



SAFETY AND HUMAN RESOURCES REVIEW OF THE PETERSBURG BOROUGH

Barbara Thurston, APEI Executive Director
Carleen Mitchell, Deputy Director
Cole Cummins, Loss Control Manager

September 2023

Table of Contents

Executive Summary.....	3
Borough-wide Observations and Recommendations	4
New Employee Orientation and Onboarding.....	4
Management Training	6
Personnel Policy Manual and Safety Manual.....	7
Safety Committee.....	8
Safety Officer.....	9
Vehicle Safety and Driving Policies	9
General Safety Practices	11
Incident investigation	12
Human Resources Management	13
Reasonable Accommodation under the Americans with Disabilities Act (ADA)	16
Training documentation	18
Specific Observations and Safety Suggestions by Department	19
Community Development Department.....	19
Fire Department.....	19
Finance.....	20
Harbor department.....	21
Library.....	21
Mountainview Manor	22
Parks and Recreation.....	23
Police.....	23
Public Works, Sanitation, and Motor Pool.....	24
Water and Wastewater/Power and Light.....	25
Ways in which APEI can support the Borough.....	26
Employee Training.....	26
Human Resources Consultation.....	26
Safety Support.....	26
Loss Control Manual.....	27
Legal Fee Reimbursement	27

Crisis support..... 27
Additional Resources28
 Human resource management, employment law, policy samples:28
 Americans with Disabilities Act (ADA) and reasonable accommodation:28
 Workplace safety:.....28

Executive Summary

APEI was appointed by the Petersburg Borough assembly on June 5, 2023, to complete a review of the borough's practices regarding safety and human resources.

This review was prompted by community concerns following the crash of a Borough vehicle on July 4, 2016, which resulted in the death of two Borough employees and injuries to two others. Concerns have been expressed regarding the safety practices in place in the Borough and the procedures followed in the hiring, training, and evaluation of their employees, particularly in areas related to safety.

In response, and in an attempt to prevent another incident like the one on July 4, 2016, the Assembly engaged APEI to complete a review of the Borough's current practices.

It is important to note that this review is not an investigation of the circumstances leading up to and following the 2016 crash. We have not attempted to ascertain exactly what may have caused or what could have prevented the crash. Our goal with this review is to develop an understanding of the practices currently in place and make recommendations as to how those could be improved to increase the safety of Borough employees and the public.

In our review, we noted a number of areas where the Borough is doing well, and others where we feel that changes will help to make the Petersburg Borough a safer place to live and work. We encourage the Borough to continuously review their processes to identify any changes that can be made to improve further.

Process

Soon after the Petersburg Borough Assembly engaged APEI for this review, we received copies of the Borough's Personnel Policy Manual, Safety Manual and various other documents pertaining to hiring and personnel policies. APEI staff reviewed these documents to get a sense of what policies the Borough at least intends to follow in their operations.

Three APEI staff members visited Petersburg on August 15 and 16 and interviewed management, employees, assembly members, and community members. Participating APEI staff included Barbara Thurston, Executive Director; Carleen Mitchell, Deputy Director and HR Specialist; and Cole Cummins, Loss Control Manager.

The Assembly had requested that Borough staff have an opportunity to submit their comments and observations to APEI. To that end, we established a dedicated email account (comments@akpei.com) to which people were invited to send their input. Our understanding is that information about our visit and how to submit comments was circulated to department heads, who were asked to disseminate the information to their staff. While APEI committed to treating the comments we received as confidential, we are not certain that information about the confidentiality was communicated to all staff. We are also not certain that all staff received information about how to submit comments to us.

We received comments from about 40 employees and/or members of the public. While most of the comments were urging us to carry out an investigation of the July 4, 2016 vehicle crash, a few provided information about current practices. Each of these was read and acknowledged, and relevant information was noted so it could be considered in our review.

Cole, Carleen, and Barbara each talked to different Borough staff, Assembly members, and/or members of the public during and following their visit to Petersburg. We then shared our notes to help identify areas of particular concern and to compare the information received from the different parties.

Borough-wide Observations and Recommendations

Our review of Borough documents and our subsequent interviews with Borough staff identified several issues affecting all departments where we have recommendations for improvements. Department-specific recommendations are noted later in this document.

At the end of this report, we have listed resources that could be helpful to the Borough in addressing many of our recommendations. These resources can provide Borough staff access to many valuable tools including training opportunities, sample policies, handbooks, suggestions on how to address particular personnel issues, and important employment laws.

New Employee Orientation and Onboarding

A key to a successful employer/employee relationship is clear communication about job duties and expectations from the very beginning of employment. Organizations with a robust new employee orientation and onboarding program often see greater employee engagement, less turnover, and stronger commitment to safety and best practices.

Current Practice

In conversations both with the HR department and with the various department heads, there was a general consensus that the current orientation process includes the following:

- New employees meet with HR to complete new hire paperwork.
- HR provides new employees with a copy of the Personnel Policy Manual and has the employee complete a form acknowledging receipt of and their responsibility to review the manual.
- HR provides general information about paid time off, union membership, and employee benefits.
- The employee is referred to their department head for the remainder of the orientation. The department head reviews the job description with the employee, both sign off on the review and then send the signed job description to HR to include in the personnel file.
- Department heads are responsible for developing and providing the remainder of the new employee orientation and onboarding. This includes the responsibility for determining what safety training is needed, providing that training, and recording that the training has been completed.

Mountain View Manor and the Petersburg Police Department appear to have robust orientation programs for their employees as would be expected and are appropriate for the types of services provided by those departments. Other departments' orientation programs appeared to be less formal and undocumented.

APEI Recommendations

APEI recommends that the borough create a formal **orientation** program for all new hires and then work with department heads to create department specific orientation programs. This orientation program would include:

- Checklists of key training and topics that are assigned to all staff. This would likely include topics such as vehicle safety and harassment and discrimination prevention;
- Training and topics to be reviewed at the department level, including department-specific safety topics, use of PPE, and instruction on how to do a particular job; and

- A system for documenting that the orientation steps have been completed as topics are covered and training is provided.

Ideally, all training and topics would be covered within the first few weeks of employment.

Beyond developing a formal orientation program, department heads and other supervisors should be provided with guidance for **onboarding** new employees. While employee orientation can be guided by a checklist of items to complete, onboarding is a longer-term process involving the provision of regular, documented feedback to new employees as they grow into their position. Depending on the complexity of a position, onboarding is a process that typically takes 3-18 months.

Onboarding is a key component in employee success as it ensures employees are made aware of potential concerns about their job performance early and often. Should an employee's performance not meet expectations, regular feedback provided during onboarding paves the way for addressing concerns more formally and in a way that will support the borough's decisions and actions.

For supervisors and managers new to their position, orientation should include being provided with information about their supervisees regarding any accommodations that are in place for an employee and any existing performance improvement plans or performance concerns that are actively being addressed. This will allow the new supervisor to continue to follow up on these personnel actions as appropriate.

It's recommended that department heads be evaluated on the effectiveness of their orientation and onboarding practices as part of their annual evaluation.

Management Training

It is important to have an ongoing management training program for all supervisors and managers. For new managers in particular, it is common to have been promoted into a supervisory position because of their skills or experience at a lower-level position, but, too often, these employees receive little training in how to be an effective supervisor. This lack of training can lead to ineffective operations and overlooked safety protocols.

Current Practice

While Petersburg provides management training, it is somewhat haphazard and not consistent among all departments and levels of management. APEI visited Petersburg in February 2023 and in 2019 to provide management training and the Borough has

recently started holding a monthly department head meeting with the City Manager and all Department Heads.

APEI Recommendation

The borough should develop a checklist of key topics and training to be provided to all first-time managers, and periodically to more experienced managers. This may include:

- Borough policies regarding employee discipline and termination
- Training on documenting employee feedback, performance, and evaluations
- Key employment laws such as, ADA, FMLA/AFLA and workers' compensation
- Collective bargaining agreements

Personnel Policy Manual and Safety Manual

Current Practice

The Borough's Personnel Policy Manual is dated May 2019, though it appears to be much older with many dated references. The fact that these documents are old does not necessarily mean that the information in them is inaccurate, although the lack of a regular update indicates that new developments in safety or employment law may not be incorporated. Additionally, at 110 pages long it is very cumbersome and is unlikely to be read by staff.

The Borough has drafted a revised version of the Personnel Policy Manual, but it has not yet been finalized.

The Borough's Safety Manual is very extensive and covers the majority of the safety hazards that Borough employees are faced with. However, though it doesn't have a date identifying when it was created, it appears to have been adopted sometime before 2012. While many of the components within the manual are still compliant and up to date with today's current safety standards, some areas of the safety manual are clearly out of date and need to be updated.

APEI Recommendation

We recommend that Petersburg replace their current Personnel Policy Manual with two resources:

- An **Employee Handbook** that is short enough that it is realistic to expect all staff to read it. We recommend that an overview of the key items in the handbook be discussed with new employees as part of the orientation process.

- A **Policy Manual** that gives details on Borough policies on a variety of topics. This Policy Manual can be referenced in the Employee Handbook as needed so employees know where to look for more specifics on a given topic.

We recommend that the Borough develop a plan to periodically review both the Policy Manual and the Safety Manual on a rotating basis to ensure they remain relevant. Consider reviewing one policy per month and, even if the review results in few or no updates, note that the review was completed.

One specific and significant section in the Safety Manual that requires an update is the section on Hazard Communication, as OSHA has made substantial changes to the standard since 2012. Recent OSHA changes include chemical hazard classifications, new container labeling requirements, as well as updated safety data sheets. Employees must be trained in these new changes to the Hazard Communication Standard and be aware of the chemicals they may be exposed to on the job.

Where possible, departmental safety and procedure manuals should be incorporated into the Borough's general Safety Manual, so that everyone is aware they exist and to ensure departmental procedures are consistent with the overall Borough policies. Where a department's manual is a specialized technical document that has been obtained from an outside source, it may be appropriate to incorporate it in the Borough manual by reference rather than in its entirety. Regardless of their locations, departmental manuals should be regularly reviewed by a team of management and staff, and changes adopted as appropriate.

Each of these manuals should be prominently placed on the Borough's website for easy reference.

Safety Committee

Current Practice

It is our understanding that the Petersburg Borough does not currently have a safety committee and has not had one in many years. Safety committees are a critical part of an organization's safety culture because they provide an organized opportunity for employees and management to review and discuss safety issues and to implement changes as needed.

APEI Recommendation

The Borough should establish a safety committee to assess the work environment for risks and implement changes to improve safety throughout the borough. Effective

safety committees typically include 5-10 members, representing management and employees from departments across the organization, and meet at least quarterly. For the first year after creation, we recommend that a safety committee meet at least monthly as a way to get into a routine of thinking about safety and addressing issues. APEI can provide the Borough with support in setting up the committee and in setting the agenda for the first few meetings.

We recommend that the Assembly ask the Safety Committee to provide periodic updates to them about the committee's activities and actions.

Safety Officer

Current Practice

The Safety Manual references the Borough having a safety officer, but it appears that no such officer has been appointed. Several department heads that we spoke with expressed their belief that a Safety Officer would help improve safety in the Borough.

APEI Recommendation

In large organizations, a Safety Officer is an important part of the organization's safety culture because the person in that position is able to focus on safety issues rather than another job. In a community the size of Petersburg, a dedicated full-time Safety Officer may be impractical, but we do recommend that an individual be identified for this role. We see this individual serving as the point person for safety information and responsible for coordinating safety improvement efforts.

If the Borough elects to not identify an individual as an official safety officer, then the Borough policies referencing that position should be amended to identify another person responsible for those particular tasks.

Vehicle Safety and Driving Policies

Current Practice

Many departments at the Borough have vehicles or have staff that drive occasionally for Borough business. Current Borough policies do not include a specific driving policy; however, a number of topics pertaining to driving are mentioned throughout the Personnel Policy Manual. These include:

- Prohibited use of a cell phone while driving for Borough business
- Drug and alcohol testing programs, including reasonable suspicion procedures

- Requirement to report to a supervisor that one’s medication use may affect the ability to safely and effectively perform job duties
- Vehicle maintenance and safe operation

APEI staff received reports that Borough staff are occasionally asked to drive a vehicle of a type that is unfamiliar to them, with little or no training being provided.

We spoke with HR regarding any policies which define limitations for job applicants pursuing a position with driving duties who may have a previous driving-related conviction that may make them ineligible for a driving position (DUI, reckless driving convictions etc.). Staff explained that there is not a specific policy, but for positions that require a Commercial Driver’s License (CDL), such convictions would appear in the Federal Motor Carrier Safety Administration (FMCSA) database and make an individual ineligible.

For staff operating vehicles for which a CDL is not required, Borough staff explained that any employee driving restrictions resulting from infractions or violations is “taken into consideration” in hiring or in assigning job duties. It is not clear what this means or that it is applied consistently for all employees.

APEI reviewed the documentation for tracking required drug and alcohol testing for drivers who fall under Federal Motor Carrier Safety Administration (FMCSA) rules. This documentation was comprehensive and indicates that the borough has excellent practices in place to ensure they meet their obligations for drug and alcohol testing (pre-employment, random, post-accident, reasonable suspicion) for these drivers. Others with driving responsibilities who do not fall under FMCSA rules are subject to reasonable suspicion and post-accident testing.

APEI Recommendation

The Borough should consider developing a comprehensive Vehicle Safety Policy to address safe vehicle operation throughout the Borough. Doing so would create a single document that could easily be reviewed with any employee with driving responsibilities to ensure they are aware of their obligations for safe vehicle operation. Sample language for a vehicle policy is available from SHRM (*Use of Company Vehicles Policy* and *Company Fleet Usage and Driver Safety Policy*) which the borough can use to guide their policy development.

The current Drug and Alcohol Policy includes a list of prohibited conduct which includes the following statement: “*Failing to notify an employee’s supervisor before beginning work that the employee is taking medications or drugs which may interfere with the*

safe and effective performance of duties.” We did not see a similar statement in the draft revised Personnel Policy Manual.

- We recommend that a statement similar to the above be included in both an Employee Handbook and the Vehicle Safety policy.
- In addition, the statement should be expanded to include a requirement that employees must notify their supervisor of any other situation or condition (loss of driver’s license, medical condition, or diagnosis) which may affect the employee’s ability to legally or safely operate a vehicle.

We recommend that any staff member who is expected to drive on the job, including employees who drive their own vehicles, be required to periodically take a defensive/distracted driving or other vehicle operation safety course. In addition, before being asked to drive a type of vehicle (including pulling a trailer) that is unfamiliar to an employee, the employee be required to spend some time in a check ride with an experienced driver to develop a familiarity with the vehicle. This practice driving should be documented and included in the employee’s personnel file.

We recommend that the Borough develop clear policies stating which motor vehicle violations would make an individual ineligible for a position and for how long (e.g., 3 years following the conviction). This will provide clear guidelines for hiring managers and prevent any appearance of bias through inconsistent hiring practices.

We recommend the Borough review all driving positions not subject to FMCSA requirements and consider if any should be subject to similar testing as those who fall under FMCSA. This may include, for example, any employees who provide transportation to members of the public.

General Safety Practices

Current Practices

During the interview process with department directors and HR, APEI identified many positive safety attributes that were noticeable throughout the borough. It was clear that department heads were involved with staff in discussing injuries, hazards, and other safety concerns within their departments. Department heads also actively engage with their employees when injuries do occur and work to investigate the reason for the incident.

Each department director was clear that employee safety was important to them and their staff. Most of the departments have readily available personal protective

equipment (PPE) with a specific line item in their budgets for safety items. When employees need PPE, it is available and at no cost to them.

Conducting safety **assessments** of hazards throughout the borough is of vital importance to help keep employees safe. We have not been able to identify any safety assessments that have recently been completed by Borough departments.

APEI Recommendations

APEI recommends that the borough utilize the following types of safety assessments. These should be completed in each department where hazards are present or are likely to be present.

- The first assessment that APEI recommends is the **Hazard Assessment and Certification for PPE**. This is an assessment that looks at hazards that an employee may face in the workplace, and then identifies the required Personal Protective Equipment (PPE) they need to keep themselves safe. This type of assessment is required by OSHA to identify if PPE is needed and to assure that employees receive training on the equipment that they are using.
- The second assessment that APEI recommends is a **Job Safety Analysis (JSA)**. This assessment tool helps break down each job task into specific steps, identifies potential hazards associated with those tasks, and then helps coach the employee on how to avoid those hazards. A JSA is a great tool to ensure consistent and safe work methods are being followed on each hazardous job task.

Incident investigation

An incident investigation is a thorough examination of an incident's circumstances to identify its root cause(s) and develop recommendations to prevent a similar occurrence. Investigating accidents and incidents is necessary for preventing future incidents and legal and regulatory compliance.

Investigating a worksite incident – a fatality, injury, illness, or a near-miss – provides employers and workers the opportunity to identify hazards in their operations and shortcomings in their safety and health programs. Most importantly, it enables employers and workers to identify and implement the corrective actions necessary to prevent future incidents.

Current Practice

The Borough's Safety Manual has a section on incident reporting, which gives parameters on who is to be notified of an incident, which incidents must be reported and investigated, and which forms get filled out.

When we asked staff about incident investigations, we received a range of answers, and it isn't clear that everyone is familiar with the policy or that it is consistently followed. The criteria in the Policy used to identify incidents required to be investigated are inconsistent and difficult to follow.

APEI Recommendation

The Borough should update and revise their incident investigation policy to reflect Borough needs and practices and to clarify the requirements. Specifically, a revised *Incident Investigation Policy* should include:

- A description of who is responsible for doing an investigation;
- A plan for providing training in how to handle incident investigations, and responsibility for ensuring that training occurs;
- Clear criteria about which types of incidents require a formal investigation and those for which a simple incident report is sufficient; and
- Information about how the results of the investigation are to be used and shared.

Human Resources Management

Current Practices

In reviewing the Borough's **hiring practices**, we found the Human Resources Department's hiring process to be thorough and well documented. Of particular note:

- Job descriptions are reviewed prior to posting advertisements for any new positions.
- Job applications are required from all candidates, ensuring consistency in the information being submitted.
- HR participates in all job interviews, which ensures that legally compliant interview techniques are being used.
- Reference checks are completed on all applicants for Borough positions. In addition to checking with references provided by the applicant, Borough staff will

also reach out to prior employers, or others in the community for additional perspectives.

- Driver's license checks are completed on all new hires who have identified that they have a driver's license, regardless of whether or not driving is a regular part of their job duties. For those who do have regular driving duties, drivers' licenses are re-checked annually.

The Borough provided APEI with sample job descriptions to review, and others were available for our review on the Borough's website under job postings. The Borough's **job descriptions** are well-written and provide a clear description of the working conditions one can expect to encounter in each position, including the primary physical demands, a description of the working environment, and potential hazards. The minimum requirements appeared to be thorough and reasonable for the descriptions we reviewed.

The Borough performed a review of all job descriptions following the July 2016 vehicle crash to ensure that a complete list of job duties was reflected in each position. This included a careful review to specifically identify positions which have driving-related duties. If an employee experiences a disability, having the position description include a complete list of the duties will allow for an accurate assessment through the interactive process used to determine appropriate accommodations.

We reviewed the Borough's **performance evaluation** process, and the existing Employee Evaluation Form.

The Borough has been working on improving their performance evaluation process and is taking concrete steps to have a more effective employee evaluation program. This includes updating the evaluation form and the purchase of copies of the book, *"2600 Phrases for Effective Performance Reviews"* to be provided to all department heads. This is an excellent resource that will allow department heads to use more effective language in their evaluations.

Newly hired employees have a 6-month probationary period in which a written evaluation is given at the 3- and 6-month mark as is required by the collective bargaining agreement. APEI confirmed that timely emails are sent to department heads by HR reminding supervisors of their obligation to provide this feedback and evaluation. If a later decision is made to not retain an employee at the end of their probationary period, the Borough has the documentation needed to support that action.

We inquired about the evaluation process for newly promoted employees. It was noted that the Borough currently does not have a process for providing interim evaluations in this situation, and that the collective bargaining agreement states that if an employee promotion does not work out, the employee is to be transferred back to their prior position.

APEI Recommendation

We would like to make the following recommendations:

- Job descriptions where a regular driver’s license is required reference an “insurable driver's license”. We recommend that the word “insurable” be removed and consider replacing it with a more specific criteria (such as “with no more than XX points assigned against their license by DMV”).
- The performance evaluation form includes a space for *Goals*. The form should also include a place for *Training Objectives*. We recommend that goals and training objectives are listed in the end-of-probation evaluations as well as in the annual evaluation.

Ongoing training is a valuable tool to advance employee performance, reiterate safety objectives, keep employee skills relevant, and identify cross-training needed in the department. The annual evaluation is the ideal time to speak with an employee about their professional development goals as well as what the borough needs from the employee to ensure all objectives are being met.

- The criteria for each rating (*Needs Improvement*, *Meets Expectations*, and *Exceeds Expectations*) are not clearly defined and supervisors may not know how to apply these terms. The Borough should provide more detail on the form as to what level of performance must be met to achieve each rating. APEI has resources available to assist the Borough with clarifying these definitions. Doing so will help employees to better understand the level of expectations necessary for each rating.
- As part of each annual performance appraisal process, the supervisor and employee should review the position description together to ensure the job duties still accurately reflect the work being done and the expectations placed on the employee.
- We recommend that the Borough adopt a process similar to that used for new employees for providing feedback to a newly promoted employee during an introductory period so that if the decision is made to demote the employee, there is documentation of feedback that will support the eventual decision.

Reasonable Accommodation under the Americans with Disabilities Act (ADA)

Current Practice

We inquired about the Borough's practices for reviewing requests for and providing reasonable accommodation to qualified individuals with a disability. The HR department indicated that such accommodation requests are very infrequent and are overseen by the HR department in consultation with the employee's supervisor and department head and as needed, the Borough attorney.

When a request for accommodation is received, the ADA requires that the employer engage the employee in an interactive process to determine the appropriate accommodation. The Borough meets this requirement, and HR reviews each of the employee's job duties with the department head and employee. This allows for a determination of any possible limitations imposed by the employee's disability that the employee may not have considered and identify possible accommodations.

Documentation of the interactive process at the Borough was described as involving a series of emails back and forth between those participating in the process along with notes being made on the job description of agreed-upon accommodations.

APEI Recommendation

We recommend that the Borough formalize their documentation of the interactive process to include the following:

- A list of who was involved in the interactive process;
- A description of which essential job functions are impacted by the employee's disability;
- If documentation has been requested from the employee's medical provider, when the request was made, and when the documentation is requested by, and a copy of the documentation once it's received;
- An estimate of how long the accommodation is anticipated to be needed and dates for following up with the employee to evaluate the effectiveness of the accommodation or any changes that need to be made; and
- Information about other individuals that may need to be informed about the accommodation and how that information is to be shared. This last step is essential when an accommodation provided to an employee affects safety or the operations of the Borough.

We recommend that all managers receive training on the ADA interactive process so they will be prepared to address a request or identified need for reasonable accommodation. This is critically important to ensure the safety of employees and the public, that Borough functions operate successfully, and to protect the Borough from the possibility of lawsuits. Training is available from APEI and through Lexipol; additional resources to guide managers through the interactive process are listed at the end of this report.

Additional information

APEI receives many questions from our members about accommodations under the ADA, and it is a topic that many commentors to this review were concerned about. It is important to comply with the law and to provide qualified employees with a disability with accommodation that will allow them to be successful in their jobs. While an employer can deny a request for accommodation if the request would impose an undue hardship, the bar for meeting these criteria is very high and a request for accommodation should not be denied without consultation with your attorney.

Employers are often concerned about preserving employee privacy and what information they are allowed to request of the employee and to share with other employees. Some guidelines for the Borough in relation to these issues are:

- As part of the interactive process, employers may request documentation that is necessary to substantiate that an employee has an ADA-qualified disability and needs the reasonable accommodation requested. The employer cannot ask for unrelated documentation such as complete medical records.
- While the ADA provides exceptions for staff who have a need-to-know basis, employers are generally prohibited from discussing employees' medical information with others, including coworkers or members of the public.
- If an employee is provided with accommodation (due to a disability or for any other reason), other staff may be made aware of the **existence** of that accommodation, however, the employer may not discuss the **reason** for the accommodation with other staff.

During the interactive process, the employer should discuss with the employee what aspects of the accommodation may need to be communicated to others, specifically who those individuals are and how the employee prefers that information to be communicated. For example, if the employee's disability may require a medical response (diabetic, seizure, etc.), coworkers may need to be informed of how to respond. Otherwise, any inquiry by staff about the reasons behind the employee's accommodation should be responded to by simply

explaining that the employer is acting for a legitimate business reason and in compliance with federal and state law.

As always, we encourage our members to seek legal counsel when faced with a complex accommodation issue.

Training documentation

Current Practice

We observed that most departments provide training to staff, however training documentation is not consistently forwarded to HR to include in the employee personnel file.

APEI Recommendation

We recommend copies of all training documentation be included in the personnel file.

Specific Observations and Safety Suggestions by Department

Community Development Department

Observations and strengths

- A police officer will accompany the building inspector when visiting a potentially dangerous property.

Safety Concerns Specific to the Department

- The building inspector is exposed to potentially hazardous environments when he is required to enforce codes while going into dangerous buildings.
- The building inspector is also exposed to potential threats from members of the public who are concerned about him/her being on their property.

APEI Recommendations

- Department staff, particularly the building inspector, should be provided de-escalation and communication skills training.

Fire Department

Observations and strengths

- The Fire Department has a very robust training program along with rigorous checks and balances for which staff can enter buildings, drive vehicles, fight fires, etc.
- All new volunteers receive a background check before they can join.
- All new volunteers receive an orientation packet about the department.
- The Department pays for all volunteer training and certifications and provides extensive training on-site.
- The Department provides an exercise area for their staff.

Safety Concerns specific to the Department

- Fire Department staff are faced with the many hazards of fighting a fire.

- Bloodborne pathogens is another issue that EMTs and other staff face on the job.
- Dealing with members of the public is also an area where staff face potential hazards.
- Falls and lifting injuries are some of the main workplace injuries that staff face.

APEI Recommendations

- APEI has no specific recommendations for the Fire Department but encourages them to make changes as detailed in the overall Borough recommendations above.

Finance

Observations and strengths

- There is a plexiglass barrier between the front desk and the public, to provide a safe distance between department staff and members of the public visiting the building.
- Contract assessors are provided with identification to minimize residents' worries about strangers on their property.

Safety Concerns specific to the Department

- Department staff expressed concern over a lack of familiarity with the Borough's IT services and the protections taken to prevent a cyber-attack or attempted fraudulent impersonation.
- Property assessments are conducted by contractors from out of town, and there is a possibility of residents feeling threatened by a stranger on their property and responding negatively.

APEI Recommendations

- The Borough should review current cyber security standards with their IT provider to verify that the computer system meets current standards.
- All staff, but Finance Department staff in particular, should participate in cyber security training that includes information on phishing attempts and fraudulent impersonation.

Harbor department

Observations and strengths

- Staff are constantly walking the docks to look for safety concerns or hazards throughout the day.
- The Harbor Department has their own training program to help new staff learn the skills necessary to safely work on the water, docks, and around the area of the harbors.

Safety Concerns Specific to the Department

- Working on the waterfront is inherently dangerous.
- Snow removal in the wintertime can be extremely dangerous.
- APEI received reports that Harbor staff do not always wear lifejackets when in a skiff or other boat.
- Skiff use during the night hours is another dangerous activity staff may face.

APEI Recommendations

- The information contained in the new employee training program should be written down and formalized.
- If such a policy does not already exist in the Harbor Department Safety Manual, one should be drafted specifying when employees are required to wear life jackets. This policy should be enforced among all employees.

Library

Observations and strengths

- Library staff receive occasional training from the Police Department on how to deal with difficult members of the public.

Safety Concerns Specific to the Department

- There are some instances where staff work alone during the evening hours.
- There are occasional customers/patrons that become aggressive and threatening to library staff.
- Community members of the public who volunteer at the library do not receive a background check before volunteering.

APEI Recommendations

- APEI recommends having two staff on duty at all times to ensure that staff members are not alone in the event of an emergency.
- Look at installing a panic button at the front desk that directly alerts law enforcement in case of emergencies.
- Consider providing communication and verbal de-escalation training for staff.
- APEI recommends conducting background checks on all volunteers before they start work. This will ensure that they are suitable candidates for volunteering at the library.
- A volunteer orientation should also be developed to outline the duties, limitations, and expectations of volunteers.

Mountainview Manor

Observations and strengths

- Supervisors and staff utilize a robust training platform called Relias for their training needs. This provides at least 10 hours of training per year for each staff member.
- The department head is working on getting CNA training for all interested staff which will be provided by the medical clinic.
- When residents become aggressive or challenging to work with alone, two staff members help with the care of the resident.
- The Manor participates in monthly safety meetings as well as quarterly fire drills.

Safety Concerns Specific to the Department

- Lifting, pulling, and patient handling are the main safety concerns within the Manor.
- Trip hazards, bloodborne pathogens, and resident combativeness are other safety hazards that staff often deal with.

APEI Recommendations

- Recommend conducting a review of how the keys are managed throughout the facility and consider installing an electronic keycard system.

Parks and Recreation

Observations and strengths

- Multiple people reported to us that the current Parks and Recreation director is visible to staff and the public and that she has regular meetings with staff to discuss safety and other issues.
- Parks and Recreation has an emergency action plan that all staff are trained on and that provides guidance in how to respond to emergencies occurring in different parks and rec facilities.
- All staff receive a “Welcome to Parks and Recreation” manual when they are hired to introduce the new employees to the services the department offers.

Safety Concerns Specific to the Department

- Parks and Recreation staff are responsible for snow removal, which is a frequent cause of back strain and slip and fall injuries.
- There have been concerns about loose tiles in the pool and gym areas causing injury.
- Borough playgrounds have not recently been inspected to make sure they comply with current safety standards.

APEI Recommendations

- Develop a safety checklist for conducting safety walkthroughs throughout each facility. This should be specific to each facility (pool, playground, etc.) and would include looking for hazards such as fire and life safety, broken wall tiles, and other safety concerns throughout the department.
- Staff should be trained in the best technique to safely shovel snow.
- The department should develop a program for regular inspections of the playgrounds.

Police

Observations and strengths

- The Police Department has extensive Standard Operating Procedures that officers adhere to.

- The department has a very robust training program including the initial AST Academy and constant updated training on safety topics that pertain to police officers and staff.
- The department has high quality safety gear and other personal protective equipment for department staff.

Safety Concerns Specific to the Department

- Dealing with members of the public is where police officers face their greatest hazards.
- Bloodborne pathogens are another issue that staff face on the job.

APEI Recommendations

- APEI does not have specific expertise in police operations and has no specific recommendations for the Police Department. We encourage them to make changes to their training opportunities and documentation as detailed in the overall Borough recommendations above.

Public Works, Sanitation, and Motor Pool

Observations and strengths

- Public Works uses the APEI fire and safety checklist to inspect their buildings each year.
- The Motor Pool Department has a very robust program regarding inspections and maintenance for borough vehicles.
- Motor Pool mechanics have a preventative maintenance schedule with a written checklist in place to use during vehicle inspections.
- Sanitation has established a hearing conservation plan which includes Alaska Audiology providing an annual hearing exam.

Safety Concerns Specific to the Department

- The heavy equipment used in the department is hazardous in general.
- The staff at the sanitation department are exposed potential hazards in material that is dropped off by the public at the landfill.

APEI Recommendations

- The department is inconsistent about documenting their employees' training. They should ensure that training is documented in writing and sent to HR to be placed in the employee's personnel file.
- Ensure that all chemicals are properly labeled, and staff know where to find the safety data sheets for each chemical.

Water and Wastewater/Power and Light

Observations and strengths

- Due to the inherently hazardous nature of much of the work being done in this department, staff and department management are very aware of safety and the need to follow safe workplace practices.
- The Power and Light Department has weekly safety meetings to talk about current hazards and upcoming jobs.
- The Power and Light Department has an emergency action plan and goes over it with all new employees.
- Water and Wastewater employees are trained in confined space hazards and take them seriously.

Safety Concerns

The work done in these departments is inherently dangerous.

- The electrical workers deal with high voltage and many other electrical hazards.
- Water and Wastewater deals with confined space entry as well as hazardous chemicals.

APEI Recommendations

Develop a checklist for conducting safety walkthroughs throughout each facility. These checklists should be specific to the different types of facilities used by the department, and walkthroughs should be done at least quarterly.

Ways in which APEI can support the Borough

As a public entity pool, APEI offers a number of services to our members that may be of value to the Borough.

Employee Training

APEI offers several training opportunities to our members.

- We are able to visit members' sites and provide their staff with general training (as we did in February 2023 when we presented on-site training to Petersburg Borough staff on various Human Resources and management topics).
- Live training can be provided by APEI through videoconference.
- All APEI members have access to Lexipol, which offers on-demand web-based training in a number of topics relevant to city government operations, including Police, Fire, and EMS operations. This includes training in driver safety, management and communication skills, and OSHA related courses. Petersburg has taken advantage of the Lexipol training in the past and would benefit from it being more widely adopted.

As the Borough develops their new employee orientation and onboarding programs and identifies recommended training for more experienced employees, we recommend they look to Lexipol to help address these needs. Lexipol training courses are of high quality and can complement in-person or other training available to staff.

Human Resources Consultation

APEI provides consultation advice to our members on human resources issues, including issues related to the Americans with Disabilities Act (ADA), employee performance issues, and other subjects. In many cases, we can help the member determine the best course of action; in others we can help you narrow the scope of the question so it can be posed to an attorney.

Safety Support

APEI can provide support to members as they develop their risk management plan and safety practices. This includes:

- On-site Safety inspections of Borough buildings (as was most recently done by Cole Cummins in June of 2022);
- Assistance in the development of safety committees including suggesting topics for committee meetings and guidance through the first few meetings;
- Samples of safety programs and policies; and
- Fire and life safety checklists.

Loss Control Manual

APEI provides our members with a Loss Control Manual, updated annually, which provides detailed guidance on many of the items included in this report and the tools described here.

Legal Fee Reimbursement

Two situations faced by public entities – employee termination and reports of child sexual abuse – involve legal issues that may be more complex than are typically handled by a municipal attorney. To encourage members to reach out for specialized legal advice, APEI will reimburse the member for an hour of an attorney’s time in helping the member address these issues.

Crisis support

APEI now has access to organizations that can provide support to a member in the event of a serious incident that results in injuries or death to multiple people or was otherwise traumatic for a community. These organizations can help provide a community’s leadership with guidance in how to best support the affected individuals and respond to media attention after an incident occurs. Such support might have been helpful after the 2016 crash and would be available to Petersburg as an APEI member should they ever find themselves in another similar situation.

Additional Resources

Human resource management, employment law, policy samples:

Society for Human Resource Management (SHRM): <https://www.shrm.org/>

Public Sector HR Association (PSHRA): <https://pshra.org/>

Americans with Disabilities Act (ADA) and reasonable accommodation:

Job Accommodation Network (JAN): <https://askjan.org/>

Equal Employment Opportunity Commission (EEOC): <https://www.eeoc.gov/>

Workplace safety:

Alaska Occupational Safety and Health (AKOSH):
<https://labor.alaska.gov/lss/oshhome.htm>

Occupational Safety and Health Administration (OSHA): <https://www.osha.gov/>

National Institute for Occupational Safety and Health (NIOSH):
<https://www.cdc.gov/niosh/topics/default.html>