

Massachusetts Bay Transportation Authority

Safety Update: Workplace Safety

Fiscal and Management Control Board

March 8, 2021

Ronald Ester, Chief Safety Officer

Nancy Prominski, Chief Environmental and Health Officer

Kate LeGrow, Director Occupational Health Services

Agenda

- Occupational Health and Safety (OHS)
 - Program update
 - Written program approval
 - Implementation
 - Training
 - Tracking
 - Worker injuries
 - Internal reporting, tracking, and management
 - OSHA reportable, recordable, 300A Summary
- Conclusion



OHS Programs and OSHA Standards

- In 2019, the MBTA and other public agencies in MA became subject to OSHA standards:
 - Mass Executive Order
 - DLS law (MGL 149 Sec 6 ½) and requirements amended; OSHA set as minimum standard
- **ACTION: the MBTA must update and implement safety programs to be consistent with OSHA.**
 - MBTA Safety and OHS Workers' Compensation are:
 - Leading the effort to transform existing safety programs
 - Working together to track, manage, and report on OSHA recordable worker injuries



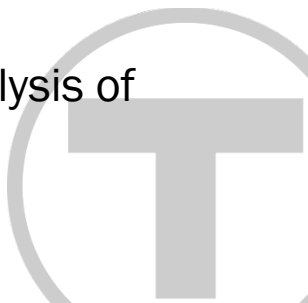
OHS Program Development

- Written Safety Program Schedule for SMRC Review and Approval in 2021:
 - OHS Plan
 - HazCom
 - Electrical Safety and LO/TO
 - Fall Protection
 - Hot Works
 - Confined Space Entry
 - Respiratory Protection
 - Hearing Conservation
- Safety Program Key Components:
 - Written plan, procedures, hazard assessments (Job Hazard Analyses, area assessments)
 - Training: specialized program training, task-based training
 - Documentation and Reporting: internal, OSHA 300/300A
 - Safety Assurance: program oversight and inspection (under development)



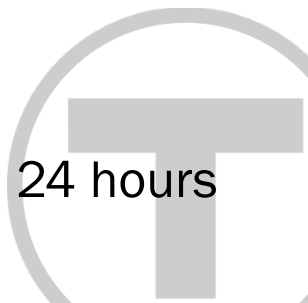
Worker Injury Management: Notification and Management Process

- Injured worker reports injury to Supervisor
- Depending upon severity of injury, first aid and/or transport to a medical facility may be provided
- Supervisor notifies OCC
- Employee must assist Supervisor in completing, and Supervisor must submit to OHS Workers' Compensation and Safety:
 - Employee injury report
 - Employer's 1st Report of Injury or Fatality (Form 101)
 - Accident Reporting and Medical Treatment (ART) Form (when employee is transported and/or seeks medical treatment)
- OHS Workers' Compensation enters information into Prognosis injury data/claims system, tracks information, submits 1st Report of Injury form to the State, manages WC claims, conducts employee return to work fitness for duty check
- OHS Medical Clinic conducts a return to work physical to ensure the employee is fit to return to work
- Safety also tracks data and coordinates with OHS Workers' Compensation on data compilation and analysis of trends, and reporting and communication
- Safety reports OSHA "reportable" injuries to DLS/OSHA



Worker Injury Management: Notification and Reporting

- Per OSHA requirements, the MBTA is required to:
 - Maintain records of all work-related OSHA recordable injuries and illnesses in an OSHA 300 log or equivalent form
 - OSHA work-related recordable injuries and illnesses are:
 - Death
 - Loss of consciousness
 - Days away from work
 - Restricted work activity or job transfer
 - Medical treatment beyond first aid
 - Any work-related case involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum
 - 29 CFR 1904.7 further defines other recordable injuries and illnesses
 - OHS Workers' Compensation collects and maintains this information in Prognosis.
 - Post-worker injury summaries equivalent to the OSHA 300A log for the previous calendar year between February 1 – April 30
 - Report verbally/online to DLS certain OSHA “reportable” injuries:
 - Fatality – must report within 8 hours
 - Amputation, loss of an eye, inpatient hospitalization/admission – must report within 24 hours



MBTA 2020 300A Summary Report

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2020U.S. Department of I
Occupational Safety and Health Admin

Form approved OMB no.

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>2</u>	<u>311</u>	<u>0</u>	<u>81</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>17,973</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of...			
(M)			
(1) Injury	<u>369</u>	(4) Poisoning	<u>0</u>
(2) Skin Disorder	<u>0</u>	(5) Hearing Loss	<u>1</u>
(3) Respiratory Condition	<u>3</u>	(6) All Other Illnesses	<u>21</u>

Establishment information

Your establishment name Massachusetts Bay Transportation AuthorityStreet 10 Park PlazaCity Boston State MA Zip 02116Industry description (e.g., Manufacture of motor truck trailers)
Mixed Mode Transit System

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)

OR North American Industrial Classification (NAICS), if known (e.g., 336212)

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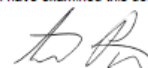
Employment information

Annual average number of employees 6,288Total hours worked by all employees last year 12,743,966

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.



Company executive

617-222-3200

Phone

General Manager
Title2/19/2021

Date

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Calculation and Comparison of Recordable Injury Rates

- MBTA 2020 Recordable Incident Rate (using 2020 300A data): 6.15
- MBTA 2020 DART (Days Away Restricted Transferred) Rate: 4.88
- MBTA 2020 Lost Time Rate: 4.88
- Bureau of Labor Statistics (BLS) 2019 rates* for urban transit are:
 - Total Recordable Rate: 6.5
 - DART Rate: 4.7
 - Lost Time Rate: 3.2
- **Summary:**
 - MBTA recordable injury rate is below the industry standard
 - MBTA DART rate is slightly above the industry average
 - MBTA lost time rate, however, is above the industry standard

* 2020 rates have not yet been published



Conditions Affecting Lost Time Rate

- Due to COVID-19, there are increased difficulty and significant delays in scheduling:
 - Medical appointments, medical treatment, PT
 - Follow-up or impartial medical examinations
 - DIA hearings – backlog up to 18 months
- Transit-related trauma:
 - Assaults on operators
 - Witnessing suicides and attempted suicides, which have been increasing
- The MBTA does not have a light duty, job restriction, or transfer program, so lost time days are higher
 - 29 collective bargaining units
- The MBTA employs many different trades with higher safety risks



Moving Worker Safety Forward

- 2020 – 1st year of electronically recording OSHA recordable injuries, illnesses and associated lost time in accordance with OSHA 300 requirements
 - Establishes a baseline to track trends, evaluate impacts, set goals – Safety Assurance
- The goal of MBTA's work to develop and implement OSHA-based safety programs is to have a positive impact on *employee safety, employee injury trends and rates, and employee morale*:
 - Identifying hazards and risks through hazard assessments and reporting – Safety Risk Management (SRM)
 - Creation/enhancement of safety procedures to mitigate hazards – SRM
 - Creation of auditing processes on programs once implemented – Safety Assurance
 - Safety awareness and task-specific training – Safety Promotion

Embedding SMS into the OHS programs not only assures future continuous improvements in worker safety but will allow us to make data-driven decisions on allocation of resources to mitigate risks.

