



# National Association of Letter Carriers

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## MEMORANDUM

From the Desk of Manuel L. Peralta Jr.  
Director of Safety & Health

May 15, 2018

To: All Regional Offices

Subject: USPS4330 / USPS Heat Safety Campaign for 2018

Attached you will find a copy of the 2018 USPS Heat Safety Program.

We presently are pending hearings before the Occupational Safety and Health Review Commission (OSHRC) on the contest of a number of OSHA Citations issued to the USPS for events occurring during the 2016 and 2017 heat seasons. During the end of 2017 through the beginning of 2018, the USPS and the NALC were tasked with developing a Heat Illness Prevention Program (HIPP). We reached a negotiating impasse over our differences, and those differences will be litigated before the OSHRC in the near future.

The attached Heat Illness Prevention Program (HIPP), include many suggestions submitted by the NALC during our bargaining efforts, but is missing some elements that caused us to reach impasse. Among the items that are not adequately covered involve compliance with OSHA's heat safety campaign requiring attention to Water - Rest - Shade, as well as Acclimatization. In spite of our differences we ask you to review the materials.

On your review of the attached we draw your attention to the following:

- 1) *"The HIPP is triggered when any employee in any facility is exposed, or reasonably anticipated to be exposed, to heat index temperatures exceeding 80 degrees Fahrenheit for extended periods of time, six hours or more, over the course of a work day or work shift."*

The NALC clearly disagrees with management's inference that you must be exposed to the heat for six hours or more before you are entitled to heat safety protection. If you are exposed to sufficient heat and are adversely affected, even if it is less than 6 hours of exposure, management is required to protect you from harm. For example, if you are working in a heat index (combination of temperature and relative humidity) of over 91°, you might suffer a heat injury long before 6 hours of exposure. The employer's responsibility begins long before their 6 hour reference as stated in their training material.

- 2) *"All local Postal Service owned or operated facilities will be responsible for the implementation of a HIPP for their employees provided the facility meets the heat exposure criteria outlined above."*

The local union should request copies of the local HIPP to make sure that one is in place and shared with all employees before we suffer injury or worse.

- 3) *“Each Area Vice President will designate an Area coordinator who will be responsible for ensuring the implementation and management of the HIPP in his or her area...”*

National Business Agents should request a comprehensive briefing from these coordinators at your next Area Safety Meeting and provide me with copies of any presentations other than those found in USPS4330.

- 4) *“The Postal Service will require annual completion of a Learning Management System (LMS) course on heat stress by all employees in every facility, regardless of exposure assessment findings: LMS Course Name: SAF:SS: Heat Stress Recognition and Prevention - Course Number: 10019802. This course will discuss the effects of heat on the body, outline the risk factors for heat-related illness, and describe the associated treatments for each. This training will also explain several control measure techniques and safe work practices that can be used to prevent heat-related illness, as outlined in this document.”*

Previously the USPS refused to require that every supervisor take the above referenced LMS course. On May 15, 2018, during a meeting of the National Joint Labor Management Safety Committee, the NALC was informed that 640,000 employees will be required to undergo LMS Course# 10019802 as referenced above. Management advised that each supervisor will be required to take the course by June 15, 2018. As union representatives you should be seeking confirmation that each and every supervisor has in fact taken the course and successfully passed.

In the future, all supervisors will be required to take the LMS course by April 1<sup>st</sup> of each year.

Management also emphasized that every single city letter carrier in our bargaining units will be required to undergo this training, which is expected to be conducted in group sessions. We have been informed that if requested, there are materials that can be printed and distributed to make sure the message is understood by all our employees.

- 5) *“As soon as possible, employees should report any signs or symptoms of heat-related illness to their supervisor, who should then call 911 immediately if it is determined that medical attention is necessary. However, if it is determined by the employee that medical attention may be necessary prior to calling the supervisor, the employee should call 911 first.” (emphasis added)*

In previous years we have struggled with unenlightened supervisors interfering with employees who were attempting to call 911 for emergencies. I addressed this issue in my August 2017 Postal record Column, which you should review if necessary. This year’s HIPP encourages the employee to call 911 before it is too late.

- 6) Figure #2 & #3 (page 3 & 4) were submitted by the NALC in our settlement efforts on the cases before the OSHRC since last Fall.
- 7) During our meeting of May 15, 2018, as referenced above, the NALC was informed that the item labeled "Heat Illness Prevention Program" with the "Safety Depends on Me!" logo is in fact a "Mandatory" safety talk which must be given between May 1, 2018 and May 25, 2018. I have attached a duplicate copy of that talk which I have Labeled "Mandatory Stand Up Talk" (accompanied by a screen shot taken during our meeting). The information indicates the following:

Type of Talk:	Mandatory
Assigned By:	National
Mandatory Talk Assignment ID:	2601
Bucket:	Weather
Safety Talk ID#:	2068
Safety Talk:	HIPP Quick Reference Employees
Delivery Timeframe:	05/01/2018 - 05/25/2018

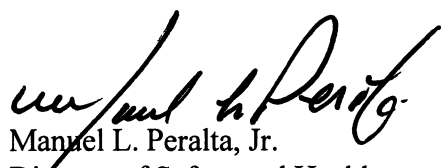
Please make sure that each work location provides the mandatory talk.

I have requested copies of any existing Stand Up Talks (SUT) from the USPS Safety Tool Kit. I will forward those to you on receipt.

Please review and distribute this information to the branches in your region.

A hard copy will be sent in a future mailing.

Thank you for your attention on this matter,



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