



# EHS Magazine Discussions of Leading and Lagging Indicators and OSHA

Insights

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Last Week, Sandy Smith, Editor in Chief of EHS Magazine, interviewed me for two articles she prepared on the continued difficulties presented as employers struggle to rely on leading indicators to manage safety rather than relying on workplace injury data – “lagging indicators.” I enjoyed the interview because Sandy knows her stuff, and EHS Magazine is committed to making a difference in the safety culture. Please review my following points, and then enjoy her two articles, [Leading and Lagging Indicators and OSHA](#) and [“Survey Offers a Glimpse Into the Safety Practices of General Contractors.”](#) We will talk on additional findings from our F & P Survey in future articles and posts, focusing on different perspectives and aspects of the subject... and there certainly are plenty of issues and action points! Thanks for your interest in these important subjects.

- At the beginning of 2013, employers widely accepted the following statements as an accurate summary of the status of using workplace injury and illness data to manage safety processes...
- OSHA is opposed to Safety Incentive Programs which are based on injury and illness rates because they believe that such programs discourage employees from reporting workplace injuries.
- After dozens of six-figure awards, OSHA has made it clear that it views discipline for violating safety rules as often being a pretext for retaliation against employees who reported workplace injuries.
- Simultaneously, employers are concerned about customers who evaluate contractor safety performance based on workplace injury rates, which focus on failures (“lagging indicators”) rather than the “leading indicators” which predict the effectiveness of safety programs.
- Both OSHA and many experienced employers agree that employers should increasingly focus on “leading indicators” and “behavioral” factors that may prevent accidents.
- Unfortunately, despite this belief, most employers, to some extent continue to evaluate safety programs based on injuries (“rate-driven”) and/or base incentives on injury rates.
- Part of the problem is that there is no consensus as to which leading indicators should consistently be evaluated.

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