



AMERICAN PUBLIC GAS ASSOCIATION

MEMORANDUM

DATE: March 31, 2021

TO: APGA Public Gas System Managers

FROM: Carl Smith, APGA Operations & Safety Committee Chairman

RE: Safety Contest for the 2020 Calendar Year

I invite each of you to participate in the annual APGA Safety Contest. The Safety Contest Rules and Entry Form are enclosed for your completion by May 7, 2021. You can also complete the survey online at: <https://www.surveymonkey.com/r/2021safetycontest>.

If you have any contest questions, please contact Simon Cook of APGA staff by phone at 202-930-6720 or by email at scook@apga.org.

Have a safe day



APGA SAFETY CONTEST RULES

GROUPING OF CONTESTANTS:

All APGA public gas system members are eligible to enter this contest. Contestants shall be divided into the following groups based on the annual number of man-hours worked:

- Group A = 8,000 or less man-hours
- Group B = 8,001 to 18,000 man-hours
- Group C = 18,001 to 38,000 man-hours
- Group D = 38,001 to 70,000 man-hours
- Group E = 70,001 or more man-hours

The winner of each group shall be the contestant having the lowest overall incidence rate for the contest period. This rate is determined by adding all recordable injuries and computing the incidence rate using the following formula:

$$\text{Incidence Rate} = \text{Total Recordable Injuries} \times 200,000 \div \text{Man-Hours}$$

If two or more contestants have equal incidence rates, they will each be presented with an award.

REPORTING MAN-HOURS:

Option 1: For the purpose of this contest, each contestant must include the actual man-hours covering employees and supervisors on all shifts including operating, maintenance, clerical, office and all other departments of the *gas utility only* for the period of January 1 to December 31, 2020.

Option 2: If the actual hours are not known, you may calculate total man-hours. The estimated number of man-hours is obtained by multiplying the average number of employees by the average number of hours worked per week by the number of pay weeks per year. For example: If the average number of employees is 20 and the average number of hours worked is 40 per week for 52 weeks, the total man-hours for the year would be: $20 \times 40 \times 52 = 41,600$. Please note: A 40 hour work week equals 2080 pay hours per year.

REPORTABLE INJURIES:

A reportable injury shall be any injury arising out of and during the course of employment which results in death, days away from work, restricted work activity or transfer to another job, or medical treatment beyond first aid, or loss of consciousness. Types of injuries or accidents used in reporting are limited to the following:

- a. **Fatality:** Fatality includes any death resulting from an occupational injury regardless of the length of time which elapses between the injury date and death.
- b. **Injuries or Illness:** The number of injury or illness cases resulting in employee being placed on restricted work activity or transfer to another job, receiving medical treatment beyond first aid, or loss of consciousness.

REPORTING GUIDANCE:

The APGA Safety Contest utilizes the same reporting requirements as Occupational Safety & Health Administration (OSHA) in the [OSHA 300 Log](#). The following extractions from OSHA reporting regulation [§1904.7](#) are also applicable to the APGA Safety Contest:

Medical treatment beyond first aid:

How do I record an injury or illness that involves medical treatment beyond first aid? If a work-related injury or illness results in medical treatment beyond first aid, you must record it on the OSHA 300 Log. If the injury or illness did not involve death, one or more days away from work, one or more days of restricted work, or one or more days of job transfer, you enter a check mark in the box for cases where the employee received medical treatment but remained at work and was not transferred or restricted.

- (i) ***What is the definition of medical treatment?*** "Medical treatment" means the management and care of a patient to combat disease or disorder. For the purposes of Part 1904, medical treatment does not include:
- (A) Visits to a physician or other licensed health care professional solely for observation or counseling;
 - (B) The conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (*e.g.*, eye drops to dilate pupils); or
 - (C) "First aid" as defined in paragraph (b)(5)(ii) of this section.
- (ii) ***What is "first aid"?*** For the purposes of Part 1904, "first aid" means the following:
- (A) Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);
 - (B) Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment);
 - (C) Cleaning, flushing or soaking wounds on the surface of the skin;
 - (D) Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, etc., are considered medical treatment);
 - (E) Using hot or cold therapy;
 - (F) Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);
 - (G) Using temporary immobilization devices while transporting an accident victim (*e.g.*, splints, slings, neck collars, back boards, etc.);
 - (H) Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
 - (I) Using eye patches;
 - (J) Removing foreign bodies from the eye using only irrigation or a cotton swab;
 - (K) Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
 - (L) Using finger guards;
 - (M) Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or
 - (N) Drinking fluids for relief of heat stress.
- (iii) ***Are any other procedures included in first aid?*** No, this is a complete list of all treatments considered first aid for Part 1904 purposes.

- (iv) ***Does the professional status of the person providing the treatment have any effect on what is considered first aid or medical treatment?*** No, OSHA considers the treatments listed in § 1904.7(b)(5)(ii) of this Part to be first aid regardless of the professional status of the person providing the treatment. Even when these treatments are provided by a physician or other licensed health care professional, they are considered first aid for the purposes of Part 1904. Similarly, OSHA considers treatment beyond first aid to be medical treatment even when it is provided by someone other than a physician or other licensed health care professional.
- (v) ***What if a physician or other licensed health care professional recommends medical treatment but the employee does not follow the recommendation?*** If a physician or other licensed health care professional recommends medical treatment, you should encourage the injured or ill employee to follow that recommendation. However, you must record the case even if the injured or ill employee does not follow the physician or other licensed health care professional's recommendation.

Loss of consciousness:

Is every work-related injury or illness case involving a loss of consciousness recordable? Yes, you must record a work-related injury or illness if the worker becomes unconscious, regardless of the length of time the employee remains unconscious.

Restricted work or job transfer:

How do I record a work-related injury or illness that results in restricted work or job transfer? When an injury or illness involves restricted work or job transfer but does not involve death or days away from work, you must record the injury or illness on the OSHA 300 Log by placing a check mark in the space for job transfer or restriction and an entry of the number of restricted or transferred days in the restricted workdays column.

- (i) ***How do I decide if the injury or illness resulted in restricted work?*** Restricted work occurs when, as the result of a work-related injury or illness:
 - (A) You keep the employee from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work; or
 - (B) A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work.
- (ii) ***What is meant by "routine functions"?*** For recordkeeping purposes, an employee's routine functions are those work activities the employee regularly performs at least once per week.
- (iii) ***Do I have to record restricted work or job transfer if it applies only to the day on which the injury occurred or the illness began?*** No, you do not have to record restricted work or job transfers if you, or the physician or other licensed health care professional, impose the restriction or transfer only for the day on which the injury occurred or the illness began.
- (iv) ***If you or a physician or other licensed health care professional recommends a work restriction, is the injury or illness automatically recordable as a "restricted work" case?*** No, a recommended work restriction is recordable only if it affects one or more of the employee's routine job functions. To determine whether this is the case, you must evaluate the restriction in light of the routine functions of the injured or ill employee's job. If the restriction from you or the physician or other licensed health care professional keeps the employee from performing one or more of his or her routine job functions, or from working the full workday the injured or ill employee would otherwise have worked, the employee's work has been restricted and you must record the case.
- (v) ***How do I record a case where the worker works only for a partial work shift because of a work-related injury or illness?*** A partial day of work is recorded as a day of job transfer or restriction for recordkeeping purposes, except for the day on which the injury occurred or the illness began.
- (vi) ***If the injured or ill worker produces fewer goods or services than he or she would have produced prior to the injury or illness but otherwise performs all of the routine functions of his or her work, is the case considered a restricted work case?*** No, the case is considered restricted work only if the worker does not perform all of the routine functions of his or her job or does not work the full shift that he or she would otherwise have worked.

- (vii) **How do I handle vague restrictions from a physician or other licensed health care professional, such as that the employee engage only in "light duty" or "take it easy for a week"?** If you are not clear about the physician or other licensed health care professional's recommendation, you may ask that person whether the employee can do all of his or her routine job functions and work all of his or her normally assigned work shift. If the answer to both of these questions is "Yes," then the case does not involve a work restriction and does not have to be recorded as such. If the answer to one or both of these questions is "No," the case involves restricted work and must be recorded as a restricted work case. If you are unable to obtain this additional information from the physician or other licensed health care professional who recommended the restriction, record the injury or illness as a case involving restricted work.
- (viii) **What do I do if a physician or other licensed health care professional recommends a job restriction meeting OSHA's definition, but the employee does all of his or her routine job functions anyway?** You must record the injury or illness on the OSHA 300 Log as a restricted work case. If a physician or other licensed health care professional recommends a job restriction, you should ensure that the employee complies with that restriction. If you receive recommendations from two or more physicians or other licensed health care professionals, you may make a decision as to which recommendation is the most authoritative, and record the case based upon that recommendation.
- (ix) **How do I decide if an injury or illness involved a transfer to another job?** If you assign an injured or ill employee to a job other than his or her regular job for part of the day, the case involves transfer to another job. Note: This does not include the day on which the injury or illness occurred.
- (x) **Are transfers to another job recorded in the same way as restricted work cases?** Yes, both job transfer and restricted work cases are recorded in the same box on the OSHA 300 Log. For example, if you assign, or a physician or other licensed health care professional recommends that you assign, an injured or ill worker to his or her routine job duties for part of the day and to another job for the rest of the day, the injury or illness involves a job transfer. You must record an injury or illness that involves a job transfer by placing a check in the box for job transfer.
- (xi) **How do I count days of job transfer or restriction?** You count days of job transfer or restriction in the same way you count days away from work, using § 1904.7(b)(3)(i) to (viii), above. The only difference is that, if you permanently assign the injured or ill employee to a job that has been modified or permanently changed in a manner that eliminates the routine functions the employee was restricted from performing, you may stop the day count when the modification or change is made permanent. You must count at least one day of restricted work or job transfer for such cases.

APGA Safety Contest Entry Form

January 1, 2020 – December 31, 2020

System: _____

Address: _____

Phone: () _____ **Email Address:** _____

Prepared by: _____

A. Man-hours worked or paid (natural gas employees only)

Please **choose one** of the following:

Option 1 (from records)

Total man-hours paid (from payroll records): _____ (hours)

Option 2 (calculated)

Number of employees:	Operations	_____
	Clerical	_____
	Management	_____
	Other	_____
	Total Employees*	_____

Calculated man-hours:

Total employees* _____ x 2080 pay hours/year = _____ (hours)

B. Accidents and Injuries

1. Number of fatalities _____

2. Number of injury or illness cases that involve medical treatment beyond first aid or loss of consciousness _____

3. Number of injury or illness cases that resulted in days away from work, restricted work or transfer to another job _____

Please return no later than May 7, 2021 to:

American Public Gas Association • 201 Massachusetts Avenue, NE, Suite C-4 • Washington, DC 20002

Fax: 202-464-0246 • Phone: 202-464-2742 • e-mail: scook@apga.org