- Change the H&S culture in the GCC-represented facilities so that they develop a preventive approach to H&S problems based on SOS; and
- Conduct an evaluation to assess the impact of our training program on H&S culture;

## 1. Systems of Safety (SOS) Capacity Building

The dominant corporate safety culture is not a culture. Rather, it is a series of safety programs introduced by different management teams, one after the other, to help workers and management recognize, avoid, and abate hazards. In most cases, each program is presented as the "magic bullet" that will reduce and/or eliminate accidents and injuries. Unfortunately, there is little understanding about how these programs interact with other site systems, in large part because there is so little understanding of the site safety systems that exist. This hodge-podge of safety programs means that workers and management have no common language, shared vision, or practical application to use concepts like OSHA's hierarchy of controls.

Although the dominant management safety culture is incredibly fragmented, the various "magic bullets" are effective to some degree and appear to meet minimal legal requirements. Our objective, however, is to go beyond those minimal requirements. Instead, we intend to foster a cooperative and coherent approach to H&S that engages both management and workers by building a common framework, a common vision, and a common language that facilitates a culture of prevention. "Systems of Safety" (SOS) is the foundation we will use in our training program to build such a common culture among workers and managers.<sup>1</sup>

Centers of Competency - This grant will focus on building Centers of Competency, which we define as local union and management safety groups or committees in GCC regions with known amputation and crushing problems. These groups and committees will learn to implement a systematic program of hazard identification, elimination, and abatement based on SOS. We will offer SOS awareness training for the entire population of GCC-represented workers and their managers. These committees comprise the Centers of Competency. The Institute for Sustainable Work & Environment (ISWE) project will provide technical Systems of Safety support and guidance to the Centers of Competency, to the facilities and to Union members as they identify and remediate site hazards.

We propose to build our internal capacity to help our local unions and their employers develop Centers for Competency over the next four years. We fully expect this effort to build long-term labor and management cooperation and to dramatically improve H&S at our facilities.

Clearly, we have much work to do, and we hope that this proposed grant can provide the resources to provide the much needed training on topics important to our members, and to develop sustainable Centers for Competency to provide support to our members. In the end our goal is to have developed ongoing, self-sufficient programs with our employers improving the culture of safety at work.

## **Target Populations**

A large number of Graphic Communications workers are in harm's way.

<sup>&</sup>lt;sup>1</sup> See appendix for a expanded "Health and Safety Programs Structural Disharmony"

- The GCC represents approximately 50,000 workers in **50 states**.
- Eighty percent of the union's members are engaged in **printing trades** and 20% work in paper-related industries, where they often do printing-related work.
- Many GCC workers are young, immigrant, and limited English speakers (Spanish as primary language).
- GCC has contracts with 2700 employers. Of these, **2650 have fewer than 250** employees. The average size of a GCC-represented shop is 20-30 employees. There are 8100 GCC shop stewards.

#### **Tackling the Amputation Hazards Crisis**

Amputation is a known hazard in our industry and destroys the lives of too many of the workers we represent. We are living proof for why the risk of amputation is part of OSHA's National Emphasis Plan (NEP) <sup>2</sup>, and why it is a well-known problem in GCC-related industry publications. A recent publication of Printing Industries of America states:

"The most recent incident at a printing company in California where a guillotine operator cut off his hand is a gruesome reminder that working with printing equipment requires a special focus on safety. Unfortunately, the printing industry has earned a dubious distinction and is now considered one of the most hazardous industries to work in as it pertains to amputations."

It is critical that the GCC campaign to stop these horrific injuries in the workplace, as it is obvious that Industry is unable, and has failed. Now is the time to institute training for the rank and file health and safety activists, and company health and safety personnel that will provide a Systems of Safety framework to identify acute and latent amputation hazards within GCC industries emphasizing strategies for their elimination. These campaigns, and this training will force employers to take their responsibilities seriously and provide the resources for the elimination or strong abatement of these amputation hazards. Our training and technical assistance will lay out ways to engage OSHA in forcing recalcitrant employers to do the right thing.

This publication from the Printing Industries of America also informs its members that:

"Rescinding the Enhanced Enforcement Program (EEP) and replacing it with the Severe Violator Enforcement Program (SVEP). OSHA has replaced the EEP with the SVEP to increase its enforcement efforts against employers who have demonstrated an "indifference" to workplace safety obligations including situations that result in fatalities or catastrophic events and industries that expose employees to the most severe hazards, including those identified as "high-emphasis hazards." Due to the persistent high level of amputations, the printing industry has been classified as a high hazard industry and any printer receiving a citation could be subject to the SVEP." <sup>3</sup>

<sup>&</sup>lt;sup>2</sup> OSHA's National and Special Emphasis Program Index

<sup>&</sup>lt;sup>3</sup>Alert: OSHA Steps Up Enforcements | Printing Industries of America - Printing.org

It is blatantly obvious that our industry has been unable to stop these horrific injuries. It is also blatantly obvious that OSHA must step in to end this epidemic. We believe this OSHA-supported training effort, geared toward building H&S awareness and activism among our members and managers, will not only help prevent incidents that lead to amputations, but will also help employers abide by the letter and the spirit of OSHA's rules and regulations.

## How our training can make a difference:

ISWE staff each have **over** 20 years of experience conceptualizing, writing, pilot testing, and refining H&S materials and delivering training for OSHA grants. The staff brings valuable experience in developing, implementing, and evaluating SOS-based H&S training programs in which local union leaders become worker trainers, who in turn train workers and managers. We believe that a partnership with the ISWE staff will enable us to provide crucial training and technical support to our members.

It is highly unlikely that the average GCC-represented facility, a small business can devote sufficient resources to provide this kind of training. This Susan B. Harwood Capacity Building Developmental grant could make a significant contribution to preventing amputations and other workplace accidents among GCC workers by funding the development and delivery of high quality, systematic training based on SOS.

Our proposed training includes: hazard identification, particularly as these hazards relate to amputation; how to apply OSHA's Hierarchy of Controls through the use of SOS to address and fix workplace hazards; and using root cause techniques and tools. In addition, each of these programs will also include the applicable OSHA standards for prevention of workplace incidents and accidents.

Most companies have hazard identification and reporting programs but our experience, based on conversations with our members, is that they are afraid to report hazards for a variety of reasons, including: fear of discipline or loosing one's job, difficult-to use reporting systems, fear of informal retaliation from supervisors and management, the expectation (based on experience) that hazards will not be fixed as well as the reality that many hazards are simply accepted as a normal course of work. In other words, our members believe

that there is nothing to be done about the hazards they encounter at work. We call this "normalization of hazards."

We believe that by offering a union-led, industry-supported H&S program based on SOS to both workers and managers, we will not only raise their awareness of workplace hazards, but also provide a common language to discuss these hazards. In our experience, this can help improve communication between workers and managers and provide a crucial first step toward dissolving the barriers our members face when reporting hazards.

We also believe that our training will enable every worker to conduct effective workplace inspections of his or her work area. While our proposed training program cannot equip workers and supervisors with the authority to implement prompt corrective measures, we can provide every trainee with the skills and tools to *identify hazards and conditions, especially those* that expose workers to acute or latent amputation hazards.

The long-term goal of our program is to assist workers and managers in identifying "root causes" and in making recommendations for fixes based in OSHA's Hierarchy of Controls, as applied through SOS. This training will help workers make recommendations for prioritizing fixes and scheduling maintenance appropriate to the hazards identified. Our program will encourage companies to create systems to communicate to workers and managers the actions taken to follow-up on identified hazards. This is a vital link if the program is to be seen as credible by shop floor workers.

We will work closely with Region III OSHA to provide technical reviews and approval for our workbooks.

# II. Administrative and Program Capability

## A. The Graphic Communications Conference (GCC) of the International Brotherhood of Teamsters

The Graphic Communications Conference (GCC) was established January 1, 2005, with the merger of the Graphic Communications International Union (GCIU) with the International Brotherhood of Teamsters (IBT). The GCC headquartered in Washington, DC, (in the former GCIU location) is a trade union representing 51,206 workers in 50 states presently employed in the printing and related paper trades. The union, the product

of mergers of printing trades unions dating back to the mid-nineteenth century, now represents workers who print newspapers, periodicals, books, commercial materials, manifold business forms, medical packaging, and greeting cards. Our members also do bookbinding, typesetting, plate making, packaging and wrapping, boxboard, and other specialty work. GCC is governed by a president, secretary-treasurer, two international vice-presidents, and a General Board composed of representatives from each of the union's regions, (see attached organizational chart). The union has 317 local unions and 8,100 shop stewards. It has contracts with 2700 employers.

Robert Lacey, GCC Secretary Treasurer, is the principal officer in charge of health and safety. He will bear program responsibility for the grant and financial administration. Ayesha Wright, CPA, the director of accounting in the secretary-treasurer's office will take day-to-day responsibility for grant record keeping, disbursement of grant funds, and compliance with all required financial reports.

In the past 16 years, the GCC has administered the following grants:

Name	Funding Source	Dates	Amount
H&S Training for Printers	NYS OSH Hazard Abatement Board	1/95-12/95	\$55,000
H&S Training for Printers	NYS OSH Hazard Abatement Board	1/96-12/96	\$55,000
Dispute Resolution	Federal Mediation and Conciliation Service	10/96-3/98	\$70,530
H&S Training for Printers	NYS OSH Hazard Abatement Board	7/97-6/98	\$55,000
H&S Training for Printers	NYS OSH Hazard Abatement Board	8/98-7/99	\$37,714
OSHA through GCIU	OSHA Susan Harwood, Institutional Competency.	9/00-8/01	\$164,040
OSHA through GCIU	OSHA Susan Harwood, Institutional Competency.	10/01-9/02	\$131,825
OSHA through GCIU	OSHA Susan Harwood, Institutional Competency.	10/02-9/03	\$131,825
OSHA through GCIU	OSHA Susan Harwood, Institutional Competency.	10/03-9/04	\$141,000
OSHA through GCIU	OSHA Susan Harwood, Institutional Competency.	10/04-9/05	\$140,084
OSHA through GCIU	OSHA Susan Harwood, Institutional Competency.	10/05-9/06	\$140,084
OSHA through GCIU	OSHA Susan Harwood, Institutional Competency, PIT	10/06-9/07	\$140,084
OSHA through GCC/IBT	OSHA Susan Harwood, Institutional Competency ., PIT	10/07-10/08	\$117, 814
OSHA through GCC/IBT	OSHA Susan Harwood, Institutional Competency ., PIT	04/09-03/10	\$118,113
OSHA through GCC/IBT	OSHA Susan Harwood, Material Handling including Cranes, Hazardous Materials and Slings.	10/10-09/11	\$270,331
OSHA through GCC/IBT	OSHA Susan Harwood, Institutional Competency.	04/10-03/11	No Cost Extension

#### B. Joe Anderson and Paul Renner; Senior Project Directors of ISWE

The Institute for Sustainable Work & Environment (ISWE) formally the Public Health Institute with offices in New York, New Jersey, and Colorado, is a non-profit, 501(c) (3) founded in 1976. Its principal mission is to design educational programs for unions and community groups on health and safety, the environment, and economics. As senior project directors, Joe Anderson and Paul Renner have designed and instituted education programs for hundreds of unions and community organizations, including the former Oil, Chemical and Atomic Workers Union (OCAW), Paper, Allied-Industrial, Chemical and Energy Workers Union (PACE), the United Steelworkers Union (USW), the Utility Workers of America (UWUA) the United Automobile Workers (UAW), the Service Employees International Union (SEIU), and the Communications Workers of America (CWA).

Since 1987, Anderson and Renner have helped the OCAW/PACE/USW develop and institute a model health and safety program based on worker-trainers. They have directed the major sub-grants on the OCAW/PACE/USW National Institute for Environmental Health Sciences (NIEHS) Hazardous Waste Worker Training Program. During that time they have designed 60 health and safety workbooks for oil, chemical, atomic, pharmaceutical, and paper workers.

#### In addition, during the last 20 years, Anderson and Renner have:

- Written, designed, and published training workbooks used by worker-trainers for four OCAW/PACE
  Susan Harwood Institutional Development grants. The grant workbooks were on Process Safety
  Management, Catastrophic Accident Prevention, and Incident Investigation, and Whistleblower
  Protection. In the last five years, the Institute designed and published training workbooks used by
  worker-trainers for a seven-year GCIU (GCC/IBT) Susan Harwood Institutional Development grant, and
  three, two-year UWUA Susan Harwood Targeted Training Grants.
- Collaborated with the Communications Workers of America, District 1, to design a workbook, slide show, poster and train-the-trainer program under a New Jersey State Health and Safety Training grant on Repetitive Stress Injuries that reached over 10,000 public sector workers.
- Designed, illustrated, and produced a 519-page health and safety workbook for the Rutgers/New Jersey Industrial Union Occupational Health and Safety Education Program. For that program, the Institute provided train-the-trainer sessions for over 100 worker-trainers, who in turn, conducted over 10,000 hours of training, reaching more than 1,000 participants that year.
- Received funding from the New York State Occupational Safety and Health Hazard Abatement Board to
  produce health and safety manuals and videos on Repetitive Stress Injuries and Workplace Violence
  Prevention.

(See chart in appendix for list of federal and state grants received since 1995 managed by Anderson and/or Renner)

## **II. Program Experience**

For each of the training projects listed in the table above, Anderson and Renner have trained trainers, mentored these trainers, conducted refresher courses, written curricula for each project, and worked with our partners on training outreach, quality control, evaluation, and grant administration. Their combined experience and accomplishments on both NIEHS and OSHA grants include the following:

- In the NIEHS EPA grants (2000-2009), Anderson and Renner trained over 75 worker-trainers who conducted workshops that reached 40,000 workers and managers.
- In the NIEHS DOE grants (2000-2009), they also trained over 50 worker-trainers who conducted workshops to reach 15,000 workers and managers. In addition, Anderson and Renner provided quality control and evaluation services for both the EPA and DOE NIEHS grants.
- They have written, designed and published training workbooks used by worker-trainers for five OCAW/PACE/USW/GCC Susan Harwood Institutional Competency Development grants received by OCAW/PACE/USW/GCC.
- They have written, designed and published training workbooks used by worker-trainers for three UWUA Susan Harwood Institutional Competency Development grants received by the UWUA; Recognition and Avoidance of Electric Hazards; Emergency Preparedness and Response, and Disaster Response and Recovery and Excavation and Trenching.
- Trained an additional 1131 workers and managers in year 2004-2005 and 547 in year 2005-2006 through the GCC OSHA Harwood Institutional Competency Building.
- Trained 628 workers and their supervisors in the 2004-2005 grant year and 594 in grant year 2005-2006 through the UWUA/OSHA Disaster Response and Recovery training grant.
- Trained 283 workers in the 2006-2007 through the UWUAOSHA Disaster Response and Recovery training grant, no cost extension.
- Trained 487 workers and 1 manager in year 2006-2007 through the GCC OSHA Harwood Institutional Competency Building
- Trained 1108 workers and 109 supervisors in the 2007-08 grant year through the UWUA OSHA Trenching and Excavation Fatality and Injury Prevention training grant..
- Trained 74 additional workers in year 2007-2008 through the GCC OSHA Harwood Institutional Competency Building grant, no cost extension.
- Trained 71 workers in the first quarter of 2010-2011 through the GCC OSHA Harwood Materials Handling grant.

The development and popularization of worker trainers and the use of the Small Group Activity Method as well as the development of SOS-based H&S programs are significant contributions ISWE has made to health and safety education as well as the grantee communities they have been involved with over the years (including both OSHA and NIEHS). These methods form a cornerstone of training within these grantee communities. (See training plan section below for a description of the pedagogy).

#### **IV. Principal Program Staff**

## Principal Officer in Charge: Robert Lacey, GCC Secretary Treasurer

The principal officer in charge of the grant program will be GCC Secretary Treasurer Robert Lacey. Robert Lacey was elected vice president in 2004, and was named secretary-treasurer of the Graphic Communications Conference in October 2005. Secretary Treasurer Lacey has been principal officer in charge of GCC grants since 2006 overseeing six OSHA grants. A more complete bio is included in the Appendix.

Rob Theisen, GCC grant coordinator will assist Vice President Lacey to carry out this grant. He will work extensively with grant director, Paul Renner, on all aspects of this grant. Mr. Theisen will devote 13 percent of his time to this grant. Mr. Theisen has been intimately involved in the Union's OSHA grants since 1999 and has worked with the leadership team over this time. A more complete bio is included in the appendix.

#### Grant Director: Paul Renner

Paul Renner, Associate Director at ISWE, will serve as grant director and coordinate the train-the-trainer program. He will also coordinate the curriculum team, which will shape the curriculum and develop the Hazards of Amputation SOS H&S program and campaign. Mr. Renner, who worked 25 years as a chemical process operator at Merck Pharmaceutical Company, also served as the union's chief steward and health and safety committee member. Mr. Renner, now a labor lawyer, served a six-year apprenticeship on curriculum design at the Labor Institute, starting in 1993. He is responsible for heading a number of curricula teams that have produced hundreds of Labor Institute curricula. He has co-authored over 70 health and safety curricula.

## Associate Grant Director: Joseph Anderson

Joseph Anderson, Executive Director at ISWE will serve as the associate grant director. Mr. Anderson has extensive experience in both federal grant management and health and safety. He was the OCAW Health and Safety Director from 1989 to 1999. He has served as grant director for a number of federal grants, including six Susan Harwood grants. In addition, Mr. Anderson has extensive shop floor experience with health and safety issues, having served as president of the 1,000-member Merck Pharmaceutical local union from 1980 to 1985.

Mr. Anderson will also be in charge of the worker-trainer mentoring program, and he will take major responsibility for developing this grant program. He will coordinate all grant efforts on a day-to-day basis with Rob Theisen, as well as work on every program aspect of the grant. (See Appendix for list of projects administered)

#### Administrative Assistant, Curriculum and Production Coordinator Jean Urano

Jean Urano, project staff member, will coordinate general grant administrative activities with Joe Anderson, coordinate and desktop publish grant materials, as well as assist with developing curriculum, coordinating overall grant administrative issues, and training outreach with Joe Anderson and Rob Theisen. She has worked on staff at the Labor Institute and now ISWE since February 2006. Ms. Urano has worked on training grants with the OCAW, PACE, and the USW since 1988, performing administrative and bookkeeping functions. She was apprenticed as a curriculum writer under Paul Renner, co-authoring OSHA 10 and 30-hour curriculum and OSHA materials-handling training curriculum for the GCC.

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#### V. Workplan

#### A.1 Plan Overview

The GCC/ISWE plan is to build Centers of Competency within the GCC regions with known amputation problems. We will:

- 1. Design, conduct, analyze, and summarize a GCC H&S needs assessment.
- 2. Review the current list of worker trainers, replace non-active trainers, recruit replacement trainers, and train and support **20 GCC worker-trainers**.
- 3. Pilot test and review **all workbooks** that will be used to train GCC workers as trainers and obtain OSHA Technical Review approval, if changes are necessary.
- 4. Create and print an industry-specific **SOS Amputation Hazards Awareness workbook**, which reviews and emphasizes *Machinery and Machine Guarding*: 29 CFR Part 1910, Subpart O and *Control of Hazardous Energy (Lockout/Tagout)*:29 CFR 1910.147<sup>4</sup> <a href="http://www.osha.gov/Publications/osha3170.pdf">http://www.osha.gov/Publications/osha3170.pdf</a>).
- 5. **Train 705 workers, supervisors, and managers** during the first grant year (see chart C).
  - a. Train 20 GCC workers to be Small Group Activity Method trainers
  - b. **Mentor 20 part-time** GCC worker trainers.
  - c. **Train 250 workers, supervisors, and managers** at 10 off-worksite union-hall workshops or at on-site workshops in SOS Awareness trainings in 15 targeted trainings..

<sup>4</sup> http://www.osha.gov/Publications/osha3170.pdf

- d. **Train 125 workers, supervisors, and managers** on SOS Amputation Hazards Awareness training in a total 5 targeted trainings.
- e. Train 240 GCC rank and file leaders at four Regional GCC Conferences.
- f. Contact at least **50** persons for needs assessment survey
- 6. Provide for technical support for both Industrial Hygiene issues and SOS concept implementation and application.
- 7. Conduct evaluation:
  - During the workshops: We use workbook tear-out evaluation sheets so that participants can evaluate each training module.
  - After the workshops: We will record the impact of the training on H&S culture through follow-up interviews

Our training targets, where we will recruit the worker and manager trainees, will be:

- Workplaces where amputation hazards are present. (amputations are a major hazard in our industries.)
- The 8,100 **GCC** shop stewards who are in position to work with management to encourage on-site, on-the-clock training.

#### **Training**

# The workplan is built on the following four types of training:

- 1. **40 hours of train-the-trainer for 20 worker-trainers.** We will develop and maintain a team of 20 worker-trainers who train in pairs, using the non-lecture Small Group Activity Method (see below). The program will make a long-term investment to develop these trainers. During the grant period, the trainers will learn to conduct effective SOS and SOS Amputation Hazard H&S training aimed at producing positive change in the workplace, will provide feedback about the impact of the training, as well as contribute to strengthening the training curriculum. In addition, they will learn and be refreshed on training program content annually for each of the four years of the grant. The current and newly selected worker-trainers will attend our 40-hour train-the-trainer program. We will provide mentoring and support to each pair of trainers during their first workshop, as well as debriefing and mentoring by phone after subsequent training sessions. We will assess and recruit additional worker trainers annually as necessary. This training will include sections on OSHA worker rights and OSHA employers' responsibilities, with an emphasis on strategies for initiating OSHA site involvement.
- 2. **Ten, four- to eight-hour GCC/LI SOS Hazards workshops for 250 workers and managers.** The program will train 250 workers and managers for four to eight hours each year on how to apply OSHA's Hierarchy of Controls through the use of SOS to improve H&S in the workplace. Our goal is to help workers and managers integrate the content from the disparate H&S programs within a broader SOS approach, using the Hierarchy of Controls. To be selected for the worker-trainer program, each local union that sends a trainer must commit to organizing a workshop and recruiting 20-30 participants for each of these workshops to be held at local union halls, management facilities, or joint labormanagement training centers. This training will include sections on OSHA worker rights and OSHA employers' responsibilities, with an emphasis on strategies for initiating OSHA site involvement.
- 3. **Five, four- to eight-hour workshop on a SOS Approach to Amputation Hazards for 125 workers and management H&S personnel.** This program will conduct training for local union activists and managers at eight sites (average 25 participants at each training) that have experienced amputations or have hazards that might lead to such horrific incidents. This training will include sections on OSHA worker rights and OSHA employers' responsibilities, with an emphasis on strategies for initiating OSHA site involvement, when employers do not take the responsible steps for realistic and applicable amputation hazards elimination or strong meaningful abatement protections.

4. One- to two-hour H&S programs for 240 union delegates who will attend four regional union conferences per year. The union holds regional leadership conferences four times each year. Each conference attracts approximately 50 delegates. We will run Hazards of Amputation workshops and SOS Awareness programs at each of these four conferences. This also will serve as an outreach mechanism to generate additional training opportunities. This training will include sections on OSHA worker rights and OSHA employers' responsibilities, with an emphasis on strategies for initiating OSHA site involvement.

#### Targeted Recruitment

Industry statistics as well as OSHA's identification of the amputation risks within the industries we represent means that our workers face significant risks of amputations. As part of our needs assessment, we will identify workplaces at significant risk for amputations utilizing our network of worker-trainers and our training contacts developed through our past OSHA grants. In the first year, we will choose five sites for training and for the elimination of amputation hazards. We will prepare workers at these locations to campaign for elimination and control of these hazards, involving OSHA if an employer fails to take the proper corrective workplace action. We hope to convince the many employers who value our programs to conduct wall-to-wall GCC SOS Awareness training and workshops on the prevention of amputation hazards. In this way an entire facility will understand the SOS concepts and how to use them. Training an entire facility's workforce is an important safety strategy that can provide a valuable opportunity to engage both workers and managers in hazard identification and elimination.

# **Training Content**

**Train-the-trainer:** We will conduct a 40-hour train-the-trainer course for trainers to learn the Small Group Activity Method and the workbook materials. The trainers will practice using this pedagogy with their fellow trainers. This pedagogy puts the learner in the center of the workshop process. Participants are asked to work together to solve real-life problems, using their own skills and experiences as well as fact sheets provided in the workbooks. Participants are expected to learn by doing. The process is designed to build worker confidence, a key to adult learning. The workshops are broken into activities. Each activity, which usually runs from 30 minutes to one hour, has three common elements:

- 1. Small Group Tasks
- 2. Report Back
- 3. Summary

Adult Learning Exchanges: The procedure encourages three learning exchanges: worker-to-worker, worker-to-trainer and trainer-to-worker. The "worker-to-worker" learning exchange reproduces how workers most often learn on the job. The small group discussions provide time and space for this exchange. The "worker-to-trainer" exchange, which takes place during the report-back, allows the trainer to learn new information from the participants about course issues and their impact at work. The final, more traditional learning exchange is from trainer to worker.

## **Training Workbooks**

We will review our OSHA-approved train-the-trainer workbook, adding activities on Worker Rights and Employers Responsibilities under OSHA. This workbook, which we have used previously provides instruction and refresher training to GCC worker-trainer's in the skills required to deliver training the materials in the Small Group Activity Method (SGAM, see description above). Below is the table of contents for this workbook:

Activity 1: Introduction to the Small Group Activity Method .of Training (4 Tasks)

Activity 2: Making Health and Safety History (1 Task)

Activity 3: Systems of Safety (Exxon Valdez) (2 Tasks)

Activity 4: Systems of Safety (Space Shuttle) (1 task)

Activity 5: Systems of Safety (Titanic) (2 tasks)

Activity 6: Systems of Safety (BP) (2 Tasks)

Activity 7: Systems of Safety (Bhopal) (2 Tasks)

Activity 8: Fixing the Exxon Valdez (2 Tasks)

Activity 9: An Introduction to Logic Tree Diagramming

Activity 10: Training Tips and Techniques (1 Task)

Activity 11: Preparation for Training (2 Tasks)

Activity 12: Warning! Systems Thinkers at Work (4 Tasks)

Activity 13: Systems of Safety: Personal Experiences (2 Tasks)

Activity 14: Using Systems of Safety to Eliminate Hazards (3 Tasks)

Activity 15: Charting Your Large Group Plan (5 Tasks)

Appendix A: Supplemental Information for Training the Trainers

Sample TTT Agenda: Preparation Time for Lead Trainers

Cautions!

How to Get 'Em Into the Classroom

Appendix B:

Appendix C: Attendance Form and Sign-in Sheet

We will submit this workbook for Technical Review if substantial changes to its contents are made...

## **SOS Awareness Training**

Building our organizational capacity will allow the GCC to assist our local unions, to provide our members and employers with high quality SOS-based H&S training, build Centers for Competency, and provide much needed technical support. We will use these next four years to provide training and support that will help GCC-represented facilities build a H&S culture based on the SOS approach. Through practical example, a foundation will be created for strong partnerships by showing these employers the positive benefits of adopting an SOS approach. We will document the impact of our program, and use these results to help leverage employers' investment in ongoing H&S training beyond the four-year period of this OSHA Capacity Building Developmental grant.

SOS Awareness training is central to this goal. We believe that prevention is best achieved if workers and managers understand how to apply OSHA's Hierarchy of Controls through the use of SOS as well as how these concepts provide the most effective, economical approach to find the root causes of workplace hazards.

Below is the proposed table of contents for this workbook:

Activity 1: Understanding Systems of Safety (2 Tasks)

Activity 2: Using Systems of Safety to Identify Hazards (2 Task)

Activity 3: Using Systems of Safety to Eliminate Hazards (1 Task)

Activity 4: Understanding OSHA's Hierarchy of Controls and Systems of Safety (2 Tasks)

Activity 5: Introduction to Personal Protective Factors (2 Tasks)

Activity 6: Lockout/Tagout (3 Tasks)

Activity 7: Worker Rights and Employers Responsibilities under OSHA (1 Task)

#### **Amputation Hazards Awareness Training**

We will develop a workbook that will feature how to use the SOS approach to identify, eliminate, or strongly remediate amputation hazards. It will include worker rights and employer responsibilities under OSHA. The workbook will review the OSHA standards applicable to amputation control in GCC-represented industries

## such as Machinery and Machine Guarding: 29 CFR Part 1910, Subpart O and Control of Hazardous

# Energy (Lockout/Tagout):29 CFR 1910.147<sup>5</sup> (http://www.osha.gov/Publications/osha3170.pdf)

Below is our proposed table of contents for the Amputation workbook:

Introduction

Activity 1: Hazards of Amputations in our (2 tasks)

Activity 2: Amputation Hazard Identification (2 tasks)

Activity 3: OSHA Hierarchy of Controls through Systems of Safety (3 tasks)

Activity 4: Systems of Safety Strategies for Recommending Elimination and Remediation of Amputation Hazards (3 tasks)

Activity 5: Incident Investigation using the Root Cause Analysis (2 tasks)

Activity 6: Worker Rights and Employers Responsibilities under OSHA (1 task)

Activity 7: How to Work with OSHA to Assure that Recommendations for the Elimination or

Control of Amputation Hazards are Applied to Your Workplace (3 tasks)

Activity 8: The Applying the OSHA Standards for Prevention (1 task)

Activity 9: The Application of Mitigation Controls through Machine Guarding

Activity 10: The Role of Lockout Tagout in avoiding Amputations

Appendix:

We will work closely with Region III OSHA program office to satisfactorily complete this workbook. This workbook will then be submitted to OSHA for technical review and approval prior to being used. These modules, which are likely to be substantially redeveloped after pilot testing, will be submitted for re-approval by OSHA before they are used in worksite training.

#### Anticipated benefits to the workers receiving the training:

We anticipate that our training will help decrease amputation incidents by facilitating the identification, elimination and remediation of worksite hazards.

- 1. We will provide high quality amputation hazard awareness and prevention training to our members; our observations suggest that many have never received such training.
- 2. We will establish a GCC industry-wide, replicable SOS H&S awareness program as well as Centers of Competency in regions most susceptible to amputations, offering a level of H&S training and technical support to GCC members that has never before been available.
- 3. Based on our experience training worker trainers, we have observed that they experience a dramatic increase in their ability to improve H&S at the workplace. Interviews with worker-trainers have documented a dramatic (and justified) sense of pride and empowerment.

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<sup>&</sup>lt;sup>5</sup> http://www.osha.gov/Publications/osha3170.pdf

4. Workers who participate in workshops using the Small Group Activity Method tend to gain a new appreciation for the potential of H&S training. Most workers are familiar with training that tells them what to do and not to do, often in the form of a video. As one GCC local representative put it, "I never saw a video I could ask a question to." The training will give workers greater access to information, including each other's accumulated knowledge about how to prevent incidents and exposures.

Our proposed SOS awareness and SOS amputation hazards awareness training programs emphasizes the **union's commitment to a national worker-centered program.** This OSHA Capacity Building Developmental grant will illustrate the GCC's commitment not only to our members, but equally important, it will demonstrate this to employers. This offers us both the visibility and leverage to apply constructive pressure to prevent workplace injury and illness, with a focus on eliminating and controlling amputation safety problems.

We have observed that union-led programs, supported by management, increase and improve communication between workers and managers. They also help to generate collaborative and innovative solutions to H&S issues. The improved communication as well as the active participation of workers is essential to creating a workplace culture that supports preventive health and safety during and beyond the grant period.

#### **B.** Activities

Curriculum Team: ISWE will be responsible for developing and pilot testing all project curricula. This

Curriculum Team will include Paul Renner, Joe Anderson, and Jean Urano.

- 1. Continue to develop and write Systems of Safety Awareness Training workbook and the Amputation Hazard Awareness Training workbook, and work closely with OSHA Region III to accomplish these goals. These workbooks will be submitted to OSHA for technical review and approval before being used in the field. Our Training-the-Trainer workbook will also be reviewed. If any substantial content changes are to be made, we will submit the revised workbook for Technical Review.
- 2. Recruit 20 worker-trainers. Over the past ten years we have recruited and trained worker-trainers each year. We will draw from this pool of experienced part-time worker-trainers for this grant. Robert Lacey, the GCC national officer in charge of health and safety, will recruit the 20 prospective worker-trainers. One essential criterion for selecting new trainers is that they must be able to be released from their jobs to participate in our one-week train-the-trainer program scheduled for the first or second quarter. (See Section C: Quarterly Training Projections) Additionally,, the local unions sending trainers must commit to recruiting a minimum of 20 to 30 workers and managers for each workshop. In some cases, the union may be able to convince the company to host the workshops on company time and at company facilities. However, in most cases we expect courses will be held at local union halls.
- 3. Develop the final editions of a GCC printing industry-specific workbook for the train-the-trainer course. Our train-the-trainer program works best when the new trainers can work from materials similar to those they will use in the field. We will draft an industry-specific workbook as discussed above before the train-the-trainer program scheduled for the end of the first quarter or the beginning of the second quarter. Work on these workbooks in concert with OSHA Region III will begin immediately so that the workbooks are available for our technical training session. Jean Urano will desktop-publish and illustrate the workbooks so that they will be ready for review by OSHA as soon as possible. Paul Renner will be in charge of the curriculum development team. This edition will be piloted during the train-the-trainer session, and if necessary, appropriate changes will be made as necessary, and submitted to OSHA for Technical

Review for their use (Systems of Safety Awareness Training and Amputation Awareness Training) in the field.

- 4. Conduct the train-the-trainer program. Anderson and Renner will take responsibility for conducting a 40-hour train-the-trainer program. The program will take place at the end of the second quarter or the beginning of the third quarter, at a location that has yet to be determined. This training, which has been used to develop more than 500 worker-trainers in OCAW, PACE, USW, GCC/IBT, UWUA, the UAW, CWA and SEIU, allows the new worker-trainers to learn and practice using the Small Group Activity Method in a supportive setting. By the end of the week, the trainers will be ready to conduct workshops in the field with mentoring by the grant staff.
- 5. Revise the workbooks. The train-the-trainer program serves as a venue to pilot our workbooks. Inevitably, we will want to make changes based on how the curriculum worked during that week. We expect to make those revisions in close cooperation with OSHA Region III shortly after the train-the-trainer session and submit copy for OSHA review.
- 6. Worker-trainers conduct trainings. By the end of the third quarter, the 20 worker-trainers, training in pairs, will begin to conduct workshops for 705 GCC members and managers (train and mentor 20 worker trainers) 250 SOS Awareness trainees; 125 Amputation Awareness trainees; and 240 delegates at four conferences, contact 50 participants for needs assessment survey: [See C Training Projections]). By the end of the grant year, our goal is for each of the ten worker trainer pairs to conduct two workshops, reaching an average of 20 to 30 workers per workshop, totaling 705 trainees. The worker-trainers will be responsible for collecting the sign-in list of names, activities covered, as well as training evaluations from each participant. This information will be sent to the GCC. The evaluations will be forwarded to Urano for review and tabulation. This system has worked well for our previous OSHA Susan Harwood grants.
- 7. Mentoring the worker-trainers. ISWE staff will implement the mentoring program, which we have used over the past 15 years. When new trainers conduct their first workshops, they will be mentored by one of our experienced, certified trainer. ISWE staff will provide ongoing mentoring and support as the new trainers conduct additional workshops
- 8. Evaluate our training program impact. In the fourth quarter, we will interview worker trainers, as well as worker and manager trainees to discover what workplace changes have resulted from our training. We will focus on changes that indicate changes in H&S culture. ISWE Staff will compile the final report.

#### C. Quarterly Training Projections Year One

			1st Q				2nd Q				3rd C	1			4th Q		Year Total	Hrs	Total
Activities		#	Par t	Qtr Tot		#	Par t	Qtr Tot		#	Par	Qtr Tot		#	Part	Qtr Tot			
Conceive, Conduct Analyze needs assessment	x				x			20				20				10	50	4	
Recruit Trainers	X	F		0				0				0				0	0		
Develop Training Opportunities	X	Ħ		0	x			0	x			0	X			0	0		
Develop/Produce Curriculum	X	P,		0	X			0	X			0	X			0	0		
Train Trainer Workshop -20 trainers				0	х-	1	20	20				0				0	20	40	
Trainer Mentoring		П		0	Х	4	1	4	x	6	1	6	X	10	1	10	20	2	

10 4- 8-hr SOS Awareness Workshops in Field		0	х	2	25	50	х	4	25	100	х	4	25	100	250	8	20
5 Targeted 4-8 Amputation Hazards Awareness Trainings		0				0	x	4	25	50	х	3	25	75	125	8	1(
2-4 hr Trainings at 4 Conferences		0				0	х	2	60	120	х	2	60	120	240	4	Q
Modify, Conduct, Evaluate Model H&S Programs		0				0	x			0	х			0	0		
Training Totals		0				94				276				315	705		50

#### D. Materials

We will review our OSHA-approved Training for Trainers workbook to make sure it is suitable for training new trainers in this program. We will then make necessary adjustments working closely with OSHA Region III. If changes are made, this workbook will be desktop published, sent to OSHA for technical review, piloted in the field, and edited based on the pilot testing. The final OSHA-approved versions will be desktop published and printed for training in the field. The timetable for production, pilot field testing and final printing are listed in the table above. We will review our Training-the-Trainer workbook used at the Technical Training meetings, and only submit it to OSHA for technical review if substantial content changes are made.

#### E. Evaluation

#### **Training Evaluation**

We have developed a training evaluation system for use with worker-trainers. It has three parts:

- Participant Evaluations: The workbook curriculum is broken into a series of small group problem-solving activities that require the participants to work together in small groups to tackle problems similar to those they experience at work. The participants use their knowledge and factsheets provided for each activity. At the end of the activity each participant fills out an evaluation sheet that is torn out of the workbook. The participant rates the activity on a scale of one to five, with five being the highest, and checks which factsheets he or she believes would be most useful to distribute to the rank and file. The participant can also write what he or she would want to see done to improve that activity. We tabulate and review the evaluations. Activities with ratings above 4.0 generally mean that the activity went well. Lower average ratings mean either that the trainers had difficulty with the training, or that the curriculum is problematic and should be changed.
- *Trainer Evaluations*: Each training pair is asked to fill out a trainer evaluation form to evaluate the training and the training curriculum. Joe Anderson, the associate grant director, will review these forms.
- *Mentor Evaluations:* The first time trainers train in the field they are mentored by experienced trainers who provide guidance and support. They will also receive mentoring provided by phone during subsequent trainings. This ongoing contact will ensure that both consistency and integrity of program implementation, as well as allow us to identify and resolve any issues with training implementation and worker trainer retention.

## 1. Comparing planned and actual accomplishments

Paul Renner will be responsible for producing a quarterly written reports that compare the planned activity with actual accomplishments.

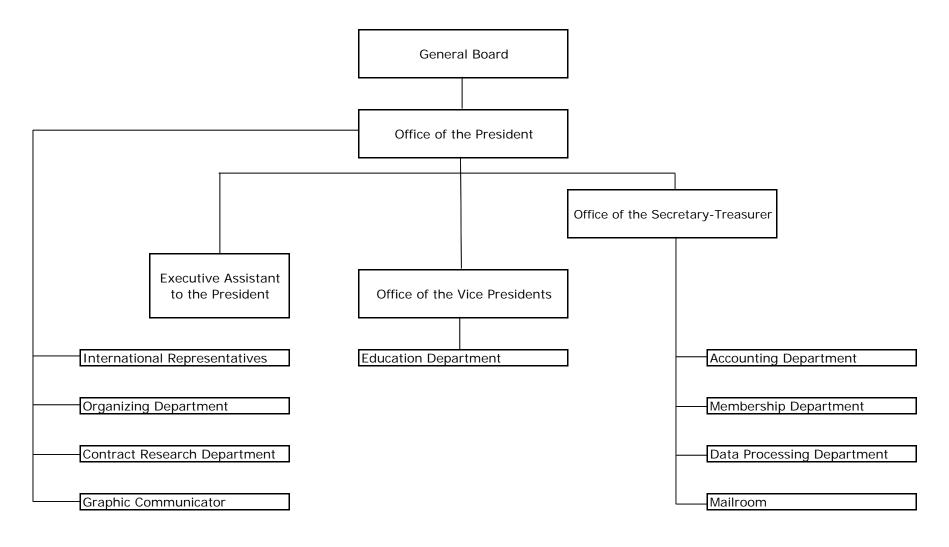
- 2. Assessing the workplace impact of the training. The grant period will allow a unique opportunity to assess how the health and safety workplace culture shifts over time with repeated training opportunities. We will interview worker trainers, as well as worker and manager trainees to assess how the following indicators of health and safety culture change as a result of the program during the grant period: quality of communication between workers and managers, types of corrections, the level of SOS in which the changes were made, and perceptions about workplace safety. During the year, we will collect the following information:
  - We will conduct a telephone interview with worker trainers and a sample of workers and managers who attended the offered trainings.
  - We will include a tool in the train-the-trainer workbook asking worker trainings to document and report their observations as to how the indicators change as a result of the training.
  - We will gather and assess workplace changes that resulted from our training.

This information will be summarized in a year-end evaluation report. These assessments will take place in the final quarter of the grant year.

We believe that the application OSHA's Hierarchy of Controls through SOS is the key to building a positive safety culture and to preventing serious incidents at the workplace, especially those that might lead to amputations.

Thank you for your consideration.

# **Graphic Communications Conference of the International Brotherhood of Teamsters**



Category	 Fed	eral			
	Admin.		Program		Total
6.a. Personnel					
Rob Thiesen, GCC Grant Coordinator salary \$80000 (13%)	\$ 5,200	\$	5,200	\$	10,400
Ayesha Wright, GCC Accountant salary \$80000 (5%)	\$ 4,000	\$	-	\$	4,000
6.b. Fringe Benefits					
Rob Theisen, GCC Grant Coordinator (60%)	\$ 3,120	\$	3,120	\$	6,240
Ayesha Wright, GCC Accountant salary \$80000 (60%)	\$ 2,400	\$	-	\$	2,400
<b>Travel</b> Grantee Orientatioin Meeting in Chicago 1 Program, 1 Financial 2 Grant Staff x \$550 air/ground lodging, 1 night @ \$100/night x 2 Grant Staff		\$ \$	1,100 200	\$ \$	1,100 200
6.f. Contractual - GCC Worker-trainer per diem  Part-Time Employee Trainers  Train-the-Trainers					
\$225/day x 20 trainers x 5 days		\$	22,500	\$	22,500
Training at Union Halls/Company Training Centers 15 workshops x 2 trainers x 1 day		\$	6,750	\$	6,750
Training at 4 Conferences 4 Conferences x \$225/day x 2 trainers x 2 days		\$	3,600	\$	3,600

#### 6.f. Contractual - GCC Worker-trainer Travel

Personnel:						
6.f. Contractual ISWE Detailed Budget:						
Cost Per Trainee	\$	284				
Total Administration Percent Administration	\$	40,134 20.1%			\$	66,233
Total Budget	\$	40,134	\$	159,866	\$	200,000
Supplies			\$	1,212	\$	1,212
<b>6.h.other</b> Hall rental @\$100 x 15 workshops			\$	1,500	\$	1,500
ISWE Contract (Detailed Budget follows)	\$	25,414	\$	77,734	\$	103,148
Training at 4 Conference 2 trainers x 4 workshops x \$550 air/ground lodging, 2 nights @\$100/night x 4 conferences			\$ \$	4,400 800	\$ \$	4,400 800
Training at area union halls/training centers 20 trainers x \$50 ground trans			\$	1,000	\$	1,000
Field-training Release time (\$225/day) for 2 Trainers for each of 15 field wo Lodging, 30 trainers x I night each@\$100/night	orkshops		\$ \$	6,750 3,000	\$ \$	6,750 3,000
Train-the-Trainers 20 trainers x \$550 air/ground lodging, 5 nights @ \$100/night x 20 trainers			\$ \$	11,000 10,000	\$	10,000

### (Day rates include fringe benefits)

Paul Renner, Grant Director 20 days @ \$799 per day	\$	4,796	\$	11,190	\$	15,986
Joe Anderson, Assoc Grant Director 20 days @ \$771 per day	\$	4,629	\$	10,801	\$	15,429
Jean Urano, Prod, Admin, Curric Devel, Training Outreach 20 days @ \$664 per day	\$	6,644	\$	6,644	\$	13,287
Contract Illustrator/Translator 2.5 days @500 per day	\$	-	\$	1,250	\$	1,250
Contract Industrial Hygenist 16 hours @ \$115 per hour	\$	-	\$	-	\$	-
Total Days Total Personnel Costs		22 \$16,068		41 \$29,884		62.5 \$45,952
Travel: Travel for Train the Trainers (Anderson/Renner) 2 trips x 2 staff @ \$550 air/ground lodging: 5 nights @ \$100/night x 2 staff perdiem:2 staff x 6 days x \$48			\$ \$ \$	3,300 1,000 864	\$ \$ \$	3,300 1,000 864
Travel for Mentoring, (Renner/Anderson) and 2 trips for coordination with Headquarters and OSHA mee 4 trips @\$550	ting @\$55	0	\$	2,200	\$	2,200
0 trips @\$330 0 trips for coordination with DC Office @\$550 lodging: 10 nights @ \$100/night perdiem: 20 days @ \$48	\$ \$ \$	- 200 192	\$ \$	800 768	\$ \$ \$	1,000 960

<ul><li>6.h. Other:</li><li>Production/Printing of Workbooks/Materials</li><li>Workbooks:</li></ul>			
Training for Trainers: 50 copies @ \$50		\$ 2,500	\$ 2,500
Training Workbooks/handouts: 850 participants @ \$40		\$ 34,000	\$ 34,000
ISWE Office Direct Costs*			
rent and utilities	880	1,620	\$ 2,500
telephone	196	360	\$ 556
postage	29	54	\$ 83
office supplies	33	60	\$ 93
books and subscriptions	16	30	\$ 46
computer and supplies	65	120	\$ 185
photocopying	49	90	\$ 139
equipment	46	84	\$ 130
ISWE Direct			
ISWE Indirect (8% NIEHS Rate)	\$ 17,773	\$ 77,734	\$ 95,507
ISWE Total	\$ 7,641		\$ 7,641
	\$ 25,414	\$ 77,734	\$ 103,148

<sup>\*</sup>These direct office cost categories are prorated based of the number of days worked on the OSHA grant

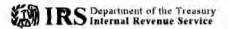
admin.days = 22

divided by the total number of FTE days at the ISWE Project= 675.00

For this grant prorated direct costs for "administration" = 3.259%

program days = 41

and prorated direct costs for 'program" = 6.00%



OGDEN UT 84201-0046

In reply refer to: 0424156105 Mar. 30, 2006 LTR 252C E0 62-0247360 000000 00 000

03152 BODC: TE

GRAPHIC COMMUNICATIONS CONFERENCE
OF THE INTL BROTHERHOOD OF TMSTRS
1900 L ST NW 8TH FLR
WASHINGTON DC 20036-5022082



010951

Taxpayer Identification Number: (6)(6)

Dear Taxpayer:

Thank you for the inquiry dated Feb. 23, 2006.

We have changed the name on your account as requested. The number shown above is valid for use on all tax documents.

If you have any questions, please call us toll free at 1-877-829-5500 between the hours of 8:30 a.m. and 5:30 p.m., Eastern Time.

If you prefer, you may write to us at the address shown at the top of the first page of this letter.

Whenever you write, please include this letter and, in the spaces below, give us your telephone number with the hours we can reach you. Also, you may want to keep a copy of this letter for your records.

Telephone Number	(		Hours
------------------	---	--	-------

Sincerely yours,

Marilyn Jordan

Marilyn Jordan
Dept. Manager, Code & Edit/Entity 3

Enclosure(s): Copy of this letter

10 to

APR 0 3 2006

ASCOURAGE A

# Internal Revenue Service District Director

nal Revenue Service Department of the Treasury

31 Hopkins Plaza, Baltimore, MD 21201

Graphic Community
Union
1900 L St., N.W.
Washington, D.C. 20036 Graphic Communications International

Person to Contact: Mrs.Zalesch Telephone Number: (301) 962-3280 Refer Reply to: ... Correspondence Date: August 29,1983

	The following information regarding tax exempt status
is f	urnished in response to your letter datedJuly 22,1983
	We have searched our files and can find no record that the organization is exempt from Federal Income Tax. In the event the organization wishes to apply for tax-exempt status, the appropriate forms and information are attached.
Ø	A search of our files indicates that the organization is exempt from Federal Income Tax under Section 501(c)(5)of the Internal Revenue Code
	effective October 1961.
	A fact sheet containing basic information about the organization's tax-exempt status is enclosed.
	A copy of our letter certifying the status of the organization is enclosed.
	A copy of our letter certifying the status of the organization is not available, however, this letter may be used to verify your tax-exempt status.
	Your change of address has been noted in our files. Our records now indicate your address as:

Sincerely yours, Teddy R. Kern. District Director

#### Internal Revenue Service District Director

Department of the Treasury

31 HOPKINS PLAZA A BALTIMORE, MD 21201

Date: APR 2 6 1990

GRAPHIC COMMUNICATIONS
INTERNATIONAL UNION
1900 L STREET NW
WASHINGTON, DC 20036

Employer Identification Number:

MRS. S. PRATT
Contact Telephone Number:
(301) 962-4779

Date of Exemption: 1941 Internal Revenue Code Section 501(c)(5)

Group Exempt Number (b) (6

Dear Applicant:

Thank you for submitting the information shown on the enclosure. We have made it a part of your file.

The changes indicated do not adversely affect your exempt status and the exemption letter issued to you continues in effect.

Please let us know about any future change in the character, purpose, method of operation, name or address of your organization. This is a requirement for retaining your exempt status.

Thank you for your cooperation.

Sincerely yours,

District Director

APR 0 1990

THE OFFICE OF
THE SECRETARY TREASURER

#### GRAPHIC COMMUNICATIONS

Item Changed

From

Τo

Merger of the Graphic Arts International Union and International Printing and Graphics Communications Union

Name changed to Graphic Communications International Union



#### GRAPHIC COMMUNICATIONS CONFERENCE INTERNATIONAL BROTHERHOOD OF TEAMSTERS 1900 L STREET, NW, SUITE 800, WASHINGTON, DC 20036-5080

202/462-1400 Fax: 202/721-0600

June 29, 2011

#### To Whom It May Concern:

We certify that we have a functioning accounting system that can meet the following criteria:

- 1. Accurate, current and complete disclosure of the financial results of each federally sponsored project.
- 2. Records that identify adequately the source and application of funds for federally sponsored activities.
- 3. Effective control over and accountability for all funds, property and other assets.
- 4. Comparison of outlays with budget amounts.
- 5. Written procedures to minimize the time elapsing between the transfer of funds.
- 6. Written procedures for determining the reasonableness, allocability and allowability of costs.
- 7. Accounting records, including costs accounting records, that are supported by source documentation.

Sincerely,

Llerge Tedeschi
George Tedeschi

President

Robert Lacey

Secretary Treasurer

GT/RL/aw





#### Biography

was named Acting Secretary-Treasurer of the GCC/IBT in October 2005. The delegates to the GCC's 2006 Convention subsequently confirmed his title and position to be that of Secretary-Treasurer/Vice-President of the Conference.

Brother original 2004 election was as an International officer to the position of Vice-President of the Graphic Communications International Union. On January 1, 2005 the GCIU merged into the International Brotherhood of Teamsters and became the Graphic Communications Conference of the IBT (GCC/IBT).

A graduate of Vincennes University with a degree in graphic arts, Mr. was elected President of Evansville Local 571-M in 1985 and served in that post until his 2004 election as a GCIU Vice President. He also served as Financial Secretary-Treasurer of Local 571-M from 1983 to 1985.

As a local officer in Evansville, Mr. (b) (6) also served as President of the Evansville Allied Printing Trades Council, Secretary-Treasurer of the Evansville Labor Temple, Recording Secretary of the Central Labor Council of Southwestern Indiana, and Vice-President of the Labor Day Association, as well as serving on boards or advisory committees for the United Way of Southwestern Indiana, Wellborn HMO, and the Indiana Vocational Technical College.

Mr. (b) (6) has previously served as Secretary-Treasurer of the Midwestern States Conference, trustee on the GCIU Supplemental Retirement and Disability Fund (SRDF) and trustee on the Graphic Communications National Health and Welfare fund, where he chaired the Appeals Committee and served on the Executive Committee.

In addition to his current duties as Secretary-Treasurer/Vice-President of the GCC/IBT, Mr.

(b) (6) serves as a Trustee and member of the Executive Committee of the Supplemental Retirement and Disability Fund, as the Secretary-Treasurer of the International Allied Printing Trades Association, Secretary to the Officers/Representatives/Organizers (ORO) Pension Fund, Secretary to the National Health and Welfare Fund and Secretary to the Benevolent Trust Fund (BTF), as well as overseeing the GCC Education, Safety and Health, and Contracts and Research departments.

Brother (b) (6) many accomplishments include:

- Certified AFL-CIO Union Counselor
- United Way Volunteer of the Year Labor (1992)

# Rob (b) (6) Bio

Robert (b) (6) has been a member of GCIU Local 14-M since 1997 and has worked in multiple capacities for the Union since 1989. Rob holds a Bachelor's Degree in Education and has a background in engineering and computer technology. Rob is currently the Director of Education and Technology for the Andrew J. Gress Graphic Arts Institute a non-profit technical training facility serving the printing industry in the tri-state area. For the past five years Rob has been developing course content and curriculum for the Philadelphia Community College and Monmouth County Vocational School and actively serves on Advisory Boards for both entities. Rob also acts as the GCIU Local 14-M Apprenticeship Program Coordinator and Technology Advisor and provides instruction and technical assistance to the Philadelphia School District Printing Arts programs. Currently Rob is an advisor to the Manufacturing Skill Standards Council and the Graphic Communications International Union's Education Coordinator. He also acts as a Graphic Communications International Union Health and Safety Mentor, Leadership Trainer and Curriculum Development Team member. Most recently he has undertaken the responsibility of developing and delivering a comprehensive distance education program for the members of the Graphic Communications Conference.

# Joseph (b) (6) Executive Director, ISWE

#### **Professional Experience**

1970 - 1990	Carpenter, Merck & Co. Inc.
1988 – 1989	Director of Labor, Part-time, New Jersey Industrial Union Council/Work Environmental Council. Organizing for the New Jersey Right to Act Coalition. Agitating for passage of Right to Act Legislation in the state (Hazard Elimination Through
	Local participation, HELP)
3/90 – 9/90	<b>Director of Labor</b> , full-time, Work Environment Council. Organizing for Right to Act Coalition and agitating for passage of HELP bill.
11/90 - 9/91	Evaluation Specialist and Promotion Coordinator, OCAW NIEHS Hazardous Waste Training Grant.
9/91 - 10/94	Grant Administrator, OCAW NIEHS Hazardous Waste Training Grant
10/94 - 8/96	Acting Director, OCAW Health and Safety Department and principal investigator on NIEHS HWWTP
8/96 - 7/99	Director, OCAW Health and Safety Department and Grant Projects (NIEHS HWWTP, Med Surv, and OSHA)
7/99 – present	PHI Consultant, Labor Institute, New York
2000-2004	Project Director, Utilities Workers Union of America, OSHA Susan Harwood Training Program.
2000-2008	Project Director, Graphic Communications International Union, OSHA Susan Harwood Training Program.
2010-	Project Director, UWUA NIEHS Training Grant

#### Relevant Work/Professional Experience

Local Union Shop Steward 1974-76; Local Union Health and Safety Committee Chair 1975-78; Local Union Recording Secretary 1976-80; Local Union President 1980-85; OCAW District 8 Council Executive Board Member 1981-85 and 1988-90; New Jersey IUC Vice President 1984-90; New Jersey Right to Act Coalition Labor Organizer 1988-90; and New Jersey State Training and Employment Commission.

As local union president, directed plant wide NIOSH onsite asbestos and liver survey.

He has been the Project Director for the OSHA Susan Harwood Training Program of the UWUA and GCIU beginning in 2000.

#### **Labor and Professional Organizations**

APHA member

New Jersey Industrial Council, AFL-CIO

Local 2-149 member, Paper, Allied-Industrial, Chemical and Energy Workers (PACE)

#### **Publications**

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  L. Cook, M. Gill, G. Morris, P. Renner, R. Westmoreland, PACE/Labor Institute, Training the Trainers, NY: Labor Institute, 2003.
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- J. (6) (6) L. Cook, M. Gill, M. Kaufman, T. McQuiston, G. Morris, P. Renner, D. Stephens, B. Williams, R. Westmoreland, PACE/Labor Institute Introduction to the PACE Systems of Safety Initiative, Edition 2.0, NY: The Labor Institute 2004.
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- J. (b) (6) K. Burris, L. Cook, T. McQuiston, G. Morris, H. Potter, P. Renner, D. Stephens and R. Westmoreland, *Basic Health and Safety for Devastated Communities*, NY, The Labor Institute, 2006.
- J. (5) (6) K. Burris, P. Renner, and R. Westmoreland, *PreStartup Safety Review Training, Hurricane Edition, Drafts 1-2.2*, NY, The Labor Institute, 2006.
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- J. (b) (6) K. Burris, J. Urano and P. Renner, GCC/IBT/Labor Institute Systems of Safety Materials Handling, Hazardous Materials, Cranes and Slings Awareness Training, NY, The Labor Institute, 2008.
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- J. (6) K. Burris, and P. Renner, UWUA/Detroit Edison/The Labor Institute Hazard Awareness through Systems of Safety Program, NY, The Labor Institute, 2009.
- J. (b) (6) K. Burris, and P. Renner, UWUA/So. California Edison/The Labor Institute Systems of Safety Hazard Mapping Project, NY, The Labor Institute, 2010.

# (b) (6) (b) (6) Associate Director, ISWE

Middlesex College, Edison, New Jersey	AA	1989	Liberal Arts	
Kean College, Union, New Jersey	BA	1991	Political Science	
Rutgers Law School, Newark, New Jersey	JD	1995	Labor Law	

#### **Professional Experience**

Chemical Operator class D through AA and Laboratory Animal Technician, Merck & Company
Merck Fire Department, Search and Rescue team and Merck Hazmat Response team
Vice President, New Jersey Industrial Union Council
Associate Curriculum and Training Director, Labor Institute
Associate/of Counsel, David Tykulsker & Associates
Of Counsel, David Tykulsker & Associates
Co-PI, UWUA NIEHS Training Grant

#### **Relevant Work Experience**

1976 – 1993	Shop Steward, Committeeperson-Steward, Committeeperson, Unit Chairperson, Chief Steward, and Executive Board, OCAW Local 8-575
1981 - 1984	Vice President, OCAW Drug & Cosmetic Council
1991 - 1993	Merck Research & Development Health & Safety Committee
2003-Present	Recording Secretary, PACE Local 1-149

#### Professional Certifications/Memberships

1979	Graduate of Rutgers Labor Leadership Academy
1987	American Association For Laboratory Animal Science certification, Laboratory Animal Technician
1996	Admitted to New Jersey Bar American Bar Association
1997	Certified to practice, Federal District Court, 3 <sup>rd</sup> Circuit
1998	Certified to practice, Appellate Division, 3rd Circuit

#### Awards

1991	Summa Cum Laude, Kean College
1989	Summa Cum Laude, Middlesex College

#### **Publications**

- S. Cable, B. Davis, G. Erwin, B. Hoyle, P. (b) (6) Eric Scherzer, Process Safety Training, Drafts 7 & 8, NY: Apex Press, 1995, 1996.
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- S. Cable, B. Davis, G. Erwin, B. Hoyle, P. (6) (6) OCAW/Labor Institute Incident Investigation Training for Huntsman Corp., Draft 1, NY: Labor Institute, 1996.
- S. Cable, B. Davis, G. Erwin, B. Hoyle, P. OCAW/Labor Institute Incident Investigation, Draft 1, NY: Labor Institute, 1996.
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- S. Cable, B. Davis, G. Erwin, B. Hoyle, P. OCAW/Labor Institute Incident Investigation Training, Champion International Corporation, Local 425 UPIU, Draft 1, NY: Labor Institute, 1997.
- S. Cable, B. Davis, G. Erwin, B. Hoyle, P. O (6) OCAW/Labor Institute Incident Investigation Training, District Council, Draft 1, NY: Labor Institute, 1997.
- S. Cable, B. Davis, G. Erwin, B. Hoyle, P. OCAW/Labor Institute Incident Investigation Training, NY: Labor Institute, 1997.
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- S. Cable, B. Davis, G. Erwin, M. Griffon, B. Hoyle, P. (6) R. Westmoreland, OCAW/Labor Institute Triangle of Prevention (TOP) Training, (DOE and EPA drafts), NY: Labor Institute, 1997.
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- S. Cable, B. Davis, G. Erwin, M. Griffon, B. Hoyle, P. (b) (6) OCAW/Labor Institute Annual Refresher Training for Hazardous Waste Operations, Drafts 4, 4.1, NY: Labor Institute, 1997.
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- J. Bravo, S. Cable, G. Erwin, Amy Goldsmith, P. Tau Lee, L. Leopold, P. (b) (6) Jenice View, Just Transition Movement for Jobs and the Environment, Vol. 2, Drafts 1 and 2, NY: Public Health Institute, 1998.
- S. Cable, G. Erwin, M. Gill, T. Mix, P. (6) (6) R. Westmoreland, OCAW/Labor Institute Incident Investigation Training, Draft 4, NY: Labor Institute, 1998.
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- S. Cable, G. Erwin, M. Gill, M. Griffon, T. Mix, P. (b) (6) R. Westmoreland, OCAW TOP Training Program; DOE Facility at Idaho FA.ls, NY: Labor Institute, 1998.
- S. Cable, G. Erwin, M. Gill, T. Mix, P. (b) (c) R. Westmoreland, OCAW/Labor Institute TOP Training, Sun Co. Edition, Draft 2, NY: Labor Institute, 1998.
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- S. Cable, G. Erwin, M. Gill, T. Mix, P. J. Ramirez, R. Westmoreland, PACE/Labor Institute Hazardous Materials Workbook, Draft 8.1, NY: Apex Press, 1999.
- S. Cable, G. Erwin, M. Gill, M. Griffon, T. Mix, P. (5) (6) R. Westmoreland, PACE/Labor Institute Worker Health Protection Program, Draft 2, NY: Labor Institute, 1999.
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#### (b) (6)

Administrative Asst/Curriculum Production Coordinator

Aims Community College AAS 1985 Information technology Metropolitan State College, Denver, CO BS 1996 Accounting

#### Worker Experience:

1986-1999 Secretarial, OCAW, worked 1.5 years in the secretarial pool; 1.5 years for Membership Services, Special Projects and Health and Safety. Administrative Assistant for Health and Safety Department 10 years.

1999-2005 Desktop Publishing, The Labor Institute on a contract basis

2006-present Desktop Publishing/Production Coordinator/Administrative Assistant, The Labor Institute (now ISWE)

Assisted in co-authoring the Labor Institute 10- and 30-hour OSHA training book and the 2009 GCC Powered

#### (b)(6)

## M.S., CHS-V, CET, RPIH

Homeland Security, Environmental, Occupational Health and Safety Specialist 21 Fletcher Lane Hollis, NH 03049

Home Phone: 603-465-2012 Cell Phone: 603-689-4225 Mizulallc@charter.net

#### **EXPERIENCE SUMMARY:**

Since 1997, Mr. (b) (6) has been providing homeland security, environmental, occupational safety and health, emergency and disaster preparedness, incident command system (ICS), hazardous waste and hazardous materials consultation and training. He received his formal industrial hygiene education from the University of Massachusetts (UMass) Lowell's Work Environment Department, where he earned his M.S. Degree in Industrial Hygiene. The degree program heavily emphasizes preventive work practices, with a focus on developing safe work practices and procedures, and using effective engineering controls to reduce work place injuries and hazards.

Mr. (b) (6) currently owns Mizula, LLC; a broad based provider of Homeland Security, Environmental, and Occupational Health and Safety consulting and training services. Current and past clients include: National Institute of Environmental Health Sciences (NIEHS), International Union of Operating Engineers (IUOE), International Association of Fire Fighters (IAFF), and the City of San Francisco Municipal Workers.

For eight of his fourteen years of experience Mr. (b) (6) has worked with The New England Consortium (TNEC), based at UMass Lowell. With TNEC, he worked with consortium members, including the New England Committees on Occupational Safety and Health (COSH groups) by providing occupational safety and health needs-based safety evaluations and safety training programs. In addition, his safety work includes conducting focused health and safety reviews for compliance with regulations, guidelines and standards of the Occupational Safety and Health Administration (OSHA), American National Standards Institute (ANSI), National Fire Protection Association (NFPA), and National Safety Council (NSC).

Thus far, Mr. (b) (6) has trained over 7,000 workers in various health and safety, emergency response and homeland security courses.

Mr. (b) (6) has supported multiple consulting companies including RSP Associates Inc., The Lippy Group, LLC, MDB Inc., and ECS. Tasks performed for these companies include work in all rubrics of occupational safety and health and homeland security.

Mr. (b) (6) possesses a broadly developed skill base with the ability to refresh or update skills depending on the needs of a specific job. It is a continuing practice for Mr. (b) (6) to develop professionally including: new or updated credentials and license's, attending conferences, learn new professional and computer skills as well as update and practice good customer and employee relationship skills.

Experience: 14 years

#### **Education:**

- M.S., Industrial Hygiene, University of Massachusetts Lowell,
- B.A., Environmental Science and Policy, Clark University, 1997
- A.S., Environmental Science and Technology, Holyoke Community College, 1994

#### Certificates and Licenses:

- Certified Environmental Trainer in Occupational Safety/health and Emergency Response No. 22-071, National Environmental Training Association
- Registered Professional Industrial Hygienist, No. 08840903, Association of Professional Industrial Hygienist
- Disaster Team Member, American College of Forensic Examiners International
- Certified in Homeland Security-Level-V, American College of Forensic Examiners International, No. 102077

Sitting for CIH exam in 10/2009

Qualified to take CSP exam

Fulfilled EPA specific Asbestos and Lead training requirements for inspection, management, project design and abatement

#### His specific work experience includes:

- Performing workplace vulnerability assessments;
- Providing hazardous materials, emergency preparedness, homeland security, CBRNE and Weapons of Mass Destruction (WMD) training;
- Conducting hazard assessments and hazard evaluations;
- Working with Safety Committees and COSH Groups;
- Conducting Job Hazard Analysis (JHAs);
- Perform Environmental and Occupational Health and Safety Audits;
- Develop Environmental and Occupational Health and Safety Programs, Plans and Standard Operating Procedures;
- Indoor Air Quality;
- Hazardous Materials and Hazardous Waste Management and Compliance Assistance;
- Training course curriculum development and delivery; and
- Providing Contingency Plan and Emergency Response consulting support to Federal agencies, unions, colleges, hospitals medical research facilities.

#### **REPRESENTATIVE PROJECTS:**

National Institute of Environmental Health Sciences (NIEHS) and the National Clearinghouse for Health and Safety, Research Triangle Park, NC. Developed Avian Influenza, Radiological Dispersion Device (dirty bomb), Wildfire, Chemical Weapons and Earthquake training tools to be implemented in the event of the National Response Framework activation for the mentioned disasters. Process of development for the tools included researching appropriate topics with regard to current federal interagency standards and guidance, developing the training tool, leading focus group review committees of stake holders and updating training tools based on review committee input. Currently serves on the NIEHS deployment team for National Response Framework disasters.

#### International Union of Operating Engineers (IUOE), Beckley, WV.

Developed 8 hour HAZWOPER Site Worker Supervisor course tailored to the IUOE membership. Developed Green Jobs and Green Chemistry Awareness modules. Reviewed and edited IUOE materials for radiation and RDD content. In collaboration with The Lippy Group, LLC, developed and delivered three Master Instructor "Pocket Guide" training courses. Developed electrical and fall hazard training materials for the Focus Four Construction Hazards which was adopted by OTI headquarters for their use nationally. Developed asbestos abatement worker/supervisor and Inspector training course and materials. Developed and delivered 40hr industrial hygiene training course and green jobs/green chemistry course. Developed 24hr Radiological Worker II course and delivered pilot to 16 workers.

University of Massachusetts of Lowell, The New England Consortium, Lowell, MA. Delivered HAZWOPER training courses to site workers, industrial workers, university employees and first responders, including New England Police and Fire Departments, PSNH utility workers, Tufts University, University of Rhode Island, New England Regional Health Officers, Region 1 OSHA inspectors, New England Regional Department of Homeland Security personnel and private and public industries. Besides training, he also designed, developed and updated the Consortium's course offerings and curriculum.

# Professional Affiliations:

- The New England Consortium (TNEC) Advisory Board Member
- \* NHCOSH
- American College of Forensic Examiners International
- American Industrial Hygiene Association
- National Environmental Safety and Health Training Association
- American Board of Industrial Hygiene
- National Institute of Environmental Health Sciences

#### Regulatory Experience:

- ❖ CERCLA
- ❖ RCRA
- ❖ OSHA
- ❖ DHS
- State
- NFPA
- ANSI
- Local

#### **Training Delivered:**

- Rated Master Trainer under current Department of Homeland Security criteria
- OSHA 40-Hour HAZWOPER Course
- OSHA 8-Hour Supervisor Training Course
- OSHA 24-Hour Technician Training Course
- OSHA 8-Hour Incident Command System Training
- HAZWOPER Awareness Training Courses
- CBNRE Awareness Training
- National Incident Management System Training (NIMS)
- OSHA Blood Borne Pathogens Training
- DOT Hazardous Materials Training
- Machine Guarding Training
- OSHA Confined Space Entry Training Course
- OSHA Trenching/Excavation Training Course
- OSHA Forklift Safety Training Course
- OSHA Crane Safety and Material Handling Training Course
- OSHA Respiratory Training
- Ergonomics- Training Course

#### LIUNA (formally Laborers-AGC), Pomfret CT.

Developed 24 hour custom Disaster Response Worker course which satisfied the OSHA 7600 course. Created modules specific for Laborers disaster work. Course included hands on activities with respiratory protection, PPE and decontamination. Delivered 24 hour Disaster Response Worker pilot course for 24 laborers at their Pomfret CT training center. Developed white paper on Disaster Site Worker training.

City of Nashua Municipal Workers, Nashua, NH. Designed and delivered annual 8-hour spill response refresher courses for Nashua Municipal Workers. Job categories trained included transportation workers, solid waste workers and roadway and grounds crews. Courses were designed to cover and address the specific health and safety issues that the city workers face.

City of San Francisco Municipal Workers, San Francisco, CA. Delivered 4hr Hazcom training to over 550 SFMUNI employees. Developed and delivered custom 16hr HAZWOPER operations course to 56 SFMUNI employees. Coordinated with SFMUNI Health and Safety to custom tailor two 24-hour spill response course and two 8-hour supervisor courses. Conducted a three day site visit of SFMUNI facilities to assess potential spill response and safety issues to further revise the SFMUNI training curriculum.

Maratech Engineering Services Inc., Hanscom AFB, MA. Developed and delivered three 8-hour HAZWOPER refresher courses for employees. Courses were customized to the clients needs by performing a needs analysis before curriculum was developed. Reviewed and delivered technical critique of Lead Program and Integrated Contingency Plan. Performed a gap analysis of Maratech's health and safety needs based on relevant standards and developed a priority list to bring the company into compliance. Mr. Mizula is currently working on developing their health and safety programs including a Respiratory Protection Program, HAZWOPER Program, PPE Program and Hazcom Program.

Massachusetts HAZMAT Teams, MA. Created and delivered three courses for the MA-HAZMAT Team annual conference, 2000, 2001, 2004 & 2005. One of the courses was instruction on the application of CDS Weapons of Mass Destruction Kit. The second course was a "hands on" instructional session on the Dieter-Hienz Kit. The third course was a "hands on" introduction to the Quick Silver weapons of mass destruction sampling kit. In all, roughly 150 HAZMAT team members were trained between the three courses. Also routinely provided Emergency Response training and full-scale drills to Region 6 Hazmat Team. The full-scale drills focus on safety procedures to reduce the exposure possibility for acute safety hazards, such as explosions from flammable chemicals and acute chemical exposures due to PPE and equipment failure or work practices.

# Connecticut Association of Public Health Officer Directors, Hartford, CT. Facilitated training on the National Incident Management System

(NIMS) and Incident Command System (ICS) related to the Connecticut Association of Public Health Officer agency. Among the topics included was the Connecticut Public Health Officer involvement in small and large-scale emergency operations in conjunction with local and regional fire and police departments, state agencies and federal agencies such as FBI and DHS. Invited back for three years to present material to this group.

Created and delivered various Train-the-Trainer Courses for above listed subjects

Funding Source	Name	Dates	Amount
NIEHS-EPA/DOE, through OCAW	Hazardous Waste Worker Training Prog.	1995-1996	\$487,063
NIEHS-EPA/DOE, through OCAW	Hazardous Waste Worker Training Prog.	1996-1997	\$417,538
NIEHS-EPA/DOE, through OCAW	Hazardous Waste Worker Training Prog.	1997-1998	\$397,534
NIEHS-EPA/DOE, through OCAW	Hazardous Waste Worker Training Prog.	1999-1999	\$417,538
NIEHS-EPA/DOE, through PACE	Hazardous Waste Worker Training Prog.	1999-2000	\$483,370
NIEHS-EPA, through PACE	Hazardous Waste Worker Training Prog.	9/00-8/01	\$349,395
NIEHS-EPA, through PACE	Hazardous Waste Worker Training Prog.	9/01-8/02	\$335,000
NIEHS-EPA, through PACE, Supplement	Hazardous Waste Worker Training Prog.	9/01-8/02	\$46,500
NIEHS-EPA, through PACE	Hazardous Waste Worker Training Prog.	9/02-8/03	\$335,000
NIEHS-EPA, through PACE	Hazardous Waste Worker Training Prog.	9/03-8/04	\$342,101
NIEHS-EPA, through USW	Hazardous Waste Worker Training Prog.	9/04-8/05	354,439
NIEHS-EPA, through USW	Hazardous Waste Worker Training Prog.	9/05-8/06	389,349
NIEHS-EPA, through USW	Hazardous Waste Worker Training Prog.	9/06-8/07	\$407, 54
NIEHS-WMD, through USW	Weapons of Mass Destruction Training	9/04-8/05	52,718
NIEHS-WMD, through USW	Weapons of Mass Destruction Training	9/05-8/06	121,217
NIEHS-WMD, through USW	Weapons of Mass Destruction Training	9/06-8/07	114,515
NIEHS-DOE, through PACE	Hazardous Waste Worker Training Prog.	9/00-8/01	\$270,164
NIEHS-DOE, through PACE	Hazardous Waste Worker Training Prog.	9/01-8/02	\$257,204
NIEHS-DOE, through PACE	Hazardous Waste Worker Training Prog.	9/02-8/03	\$257,204
NIEHS-DOE, through PACE	Hazardous Waste Worker Training Prog.	9/03-8/04	\$256,51.
NIEHS-DOE, through USW	Hazardous Waste Worker Training Prog.	9/04-8/05	256,513
NIEHS-DOE, through USW	Hazardous Waste Worker Training Prog.	9/05-8/06	363,029
NIEHS-DOE, through USW	Hazardous Waste Worker Training Prog.	9/06-8/07	391,636
OOL, Rutgers University	Health and Safety Training	1996	\$29,250
OOL, Rutgers University	Health and Safety Training	1997	\$65,703
OOL, Rutgers University	Health and Safety Training	1998	\$42,057
OOE through PACE	DOE Medical Surveillance Project	5/1/98-1/31/99	\$71,000
DOE through PACE	DOE Medical Surveillance Project	2/1/99-12/31/99	\$26,277
DOE through PACE	Mound DOE Medical Surveillance Project	9/99-12/00	\$40,000
DOE through PACE	DOE Medical Surveillance Project	5/00-4/01	\$138,278
DOE through PACE	DOE Medical Surveillance Project	9/01-11/02	\$76,489
DOE through PACE	DOE Medical Surveillance Project	12/02-6/03	\$70,097
DOE through PACE	DOE Medical Surveillance Project	2003-2004	\$70,174
DOE through PACE	DOE Medical Surveillance-Idaho Falls	7/00-6/01	\$99,007
OOE through PACE	DOE Medical Surveillance Project	01-02	76,489
OOE through PACE	DOE Medical Surveillance Project	02-03	70,097
OOE through PACE	DOE Medical Surveillance Project	03-04	67,313
OOE through PACE	DOE Medical Surveillance Project	05-06	38,185
OOE through PACE	DOE Medical Surveillance Project	06-07	60,184
OSHA through PACE	Whistleblower	2000	\$20,000

OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	9/00-8/01	\$164,040
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/01-9/02	\$131,825
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/02-9/03	\$131,825
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/03-9/04	\$141,000
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/04-9/05	\$140,084
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/05-9/06	\$140,084
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/06-9/07	\$140,084
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/07-3/08	No cost Extension
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	4/09-3/10	\$144,946
OSHA through UWUA	OSHA Susan Harwood Targeted Training	2001-02	\$110, 090
OSHA through UWUA	OSHA Susan Harwood Targeted Training	2002-03	\$78,440
NIEHS through Carpenters Union	SODS/World Trade Center Project	5/02-1/03	\$90,000
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/03-9/04	\$80,804
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/04-9/05	\$66,048
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/05-9/06	\$112,564
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/06-9/07	No cost Extension
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/07-9/08	\$110,352
OSHA through GCC/IBT	OSHA Susan Harwood, Inst. Competency.	04/09-03/09	\$14,946
	ISWE		
OSHA through GCC/IBT	OSHA Susan Harwood, Material Handling including Cranes, Hazardous Materials and Slings.	10/10-09/11	\$88,243 (09/10)
OSHA IL GOC/IDT	OCHA C. H. L. L. L. L. C. L. C.	04/10-03/11	No Cost
OSHA through GCC/IBT	OSHA Susan Harwood, Institutional Competency.	00/10 07/11	Extension
NIEHS through UWUA	NIEHS Hazardous Waste Worker	08/10-07/11	\$194,241

The chart below lists federal and state grants received since 1995 and managed by Renner and Anderson.

Funding Source	Name	Dates	Amount
NIEHS-EPA/DOE, through OCAW	Hazardous Waste Worker Training Prog.	1995-1996	\$487,063
NIEHS-EPA/DOE, through OCAW	Hazardous Waste Worker Training Prog.	1996-1997	\$417,538
NIEHS-EPA/DOE, through OCAW	Hazardous Waste Worker Training Prog.	1997-1998	\$397,534
NIEHS-EPA/DOE, through OCAW	Hazardous Waste Worker Training Prog.	1999-1999	\$417,538
NIEHS-EPA/DOE, through PACE	Hazardous Waste Worker Training Prog.	1999-2000	\$483,370
NIEHS-EPA, through PACE	Hazardous Waste Worker Training Prog.	9/00-8/01	\$349,395
NIEHS-EPA, through PACE	Hazardous Waste Worker Training Prog.	9/01-8/02	\$335,000
NIEHS-EPA, through PACE, Supplement	Hazardous Waste Worker Training Prog.	9/01-8/02	\$46,500
NIEHS-EPA, through PACE	Hazardous Waste Worker Training Prog.	9/02-8/03	\$335,000
NIEHS-EPA, through PACE	Hazardous Waste Worker Training Prog.	9/03-8/04	\$342,101
NIEHS-EPA, through USW	Hazardous Waste Worker Training Prog.	9/04-8/05	354,439
NIEHS-EPA, through USW	Hazardous Waste Worker Training Prog.	9/05-8/06	389,349
NIEHS-EPA, through USW	Hazardous Waste Worker Training Prog.	9/06-8/07	\$407, 54
NIEHS-WMD, through USW	Weapons of Mass Destruction Training	9/04-8/05	52,718
NIEHS-WMD, through USW	Weapons of Mass Destruction Training	9/05-8/06	121,217
NIEHS-WMD, through USW	Weapons of Mass Destruction Training	9/06-8/07	114,515
NIEHS-DOE, through PACE	Hazardous Waste Worker Training Prog.	9/00-8/01	\$270,164
NIEHS-DOE, through PACE	Hazardous Waste Worker Training Prog.	9/01-8/02	\$257,204
NIEHS-DOE, through PACE	Hazardous Waste Worker Training Prog.	9/02-8/03	\$257,204
NIEHS-DOE, through PACE	Hazardous Waste Worker Training Prog.	9/03-8/04	\$256,513
NIEHS-DOE, through USW	Hazardous Waste Worker Training Prog.	9/04-8/05	256,513
NIEHS-DOE, through USW	Hazardous Waste Worker Training Prog.	9/05-8/06	363,029
NIEHS-DOE, through USW	Hazardous Waste Worker Training Prog.	9/06-8/07	391,636
OOL, Rutgers University	Health and Safety Training	1996	\$29,250
OOL, Rutgers University	Health and Safety Training	1997	\$65,703
OOL, Rutgers University	Health and Safety Training	1998	\$42,057
DOE through PACE	DOE Medical Surveillance Project	5/1/98-1/31/99	\$71,000
OOE through PACE	DOE Medical Surveillance Project	2/1/99-12/31/99	\$26,277
OOE through PACE	Mound DOE Medical Surveillance Project	9/99-12/00	\$40,000
OOE through PACE	DOE Medical Surveillance Project	5/00-4/01	\$138,278
OOE through PACE	DOE Medical Surveillance Project	9/01-11/02	\$76,489
OOE through PACE	DOE Medical Surveillance Project	12/02-6/03	\$70,097
DOE through PACE	DOE Medical Surveillance Project	2003-2004	\$70,174
DOE through PACE	DOE Medical Surveillance-Idaho Falls	7/00-6/01	\$99,007
DOE through PACE	DOE Medical Surveillance Project	01-02	76,489
OOE through PACE	DOE Medical Surveillance Project	02-03	70,097
DOE through PACE	DOE Medical Surveillance Project	03-04	67,313
DOE through PACE	DOE Medical Surveillance Project	05-06	38,185
DOE through PACE	DOE Medical Surveillance Project	06-07	60,184
OSHA through PACE	Whistleblower	2000	\$20,000

OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	9/00-8/01	\$164,040
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/01-9/02	\$131,825
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/02-9/03	\$131,825
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/03-9/04	\$141,000
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/04-9/05	\$140,084
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/05-9/06	\$140,084
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/06-9/07	\$140,084
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	10/07-3/08	No cost Extension
OSHA through GCIU	OSHA Susan Harwood, Inst. Competency.	4/09-3/10	\$144,946
OSHA through UWUA	OSHA Susan Harwood Targeted Training	2001-02	\$110, 090
OSHA through UWUA	OSHA Susan Harwood Targeted Training	2002-03	\$78,440
NIEHS through Carpenters Union	SODS/World Trade Center Project	5/02-1/03	\$90,000
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/03-9/04	\$80,804
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/04-9/05	\$66,048
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/05-9/06	\$112,564
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/06-9/07	No cost Extension
OSHA through UWUA	OSHA Susan Harwood Targeted Training	10/07-9/08	\$110,352
OSHA through GCC/IBT	OSHA Susan Harwood, Inst. Competency.	04/09-03/09	\$14,946
	ISWE		
OSHA through GCC/IBT	OSHA Susan Harwood, Material Handling including Cranes, Hazardous Materials and Slings.	10/10-09/11	\$88,243 (09/10)
OSHA IL GOC/IDT	OCHA C. H. L. L. L. L. C. L. C.	04/10-03/11	No Cost
OSHA through GCC/IBT	OSHA Susan Harwood, Institutional Competency.	00/10 07/11	Extension
NIEHS through UWUA	NIEHS Hazardous Waste Worker	08/10-07/11	\$194,241

#### **Appendix:** Health and Safety Programs Structural Disharmony

All work place have systems in place that are designed to prevent accidents. These systems are layered upon and integrated into the production, manufacturing and all other processes employed by the industry involved. This arrangement is universal throughout the world. Any safety engineer walking into a facility would be able to readily identify a variety of these systems. Ideally they are redundant and multi-layered. Accordingly, for an accident to occur, a number of systems must fail simultaneously.

Think of a series of shuffled pieces of Swiss cheese aligned one after another, each representing a system or barrier to an accident. In order for the accident to occur all the holes in each of the pieces of cheeses would have to align up at exactly the right time. This type of alignment should be a rare occurrence, but it is not. Why? A facility may have all necessary systems in place but they are not properly maintained. Or the systems are defeated or overridden to achieve production demands. Or perhaps some basic systems are not in place at all. For example a system of guards may be installed on a piece of moving equipment (mitigation system) in order to prevent workers from being pulled into the machine. Any number factors might conspire to defeat this system such as the guards being removed to perform maintenance or adjustment to the machine, or lack of maintenance that allow the guards to fail, or perhaps no guards at all on certain sections of the machine.

Safety programs are a part of site safety systems. These programs are designed to help workers and management recognize, avoid and abate hazards. Most of these programs are introduced at different times by different management teams. Each program is envisioned as being the "magic bullet" that is going to reduce and/or eliminate accidents and injuries. There is little or no understanding of how these programs interact with other site systems, little or no understanding of the underlying site safety systems that exist and lack of coherent understanding on the existence of the nature and function of safety systems. Additionally, workers and management have no common language shared philosophy or vision of how to use concepts like OSHA's higherarchy of control as a practical application of these principles.

For example most sites have near miss programs but most only examine the actions and conditions directly preceding the incident. This approach of viewing an incident in a narrow direct cause and effect method is of limited value in achieving long term and structural prevention.

Narrow disjointed safety programs and lack of understanding of underlying safety systems is the major failure of the safety paradigm as currently practices. This is not to suggest that current programs are not effective to some degree but the objective here is to go beyond current construct, to move beyond what is just required by regulation and to foster a cooperative and coherent approach to safety that both management and workers can engaging in. "Systems of Safety" is just such an approach. Pioneered by the Oil Chemical and Atomic Workers Union it grew out of our experience with process safety management. Over the last 15 years we have developed tools to train workers and management on the application of safety systems to their process. It became apparent in our work with other unions in a verity of industrial and other work settings that the applications of these principles were universal. By that we mean that all work sites, be it a chemical plant, a steel mill, a news paper printing facility, a paper plant and auto plan or a paper mill or a power generating utility employ safety

systems. These systems are universal; all have preventative maintenance systems, procedures systems, mitigation systems, alarms and warning systems and systems of design and engineering.

But although they all have systems not all systems are applied universally, something even within the same corporation. For example a system may not be properly maintained or not installed at all. Or overdependence on a system subject to high rates of failure such as procedures in place of a much more preventative approach such as designing out a particular hazard from a process. These are just a few of the issues that need to be addressed when it comes to attempting to manage site hazards and prevent accidents and injuries.

Systems of Safety programs provide the bases for bringing coherences to sites programs. Systems of safety teaches management and workers how to identify their site safety systems, to determine if adequate systems are in place and maintained, and to analyze if the highest level of protection is being achieved by a given system or if a higher level of protection is available. It also provides workers and management with a common language in which to converse about site safety. A common language and agreement of what constitute site safety systems is the bases allows for the application of systems based health and safety programs. Without such language an agreement often times management and workers find themselves working at cross-purposes in an adversely atmosphere. Our experience with introducing these approaches proves that the introduction of these core principles is the foundation upon which increased prevention can be achieved. And that there is wide acceptance and internalization of the concepts.

Programs are now based in a common philosophy of systems of safety. It is understood that all accidents and incidents are caused by a failure of site safety systems be they a failure of applying a regulatory requirement or a failure to apply good engineering practices. Systems based safety programs equip workers and managers to identify, proactively, not only the hazards but the underling flaws in site systems, enables them to use a common language to name these flaws such as a failed or missing guard as a failure in the mitigation and perhaps maintained and inspection system. And it provides a mechanism for analyzing accidents and near misses in a non blame atmosphere and helps accomplish fixing underlying structural deficits not only at the source of the incident but in other similar site systems as well. This all leads to safer work places.



# Activity 5: Incident Investigation using Root Cause Analysis

1. How important is this Activity for workers? Please circle one number.

Activity Is Not Important				Activity Is Very	Important
1	2	 3	4	5	

2. Which factsheets are the most important to distribute to the workers? (Please list the page numbers.)

3. What would you suggest be done to improve this Activity?

# RETURN TO H&S DEPARTMENT

## TRAINING REPORT BACK FORM

1.	Local:	Company:
	No. in Class:	Type of Class:
	Date:	Trainers:
	nat were the most important another page, if necessary)	health and safety problems raised by the class?
3. <b>W</b> I	hat specific issues require fo	ollow-up? What kind of follow-up is required?
4.	workbook that you had to	raised by any of the activities or covered by the discuss at some length with the class? If so, during scussion occur? And what did you have to talk

5.	Were there any new points that came up in the course of the training that should be incorporated into an activity's list of summary points? (Be sure to mention the activity as well as the point or points)
6.	How many people in the class had English literacy problems? a) Number with reading problems?:
	b) Number with writing problems?:
	What additional steps, if any, did you have to take in class to help people with these problems?
7.	Did something happen in your class that will change health and safety conditions in the workplace in your opinion?
8.	What was your overall impression of the class? Were students interested? Are there any particular comments you would like to make? Any areas that need improvement? Etc.