



**Special Project**  
**Status of DuPont Occupational Health and**  
**Safety Program Recommendations**  
**As of December 31, 2015**

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**City of Tulsa Internal Auditing**  
**April 2016**



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**Status of DuPont Occupational Health and**  
**Safety Program Recommendations**  
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Ron Maxwell, CIA, CFE  
Chief Internal Auditor

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Cathy Criswell, CPA, CIA  
City Auditor

**AUDIT TEAM:**

Steve Jackson, CPA, Manager  
Steve Wagner, Senior Auditor

## **Introduction**

In April 2012, DuPont consultants issued a report on their study of “The City of Tulsa Occupational Health and Safety Program Assessment” (Assessment). The background and assessments for their study of the City’s safety culture included data analysis of injury claims and reports, document review of accident investigations and safety inspections, a Safety Perception Survey and interviews with City managers and employees, and an assessment of various City work sites including City Hall.

The Assessment disclosed the City’s OSHA recordable injury rate was much higher than the average reported for US Local Government Services between 2008 and 2010. Workers Compensation costs to the City were \$10.8 million in 2010.

The Safety Perception Survey indicated that employees had a very low level of involvement in the City’s safety efforts and a large percentage reported they received no formal, structured safety training during their past year of service.

A field assessment of work sites and City Hall disclosed department leaders spent very little time in the field interacting with the employees about safety matters. There were no safety goals and action plans and there was a limited understanding of current safety performance.

## **Scope and Objectives**

The scope of this review was limited to determining if City Management and the Human Resources Department, Safety Division agreed with the DuPont study recommendations. This review also reports on the corrective actions taken by the City to implement and integrate the recommendations into the City’s safety culture.

## **Summary and Conclusion**

The City of Tulsa implemented an official Safety Culture Transformation Project that began in April 2013. The Human Resources Department, Safety Division reports that corrective actions to all 31 recommendations included in the DuPont Assessment have either been completed or are in process of being implemented into the City’s Safety Culture.

Recommendations Summary, Current Status and Action Items are detailed in the following pages. Additional follow up reviews planned by Internal Auditing are shown in the Action Items column.

## **Response from Human Resources Safety Division**

In 2014, Human Resources conducted a survey of our employees regarding safety culture. The survey focused on three areas; safety culture, recognition, and leadership involvement. The responses showed that approximately 50% of employees recognized the importance of placing value on safety culture; 20% of the employees felt the City recognized safety achievement/performance; and 34% of the leadership had been involved with a safety committee or meeting in the last two years. Clearly we are making headway, but still have a way to go.

<b>Recommendations</b>	<b>Status</b>	<b>Action Items</b>
<p><b>The City should clearly define the criteria for evaluating current safety performance and then set measurable, realistic year-end goals for improvement. All departments should be required to do the same in an effort to support the safety goals of the City.</b></p>	<p><b>In Process:</b> This is an ongoing process that began with the official Safety Culture Transformation Project. The Human Resources Department is tracking injury safety performance for all departments. City Departments are being held responsible for the various components of this project in accordance with the project plan. To date, this included injury investigation, job hazard analysis and hazard mitigation, the STAR recognition program and safety training. City departments have provided the Safety Division with their departmental goals and projected dates of completion.</p>	<p>Internal Auditing will review the goals and projected progress that has been submitted to the Safety Division by City departments to determine if the departments have set safety goals and action plans and have communicated their goal progress to the Human Resources Department.</p>
<p><b>Revise Personnel Performance Review (PPR) forms for all City employees so that safety performance, as measured against the City’s safety goals, becomes an integral part of promotions and pay decisions.</b></p>	<p><b>Completed:</b> PPR forms include a performance section with a rating for the employee to take personal responsibility to attend safety training, apply and adhere to safety policies and standards, and eliminate or report safety hazards. Additionally, employees sign an affidavit “Our Safety Commitment” attachment to their completed and approved PPR.</p>	
<p><b>Site/department managers and supervisors should regularly participate in pre-shift meetings to show leadership and provide safety communications and overviews of safety statistics.</b></p>	<p><b>In Process:</b> Safety Division recommends that pre-shift meetings include a daily safety contact as well as all official meetings begin with a safety contact. Additionally, Safety Division recommends that routine managerial safety contacts should be part of the annual evaluation of managers and supervisors in their PPRs.</p>	<p>Internal Auditing will discuss with the Safety Division how they plan to determine if managers and supervisors are fulfilling their pre-shift meeting safety contact duties.</p>
<p><b>Link annual budgetary planning to include the cost of injuries as department/section budget line items to increase departmental awareness and demonstrate that safety can be managed as any other expenditure.</b></p>	<p><b>In Process:</b> Finance has re-allocated injury costs back to each department based on their past three-year average of claims experience. This practice shows each department their percentage of total injury cost. It should be noted that injury costs are for information only and departments’ actual budgets have not been reduced for injury costs.</p>	<p>Internal Auditing will review planning for the new financial system to determine if the new budget process will include cost of injuries.</p>

<p><b>City Hall executives and department heads should be trained on the fundamentals of safety leadership and safety management in order to utilize safety metrics and actively participate in their department's safety program.</b></p>	<p><b>Completed:</b> Management training was done in the initial phase of the Safety Culture Transformation Project. Department Heads have participated in injury investigation training.</p>	
<p><b>All levels of management should have, understand and discuss monthly safety statistics with their employees on a routine basis. Each department should identify one or more high injury activities and develop action plans to reduce or eliminate the risk.</b></p>	<p><b>In Process:</b> Department heads are provided monthly updates of their injury statistics, including identification of specific high injury activity.</p>	<p>Internal Auditing will determine if each department has identified one or more high injury activities and has developed plans to reduce or eliminate the risk, and if Safety Division has developed ways to monitor departments' policy compliance. Internal Auditing will review implementation of the new Near-miss Program.</p>
<p><b>Each department should routinely perform injury frequency reviews, compare the results against existing policies and procedures and determine if modification of existing procedures or creation of new ones are needed.</b></p>	<p><b>In Process:</b> Non-sworn departments and the Safety Division staff are performing repeat injury reviews.</p>	<p>Internal Auditing plans to initiate a review of this process when the Safety Division has developed policies and procedures for reviewing how sworn and non-sworn departments address injury frequency.</p>
<p><b>Departments should upgrade or create new policies and procedures based on common work tasks and specifically designed safety precautions.</b></p>	<p><b>In Process:</b> Job Hazard Analyses were initiated for each recordable injury type in the nonsworn departments. All tasks were reviewed for potential job hazards. The analyses are used during the injury investigation process and as a future training tool.</p>	<p>Internal Auditing plans to review the Job Hazard Analysis process in a future audit project.</p>

<p><b>Job Hazard Analysis techniques should be used to periodically review and upgrade safe practices.</b></p>	<p><b>In Process:</b> The Job Hazard Analysis is part of the injury investigation process. Specific Job Hazard Analysis policies should be developed.</p>	<p>Internal Auditing plans to review the Job Hazard Analysis process in a future audit project.</p>
<p><b>After achieving an understanding of safety rules for each site’s working environment, create a one-page summary for each policy or procedure that can cover the fundamentals in five minutes or less.</b></p>	<p><b>Completed:</b> Supervisors and employees have been provided training on safety observation, coaching and planning. This recommendation was included in the training.</p>	
<p><b>Ensure documented rules and procedures are the standards by incorporating them in the inspection process. Deviation from the safety standard should be considered an unsafe action.</b></p>	<p><b>In Process:</b> Safety Specialists, Crew Leaders and Supervisors are responsible for performing scheduled on-site inspections. Inspection documentation and disclosed safety hazards are communicated to appropriate management and mitigated.</p>	<p>Internal Auditing will review the safety inspection process and evidence of management actions to identify and mitigate safety hazards.</p>
<p><b>Safety Department should have a process that ensures safety policies and procedures are up-to-date and based on current injury trends.</b></p>	<p><b>In Process:</b> The Safety Oversight Committee is responsible for reviewing and approving policy revisions and updates.</p>	<p>Internal Auditing will review the process for ensuring periodic review and update of safety policies and procedures.</p>
<p><b>Safety Division personnel should be assigned cross functional roles where, in addition to their functional duties, they assist a specifically assigned department director with safety issues and training.</b></p>	<p><b>Completed:</b> All departments have been assigned a Safety Division staff member to assist with safety related issues.</p>	
<p><b>Create a monthly safety meeting at the City Hall management level to report and discuss progress toward injury reduction goals, Safety Management Program implementation status and issues/concerns.</b></p>	<p><b>Completed:</b> The Safety Oversight Committee has been established by Executive Order and meets on a monthly basis.</p>	<p>An Internal Auditor will attend monthly Safety Oversight Committee meetings as a non-participating observer to remain up-to-date with operation of the Safety Management Program.</p>

<p><b>Create new departmental focused safety meetings that are integrated into the overall safety management effort. The meetings should review the department's current injury statistics, create new safety action plans and implement applicable recommendations from the DuPont Report.</b></p>	<p><b>In Process:</b> Department and work group safety committees are being set up as part of the overall Safety Culture Transformation Project.</p>	
<p><b>Train individual department personnel as safety meeting leaders to continue the safety meeting routine.</b></p>	<p><b>In Process:</b> Safety communications training has been performed and is an ongoing effort.</p>	<p>Internal Auditing will review departments' progress with safety training in a future audit project.</p>
<p><b>Establish a pilot safety networking project among the three raw water plants. Plan safety meetings and training where ideas and resource materials would be shared among the plants as an operating commonality.</b></p>	<p><b>In Process:</b> This is currently being addressed as a city-wide project instead of with a pilot group. The current safety committee hierarchy is the Safety Oversight Committee, departmental safety committees and workgroup safety committees.</p>	
<p><b>Train first-line and second-line supervisors on safety leadership and management skills including skills development in incident investigation and safety observations. Develop skills necessary for functional capability to facilitate changes.</b></p>	<p><b>Completed:</b> This training was initially done as part of injury investigation and Job Hazard Analysis training, and will continue with additional safety observation, coaching and training plans.</p>	
<p><b>Upgrade disciplinary policy and guidelines to specifically define discipline for safety violations including which safety rule violations qualify for cardinal rule actions.</b></p>	<p><b>Completed:</b> The Cardinal Rules of Safety have been established and approved. The Human Resources Department has maintained a log of discipline for safety rule violations over an 18-month period in order to identify trends by nature of the violations.</p>	<p>Internal Auditing will review the log of discipline for safety rule violations and management efforts to identify violation trends and provide plans for corrective action.</p>
<p><b>Establish a learning and development program focused on employee safety and health that is led by a centralized organization and executed in the field.</b></p>	<p><b>Completed:</b> The Safety Culture Transformation Project functions as the learning and development program for this recommendation.</p>	

<p><b>Institutionalize a “top-down” proven Safety Training and Field Observation initiative which focuses on behavior, leadership, employee involvement and safe-work practices.</b></p>	<p><b>In Process:</b> Safety observation, coaching and planning have been implemented to train supervisors and frontline employees. Future training is planned for department heads and managers.</p>	
<p><b>Provide training tools such as DVDs, PowerPoint presentations and employee handbooks to encourage employee participation at tailgate meetings.</b></p>	<p><b>Completed:</b> The City has a fairly large library of safety training videos/DVDs. Safety contact information is sent to department managers for use in tailgate meetings. The MyFoundation materials also provide safety training messages and tools.</p>	
<p><b>Implement a City-wide Learning Management System to ensure training requirements are met, learning and development assignments are consistent and documentation is automated and efficient.</b></p>	<p><b>In Process:</b> Safety training is utilizing the Training Partner learning management system.</p>	
<p><b>The On-Site Inspection process should be upgraded by revising forms and training supervisors on follow-up and trending.</b></p>	<p><b>Completed:</b> Forms have not been revised but the Safety Observation, Coaching and Planning class includes the recommended training.</p>	
<p><b>Align safety inspections at each department/section with activities and actions causing injuries.</b> Use safety inspections as a management tool to enforce policies and procedures as well as raise awareness of at-risk activities.</p>	<p><b>In Process:</b> Safety inspections accomplish some standard procedures as well as customized procedures based on injury history and non-compliance.</p>	<p>Internal Auditing will review the policies and procedures of the safety inspection process and the resultant follow-up interaction process with management for necessary safety standard revision.</p>
<p><b>Include Claims Analysts, who are knowledgeable of workplace hazards, in the safety observations process.</b></p>	<p><b>Completed:</b> The Human Resources Department stated that communication between the Claims Analysts and Safety Specialists is fluid.</p>	
<p><b>After completing Safety Fundamentals Training, provide first-line supervisors, who are responsible for filling out reports, with full Incident Investigation/Basic Root Cause Analysis Training.</b></p>	<p><b>Completed:</b> This recommendation was implemented with Injury Investigation/Root Cause Analysis Training being provided to all supervisors and managers.</p>	



<p><b>The City should develop quality metrics for accident investigation reports (cause determination and recommendations) and enforce quality standards by rejecting substandard accident reports. Key accident report findings should be shared with similar departments and sites so findings can be shared during safety meetings, safety inspections and discussions with employees.</b></p>	<p><b>Completed:</b> A form (905 Form) has been developed for investigating injuries. Completion of the web-based 905 Form requires involvement of the employee, supervisor, manager and director if the injury is determined to be OSHA recordable.</p>	<p>Internal Auditing will review a sample of completed 905 Forms for compliance with required standards. Policies and Procedures for sharing report findings with similar departments and sites will be included in the recommendation review.</p>
<p><b>Create a safety reward and recognition program that would be supported by the employees. The program should be based on measurable results against the site's safety goals.</b></p>	<p><b>Completed:</b> The City has created the STAR safety recognition program that is open to all departments and designed to recognize employees at all levels.</p>	
<p><b>Create a three-prong strategy to improve post-injury management of injury claims.</b></p>	<p><b>Completed:</b> Three programs have been initiated to implement this recommendation; the At-Risk Program, the Transitional Duty Program and the Workers Compensation Settlement Review Process.</p>	<p>Internal Auditing will review policies and procedures to evaluate the success of injury repeater tracking and resolution.</p>
<p><b>The City should implement a strategy for safety improvement in areas of safety leadership, safety management structure, safety processes, performance management and post-injury management.</b></p>	<p><b>Completed:</b> Items from this recommendation are included in the current policies and procedures.</p>	

## **Distribution List**

Mayor  
Councilor, District 1  
Councilor, District 2  
Councilor, District 3  
Councilor, District 4  
Councilor, District 5  
Councilor, District 6  
Councilor, District 7  
Councilor, District 8  
Councilor, District 9  
Mayor's Chief of Staff  
City Manager  
Press Secretary  
Maximizing and Advancing Performance Office  
Finance Director  
Senior Administrative Services Officer  
Council Administrator  
Council Secretary  
External Auditor  
Manager, Development Programs Administration  
Senior Safety Coordinator  
Mayor's Advisory Audit Committee