

Why Every Printer Should Have a Mock OSHA Audit

An OSHA audit is a stressful, high-stakes experience. After all, if the auditor finds a problem, you can be on the hook for some pretty hefty fines. What’s even worse than an OSHA audit? Having an employee get injured – and then realizing that the injury could have been prevented if your safety program had been more robust.

A great way to avoid both safety regulation violations and injuries is to bring in an expert to conduct a mock OSHA audit. You may be surprised at what they find.

What is a mock OSHA audit?

“In a mock OSHA audit,” says John Holland, President and Certified OSHA Trainer from Assured Compliance Solutions, Inc., “a third party auditor comes to your facility and audits everything that an OSHA inspector would inspect. It’s an ideal way to find out where you are in or out of compliance with safety laws and what you need to do to make your operations safer.”

What does a thorough mock OSHA audit include?

When John conducts an audit, he will:

- **Review your OSHA record-keeping,** including your chemical list, safety data sheets (SDSs), Form 300s and Form 300As. Have you been keeping all of these properly? Are the 300s and 300As accurately dated? If the audit is taking place during the months in which the prior year’s 300 and 300A forms should be posted, are they posted correctly?
- **Review your written safety program,** including the safety program itself, minutes from your safety committee meetings and any disciplinary action taken against employees who have violated your safety rules.
- **Review your training program,** including your training manuals, tests and records. Is the material sufficiently thorough to meet OSHA requirements?
- **Look at every press and piece of machinery.** If the machine is operating, John may watch to see

how it is being run. “From my 30 years of experience focusing exclusively on safety for printing operations,” John shares, “I know which machines have been known to cause injuries for print manufacturing operators. If one of these machines is operating, I’ll take extra time to watch to see if it is being operated safely.” John always takes an especially close look at electrical issues and machine guarding, as these are big keys to avoiding injuries in printing plants.

Guarding can be particularly problematic on older equipment. Working with an experienced auditor who specializes in our industry can make a big difference here. “It’s one thing to understand machine guarding in general,” John points out “It’s another to understand the older machines - the Cylinder Heidelbergs, Windmills, Kluges, Winkler+Dunnebers and DIDDEs – and know how other

Continued on back



BUSINESS MANAGEMENT

The Pros and Cons of Every Door Direct Mail

Every Door Direct Mail (EDDM) (see <https://bit.ly/USPSEveryDoor>) is an offering from the U.S. Postal Service that enables the mailer to identify neighborhoods and target every active address in that area for a discounted postage rate. EDDM can be a highly effective way to blanket an entire mail carrier route, and it offers an appealing cost. Even so, it does have some drawbacks that limit its ability to track and personalize direct mail messaging.

Which businesses are best suited to EDDM?

EDDM works best for businesses like auto repair shops, dentists, dry cleaners, gyms, hair salons, movers, restaurants, retail shops and spas, or non-profits like charities and places of worship. Anyone could possibly need these services, but some businesses will have more specific requirements. For example, what good does it do for a lawn service to put its message in front of apartment dwellers? Even someone who owns an auto repair service or hair salon would ideally want to understand household income level or other factors (e.g., home ownership or whether there are children at an address). For some services, like

childcare, targeted mail is particularly important because not everyone will have young children who might require care. So even if you’re blanketing an area and saving money on postage, this will do little good if you aren’t getting your message to the right people.

Functional limits of EDDM

An EDDM mailing must contain at least 200 pieces and cover one complete carrier route, and it cannot exceed 5,000 pieces per day. Fortunately, though, no special mailing permit is needed. At the same time, however, there are limits on the ability to personalize your messaging. You can use tools like QR codes, but the ability to personalize the messaging is lost because personal addresses are not used for EDDM mailings. This also makes it difficult to track results back to an individual.

If your mail campaign is for a business like a restaurant that is hoping to attract local customers in a specific neighborhood, EDDM can be an inexpensive and effective way to reach prospects. If you need to target recipients based on factors other than their addresses, you will probably want to pursue more targeted methods.

Targeted methods with personalization and tracking

Personalization and tracking are important to marketers. Other types of bulk mailing enable users to track delivery so that they can be assured that

the mail piece has arrived, but the U.S. Postal Service does not offer tracking on EDDM. That is a major trade-off for the inexpensive postage.

In a sense, it comes down to the bang for the buck of each marketing dollar. Maximizing return on investment often means eliminating the waste of sending mail to recipients who have no interest in or ability to purchase a given product or service. Many printing firms take tracking a step further by helping companies track the leads that are generated.

A mailing list of targeted prospects combined with a personalized message using tools like QR codes and personalized URLs are invaluable in connecting offline to online. If you also add in lead tracking, all these factors can combine to make an extremely effective direct mail piece.

The bottom line

In summary, the pros and cons of EDDM are fairly straightforward.

| |
|---|
| Pros |
| Inexpensive full area coverage |
| Well-suited to some types of businesses |
| No requirement for a special mailing permit |
| Cons |
| No ability to track |
| No ability to personalize to the recipient |
| No ability to target to specific customer types |

Overall, print service providers should:

- Use direct mail to leverage the values of print that marketers deem important: a physical copy of

information, an offline channel for forging online connections, and a memorable customer experience through a tactile and interactive medium.

- Use EDDM when blanket coverage and low cost is a good fit for your customer.
- Upsell to more targeted methods to address customer concerns about tracking print by featuring tools like QR codes, mail tracking services and lead follow-up capabilities.

Source: Jim Hamilton, Consultant Emeritus at Keypoint Intelligence



GOVERNMENT AND LEGISLATIVE

On Our Radar

Proposed regulations and other issues that we’re following:

- **Criminal Background Checks** – SB 809 would ban criminal background checks by most private sector employers, with some exceptions.
- **Indoor Heat Illness Prevention Standard** – Cal/OSHA has finally published its proposed indoor heat illness prevention standard. This standard would apply to all indoor work areas where the temperature is at least 82 degrees Fahrenheit when employees are present, with enhanced requirements if it is 87 degrees or higher. You can download the proposed regulation at bit.ly/IndoorHeat2023.

Approved regulations and other issues that we’ve been following:

- **Arbitration agreements** – The Ninth Circuit Court of Appeals has struck down AB 51, which had imposed both civil and criminal penalties on employers that required employees to sign arbitration agreements.
- **Government agency data sharing** – The National Labor Relations Board (NLRB) and the Consumer Financial Protection Bureau (CFPB) have created a formal partnership whereby they’ll be sharing non-public data with each other to protect workers from employer surveillance and monitoring, data collection and employer-driven debt related to the purchase of equipment, supplies or required training.

- **PUMP Act Guidance issued** – The U.S. Department of Labor (DOL) has issued guidance regarding the Providing Urgent Maternal Protections for Nursing Mothers Act (PUMP Act), which they began enforcing on April 28. You can find the FAQs at <https://bit.ly/PumpAct> and the Fact Sheet at <https://bit.ly/PUMPfacts>. Note that in any areas in which California or local law is more favorable to the employee, the state law will apply.



UPCOMING EVENTS

Par-Tee On the Green



Date: Tuesday June 20, 2023
Location: Arrowhead Golf Course
**10850 W. Sundown Trail
Littleton, CO 80125**
12 pm - Registration, Warm-up and Lunch
1:30 pm - Shotgun Start
\$179 per member, \$209 per non-member
Includes: grab-and-go lunch and dinner celebration
Register today at <https://conta.cc/3KwRnta>
For information, contact Cathy Skoglund at 323-728-9500 Ext 221 or cathy@piasc.org

HR Question Roundup

How do we know when an employee is ready for a leadership role?

Promotions into leadership too often come with little discussion about how the leadership role will be different from the current role or whether the employee has the interest or skill set to

be an effective leader. Fortunately, there are indicators that someone is likely ready for a leadership role. These include (among other traits) their ability to communicate effectively, inspire and motivate others, resolve conflicts while minimizing drama, adapt to change and take accountability



for the work of their team. If there's an employee you'd like to promote, but they haven't expressed an interest in a leadership role, schedule a meeting with them to talk about the idea. Share why you feel they are ready for the role and what it means to be a leader within your organization. Ask about their career goals and how they would like to advance within the organization. Let the employee know how you can support them with these goals, whether or not they move into a leadership track. If the employee is interested in leadership, provide them with a clear picture of the responsibilities and the training and guidance they'll receive as they move into the new role. Most employees who are new to leadership will need extra support as they transition into a position of greater responsibility.

Can we discipline an employee for not taking a lunch break?

Yes, generally you can and should require an employee to take a lunch break, whether they are working on site or remotely. In many states, including California, employers are required to provide employees with rest breaks, meal breaks or both, and are sometimes even required to provide them at spe-

cific times during an employee's shift. An employee skipping these rest periods could result in noncompliance with those laws. Additionally, an employee who works through their breaks may see negative impacts on their health and well-being, while you may see a drop in their overall productivity. It's in everyone's best interest that the appropriate break time is provided and taken. Having said that, before taking any adverse action against the employee, try to find out why they're working through their break. Perhaps they would rather take their break at a different time (if that is legally permissible in your area), or maybe their workload is so heavy they feel they have to work through breaks to keep up. We advise approaching the employee with curiosity and looking for a solution that works for both of you. If the employee continues to skip their breaks despite these efforts, you can consider whether discipline is appropriate.

Source: HR|BIZZ

CONTACT US

Address

5800 S. Eastern Avenue,
Suite 400
Los Angeles, CA 90040
P.O. Box 910936
Los Angeles, CA 90091
Phone: 323.728.9500
www.piasc.org

Key Contacts

LOU CARON,
PRESIDENT
Ext. 274, lou@piasc.org

DENNIS BERNSTEIN,
COMMERCIAL INSURANCE
Ext. 222, dennis@piascins.com

EVIE BAÑAGA,
EMPLOYEE BENEFITS
Ext. 224, evie@pibt.org

KRISTY VILLANUEVA,
MEMBER SERVICES
Ext. 215, kristy@piasc.org

RODNEY BOLTON,
HUMAN RESOURCES
Ext. 218, piasc@hrbizz.com

FEATURE, CONTINUED

Continued from Front

printers have successfully made up for the lack of original machine guarding so that these presses are now safe and in compliance with current OSHA standards.”

- **Look at chemicals and use of PPE.** Are all chemicals being handled, labeled and stored correctly? Are employees wearing the required personal protective equipment (PPE) as called for by the safety data sheets? Does the plant manager realize that you can't simply have a cupboard full of PPE and tell employees to wear whatever they think they need? “Since 1994,” John points out, “OSHA regulations have stated that you must create a written evaluation of all the chemicals (and other hazards) that the person in each job function may use or come in contact with and the PPE that must be worn to mitigate these exposures, and then require the employees to wear that PPE. Surprisingly, the owners and/or managers at many of the printing businesses I visit tell me they had no idea this was the law.”
- **Walk every department of the facility** and inspect for compliance issues with a long list of things, including fire extinguishers, eye

wash stations, pallet/lighting/ladder issues, first aid kit issues, and much more.

While it is theoretically possible to conduct an audit virtually via video call, for the most reliable results you'll want the auditor to be physically at your facility. If your plant manager is walking around with his or her phone filming things, everyone is likely to be on their best behavior. An auditor can be more inconspicuous. “For example,” John reports, “Sometimes I'll stand between racks where no one can see me, and watch forklift operators from afar. This is a great way to observe how they behave when they don't know they're being watched.”

What are the benefits of in-person mock OSHA audits?

A mock audit is a great tool for improving the safety of your workplace, preventing accidents and injuries and getting in compliance with OSHA (or your state's OSHA) regulations. The biggest benefit, according to John, is that you'll likely uncover potential serious accidents waiting to happen, that can now be avoided through proper training and mitigation practices.

Once the audit is complete you'll be able to use the findings to...

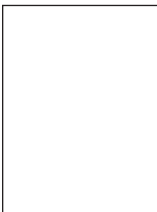
- Fix the things that have been

identified as safety hazards and/or compliance issues

- Address any record-keeping issues
- Make any needed changes to your safety and training programs

The bottom line is, if you have never had a mock OSHA audit done by an expert in our industry, you really ought to do so. The results can be eye-opening.

As a PIA Preferred Partner, John offers discounts to PIA members. You can reach him at 800-280-5415 ext. 304 or john@complianceanswers.com.



5800 S. Eastern Ave., #400
Los Angeles, CA 90040



Events CALENDAR

12th Colorado Par-Tee on the Green
TUESDAY, JUNE 20

Arrowhead Golf Course
Littleton, CO
https://conta.cc/3kwRnta

Save the Date:
Annual Surplus Drive
THURSDAY-FRIDAY, SEPTEMBER 14-15

Save the Date:
Paper and Substrate Show
TUESDAY, OCTOBER 3

05 MAY

| SU | MO | TU | WE | TH | FR | SA |
|----|----|----|----|----|----|----|
| | 1 | 2 | 3 | 4 | 5 | 6 |
| 7 | 8 | 9 | 10 | 11 | 12 | 13 |
| 14 | 15 | 16 | 19 | 20 | 21 | 22 |
| 23 | 24 | 25 | 17 | 18 | 26 | 27 |
| 28 | 29 | 30 | 31 | | | |

FOR FULL LIST OF EVENTS,
PLEASE VISIT
WWW.PIASC.ORG/EVENTS