



# Risk Control Incentive Program

Prepared by  
CCAP Risk Control Services

Revised October 2018



# PCoRP Risk Control Incentive Program Renewal Report Form

## Credit Applied To 2019 - 2020 Policy Year

(Completed Renewal Report Form to be submitted with the PCoRP renewal documents.)

<i>(Please Print)</i>	
<i>PCoRP Member (County or County Related Entity)</i>	
<i>Form Completed By</i>	<i>Title</i>
<i>Email Address</i>	<i>Telephone Number</i>

The PCoRP Risk Control Incentive Program provides a maximum of 4% credit applied to the loss fund premium. Full description of each item is provided in the text of the PCoRP Risk Control Incentive Program.

**Credit Available for Each Section** - Description of credit categories may be found on the pages indicated.

- (1) 0.5% Credit – Safety committee (RCIP page 2)
- (2) 0.5% Credit – IT Disaster Recovery Program (RCIP page 3)
- (3) 0.5% Credit – Education and training (RCIP page 5)
- (4) 0.5% Credit – Sexual harassment policy and annual training (RCIP page 6)
- (5) 0.5% Credit – Prison policy review (RCIP page 6)
- (5A) 0.5% Credit - Alternative for PCoRP Members with no jail/prison facility who develop a Special Risk Management or Risk Control Program (RCIP page 6)
- (6) 0.5% Credit – Prompt claims reporting (RCIP page 6)
- (7) 0.5% Credit – Vehicle safety program (RCIP page 7)
- (8) 0.5% Credit – Internal financial controls (RCIP page 8)
- Number of items checked (maximum 8) for **CREDIT**.
- Number multiplied by .5% (equals credit applied to 2018 - 2019 PCoRP loss fund premium. 4% maximum)

### Risk Manager Credit

- 5% Credit for full time risk manager on staff. (Job description required. RCIP pg. 8)
- 2.5% Credit for half time risk manager on staff. (Job description required. RCIP pg. 8)

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\_\_\_\_\_  
*Signature of Commissioner or authorized person (name & title)*

\_\_\_\_\_  
*Date*

## Risk Control Incentive Program

PCoRP has provided this program to provide recognition and financial credit for risk control activity. A loss fund premium discount is available for satisfactorily completed or implemented items.

To encourage risk control activity, the PCoRP Board of Directors has over the years provided the means to reduce member contribution based on risk control activity. PCoRP Members may earn a discount from the loss fund contribution based on satisfactory completion of the Risk Control Credit items. (eight possible items for credit of 0.5% each.) This document consolidates all the risk control credit criteria in order that PCoRP Members may be more aware of the requirements of the program.

The PCoRP RCIP renewal report shall be submitted to PCoRP with the renewal application for the next year. The renewal application is submitted in December prior to the renewal at June 1. (The coverage year is June 1 through May 31.) The next report will reflect the activity accomplished for the 12 months prior to submitting the renewal application. The report may be subject to audit and verification of documentation.

The maximum incentive credit of 4% of the loss fund contribution is divided into eight equal parts or 0.5% each. The alternate #4A is provided if the PCoRP member has no jail/prison facility.

**NOTE: PCoRP staff will have the final decision to determine if one or more of the seven items shall receive credit.**

If you have questions about the Risk Control Incentive Program, please contact your CCAP Risk Control Specialist or Keith Wentz, Risk Management and Underwriting Manager at (800) 895-9039 or [kwentz@pacounties.org](mailto:kwentz@pacounties.org).

### **CLAIMS & RISK CONTROL COORDINATOR**

The PCoRP Member shall designate specific employees for both the Claims Coordinator, and Risk Control Coordinator positions. The responsibilities of these positions are indicated below. If the PCoRP Member county or county related entity is also a member of PCoRP, the coordinators may be the same individual for both programs, if desired. The individual should not be selected solely because they work with county property, maintenance or personnel issues.

#### **Claims Coordinator**

The Claims Coordinator acts as the liaison between the member county or entity and the PCoRP claims representative. This individual reports all claims to PCoRP in addition to notifying PCoRP of suits or other legal action filed against the member county or entity. The Claims Coordinator is responsible for providing or coordinating the supply of all information requested by the PCoRP claims representative. This individual may also be responsible for providing loss runs and loss analysis to the commissioners or administration. The PCoRP member shall report claims, on line, electronically. For information regarding the reporting of claims, please contact Cassie Troup, Claims Manager at 1-800-895-9039, **ext. or** email [ctroup@pacounties.org](mailto:ctroup@pacounties.org).

#### **Risk Control Coordinator**

The Risk Control (RC) Coordinator should be appointed by the commissioners (council members, county executive, or agency director) and should report directly to this level of administration. The RC Coordinator should be a management level staff member who has an interest in, or knowledge of

insurance or risk control, in addition to having the respect and cooperation of all supervisory staff within the organization.

Each PCoRP member shall designate a RC Coordinator. The RC Coordinator should be involved with the safety committee, the investigation and reporting of incidents, hazard identification, training, etc. The RC Coordinator should have direct access to senior administration of the county or county related entity.

PCoRP members may receive a periodic printout of their claims activity and this report should be reviewed regularly

### **RISK CONTROL INCENTIVE CREDIT**

Claims and risk control coordinators shall be designated to facilitate communication with PCoRP in addition to the responsibilities indicated above. Prompt follow-up on recommendations provided by PCoRP is expected. No incentive credit will be available if claims and risk control coordinators have not been designated and/or recommendations have not received attention.

If the PCoRP Member desires assistance in the development of these programs or procedures, the CCAP Insurance Programs Risk Control Department is available for consultations, guidance and assistance.

### **CREDITS**

#### **(1) 0.5% Credit – Safety Committee**

The PCoRP Member should have an active, fully functioning, safety committee (also known as risk control committee). The RC Coordinator should be a member of this committee, but does not need to chair the committee. Minutes shall be maintained for all safety committee meetings, and a copy shall be sent to your CCAP risk control specialist. If the PCoRP Member is also a member of PCoRP, the member is encouraged to have one safety committee organization to cover all safety related activity of both programs. Other risk control, security or safety committees of the county or entity may be combined with this committee to minimize duplication. In order to minimize duplication and utilize time efficiently it is suggested that all safety related committees may be combined including the PCoRP safety committee, vehicle safety committee, facility security, and employee safety (workers' compensation) committee.

A safety committee with a minimum of five staff members should be appointed by the commissioners or director of the county related entity. All major departments within the organization should have representation on the committee. The chairperson may be designated by the commissioners, or may be elected from within the committee. The chairperson of the committee may be the designated risk control or claims coordinator, however this is not necessary.

The ultimate responsibility for safety in any organization starts at the top. A safety policy statement for the county or county related entity should be developed and signed by the commissioners or executive director. The formal written safety policy statement demonstrates to all staff the support and commitment of the commissioners or executives of the organization. The safety policy statement should be publicized in order that all county or entity personnel are aware of the policy. The policy should be posted and a copy provided to all staff. The PCoRP program, vehicle safety program and the workers' compensation program may adopt the same safety policy statement. The policy statement should be revised as needed or readopted when there is a change of commissioners, county executive, or executive director.

The safety committee should meet at least six times per year. (The PCoRP Safety Committee meets at least six times per year to qualify for credit). Formal minutes of the committee meetings should be maintained with copies sent to the commissioner's office, to PCoRP Risk Control Department and other offices as may be desired.

Self inspection (hazard identification) reports of PCoRP member facilities should be completed at least quarterly. The reports should then be reviewed by the safety committee. The inspection reports may be summarized in the minutes of the safety committee meeting or may become an attachment or addendum to the safety committee reports. The inspection reports should be retained by the county or entity and should NOT be sent to PCoRP. **The minutes of the safety committee should be submitted to the PCoRP Risk Control Services, preferably by email.** *Note: The minutes may serve as documentation to enable CCAP Insurance Programs staff to evaluate the incentive credit to be applied as a discount to the loss fund of the following year.*

Each member of the Safety Committee shall receive annual training regarding the Committee's function and purpose, accident investigations, and self inspections. These trainings may be conducted on-line, or by a qualified person, including CCAP staff. Attendance at the **CCAP Safety Committee Workshop is encouraged.**

In order to qualify for this credit, a copy of the safety policy statement may be requested in addition to a copy of all safety committee minutes for the year. These documents may be reviewed by the CCAP risk control and underwriting staff to determine eligibility for this credit. Minutes of the safety committee meetings should be emailed to the CCAP risk control specialist or the Risk Management and Underwriting Manager.

Please see the safety committee section above for guidelines and description of safety committee.

If the PCoRP Member desires assistance in the development of these programs or procedures, the CCAP Insurance Programs Risk Control Department is available for consultations, guidance and assistance.

## **(2) 0.5% Credit – IT Disaster Recovery and Security Incident Plans**

### **IT Disaster Recovery and Security Incident Plans**

Counties generate and acquire large amounts of data and are responsible to ensure that this ever-changing data is protected. At any time, data could be lost, corrupted, compromised or stolen. This could be through hardware failure, human error, hacking and malware, among other things. Such loss or corruption of data could result in significant business disruption.

At the same time, County vulnerabilities are increasing as more and more business is conducted online. To mitigate the vulnerabilities and lower risk, every organization is compelled to make appropriate incident response and disaster recovery plans and use advanced technology to keep its network secure and stable. In this day and age of cybercrime, policies and procedures are essential tools for County IT departments to prepare for the unexpected.

**In any organization that prepares itself for Cyber Events or Disaster Recovery, the three main points to consider are Prevention, Anticipation, and Mitigation.**

- Prevention is the act of avoiding those disasters in the first place

- Anticipation is to plan and develop adequate measures to counter those disasters which cannot be avoided
- Mitigation is to effectively manage disasters, and thereby minimize the negative impact

### Disaster Recovery Plan

An IT Disaster Recovery Plan (DRP) is a comprehensive documentation of well-planned actions that are to be adopted before, during, and after a catastrophic event. In order to ensure business continuity and availability of critical resources during disasters, the disaster response should be documented and also tested in advance.

Ideally the DRP is part of a county's Continuity of Operations Plan (COOP). This will ensure that computer systems are available to help expedite the process when the actual disaster or emergency strikes. The key to IT or network disaster recovery is preparedness. The DRP is the foundation of COOP and include the following primary objectives:

- Ensuring the highest level of security possible
- Plan for continuity of the data center and related equipment
- Establish procedures for ensuring connectivity to service providers (fiber, cable, wireless, etc.)
- Support the priorities for recovery of business functions and related software applications
- Minimizing disruption of county operations
- Minimizing delays in meeting resident's needs
- Securing confidential information
- Assuring reliable backup systems

Data backup and recovery should be an integral part of both the COOP and the IT DRP. Developing a data backup strategy begins with identifying what data to backup, selecting and implementing hardware and software backup procedures, scheduling and conducting backups and periodically validating that data has been accurately backed up.

The industry standard approach should be utilized for data backups. Whether it is the "3-2-1", or the "GFS" (Grandfather, Father, Son) approach, full and incremental backups are essential. IT Departments should create 3 backups on 2 different mediums, including 1 offsite date storage solution that include monthly, weekly and daily backup procedures.

### Incident Response Plan

In terms of Cyber incidents, counties should create and Incident Response Plan. According to the SANS Institute<sup>1</sup>, there are six key phases of an incident response plan:

1. Preparation: Preparing users and IT staff to handle potential incidents should they should arise
2. Identification: Determining whether an event is indeed a security incident
3. Containment: Limiting the damage of the incident and isolating affected systems to prevent further damage
4. Eradication: Finding the root cause of the incident, removing affected systems from the production environment
5. Recovery: Permitting affected systems back into the production environment, ensuring no threat remains
6. Lessons learned: Completing incident documentation, performing analysis to ultimately learn from incident and potentially improve future response efforts

An incident response plan can benefit an enterprise by outlining how to minimize the duration of and damage from a security incident, identifying participating stakeholders,

streamlining forensic analysis, hastening recovery time, reducing negative publicity and ultimately increasing the confidence of corporate executives, owners and shareholders. The plan should identify and describe the roles/responsibilities of the incident response team members who are responsible for testing the plan and putting it into action. The plan should also specify the tools, technologies and physical resources that must be in place to recover breached information.

Further, the plan should include an Incident Response Team that will execute the incident response plan and provide guidance to stakeholders on appropriate actions during the cyber incident. Whether large or small, post review of all incidents should occur so as to provide feedback and improvements to the Incident Response Plan.

Sample guidelines for both an IT Disaster Recovery Plan and a Security Incident Policy and related templates may be requested from the CCAP Technology Services through their CCAP CORE IT program.

<sup>1</sup> The **SANS Institute** (officially the **Escal Institute of Advanced Technologies**) is a private U.S. for-profit company<sup>[2]</sup> that specializes in information security and cybersecurity training.

### **(3) 0.5% Credit -- Education and Training**

Each PCoRP member shall have policies and procedures in place to provide education and training to new employees and for employees who transfer into a new position within the organization. New staff shall receive appropriate education and training on organizational policies and procedures in addition to the specific job related policies and procedures. PCoRP sponsors numerous opportunities for education and training that are appropriate for county staff.

The CCAP Insurance Program conducts approximately 40 educational workshops annually, located in Harrisburg, State College, Scranton, Cranberry, Lewisburg and other locations throughout the state. PCoRP is a sponsor of many of these workshops. Information about the workshops is published twice per year in a booklet titled *Glimpse*. Trainings include PCoRP Risk Control Workshops, PCoRP sponsored KEYS (Keep Educating Your Staff), Prison Risk Management Workshop, Maintenance Workshops, and the Personnel Workshop.

In addition, The National Safety Council, *Defensive Driving Course* (taught by NSC certified instructors) is presented by CCAP Insurance Programs several times during the year at various locations throughout PA.

Information about the workshops and registration instructions are also available on the CCAP website at [www.pacounties.org](http://www.pacounties.org). Most of the CCAP Insurance Programs' sponsored educational workshops are free to PCoRP members.

In order to claim the 0.5% premium discount for education and training it is necessary for the PCoRP member to participate in at least four (4) PCoRP sponsored education or training events annually. Each PCoRP sponsored event provides one credit for at least one staff member attending the educational workshop. The attendee should convey the information back to their employer. (A number of employees may attend the workshops, however only one credit is provided for each separate workshop). Participation in a minimum of four PCoRP sponsored events annually is required to claim the credit.

Alternatives for two of the four required educational events:



- Credit for one of the four educational events may be claimed by participation in the online safety training sponsored by CCAP Insurance Programs. An online class must be completed in order to qualify for the credit. For information about the online safety training sponsored by CCAP Insurance Programs, please contact your risk control specialist.
- Additional alternative for two of the four required educational events is attendance at:
  - Local Court Security Committee Workshop sponsored by the Administrative Office of PA Courts (AOPC),
  - SCHRPP workshops sponsored by the Society of Human Resources Professionals of PA, and/or
  - Other safety or risk control educational opportunities may be may be accepted with proper documentation and prior approval.
  - Credit for one of the four educational events may be claimed by hosting a formal CCAP Risk Control training session for county staff.

Therefore, a minimum of two PCoRP sponsored educational events would be acceptable for credit plus two credits claimed for other educational opportunities as indicated above.

#### (4) **Sexual Harassment Policy**

The PCoRP Member shall have sexual harassment policies and procedures. Training regarding the sexual harassment policies and procedures should be conducted annually and during orientation of new personnel. All staff should receive training including management, supervisors and operational staff. The sexual harassment policies and procedures should be reviewed by legal counsel at least every two years to insure they meet the current federal standards. Legal review should be indicated on the document with the name and date of the reviewer. The PCoRP Sexual Harassment Sample Policy may be the basis of the county or entity policy, or equivalent as approved by legal counsel.

State and federal statutes apply:

Title VII of the Civil Rights Act of 1964 prohibits employment discrimination on the basis of race, color, sex, age or national origin. Sexual harassment is included among the prohibitions.

Sexual harassment, according to the Federal Equal Employment Opportunity Commission (EEOC), consists of unwelcome sexual advances, request for sexual favors or other verbal or physical acts of a sexual or sex based nature.

#### (5) **0.5% Credit – Prison Policy Review**

Annual review of prison policies and procedures should be conducted by the Board providing direction to the prison, the prison solicitor or the top administration of the prison. Review should determine if the policies and procedures meet PA DOC guidelines as well as other state and federal guidelines. The suicide prevention, intake evaluation and classification, strip search policies and use of force policies shall be reviewed as well as all other prison policies. Documentation shall indicate when the policies are reviewed and by whom. Changes in the prison facility may require changes in the policies and procedures. **Add PREPARE report??**

ACA Accreditation: In lieu of the annual review of prison policies, credit may be claimed for American Correctional Association (ACA) Accreditation. Please submit a copy of the Accreditation Certificate with the PCoRP Risk Control Incentive Program Report.

#### (5A) **0.5% Credit – Alternative**

If the PCoRP Member has no jail or prison facility, there is an opportunity to receive the alternate credit. The Member may develop and implement a special Risk Management or Risk Control Program to control specific hazards or exposures that are not otherwise addressed in the regular safety program activity. The alternate program shall be submitted to PCoRP for approval. PCoRP approval will enable the 0.5% alternate credit. (The request for approval shall be submitted with the PCoRP RCIP Renewal report, or submitted prior to the report for evaluation).

#### **(6) 0.5% Credit – Prompt Claims Reporting**

PCoRP claims staff shall be notified of reportable incidents within the following time schedule.

- Within 24 hours of any death,
- Within two business days for all automobile loss claims,
- Within five business days for all other losses

This reporting standard shall be met for 90% of all PCoRP claims to receive credit. Note: Lawsuits served upon the county are not considered within the *Prompt Claims Reporting* calculation.

All claims and report of potential loss incidents shall be submitted online using the systems for online reporting provided by the CCAP Insurance Programs.

#### **(7) 0.5% Credit – Vehicle Safety Program**

The PCoRP Board recommends that the following *Vehicle Driver Policy* be accepted by the county or integrated into the county's vehicle driver policy. The PCoRP Board recognizes that some sections of the policy may conflict with existing collective bargaining agreements. If a member county cannot implement the policy, it is requested that a written statement indicating the reasoning and a copy of the county's vehicle policy be submitted to the PCoRP underwriting staff.

1. All drivers must be at least eighteen years of age.
2. All drivers must have a current, valid Pennsylvania driver's license that covers the type of vehicle operated. A copy of the license shall be placed in the driver's personnel file. A motor vehicle report (MVR, a report from the state driver licensing agency) should be obtained on all newly hired drivers and on county staff whose transfer in position requires driving.
3. Drivers with a conviction of DUI/DWI or reckless operation shall not be permitted to operate a county vehicle.
4. Drivers with two or more convictions as reported on the MVR shall be placed on driving restriction. Convictions include moving violations, DWI, or non-preventable (at fault) automobile accidents. An individual placed on driving restriction shall be required to complete a remedial driving or defensive driving course. Proof of course completion shall be submitted to the PCoRP underwriting staff along with a request from the county for reinstatement of normal driving privileges. The PCoRP Board, Underwriting Committee or staff may review the request and recommend that the county employee driving privileges be reinstated or to be placed in a non-driving status for a specified period of time.
5. Drivers with four or more convictions, as stated on the MVR, within a twenty-four month period should be prohibited from operating county vehicles. This includes DWI, or DUI, moving violations and non-preventable accidents.

6. Drivers who use their own vehicles on county business must comply with #1 and #2 above plus have valid state vehicle registration in addition to #7 below.
7. Drivers who use their own vehicles on county business should be required to offer proof of insurance on an annual basis. It is recommended that all drivers carry the following minimum limits of liability of \$100,000/300,000/50,000 or combined single limit of \$300,000. These limits are suggested for the protection of the employee while on county business. All employees shall immediately report to the county any change in their driving record or cancellation of their auto insurance, within five days of the incident, conviction, or cancellation
8. A copy of the driver's valid PA Driver's License shall be maintained on file in the human resources or personnel department. All drivers who use their private owned vehicle shall also provide a copy of the valid PA vehicle registration and proof of insurance to be maintained on file.

In order to claim credit for the vehicle safety program, two items are necessary as follows:

- Written policy outlining the driver history program
- Written policy or summary of the vehicle safety program

A copy of the written policy may be requested to substantiate the fulfillment of these programs.

Driver history (aka Motor Vehicle Report or MVR) should be obtained on all staff that drives county owned vehicles and/or private owned vehicles as part of their employment. Many who drive their private owned vehicle are meeting with and transporting clients. This expands the liability exposures beyond county owned vehicles. For purposes of this program the driver history report will be known as an MVR.

**Request a MVR from PennDOT** for all employees who may be required to drive as part of their employment responsibilities. When first starting the program, it is suggested that all new hire employees have an MVR as part of the background investigation for employment. Employees who change position and are required to drive as part of the new responsibilities should have an MVR check. All other employees who regularly drive for business should have an MVR obtained within the first year of starting the MVR program. A new MVR should be obtained for any driver who has had a collision, a crash, or a motor vehicle citation. The county or employer should develop a policy that specifies when to obtain a MVR and all staff should be required to comply.

A policy should be developed outlining how a MVR should be interpreted and what constitutes discipline, suspension or termination of their driving privileges. All drivers should have a valid driver's license; therefore the suspension or revoking of a driver's license will prohibit an employee from driving on county business. The policy should specify the criterion that would prohibit an employee from driving a county vehicle or driving on business.

In addition to the MVR, the safety program should include education and training for drivers, a vehicle maintenance program, an accident/incident review program and other components of a viable vehicle safety program.

**The guidelines for a vehicle safety program and ordering driver MVR's from PennDOT may be requested from the Risk Control staff.**

**(8) 0.5% Credit – Internal Financial Controls**

Develop and implement policies and procedures to control money handling and control the potential of embezzlement. Control procedures should apply to all internal money handling, as well as internal audits and external audits. Notice of any money losses or potential embezzlement should be reported to PCoRP claims as soon as it is identified. Evidence of the activity may be documented by the presence of written policies and/or procedures to control embezzlement. The policies and procedures or a summary may be requested to substantiate the program incentive.

**RISK MANAGER CREDIT**

The board of directors of PCoRP approved the risk manager credit in April 2009 and updated the credit in January 2012 and March 2016. To encourage the counties to have a full time dedicated risk manager on staff, an additional credit has been established. Frequently the risk management administration is accomplished by the chief clerk or other county staff among many other duties. The board of directors and staff of PCoRP consider having a full time dedicated risk manager to be a very valuable professional staff position within the county that they have offered a premium discount. In order to claim the risk management credit, a copy of the risk manager's formal job description shall be sent to PCoRP staff for approval of the discount. 5% of the loss fund will be credited if there is a full time risk manager on staff with sole responsibility and dedicated to the position of risk manager. As an alternative, 2.5% credit will be provided from the loss fund for a risk manager on staff having 50% or more of their time and responsibility dedicated to risk management. The 50% time consideration shall be stipulated on the job description or accompanying documentation to qualify for the discount. A copy of the risk manager job description shall be approved by PCoRP to authorize the discount.

A member naming a risk manager during the policy year will not receive a full credit for either a full time or part time risk manager, but will receive a prorated return of premium from the date of approval of the Risk Manager's position.

**RISK CONTROL INCENTIVE CREDIT REPORTING****Credit Computation**

Each of the items, number #1 through #8, may receive a credit of 0.5% for a maximum PCoRP credit of 4%, to be deducted from the loss fund contribution of the following policy year. The report of the credit claimed shall be submitted with the underwriting information provided for renewal. The credit is computed for activity accomplished within the 12 months prior to the submission of the report.

The PCoRP Risk Control Incentive Program Report is subject to audit. If the program guidelines are not implemented completely, the claimed credit may be rejected. Such changes may affect the discount from the loss fund contribution. The unauthorized credit will be billed to the PCoRP Member or may be applied to loss fund contribution in following years.

**MEMBER NONCOMPLIANCE**

Failure of a member to implement any of the following items may result in sanctions to be imposed on the member by the PCoRP Board.

1. Failure by a member county to correct risk control recommendation deficiencies that could reduce potential for loss.
2. Failure by a member county to implement risk reduction and control measures.
3. Failure of a member county to adopt and implement an effective incident reporting system.
4. Failure by a member county to report all incidents which could result in a claim.

5. Failure of a member county to appoint/name a risk control coordinator/safety coordinator.
6. Failure of a member county to implement a self-inspection hazard identification and reduction program.

The PCoRP staff (CCAP Insurance Programs Staff) may provide notice of member noncompliance to the PCoRP Underwriting Committee and/or the PCoRP Board. The PCoRP Board will evaluate the facts and circumstances relative to the member noncompliance and impose appropriate sanctions on the member as necessary.

**PCoRP Risk Control Incentive Program Notice**

PCoRP may visit and perform a survey of your premises, equipment, or operations solely for the purpose of supporting the function of risk underwriting. Recommendations are not intended as substitutes for advice from safety experts or legal counsel which you may retain for your own purposes. Further, compliance with recommendations in no way guarantees the fulfillment of your obligations as may be required by any local, state or federal laws and regulations.

## **CONTACTS FOR QUESTIONS OR ASSISTANCE**

[www.pacounties.org](http://www.pacounties.org)

### Risk Control Staff

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