CPCU SOCIETY
INSURING YOUR SUCCESS
1944-2004
Celebrating the Past, Shaping the Future

Loss Control Quarterly LCQ

Volume 15 Number 3 September 2004

Cell Phones, the Questionable Advantages of Hands Free

by Charles H. Morgan, J.D., CPCU, CLU, CSP, ARM

Charles H. Morgan, J.D., CPCU, CLU, CSP, ARM, is vice president, risk management for Fleet Insurance Services, a firm that has implemented a new program offering risk management services to clients and prospects. Morgan has worked as a loss control and risk management executive for major insurance carriers during his 20-plus-year career, and supports the view that meaningful risk management requires a holistic analysis of the full range of a firm's exposures, whether or not historically insurable.

Morgan earned a B.A. and M.A. at Lehigh University, and a J.D. at Dickinson School of Law. He is admitted to the Bar in Maine and Pennsylvania; serves on the Editorial Advisory Council of *Risk Management* magazine; and is currently engaged in the revision of the Insurance Institute of America's Associate in Risk Management curriculum . . . and, of course, he is the editor of your *LCQ!*

A recent article in *The Wall Street Journal* (July 19, 2004) provided an additional measure of doubt regarding the rationale behind the recent legislation in New Jersey and Washington, DC, mandating the use of hands-free cell phones while operating a motor vehicle. That is, on July 1 of this year those jurisdictions joined the State of New York in outlawing the use of hand-held devices while driving. According to the *Journal* piece, however, such legislation may not reflect the safest course of action, but rather may result in large part from marketing efforts by the hands-free equipment suppliers such as Verizon and the various auto manufacturers who also support such legislation.

Actually, these statutes do not require truly "hands-free" devices, as most phones still require the use of the caller's hand while dialing. What they do restrict, however, is the use of the driver's hands while talking on the phone. As has been demonstrated in study after study, though, this requirement not only does not create a safer operating environment, but in fact may be more hazardous than the use of a hand-held cell phone.

The article is written from the perspective of the National Highway Traffic Safety Administration (NHTSA) and its administrator, Dr. Jeffrey Runge. In light of recent research conducted by the agency, the NHTSA drafted a letter last year that it intended to distribute to all 50 U.S. governors. The letter pointed out that requiring headsets "will not address the problem" of talking on the phone while driving, and "may erroneously imply that hands-free phones are safe to use while driving." The letter was never actually sent pending the release of the final results of the NHTSA's research, which in retrospect Runge believes may have been a mistake.

The leading study on this issue to date was published in *The New England Journal of Medicine* in February 1997. This landmark study found that using a cell phone while driving leads to a risk of a motor vehicle collision that is four times higher than normal, or roughly the increased risk comparable to being legally drunk. The study went on to make the following observation:

> We observed no safety advantage to hands-free as compared with hand-held telephones.

The *Journal* piece cited a few other recent studies supporting this proposition. A 2001 study in Norway, for example, found that drivers tended to make more calls than otherwise when they had hands-free phones. Similarly, a recent study in Sweden found that drivers with hands-free phones tended to drive faster than those with hand-held phones. Also

Continued on page 2

What's in this Issue?

Cell Phones, the Questionable Advantages of Hands Free

Continued from page 1

braking time was reduced by as much as 45 percent "with no improvement for those wearing headsets."

What accounts for a legislative trend that seems to defy the science underlying the issue? *The Journal* concludes that much of impetus for these laws results from lobbying efforts by the manufacturers of the headsets themselves, as well as their allies in the auto industry. For example, Verizon Wireless's "backing was key to the passage of a 2001 law in New York State." The firm's chief executive, Denny Strigi, is quoted as follows:

> Isn't it obvious that it's safer to have a headset on? Two hands on the wheel, how can that be less safe than driving with the phone at your ear?

It appears that Mr. Strigi has not bothered to reference any of the studies cited above.

These sentiments appear to be shared by various auto manufacturers such as Chrysler and Ford, which are proceeding to install wireless connections in future model rearview mirrors and sun visors so that a driver's verbal communications can be relayed to the cell phone in the vehicle. GM's On-Star already provides hands-free phone service at the push of a button. John Stratton, chief marketing officer of Verizon Wireless, makes the following observation concerning the OnStar program:

> With the advent of hands-free legislation in many states, the value of this proposition becomes even greater.

The NHTSA's Runge is justifiably concerned that this push for hands-free technology clearly flies in the face of the science underlying the subject matter. He feels that it is more than ironic that allowable blood levels with respect to drunk driving are constantly getting tighter while safety standards in cell phone use appear to be moving in the opposite direction. His agency has recently funded two major studies in Iowa and Ohio that he hopes will reverse this trend when the final results are ultimately published. Given the marketing might of the informal alliance between the telecommunications industry and the auto makers, however, this hope would appear to be wildly optimistic at best. ■

Highway Safety Agencies Remind Drivers:
ALL Distractions Potentially Dangerous

With recently approved hand-held cell phone bans that took effect in New Jersey and the District of Columbia on July 1, the Governors Highway Safety Association (GHSA), the organization that represents state highway safety agencies, is reminding drivers that cell phones are not the only distractions they need to safely manage while driving.

GHSA is also urging other states to refrain from passing hand-held cell phone legislation because the association believes these laws are not likely to have a significant safety benefit. Hands-free devices, while perhaps offering some added convenience to the driver, do not mitigate the intellectual distraction—the conversation. Drivers are similarly distracted when using either a hand-held or hands-free phone. In fact, hand-held cell phone bans send the wrong message to drivers and give them a false sense of safety as it encourages them to drive while carrying on a conversation, albeit on a headset.

Last summer, GHSA joined AAA and its Foundation for Traffic Safety in announcing research from the University of North Carolina showing that reading and writing, eating, adjusting the radio, interacting with others in the car, grooming, as well as cell phone use, were major distractions. Employing in-car video cameras to observe how drivers behave, the study concluded that all drivers in the study had been distracted to some degree, 90 percent by something outside the car and 100 percent by something inside the car.

Kathryn Swanson, chair of GHSA, says, "The AAA research reaffirms that cell phones are the distraction that drivers love to hate, but in fact they are just one of many that drivers encounter on a daily basis. Anything that takes a driver's attention away from the task at hand can be potentially fatal, especially distractions that require a cognitive element." Swanson continues, "Driving is a complex task and full attention to the matter at hand is needed to reduce the chance of error. The best advice is for drivers to limit these distractions as much as possible: pull over to a safe location to eat, set your radio station/CD player before you start driving and do not use a cell phone, either hand-held or hands-free, while driving."

GHSA discourages drivers from using cell phones while driving and advocates educating drivers about how to manage distractions in the vehicle. Swanson says, "Good highway safety policy must be based on sound research and clear evidence of the extent of problem. While the AAA study is an important step in the right direction, we do not know how serious the distracted driver problem is, particularly as it relates to cell phones."

One of the main reasons GHSA does not support the banning of hand-held cell phone use by motorists is a lack of relevant crash data. To address this need, GHSA and the Department of Transportation have jointly developed model data elements that include cell phone use and other distractions for police officers to use while investigating a crash.

Currently, only 14 states list distractions on their crash forms, but GHSA is hopeful that number will increase as states revise these forms.

"States typically update their crash forms about every five years, so I think we'll start to see more of them include places for distraction information. We realize that distractions will be underreported since drivers are not likely to offer that they were engaging in behavior such as cell phone use, but we do think it will give us at least a better picture as to the extent of the problem than we have now," Swanson said.

GHSA is urging the federal government to fund additional research on the issue and to evaluate the hand-held cell phone ban in New York State. New York banned hand-held use while driving in 2001 and a state study on the law's impact is due by December 2005. ■

The Governors Highway Safety Association (GHSA) is the nonprofit association representing the highway safety offices of states, territories, the District of Columbia, Puerto Rico, and the Indian Nation. Its members are appointed by their governors to administer federal and state highway safety funds and implement state highway safety plans. For more information, contact GHSA at (202) 789-0942 or visit www.ghsa.org. Reprinted with permission.

When Accidents Happen, Take Action

by Mark Gaskamp, CPCU, ARM, CRM, ALCM, CSP

■ **Mark Gaskamp, CPCU, ARM, CRM, ALCM, CSP,** is a senior account executive for St. Paul Travelers, responsible for marketing and commercial underwriting. He is a national faculty member of the National Alliance for Insurance Education & Research for the Certified Risk Managers (CRM) program.

He can be reached at riskconsulting@yahoo.com

Editor's note: This article is being reprinted with permission from the May 2004 issue of *Rough Notes.*

Whether one is walking across the floor of a manufacturing plant or driving home from work, accidents happen. Many organizations have learned that in order to save valuable resources and maintain a successful risk management program, they must learn from these experiences and avoid recurrence. This may sound like a simple concept, but when employers are dealing with on-the-job injury, they get caught up in the minutiae of insurance forms, OSHA recording, and finding a replacement worker. Consequently, they devote limited time and effort to determining the cause and preventing the same type of incident from occurring again. Developing a comprehensive accident investigation program is one of the key elements of a sound risk management program.

Successful accident investigation programs are developed for one primary purpose: to prevent recurrence. A successful program includes five key areas: (1) developing a sound accident investigation form, (2) instilling supervisory involvement in each phase of the process, (3) performing a timely investigation, (4) conducting data analysis, and (5) maintaining accountability. Organizations that are developing a new program or looking to audit their existing process should evaluate the effectiveness of each of these areas as the foundation for a sound accident investigation program.

The Accident Investigation Form

No matter how large or small the organization, there must be a process in place to respond to an accident. Many organizations fall short in this area because they use one standard form for all accidents, or they use a form not specific to their own organization. There should be a distinct process specific to the organization for worker injuries, property incidents, auto accidents, and liability incidents, as each requires a different response.

The form should include all of the pertinent information specific to the organization's operation. Shifts, locations, or departments vary from organization to organization and are vital in the analysis of data to help determine trends. An organization that has not taken the time to develop its own process and forms will inherently lack the necessary information to complete a sound investigation.

The ingredients of the document should address not only statutory and insurance matters, but also fact-finding and prevention measures. A complete form containing the necessary information provides a road map for the investigative process and contains the data elements used for analysis. For organizations just beginning a safety program or starting a safety committee, developing an accident investigation form is an excellent place to start.

Supervisor Involvement

Safety and risk management staff can serve as a great resource during the investigation process, but because no one knows the job better than the supervisors, they should take the lead. This is particularly important regarding worker injuries involving time away from work. Injured workers can become confused by the workers compensation system due to the number of individuals they must deal with during the process. Many employers have found out the hard way that alienated workers turn to the legal system for solutions, if not by obtaining legal council, by developing a defensive attitude regarding the entire process. The supervisor can be the link in this process to maintain a positive relationship between injured worker and employer.

The supervisor also should conduct investigation interviews of the individual involved in the accident, co-workers, and any other persons in the area, and the supervisor should be the one to complete the accident investigation form. Supervisors are best suited for this task

Continued on page 4

When Accidents Happen, Take Action

Continued from page 3

because they have established relationships with the individuals involved, and if they carry out their task properly, they can typically obtain insightful information not available to an "outsider."

Lastly, the supervisor should evaluate the cause and determine the appropriate actions to prevent recurrence. No other individual is more familiar with the job or has the authority to recommend changes.

Organizations hold supervisors accountable for production results, quality and, in many cases, accidents. In order to develop and maintain a quality accident investigation process, organizations must also hold supervisors accountable for the process itself. This should include accurate, complete information and a logical remedy to prevent recurrence.

Timely Reporting

Not only should supervisors be held accountable for the information in the report, they must also get the report in on time. Almost every study carried out by an organization involved with claims or claims management reveals that the longer the time between the accident and when it is reported, the higher the cost will be. Accident costs can increase 5 percent each day the claim goes unreported. The biggest jumps in claim costs are those that are reported more than 48 hours after the accident occurred. Average claim costs increase 20 to 35 percent versus those reported in the first 48 hours.

The claim needs to be aggressively handled by an individual experienced in handling claims in a timely manner. Delayed interviews create the potential for inaccurate or incomplete details surrounding the accident because individuals cannot recall all of the specifics, or they may create "stories" in order to protect the perpetrator. A good rule of thumb is that a supervisor should not leave the scene of the accident or leave the workplace for the day without completing at least the initial interviews and survey of the accident scene. Obviously, if there is a serious injury involving emergency treatment, the worker interview will have to wait, but other interviews and a review of the accident scene need to be carried out that day. Every day the report waits, the more it costs.

Data Analysis

There are two ways to analyze an accident. The first is by evaluating the specific details associated with the accident itself. A sound accident investigation process with the components outlined above will address this means of analysis.

> ***A good question to ask is, "If a problem is identified by analyzing this data, how can we prevent this from happening?"***

The second is to evaluate the cumulative events and look for trends. For organizations with the misfortune of having many accidents, systems should be in place to analyze the data compiled from the accident investigation forms. For smaller or more fortunate organizations with only a few claims to analyze, looking at all the claims on an annual basis can identify common links that show a trend and help target specific problem areas. The annual insurance renewal can be an excellent time to look at what is driving the premiums instead of just the insurance bill itself. Proactive agencies, consultants, and risk managers are turning claim reviews into meaningful discussions about trends and prevention.

For larger organizations with many accidents, the analysis can include sophisticated risk management information systems, trending via regression analysis, and elaborate arrays of data elements. With all of this sophistication, the concept of looking for trends and commonalities so that resources can be best allocated will remain the same.

When beginning the analysis process, it is important to know what the results should prove or show. Focusing on meaningful information that can be actionable is critical. For example, many claim reports include the number of claims by the day of the week. If the operations are the same every day, the day of the occurrence is almost irrelevant. A good question to ask is, "If a problem is identified by analyzing this data, how can we prevent this from happening?" Not working on Tuesday is probably not a viable answer. Along these same lines, analysis by "body part" provides less value than evaluating the "cause" of the accident because it aligns much closer to prevention. In other words, we can prevent strains or falls; we cannot prevent "backs." Again, knowing what you want to evaluate before you start can avoid useless number crunching.

The most important concept in data analysis is data integrity; without accurate and complete data, efforts will be wasted. When there are problems with data integrity, just as in the accident investigation process, one should look for the root cause of the errors. Unfortunately, many organizations, even those with many claims, spend more time recording and correcting information than analyzing it. Proactive organizations have taken action to modify claim systems and processes to improve data integrity.

The evaluation of data can be achieved either by looking at the accident itself or by analyzing accidents over time. The value of the accident investigation process is to learn from our mistakes and take action to avoid the same pitfalls down the road.

Accountability

Successful organizations put accountability systems into place for

production results, quality, and accidents. In order to develop and maintain a quality accident investigation process, it is imperative that employees, supervisors, and management staff are held accountable for the process itself. This should include accurate, complete information and a logical remedy to prevent reoccurrence.

There should also be measures for accident-reporting "lag time." Individuals with consistent late reporting will inherently have increased accident costs and thus should be held accountable for this financial burden on the organization. Many organizations measure performance in this area via a simple objective measure, for example, maintaining that 90 percent of all accidents are reported within 48 hours. This allows for minor flexibility in getting the report to the appropriate persons and the occasional late report outside the control of the staff.

Accidents happen, but they do not have to happen a second time. Organizations that have taken the time to develop a comprehensive accident investigation program that evaluates accidents and ensures action to prevent recurrence can save time and money and, what is most important, can prevent other individuals from getting hurt. ■

Reach for the Stars!

The Loss Control Section Is Proud to Announce that It Will Sponsor an Informative Seminar at the 2004 Annual Meeting and Seminars in Los Angeles!

Crisis . . . What Crisis?

Monday, October 25, 10 a.m. - Noon

What You Will Learn

Ignoring or misunderstanding a crisis can cause significant damage to both your company's reputation and productivity. And it is estimated that large companies will face a crisis every four to five years. Learn what to do the next time a crisis hits and how to manage the crisis so that your organization and clients maintain financial results, brand, reputation, and relationships with employees, customers, and suppliers. All insurance professionals who want to increase their awareness of crisis management, emergency response planning, and business continuity planning, as well as advising client organizations to build these plans, will benefit from this session.

Presenters

Tony Adame, CBCP
Marsh Risk Consulting

Gus G. Anagnos
Marsh, Inc.

Mitchell C. Motu, CPCU, CBCP, CSP
Marsh Risk Consulting

Register today at www.cpcusociety.org!

The Merits of Safety Incentive Programs

Are You Still Paying Huge Bills for Injuries You Should Be Preventing? Incentive Programs Are Part of the Overall Safety Equation

by Jim Barr

■ **Jim Barr** is vice president of sales for C.A. Short Company in Shelby, North Carolina. Founded in 1937, it is a leading provider of safety incentive programs.

Editor's Note: C.A. Short's corporate account manager, **Lisa Loew,** can be reached at (516) 791-0500. Her e-mail is lloew@cashort.com.

There are many questions regarding the merits of safety award programs. Are they effective? Do they produce the desired results? Could they be cost justified? These are very complex questions with no simple answers, because there are many ingredients that comprise successful programs. Even before attempting to answer these questions, it is important to distinguish between an incentive and a recognition program.

Incentive programs require a mental activity or exercise that stimulates effort or action. They are proactive, before and during accomplishment. They should be designed to modify normal behavior by raising and more importantly, maintaining the highest level of safety awareness possible.

Recognition programs recognize an accomplishment that is already known or experienced. They are reactive, showing appreciation after the accomplishment.

Both incentive and recognition programs have their place in a well-rounded safety program. No one should ever think that a stand-alone incentive or recognition awards program is all they ever need to solve their safety problems or address safety issues. An incentive program is just a piece of the safety pie. It is most often the missing piece, the piece that brings in the human element, the motivation, the encouragement, the reminder that safety is important. It should enhance and bring attention to the other pieces of the safety pie, such as safety training, safety equipment and the proper use of it, safety meetings, a clean and safe working environment, and safety awareness.

Safety incentive programs are most effective when certain ingredients are present. Improperly designed and implemented programs will many times be just another cost to a company when they should be an investment with a return that directly affects the bottom line.

There are many types of programs in the marketplace. Some are more effective than others. Some may be called incentive programs but lack the ingredients of a true incentive as defined above.

A few common elements found in the most successful safety incentive programs are:

- **Management and union support.** This support must be visible, active, and continuous, from the highest executive level to the supervisor on the floor. If those in authoritative positions do not endorse and drive the program, it has little chance of success. Workers respond and are motivated by the enthusiasm exhibited by those in positions of authority. Many companies do this by printing a letter of endorsement in their awards catalog, safety notes in payroll stuffers, safety newsletters, addressing workers at safety meetings, award functions, and much more.

- **Well-defined goals and simple rules.** If workers are going to be asked to help reach corporate goals and objectives, it is important that they know what those goals and objectives are. Goals should always be challenging, require effort and improvement, but they must be realistic and attainable. The program rules should be simple and easy for everyone to understand. Rules that are complicated will frustrate workers and render the program ineffective.

- **Positive and continuous communications.** Corporate goals and program rules should be communicated in such a way that they will be a visual and constant reminder to workers of the company's commitment to safety in the workplace. This can be accomplished by printing them on program materials, explaining them at safety meetings, and at the program kickoff and displaying them in easily

accessible public places such as at time clocks, on bulletin boards, and in lunch rooms.

Positive reinforcement communicated on an ongoing basis by supervisors and upper management is a vital element in the behavior modification process. Safety awareness will become part of workers' everyday thinking and that is the key to a successful safety incentive program.

- **Accrual programs** The most effective program types in industry today are those that allow participants to earn and accumulate safety stamps, points, coupons, or other type of credits that can be redeemed at any time or saved up for awards of higher value. This encourages workers to set goals as they choose an award they want to work toward earning. Safety awareness is maintained at the highest level as workers go through the exercise each month of earning, accumulating, and counting their credits to measure how close they are to redeeming them for the award of their choice. Family involvement adds to the enthusiasm of the program as family members get involved in the award selection process. Again, it is important to remember that this process should be designed to reinforce and enhance the safety training, use of safety equipment, and safety rules already in place.
- **Short recognition periods.** It is a known fact that the extent of most people's ability to concentrate on a goal effectively is about 30 days. One of the major elements that distinguishes an incentive program from a recognition program is the interval in which a worker is recognized and awarded for safety achievement. Many times, annual goals are forgotten until the award is given, which does little for safety awareness along the way.

By simply breaking down the annual goal into monthly or even quarterly segments, safety awareness is greatly enhanced because the recognition period is shorter and is perceived as being much more attainable. Additionally, the interval between the time the goal is attained and the award is received should be minimal. Immediate positive reinforcement will greatly enhance the achievement, which continues to maintain and raise the level of safety awareness.

- **Individual recognition.** Built into our human nature is the need to be recognized. When workers are asked what are the most important issues pertaining to their jobs, recognition is generally among the top three. In many surveys, recognition ranks above compensation.

If companies expect to attain certain safety objectives, they will be accomplished one worker at a time. Individual achievement is something everyone can grasp and identify with. Lottery and drawing-type programs allow workers who qualify according to the rules of the program to participate for a "chance" to win the award. Although these programs do generate initial interest and enthusiasm, they tend to demotivate workers quickly because there typically are more losers than winners.

Safety lotteries and drawings can be effective if used in conjunction with an existing incentive program to boost awareness and keep the program fresh and exciting. It is important to the success of the program that all participants who achieve the company's safety goals and objectives be recognized individually. Team, department, plant-wide, and other types of peer-motivated goals are effective aspects of comprehensive incentive programs. However, if the program is weighted too heavily by peer pressure, it could be regarded as encouraging non-reporting of accidents and injuries or creating the "walking wounded" scenario. The emphasis of the program should always be toward the individual achievement.

- **Desirable awards.** If the goal of the incentive program is to produce results by modifying normal behavior and creating safety awareness, the awards need to be enticing and desirable. Although the more traditional safety prizes such as T-shirts, ball caps, and pizza lunches are necessary as awareness boosters, they typically do not motivate employees to work safely.

Awards are more desirable when they have a high perceived value and when the workers are given the opportunity to choose their own awards from a wide variety of award items. Whatever the award may be, if the worker goes through the exercise of choosing it, it will remain in and around the home and will be a constant reminder of where it came from and what was accomplished to earn it.

It is a fact that most on-the-job accidents and injuries are the direct result of carelessness and distraction. Knowing this fact, it is also true that most of them are preventable. Many companies continue to fatalistically pay the bills for injuries when they are a controllable expense.

Even with comprehensive safety programs including the very best engineered controls, personal protective equipment, technical safety training, and government interventions, millions of American workers are injured on the job every year and companies spend billions of dollars reacting to this. Realistically, there is no single element of a safety program that is going to solve all safety problems in any workplace. Proactive safety incentive programs, custom designed to address specific safety goals, play a vital part in raising and maintaining the highest level of safety awareness possible in all the other aspects of an overall, comprehensive safety program. ■

Join other CPCUs, new designees, and industry VIPs in Los Angeles for the best in education, networking, and leadership the property and casualty insurance industry has to offer—and to "Reach for the Stars!"

- Focus your continuing education on the skills—and CE credits—you need to succeed, with **more than 20 Property and Casualty Insurance Track seminars** to choose from.
- Learn the communication, management, planning, and organizational skills needed to advance your career through **more than 20 Leadership and Career Development Track seminars.**
- Meet CPCU Society members, colleagues, and industry leaders who can influence your success at **an exciting variety of Special Events.**
- Open your eyes, your heart, and your mind to a radical redefinition of the leadership skills you and your organization need with **2004 Keynote Speaker Tom Peters,** renowned business thinker, speaker, and best-selling author.
- Celebrate 60 years of CPCU Society success at special **60th anniversary celebratory and recognition events** throughout the Annual Meeting.

Register Today!

It's the professional development event of the year. For the latest information about this year's meeting, to register online, or to download the registration form, visit the CPCU Society web site, **www.cpcusociety.org**. If you have any questions or if you'd like to request a registration form, contact the Member Resource Center at (800) 932-CPCU, option 5, or e-mail us at **membercenter@cpcusociety.org**.

Loss Control Quarterly
is published by and for the members of the Loss Control Section of the CPCU Society.

***Loss Control Quarterly* Editor**
Charles H. Morgan, J.D., CPCU, CLU, CSP, ARM
Fleet Insurance Services
Phone: (908) 653-3177
e-Mail: charles_morgan@fleet.com

***Loss Control Quarterly* Assistant Editor**
Donald J. Jackson, CPCU
Zurich North America
Phone: (516) 997-8859
e-Mail: don.jackson@zurichna.com

Loss Control Section Chairman
Eli E. Shupe Jr., CPCU
Cincinnati Insurance Company
Phone: (513) 870-2447
e-Mail: eli_shupe@cinfin.com

Sections Manager
John Kelly, CPCU
CPCU Society

Managing Editor
Michele A. Ianetti, AIT
CPCU Society

Production Editor/Design
Joan Satchell
CPCU Society

CPCU Society
720 Providence Road
Malvern, PA 19355-0709
(800) 932-2728
www.cpcusociety.org

Statements of fact and opinion are the responsibility of the authors alone and do not imply an opinion on the part of officers, individual members, or staff of the CPCU Society.

© 2004 CPCU Society

Printed on Recycled Paper

Loss Control Quarterly LCQ

Volume 15 Number 3 September 2004

PRSRT STD
U.S. POSTAGE
PAID
BARTON & COONEY

CPCU Society
720 Providence Road
Malvern, PA 19355-0709
www.cpcusociety.org