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Route Sales, Service, and Delivery: Safety "No-Man's Land"

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Introduction

I've faced many challenges during my 25+ years of safety experience. There have been new Hazwoper regulations, ergonomics initiatives, DOT hours, OSHA inspections, labor disputes, NRC Licensing, in-house EPA inspectors, fires, explosions, emergency response evaluations, etc., etc., etc. Every step of the way, I was able to find ample resources, expertise and experience to help me succeed. There were regulations, interpretations of regulations, seminars, training programs, and (of course) consultants on every street corner eager to provide any and all needed assistance. There was even an overflowing toolbox of information to help us gain the commitment and support from upper management that we (safety professionals) must have as a core organizational value to be successful. That all changed for me in June, 1998, when I unexpectedly entered a safety "no-man's land". It's a world where there was little regulation, yet huge challenges. There were few available resources, yet endless opportunities. It was outside the day-to-day interests of OSHA, and wasn't a part of the comprehensive DOT control system, either. We call it DSD, or Direct Store Delivery, and it's a safety "no-man's land". This paper will describe some of my experiences, successes (and failures) and provide a framework of components that can be part of a successful loss control program for route sales, service and delivery. So fasten your seatbelts.. here we go:

The DSD World

Direct Delivery and Service Exposures

Working in the direct delivery and service (let's just call it "DSD") environment presents all traditionally recognized exposures such as slips, trips, & falls, lifting, sprains & strains, and all typical vehicle issues. These are all situations that can be managed using the normal training, coaching, and leadership methods, right? Well, before you make any assumptions, consider these additional factors:

1. In most cases, employees work unsupervised.
2. Turnover is usually very high, so a large percentage of new employees are always present.
3. Work environments change from minute to minute, everything from rain to rats.

4. The multi-tasking nature of work challenges the disciplines of even the best employee.
5. Ask the employee to do 16 hours of work in 10.

Add it all up, and you have numerous exposures in difficult environments, an employee in a hurry, and it all spells trouble. And for the most part, OSHA can't help. Their focus is on fixed facilities, manufacturing, warehousing, etc. If there are any doubts, read what they said in the Federal Register:

> "When a worker is killed or injured in a motor vehicle accident on a public highway or street, OSHA is only likely to investigate the incident if it occurred in a highway construction zone. Likewise, when a worker is killed or injured in an airplane crash, a train wreck, or a subway accident, OSHA does not investigate, and there is thus no need for the employer to report the incident to OSHA."[1]

This isn't to say that OSHA doesn't care, but rather that their regulations, inspection programs, training support, etc. just don't apply to the exposures during day-to-day DSD activities.

DSD Employees

In today's available workforce market, the average DSD applicant is not your "shining star". I say this not to degrade the average applicant, but merely to point out the fact that pay vs. the required work for the typical DSD job does not bring forth the most desirable candidates. In most cases, the fortunate exceptions are only seen by the employers of choice, such as UPS and FedEx. For us, we get the rest. And as for current employees, you most likely have a small core of long-term employees, many of whom are aging and physically wearing down. Retention is an ongoing challenge, too. Turnover rates are common in the range of 40 to 60% per year. So that leads to the continuing training of new employees, and common incidents associated with their lack of experience. And most of the remaining group of good employees are likely only awaiting their promotion to manager. In other words, DSD employees are all over the map, in a manner of speaking.

One very interesting phenomenon is also worth discussing. DSD companies often find many employees employ the art of being a "benefits" employee. I call them "benefits" employees because they like the availability of health insurance and other benefits, while working a job that gives seemingly limitless independence and flexibility. These are average-to-low performing employees who find that a DSD job allows them to get personal tasks done conveniently within the daily routines of DSD work. Some even describe it as a "part time job for benefits", while they do things like run used car lots, run other side businesses, or simply play golf. Let's not kid ourselves, though. It's not hard to figure out that many of us are enablers. Effective, engaged DSD managers don't let this happen. The "benefits" employees can only exist when there is a lack of discipline and control. Most of these are short term, though, as their lack of performance eventually catches up with them even with an average manager. Shamefully, though, some last longer than they should.

Incident Histories

When evaluating incident histories with DSD organizations, there are many distinct trends. DSD organizations have mostly slips and falls that lead to sprains, strains, contusions, etc. Vehicle incidents are typically related to the oversized nature of the vehicle, or the distracted employee/driver. Most employees know how to handle materials, they know how to drive (although not necessarily the larger vehicle), and they know how to move around safely. History tells us, though, that a high percentage of employees do not know how to do all of those things together within the span of a normal work day.

You can expect a vehicle incident rate of about 1 to 2 incidents for every 10 employees per year, and an OSHA LTA rate (including restricted cases) of about 5.0 to 7.5. With these numbers, we find a lot of opportunity for loss control program success. Through all of these discussions, though, let's remember a key ingredient. Like any other programs, there must be consistent, broad based leadership support for them to achieve the desired results.

Loss Control Programs

Only a few of the classic loss control programs used in plant environments have any relevancy to DSD. Programs like lockout/tagout, confined space, powered trucks, etc. have prevented few incidents in the DSD world. Prevention is most effective using a combination of training, coaching, and leadership, with a primary focus on basic work behaviors. Years of experience have given us an understanding of how to put all of these pieces together. The basic components for an effective DSD loss control program are:

1. Applicant Selection Tools
2. Post Offer Screenings
3. New Employee Training
4. Supervisor Training
5. Policies and Procedures
6. Fleet Monitoring Program
7. Incident and Injury Response Plans
8. Corrective Action Programs
9. Data and Trend Analysis Systems
10. Communications – Awareness and Recognition
11. Comprehensive Fleet Operations System

Applicant Selection Tools

There are several actions that can be taken early in the selection process that can significantly reduce losses once a new employee is put on the job. However, caution is always the word of the day when it comes to any potential perception that recruiters may profile, discriminate, or pre-judge in any way. Those practices are unacceptable, both from a legal prospective and from an ethical one. The proper focus in a selection process

that avoids these pitfalls is the direct correlation of job requirements to the physical, mental, and emotional (interpersonal) skills required for the job. To make this happen, you must have a detailed job description that includes physical requirements, as well basic math and communication skills defined. By outlining these requirements, and questioning the applicants' abilities to meet these requirements, many issues can be identified and many losses prevented.

The interviewing process is used as the initial screening activity. This is where you discuss previous work experience, job skills, and general knowledge and aptitudes applicable to the job. In addition to these standard requirements, safety philosophies can be determined with simple (job related) discussions such as:

1. "Tell me about the safety rules you were required to follow at your previous jobs."
2. "Why do you think safety rules were necessary?"
3. "What are some of the safety rules that interfered with your productivity or efficiency, and how did you deal with those?"

Those are just a few of the many discussions that will help assess an applicant's safety priorities. Between the identification of a skill and/or physical ability shortfall, and recognition of inadequate safety priorities, you can eliminate many potential high-risk applicants.

The biggest obstacle to overcome, however, is created by the common practice of the "recruiter" being the same person (i.e. manager) that needs a position rapidly filled because of an organizational void. This results in conflicting priorities that push a recruiter to fill a position with a less-than-qualified candidate. Frequently called the "fog the mirror", or "it's alive and breathing" criteria, standards are ignored in order to just get someone on the route. Managers may be motivated to do this because they themselves might be running the vacant route, their numbers are suffering, their other work is piling up, and everything in life will be easier when the someone is hired. Unfortunately, the obvious outcome is a self-perpetuating cycle of declining efficiencies, poor service and reliability, and ultimate failure. Recruiters that are also managers must be given the tools and opportunity to avoid this trap.

Post-Offer Screenings

Once your candidates have been screened and an offer made, there are now several processes that must be completed prior to your new employee starting to work. These include a motor vehicle record check, a criminal background check, substance (drug and alcohol) test, and a physical screening. Most of these are your normal functions, except for the physical screening. This is a relatively new practice for DSD where a third party medical/PT group evaluates your physical job requirements by actually working with one of your current employees. Based on this evaluation, a physical test protocol is developed that can be used to determine the ability of your applicant to perform the basic physical duties of the job. Based on current statistics, this combination of screening will eliminate between 5 and 15 percent of applicants that have been selected for employment. Of all of the testing, the most directly relevant to injury losses is the physical screening. The cost is about $125 per test, but it's easy to justify if you eliminate a $250,000 back claim for every $100,000 less you spend on screening.

New Employee Training

Most new employees do not have relevant experience that enables them to work a DSD job without an increased risk of an accident or injury. The three categories of need are somewhat obvious. First, typical defensive driving skills must be re-established, but with a vehicle that is much larger than most drivers are familiar with. Secondly, there are the basic lifting skills, back safety, etc. Thirdly, and the source of the highest number of injuries, are the skills associated with working in and out of a DSD vehicle dozens of times a day. These are skills such as using three point contacts, maintaining clear vision when walking, properly parking in the best locations, good vehicle housekeeping, wearing good footwear, proper hand-truck use, and on and on..

The most effective training given to the new employee is practical, hands-on, skills based training. Classroom information needs to be supported by observed skills practice where immediate instructor feedback is given to ensure proper skills are learned. An effective program has a driving section that includes actual operation of their new, extra large vehicles. Striking fixed objects is a common DSD vehicle incident, so extra emphasis is needed on the vehicle dimension and turning characteristics. Another part of driver training is proper parking, primarily to avoid backing, which is another leading cause of accidents. Training must also include how to load and unload the vehicle, and the proper way to move product and materials. Even something as routine as entering and exiting the vehicle needs to be demonstrated and stressed to the highest levels as an expectation for the job.

And by the way, a frequent training suggestion is to incorporate expansive computer based training to ensure detailed and consistent training throughout your DSD geography. It is true that the programs are all there for the taking. Just buy them, tweak them to our needs, and put them out on our sites for everyone to use and our problems are solved. Let's not kid ourselves. We sit comfortably in our offices, staying up to date with the latest safety technologies, communicating at will, and believing all of the "computers in every home" hype. The facts appear to contrary to those assumptions. Not only have we found that many DSD route employees have little to no computer skills, but unfortunately a surprising number of first line managers also have limits.

Supervisor Training

The critical component of an effective DSD safety effort, though often not addressed, is the skill of the first line supervisor. There are qualities required of the DSD supervisor that go far beyond those of a conventional plant line manager. The DSD supervisor must be able to communicate safety expectations, effect necessary changes in behavior, monitor progress, correct deficiencies, and do it all for 10 different employees in 10 different parts of the state. Nothing to it, eh?

Supervisors must be presented with basic management skills, interpersonal communications, and other leadership practices that will make them as effective as possible. For DSD, these skills are even more difficult to use successfully, so training must include extensive role-playing/skills practice exercises. Frequent observation and support by the next level of management is essential as well.

Policies and Procedures

Just as in a plant environment, policies must be in place to ensure rules, policies, and expectations are clear. These documents are also used to support employee corrective actions when needed. For DSD, the policies must address safety issues from "cradle to grave" for your employees. The policies we have developed include:

1. Cell Phones (proper use of phones while driving)
2. Crime Prevention and Response (individual crime prevention precautions)
3. Criminal Background Investigation (yes/no criteria used by third party contractor)
4. Drug and Alcohol (general corporate policy)
5. Drug and Alcohol testing Procedure (pre-employment, post-incident test criteria)
6. Motor Vehicle Driver Qualification (yes/no criteria used by third party contractor)
7. Motor Vehicle Safety (safe operating requirements)
8. On-the-Job Injuries, Accidents, and Property Damage Reporting (reporting and response protocols)
9. Return to Work from On-the-Job Injury (procedures, light duty, etc.)
10. General Safety Rules and Safe Work Practices (summary of safety rules)

All of these documents are detained and cover every conceivable scenario. For the DSD employee, though, the "General Safety Rules" document is the day-to-day safety handbook. The General Rules include every basic rule and requirement, and is in a simple form to aid in understanding and compliance.

Fleet Monitoring Program

An effective tool that provides an extra set of eyes for your management team is a 1-800-how's my driving program. We are currently using one of the industry leaders, based in Lighthouse Point, FL. Using a fleet monitoring system can help identify specific driver behavior trends before incidents occur. And although there may be an inherent lack or reliability with many calls received, the coaching opportunities are invaluable. It also helps for the employee to realize that his/her vehicle is under constant observation by an endless number of irritable people.

Incident and Injury Response Plans

Response plans, of course, are all covered in training programs and included in policies and procedures. Every employee has an accident/injury notification wallet card with basic response information. Vehicles are also provided with packages that include response instructions, forms, prepared chain-of-custodies, and sometimes even disposable cameras. As we all know, loss totals can be significantly reduced by rapid response when necessary. The important piece of this is that the employee understands and complies with immediate reporting requirements.

Corrective Action Programs

The easy part of a corrective action program is to provide counseling or discipline for an employee that is injured or involved in a preventable accident. We also frequently require additional training, although there is a general consensus that this type of training is only viewed as punitive and likely ineffective. The bigger challenge is getting your managers to correct the unsafe behaviors, using a program that is not tied to incidents, but specifically tied to behaviors and policy violations. This is extremely difficult to

accomplish, and requires structured reviews, observations and coaching. Identifying near misses can help provide behavior change opportunities, and we actually use a documented counseling process, that even includes more frequent MVR checks for the offending employee.

Data and Trend Analysis Systems

What safety system would be complete without tracking mechanisms that identify who, when, where, how often, and (maybe) why things occur. We track accident and injuries, incident rates, locations, and all the normal stuff. It's necessary because, despite the fact that we know what the issues are, locations management teams have a need to see everything in a spread sheet. That's okay though, because the message inevitably is the same. In order to help managers actually see what they should be focusing their efforts on, we even track types of events, locations, etc. A simple example for injuries is shown below. Although it's not nearly as technical as a safety or insurance professional usually uses, it's easy for a sales manager to understand and they love it.

	Sales Total		
Injury	**Period**	**YTD**	**YTD %**
Sprain/Strain	12	18	64.3%
Fracture	2	2	7.1%
Contusion	2	3	10.7%
Cut/Laceration	0	0	0.0%
Other	1	5	17.9%
(total)	17	28	
Location			
Truck (in & around)	11	14	50.0%
Stockroom (in & around)	1	4	14.3%
Account (in & around)	3	6	21.4%
Vendor	0	0	0.0%
MVA	2	4	14.3%
Other	0	0	0.0%
(total)	17	28	
Activity			
Entering/Exiting vehicle	7	9	32.1%
Lifting	2	7	25.0%
Driving	2	4	14.3%
Moving vendor	0	0	0.0%
Walking	3	4	14.3%
Other	3	4	14.3%
(total)	17	28	
Part of Body			
Neck/Back	7	10	35.7%
Foot/Ankle	4	4	14.3%
Leg/Knee	2	3	10.7%
Wrist/Hand	0	1	3.6%
Other	4	10	35.7%
(total)	17	28	

We use the same basic process for vehicles, tracking things like backing incidents, striking fixed objects, and intersection related accidents. All of this information helps support the messages we try to deliver in our safety training and coaching.

Another program we use involves assigning average incident costs to specific cost centers where the incidents are occurring. If you want to get a location manager's attention, send him or her a notice that their cost center has been charged $8,000 plus $850 per missed work day for their employee that slipped and fell off the truck, and has been written out of work.

Communications – Awareness and Recognition

Lastly, we should mention one of the old-school approaches that still has value. Despite all the modern day communications systems, it still helps to maintain a basic safety awareness using various available media. Useful tools include the employee handheld computers, manager emails, monthly or quarterly newsletters, and mailers.

For recognition, there is always the debate over whether to reward someone that works unsafely but was just lucky. Observations as well as common sense tells us that a large number of employees work a year without an incident, yet their work practices are far from what are acceptable safe practices. We have found an effective compromise is basic recognition for good performance, such as a window decal, thank you card, etc. The employees appreciate it, and it helps remind them of their safety priorities.

Direct Delivery Leadership Council (DDLC)

I have found that the most significant resource that has been developed for DSD safety professionals is the Direct Delivery Leadership Council (DDLC). This is a newly developed trade organization the focuses on DSD-only safety issues. Several leading DSD companies have gotten together and formed this group, whose mission is to identify benchmarking tools and best practices in the DSD business, and share their findings so that we all can improve our safety performance. Many of the programs discussed in this paper have been based on information available through the DDLC. The organization is still in its early stages of development, and is currently using Comprehensive Loss Management, Inc. in Minneapolis, MN for its sponsorship.

In Closing

DSD work environments will challenge the most seasoned safety professional. What we find is that things are not complicated, but they are very difficult. The answers are clear, but the solution requires a complex path of communication, influence, and behavioral change. In the end, all the hard work and efforts are rewarded with a better work environment and improved safety performance.

Bibliography

[1] Federal Register # 66:5916-6135, 01/19/2001, Occupational Injury and Illness Recording and Reporting Requirements