

REPORTER

Prevention Division's Response to the Administrative Inventory

Date: February 1994

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Foreword

The 1992 Prevention Division's Administrative Inventory describes a system at a moment in time.

The external investigators, recognized experts in the field of health and safety, produced their description based on interviews with staff, workers and their unions, employers, and stakeholders in the community. Their report provides commentary and a baseline for measuring future performance.

They concluded their inventory with "Attention Points." These are suggestions for further action by the organization, based on the experience and opinion of the investigators, Drs. Kathleen Rest and Nicholas Ashford.

As part of the W.C.B.'s commitment to this evaluation, it was determined to review the Attention Points every 12 months. This is the Prevention Division's first annual response. It identifies which of the Attention Points require action, lists what has been achieved to date, and outlines future plans.

The Attention Points are organized under headings that reflect the corporate objectives of the Prevention Division. These are:

- Strategic Planning
- Service Delivery
- Resource Allocation
- Policy and Regulation
- Links to Outside Organizations

Mission Statement

*Workplace safety and health is our challenge
Quality rehabilitation and fair compensation
is our commitment
World leadership is our goal*

– Workers' Compensation Board

Introduction

The W.C.B.'s Mission Statement places prevention as the primary challenge facing the organization. This has been emphasized in the legislature; in discussions with workers, their unions and employers throughout the province; in the W.C.B.'s 1992 *Annual Report*; and in the Prevention Division's Administrative Inventory.

Developing short-term actions and long-term strategies in response to the Administrative Inventory has been a valuable process. The Division's staff met with enthusiasm the challenge of reviewing their activities.

They established appropriate actions, defined strategies, set priorities and identified the necessary resources.

When Attention Points had potential effects for other divisions, their representatives were contacted to ensure the Prevention Division accommodated their views.

The following report is presented with one main goal in view: to maximize the use of our prevention resources through better organization.

1. Strategic Planning

Overview

The Prevention Division of the W.C.B. is in a period of transition. Its new strategic plan will position the Division to maximize its resource base, focus its resources on prevention and provide quality service to workers and employers.

The Prevention Division is reorganizing itself to be proactive rather than reactive. It will establish a system of controls that are efficient rather than familiar. It will poise itself for action on a daily basis, and will have the flexibility to adapt to the changing workplace.

“Knowledge is the primary resource for individuals and for the economy overall. However, knowledge is only productive when it is integrated into the task.”

– Peter F. Drucker

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.1 (3)	Page 196	<p>The fundamental mission of the Occupational Safety and Health Division should be the prevention of accidents, injury, and disease in the workplace. Compliance with regulations is just one, albeit an essential, contributing factor. The activities of the Occupational Safety and Health Division should clearly address and reflect this focus on prevention. These activities merit increased visibility within the W.C.B. in order to encourage the primacy of prevention throughout the W.C.B.</p>	<ul style="list-style-type: none"> • The Prevention Division will ensure that existing resources are being utilized to achieve maximum potential. • A proposal for funding has been developed to justify enhanced resources for increased prevention activity. • A reduction in injury frequency would allow a re-allocation of resources from other divisions to further enhance prevention. 	<p>Ongoing Challenge</p> <p>Completed July 19, 1993</p> <p>Future Considerations Dependent on Success</p>
1.2 (95)	Page 217	<p>Space is a problem in many organizations, and the W.C.B. is no exception. Physical separation of Occupational Safety and Health units may have a detrimental effect on the pursuit of the Division's overall mission. Geographic closeness facilitates the interaction and coordination that is called for in this report. The W.C.B. should make every effort to keep the organizational units within the Occupational Safety and Health Division under the same roof.</p>	<ul style="list-style-type: none"> • The Division will link Prevention units along lines that enhance customer service to workers and employers, rather than under one roof. 	<p>Ongoing with Transition Project</p>
1.3 (91)	Page 216	<p>With the inception of the new governance structure, the mission and function of the Research and Standards Department needs clarification. A possible future function for the Department includes the operation of a research and data analysis unit that provides information and forecasting for Occupational Safety and Health Division activities. The work products of this unit would improve the bases for planning and evaluating Division activities.</p>	<ul style="list-style-type: none"> • The Division began a strategic Planning Process to address organizational issues and define goals, objectives and functions in late 1993. The Division is in the transition phase of a reorganization plan outlined on January 4, 1994. 	<p>Spring 1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.4 (96)	Page 217	It is clear that the Occupational Safety and Health Division will need additional resources in order to: 1) expand its inspectional authority into agriculture, silviculture, and fishing; 2) develop an expanded research and data analysis activity; 3) expand its education and consultation, and technical assistance functions, including the training of field officers; and 4) place more emphasis on industrial hygiene, the occupational environment, and occupational disease prevention.	<ul style="list-style-type: none"> • Strategic alliances have been developed with Vocational Rehabilitation and Occupational Disease Services to respond to the increase in repetitive strain injury claims. This will ensure rehabilitated workers are not repeat claims, and may develop “breakthrough” solutions that prevent new claims. • The Division has hired 5 additional officers and trained 25 existing officers to focus on injury and occupational disease prevention in agriculture, silviculture and fishing, and the Board of Governors endorsed a request for significant increase in resources on July 19, 1993. • Worksite educational presentations and consultations have been increased significantly, albeit at the expense of some inspections. • An expansion of research and data analysis is being undertaken by a shift in present resources. Emphasis on industrial hygiene or disease prevention is a function of targeting, rather than resources. 	<p>1993 and Ongoing</p> <p>December 1993</p> <p>Ongoing</p>
1.5 (101)	Page 218	Each of the departments and sections within the Occupational Safety and Health Division need to coordinate their periodic planning efforts in order that they are consistently and mutually reinforcing.	<ul style="list-style-type: none"> • Division-wide strategic, tactical and operational planning is underway. The planning is focusing on a continuous improvement system and involves staff from all levels, regions and departments. 	November 1993 and Ongoing

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.6 (79 & 100)	Page 213 & 218	<p>(79) In order to calculate rates of accidents, injury, and disease in firms and industries (to enhance targeting of Occupational Safety and Health activities), data are needed on worker-hours of exposure. The Occupational Safety and Health Division could work with other organizational units in the W.C.B., e.g., Statistical Services and Assessments, to develop better data on worker hours of exposure.</p> <p>(100) There is a need to enhance the data recording, collection, analysis, planning, and evaluation activities of the Division. Establishment of an integrated information system needs to be considered as does the creation of a unit for research and data analysis (see earlier comments under Data Concerns).</p>	<ul style="list-style-type: none"> The Statistical Services Department presently uses a model that estimates worker exposure by sub-class and firm. We will work with that Department to ensure that the data gathering system described in our response to point 3.14 will achieve this objective. 	March 1994
1.7 (80, 94 & 100)	Page 214, 217 & 218	<p>(80) The Engineering Section should work with other units in the Occupational Safety and Health Division to help develop integrated, accessible, and user-friendly data systems in the Division.</p> <p>(94) This inventory has stressed the need for enhancing the accessibility and use of data by the Occupational Safety and Health Division. The Administration Section needs to play an active role in establishing data systems that are more client-driven and user-friendly.</p> <p>(100) There is a need to enhance the data recording, collection, analysis, planning, and evaluation activities of the Division. Establishment of an integrated information system needs to be considered as does the creation of a unit for research and data analysis (see earlier comments under Data Concerns).</p>	<ul style="list-style-type: none"> The Engineering Department does not have the staff, resources, or mandate to set up Information Systems for the Division. However, it will act in an advisory capacity in systems development. The Division has begun a program to improve the computer skills of all Division staff, especially field officers, who will be fully equipped with computers by early 1995. Engineering is providing field officers with diskette copies of regulations and standards. The data gathering and analysis of point 3.14 will address this issue. 	<p>Ongoing</p> <p>March 1995</p> <p>1994/95</p> <p>1994/95</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.8 (90)	Page 216	Mechanisms are needed to facilitate interaction between the Field Services Department and the Engineering Section. To move the Occupational Safety and Health Division closer to a proactive (rather than reactive) mode of operation, it is essential that field officers and engineers work more closely together. One option might be for engineers to routinely attend meetings held in the regions or for field officers to spend more time with the engineers in the field or on special projects.	<ul style="list-style-type: none"> • Increasing access to engineering reports will reduce routine and repetitive inquiries and allow the Engineering Department to focus more on preventive strategies for specific industrial hazards. • Strategies are being developed cooperatively within Field Operations to ensure engineers will become more field active. 	<p>Following Computer Training June 1994</p> <p>December 1994</p>
1.9 (92)	Page 216	The Occupational Health Department could play an important role in facilitating the prevention of occupational disease and injury. However, at the present time, the Department is completely underutilized by the Occupational Safety and Health Division. Moreover, the medical officers in the Department devote a significant amount of their time to claims-related activities. Enhanced use of this Department will require possible and a reallocation of resources between Claims and Occupational Safety and Health within the Department; continuing education for medical officers in epidemiology, toxicology, and the preventive aspects of occupational safety and health; and increased visibility and interaction of the Department within the Occupational Safety and Health Division, e.g., with Field Services in the context of industrial hygiene and biological monitoring activity.	<ul style="list-style-type: none"> • There are opportunities for cooperation with Medical Services Division where medical advisors in area offices and in Richmond, as well as occupational therapists with ergonomic experience, assist employers and safety committees in establishing a safer workplace. • The Division is presently reviewing its relationship, not just with the doctors, but also with Occupational Disease Services, to see how we can work together. This will include a review of the relationships between industrial hygienists, ergonomists, Occupational Disease Services, vocational rehabilitation specialists and the Occupational Health physicians, and how these relationships can best serve prevention. • Physicians and ergonomists have begun a series of worksite visits and this will increase substantially when the two additional doctors that joined the Department in late 1993 become fully field operational. 	<p>Under Consideration</p> <p>June 1994</p> <p>1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.10 (93)	Page 216	<p>There is no coordinated system for materials development. This leads to an inefficient use of monetary and human resources and to the fragmentation of responsibility for assessing need, production, use, and evaluation of materials. The Occupational Safety and Health Division should establish mechanisms for coordinating the development of educational materials, manuals, video and computer programs, updates, and other printed materials that are produced for use both inside and outside of the Board.</p>	<ul style="list-style-type: none"> • The W.C.B. will form a committee to coordinate materials development. Membership will be from Central Operations, Community Relations and Field Operations. The committee will prepare a protocol for material preparation. • A communications coordinator was hired in January, 1993 to assess the need, production and use of standard practice manuals and other documents originating in Systems/Planning/Research Department. The coordinator has liaised with other departments in developing mechanisms to streamline production of all materials. 	<p>June 1994</p> <p>Ongoing</p>

2. Service Delivery

Overview

Our challenge is to assist workers, their unions and employers in significantly reducing injuries in our B.C. workplaces. The Prevention Division addresses this through inspection, accident investigation, consultation, education and regulation enforcement.

This Action Plan proposes the marshalling of the skills, capabilities and specialties of the Division, complemented by the knowledge and skills of staff in the other divisions, in a continuous improvement cycle. We want to turn every workplace injury or disease incident into an opportunity to create breakthrough solutions to similar incidents. Subsequently we will use that knowledge to prevent entire categories of workplace injuries and diseases.

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.1 (72 & 81)	Page 211 & 214	<p>(72) Noise-induced hearing loss remains a significant problem in the province. The Hearing Conservation Section should continue its efforts to assist employers and workers in the development of effective hearing conservation programs. It should also consider how to better utilize its database for enhancing primary prevention. This will require increased interaction with Engineering and Field Services as well as with the employer and labour communities.</p> <p>(81) The W.C.B. should better utilize its audiology and hearing conservation data for educating firms and for pursuing an active program of primary prevention.</p>	<ul style="list-style-type: none"> • In the short term, the most effective strategy for Field Operations to follow is a zero tolerance of non-protection of workers. • At the same time, officers on field inspections will promote the review of hearing conservation reports by safety committees. These reports list numbers of first time and repeat tests for the firm, and the number of normal, early warning and abnormal test results by occupation, and are an excellent educational vehicle. • Field Operations regional managers will review the hearing conservation statistics for their region to set prevention goals for field officers. Results will be measured using the criteria established by the Hearing Conservation Department. • The Division will take a proactive approach to noise abatement programs. • The information strategy plan identified data needs as a crucial component of our service to workers. The analysis of specific needs and information links for regulation enforcement and primary prevention was started in the fall of 1992. The use of hearing conservation data is part of that analysis. 	<p>Ongoing</p> <p>January 1994</p> <p>January 1994</p> <p>Following Regulation Review</p> <p>Ongoing</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.2 (10)	Page 197	<p>The economy of B.C. has been largely resource-based, and this has led to an emphasis on the special problems and concerns in these industries. However, the emergence of the service sector and other non-traditional forms of employment settings calls for special attention. This will require a recognition, acknowledgment, and sensitivity on the part of the Occupational Safety and Health Division to the types of hazards and problems encountered by workers and employers in these industries. Initially, it may be difficult for officers who are used to inspecting logging and construction operations to appreciate the hazards encountered in health care, service, and retail establishments — many of which are essentially female-dominated industries. The Occupational Safety and Health Division should ensure that its officers have the knowledge, skills, resources, and sensitivity needed to assist workers and employers in these sectors.</p>	<ul style="list-style-type: none"> • The Division is developing hiring and training policies and practices that match skills to needs. • We have organized tripartite industry committees to work with the trade unions and the employers to define and resolve the special concerns in the health care and retail food sectors. • We will identify demographic trends in the workplace and work towards reflecting the nature of the workplace in our staff complement so that workers and employers can communicate with officers in their own language. 	<p>Ongoing</p> <p>1993</p> <p>1994/1995</p>
2.3 (36)	Page 204	<p>The Occupational Safety and Health Division should enhance its efforts to achieve consistency among its field officers and regional managers. This will require the development and acceptance of a common vision and philosophy by W.C.B. and Occupational Safety and Health Division leadership, a review of hiring criteria, the development and use of criteria for effective field service, and improved training and re-training of field officers, their regional managers, and other Occupational Safety and Health Division professional staff.</p>	<ul style="list-style-type: none"> • The Division is establishing its mission and values to complement the W.C.B. vision and to focus activities on Prevention, especially among field officers and regional managers. • We will measure variety and specificity of orders to ensure officers share the same knowledge level, and will use that information to foster consistent application of the regulations in the Regions. • Officer training has been reviewed and will be updated to reflect the Division's new standards. 	<p>1994</p> <p>1994</p> <p>March 1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.4 (37)	Page 204	The Occupational Safety and Health Division must develop criteria for assessing the quality vs. the quantity of its inspections and other field activities. Field officers as well as Occupational Safety and Health leadership should be involved in this process. In this context, the Occupational Safety and Health Division should re-examine the time and activity accounting system in place for field officers.	<ul style="list-style-type: none"> • Officers and managers are preparing written checklists for a quality inspection, as well as simplification of the time and activity record. • The measurement of quality of an inspection will include the pre-inspection activities, hazard analysis, the variety and specificity of orders issued, and the follow-up to ensure compliance. 	December 1993 1994
2.5 (38)	Page 204	The Occupational Safety and Health Division should continue its efforts to develop a more rational and useful targeting system for its inspection and enforcement activities (which should also inform its education and consultation activities).	<ul style="list-style-type: none"> • New analysis of claims data indicates the need to focus on repetitive strain injuries. The Division is collaborating with Occupational Disease Services and Vocational Rehabilitation to effect this change. • Our focus will continue to be on those industries/employers with high rates of injury or disease and those with a high probability of serious health effects or catastrophic accidents. We are looking at the hazard analysis work done in other jurisdictions to help us target industrial disease risk. The Division is presently investigating the best way to access and use this information, as well as information currently stored but not utilized including merit ratings, injury type, and basic injury causation. 	March 1994 February 1994

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.6 (41)	Page 204	Field officers need better training in the documentation, preparation, and presentation, and defense of evidence for recommended sanctions. Similarly, officers assigned to the Variance and Sanction Review Section may benefit from additional training in order to serve as effective and credible hearing officers.	<ul style="list-style-type: none"> • Variance and Sanction officers presently do education sessions in the preparation and presentation of evidence for officers in the regions. The Education Section has prepared a computer-based training package on the penalty process. • Legal Services has prepared a training program for Variance and Sanction officers and regional managers that will ensure procedural fairness and natural justice in the hearing process. • The credibility of the internal review process is often questioned by employers as a flawed or biased process. The R.A.C. Committee on Responsibilities is developing a proposal for an improved process. • The Division had the Justice Institute develop a course in the critical areas listed in the Attention Point which will be given to all officers. The first group of officers were trained in the fall of 1993. 	<p>Complete</p> <p>January 1994</p> <p>1993/94</p> <p>1993/94</p>
2.7 (44)	Page 205	Compliance with W.H.M.I.S. regulations is an essential element of a firm's health and safety program. Without such compliance, the efforts towards internal responsibility will be meaningless. The Occupational Safety and Health Division should stress the importance of W.H.M.I.S. regulations in its activities, and ensure that field officers are making optimal efforts to secure employer compliance with these important regulations.	<ul style="list-style-type: none"> • The Division will focus its efforts on the non-organized and small employers where compliance is weakest, and where we can achieve the greatest short-term gains in W.H.M.I.S. compliance, as well as ensuring that W.H.M.I.S. will be a part of inspections at all firms. 	1994 and Ongoing

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.8 (56)	Page 208	Occupational Safety and Health leadership, regional managers, and officers must be committed to the education and consultation function, and must provide field officers with the skills, support, materials, and resources they need to perform these functions. Additionally, the W.C.B. and Occupational Safety and Health leadership must send clear and consistent signals to employers, workers, and officers about the balance and relationship of these activities to the Division's enforcement functions.	<ul style="list-style-type: none"> • The Division has invested greater resources in education and consultation functions coincident with enforcement activity. Prevention successes and worker, union and employer reaction will indicate the appropriate balance. • The emphasis on education and consultation will include consistent enforcement practices. • The Division will do a needs analysis and develop a proposal for funding the development of educational programs to be broadcast on the Open Learning Agency Community Television Stations. 	<p>Ongoing Monitoring and Adjustment</p> <p>Ongoing</p> <p>1994</p>
2.9 (102)	Page 218	The initial and ongoing training of field officers is a critical requirement for providing a consistently high quality of field services. It is an important vehicle for addressing the issue of consistency early in the officer's career. While the initial officer training program is fairly extensive and, in many respects, well done, it merits some attention. Training materials should be further developed and continually updated to focus on emerging areas of concern, such as biohazards, ergonomics, pesticide exposure, and indoor air quality. Training in presentation, communication, and interpersonal skills as well as in problem solving and conflict resolution is important. The essential components of the field training experience should be identified and built into the program. Enhanced coordination between the Education and Training Section and the Field Services Department will be needed to effect improvements and enhance consistency in the training program.	<ul style="list-style-type: none"> • Field Operations has provided additional resources for development of educational materials. • The Division will incorporate more of the skills training provided by the W.C.B.'s Corporate Education and Development Department in the officer training program, including facilitation and conflict resolution. 	<p>Complete</p> <p>1994 Officer Training</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.10 (103)	Page 219	The Section should consider developing and periodically providing a “preceptor/supervisor” training program in order to ensure that managers and officers who supervise the field component of the initial training program understand its objectives, concur on the educational approach, and consistently reinforce what is being taught in the classroom.	<ul style="list-style-type: none"> Field Operations has integrated this concept into their new officer field training. 	Complete
2.11 (104 & 108)	Page 219	<p>(104) Officers need opportunities to upgrade and update their knowledge and skills. A program of continuing education can provide this opportunity; it can also help address issues of quality and consistency on an ongoing basis. While the Occupational Safety and Health Division does provide some opportunities for continuing education, a more formal and scheduled program could be developed. The Education and Training Section should work with the Field Services Department to develop a program for continuing education and training of officers (and other professional staff). In addition to technical issues relating to the regulations and their enforcement, this training should also provide training in communication skills, conflict resolution, problem solving, and other skills that might enhance officers’ abilities to interact effectively with employers and workers.</p> <p>(108) In undertaking new initiatives, it is important to assess the needs of those who will be delivering the program. The training needs of the newly designated education consultant officers is a case in point. It is commendable that the Occupational Safety and Health Division is providing these officers with the opportunity to enroll in the Instructor Training Program at Vancouver Community College. While it is possible that this program may meet most of the officers’ training needs, its effectiveness should be assessed.</p>	<ul style="list-style-type: none"> The Education and Training Section worked with Vancouver Community College, which is affiliated with the University of Alberta, to establish a credit program for officer instructor training leading to an undergraduate degree in adult education. There is an ongoing assessment program to ensure effectiveness of this training. The Department has established a credit program for officers leading to certification in their Instructor’s Diploma Program at Vancouver Vocational Institute. Almost all managers and officers have received the 1st year credits from B.C.I.T. for officer training in the Occupational Health and Safety Technology Program, which may lead to an Advanced Diploma from B.C.I.T. The Department is evaluating a Distance Learning Program for Occupational Hygiene. A three-day upgrading program was recently given to all officers. The current hygiene officer training course meets Continuing Education credit criteria. 	<p>Complete</p> <p>Complete</p> <p>Complete</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.12 (106)	Page 219	Laboratory personnel should continue to participate in the officer training programs.	<ul style="list-style-type: none"> The Division has formalized the involvement by laboratory personnel in the officer training programs. 	1994
2.13 (107)	Page 219	As part of a continuing education program field officers, especially those in the regions, should be given more opportunity to participate in special projects of the Occupational Safety and Health Division.	<ul style="list-style-type: none"> Special projects and staff development accounted for approximately 18% of officer time in the Lower Mainland and 15.5% of officer time in the regional offices in 1993. Considering the travel time and expenses, participation of officers from the regional offices is at an appropriate level. 	No Action
2.14 (1)	Page 196	The fundamental mission of the Occupational Safety and Health Division should be the prevention of accidents, injury, and disease in the workplace. Compliance with regulations is just one, albeit an essential, contributing factor. The activities of the Occupational Safety and Health Division should clearly address and reflect this focus on prevention. These activities merit increased visibility within the W.C.B. in order to encourage the primacy of prevention throughout the W.C.B.	<ul style="list-style-type: none"> While maintaining high frequency of inspection visits, officers and staff will devote some of their on-site time to consultation and education to foster enhanced worker and supervisor safety and health awareness. Effectiveness will be measured by improved compliance and reduction in occupational trauma and disease. New analytical tools will be developed to target high-risk worksites, processes and organization of work. Response 3.14. 	<p>1994</p> <p>Ongoing</p> <p>1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.15 (8)	Page 197	Employers, workers, and interested members of the public should be able to discern quickly the locus of governmental responsibility for occupational safety and health in B.C. This is not the case at the present time. The W.C.B. should clarify the jurisdictional overlaps and gaps in governmental responsibility for workplace health and safety and the prevention of occupational disease and injury.	<ul style="list-style-type: none"> • The jurisdictional matrix prepared for Drs. Ashford and Rest is very concise and will be used to prepare an information package on jurisdictions for workers and employers. • The Board of Governors is trying to address the jurisdictional issues in a variety of areas and expect to sort out the jurisdictional overlaps and gaps. • We will evaluate the feasibility of a computerized telephone information line that workers and employers can call when they are unsure about regulatory requirements. We will collaborate with our counterparts in other jurisdictions on the solution. 	1994 In Progress 1995

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.16 (9 & 44)	Page 197 & 205	<p>(9) Small and owner-operated firms have special problems and needs that are often overlooked in regulatory systems. The Occupational Safety and Health Division, with the assistance of other organizational units within the W.C.B. (i.e., the Assessments Division) should increase its attention and services to small business, self-employed workers, and outworkers. Unorganized workplaces also merit special attention.</p> <p>(44) Compliance with W.H.M.I.S. regulations is an essential element of a firm's health and safety program. Without such compliance, the efforts towards internal responsibility will be meaningless. The Occupational Safety and Health Division should stress the importance of W.H.M.I.S. regulations in its activities, and ensure that field officers are making optimal efforts to secure employer compliance with these important regulations.</p>	<ul style="list-style-type: none"> • The officer training program will focus more attention on small firms and target them for inspections. • We will target new firms for information sessions on W.C.B. services and requirements. It is possible that grants-in-aid be made available to community educational facilities for small business training. • We will promote distance learning packages. Standard practice manuals and packaged safety programs will be made available to small businesses. • Printed material with industry-specific regulations, such as those which have already been prepared for logging, construction and electrical industries, will be developed for new and evolving industries. • The Division will focus its efforts on the non-organized and small employers where compliance is weakest, and where we can achieve the greatest short-term gains in W.H.M.I.S. compliance. • Training courses for officers regarding W.H.M.I.S. compliance are ongoing. 	<p>1995</p> <p>September 1994</p> <p>March 1994</p> <p>Ongoing with new regulation implementation</p> <p>Ongoing</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.17 (33 & 54)	Page 203 & 207	<p>(33) The W.C.B. and the Occupational Safety and Health Division should help build Occupational Safety and Health expertise in employer and worker organizations through the provision of training, technical assistance, materials, and financial assistance as appropriate. In this context, the W.C.B. should consider supporting the establishment of worker training centres in B.C., similar to those operating in other provinces.</p> <p>(54) There is a need to expand the number of community-based educational activities throughout the province. The Education and Training Section should work with the Department of Field Services to address this need — perhaps utilizing the officers designated to provide education and consultation services.</p>	<ul style="list-style-type: none"> • The Division currently helps build safety expertise through its ongoing education programs for workers and employers. • The Division will assist in strengthening the expertise of unions and employers by providing educational materials for use by trainers and “train the trainer” programs. • We will make all computer-assisted training modules developed for officer training available to the community. • Quality training requires the formulation of standards and assessment of results. The Division will evaluate ways and means of establishing worker training centres. • We will explore the potential and possibility of video long distance education using the facilities of the Open Learning Agency Knowledge Network. 	<p>Ongoing</p> <p>1994</p> <p>1994</p> <p>1994</p> <p>1994</p>
2.18 (49)	Page 207	<p>It was suggested that employers and workers could enhance their understanding of how to achieve compliance with regulations if they had the benefit of the training provided to new officers. The Occupational Safety and Health Division should consider whether members of the employer and labour communities should be able to attend all or part of the initial officer training program or whether an improved and standardized officer training curriculum could be offered separately to these groups, perhaps on a fee-for-service basis.</p>	<ul style="list-style-type: none"> • The training provided to new officers would be an advantage to workers, unions and employers. • All information will be available for review on request. • A tripartite review of training needs of workers and employers will be undertaken in 1994 in order to design a training program. 	<p>Complete</p> <p>December 1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.19 (50 & 51)	Page 207	<p>(50) The Education and Training Section develop a variety of materials for use in worksite-based educational activities. There has been a problem in keeping the regional offices supplied with these materials. This should be addressed.</p> <p>(51) Additional materials for less formal, ad-hoc educational presentations could be developed for use by officers, supervisors, shop stewards, and others in the workplace. These might include prompts for use at tool-box meetings.</p>	<ul style="list-style-type: none"> • The Education and Training Section and the Printing Department have developed reprinting and ordering solutions. • The Education Section will continue to perform needs analyses for educational programs and related materials. 	<p>Complete</p> <p>Ongoing</p>
2.20 (52 & 65)	Page 207 & 210	<p>(52) There is a clear need for materials in other languages and at a variety of literacy levels. These include printed and audiovisual materials developed by the Education and Training Section, the Research and Standards Department, and Community Relations.</p> <p>(65) It is important that the standard practice manuals be easy to use. This means that they must be clear, simple, and direct. Extraneous information should be kept to a minimum. The literacy levels of client groups must be considered in the development and revision of manuals. The need for manuals in other languages should be assessed and addressed.</p>	<ul style="list-style-type: none"> • We will continue to produce printed and audiovisual materials in several languages. • We will use graphics and videos for training whenever possible. • We will evaluate existing documents and produce manuals that address the literacy levels and language needs of workers and employers. 	<p>1993 and Ongoing</p> <p>1994</p> <p>1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.21 (53)	Page 207	Although it is difficult to evaluate the impact of educational programs and materials on such outcomes as injury and disease rates, it is possible to develop measures that provide some insight into their impact. The Education and Training Section should design and implement methods for assessing the use, adequacy, and effectiveness of its materials, courses, and training programs developed for field officers, employers, and workers. This effort should be closely coordinated with any new research and data analysis activity undertaken by the Occupational Safety and Health Division.	<ul style="list-style-type: none"> • The Education and Training Section presently uses classroom evaluations to test learning, and has a pilot project to do follow-up evaluations after two months to measure impact and retention. • We will establish an employer survey for student attitudes following the Safety Concepts Introductory Program in schools. • We will compare historical data on young worker injuries prior to implementation of an educational focus on students in Grade 11. • We will discuss with the Ministry of Education a safety awareness curriculum for children at all levels of the school system. 	<p>Ongoing</p> <p>June 1994</p> <p>June 1994</p> <p>1995</p>
2.22 (57)	Page 208	Workplace-based education is critical because it is often there that the most “teachable moment” occurs. The Occupational Safety and Health Division should continue to encourage and support this activity, and should continually interact with workers and employers to determine how best to provide this service. If the employer community wants an increased emphasis on education, it has the responsibility to provide the opportunities for this to occur.	<ul style="list-style-type: none"> • The officer on site best interacts with workers and employers. Officer training will emphasize the “teachable moment” in core issues related to prevention. • We will develop short, simple presentations that officers can use to take advantage of teaching opportunities. 	<p>Ongoing Improvement</p> <p>1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.23 (61)	Page 209	Employers have demonstrated a willingness to consult with the Engineering Section for advice and technical assistance. The W.C.B. should encourage and facilitate this type of activity.	<ul style="list-style-type: none"> • Engineering will continue to work with field officers and industry to gather feedback on engineering problems and possible solutions. They will use the published <i>Technical Commentary</i> as one way to continue this dialogue. • Engineering is collaborating with in-house ergonomists, Unit Occupational Health doctors, Special Claims, and Vocational Rehabilitation to develop solutions to emerging Repetitive Strain Injury diseases. 	Ongoing December 1993 Ongoing
2.24 (64)	Page 210	It is important that the information contained in standard practice manuals be consistent with existing regulations (assuming their currency and adequacy) and with other educational and policy documents of the W.C.B., such as the <i>Engineering Updates</i> . There have been times when standard practice manuals and the <i>Engineering Updates</i> have been ahead of Occupational Safety and Health regulations. This underscores necessity of having mechanisms for ongoing review and rapid update of regulations.	<ul style="list-style-type: none"> • Information contained in safe work practice manuals is being revised to make it consistent with new <i>Industrial Health and Safety Regulations</i>. 	Ongoing December 1994
2.25 (66)	Page 210	Telephone Information Line. This information line provides an important educational service to workers, employers, and citizens of the province. Additionally, it could be an important source of information for the Occupational Safety and Health Division. Analysis of the calls received could identify areas that need attention or clarification. The Occupational Safety and Health Division should exploit this source of information for its targeting and evaluation activities.	<ul style="list-style-type: none"> • The Division is presently logging and listing the most common questions asked by telephone callers in order to review the information gathered and determine the best course of action. 	1995

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.26 (70)	Page 211	<p>Most physicians and other health care professionals are seriously unprepared to deal with occupational injury and disease. The medical officers in the Occupational Health Department could play an important role in educating their community-based colleagues, but only if these officers are perceived as knowledgeable and credible by their peers. It is important that the W.C.B. provide medical officers with the continuing education they need to enhance their own knowledge and skills in the area of prevention. Then the W.C.B. should encourage and support its medical officers in efforts to provide continuing education and consultation to community-based health care professionals in the area of occupational medicine.</p>	<ul style="list-style-type: none"> • Those physicians in the Occupational Health Department that do not have a degree in Occupational Health have been regularly taking upgrading courses at U.B.C. An acceptable balance has been achieved, given the level of resources available and the other demands on this Department. • Physicians will spend more time in the field with the objective of advising community-based health care professionals. • Occupational Health staff are on the faculty of the University of B.C. and provide educational activities to various professional associations. 	<p>No Change</p> <p>1994</p>
2.27 (58)	Page 208	<p>The education and consultation functions of the Field Services Department can only be enhanced by ongoing collaboration with other organizational units within the Occupational Safety and Health Division (Engineering, Education and Training, Research and Standards, Occupational Health, and First Aid). The expertise (and materials) residing in these units should be better integrated into the education, training, and consulting activities of the Department.</p>	<ul style="list-style-type: none"> • New officer training presently makes use of the expertise of all the departments in the Division. • Departmental goals include a commitment that Engineering, Education and Training, Central Operations, Occupational Health, and First Aid increase collaboration with field officers. 	<p>No Change</p> <p>December 1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.28 (59)	Page 208	The Occupational Safety and Health Division should be commended for undertaking new initiatives in education and consultation. To enhance the success on its education consultant officer initiatives, the Field Services Department and the Education and Training Section should work together to clarify the goals, objectives, functions, and strategies of this new program, and some unit should take responsibility for its operation and evaluation. This will include ensuring that all regional managers understand and buy into the program, and that officers designated to function in this capacity have the time and resources they need to do the job.	<ul style="list-style-type: none"> • Field officers and the Education Section reviewed the goals, and responsibilities of the consultation and education initiatives. We completed this work and will implement the results. • Regional managers will identify and track activities with firms and will decide allocation of resources based on workload. 	1994 January 1994 and Ongoing
2.29 (62)	Page 209	The Engineering Section should work closely with the Education and Training Section and with the Department of Field Services to better integrate ergonomics and engineering concepts into educational materials, presentations, and courses.	<ul style="list-style-type: none"> • The ergonomics subcommittee of the Regulation Advisory Committee (R.A.C.) has completed draft regulations for the “human machine interface.” • Engineering will integrate these and other engineering concepts into educational materials when these regulations take effect. 	Complete Ongoing in 1994
2.30 (63)	Page 209	The value of a well-constructed standard practice manual cannot be over-stated. Employers and workers rely on the information in standard practice manuals to learn about methods of compliance — in spite of the uncertain nature of the manuals’ legal status at this time. The Research and Standards should work with the R.A.C. and the governors to help clarify the legal status of these manuals. They are an important part of the Occupational Safety and Health Division’s educational arsenal.	<ul style="list-style-type: none"> • The Division is reviewing manuals to ensure clear separation of good practice from regulatory requirement. • The Division will prepare manuals to supplement regulations developed by the R.A.C. process such that they demonstrate acceptable practice. 	June 1994 Ongoing as Required

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.31 (71)	Page 211	Physicians can often be effective allies in persuading employers to change processes or practices, especially if an injury or disease has occurred in the firm. The Field Services and Occupational Health Departments should get to know each other better, and explore ways to collaborate in field activities. (The Occupational Health Department has serious resource constraints in the area of prevention. To facilitate the recommended interaction, the W.C.B. may need to provide the Occupational Health Department with additional resources earmarked for prevention.)	<ul style="list-style-type: none"> • The Department is implementing strategies to reduce the Claims workload, to allow the Occupational Health physicians greater time for field activities and research. • Occupational Health will ensure that one physician is always available in the office (perhaps on a rotation basis). The adjudicators from Occupational Disease Services will be able to consult informally and save time and written correspondence. This will speed turn-around time and reduce workload. 	December 1993 Complete
2.32 (75)	Page 212	There may be other organizational units in the W.C.B. that can help enhance the Occupational Safety and Health Division's educational mandate. For example, the Assessments Department could help provide information on legal duties, responsibilities, and regulations to employers during the employer registration process. The Medical Services Division is interacting with workers and employers at one of the most "teachable" moments, i.e., around the occurrence of an injury. The Occupational Safety and Health Division should not overlook the opportunities that present themselves in these other organizational units, and they should explore innovative ways to involve these units in their education and consultation activities.	<ul style="list-style-type: none"> • The Division participated with the Assessments Department and Compensation Services in joint educational presentations. To date these have only involved employer groups (the focus for Assessments), but the feedback has been positive. • We will increase our participation and evaluate other collaborative opportunities. Presently we are exploring an initiative with Vocational Rehabilitation and Assessments. 	Ongoing
2.33 (105)	Page 219	The Engineering Section should continue to be involved in the development and delivery of field officer education — both initial and ongoing.	<ul style="list-style-type: none"> • We agree with this recommendation and will formalize procedures to ensure Engineering involvement. 	1994

3. Resource Allocation

Overview

This Division will integrate our prevention efforts with those of other Divisions to make the Board more responsive to the needs of employers, workers and their unions.

Our focus is on the prevention of workplace disease and injury in British Columbia.

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.1 (4)	Page 196	<p>To fulfill its mission of prevention, the Occupational Safety and Health Division should enhance its ability to anticipate needs and problems. This means that, operationally, its focus should be a moving target that reflects future changes in the technology and economic/industrial profile of B.C. commerce. Working together, the Engineering Section and the Field Services Department can help the Occupational Safety and Health Division emphasize a proactive approach to the prevention of accidents, injury, and disease in the workplace. This may require both units to expand their communication with the governors, W.C.B. leadership, officers, employers, and workers to alert them to potential problems and provide guidance in preventing and/or addressing them.</p>	<p>The Division is working to predict and adapt to changing technology through:</p> <ul style="list-style-type: none"> • Trend and risk analysis, especially for industrial diseases such as repetitive strain injuries. • Developing a program with Vocational Rehabilitation and Occupational Disease Services to assist employers to organize work for rehabilitated repetitive strain injured workers in an attempt to develop "breakthrough" standards/systems/organization of work to prevent future claims. • A sharper focus by Engineering and Occupational Health in evaluating new equipment, processes and organization of work to help define standards and regulations. • Liaison between the Occupational Health Department and the Industrial Disease Standing Committee to assess occupational disease issues. 	<p>1994/95</p> <p>1994</p> <p>1994</p> <p>Ongoing</p>
3.2 (55)	Page 208	<p>If the W.C.B. is serious about its commitment to education and consultation, it should not financially penalize field officers who devote significant portions of their time to these activities.</p>	<ul style="list-style-type: none"> • The Division has created job descriptions for new instructors in the Education Section. A benefit is the release of field officers for much-needed inspection activity. 	<p>Complete</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.3 (86)	Page 215	As mentioned earlier, it has been difficult for the Occupational Safety and Health Division to understand the extent of its decision-making authority under the new governance system. The effect of this uncertainty has been felt most strongly by the Field Services Department, which also has had some difficulty in establishing an expeditious decision-making process. It is not clear that decision-making by consensus of 13 regional managers is the most appropriate method in all cases. The Department of Field Services should consider additional decision-making processes, including, for example, assigning decision-making responsibility to "Committees of Interest" that obtain input from other managers and persons with expertise.	<ul style="list-style-type: none"> • The director will continue to seek input into all decisions. The director will ensure that a "record of decision" document is prepared noting who made the decision and why. • Follow-up by the director in the regions will ensure decisions are consistently implemented. 	Complete Ongoing
3.4 (87)	Page 215	Both officers and regional managers agree that officers need better access to their managers and that administrative burdens sometimes impact the managers' ability to provide it. In order to provide the officers with the interaction and supervision they need, it may be necessary to provide some managers with assistance. Possible options include the creation of a new position (especially in the regions). This position might be for a supervisor, assistant regional manager, or executive assistant.	<ul style="list-style-type: none"> • The Division is committed to the model of a well-trained, flat organizational structure and the introduction of another level of management runs contrary to this model. • The Division will reduce the unnecessary administrative burden on managers. 	December 1993 and Ongoing
3.5 (88)	Page 215	The W.C.B. should reconsider the reporting relationship of Occupational Safety and Health secretaries in the Regional Offices.	<ul style="list-style-type: none"> • Discussions between Compensation Services regional managers and Prevention regional managers have resolved these issues. 	Complete

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.6 (110, 111, 42)	Page 220 & 205	<p>(110) The Occupational Safety and Health Division should focus some attention on developing better criteria for evaluating officer effectiveness. These criteria must be reviewed and updated as the focus and activities of the Occupational Safety and Health Division evolve and change.</p> <p>(111) Employers and workers demand a competent and highly skilled cadre of field officers. The Occupational Safety and Health Division must maintain a proper balance between “training up” and recruiting new staff.</p> <p>(42) The issue of generalist vs. specialist field officers was discussed in Chapter 10. The Occupational Safety and Health Division should carefully consider creating, maintaining, and deploying the proper mix of these officers. Decisions in this area will affect recruitment policies and hiring practices.</p>	<ul style="list-style-type: none"> • It is difficult to determine a “proper” balance. There is an identified need to provide career opportunities in the Division. There is also a need to ensure officers have the expertise to enforce the regulations and perform hazard analysis. See point 3.7. • Measurement criteria for the effectiveness of prevention activities are being developed. • Provincial and Regional needs are met with the best use and mix of resources. Provincially, the Division needs specialist expertise that officers can call on. Regionally, officers must be generalists who can respond to all industries. Hiring practices target provincial needs first, regional needs second. • Hiring criteria will be established using a periodic review of the industrial profile of the province. 	<p>December 1993</p> <p>1994</p> <p>1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.7 (109, 114)	Page 219 & 220	<p>(109) The Occupational Safety and Health Division should continue to explore and enhance opportunities for the professional advancement of its staff. These include the Instructor Diploma Course offered by Vancouver Community College and, perhaps, the diploma and degree programs offered by other academic institutions in the province. The W.C.B. should also support safety and hygiene officers who wish to pursue professional certification in their fields.</p> <p>(114) The W.C.B. and the Occupational Safety and Health Division need to consider how to provide better opportunities for career advancement of both professional and support staff within the Division and the W.C.B.</p>	<ul style="list-style-type: none"> • The Division will examine the possibility of line transfer into other divisions and secondment to other agencies or industry. • We will establish criteria for career advancement in cooperation with Human Resources and the C.E.U. The present collective agreement allows for professional development with assistance from W.C.B. • We will examine positions in Field Operations in terms of requirements and duties to establish the possibility of creating new positions for a career path. 	<p>1995</p> <p>1994</p> <p>1994</p>
3.8 (112)	Page 220	<p>There are few women and visible minorities in management positions within the Occupational Safety and Health Division. Hiring policies and criteria should be re-examined in terms of affirmative action, and the Occupational Safety and Health Division should strive to develop a personnel profile reflective of the client communities it serves. Expansion of Occupational Safety and Health Division activities into new areas, such as agriculture and fishing, and emerging issues, such as biohazards and ergonomics, may provide excellent opportunities for affirmative action.</p>	<ul style="list-style-type: none"> • The Division will publicize future job openings in a wider variety of publications. • We will target specific requirements for emerging health and safety issues in non-traditional industries, such as health care and retail food sectors, where the qualified people are predominantly women. • We are developing competency-based hiring that will eliminate systemic barriers to women, visible minorities, aboriginal people and disabled persons. • A two-year Special Measures field officer training program has been developed that is targeted to women candidates. This program, if implemented, will address the gender imbalance in Field Operations. 	<p>Current</p> <p>1994</p> <p>1994</p> <p>1994/95</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.9 (67)	Page 210	The laboratory is an important resource for field officers, especially occupational hygiene officers, as well as for employers and workers in the province. The W.C.B. should nurture and support this resource, and the W.C.B. and the Occupational Safety and Health Division should better integrate the services and expertise of this unit with its other activities.	<ul style="list-style-type: none"> • We have examined the laboratory's capability to maintain services and have put forward a proposal for resources to ensure it is relevant and uses current technology. • We will review career paths for laboratory personnel into industrial hygiene. • We have enhanced laboratory orientation in field officer training programs to ensure the officers fully understand the resources at their disposal. A recent survey of field officers shows strong support for the laboratory's services. 	1994 1994 Complete
3.10 (69)	Page 211	The W.C.B. should consider promoting and expanding the sampling and analytical services of its laboratory to employers (and others) on a fee-for-service basis.	<ul style="list-style-type: none"> • The laboratory has undertaken fee-for-service activities for the last six years. The criteria for this activity has always been fourfold: <ol style="list-style-type: none"> 1. The work of the field officers and physicians always has top priority. 2. The analysis requested concerns the health or safety of workers. 3. The requested analysis involves some measure of quality assurance. 4. The program does not compete head-to-head with the private sector. 	No Change
3.11 (68)	Page 210	Asbestos will continue to be a major problem in most jurisdictions in North America, and there is a need to assure the proficiency of asbestos analytical services. Quality assurance in this area appears to be a worthy endeavor for the W.C.B.	<ul style="list-style-type: none"> • Laboratory Services has designed a proposed quality assurance protocol and a system of monitoring for the laboratories in British Columbia that incorporates some cost recovery. • We will evaluate this proposal for efficiency and effectiveness. 	Complete 1994

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.14 (76)	Page 212	<p>The W.C.B. has or has the potential to collect a wealth of data that can be used to more effectively target, plan, and evaluate the compliance and prevention-oriented activities of the Occupational Safety and Health Division. There is a need in the Occupational Safety and Health Division to collect, enter, and analyze more and better data to fulfill its functions. Data systems should be integrated, client-driven, easily accessible, and user friendly.</p>	<ul style="list-style-type: none"> • With the assistance of Statistical Services, the Division will evaluate the opportunities for analyzing data currently being collected. • The Division has developed a pilot project for a client-driven accident reporting system and form 7 that also provides on-site analysis for employers and safety committees. The system will provide officers with the data to analyze trends and risks, target activities, and evaluate and process claims. This system will be reviewed with employers, workers and unions. The pilot is underway at firm locations and projected to be completed by June 30, 1994, such that full implementation can begin in the third quarter of 1994. 	<p>1994</p> <p>1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.15 (77)	Page 213	<p>The Occupational Safety and Health Division should consider establishing a small research and data analysis unit which could provide timely information about needs and trends. Such a unit could utilize the data currently available within the W.C.B. to correlate factors useful for targeting (and evaluating) Occupational Safety and Health enforcement, education, and consultation activities and for identifying needs to change regulatory requirements and activities. Such data include claims data; accident and injury reports by employers, workers, and field officers; industrial hygiene measurements by employers and field officers; occupational disease and health effects data; inspection reports, orders, warning letters and penalty assessment recommendations (as well as regulations cited or not cited therein); variances; program review information; educational presentations; and health and safety committee minutes. This unit could also help track changes in technology and shifts in industrial activity, as well as compare injury and disease data for specific industries/occupations with those in other jurisdictions. (See Chapter 7)</p>	<ul style="list-style-type: none"> Examining the establishment of a Research and Trend Analysis Section will be part of the review of the Planning/Systems Department. Such a section would be responsible for evaluation of current prevention programs. The Division is not presently resourced to do long-range studies required to correlate accident causation and intervention results. We will work with Information Systems Division (I.S.D.) and Compensation Services to focus on the best use of available data for prevention purposes and develop a new system as described in 3.14. 	<p>1994</p> <p>1994/95</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.16 (78, 94)	Page 213 & 217	<p>(78) It is important to recognize that claims for injuries and illnesses result from an occurrence in the workplace (an “accident” or an exposure). Prevention of these occurrences requires information on their cause. Thus, it is important that the W.C.B. and the Occupational Safety and Health Division consider ways to collect better information on the causes of such occurrences, even those that do not result in a claim (the so-called “near-miss”). One possibility is to redesign claim form No. 7, the Employer’s Report of Injury, to include more information on the causes of the incident that resulted in the claim. This would go part of the way to gaining the needed information, but not be sufficient, because claims forms do not capture the “near-miss.” Enforcement of existing employer obligations to report events with the potential for serious injury would therefore also be needed.</p> <p>(94) This inventory has stressed the need for enhancing the accessibility and use of data by the Occupational Safety and Health Division. The Administration Section needs to play an active role in establishing data systems that are more client-driven and user-friendly.</p>	<ul style="list-style-type: none"> • The Division is collaborating with Compensation Services to collect the necessary “cause of accident” data from Form No. 7. Keith Mason from Statistical Services is representing the W.C.B. on the C.S.A. review of work injury information. • A computerized accident reporting system is being developed to allow employers to forward the necessary information to the Division electronically or on disk. Small employers can use the same format in a paper version. The system will allow the employer to more easily generate reports on site for trend analysis by the safety committee. Division officers will use this system to identify high-risk, high-incidence activities and workplaces. 	<p>Current</p> <p>Phase 1 — Pilot January 1994</p>
3.17 (89)	Page 215	<p>It is not clear that the geographic split of the regions is sensible. For example, the city of Vancouver is divided into three regions, each with a different regional manager. The Occupational Safety and Health Division may want to review the way it has divided the province for Occupational Safety and Health purposes, especially in the lower mainland.</p>	<ul style="list-style-type: none"> • We have reviewed the geographic split of regions in conjunction with Claims and Assessments and new boundaries are being developed. 	<p>Complete</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.18 (99)	Page 218	The W.C.B. should be prepared to augment the laboratory resources as needed to accommodate future activity and shifts in emphasis that may evolve, e.g., expanded monitoring of indoor air quality and increased biological monitoring. The laboratory should serve as a resource to the Occupational Hygiene Committee in some of its deliberations.	<ul style="list-style-type: none"> To recruit and keep top-quality laboratory personnel, the focus needs to exceed day-to-day analysis. Laboratory personnel will be involved to help review contaminant levels and sampling techniques. Laboratory personnel will interact with the Occupational Health physicians to augment trend analysis in industrial diseases and to help develop the Division's information system. 	1994
3.19 (113)	Page 220	Job requirements and criteria also need to be re-examined in terms of career advancement within the W.C.B., for example, for first aid officers, engineers, and O.S.H.O.s.	<ul style="list-style-type: none"> In 1993/1994, the Division will work with Human Resources and the C.E.U. to review job requirements and the possibilities of career advancement. Currently, over 20% of the Division staff have moved from other positions within the W.C.B. to a higher pay group as occupational health officers, occupational safety officers, managers or directors. The training program outlined in point 3.8 will also address this issue. 	1994 December 1994
3.20 (115)	Page 220	Similarly, it is important that Occupational Safety and Health Division have the personnel, especially among the field staff, to interact effectively with the workers and employers who speak languages other than English. This will require that the Division upgrade its capability in Punjabi, other languages of the Far East, and Spanish.	<ul style="list-style-type: none"> This problem appears to be prevalent in the Lower Mainland. Pictorial and video-based educational material will be translated to deal with this issue. Interpreters will accompany field officers as required. A new agriculture field officer hired in the Lower Mainland has language skills appropriate to address some client needs. 	Ongoing

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.21 (2)	Page 196	<p>The Occupational Safety and Health Division is in the best position to promote the mission of prevention within the W.C.B. In order to do this, the Division must be proactive and aggressive in pursuing interaction with other Divisions within the W.C.B. Although its activities are unique and important, the Division must not become isolated from other activities of the Board. Indeed, other organizational units within the W.C.B. (such as Statistical Services, Assessments, Medical Services, and Community Relations) can enhance the effectiveness of the Occupational Safety and Health Division. These relationships must be firmly established and cultivated.</p>	<p>We are:</p> <ul style="list-style-type: none"> • Evaluating affordable means for main-frame information to be collected centrally and shared by all users. This is also discussed in point 3.14. • Determining the opportunities that exist for efficient sharing of information about occupational health claims and hazards between field officers and Occupational Disease Services. • Inviting other departments (such as Rehabilitation and Occupational Disease Services) to explain their needs at new officer training and at regional meetings. This will better prepare field officers to work cooperatively to reduce workplace risk. • Forging partnerships with Claims staff to share injured worker/worksites information and alter the organization of work that results in disease claims such as repetitive strain injuries. An informal model for this exists in some area offices, where adjudicators discuss worksite issues with officers. • Developing a system to provide information to Assessments about non-registered firms, so that firms within our jurisdiction are registered and can be targeted for prevention activities. • Working with Community Relations to provide our clients with necessary information e.g. media releases, trade shows, etc. • Cooperating in the production of a joint presentation /information package with Compensation Services, Community Relations and Assessments, for newly registered firms, e.g. the Aquaculture Seminar held in February '94. 	<p>1994/95</p> <p>Ongoing</p> <p>1994</p> <p>1994</p> <p>1994</p> <p>Ongoing</p> <p>1994</p>

4. Policy and Regulation

Overview

The development of a policy and decision-making process that is open and responsive to stakeholders is the overriding consideration as the Division considers its role in influencing W.C.B. policy and regulation.

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.1 (26)	Page 201	The organization of work has a significant influence on efforts to prevent and reduce accidents, injuries, and disease in the workplace. The Regulation Advisory Committee should consider how this factor interacts with other regulations and whether regulations are needed to address organization of work issues directly.	<ul style="list-style-type: none"> The Ergonomics Subcommittee, as it prepares codes of practice, is addressing some concerns about organization of work. Regulations regarding shift work, staffing levels and work/rest regimes could have impact on the permissible concentrations of chemical contaminants listed in the present <i>Industrial Health and Safety Regulations</i>. Organization of work is an emerging issue that will require review by engineers, ergonomists, Occupational Disease Services, Vocational Rehabilitation specialists and Occupational Health physicians, in conjunction with employers, workers and their unions. The W.C.B. Statistical Services Department will assist by reviewing claims experience as a function of work organization. 	Second Quarter 1994
4.2 (1.5)	Page 199	In order to avoid undue delay in revising regulations, the Regulation Advisory Committee should establish a mechanism for ongoing review of the regulations.	<ul style="list-style-type: none"> The Division supports an annual review of the <i>Industrial Health and Safety Regulations</i>, and will assist in the process determined by the Board of Governors. 	As Dictated by Governors
4.3 (16)	Page 199	In its deliberations about permissible concentrations of toxic substances, the Regulation Advisory Committee should consider the adequacy of the 15-minute (short-term) exposure limits as well as the eight-hour permissible concentration limits for these substances.	<ul style="list-style-type: none"> The R.A.C. is considering the adequacy of the limits in light of new toxicological information. 	1994

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.4 (17)	Page 199	Regulations should be considered that establish action levels for environmental monitoring by employers and for notification and training of workers exposed to toxic substances, noise, and radiation.	<ul style="list-style-type: none"> We agree with the establishment of action levels, which may require significant technical input prior to the finalization of the regulations. Once the regulations are in place, employers and workers or consultants would perform the monitoring. The information gained would benefit future regulatory and policy considerations, provided that results were available for review by the Division. 	Following Regulation Review 1994/95
4.5 (18)	Page 199	The Regulation Advisory Committee should exploit the material and information developed by the Occupational Safety and Health Division in the form of standard practice manuals and engineering updates in the regulation review process. The status of these documents should be clarified, and employers and workers should be given clear signals concerning the implications of compliance with recommendations contained in these documents. For example, the Regulation Advisory Committee could incorporate by reference into its revised regulations any work practice or recommendations found in these documents. Alternatively, the governors could, as a matter of policy, provide that compliance with procedures contained in these documents will constitute a rebuttable presumption of compliance.	<ul style="list-style-type: none"> The Engineering Department prepares two documents for public distribution. <i>Engineering Updates</i> are documents that discuss technical issues related to the application of regulations. <i>Technical Commentaries</i> are documents that provide safe work practice prevention information. Both can be used as resource material during the review of policies and regulations. Standard practice manuals assist industry in reaching compliance with regulations, and provide safe work practice information. The R.A.C. Committee will help to determine the legal status of these manuals. This issue is also discussed in Attention Point 2.30. 	Following Regulation Review Process Ongoing

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.6 (12)	Page 198	<p>Although it is clear that the Board of Governors is responsible for making policy under the current structure, it is not at all clear how “policy” is defined. For example, some procedural and operational changes could be construed to have policy implications. At present, there is considerable confusion about the boundaries of decision-making within the Occupational Safety and Health Division. The governors should focus on this issue and, by illustrative examples, clearly define the types of decisions that fall inside and outside of its purview. Needed changes in or clarifications of Occupational Safety and Health policy and procedure should not be hamstrung by a time-consuming and bureaucratic process. The formation of a “Secretariat” or active policy group attached to the Board of Governors for Occupational Safety and Health matters might be one way to streamline the policy-making process.</p>	<ul style="list-style-type: none"> • The Division has proposed several policy revisions that were identified by the Board of Governors in 1993. As new regulations are created, further revisions to the policy manual will be proposed and the end result should be clear policy. • The Secretariat proposed by the governors in August 1993 could assist in ensuring worker and employer input to new policy in its developmental phases. 	<p>1994/95</p> <p>1994</p>
4.7 (13)	Page 198	<p>The Occupational Safety and Health Division leadership should continue to advocate for needed policy changes with the governors. Department and Section heads should continually strive to present clear, reasoned, and direct proposals to the governors.</p>	<ul style="list-style-type: none"> • A policy development section, being developed in the W.C.B., is responsible for coordination of W.C.B. policy publication. The Division will continue to work with the policy section to formulate proposed policies and participate in a process of stakeholder review. Following review and revision, the Division will present the proposed policies to the Executive Committee, then the Board of Governors. 	<p>Ongoing</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.8 (14)	Page 199	Many of the regulations under consideration are outdated and clearly inadequate. It is important, both during and after the regulation review process, that a fast-track process be developed to revise or put into place regulations that address hazards or situations where undue delay would endanger the health or safety of workers. This might include a mechanism for establishing emergency temporary regulations by the Regulation Advisory Committee or by the governors, through the establishment of appropriate policy.	<ul style="list-style-type: none"> The Division supports a fast-track process that continues after completion of the regulation review, allowing the Board to react quickly to changes in knowledge or technology. 	Following Regulation Review
4.9 (19)	Page 200	There may be areas in which revised regulations (as well as standard practice manuals and <i>Engineering Updates</i>) should link ergonomic and engineering considerations that address the human-machine interface.	<ul style="list-style-type: none"> The Ergonomics Subcommittee of the R.A.C. is presently formulating a code of practice for ergonomics. The code will link engineering and ergonomic considerations. 	Following Regulation Review
4.10 (20)	Page 200	Although Industrial Health and Safety Regulation No. 8.24 places an affirmative obligation on a worker to refuse to carry out hazardous work, it is not clear that subsection (6) provides adequate protection for the worker who exercises this right, especially in the context of non-unionized workplaces. The W.C.B., with input from the labour and employer communities, should assess the adequacy and responsiveness of the legal machinery, both inside and outside of the W.C.B., for safeguarding the worker from retaliatory action by an employer. Burdensome legal processes or procedures for addressing possible discrimination create a chilling effect on the exercise of the right, even in the absence of actual discrimination.	<ul style="list-style-type: none"> This issue is being reviewed by the Board of Governors and the Regulation Advisory Committee. 	1994/95

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.11 (22)	Page 200	If internal responsibility is to be achieved, it is important that the Regulation Advisory Committee consider regulations that address the role and power of health and safety committees, even though the issue is bound to generate debate and controversy. For example, with appropriate safeguards for possible abuse, regulations could vest these committees with the ability to conduct inspections and audits, stop work operations if necessary, obtain needed records and reports, institute changes to improve safety conditions, and order remediation of unsafe work operations, practices, and conditions. The Regulation Advisory Committee may also want to consider extending the requirement for health and safety committees to all workplaces.	<ul style="list-style-type: none"> This issue is being reviewed by the Board of Governors and the Regulation Advisory Committee. 	1994/95
4.12 (23)	Page 201	Regulations may be needed to ensure that health and safety committee members have the necessary knowledge and skills to fulfill these functions. This could be accomplished through regulations that mandate specific training for committee members. Regulations that particularize the duration and type of training for supervisors and other workers may also be needed.	<ul style="list-style-type: none"> This issue is being reviewed by the Board of Governors and the Regulation Advisory Committee. The Division provides some training to safety and health committee members. 	1994/94 Ongoing
4.13 (24)	Page 201	There are a number of emerging issues that merit attention by the Regulation Advisory Committee. These include ergonomics, robotics, indoor air quality and ventilation, chemical sensitivity, blood-borne pathogens, pesticides, asbestos removal, and other non-traditional hazards, such as violence in the workplace.	<ul style="list-style-type: none"> The R.A.C. process is currently reviewing all of these emerging issues. Regulations on Violence in the Workplace have been created by the Board of Governors. 	1994/95

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.14 (25)	Page 201	To be on the cutting edge of regulatory policy, the Regulation Advisory Committee should identify and exploit opportunities to encourage technological change using technology-forcing regulations. The Engineering Section should assume an active role in promoting the development and use of technology-forcing regulations and policy at the W.C.B.	<ul style="list-style-type: none"> The Division will identify information on advances in technology and keep the Board of Governors and the R.A.C. informed. Engineering staff will be central to this program. 	1994
4.15 (27)	Page 201	As a matter of policy, the Regulation Advisory Committee and the governors should consider expanding the regulations for which there is a mandatory consideration of penalty assessments (at present, the list includes 11 high risk work situations). Possible candidates for addition include the lack of an operational health and safety program, the lack of a functioning health and safety committee, the lack of fall protection, and exposure to toxic substances in excess of the permissible concentration limits or action levels. In this context, the Regulation Advisory Committee may want to consider developing criteria that define an acceptable health and safety program and a functioning health and safety committee. (This, in turn, would require appropriate education and training of field officers, employers, and workers.)	<ul style="list-style-type: none"> As we perform better trend analysis, the Division will be able to advise the R.A.C. and governors on mandatory penalty assessments. 	1994/95

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.16 (28)	Page 201	There is a gap in the W.H.M.I.S.-type right-to-know regulations in most jurisdictions. This relates to the provision of information on possible substitute materials and their attendant hazards. The Regulation Advisory Committee could consider expanding the provincial W.H.M.I.S. regulations to enhance the availability and/or the transfer of this type of technological information from employers (or provincial manufacturers/importers) to workers. Additionally, the Regulation Advisory Committee may want to ensure that W.H.M.I.S.-type coverage is extended to workers soon to come under the W.C.B.'s Occupational Safety and Health jurisdiction, workers in agriculture and fishing.	<ul style="list-style-type: none"> W.H.M.I.S. regulations are created federally through cooperation with the provinces. The Division representative on the Federal/Provincial committee will encourage consideration of this Attention Point concept at the interprovincial level. 	Ongoing
4.17 (29)	Page 202	It is not possible for regulations to keep pace with the introduction of new chemicals, work practices, and technological innovations in the workplace. Thus, it is important that employers, workers, and field officers understand and appreciate the use of "general duty regulations" (such as I.H. & S. Regulations 2.04, 8.04, and 12.01) to help ensure that injury and disease will not occur in the workplace.	<ul style="list-style-type: none"> Consistency is an issue when officers use general duty regulations in the absence of specific regulations, standards or directives. Full understanding of the proper application of general duty regulations by field officers and industry is necessary to achieve this recommendation. 	1994/95

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.18 (30)	Page 202	<p>Medical surveillance and biological monitoring can be important adjuncts to preventing occupational disease. The Regulation Advisory Committee may want to consider revising and “gazetting” the requirements in Section 78 of the <i>Industrial Health and Safety Regulations</i>, but only with due consideration of worker confidentiality, worker education and training, the provision of medical removal with income protection and job security for workers found to have high body burdens of toxic substances, and other procedural safeguards. Professional staff in both the laboratory and in Occupational Health could assist the Regulation Advisory Committee as it considers both occupational hygiene and biological monitoring requirements.</p>	<ul style="list-style-type: none"> • The Division is reviewing its occupational environmental control program evaluation. • This Attention Point fails to mention the issue of voluntary versus required participation by workers in any monitoring scheme. This is a Charter of Rights issue and mandatory monitoring may fail a legal challenge. 	1994
4.19 (31)	Page 202	<p>Employers and workers may easily become lost in the maze of Occupational Safety and Health regulations to which they are subject. The Regulation Advisory Committee may want to consider developing easily accessible formats and/or subsets of regulations for specific industries, industrial processes/hazards, and occupations. However, it is also important that the regulations themselves be collected in one comprehensive document so employers, workers, and field officers can appreciate the full measure of their responsibilities.</p>	<ul style="list-style-type: none"> • The Division supports any practical means of simplifying formats and systems to deliver “user-friendly” regulations to workers and employers. 	

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.22 (48)	Page 206	The creation of an additional bureaucratic structure such as an independent tripartite review panel or the creation of independent professional hearing officers for informal review, or a formal appeal structure outside of the W.C.B. should not be considered at this time. Such options should only be considered after the new Appeal Division has had a chance to function and after other options for changing the informal review process, such as those listed above, have been evaluated and found wanting.	<ul style="list-style-type: none"> • The Division will ensure that our input into the process is designed to keep it as efficient as possible. • The R.A.C. subcommittee on Responsibilities is considering this issue. 	Ongoing
4.23 (60)	Page 209	The Engineering Section should continually call for a focus on primary prevention by the W.C.B. and by the employer and labour communities.	<ul style="list-style-type: none"> • The Engineering Section regularly provides industry with recommendations for good practice that meet or exceed the regulatory requirements. It will continue to evaluate primary prevention opportunities and produce draft regulations for the R.A.C. review. 	No Change
4.24 (82, 83, 84)	Page	<p>(82) The W.C.B. could consider strengthening the economic incentives for prevention by:</p> <ul style="list-style-type: none"> - Administering additional levies on employers who, through gross negligence or wanton disregard for safety, cause a worker's death or serious disablement. <p>(83) Expanding the list of high risk work situations which result in mandatory consideration of a penalty assessment.</p> <p>(84) Reducing compensation assessments for firms with effective health and safety programs/committees.</p>	<ul style="list-style-type: none"> • These issues are being considered by the Governors Committee on Regulation Review. 	

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.25 (85)	Page 214	The W.C.B. should resist changes in E.R.A. until other measures discussed above have been attempted and evaluated. Before E.R.A. is changed, the W.C.B. should develop better measures of accident, injury, and disease rates for use in E.R.A. For example, the use of worker-hours of exposure would be significantly more meaningful than payroll.	<ul style="list-style-type: none"> This issue is being considered by the Board of Governors. 	
4.26 (97)	Page 217	The W.C.B. will need legal advice in fulfilling its regulatory, inspectional, and appeal functions relating to Occupational Safety and Health. The Legal Services Division must enhance its familiarity with, expertise in, and commitment to occupational safety and health in order to assist the W.C.B. and the Occupational Safety and Health Division in pursuing proactive policies and programs for worker health and safety. Areas of current interest include the legal status and use of the Occupational Safety and Health Division's standard practice manuals and the updates developed by the Engineering Section.	<ul style="list-style-type: none"> The Division will continue to work with Legal Services to clarify issues of mutual interest. 	1994

5. Links to Outside Organizations

Overview

The Division will focus on forging and nurturing strategic alliances with other agencies in order to meet mutual goals more efficiently.

Through enhanced cooperation with other agencies, the Division will strive to reconcile the multi-jurisdictional system for enforcing worker health and safety in the province.

Examples of new relationships which are being struck are the Division's participation in a steering committee with the Department of Agriculture, Fisheries and Food and the Ministry of Environment, Lands and Parks to implement pesticide training and certification.

A more formal alliance between the Occupational Health Department and officials in the Ministry of Health responsible for environmental health has been established.

Examples of traditional relationships which work well are the ongoing links between the Engineering Department and the Canadian Standards Association, the Electrical Safety Branch and the National Building Code.

Through a free and frank exchange of information with outside organizations, the Division both provides and obtains a valuable service. We will review our data collection process to ensure that we are distributing research data that meets the needs of most stakeholders. We will continue to provide all possible information within the restrictions of the *Freedom of Information and Protection of Privacy Act*.

We will increase our collection of feedback from industry in order to prepare more effective health and safety information, training programs and materials. Employer and Union involvement will be sought during this preparation. The Division will continue to promote the availability of awards to organizations for the purpose of research and education.

The Division will expand its work with Industrial Health and Safety Committees, and will invite employer and worker participation at the close of every inspection. Increased attention will be paid to the Information Hotline, which answers about 25,000 calls annually from individuals and organizations requesting safety and hygiene information.

Finally, new regulations provide an ideal opportunity to create working relationships with such organizations as the B.C. Federation of Agriculture and the United Fishermen and Allied Workers' Union that were not formerly directly involved with the Division.

Point	Cross-reference	Text Attention Point	Action	Completion Date
5.4 (34)	Page 203	The W.C.B. should consider providing grants-in-aid to increase the institutional capability in occupational safety and health. Possible recipients include individual firms (especially small- to medium-sized), trade associations, unions, voluntary organizations, and academic institutions.	<p>On October 26, 1992, the Board of Governors approved a new Grants and Awards policy. This policy states in part:</p> <p><i>“The W.C.B. will consider granting financial support for the following purposes which are consistent with the W.C.B. mission and priorities of the Governors.. [including] Education or training programs related to the Prevention, Rehabilitation and Compensation in B.C. . . .”</i></p> <p>In 1992 and 1993, the B.C. Safety Council took advantage of the grants and awards policy to help fund its education activities, including the Construction Safety Officer Certification Program. The Prevention Division will examine ways and means of assisting trade unions, firms and bipartite associations to develop or increase their capability for occupational health and safety training and awareness programs.</p>	Ongoing
5.5 (35)	Page 203	It is unlikely that the W.C.B. will develop in-house resources to conduct the needed epidemiologic studies of occupational injury and disease or to conduct other studies and research programs relating to injury and disease prevention. The W.C.B. should, therefore, encourage academic institutions and other scientific and research bodies to focus on occupational injury/accident and disease prevention and to make full use of the data collected (or collectable) by the W.C.B. and the Occupational Safety and Health Division.	<ul style="list-style-type: none"> • In 1992 and 1993, W.C.B. made Grants and Awards totalling approximately \$700,000 to fund continuing and specific workplace-related research by B.C. colleges and universities. Hygienists from the Division have worked with the B.C. Research Council and the B.C. Cancer Control Agency, on research initiatives. • We will provide all internal data to research institutions, trade unions and firms within the restrictions of the freedom of information and privacy regulations. 	1993

Point	Cross-reference	Text Attention Point	Action	Completion Date
5.6 (39)	Page 204	<p>The Occupational Safety and Health Division should consider enhancing the use of health and safety committees in enforcement. This could provide a more focused look at the activities and recommendations of health and safety committees and routine review of committee and assessment of committee meeting minutes. Appropriate checks and balances on committee powers also need consideration.</p>	<ul style="list-style-type: none"> • The Division presently supports health and safety committees, not only in enforcement, but in consultation and education. This includes review of committee minutes during inspection. Safety committees are encouraged to involve themselves in problem solving as well as policy issues in the workplace. • We will expand this process by assisting Industrial Health and Safety committees to develop an effective internal responsibility system, which will reduce the demands on officers' time. • The R.A.C. tripartite Subcommittee on Responsibilities is examining ways and means of enhancing Industrial Health and Safety committee activities and the appropriate duties, and responsibilities as well as the appropriate checks and balances. 	<p>No Change to Present Practice</p> <p>1995</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
5.7 (40)	Page 204	As stated above, the Occupational Safety and Health Division should enhance its services to small employers, marginal firms, and unorganized workplaces. The W.C.B. should encourage the employer and labour communities to assist these firms by providing advice and technical assistance on achieving compliance with regulations and providing a safe and healthful work environment. The Employers' Adviser and the Workers' Adviser could also be encouraged to assume a more proactive role. The Occupational Safety and Health Division may also need to place more emphasis on non-traditional industries, health care and service sectors, and new industries.	<p>Points 2.16 and 2.17 also raise these issues.</p> <ul style="list-style-type: none"> • The Division will enhance its service to small, marginal, and unorganized employers through the actions outlined in point 3.8. • Tripartite committees have been established for health care and retail trade sectors (composed of physicians, engineers, ergonomists, safety and hygiene officers, Occupational Disease Services, Claims and Vocational Rehabilitation specialists). • Through its participation on the newly-formed Farm and Ranch Safety and Health Associations committee, the Division will work to ensure enhanced service to the agriculture industry. 	<p>1994</p> <p>1994/95</p> <p>Ongoing</p>
5.8 (43)	Page 205	The Occupational Safety and Health Division, along with the R.A.C. and the governors, needs to consider issues of parity in worker and employer rights. Some of these are discussed below under the appeal process. Relating to inspection and enforcement activities, consideration should be given to requiring a worker representative to attend the inspection closing conference. Consideration should also be given to providing some sort of worker participation in the variance review process.	<ul style="list-style-type: none"> • The Division's policy has been amended to provide worker participation at the closing conference of every inspection. • Clarification of regulations will drastically reduce the requests for variance. The Board of Governors has approved a policy that provides for worker participation in variance and sanction processes. 	<p>Complete</p> <p>1994</p>

REPORTER

Assessments' Response to the Administrative Inventory

Date: January 7, 1994

Foreword

The Administrative Inventory model primarily describes a system at a point in time. The external investigators, recognized experts in their respective fields, produced a description based on interviews with staff, workers, and stakeholders in the community. Their description includes commentary and measurement intended to provide a baseline against which changes in the system can be measured.

The investigators concluded the inventory with "Attention Points." These describe aspects of the system that are worthy of note and further action or attention by the organization. The Attention Points contain alternatives and suggestions based on the collective expertise of the investigators.

In order for the Board to act on and be accountable to these reports, the president and C.E.O. committed to an annual follow-up response to the Administrative Inventories.

Mission Statement

Workplace safety and health is our challenge

*Quality rehabilitation and fair compensation
is our commitment*

World leadership is our goal

– Workers' Compensation Board

Assessment Department Mission Statement

Assessments exists primarily to serve the employer and worker communities in funding the workers' compensation system. The Assessment function will be client-centred and will combine the highest standards of integrity and equity with effective delivery of services and programs.

Introduction

The Administrative Inventory of Assessments was completed in 1992 after extensive interviews with staff, employers, employer representatives, labour representatives and others. It also included a review of statistical and other documentary information.

The Inventory identified a number of Attention Points which the author concluded were deserving of further review and action. Assessments concurs with the need to address these points.

The overall theme of the Attention Points is that we need to become more client-oriented in carrying out our business function and we need to be more proactive with our employer constituency. Our staff and the author have also expressed criticism of our low staffing levels over the years and have linked this with service issues.

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.1	Pages 61-62	<p>Public Disclosure</p> <p>The W.C.B. needs to find a way to make more information about assessments available. Understanding the sensitivity of some of the information gathered by the Assessment Department, the new spirit of openness at the W.C.B. is belied by employers' perceptions that even information about their own account is not available to them. Since this is not W.C.B. policy, it must be attributed more to attitude than to practice, but it remains a primary challenge for the W.C.B. and for the Assessment Department.</p> <p>Given the current situation and the recent history, it would seem feasible to provide a mechanism for making information about classifications of individual firms public. The firms expressing an opinion about this to the author all thought it was a good idea. No employer representatives expressed concern about possible release of confidential information. The W.C.B. should find a way to do this as soon as possible and not wait for the implementation of the <i>Freedom of Information Act</i>.</p> <p>On the positive side the recent institution of public briefings on assessment matters by high level W.C.B. officers is commendable and well received. Some of the information presented is difficult to comprehend, but it is vitally important that the W.C.B. and the Assessment Department make the effort. Nothing is so important to the ultimate public perception of the Department as the willingness to explain W.C.B. policies, methods, and procedures.</p>	<p>An amendment to Assessment Policy on Disclosure was approved by the governors and implemented in June 1993.</p> <p>The Department is also in compliance with the <i>Freedom of Information and Protection of Privacy Act</i>.</p> <p>Public forums centred around assessment rates continue to expand and in 1993 were held in Richmond, Nanaimo, Victoria, Cranbrook, Kelowna, Prince George and Chilliwack.</p>	<p>June 1993</p> <p>October 1993</p> <p>Ongoing</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.1	Page 62	<p>Classification Problems</p> <p>Unfortunately there are no data available with which to estimate the error rate in classification decisions. A few "horror stories" go a long way toward shaking credibility in W.C.B. decision-making and/or W.C.B. motivation to correct its errors. The author heard such horror stories from several reliable employer sources, so the perception is there and the issue must be addressed.</p> <p>It should also be acknowledged that the competitive business world of today is very turbulent, and a classification that is correct today may no longer be correct tomorrow, due to changes in product mix or the way of doing business. Making employer classifications public, as recommended above, could provide a powerful demonstration that the W.C.B. is prepared to justify its decisions. Undoubtedly, the public disclosure of assessment classifications will release a pent-up demand for review in those cases where firms perceive that competitors are classified differently from themselves. This burden must be met in the interest of equity, even if it does not seem efficient to do so.</p>	<p>Making classifications public was included with the change to the Disclosure Policy.</p>	<p>June 1993</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.2	Page 62	<p>Classification Problems</p> <p>To provide a firm foundation for classification policy, a review of the adequacy of the current classification system is needed. There has been no public consideration of the appropriateness of the entire classification system in British Columbia for many years. Such a study is needed to further enhance the public credibility of the assessment system. While it is true that changing the classification system will not increase W.C.B. revenues and a review of the classification system will take a good deal of energy, the payoff will come in the form of increased employer satisfaction and greater perceived equity among employer groups.</p>	Action on this point is scheduled for 1995.	1995/96
3.1	Pages 62-63	<p>Client Satisfaction Measures</p> <p>The W.C.B. needs to gather systematic reliable feedback on its performance from client groups, both employees and employers. Further, in the case of the Assessment Department, this must be done in a way that does not threaten the firm with the possibility of retaliation for giving a forthright answer. A randomized, anonymous survey would provide more adequate measurement than the current telephone follow-up efforts, which leave respondent firms open to the fear of retaliation. An even better possibility would be to conduct such efforts through an outside survey contractor, with strict pledges of confidentiality for respondent employers.</p>	An internal system will be developed in 1994 to track employer complaints, classify them and to begin to analyze the problem areas.	

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.2	Page 63	<p>Client Satisfaction Measures</p> <p>Equally important, the Assessment Department needs to acknowledge that the reaction of clients is an important way to measure their output. This does not mean that it is possible to please all employers with their assessments all the time, but it does recognize that employers should be given an effective voice in determining how they will be treated by the W.C.B. Assessment Department. Following such a strategy in the past would have helped prevent the current situation of distrust and alienation.</p>	<p>Assessments acknowledges the need to measure its success by client reaction. Assessments supports and actively participates in the public consultation process recently developed by the Board.</p>	Ongoing
4.1	Page 63	<p>Staff Development Efforts</p> <p>The W.C.B. Assessment Department has a fine complement of staff, who are highly motivated to do a good job. But often, they feel that they do not have the proper preparation or training to do an optimal job. The management of the Department realizes it too, as evidenced in the addition of a manager of training in 1991. However, the needs are very great, and the resources available are still meager, especially when the manager of training is also working on the customer service initiatives for the Assessment Department. Staff are impatient for results from the training effort, and some question whether there is any real commitment to staff development. The Assessment Department desperately needs more adequate staff development if it is to meet the challenge of increased public disclosure and public review of its practices and procedures.</p>	<p>Staff development and training plans will be completed by July 31, 1994.</p>	

Point	Cross-reference	Text Attention Point	Action	Completion Date
5.1	Pages 63-64	<p>Staffing Levels</p> <p>Assessment Department leadership has run a very lean operation over the years when it came to staffing. This was demonstrated in the fact that there have been no staff increases in a decade, despite substantial increases in the workload. It is clear that staffing shortages have hurt Assessment Department performance in the last few years in the perceived equity area, as detailed above. It also seems to this observer that staff shortages have even hurt efficiency in the Assessment Department. It is probable that additional resources devoted to audit and collection activities could provide much of the revenue needed to pay for modest increases in staffing. Department leadership did propose such increases in the 1992 budget submission requesting the addition of nine staff, but the requests were not approved.</p> <p>But it is clear that the Assessment Department cannot meet the legitimate public expectations of its performance without additional staffing. Staff increases will be the price of operating the Assessment Department in accordance with the new spirit of openness at the W.C.B. It simply will take more people to do things in an open, responsive manner than it did in the past to conduct business behind closed doors. Thus, it is up to the employer-clients to understand that it will also be necessary to pay for a more responsive Assessment Department.</p>	<p>A critical review of performance effectiveness of the department will be completed by June 30, 1994. Appropriate recommendations for staffing increases or decreases will be made in conjunction with the 1995 budget.</p>	

Point	Cross-reference	Text Attention Point	Action	Completion Date
6.1	Page 64	<p>E.R.A. Program</p> <p>It is this author's opinion that the current W.C.B. Experience Rated Assessment (E.R.A.) Program does help to focus additional employer attention on safety and injury prevention, without unduly compromising the principle of collective liability. It is conceded that the E.R.A. Program does produce employer "interest" in claims, and that inappropriate claims avoidance behaviors by employers can defeat the goal of fair and effective compensation for injured workers under the <i>Act</i>. A carefully designed, definitive study should be pursued by the W.C.B. to determine the actual impacts of the E.R.A. Program.</p> <p>In the meantime, there may be a number of areas where E.R.A. safety-enhancing performance could be immediately improved. First, it would be desirable to provide greater linkage between O.S.H. inspections and penalty assessments and E.R.A. merits and demerits. It is unfortunate that this opportunity to use financial incentives to reinforce safety performance incentives was missed in the original design of the E.R.A. Program. The W.C.B. of British Columbia is in a perfect position to experiment with such linkages. If the W.C.B. decides to address this possibility, it would be an excellent opportunity to provide input from both employer and employee groups as to the appropriate incentives needed to encourage socially desirable behavior in this vitally important area. The Regulatory Advisory Committee (R.A.C.) process provides a good model for such a public review.</p>	<p>We understand the Internal Audit Department will be conducting a review of the program in 1994 which will be a first step in an overall review, which is targeted for completion in 1995.</p>	

Point	Cross-reference	Text Attention Point	Action	Completion Date
6.2	Page 64	<p>E.R.A. Program</p> <p>Second, many employers feel that the maximum merits and demerits (one-third variation in each direction) are not sufficient to distinguish among all levels of firm performance. No information was available to us on the distribution of E.R.A. merits/demerits by sub-class. However, a careful empirical study of movements in merits/demerits and O.S.H. inspection results should reveal whether employers are behaving as if they find sufficient incentives in the current system to motivate their behavior.</p>	<p>This will be included in the internal audit program review in 1994.</p>	
6.3	Pages 64-65	<p>E.R.A. Program</p> <p>The problem of excessive annual swings in merits/demerits can be dealt with more simply. The W.C.B. could impose an annual swing limit on the E.R.A. merit/demerit, or perhaps on the final assessment rate itself, so that it responds more slowly to wide swings in claims activity. Imposing a maximum annual swing of 20 percent would mean that it would take five years for an employer to go from maximum merit to maximum demerit, or vice versa, as is currently true in amortizing sub-class surpluses or deficits. This concept should also be reviewed from both equity and efficiency perspectives. An alternative would be to limit the dollar size of a single claim, so as to prevent a single large claim from overwhelming an otherwise sound performance. Alberta has followed this strategy to dampen annual swings for small employers.</p>	<p>The Internal Audit Department will be conducting a review of the program in 1994 which will be a first step in an overall review.</p>	

Point	Cross-reference	Text Attention Point	Action	Completion Date
6.4	Page 65	<p>E.R.A. Program</p> <p>In addition, employer representatives maintain that there are whole industries where everyone is at maximum merit or demerit, because of inappropriate sub-class construction. This is the inescapable consequence of a sub-class structure that includes a limited number of classifications to accommodate hundreds of different industries. These problems could also be addressed through a review and public discussion of the W.C.B. classification system, as recommended above. The outcome should provide greater perceived equity and stakeholder commitment to the W.C.B. assessment system.</p>	<p>An overall classification review is planned for 1995/1996.</p>	
7.1	Page 65	<p>Personal Optional Protection</p> <p>The Personal Optional Protection (P.O.P.) Program seems to require more than its share of W.C.B. resources. This is an inevitable result of the fact that there are certain fixed costs associated with establishing and maintaining a W.C.B. account, regardless of the number of people employed. The Registration and Collection Sections of the Assessment Department seem to be particularly burdened by the turnover among P.O.P. accounts. This is frustrating to W.C.B. staff, but it may not pose a significant policy problem. If policy makers want to keep W.C.B. registration readily available (requiring no down payment for coverage for example), the only issue is whether they are aware of the actual cost of such a policy. The W.C.B. could determine the approximate cost of administering different types and sizes of accounts to help determine whether the cost of the current easy access policy is excessive.</p>	<p>A report on P.O.P. which included administrative costs was sent to the Board of Governors on June 21, 1993.</p> <p>As well, the P.O.P. form was redesigned on a "plain language" basis in 1993 for implementation in 1994.</p>	<p>June 1993</p> <p>1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
8.1	Pages 65-66	<p>Appeal Avenues for Employers</p> <p>Employer groups feel that it is unfair that they have only one effective level of appeal from W.C.B. Assessment Department decisions, the Appeal Division of the W.C.B. Some even suggested that employers should be allowed to appeal assessment matters to the Workers' Compensation Review Board for adjudication outside of the W.C.B. However, it is premature to conclude that the new appeal structure introduced by Bill 27 will not provide a sufficient review function to alleviate employer concerns. Indications from the first year of activity are very encouraging. It seems more sensible at this point to provide a more credible initial review in the Assessment Department, one that employers would perceive as fair-minded and well-reasoned.</p> <p>Such an effort, combined with improved information disclosure, and the more open and responsive procedures discussed above, should obviate the need for more formal employer appeals, except on significant policy issues. The example of the transfer of experience rating merits/demerits provides a good example of the way in which mistrust of the Assessment Department and misunderstanding of W.C.B. policy led to widespread employer resentment. The recent Appeal Division decision that W.C.B. policy was in violation of the <i>Act</i> should come as a great relief to employer interests. Thorough, consistently reasoned decisions from the Appeal Division and more attention to client perceptions by the Assessment Department should make a major contribution to reducing the perceived need for additional avenues of employer appeal.</p>	Legislative training sessions for staff began in 1993 with the aim of providing the basis for decision making. Also, a course on "written power" and "decision letters" began in 1993 and will conclude in 1994. All staff corresponding with our constituents will go through both courses.	Ongoing

REPORTER

Compensation Services Division's Response to the Administrative Inventory

Date: April 11, 1994

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1. The Agency

Point	Cross-reference	Text Attention Point	Action	Completion Date										
1.1	Page 143	<p>Growth in Staffing</p> <p>Between 1985 and 1990, total staff increased by 46.2 percent. From 1987 to 1990, staff growth exceeded 26 percent. Apparently, substantial growth has continued in 1991. Hand in hand with the growth in staffing has been the rapid growth in administrative costs of the W.C.B. Special attention should be given to monitoring growth in staffing and rising administrative costs. Substantial expansion, even if justified by growth in claims activity, places an inordinate burden on the agency to train and productively integrate new personnel.</p>	<p>Compensation Services Staff</p> <table> <thead> <tr> <th><u>1990</u></th> <th><u>1991</u></th> <th><u>1992</u></th> <th><u>1993</u></th> <th><u>% Δ</u></th> </tr> </thead> <tbody> <tr> <td>747</td> <td>837</td> <td>868</td> <td>901</td> <td>20.6%</td> </tr> </tbody> </table> <ul style="list-style-type: none"> - The brakes have been put on the growth. - Overall strategy is to get out of work of low value and reallocate resources to more complex higher value work (case management). • Have M.S.P. process medical accounts. • Don't set up files for Health Care Only claims; only record data. • Allocate resources to Client Centred Service Delivery. 	<u>1990</u>	<u>1991</u>	<u>1992</u>	<u>1993</u>	<u>% Δ</u>	747	837	868	901	20.6%	<p>1994</p> <p>1995</p> <p>1995</p> <p>1995</p>
<u>1990</u>	<u>1991</u>	<u>1992</u>	<u>1993</u>	<u>% Δ</u>										
747	837	868	901	20.6%										

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.2	Page 144	<p>Managerial Turnover</p> <p>Concern has been expressed about the excessive managerial turnover in the Division. From the perspective of line staff, concerns were raised about standards of performance constantly changing. There is also the perception that staff and managers are at risk for speaking their minds, that personnel decisions seem capricious, and that the quality of the agency suffers.</p>	<ul style="list-style-type: none"> • In September 1993 the Division was reorganized from a functional to service oriented structure with new management roles reflective of this change. As part of this reorganization, client service managers were selected and other managers were re-assigned to duties that better suited their skill sets. • The management structure continues to be adjusted on the basis of matching assignments to the aptitudes and interests of the managers. To this end each manager underwent an individual assessment of their management capabilities. This assessment, along with a management training program, were initiated in 1993 to help reduce managerial turnover. 	<p>Completed</p> <p>Ongoing</p>
1.3	Page 144	<p>Planning</p> <p>Long-term planning should be a significant management tool at the division level and below. The process can lead to the creation of operational standards, the measurement and periodic assessment of goals, and the reallocation of resources within the agency.</p>	<p>The Divisional strategy flows from the Transition Project and the original Administrative Inventory. A reallocation of resources from low value activities to the more complex cases will improve service to injured workers and have a positive impact on benefit costs once fully implemented.</p>	<p>Ongoing</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.4	Page 145	<p>Research and Evaluation</p> <p>The W.C.B. continually assembles data for use as management information tools. Management information systems are no alternative or substitute for program evaluation. Program evaluation represents a commitment to analyze programs or elements of programs in order to understand if and how they work. It is recommended that a research and evaluation unit be created in the near future. An adequate research and evaluation unit at the W.C.B. would add significantly to institutional capability and sense of direction.</p>	<ul style="list-style-type: none"> • The Executive Committee has created a Program Evaluation Unit under the direction of the Internal Audit and Evaluation Department. • The first program evaluation was conducted in the Vocational Rehabilitation area. The report is to be completed in mid 1994. 	Completed
1.5	Page 146	<p>Training</p> <p>It is obvious that the W.C.B. as a whole has not given sufficient energy to the training needs of existing staff. One particularly obvious area is in the Vocational Rehabilitation Services Department, where the vocational rehabilitation consultants have had very different types of training and skill backgrounds prior to their employment at the W.C.B. An internal staff development program could help to minimize these differences. By devoting resources to staff development, the W.C.B. will enable its employees to maintain and upgrade their skills. The W.C.B. should consider developing and utilizing resources in the community that can assist with staff development as well as expanding its internal commitment to this critical area.</p>	<ul style="list-style-type: none"> • The Training and Education Centre (T.E.C.) unit was created in 1992 to provide technical training to all positions in Compensation Services. Updating and backup training is conducted by this unit. • The Vocational Rehab formal training for new consultants is now 12 weeks. One vocational rehabilitation consultant is assigned full time to the T.E.C. unit to provide training and develop training materials. 	Completed

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.6	Page 147	<p>Management Information</p> <p>The Information Services Division's management information system is an excellent information service for the W.C.B. What the system hasn't done is provide access to that database in a useful, user-friendly manner. Greater attention should be paid to getting the information that is already being collected into the hands of managers and others so that it can be utilized in a timely manner.</p>	<ul style="list-style-type: none"> • Throughout the Transition Project much work has gone into analysis of data to provide performance measures. • The next step is to implement the high priority performance measures. • The corporate Executive Information System (E.I.S.) has been used to determine appropriate performance measures. 	<p>December 1993</p> <p>1994</p> <p>1994</p>
1.7	Page 147	<p>Matrix Management</p> <p>W.C.B.'s matrix management approach may warrant rethinking. W.C.B. should carefully examine its existing approach to unit management to assure itself that no better means could be applied, particularly if a move to greater decentralization develops.</p>	<ul style="list-style-type: none"> • In September 1993 the Division was reorganized from a functional to a service orientation. • The vocational rehabilitation consultants and the administrative support managers now report to the client service managers. 	<p>Completed</p> <p>Completed</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
1.8	Page 147	<p>Decentralization</p> <p>Many of the reasons for centralization may no longer apply with the technology that the W.C.B. has or could easily acquire. The inventory supports the move towards decentralization in the lower mainland. However, the Board could minimize the risks of going to a much more decentralized system by experimenting with the approach and reserving judgment on the overall strategy until the experiment is evaluated.</p>	<ul style="list-style-type: none"> • In November 1993, the Lower Mainland claim units were reorganized into seven service delivery locations. This will improve the interaction between employer, workers, unions and the Board. • Changes are being made to the front-end processing of claims which will have an impact on what would be decentralized. • The Division still has decentralization as a priority. 	<p>Completed</p> <p>1994</p> <p>Ongoing</p>
1.9	Page 147	<p>Occupational Safety and Health</p> <p>The W.C.B. has not created the potential synergy between injury prevention programs and injury rehabilitation and compensation programs. A conscious effort by the W.C.B.'s management to achieve some of the potential alliance of these functions is a goal that should be endorsed by the agency.</p>	<ul style="list-style-type: none"> • The vice-presidents of Prevention and Compensation Services have made this a priority. • There is a joint project between Compensation Services and Prevention to jointly develop an Employer's Report of Injury form that would capture statistical information needed for both Divisions. 	<p>Ongoing</p> <p>1994</p>

2. The Claims Process

Point	Cross-reference	Text Attention Point	Action	Completion Date
2.1	Page 149	<p>Workload</p> <p>There are many challenging and stressful jobs in the agency such as the W.C.B., but few compare with that of the claims adjudicator. Many claims adjudicators have what may be considered excessive workloads. Excessive workloads result in payment errors and lead to complaints that adjudicators are difficult to reach by telephone, or do not return calls promptly, that they seem abrupt when they are contacted, or that their letters are cryptic or curt. All of these problems are byproducts of a system that assigned too many claims — both new and old — to the adjudicators, the primary decision maker in the entire system.</p>	<p>The geographic realignment and move to initial and ongoing responsibilities at the end of 1993 have put an increased pressure on caseloads during the transition period. Analysis of data and the implementation of performance measures will assist in determining the appropriate staffing levels. The working environment continues to change with increased involvement of the employers, 39(1)(e) Relief of Costs requests and F.I.P.P. requirements.</p>	Ongoing
2.2	Page 149	<p>Paylag and Criteria of Performance</p> <p>There are few objective standards of performance applied to the claims units. One that is most often used is paylag. Paylag, unfortunately, may not be an appropriate standard in isolation. Additional criteria for evaluation are needed. The development of additional performance measures that incorporate a broader range of institutional goals is encouraged.</p>	<ul style="list-style-type: none"> • The Division has identified four critical success factors: Client Satisfaction, Quality, Timeliness, and Cost Effectiveness. • Paylag is a measure of timeliness and applicable to short-term claims. • Other measures are currently being tested and evaluated. 	<p>Completed</p> <p>1994</p>

3. Dispute Resolution

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.1	Page 151	<p>Appeals</p> <p>The Workers' Compensation System implicitly encourages appeals. Given the correlation between the level of appeals and rising administrative costs, more attention should be paid to appeals as a symptom of ineffective or insufficient adjudication or communication with the client at an earlier level.</p>	<ul style="list-style-type: none"> Review Board findings are tracked as they return to the Board, however we have not analyzed the returns for the purposes identified. The chief appeal commissioner files an <i>Annual Report</i> with the governors. 	Ongoing
3.2	Page 151	<p>Evaluation of the W.C.R.B.</p> <p>For a tribunal of such significance, no outside, independent performance evaluation of the Workers' Compensation Review Board has been made or is contemplated. The appeal body should have its decisions reviewed for consistency and timeliness. Any public program of this magnitude warrants periodic and independent evaluation of its performance to assure it is operating with fairness, and with efficiency in compliance with its charge.</p>	<ul style="list-style-type: none"> This Attention Point is outside the purview of the Compensation Services Division. 	N/A

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.3	Page 152	<p>W.C.B.–W.C.R.B. Relations</p> <p>With the recent changes in the direction and structure of the W.C.B., greater cooperation and understanding between W.C.B. and the W.C.R.B. may be possible. It is urgently needed to assure that the best feasible job of adjudication is done on a timely, cost-effective basis.</p>	<ul style="list-style-type: none"> • To ensure that front-line adjudicators are aware of trends and issues raised by the Review Board, key Review Board findings are circulated to staff by the Training and Education Department. • Review Board findings are tracked and analyzed by the Division. • Different representatives from the Division have met with personnel from the Review Board to discuss issues of mutual interest and as a result communication is improving. • The newly created Service Effectiveness Department is in the process of developing service standards and performance targets. 	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
3.4	Page 152	<p>Manager Reviews</p> <p>If the W.C.B. decides to decentralize its claims processing facilities in the lower mainland area, the manager review function should devolve to the local office rather than being retained in Richmond. While there may be some loss in consistency for offices, the improvement in management effectiveness and “natural justice” for clients seem worth the tradeoff. There is a continued role for the Policy and Review Office in reviewing and codifying these decisions for the <i>Rehabilitation Services and Claims Manual</i> when required.</p>	<ul style="list-style-type: none"> • In 1992 — 1,809 Manager Reviews were completed with 19% being modified or overturned. • In 1993 — 2,618 Manager Reviews were completed across the Division with 22% being modified or overturned. 	<p>Ongoing</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.5	Page 153	<p>Reducing the Number of Medical Review Panels</p> <p>It may be possible to reduce the instances in which the Medical Review Panel is needed. <i>Bona fide</i> medical disputes have arisen when medical issues have been decided based on a review of a file only. If a medical advisor had actually examined the claimant or discussed the issue with the treating physician, some disputes would not have arisen, or at least would not have continued to the M.R.P. If disputes can be eliminated in this way, those cases would be resolved more quickly and without the expense of a panel.</p>	<ul style="list-style-type: none"> • The Compensation Services' response to Dr. Leonard Jenkins' 1992 Medical Review Panel Report made a recommendation for a procedural change to reduce the number of M.R.P. appeals. The response recommended that all medical investigations are conducted to resolve any differences in medical opinion. Additionally, a review mechanism was proposed whereby the manager, in conjunction with the medical advisor, would review all potential M.R.P. appeals to determine whether an examination by a Board medical advisor or Board specialist would be beneficial in resolving the dispute without an M.R.P. appeal. These recommendations along with other policy and procedural changes are going for public consultation in May 1994. • It is anticipated that these measures will reduce the number of appeals to the M.R.P., however, the majority of all appeals to the M.R.P. originate following appellate decisions or referrals from the Appeal Division under Section 58(5). 	<p>Ongoing</p> <p>Ongoing</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
3.6	Page 153	<p>Lawyers</p> <p>The significant challenge for the W.C.B. is to provide a fair and equitable system where lawyers are not needed to represent the interests of the parties involved. Worker advocates assert that there is insufficient qualified representatives available to injured workers. The W.C.B. or the ombudsman may wish to monitor this situation to determine if the system is undergoing significant change in that regard.</p>	<p>In the majority of cases, non-legal advocates are involved in the appeal processes.</p>	<p>Ongoing</p>

4. Benefits

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.1	Page 154	<p>Generous But Complex</p> <p>Benefits to injured workers and their dependants tend to be relatively generous in British Columbia. The existing degree of complexity may not itself warrant change, but in considering any future alterations of benefits, the issue of simplicity should be kept in mind.</p>	<p>This principle receives some form of consideration in all policy revisions prior to going to the governors.</p>	Ongoing
4.2	Page 155	<p>Income Continuity Benefits</p> <p>A problem of income maintenance may exist for workers in the time period between the ending of temporary disability benefit payments and the establishment of the permanent partial disability pension. The use of continuity benefits, such as unemployment insurance, union benefits or welfare, needs to be assessed and possibly revised. Even after that is done the W.C.B. should give attention to shortening the time gap between cessation of temporary benefits and the beginning of permanent disability benefits. This would be abetted by encouraging earlier intervention of the vocational rehabilitation consultant in cases that involve significant risks of continuing wage-loss after recovery.</p>	<ul style="list-style-type: none"> • Preliminary work has been initiated on the current W.C.B. income continuity benefits policy. Further analysis is required. • An Action Plan is currently being implemented in Disability Awards to reduce the time period between cessation of temporary benefits and the beginning of permanent disability benefits from an average of 12 months to 9 months. 	<p>1994</p> <p>1994</p>

Point	Cross-reference	Text Attention Point	Action	Completion Date
4.3	Page 156	<p>Earnings-Loss Pensions</p> <p>It is generally agreed in workers' compensation circles that, typically, the major disability cases are undercompensated and the minor disability cases are overcompensated, relative to lifetime earnings losses. Unfortunately it is impossible to make any definitive statements about the equity of compensation in British Columbia without a full study.</p> <p>The W.C.B. should launch a study to determine whether similar disabilities are being compensated in a consistent manner and whether different levels of disability are being compensated appropriately.</p>	<p>The preliminary work for this study is currently under way in the Policy and Research Department. A paper is expected to be released in the fall of 1994.</p>	<p>Fall 1994</p>

5. Rehabilitation

Point	Cross-reference	Text Attention Point	Action	Completion Date
5.1	Page 157	<p>Organizational Structure at the Service Centres</p> <p>Attention needs to be given to the role of the vocational rehabilitation consultant and the level of management support (e.g., clinical supervision, ongoing training) provided to these individuals. Consideration should be given to the establishment of a lead consultant or supervisory position within each unit to provide more direct professional supervision and ongoing training for consultants. The role of the manager also needs to be reviewed with the goal of separating the technical responsibilities from the management responsibilities.</p>	<ul style="list-style-type: none"> • The vocational rehabilitation consultants now report to the client service manager (C.S.M.) of the Service Delivery Location (S.D.L.) to which they are assigned. • Technical support is being currently provided across S.D.L.'s by former vocational rehabilitation managers. • We are currently working through the transition and C.S.M.'s have received an orientation to Vocational Rehabilitation. 	December 1994
5.2	Page 157	<p>Goals and Expectations</p> <p>There needs to be some clarification of the operational goals of the vocational rehabilitation process at the W.C.B. The role of the vocational rehabilitation consultant should be better defined, performance expectations made more explicit, and measurement, and accountability enhanced.</p>	<ul style="list-style-type: none"> • The focus of Vocational Rehabilitation is on "return to work." • Employment vs. employability is outcome target for the consultants. • More work is required to establish priorities and define performance expectations. 	Ongoing

Point	Cross-reference	Text Attention Point	Action	Completion Date
5.3	Page 158	<p>Early Intervention</p> <p>There is a desire at the Rehabilitation Centre to involve the consultant at a much earlier stage of the medical rehabilitation process as part of a coordinated team approach to service provision. The W.C.B. should explore possible service delivery options throughout its operations to enhance early intervention efforts through team approaches.</p>	<ul style="list-style-type: none"> • The Rehabilitation Centre is currently going through an accreditation process with early intervention initiatives as an integral part of its overall strategy. 	1994
5.4	Page 158	<p>Job Search Services</p> <p>Expanding the Job Search Program and widening its services are needed. The W.C.B. should consider lengthening the program to allow for more worker contact and in-depth assistance, a re-introduction of certain aspects of the Azerin Job Club model, providing more follow-up and better or alternative service options for the area offices, as well as programmatic expansion to provide a full range of services.</p>	<ul style="list-style-type: none"> • A plan has been developed to create an Employment Resource Centre. • This initiative requires the endorsement and prioritization of the Divisional Management. • As an interim measure the current Job Search Program has been reworked and substantially expanded to include more career re-direction and skills training, as well as to more appropriately focus on the disabled population. 	1995
5.5	Page 158	<p>Access to Services in Area Offices</p> <p>The range of rehabilitation services available in the area offices is more limited than those existing in Richmond. The differential impact of these limitations should be assessed so that possible adjustments can be weighted and considered.</p>	<ul style="list-style-type: none"> • The budget limits have been revised; increasing the vocational consultant's authority to \$10,000. This provides an increased level of decision making at the local level. 	Ongoing

6. Funding

Point	Cross-reference	Text Attention Point	Action	Completion Date
6.0	Page 159	<p>If the W.C.B. wishes to determine the pattern of its rehabilitation expenditures on a cost-effectiveness basis, it follows that more studies and ongoing program evaluation will be required to identify what is cost effective for the organization, and the injured workers it serves.</p>	<p>Vocational Rehabilitation costs have increased from \$12 million in 1990 to \$46 million in 1993. The Program Evaluation currently under way will provide some insight as to the cost effectiveness of this service. However, this is really only the beginning.</p>	1994

7. Staff Morale

Point	Cross-reference	Text Attention Point	Action	Completion Date
7.0	Page 159	<p>The administrative inventory noted a low level of staff morale at the W.C.B. The inventory recommended numerous ways to nurture staff including providing opportunities for staff development, and avenues for upward mobility within the agency. Another important goal is to build a more cooperative relationship with the union, one based on mutual trust and respect.</p>	<p>There remains a low level of morale at the W.C.B. The Executive Committee, with its new team members, will have this as a major challenge to address.</p>	1994

Table 8.1 — British Columbia Economic Indicators, 1982–1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
Average Employment in B.C. (000)	1,202	1,190	1,191	1,220	1,270	1,306	1,358	1,435	1,469	1,488	1,517
Unemployment Rate in B.C.	12.1%	13.8%	14.7%	14.2%	12.6%	12.0%	10.3%	9.1%	8.3%	9.9%	10.4%
Average Weekly Earnings	\$397.17	\$425.40	\$429.69	\$441.56	\$444.02	\$453.42	\$446.52	\$491.63	\$515.91	\$543.36	\$549.03

SOURCE: Statistics Canada

NOTES:

Average employment — Statistics Canada

Unemployment rate — Statistics Canada

Average weekly earnings — Statistics Canada

Information can also be obtained from W.C.B. Statistical Services

Table 8.1

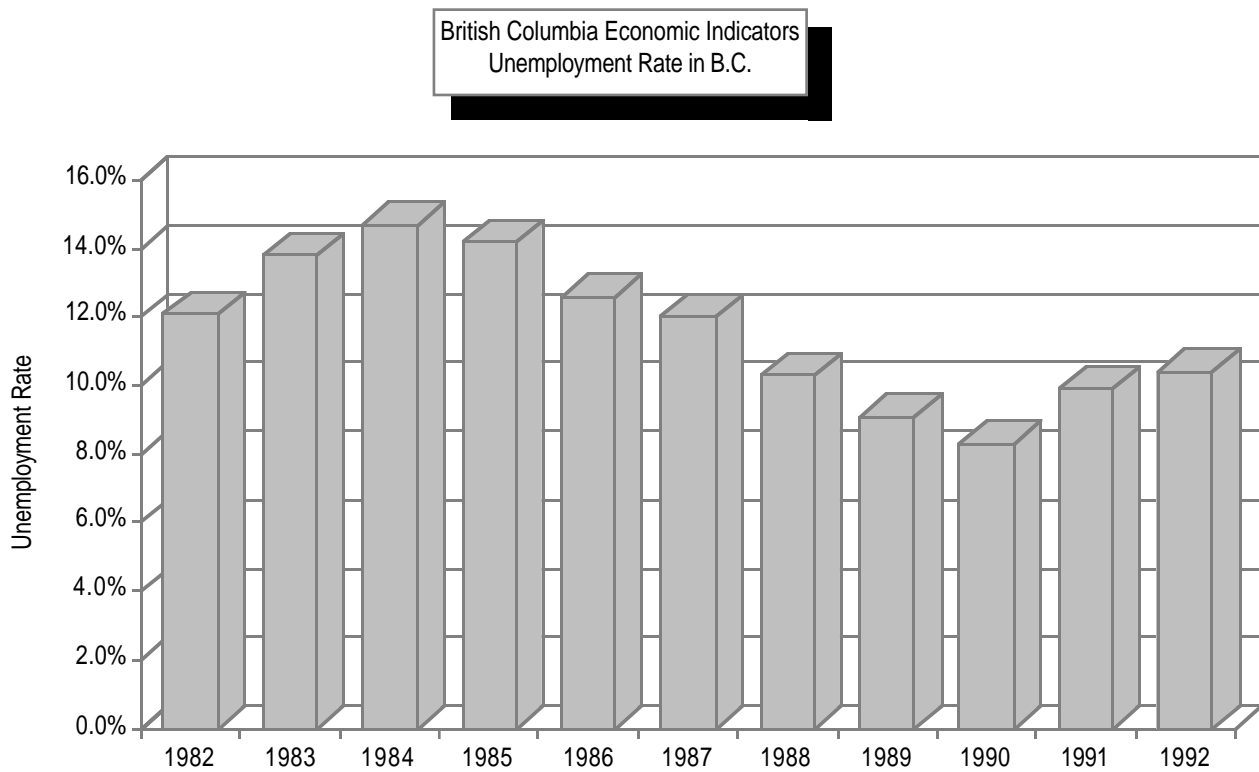
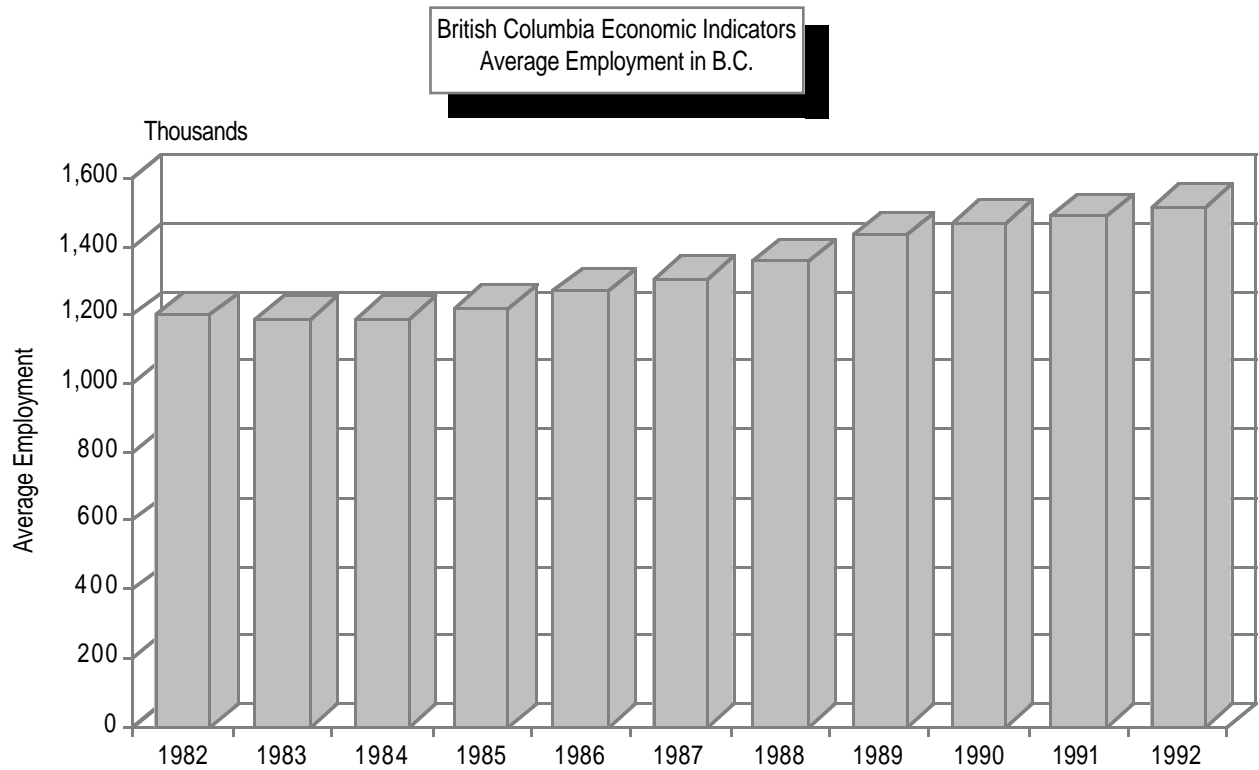


Table 8.1

British Columbia Economic Indicators
Average Weekly Earnings

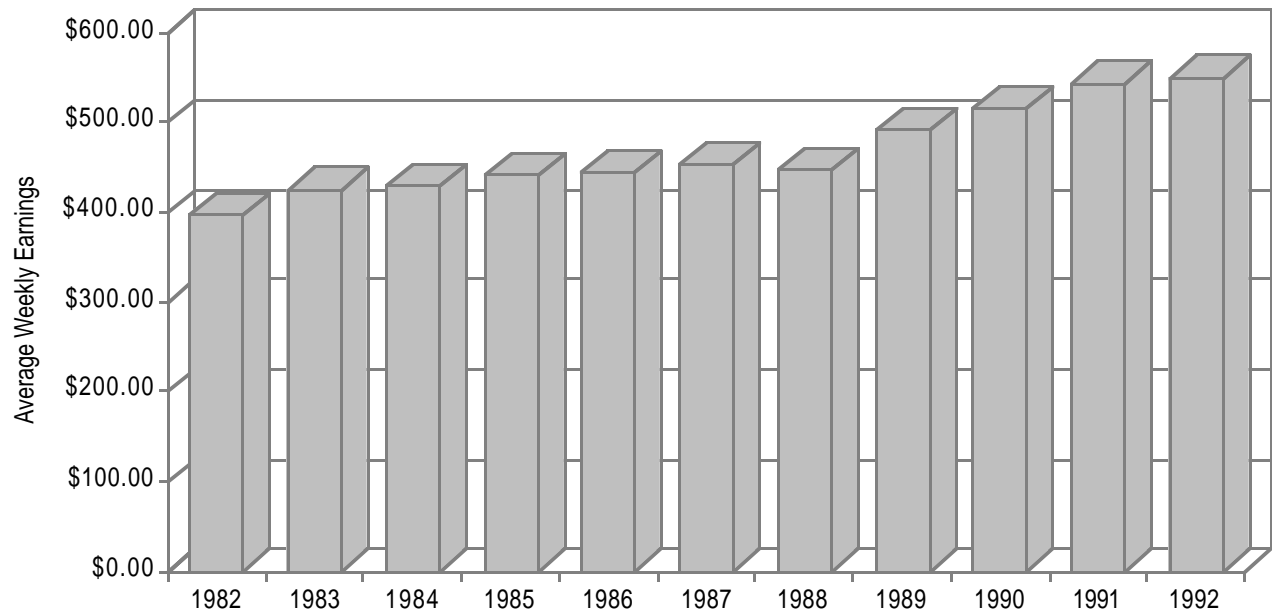


Table 8.2 — W.C.B. Claims Volume, 1982–1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
New Claims Registered	159,739	151,815	150,919	158,673	156,312	169,059	192,515	207,019	217,152	203,740	197,793
Per 100 Workers	13.3	12.8	12.7	13.0	12.3	12.9	14.2	14.4	14.8	13.7	13.0
S.T.D. + L.T.D. First Paid	70,079	63,143	59,910	61,926	62,946	66,729	74,653	80,871	86,979	81,095	80,857
Fatal Claims First Paid	176	148	134	126	120	140	162	175	168	141	146
Time-Loss Claims First Paid	70,255	63,291	60,044	62,052	63,066	66,869	74,815	81,046	87,147	81,236	81,003
Per 100 Workers	5.8	5.3	5.0	5.1	5.0	5.1	5.5	5.6	5.9	5.5	5.3
Health Care Benefit Claims First Paid	62,886	56,413	55,314	57,880	57,630	59,610	72,703	72,499	78,760	68,614	66,510
Per 100 Workers	5.2	4.7	4.6	4.7	4.5	4.6	5.4	5.1	5.4	4.6	4.4

SOURCE: Workers' Compensation Board, 1982–1992 annual reports

New claims registered = New claims count (report from Compensation Services)

S.T.D. = Short-term disability

L.T.D. = Long-term disability

Time-loss claims first paid = S.T.D. claims + L.T.D. claims (from 1982–1992 annual reports)

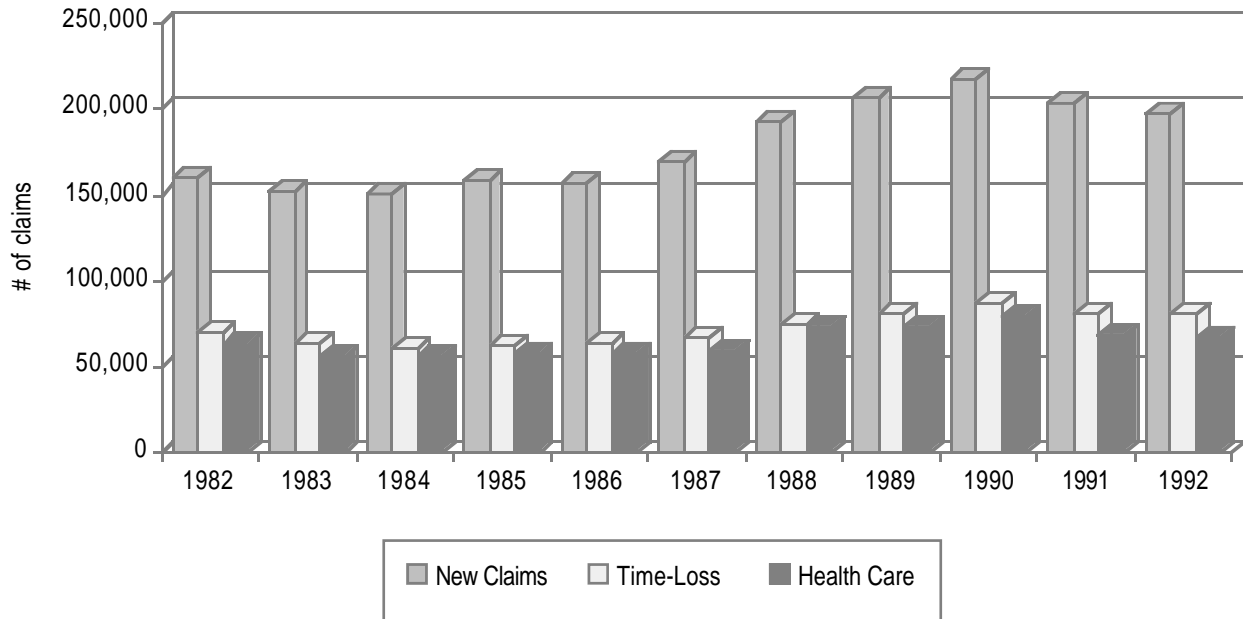
Fatal claims = fatal claims adjudicated (1982–1992 annual reports)

Health care benefits = H.C.B. first paid (1982–1992 annual reports)

Number of workers = average employment in B.C. (*Workers' Compensation in British Columbia: An Administrative Inventory at a Time of Transition, 1991, Table 8.1*)

Table 8.2

W.C.B. Claims Volume, 1982-1992
New Claims Registered &
Time-Loss Claims First Paid



W.C.B. Claims Volume, 1982-1992
New Claims Registered & Time-Loss Claims First Paid
Per 100 Workers

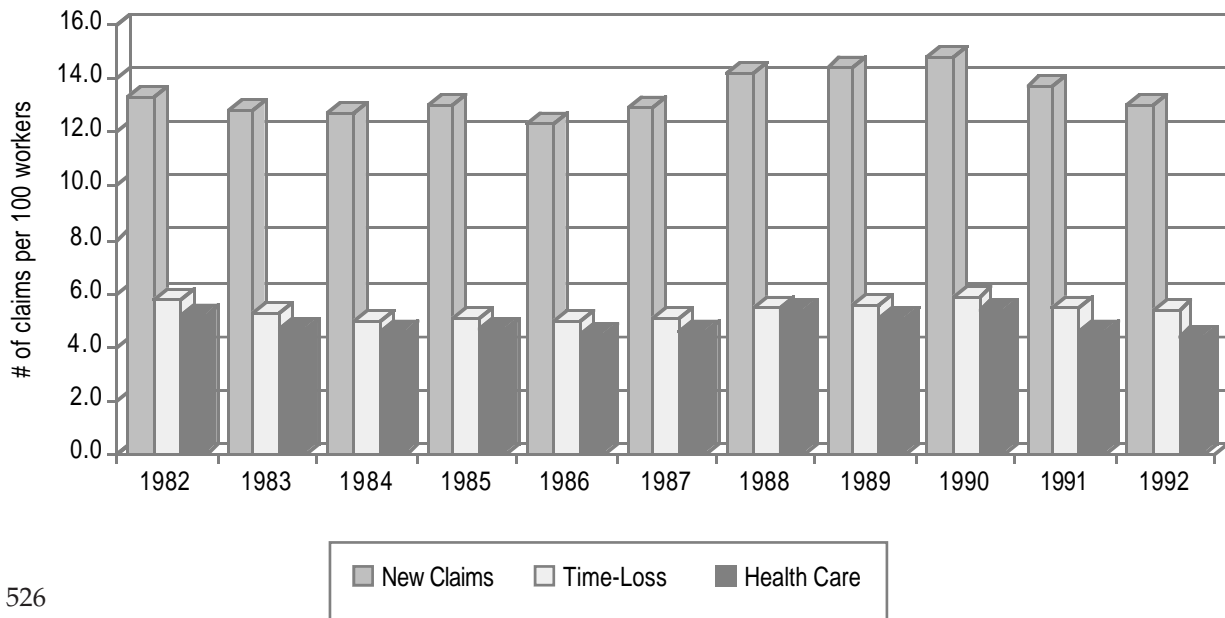


Table 8.3 — Wage-Loss Claims by Type, 1982–1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
Short-Term Disability Claims	67,655	60,612	57,491	59,855	60,851	64,073	71,381	77,425	83,044	77,664	77,274
Per 100 Workers	5.6	5.1	4.8	4.9	4.8	4.9	5.3	5.4	5.7	5.2	5.1
Long-Term Disability Claims	2,424	2,531	2,419	2,071	2,095	2,656	3,272	3,446	3,935	3,431	3,583
Per 1,000 Workers	2.0	2.1	2.0	1.7	1.6	2.0	2.4	2.4	2.7	2.3	2.4
Fatal Claims Adjudicated	176	148	134	126	120	140	162	175	168	141	146
Per 10,000 Workers	1.5	1.2	1.1	1.0	0.9	1.1	1.2	1.2	1.1	0.9	1.0
Fatal Claims Reported	208	165	174	202	154	190	212	218	204	183	157
Per 10,000 Workers	1.7	1.4	1.5	1.7	1.2	1.5	1.6	1.5	1.4	1.2	1.0
Time-Loss Claims	70,255	63,291	60,044	62,052	63,066	66,869	74,815	81,046	87,147	81,236	81,003
Per 100 Workers	5.8	5.3	5.0	5.1	5.0	5.1	5.5	5.6	5.9	5.5	5.3

SOURCE: Workers' Compensation Board, 1982–1992 annual reports

NOTES:

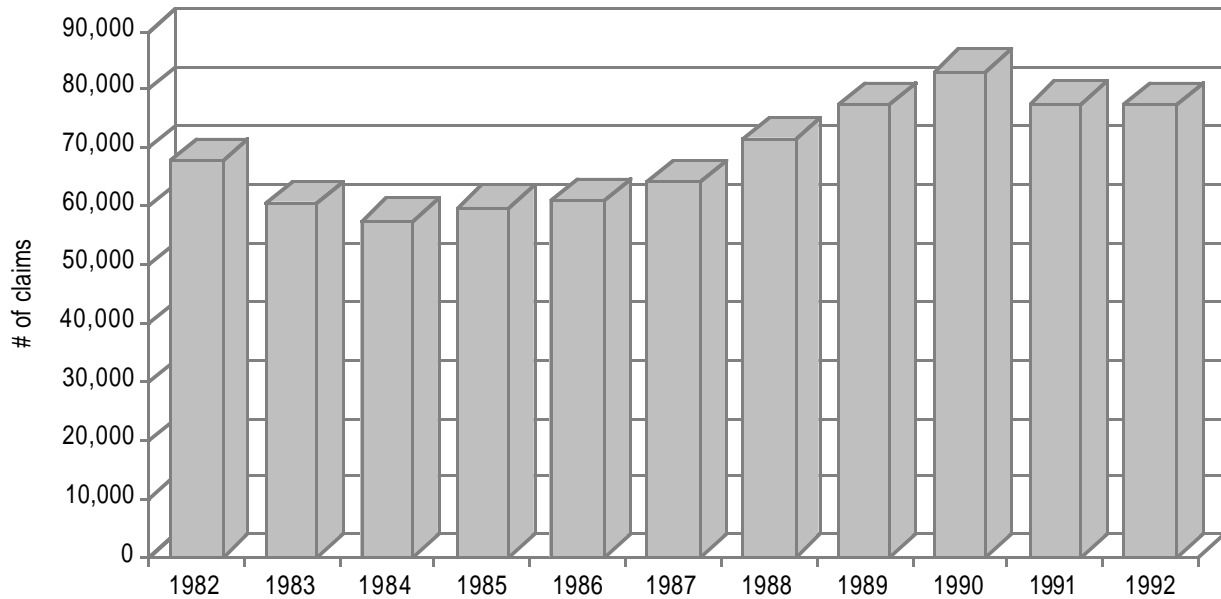
Figures obtained from the "Quarterly and Y.T.D. statement of claim counts" report — W.C.B. Statistical Services

Time-loss claims = short-term disability (total) + long-term disability + fatal adjudicated

Fatal claims reported — in the period are deaths that occurred in the period and were reported to the Board within two weeks of the end of the period

Table 8.3

Time-Loss Claims by Type, 1982–1992
Short-Term Disability Claims



Time-Loss Claims by Type, 1982–1992
Short-Term Disability Claims
Per 100 Workers

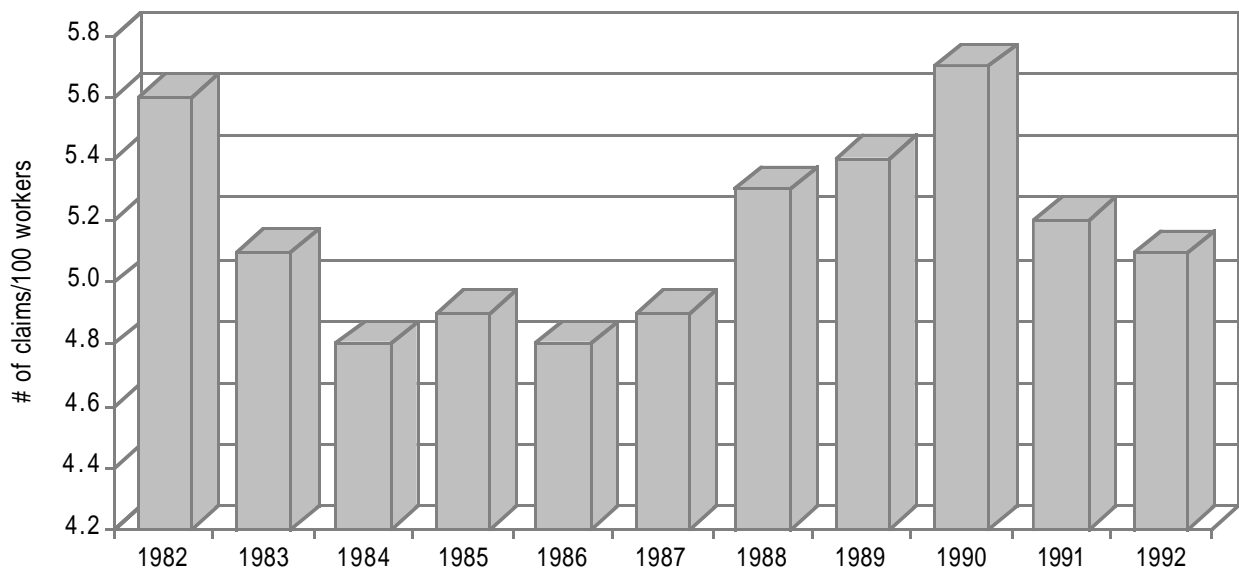
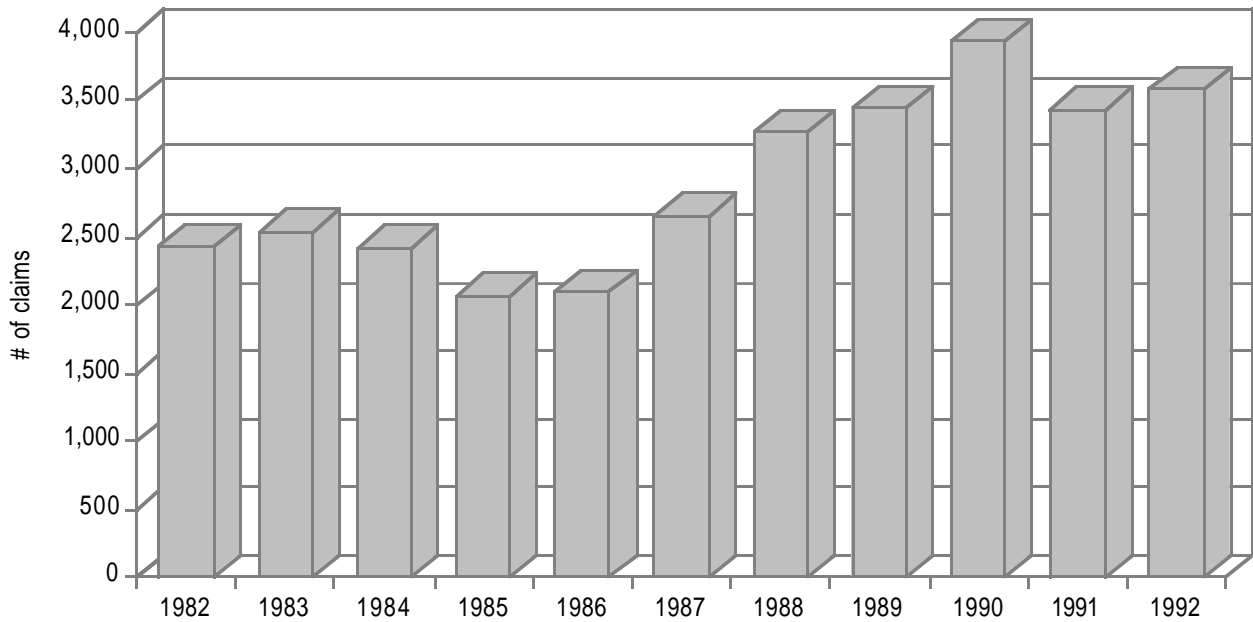


Table 8.3

Time-Loss Claims by Type, 1982–1992
Long-Term Disability Claims



Time-Loss Claims by Type, 1982–1992
Long-Term Disability Claims
Per 1,000 Workers

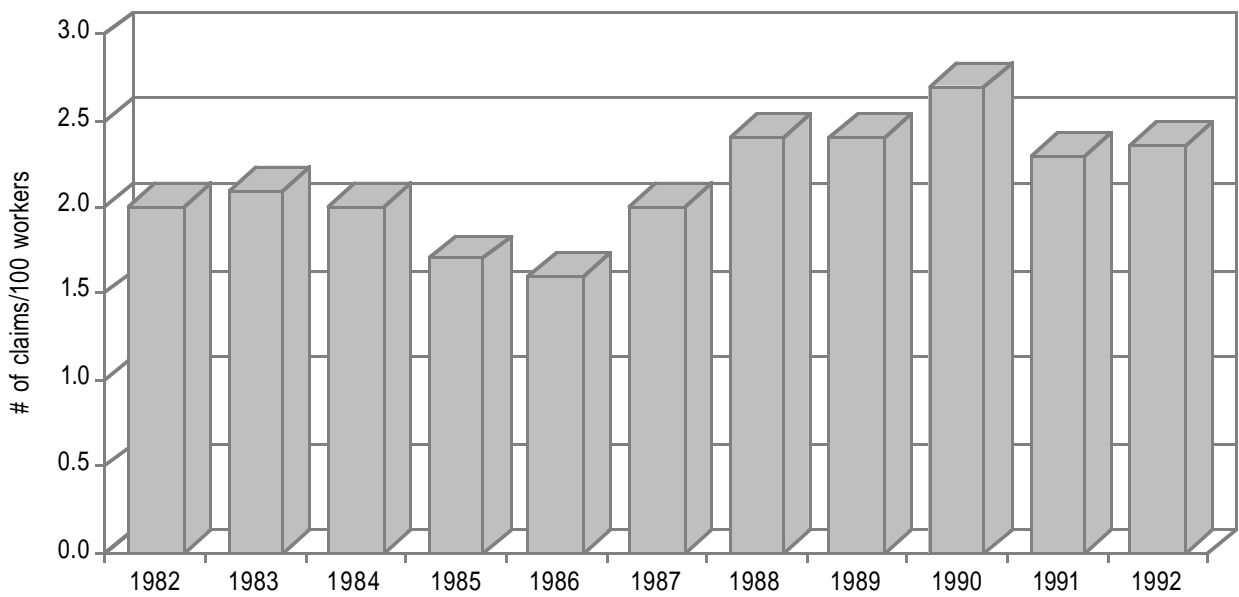
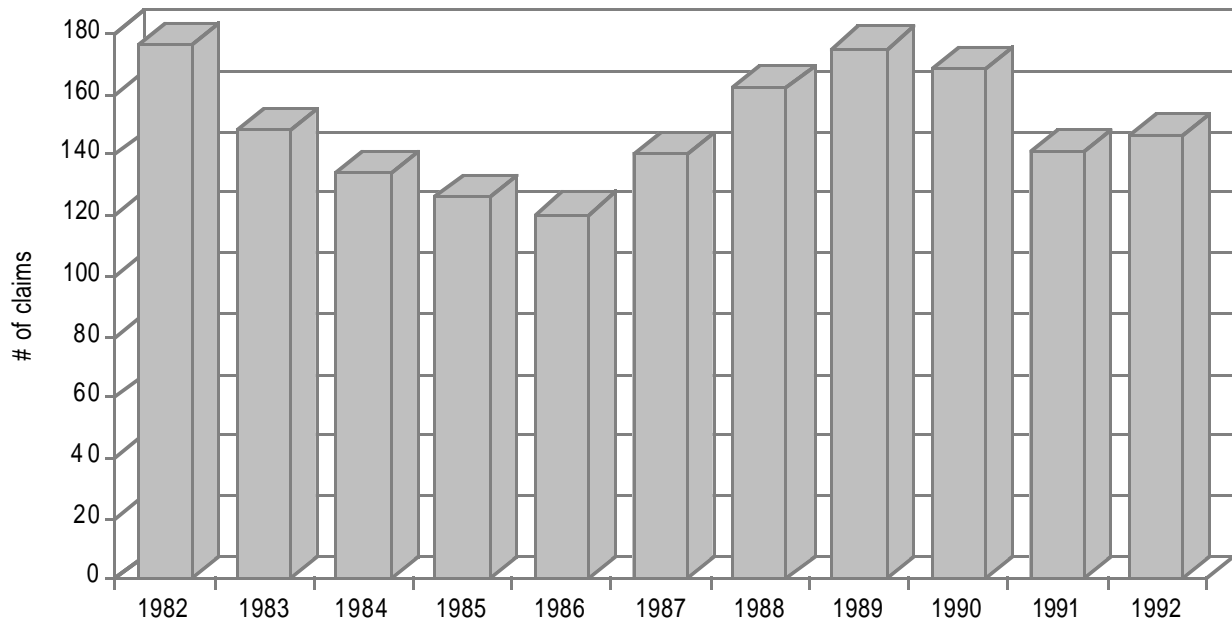


Table 8.3

Time-Loss Claims by Type, 1982-1992
Fatal Claims Adjudicated



Time-Loss Claims by Type, 1982-1992
Fatal Claims Adjudicated
Per 10,000 Workers

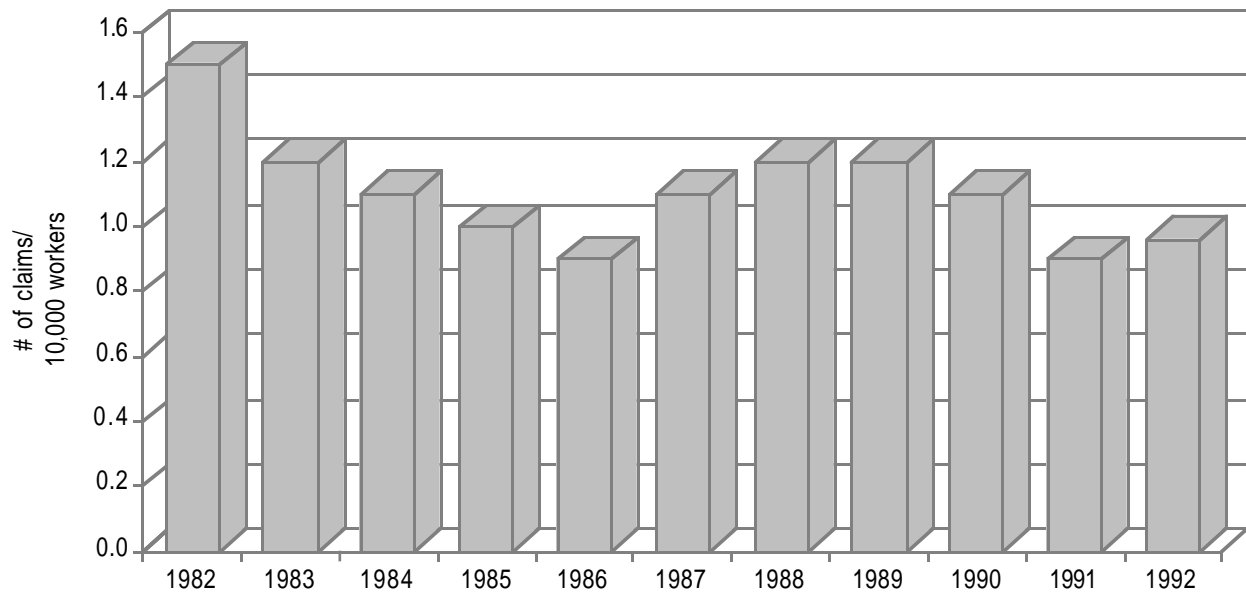
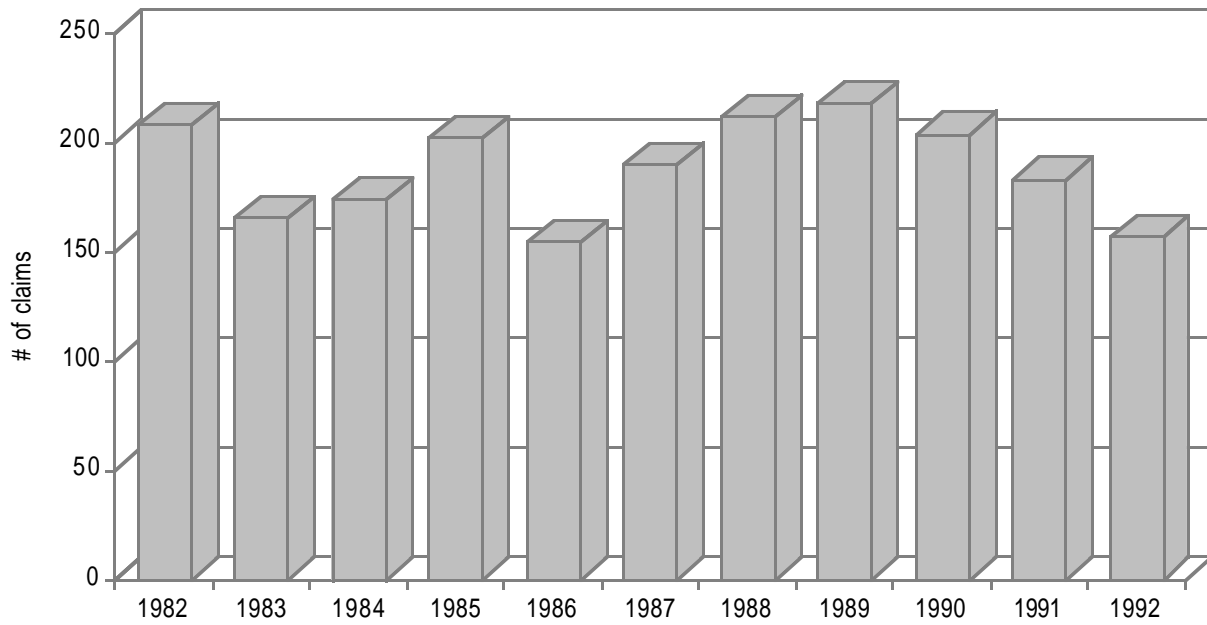


Table 8.3

Time-Loss Claims by Type, 1982–1992
Fatal Claims Reported



Time-Loss Claims by Type, 1982–1992
Fatal Claims Reported
Per 10,000 Workers

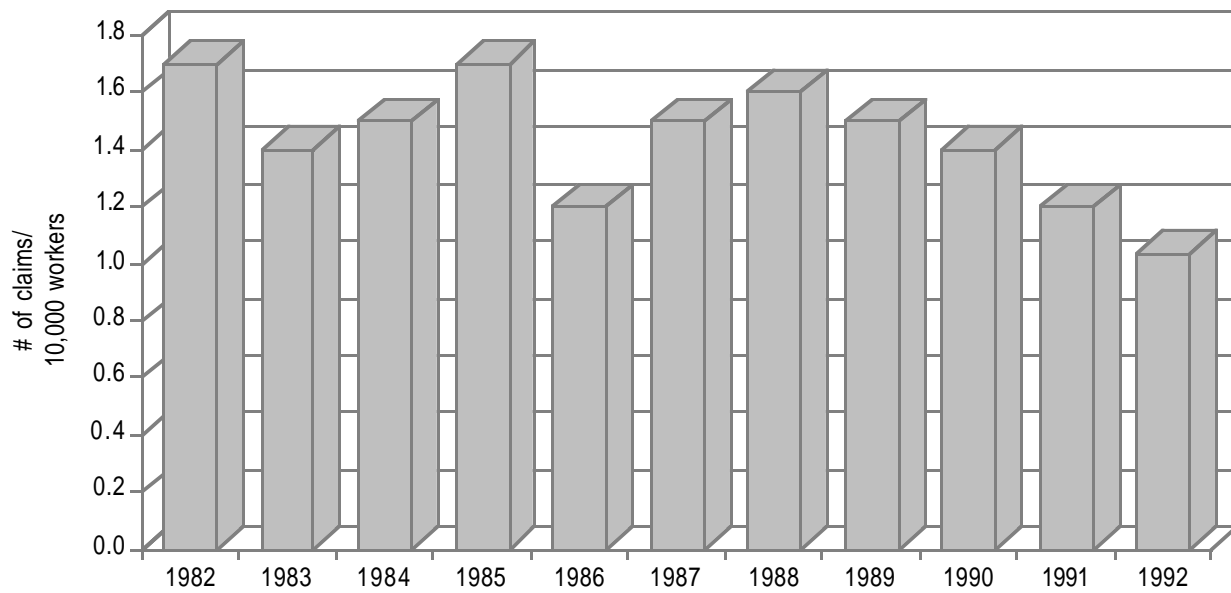
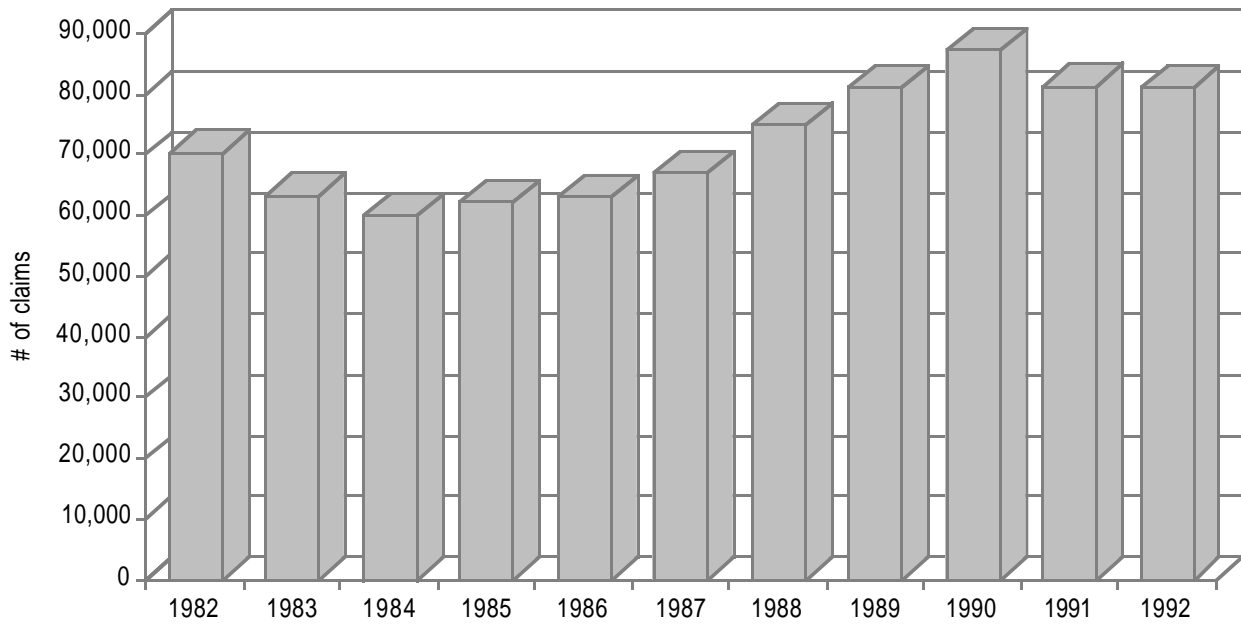


Table 8.3

Time-Loss Claims by Type, 1982-1992
All Time-Loss Claims



Time-Loss Claims by Type, 1982-1992
All Time-Loss Claims
Per 100 Workers

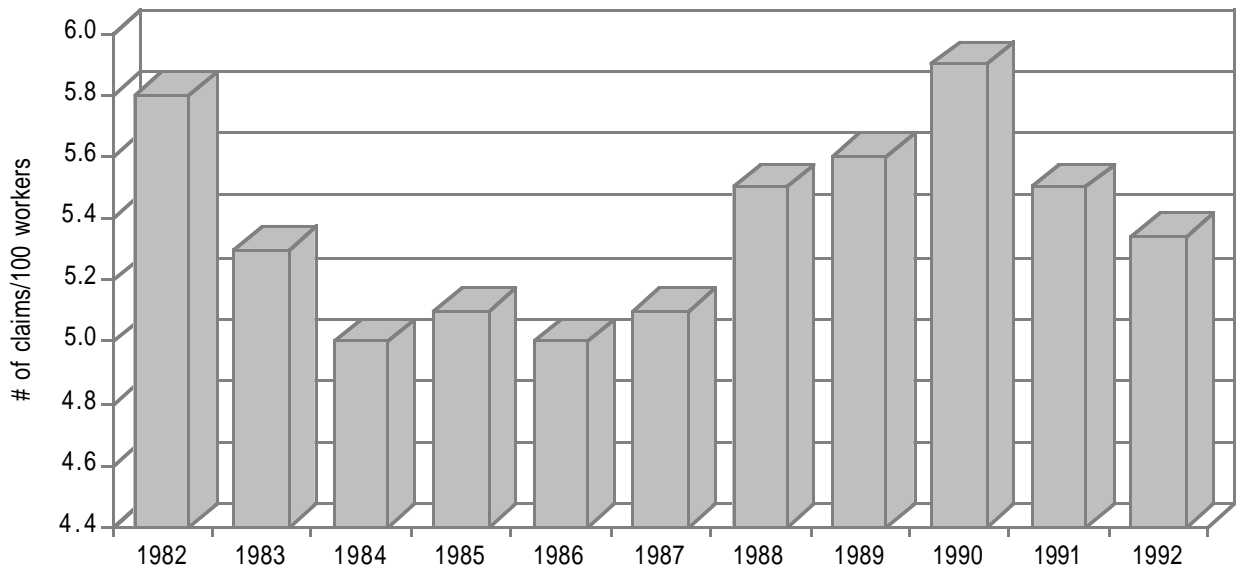


Table 8.4 — Appeals Activity at W.C.R.B., 1982–1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
W.C.R.B. Appeals Received	4,090	4,090	5,082	4,045	3,921	4,248	4,966	5,636	6,749	7,164	6,624
Per 1,000 Workers	3.4	3.4	4.3	3.3	3.1	3.3	3.7	3.9	4.6	4.8	4.4
Per 100 Time-Loss Claims	5.8	6.5	8.5	6.5	6.2	6.4	6.6	7.0	7.7	8.8	8.2
Findings	2,746	2,867	3,111	2,917	3,259	4,013	4,154	4,141	3,900	4,300	4,932
Per 1,000 Workers	2.3	2.4	2.6	2.4	2.6	3.1	3.1	2.9	2.7	2.8	3.3
Per 100 Time-Loss Claims	3.9	4.5	5.2	4.7	5.2	6.0	5.6	5.1	4.5	5.3	6.1
Summaries	501	748	903	757	788	1,173	1,221	1,233	1,353	1,603	1,798
Per 100 Time-Loss Claims	0.7	1.2	1.5	1.2	1.2	1.8	1.6	1.5	1.6	2	2.2
Total W.C.R.B. Decisions	3,247	3,615	4,014	3,674	4,047	5,186	5,375	5,374	5,253	5,903	6,730
Per 100 Time-Loss Claims	4.6	5.7	6.7	5.9	6.4	7.8	7.2	6.6	6.0	7.3	8.3
Number of W.C.R.B. Panels	7	7	7	7	12	14	14	14	14	14	14

SOURCE: Workers' Compensation Review Board

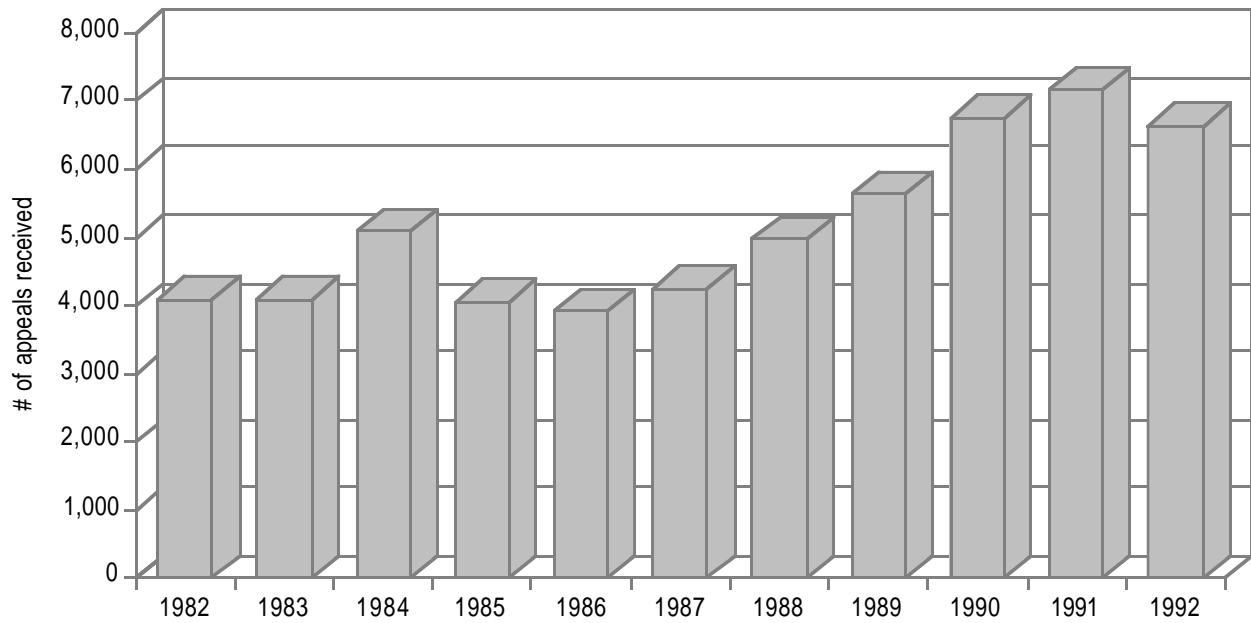
Figures obtained from the 1992 *Annual Report of the Appeal Division*

Number of workers = average employment in B.C. (*Workers' Compensation in British Columbia: An Administrative Inventory at a Time of Transition, 1991, Table 8.1*)

Time-loss claims = S.T.D. + L.T.D. claims + fatals (*Workers' Compensation in British Columbia: An Administrative Inventory at a Time of Transition, 1991, Table 8.2*)

Table 8.4

Appeal Activity at W.C.R.B., 1982-1992
W.C.R.B. Appeals Received



Appeal Activity at W.C.R.B., 1982-1992
Total W.C.R.B. Decisions

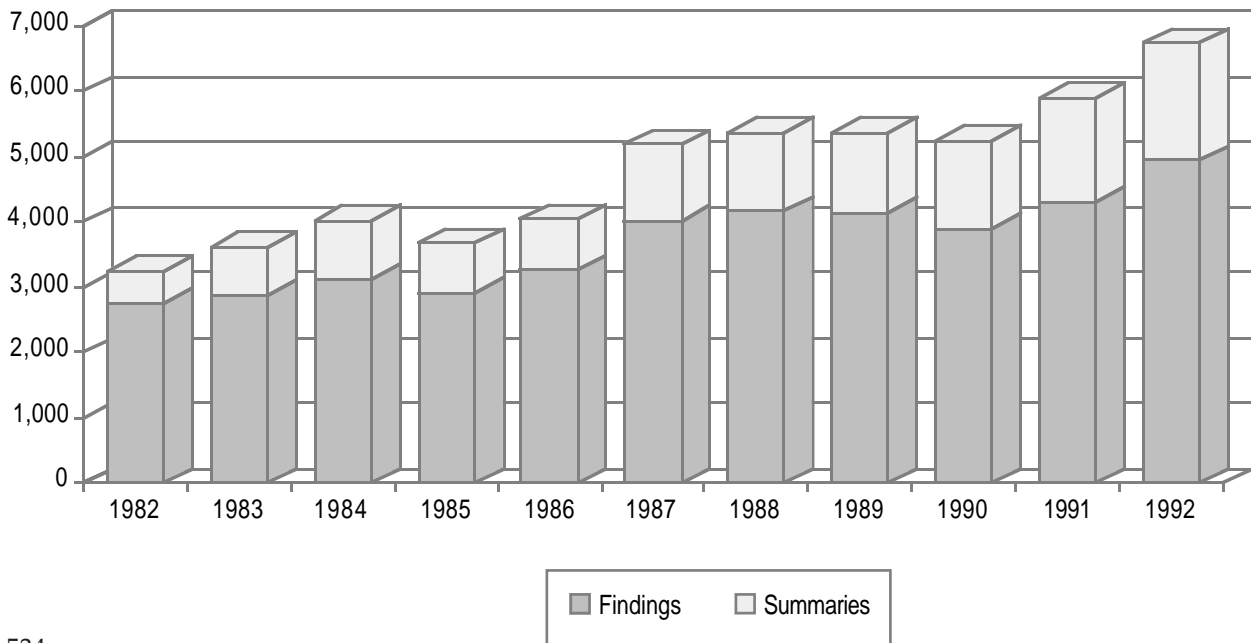
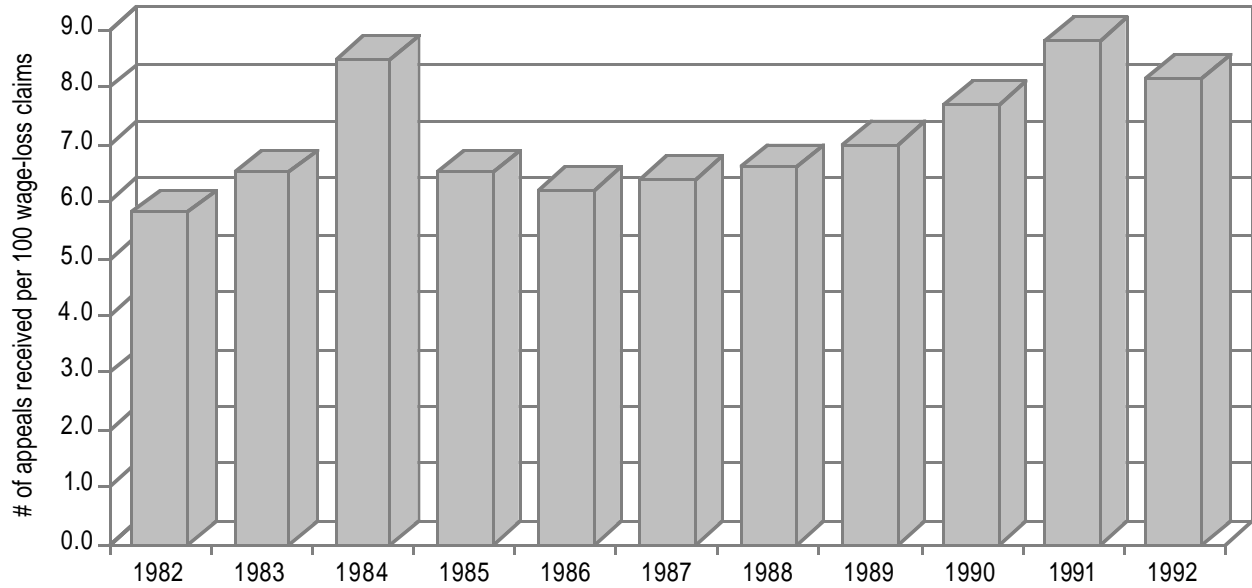


Table 8.4

Appeal Activity at W.C.R.B., 1982–1992
W.C.R.B. Appeals Received
Per 100 Time-Loss Claims



Appeal Activity at W.C.R.B., 1982–1992
Total W.C.R.B. Decisions
Per 100 Time-Loss Claims

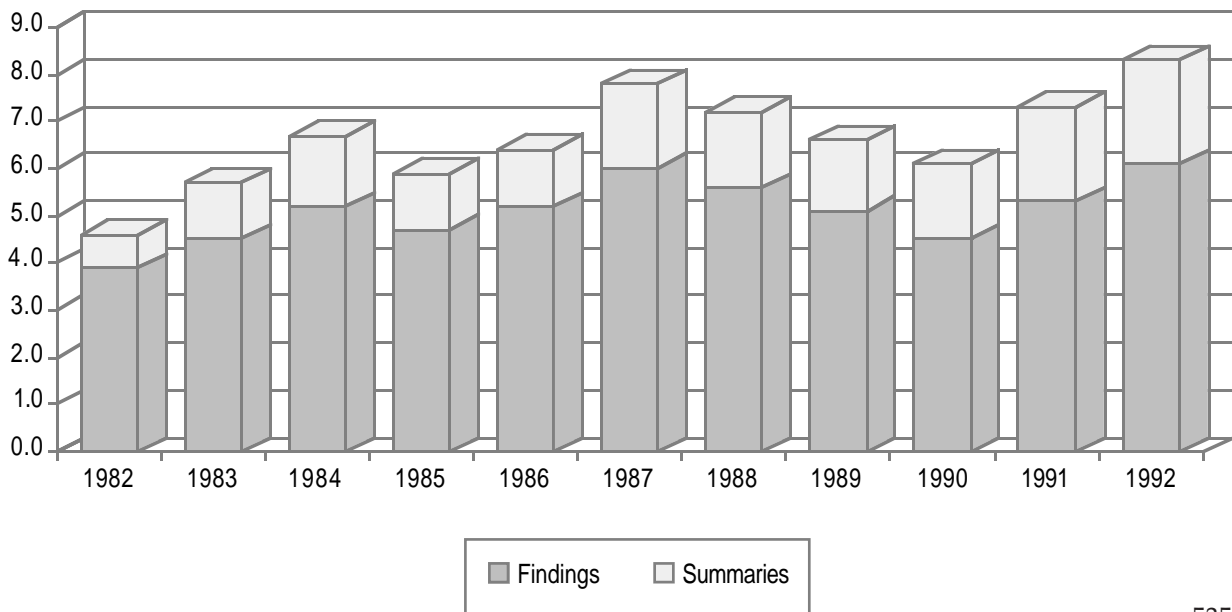
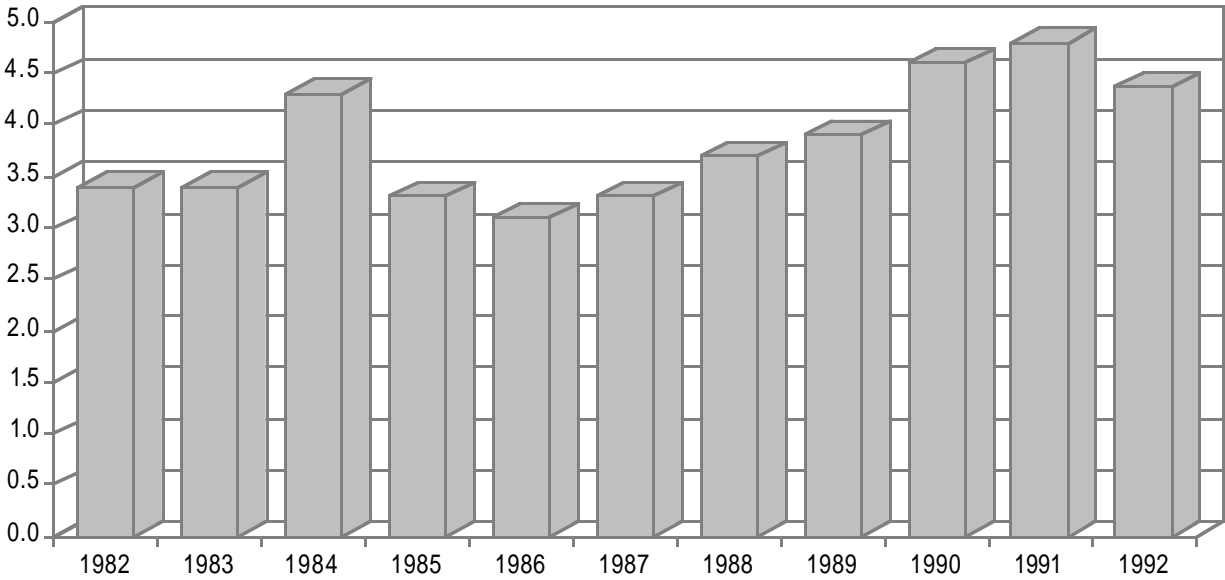


Table 8.4

Appeal Activity at W.C.R.B., 1982-1992
W.C.R.B. Appeals Received
Per 1,000 Workers



Appeal Activity at W.C.R.B., 1982-1992
Findings
Per 1,000 Workers

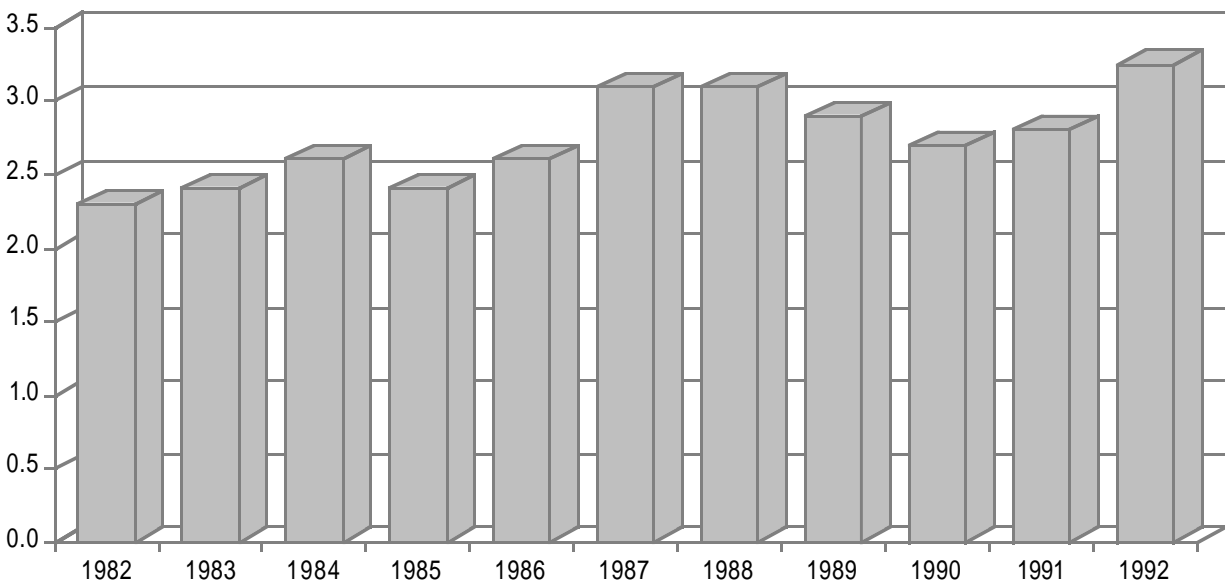


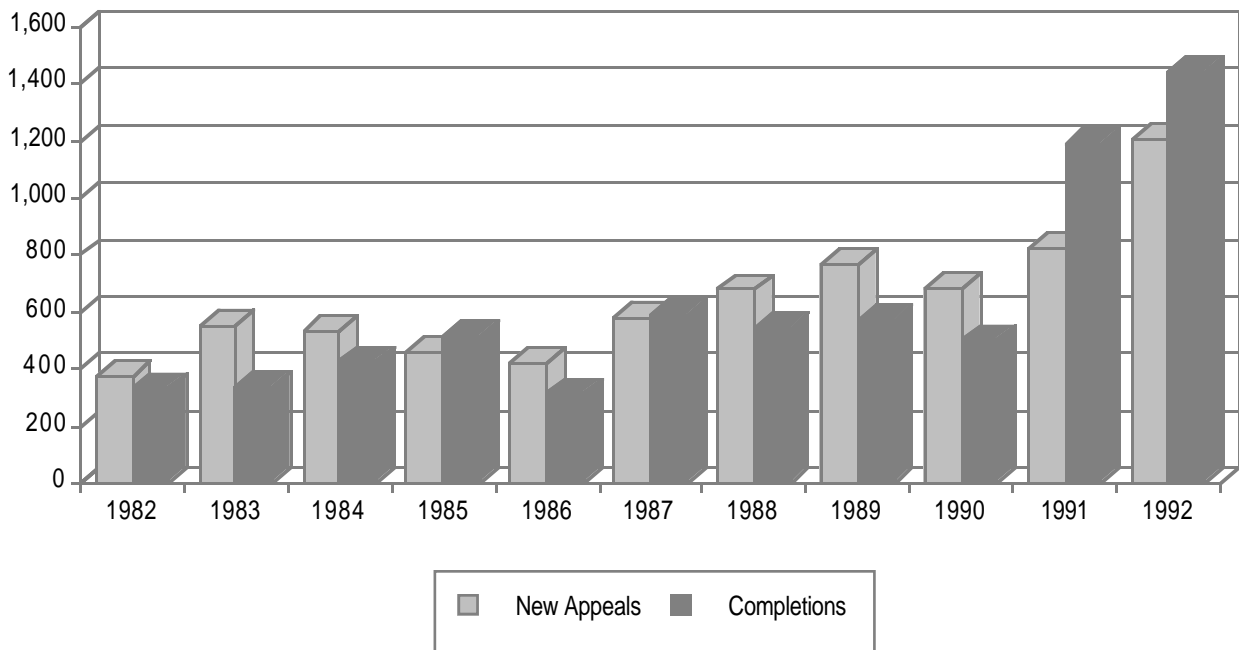
Table 8.5 — Appeals Division, 1982–1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
S.91 Appeals											
New Appeals	378	553	532	459	419	582	678	766	682	822	1,206
Completions	333	339	426	512	313	588	542	570	501	1,186	1,438
S.73 Penalty Appeals											
New Appeals	N/A	N/A	N/A	N/A	N/A	N/A	119	163	326	255	179
Completions	N/A	N/A	N/A	N/A	N/A	N/A	133	122	207	234	340
S.96(4) R.B. Referrals											
New Appeals	143	86	65	217	174	398	213	138	167	43	1
Completions	142	82	64	133	178	269	305	183	162	80	12
S.39(1) Employer – Relief of Costs											
New Appeals	N/A	N/A	N/A	N/A	N/A	N/A	8	15	39	763	219
Completions	N/A	N/A	N/A	N/A	N/A	N/A	14	7	26	44	532
Reconsideration Prior Dec.											
New Appeals	N/A	N/A	N/A	N/A	N/A	N/A	48	69	108	97	98
Completions	N/A	N/A	N/A	N/A	N/A	N/A	57	68	107	90	91

SOURCE: Workers' Compensation Board, Appeals Administration Data

Table 8.5

Commissioners' Appeals, 1982-1992
Section 91 Appeals



Commissioners' Appeals, 1982-1992
Section 96(4) Appeals

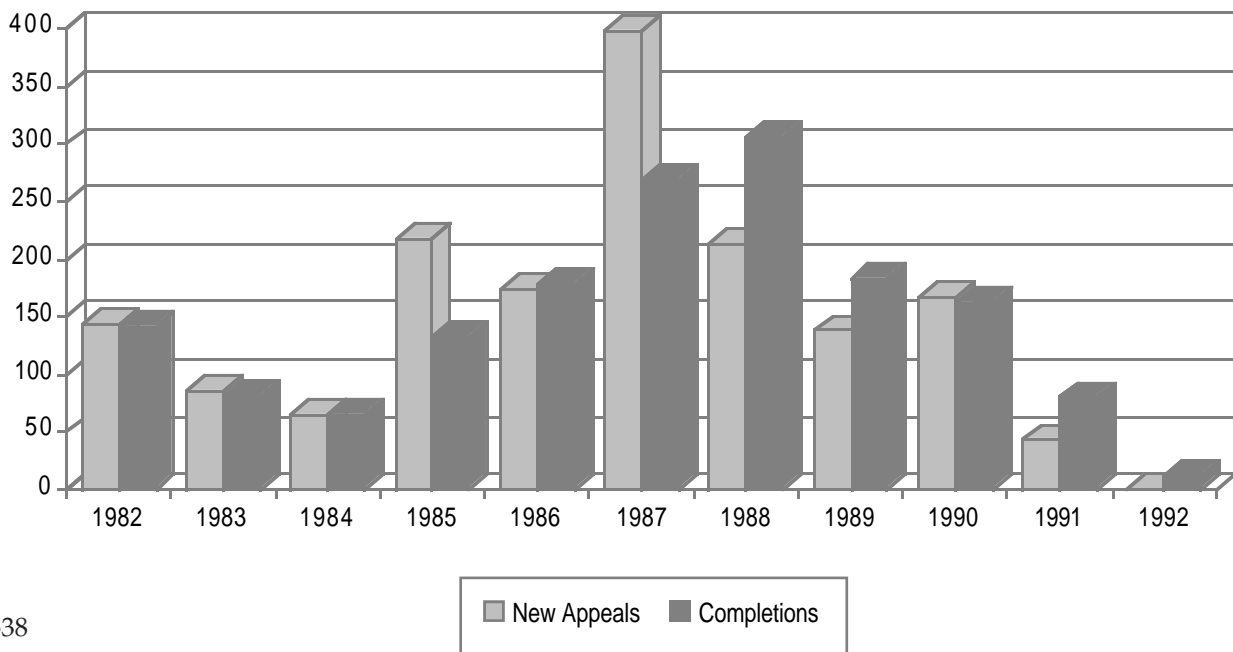


Table 8.6 — W.C.B. Staffing Levels, 1982–1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
Total W.C.B. Staff	1,638	1,524	1,435	1,391	1,433	1,528	1,611	1,711	2,034	2,270	2,472
Compensation Services Staff	654	606	567	563	567	588	616	687	747	837	868
Per 1,000 Initial Claims	4.1	3.9	3.8	3.5	3.6	3.5	3.2	3.3	3.4	4.1	4.4
Comp. Adjudicators (C.A. + C.O.)	165	164	144	138	143	146	164	167	191	201	230
Per 1,000 Short- & Long-Term Disability Claims	2.3	2.3	2.4	2.2	2.3	2.2	2.2	2.1	2.2	2.5	2.8
Voc. Rehab. Consultants	52	51	47	41	44	47	58	56	68	81	85
Per 100 Long-Term Disability Claims	2.1	2.0	1.9	2.0	2.1	1.8	1.8	1.6	1.7	2.4	2.4

SOURCE: Workers' Compensation Board, *Workers' Compensation in British Columbia: An Administrative Inventory at a Time of Transition, 1991*

Table 8.6

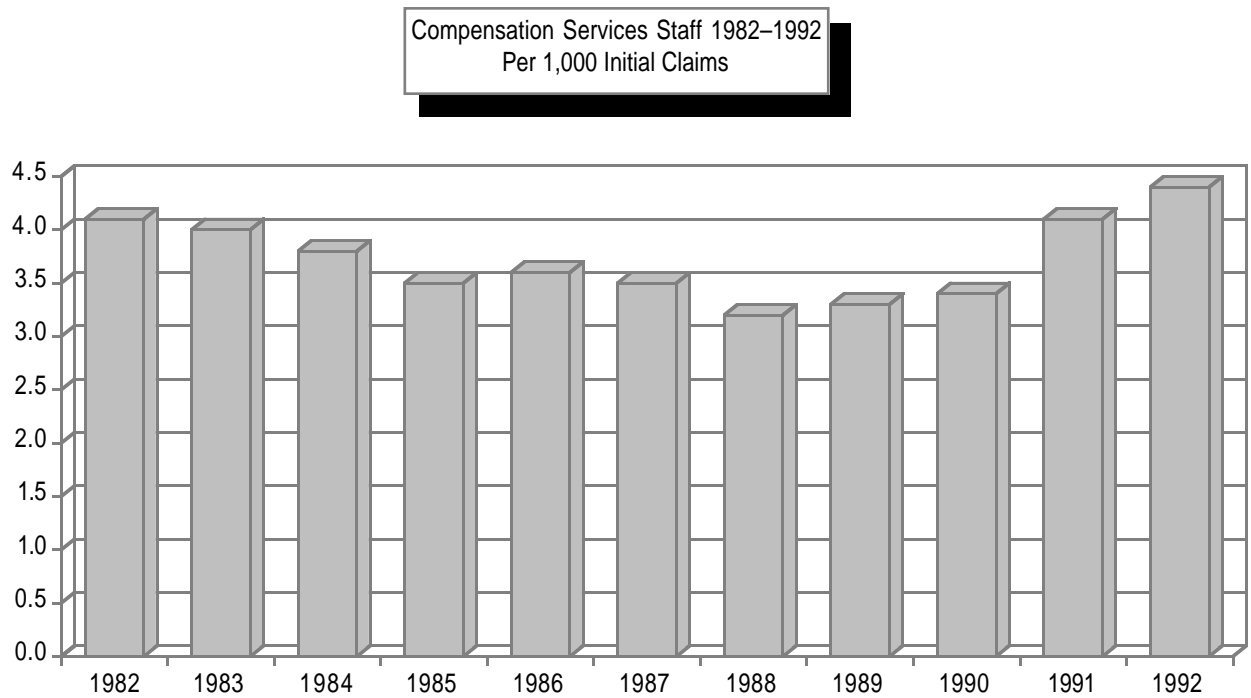
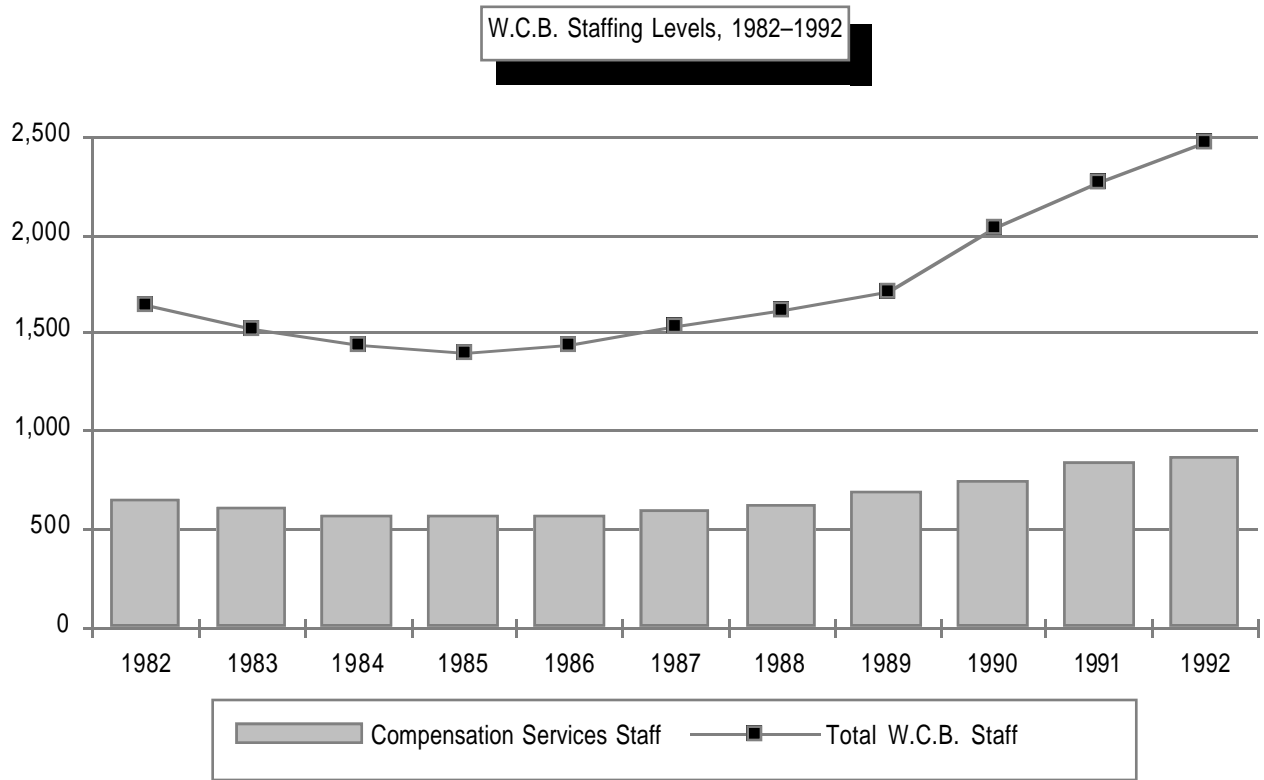
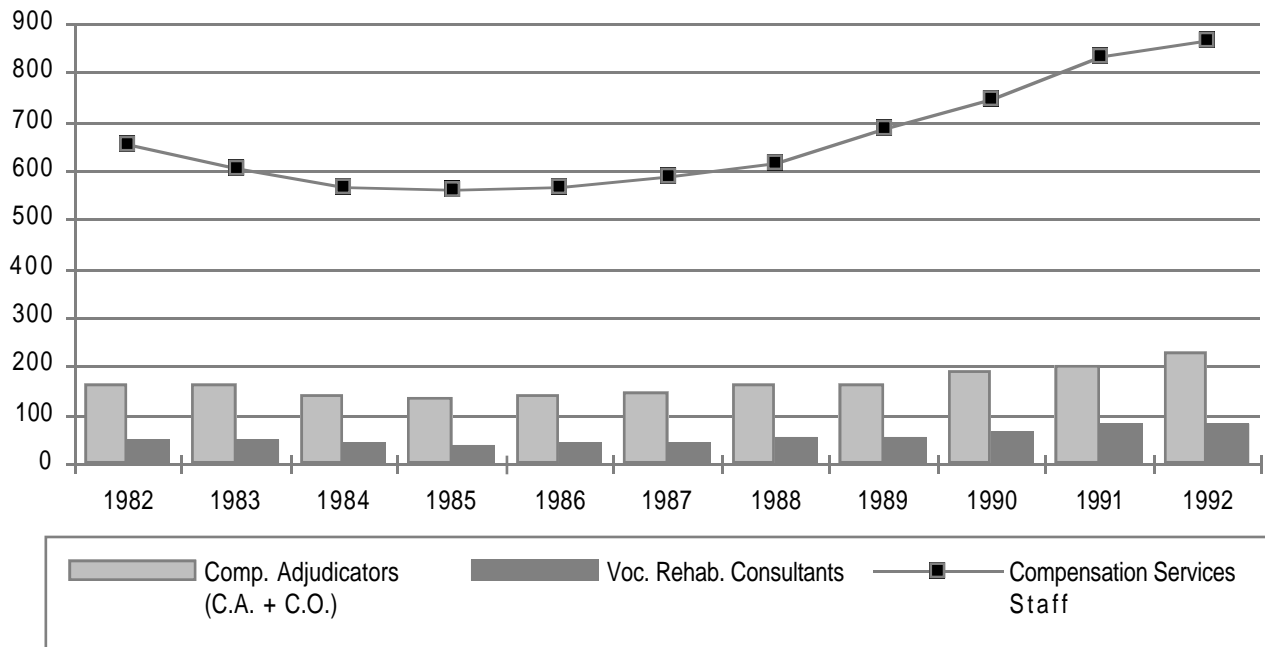


Table 8.6

Compensation Services Staff, 1982-1992



W.C.B. Staffing Levels, 1982-1992
Compensation Adjudicators (C.A. + C.O.)
Per 1,000 Short- & Long-Term Disability Claims

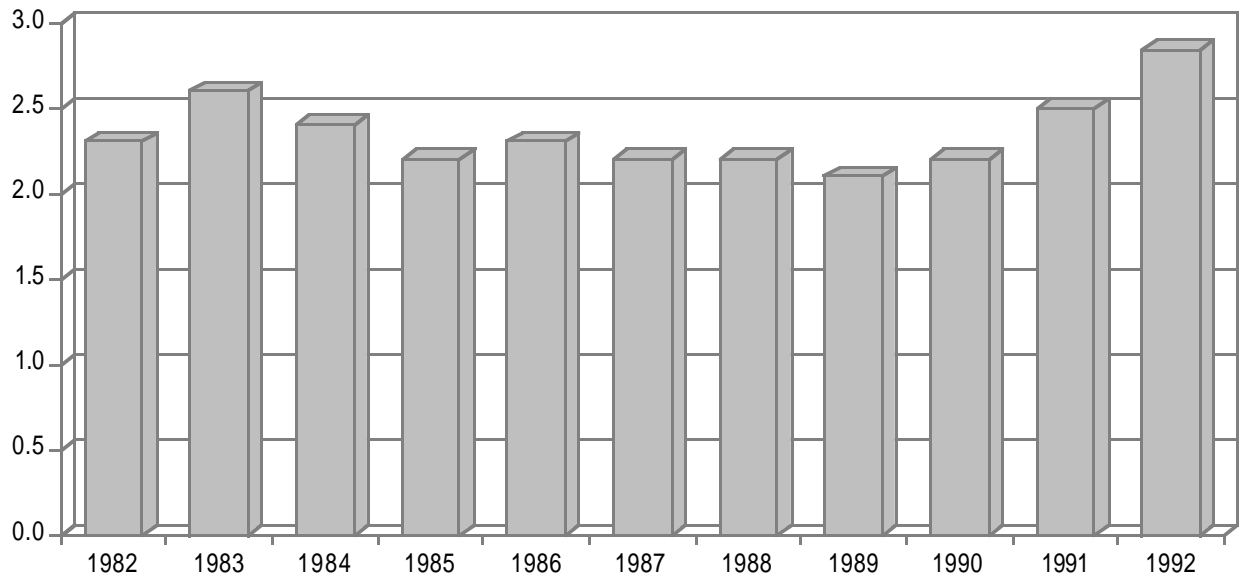


Table 8.6

W.C.B. Staffing Levels, 1982-1992
Voc. Rehab. Consultants
Per 100 Long-Term Disability Claims

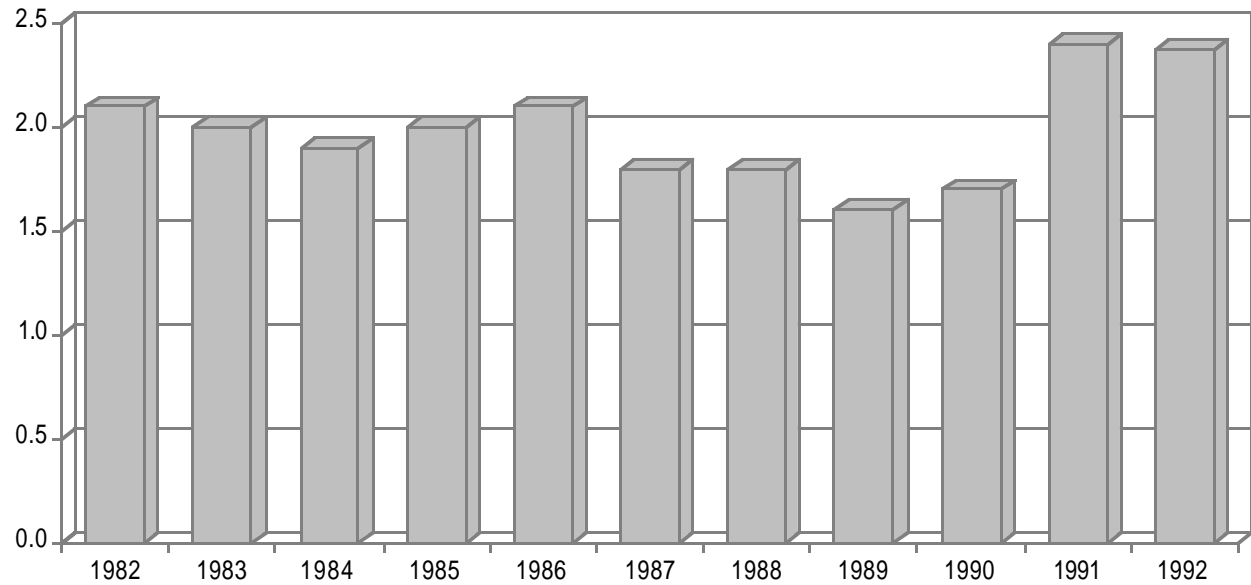


Table 8.7 — Total Claim Costs by Type of Disability, 1982–1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
Claim Costs Charged by Type in (\$'000)											
Health Care Only Claims	\$6,527	\$6,739	\$6,834	\$7,249	\$8,185	\$10,013	\$13,283	\$13,523	\$15,817	\$18,405	\$17,429
Short-Term Disability Claims	\$161,437	\$158,678	\$150,565	\$150,032	\$163,117	\$180,793	\$206,219	\$224,616	\$250,167	\$271,849	\$317,380
Long-Term Disability Claims	\$101,252	\$105,654	\$96,363	\$80,789	\$78,366	\$102,437	\$156,318	\$159,407	\$193,846	\$194,684	\$275,465
Fatal Claims	\$19,453	\$16,303	\$16,594	\$13,382	\$17,313	\$19,369	\$23,804	\$24,260	\$24,927	\$25,312	\$29,676
Total	\$288,668	\$287,375	\$270,357	\$251,452	\$266,981	\$312,613	\$399,625	\$421,806	\$484,757	\$510,250	\$639,950
Total Cost Per Worker	\$240	\$241	\$227	\$206	\$210	\$239	\$294	\$294	\$330	\$343	\$422

SOURCE: Workers' Compensation Board, annual reports

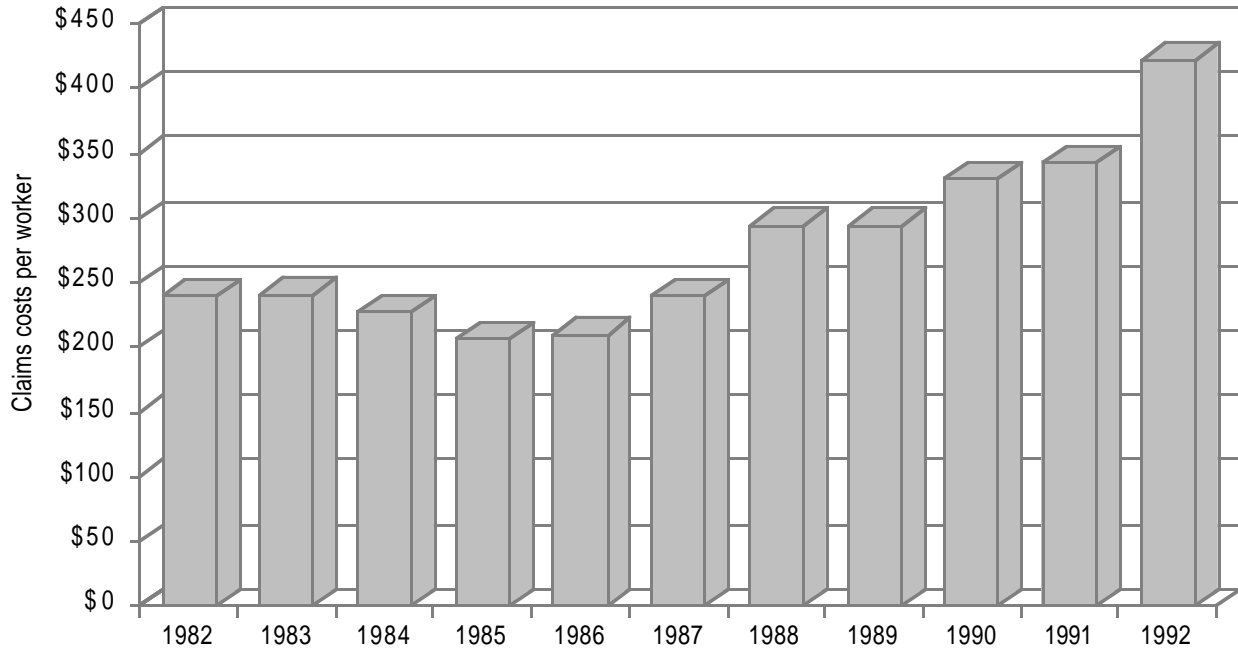
NOTES:

Figures obtained from W.C.B. Statistical Services

Total cost per worker — number of workers (average employment in B.C. — figure in *Workers' Compensation in British Columbia: An Administrative Inventory at a Time of Transition, 1991*, Table 8.1

Table 8.7

Total Claims Costs Per Worker, 1982–1992



Total Claims Costs by Type of Disability, 1982–1992

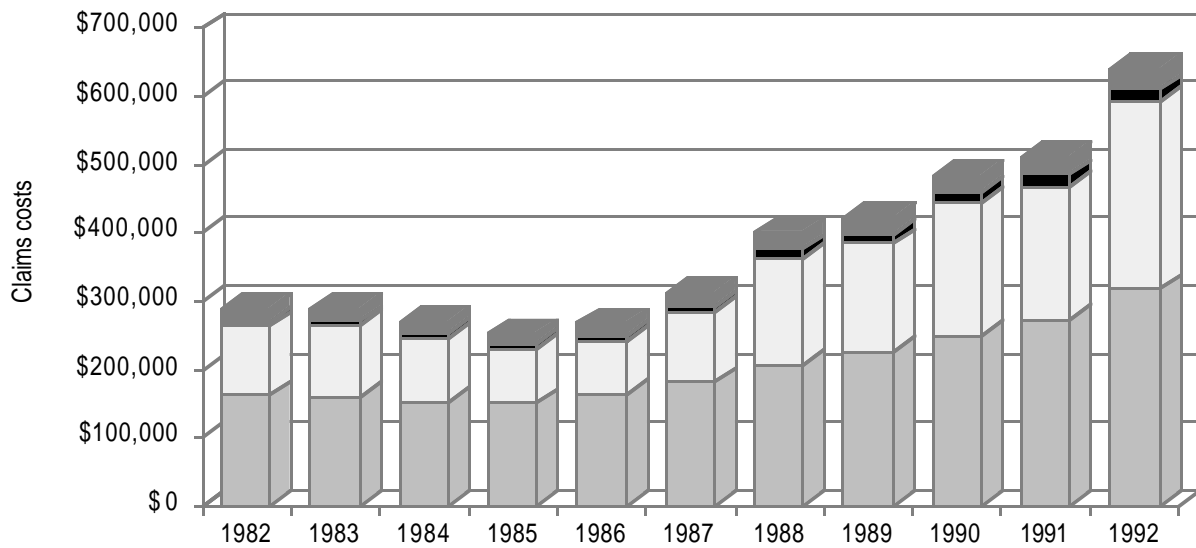


Table 8.8 — Administrative Costs of the W.C.B., 1982–1992

	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992
Costs in (\$000)											
W.C.B. Administrative Cost	\$66,908	\$67,866	\$67,007	\$65,858	\$69,289	\$75,153	\$88,033	\$97,863	\$119,104*	\$141,625	\$161,850
Compensation Services Admin. Cost	N/A	N/A	\$21,394	\$19,162	\$19,666	\$24,767	\$28,591	\$30,951	\$37,291	\$45,011**	\$51,678
Per Time-Loss Claim			\$356	\$309	\$312	\$370	\$382	\$382	\$428	\$559	\$638
Per New Claim Registered			\$142	\$121	\$126	\$147	\$149	\$150	\$172	\$223	\$261

SOURCE: Workers' Compensation Board Accounting Department and 1982–1992 annual reports

* This figure is different from the one published in the 1991 annual report due to changes in W.C.B. accounting policies.

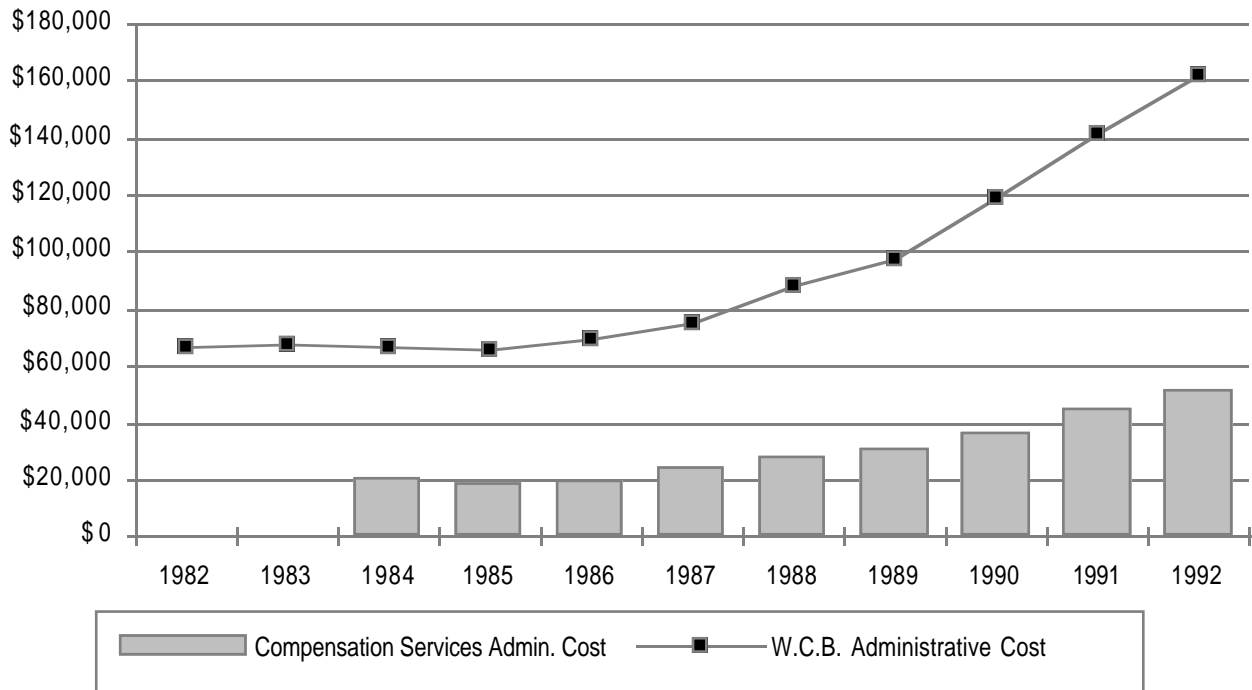
** This number has been revised with Mail Room administration costs excluded as it is no longer part of Compensation Services.

W.C.B. administration cost — annual report schedule 2 — statement of admin. and other expenses

Total administration cost and other expense — research grants and awards + review board and advisers

Table 8.8

Administrative Costs of the W.C.B., 1982-1992



Administrative Costs, 1984-1992
Compensation Services

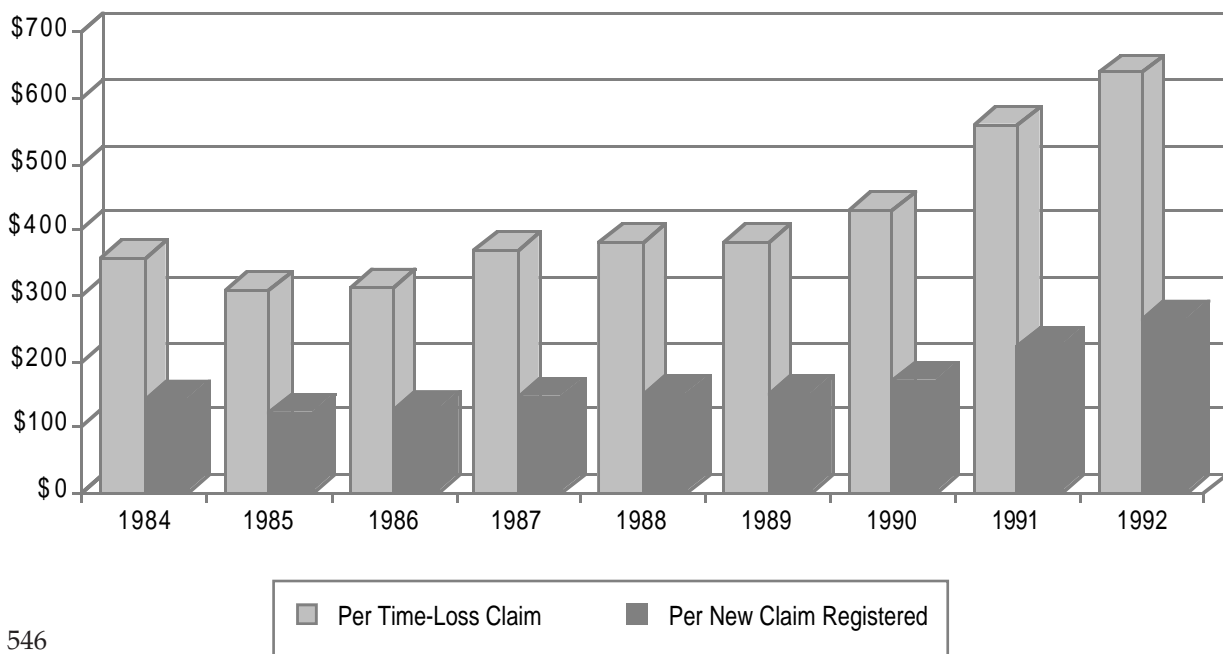


Table 8.9(a) — Administrative Costs of the W.C.B., 1984–1992

	1984	1985	1986	1987	1988	1989	1990	1991	1992
W.C.B. Administrative Cost (\$000)	\$67,007	\$65,858	\$69,289	\$75,153	\$88,033	\$97,863	\$119,104*	\$141,625	\$161,850
Per Time-Loss Claim	\$1,116	\$1,061	\$1,099	\$1,124	\$1,177	\$1,207	\$1,367	\$1,743	\$1,998
Per New Claim Registered	\$444	\$415	\$443	\$445	\$457	\$473	\$548	\$695	\$818
W.C.R.B. Administrative Cost (\$000)	N/A	N/A	\$2,761	\$4,219	\$4,257	\$4,750	\$5,385	\$6,307	\$6,377
Per Time-Loss Claim			\$44	\$63	\$57	\$59	\$62	\$78	\$79
Per New Claim Registered			\$18	\$25	\$22	\$23	\$25	\$31	\$32
Total Cost W.C.B. + W.C.R.B. (\$000)			\$72,050	\$79,372	\$92,290	\$102,613	\$124,489	\$147,932	\$168,227
Per Time-Loss Claim			\$1,142	\$1,187	\$1,234	\$1,266	\$1,428	\$1,821	\$2,077
Per New Claim Registered			\$461	\$469	\$479	\$496	\$573	\$726	\$851
Total Time-Loss Claims			63,066	66,869	74,815	81,046	87,147	81,236	81,003
Total New Claims Registered			156,312	169,059	192,515	207,019	217,152	203,740	197,793

SOURCE: Workers' Compensation Board Accounting Department

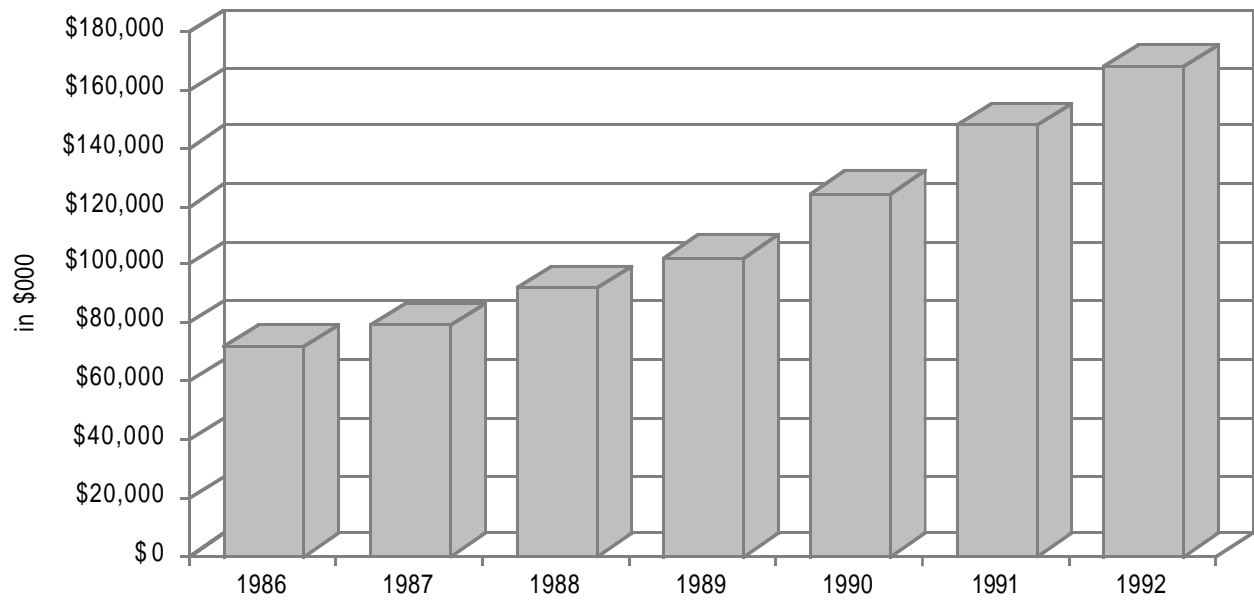
* This figure is different from the one published in 1990 Annual Report due to the changes in W.C.B. accounting policies.

The administrative costs for Review Board indicated in table 8.9(a) are based on the W.C.B. financial year from January 1 to December 31 which is different from the figures showing in Table 8.9

W.C.R.B. admin. cost obtained from the W.C.B.'s Accounting Department

Table 8.9(a)

Total Administrative Costs, 1986-1992
W.C.B. & W.C.R.B.



Total Administrative Costs, 1986-1992
W.C.B. & W.C.R.B.

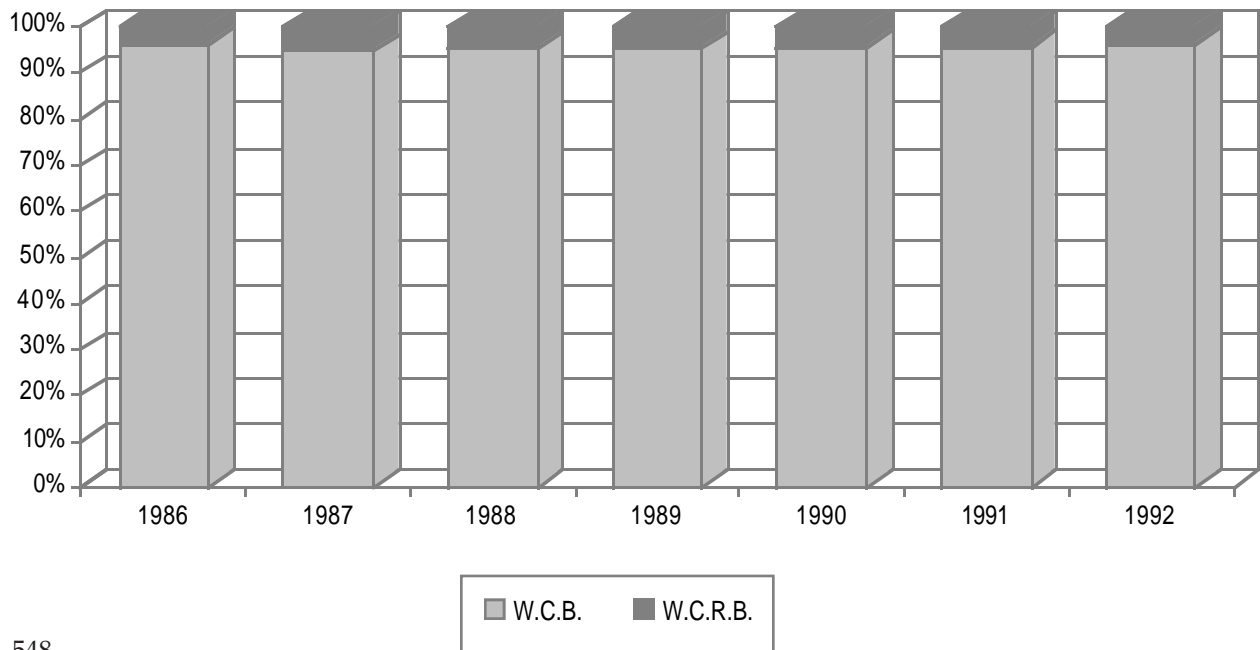
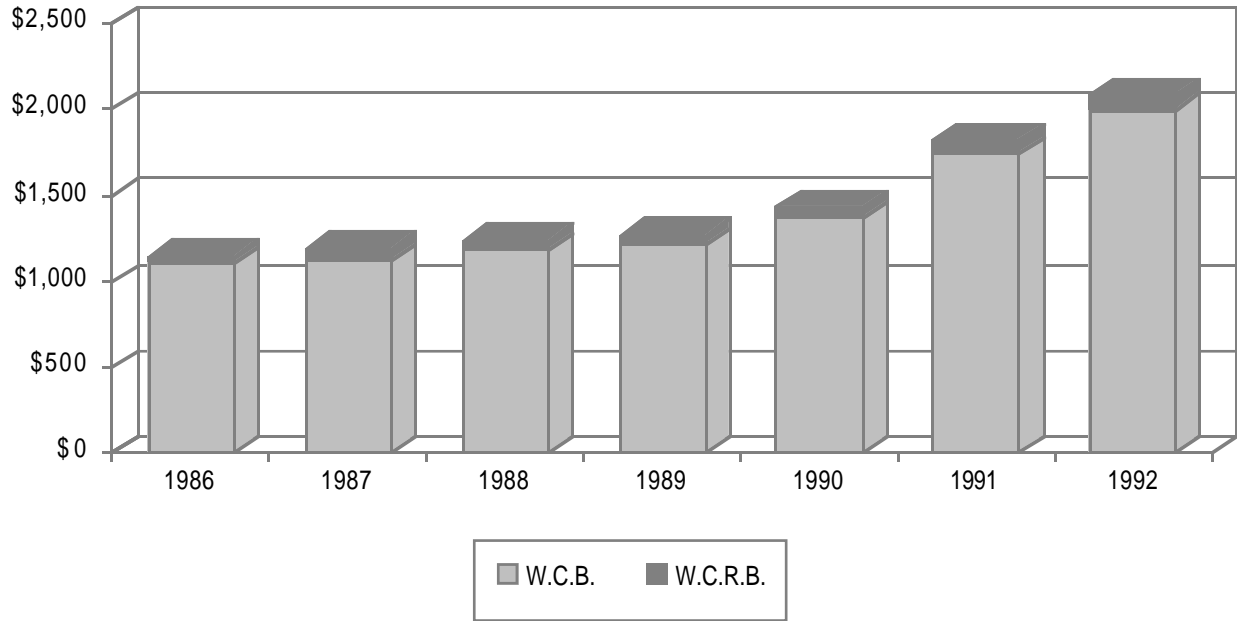


Table 8.9(a)

Total Administrative Costs, 1986-1992
W.C.B. & W.C.R.B.
Per Time-Loss Claims



Administrative Costs for W.C.B. & W.C.R.B., 1986-1992
Per Time-Loss Claims

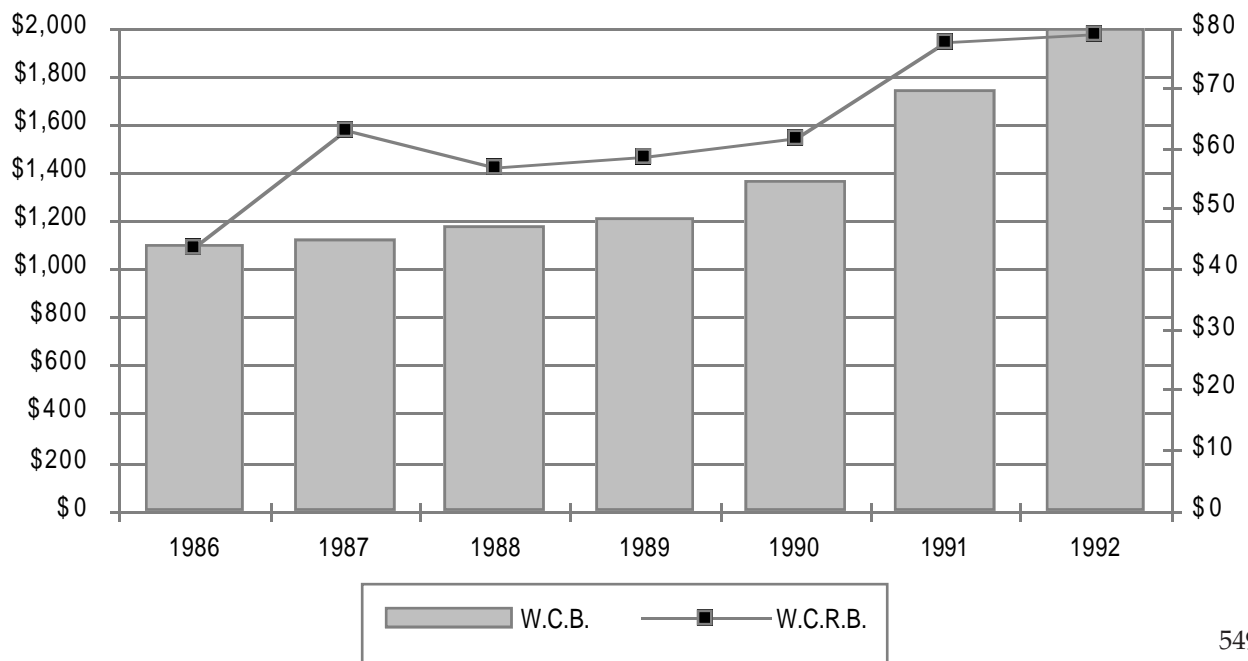
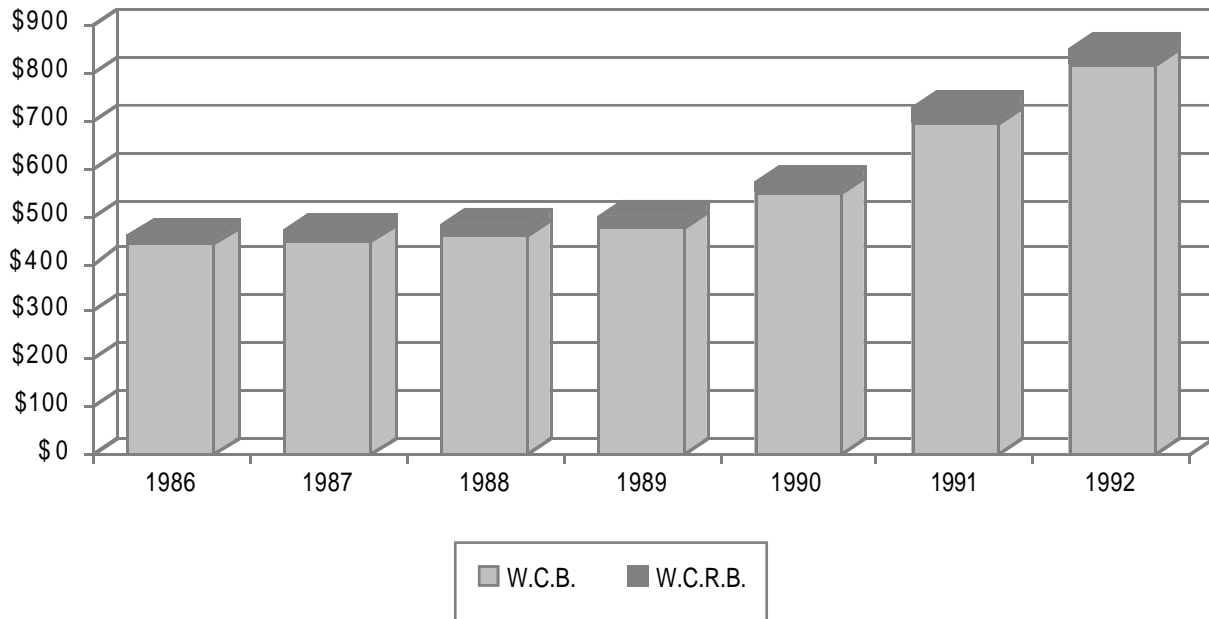


Table 8.9(a)

Total Administrative Costs, 1986-1992
W.C.B. & W.C.R.B.
Per New Claim Registered



Administrative Costs for W.C.B. & W.C.R.B., 1986-1992
Per New Claim Registered

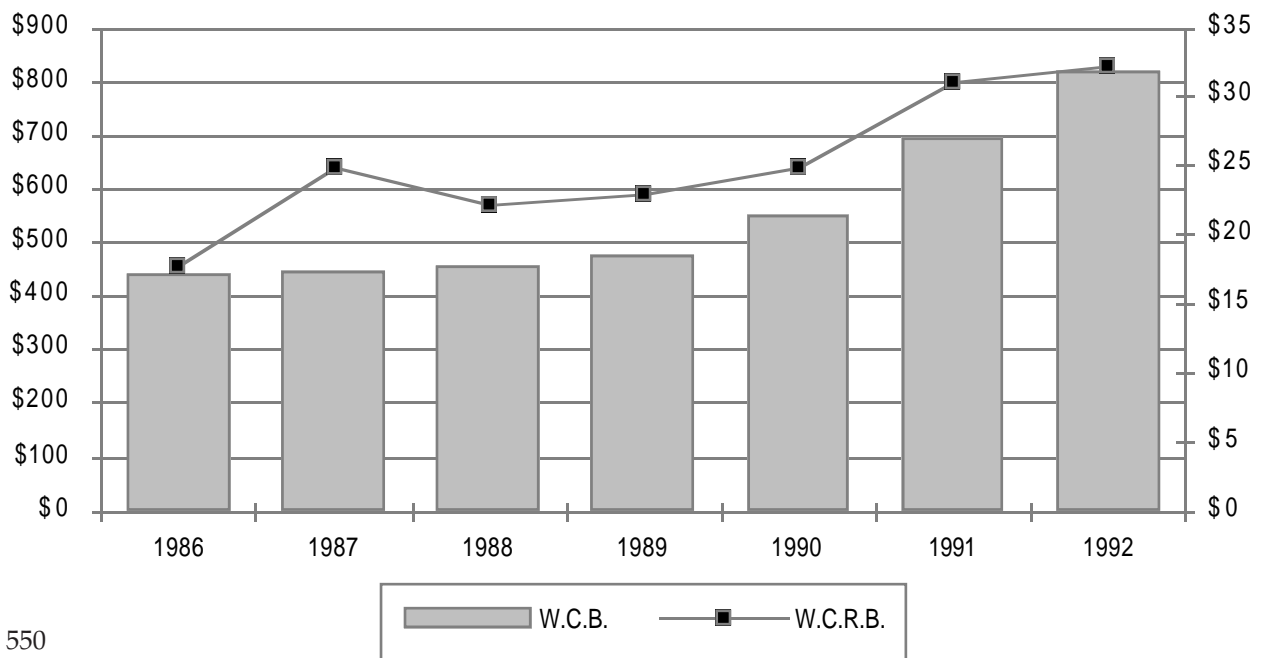


Table 8.10 — Assessments Costs of W.C.B., 1982–1992

	1982	1983	1984	1985	1986	1987*	1988*	1989	1990	1991	1992
Number of Employers	77,534	82,723	85,155	86,940	89,808	94,074	98,523	103,515	106,088	109,106	112,525
Maximum Wage Rate	\$24,700	\$26,182	\$26,182	\$26,182	\$30,000	\$35,000	\$41,300	\$42,200	\$43,400	\$45,800	\$48,000
Assessable Payrolls (\$000,000)	\$15,876	\$16,016	\$16,244	\$16,764	\$18,481	\$20,912	\$23,755	\$26,531	\$28,676	\$29,825	\$34,256
Assessments (\$000,000)	\$428	\$450	\$451	\$464	\$405	\$312	\$409	\$473	\$500	\$544	\$643
Average Assessment Rate (\$ per 100)	\$2.70	\$2.81	2.78	\$2.77	\$2.19	\$1.49	\$1.72	\$1.78	\$1.74	\$1.94	\$2.02
Assessments per Employed Worker	\$356	\$378	\$379	\$381	\$319	\$239	\$301	\$330	\$340	\$366	\$424

SOURCE: Workers' Compensation Board

* Special assessment abatements of \$99 million and \$15 million respectively were granted in 1987 and 1988.

All numbers are obtained from W.C.B. annual reports — Assessable Payrolls, except the following:

Assessments per employed worker = assessments (in 000,000) / average employment rate (in Table 8.1)

1992 assessment rate (\$ per 100) from the W.C.B.'s Assessment Department

Table 8.11 — Average Assessment Rate, Canada, 1989–1993

Province	Average Assessment Rate per \$100 Payroll				
	1989	1990	1991	1992	1993*
British Columbia	\$1.77	\$1.79	\$1.93	\$2.02	\$2.16
Alberta	1.75	1.90	1.98	1.98	2.04
Manitoba	2.25	2.23	2.30	2.16	2.16
New Brunswick	1.88	1.94	2.04	2.13	2.19
Newfoundland & Labrador	2.31	2.50	3.00	3.00*	3.23
Northwest Territories	2.35	2.47	2.43	2.29	2.56
Nova Scotia	1.34	1.47	1.66	1.98	2.28
Ontario	3.12	3.18	3.18	3.16	2.95
Prince Edward Island	1.57	1.60	1.80	2.00	2.22
Quebec	2.68	2.50	2.32	2.50*	2.75
Saskatchewan	1.58	1.62	1.60	1.60	1.64
Yukon	1.79	1.65	1.62	1.61	1.61

SOURCE: Association of Workers' Compensation Boards of Canada Data

* Rates estimated

Table 8.12 — Paylag by Adjudicating Unit, 1991–1992

	Paylag Standard %	1991 %	1992 %
Richmond			
Unit 1	40.0	38.0	32.0
Unit 2	40.0	39.6	32.8
Unit 3	40.0	36.3	31.5
Unit 4	40.0	35.6	31.9
Unit 5	40.0	37.4	33.3
Unit 9	65.0	49.7	57.2
Special Unit	8.8	11.3	
Area Offices			
Nanaimo	50.0	50.3	49.2
Prince George	50.0	63.4	63.9
Cranbrook	50.0	73.1	72.4
Vernon	50.0	61.4	54.8
Nelson	50.0	56.0	56.1
Terrace	50.0	52.5	54.7
Kamloops	50.0	58.2	58.9
Victoria	50.0	53.4	56.6
Courtenay	50.0	69.0	65.5
Total All Offices (Avg.)		45.3	44.7

SOURCE: Workers' Compensation Board Paylag Report, Compensation Services

NOTES:

Figures are obtained from the Paylag report — Compensation Services

Using the % year-to-date column in the December 1991 and 1992 report



Terms of Reference for the Employer Assessment Classification Committee

Date: February 4, 1994

Editors' note: In the last issue of the Reporter, these Terms of Reference were mistakenly printed on green (Appeal Division) letterhead. To correct this error, we have reprinted this section on pink letterhead (miscellaneous) for your convenience.

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Introduction

The Employer Assessment Classification System operates to determine the rate at which each employer must contribute toward maintaining the accident fund.

The Classification System is based on the principle that the cost of producing a product or providing a service includes the cost of injuries or diseases incurred by the workers producing the product or providing the service. The Classification System is therefore constructed on the basis of industrial undertaking rather than on an occupational or hazard basis. In other words, if a specific product were being manufactured, the classification would be the same regardless of the process used in its manufacture, or whether the manufacturing was done by the employer's workers or subcontracted out to another firm. An industrial classification therefore includes all occupations within the industry including office or clerical staff. One method of classifying firms would be to establish only one group in which all employers are classified, regardless of their industrial undertaking. In this way, every employer would pay the same assessment rate and all would share in the total cost of administering the *Act*. This is the pure collective liability theory of assessment; but assessing very high cost industries at the same rate as low cost industries is considered undesirable.

B.C., along with other jurisdictions in Canada, has chosen to create self-sufficient groups of employers on the basis of the industries in which they operate. In establishing these groups, the size is of critical importance. Since one serious injury can cost in excess of \$1 million, it is apparent that the size of the group must be large enough to provide for an adequate spread of the risk and stability in the assessment rate.

Not all industrial classifications are large enough to stand alone; they must be grouped together to provide an adequate insurance base. This grouping is done on the basis of industry similarity and an experienced cost similarity. Therefore, while there are separate classifications for very small industrial groups to provide statistical data, each industrial group does not necessarily stand alone but will be grouped with others based on industry and cost similarity, if necessary.

These two factors, classification by industry and forming a group large enough to be a valid insurance base, are the basis of the Classification System.

Current Organization and Function of the Employer Assessment Classification Committee

The Employer Assessment Classification Committee currently functions as an ad hoc committee. It is composed of:

Director of Assessments

Manager, Assessment Policy

Manager, Employer Assessment

Manager, Assessment Services

Manager, Systems Development and Operations Support

Manager, Assessment Training

Manager, Employer Registration

The committee meets as needed to review the appropriate classification of employers within the framework of the Employer Assessment Classification System. Decisions of the committee that may affect more than one employer are expressed in documents called Classification Committee Minutes (C.C.M.'s). C.C.M.'s are used by Assessment staff as reference documents to assist in determining the appropriate classifications of employers.

In some cases, the committee meets as a result of requests for Managers' or Directors' Reviews of classification issues under appeal.

Need for Terms of Reference

The Executive Committee of the Board has requested that all standing committees within the Board be governed by Terms of Reference. With formalization, the Employer Assessment Classification Committee would be officially recognized.

The following report recommends Terms of Reference relative to the mission, structure, protocol and responsibilities of the Employer Assessment Classification Committee.

Mission, Goals and Principles

Mission Statement

The mission of the Employer Assessment Classification Committee is to investigate, consider and otherwise review *precedent setting matters* and *individual employer disputes* pertaining to the appropriate classification of employers within the Employer Assessment Classification System. Precedent setting matters include, but are not limited to: defining new industries, re-defining existing industries and clarifying existing definitions of industries.

Goals

The overall goal of the committee is to make fair, reasonable, equitable and timely decisions on the interpretation and application of the Employer Assessment Classification System. The decisions of the committee will promote equity among employers while supporting the stability of the modified collective liability principle upon which the Employer Assessment Classification System is based.

In making its decisions, the committee will consider the general guidelines of determining industrial classification. These guidelines include, but are not limited to:

The overall purpose of the business or industry, based on industrial undertaking not occupational hazards;

The product or service is manufactured or delivered;

The materials, resources, equipment and processes used in the manufacture or service delivery;

The business' or industry's competitors and customers;

Appropriate Board of Governors' Assessment Operating Policy.

The secondary goal of the committee is to make recommendations relative to the structure and composition of the classes and subclasses identified within the Industrial Classification System.

The committee will also conduct an annual review of the *Classification and Rate List* for adoption by the Board of Governors as published policy.

Structure

Composition

The committee's mission statement and goals primarily support the orderly and equitable collection of employer assessments. The management of the Assessment Department possesses recognized expertise and experience in examining matters of employer classification. As such, the committee should consist primarily of Assessment management staff with direct operational responsibility. Representation from other divisions is important to provide a broader perspective and experience as well as facilitating a faster interdivisional appreciation of the issues.

To facilitate timely, informed decisions, the standing membership of the Employer Assessment Classification Committee should specifically include:

the vice-president, Financial Services;

the director, Assessments;

the manager, Employer Assessment;

the manager, Assessment Services;

the manager, Registrations

the manager, Assessment Policy

a director or a senior manager designated by the vice-president, Prevention;

a director or a senior manager designated by the vice-president, Compensation Services.

All members should be appointed to the committee for a term of at least a year to ensure efficiency and continuity of decision making.

Chair: Vice-President, Financial Services

Secretary: Manager, Assessment Policy

Protocol

The Classification Committee will set its own operating protocol consistent with the following operating principles.

1. Committee meetings should be convened by the secretary on an as-needed basis.
2. The Agenda and any supporting materials should be delivered to each member of the committee no later than three working days prior to the date of the meeting, where practical.
3. The preferred method of decision making should be through consensus.

-
4. Submissions or referrals to the committee should follow a consistent format such as that presented in Appendix A.
 5. Since the committee may be making decisions which are individual in nature or precedent setting in nature, it will need to decide how the Decisions are to be published. For example, precedent setting issues could be distributed as an Appendix to the Policy Manual and may even request that certain Decisions be published in the *Reporter*. Decisions on individual firms may be edited for publication or have limited distribution. A suggested Decision format is presented in Appendix B.
 6. The effect of the Decisions should be to guide staff in classification decisions and to provide a basis for amending the *Classification and Rate List*.
 7. The committee should establish a quorum.
 8. The committee should determine the exclusion of a committee member in those cases where the committee member has previously made a decision on the case at hand.
 9. The vice-president, Finance and Information Services Division, will chair the meetings and determine a substitute for this role in the case of absence.

Referrals

Referrals can be made to the Classification Committee from one of two sources.

1. By Assessment Department staff through the manager, Employer Assessment; manager, Assessment Services; director of Assessments; or vice-president, Finance and Information Services Division.
2. At the request of any person after a review by the director of Assessments has been completed and communicated to the firm.

Appeals

Appeals to the decisions made by the Classification Committee will follow normal protocol for decisions made by a department.

Responsibilities

1. The committee will investigate, consider and otherwise review matters pertaining to the appropriate classification of employers within the Employer Assessment Classification System.
2. The committee will make recommendations regarding additions, deletions or significant changes to the class and subclass structure of the Employer Assessment Classification System.
3. The committee will review, amend, and submit annually, to the Board of Governors, a *Classification and Rate List* to be adopted as published policy.
4. Decisions and recommendations of the committee should:
 - be achieved through participation and consensus;
 - maintain the principle of modified collective liability within the Industrial Classification System;
 - be respectful of maintaining equity among employers in a competitive position;
 - be based on information that is as complete and detailed as is reasonably possible; and,
 - be expressed in plain language that is technically competent yet easily understood.
5. The committee should observe and be guided by:
 - the *Workers Compensation Act* of British Columbia and its regulations;
 - the governors' published policy.
6. The chair of the committee will be responsible for conducting meetings.
7. The secretary will be responsible for calling meetings, distributing submissions, preparing the decisions and ensuring published decisions of the committee conform to the accepted standard.

Appendix A

Recommended Format for Submissions to the Employer Assessment Classification Committee

The recommended format is a single page, double-sided “form.” Side one is shown below.

WORKERS’ COMPENSATION BOARD OF BRITISH COLUMBIA

Employer Assessment Classification Committee Submission

Submission Sponsor

Introduction *(Describe the background, cause or source of the submission.)*

Issues *(State and explain each issue involved.)*

- 1.
- 2.
- 3.
- 4.
- 5.

References *(Indicate any legislative, policy, C.C.M., C.C.D., or other references.)*

Attach any supporting documentation.

Side two of the form is shown here.

Alternatives *(Identify and explain all alternatives to resolve the issue(s).)*

- 1.
- 2.
- 3.

Recommendation *(Indicate your recommended solution to the issue(s).)*

Decision of the Committee

Action Plan *(Indicate what action/tasks are to be done, by whom and when.)*

Attach any supporting documentation.

Appendix B

Recommended Format for Classification Committee Decisions

EMPLOYER ASSESSMENT CLASSIFICATION COMMITTEE DECISION (C.C.D.)		
DATE:	<i>Date C.C.D. was prepared or revised</i>	DECISION NUMBER:
SUBJECT:	<i>Title of Minute</i>	
REFERENCES:	<i>Titles and Item Numbers of any previous C.C.M.'s or C.C.D.'s referenced in this Decision</i>	
Introduction		
Background information which precipitated the Employer Assessment Classification Committee decision expressed in the C.C.D.		
Issue		
Description of the issue(s) involved.		
Alternatives		
Description of the alternative(s) considered.		
Decision		
Description of the decision of the committee.		
Rationale		
Explanation of the rationale for the decision.		
Attendees		
List names and positions of the committee members who attended the meeting.		