

INTELLIGENT RISK MANAGEMENT

Seven Practical Steps to a Strong Risk Culture & Financial Maturity

By Mark R. Bennett, Jack Ogutu and Richard Olawoyin

A COLLABORATIVE RISK RESEARCH PARTNERSHIP between Millersville University, Oakland University and Risk Innovation Group reached a 4-year milestone. This study was initiated to explore solutions to many long-standing risk practices that are either not working or are slow in producing positive employer outcomes.

This initiative was founded on the premise that large employers face the most challenges. With this burden, they often have greater resources to introduce and pilot new processes. Although the emphasis of this research is on large employers, research and studies include a cross-section of employer sizes. The objective is to leverage data from the most complex employer to develop new or innovative practices that will support improved processes applicable to any size employer (scalability).

This research brought attention to the complexities of organizations and the need for alternative solutions (Ogutu, Bennett & Olawoyin, 2018). Organizations represent complex puzzles in that every business process area, organizational goal, strategic and geographic initiative, compliance area, and virtually every part of an organization holds risk. In addition to those in plain sight, organizations are susceptible to emerging risks.

Organizations face natural challenges when people are confined within its four walls. Organizations develop silos and politics that add to the complexities. Silos are groups of people put together for a dedicated purpose that move toward working independently. Politics are the people in organizations positioning for personal agendas that may or may not align with the organization's best interests.

These and other complexities support the notion that safety programs must learn how to function in complicated environments. Those in the safety profession must embrace the structure that comes with architecture. Architectural work is typically associated with the construction of buildings. Complex buildings begin with a vision to build something unique. The vision becomes the basis for the design work, which is transferred into a blueprint. The blueprint gets multiple parties working in the same direction.

Although organizations may be good at creating a vision that drives the design and blueprint of a building, the safety initiative, which arguably can be more challenging (moving people to action), typically does not approach developing a risk system from an architectural perspective.

Thesis & Development Work

The researchers developed a thesis to address the complexities associated with safety leaders' operations and functions. It states that if safety leaders apply the foundational concepts of architecture to building their platform, the structure will drive continuously improving results amid the complexities. Through the development process, the foundational components of architecture (i.e., vision, design, blueprint) can be transitioned into best practices for application.

The development work promotes the concept that a vision must mimic and have the accountability of any other business function in an organization. The design work promotes accountability to the safety system design through seven practical steps. These steps promote strategic operations, address human motivation through inclusive platforms, connect stakeholder roles and responsibilities, control and process a clear identity statement that is supported by financial and cultural baselines, and branding. Lastly, the development work promotes a tangible blueprint that is founded in enterprise risk management principles.

Industry participation on and contribution to the initiative has been remarkable. The "Use Cases" sidebar (p. 34) notes use cases

KEY TAKEAWAYS

- This article provides practical steps designed to make an immediate and sustainable impact on safety programs.

- It explains how leaders such as risk managers and OSH professionals can drive success to the elusive buy-in and ownership that risk programs struggle to obtain.

- It demonstrates how to use risk architecture to cut through the challenges and minimize the impact of obstacles.

USE CASES

Friendship Community Company that supports adults with developmental and intellectual disabilities; more than 400 employees; Lititz, PA; Robert Redcay, Director of Human Resources

Friendship Community introduced an employee-based initiative in 2019. Redcay identifies his initiative as a bottom-up platform to connect to the heart rather than the mind that focuses purely on policies and compliance. He believes that close oversight, and reward and punishment models are not effective human motivators, and that they do not align with the organization's mission. When issues arise, he wants stakeholders to speak transparently and actively contribute to be part of the solution. Redcay established an identity statement, and roles and responsibilities that make this inclusive platform clear. He backed his commitment to the initiative by em-

powering Caleb Cunningham, associate director of facility services, in introducing processes and controls that support the identity. Cunningham has embraced this challenge and is putting this design work into a blueprint that is driving ongoing progress and accountability.

Accurate Protection Consultative commercial broker; servicing commercial employers; Atlanta, GA; Angie Reese, President

Reese is instrumental to advancing the seven practical steps by promoting and introducing risk architecture to employers struggling with standard top-down platforms. Within 3 months, she takes complex employers through a streamlined platform that introduces human motivation, a clear identity statement, roles and responsibilities, and controls and processes that support an inclusive identity. She facilitates

kick-offs, cultural baseline surveys, stakeholder engagement processes, and builds blueprints that are transitioned to employers for the ongoing management and continuous improvement of their risk systems.

BCF Groups Consultative insurance agency; servicing commercial employers; central PA; J. Brad Forney, President

Forney is an innovative agency owner who chooses to only work with clients that buy in to risk architecture. He recognizes the complexities employers face and commits to a structure that will improve them. His operation commits to impacting an employer's total cost of risk and risk culture. He supports design through the seven practical steps and has contributed to the university research initiative and the ongoing development and improvement of the process.

of companies taking the lead in supporting inclusion and structure based on risk architecture. The development of this initiative is additionally being supported by industry and student engagement. Employers are bringing their struggles directly to the classroom where students are challenged to add to the initiative and apply innovative thinking to support the development process.

Seven Practical Steps: Foundation

The seven practical steps are founded in risk architecture (Figure 1). For a safety system to successfully operate as a business function in an organization that holds many obstacles and connected relationships, there must be design. Effective design work comes from being clear on the vision (the endgame) that holds value. Obstacles are removed and opportunities become a reality when the vision and design work transition into a blueprint that stakeholders can follow and drives accountability to the endgame.

Vision

To gain respect and buy-in from executive teams, safety leaders must transition from operating as overhead to operating as a business function and be accountable to getting to the endgame. In safety, it is the leader's responsibility to get two metrics tracking in the right direction: total cost of risk (TCOR) and risk culture. To operate as a business function, leaders must be able to quantify and qualify these metrics so that there is accountability to progress.

The Design

The design work is straightforward and simply a matter of mechanics when the vision is set. If the only win is when the TCOR and risk culture are tracking in the right direction, risk leaders must think differently. Because the commitment is made to operate as a business function, design work is predicated on being transparent on what will work and not in terms of impacting financials and human motivation.

The Blueprint

If there is structure to a blueprint that feeds from a vision and design work, safety initiatives will have accountability to

continuous improvement. The blueprint is a map that shows stakeholders where the initiative is going, puts logic to decisions and accountability to controls and processes.

Seven Practical Steps: Detail

The following discussion outlines the seven practical steps in detail (Figure 2).

Step 1: Set Up a Platform to Operate Strategically

Operating strategically can be an organization's biggest return on investment. Safety is a process area that works and functions within the confines of the broader organization. Organizational executives operate businesses that have limited time and resources and have a business model to advance. Safety must fit into the broader organization and a platform must be established for tactical operations.

Three essentials to strategic operations include the risk register, the three lines of defense and the controls baseline. The risk register is about being strategic with data and putting attention and structure to what is most important. The three lines of defense are about being strategic with people; aligning people in the same direction with some level of motivation. The controls baseline is about being strategic with controls and making sure what you do connects to where you are going.

The Risk Register

The risk register is a structure for housing, organizing and prioritizing risk. Strategic leaders are purposeful and effective in creating platforms for stakeholders to provide their perspective on risk. If implemented correctly, stakeholders will freely provide perspective.

Employers working in complex environments should use a register to filter all risk to its root cause, which can then be transitioned into actionable plans. The register can be as simple as a spreadsheet that assigns risks into one of three levels: Level 3 is the highest grouping of risk defined; Level 2 is the second level of risk categorization; and Level 1 is the most specific categorization, which is the root cause. As safety leaders begin to build the register, they will soon notice that risk in their area is connected

FIGURE 1 RISK ARCHITECTURE FOUNDATION



to other process areas and that there are links to more global solutions. Safety initiatives cannot work independently of other process areas. Table 1 provides insight into the logic of a risk register.

Three-Lines-of-Defense Process

The three-lines-of-defense process is foundational to operating strategically. By embracing the three lines of defense, organizations group people logically so that large numbers of people can be in alignment and efficiently work in the same direction. When transitioning this process to a traditional risk management environment, the third line of defense is the executive point person, often the chief financial officer. The second line of defense is the person designated to oversee risk and that team. The first line of defense consists of the first-line process owners, typically the supervisors (Blunden & Thirlwell, 2010; Luburic, Perovic & Sekulovic, 2015; Woods, 2011).

The key is for safety leaders to be the facilitators, ensuring that the first-line defense (typically supervisors) get the support they need to be successful. Map out the three lines of defense and identify the people by name. Document the information in a spreadsheet that can be built on to make broader connections, such as identifying and tracking supervisors who have the most difficult area of focus, the most direct reports or the most incidents. The biggest return on investment will be when resource allocation is logical and supports improving the first line of defense.

Baseline

The baseline is like a road map. The risks that have been identified and the controls put in place to mitigate and avoid these risks are the building blocks that will tell the story and determine whether it is the right combination of activity. Having a structured and defined controls baseline (a logical accounting of all activities and controls in place) is essential to this process. The baseline is made up of the selected activities and controls to achieve the vision. The focus is not on how many controls are in place, but the effectiveness of the controls in achieving the desired result.

FIGURE 2 RISK ARCHITECTURE DETAIL

RISK ARCHITECTURE		
Founded in enterprise risk management principles		
Establish the vision (endgame)		
☒ Reduce total cost of risk ☒ Improve risk culture		
Design		Blueprint
1	Set up a platform to operate strategically Define baseline (controls) Establish three lines of defense (people) Maintain a risk register (data)	Tab 1: Total cost of risk baseline Tab 2: Risk culture baseline Tab 3: Control activity baseline
2	Determine your position on human behavior Review options, select engagement (top-down, middle, bottom-up) <i>A culture of inclusion for frontline employees</i>	Tab 4: Three lines of defense Tab 5: Risk register Tab 6: Plan description and detail
3	Build platform of inclusion into your identity	Tab 7: Indexes and reasoning
4	Design roles and responsibilities for all stakeholder groups to support the identity	Tab 8: Monitoring
5	Design controls and processes to fit the identity	Tab 9: Incident management Tab 10: Change management
6	Develop risk financial and cultural baseline, and set annual improvement goals	Tab 11: Claims management
7	Brand the identity so it is known	Tab 12: Cost allocation system

TABLE 1 RISK REGISTER EXAMPLE

Adding structure to a tiered drill-down process guides stakeholders to find the root cause of an issue, as opposed to continuously chasing symptoms.

Level 3	Level 2	Level 1: Root cause
People	Supervisors buy-in and participation	Leadership skills/lack of relevant training
Process	Frontline staff competencies; new hires	Screening and hiring process
Process	Middle management buy-in and participation	Roles and responsibilities not clearly defined
People	Teamwork and communication	Supervision; effective planning and scheduling
People	Lack of buy-in	Lack adequate engagement opportunities
People	Fatigue	Driving time to and from work and rushed environments
People	"Don't care" attitude	Top-down, noninclusive environment
Relationship	Contracts	Accurate description of the relationship is not verified
Process	Goals and objectives	Strategic and operational activity not aligned
People	Rushed environments	Inadequate staffing

FIGURE 3 IDENTITY STATEMENT

Step 2: Determine Your Position on Human Behavior, Embrace Inclusion

When safety is run as a business function that has accountability, liabilities and responsibility, human motivation must be part of the equation. Leaders cannot expect to tap into buy-in and ownership if they bypass human motivation and go straight to controls and practices.

The options are straightforward: top down, bottom up or somewhere in the middle. On the top-down end of the spectrum, the focus is on a management-driven program; on the bottom-up end of the spectrum, the focus is on an employee-based program. Safety managers will achieve buy-in and ownership from frontline stakeholders to the extent that they move toward the bottom-up end of the spectrum.

Top-down initiatives are off the shelf; it is easy to follow a template that other leaders are incorporating, and risk leaders have been operating under these platforms for many years. Bottom-up initiatives, however, take into consideration thought and design. With these bottom-up platforms, safety managers transition from compliance forcing to an inclusive environment.

A bottom-up approach shifts from fear-based to support-based controls (Sussman, Jin & Mohanty, 2016); it asks for feedback and captures perspectives and ideas from those closest to the front line. It is about tapping into an atmosphere of belonging, collaboration and actively seeking opportunities for stakeholder engagement. It gives stakeholders an opportunity to be part of something bigger and to contribute to solutions. It looks for ways to empower and sets the stage for employees to speak transparently.

Walk a few miles in the shoes of frontline stakeholders. What side of the spectrum would motivate you? Geller (2000) postulates, "When people know what is expected, yet perceive some personal control in how to achieve those goals, they are more likely to own the process and transition from an other-directed to self-directed mindset."

Step 3: Build an Inclusive Platform Into Your Identity

As a safety manager, if you choose to move people to action by including them in the process and you are transitioning away from the standard top-down approach to inclusion at all levels, stakeholders must know this. In the beginning, stakeholders will have questions and be confused about how you expect them to engage and how they can contribute. Most employees are accustomed to seeing management put controls and processes in place and closely policing them, so the concept of making employees part of the process may seem foreign to them.

The start of transitioning from a top-down approach toward inclusion is creating an identity statement that clearly defines intentions. The identity is as much about the leader as it is about the frontline stakeholders.

For the risk leader, the identity is his/her performance accountability. The identity statement outlines in clear terms what is important to the safety initiative (i.e., the belief, the value, the how). The identity statement declares what the leader is responsible to make happen; it is the leader's job description.

For employees, the identity is a view of the risk leader's plan to solicit support from all stakeholders, especially those closest to the front line. It sets a vastly different set of expectations.

In an inclusive platform, what is defined in the identity statement will drive stakeholder roles and responsibilities as well as controls and processes. Figure 3 is a template to get started. Make it concise and say it in one page.

What is your story—your identity—that will tap into human motivation? How will you include stakeholders in the safety initiative?

[EMPLOYER NAME]

Important information pertaining to [employer name] safety program:

We believe:

What we value:

How will an employee-based program play out?

How will we create an environment of support?

See attached roles and responsibilities that are our road map to success. Every employee has a responsibility to contribute and participation is needed. We believe that by empowering employees to drive our vehicle program, expectations will be exceeded.

[Name], President

[signature]

Step 4: Design Roles & Responsibilities to Fit an Inclusive Identity

If you are bold enough to choose an inclusive identity that supports participation from stakeholders at all levels, the roles and responsibilities of each stakeholder group must be defined.

In an inclusive platform, all stakeholders in the organization have a part in the safety initiative. This aligns closely with the three lines of defense: the third line (executive point person), the second line (risk leader and team) and first line (operational managers and supervisors). These three lines of defense are in place to support the company's most important assets, the front line. All stakeholders have unique roles and responsibilities pertaining to an inclusive initiative.

For example, the risk leader and team will have different responsibilities based on the position taken on human behavior and identity statement. If top down is chosen, the focus will be compliance. The base activities will be creating awareness, training on techniques and extending a repeated message on policies. The day-to-day activity is policy making, training on policies and policing them. On the other end of the spectrum, if the focus is bottom up and an inclusive environment for all stakeholders, the focus is engagement, which brings a different set of responsibilities.

In inclusive platforms, base activities are tapping into the third drive (autonomy, mastery and purpose) and facilitating contributions and solutions. The day-to-day activity is providing efficiency to stakeholder contributions, transitioning ideas into solutions and stakeholder feedback. The concept is simple: People are more willing to accept what they help create. Rather than developing more controls to watch over stakeholders, the time and resources shift to making them part of the process.

Rules and responsibilities must be more than just words. Talk to stakeholders about your vision on roles and responsibilities before

TABLE 2
THE BLUEPRINT

Create the platform for: ☒ Risk continuous improvement ☒ Risk continuity
Spreadsheet workbook: Structure to the process

Tab 1: Total cost of risk baseline	Accountability to risk financials. Identifies all components of a risk program and puts them in a format so that goals can be set and progress tracked year over year.
Tab 2: Risk culture baseline	A survey that provides a starting point for continuous improvement in a company's culture. Captures stakeholder perspective on employer's identity statement. Focuses on core commitments made in the statement and asks stakeholders 1) if they agree with the statement; and 2) if the statement matches reality. Sets the stage for an annual survey (stakeholder contribution) and goal setting.
Tab 3: Control activity baseline	Being strategic with control activity. Making sure what is done connects with where the initiative seeks to go (identity). Puts all control activity in a document that serves as a bird's eye view and baseline for continuity, continuous improvement and change management.
Tab 4: Three lines of defense	Being strategic with the people of an organization. Aligning people to work in the same direction with a level of motivation. Divides people into three groups that align with 1) the executive point; 2) the risk leader; and 3) the first line process owners.
Tab 5: Risk register	Puts structure to what is most important. Deals with having structure to data collection, housing and organizing risk, driving to the root cause and prioritizing risks. The goal is to create structured plans to make risk actionable.
Tab 6: Plan description and detail	Defines the purpose and objective to a structured plan. Defines the goal and direction of the plan. The basis for accountability; provides a road map for stakeholders.
Tab 7: Indexes and reasoning	Speaks to a rating process to make apples-to-apples comparisons and logic-based decisions on limited time and resources. Provides reasoning that supports continuity of employer risk systems.
Tab 8: Monitoring	Speaks to test, metrics and incident management to make sure what is most important happens.
Tab 9: Incident management	Speaks to applying structure and logic to incidents. Speaks to collecting and using the data for future prevention and mitigation.
Tab 10: Change management	In place so that safety initiatives can evolve with the company's changing environments. Must be in place to get the right combination of controls to get results.
Tab 11: Claims management	Involves multiple stakeholders working together efficiently. The processes are documented in line with the core categories/area of responsibility. The objective is process improvement.
Tab 12: Cost allocation system	Motivation, engagement and accountability at an operation manager's level. Takes results from a risk program and allocates outcomes in a way that makes sense to a financial person with the end goal of adjusting activity to drive positive results.

introducing them. What is the perspective of stakeholders? Are the roles and responsibilities realistic? Do concerns and obstacles exist?

Companies are complex. No one needs roles and responsibilities that are only words that no one can realistically accomplish. Establishing roles and responsibilities that are achievable is a team effort that includes perspective from those responsible to perform them.

Step 5: Design Controls & Processes to Fit an Inclusive Identity

As safety leaders shape an inclusive platform that includes the front line, they will need to add controls that keep this engine running smoothly and efficiently to support the identity statement. The first challenge is how to get engagement and a representative perspective from the employee base. This will take thought that will translate into targeted controls. Standard top-down compliance does not generate controls that support frontline stakeholder participation in solutions and ongoing engagement. Of course, including stakeholders in this control-developing process is always a good idea.

Additionally, creating a voice and transparency about the challenges in an organization does not naturally happen. Structure and controls must be put in place to give stakeholders an opportunity to speak openly about obstacles and opportunities.

A risk leader's work to shape an inclusive environment may be different and unfamiliar. Leaders who embrace an inclusive identity typically spend more time with human resources, mid-level managers and other stakeholders to engage, promote and solicit support.

Step 6: Develop & Track Risk Financial & Cultural Goals That Set Expectation for Incredible Outcomes

When putting a bottom-up platform in place there must be a method to measure success. In the hazard risk space, safety leaders can easily determine whether the risk system (engine) is working by tracking two foundational metrics. Are the company's TCOR and risk culture tracking in the right direction? TCOR is straightforward; it is all the financial components that make up annual costs. Risk culture is a matter of putting structure to gathering feedback on whether stakeholders agree with the identity statement and learning their perspective on how the company is doing and living up to the commitment in the identity statement.

Metric 1: Total Cost of Risk

You want the TCOR to be continuously tracking down. First, capture the financials. Chief financial officers will typically

track this, but it needs to be the risk leader's responsibility as well. Identify every expense item that makes up the TCOR and track it year over year. If not currently tracking this, create a spreadsheet and fill in data for the past 4 years.

Second, set an aggressive goal that will outperform the previous year. This is part of being viewed as a business function. It is not a time to sandbag. Set the expectation for the program to improve and use this as a basis to measure success.

Metric 2: Risk Culture

Risk culture should continuously track up positively. The easiest way to do this is to establish the baseline culture. For example, if the identity statement supports an inclusive environment, ask how the company is doing. Do stakeholders feel included and is their opinion valued?

After creating an identity and supporting it with roles and responsibilities, and controls and processes to make it happen, it is time to do a survey of stakeholders to get a baseline. Ask stakeholders to be honest and transparent about how the program measures up against the identity or vision. Ask questions pertaining to each part of the identity statement. Use these results as a base and conduct the same survey annually to track progress.

Step 7: Brand the Identity So It Is Known

Companies are complex and busy, and hold many risks outside of what is happening in the traditional safety (hazard risk) space. Getting stakeholders' attention and getting the right amount of time and resources applied to the hazard risk process area requires making your vision known. The identity will have little value if no one knows about it and they cannot connect.

If transitioning from a top-down to a bottom-up and inclusive platform, it is important to get the message out. Part of branding is including stakeholders and giving them an opportunity to contribute. This is an ongoing commitment. Accept feedback before introducing new controls and processes that will affect stakeholders.

Branding is not a one-time effort. It involves visuals, voice, clarity on values and multiple avenues to get the message out. Typical examples in this area are slogans, kick-off meetings, corporate safety videos and brochures.

The Blueprint

Creating a blueprint is a risk leader's most valuable activity in moving the vision forward. The blueprint captures the accountability that is so elusive in safety initiatives. It is about putting structure to processes to ensure that progress is made and good things happen that all stakeholder groups can celebrate. Essential elements of an effective blueprint are described in Table 2 (p. 37).

Although some use sophisticated software, a structured blueprint can be as simple as a spreadsheet workbook. Three tabs of the workbook should cover the essential baselines. One cannot track progress, properly engage continuous improvement or embrace change management without an ongoing starting point. A baseline is essential in terms of 1) the controls (activity you do every day) that make up the risk system; 2) the financials that make up the annual cost; and 3) the employee perspective that drives the culture.

Moving forward, if one builds structure to a formal safety plan and incorporates basic accountability to foundational components of the plan, continuous improvement and continuity will be built in. Essential to the structure are a plan description, the three lines of defense, monitoring process, incident management, change management, claims management

process, a cost allocation process and an effective rating process that supports logic to decision-making.

Safety systems involve multiple stakeholders in complex environments. Think of the blueprint as a tangible document you can lay on the table of the construction job trailer to align all relevant stakeholders and subcontractors in the same direction.

Conclusion

Just as work crews do not simply arrive on the jobsite to build complex buildings, safety systems do not just happen. They are a product of a leader's vision, design work and a blueprint. Risk architecture is a requirement of being a leader.

In complex environments, the instinct is to lead through top-down programs fueled by policies and compliance. Intelligent risk management speaks to transitioning to platforms fueled by inclusion and structure.

The research and development work show that stakeholders want to be engaged and respect accountability at all levels. They are not looking for accountability that is driven through the fear of some form of punishment or not getting a reward, but rather through the structure that supports both risk systems and all stakeholder groups improving. Mastery of process is powerful. By building in accountability to process through a spreadsheet workbook founded in enterprise risk management principles, risk systems will improve, and this built-in positive accountability will drive strong cultures.

The work is only hard when a leader chooses to take on the complexities (obstacles and opportunities) alone. Intelligent risk management is about operating the process area as a business function and getting results through inclusion and sustainable structure. **PSJ**

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Mark R. Bennett is founder and president of Risk Innovation Group. He specializes in the management and risk system design, and executive risk resources for the large employer, and is actively involved in ongoing risk research. Bennett holds a B.S. in Personnel Management with a minor in Economics from Indiana University of Pennsylvania.

Jack Ogutu, Ph.D., CSP, is associate professor and program coordinator of the occupational safety and environmental health program in the Department of Applied Engineering Safety and Technology at Millersville (PA) University. He earned a Ph.D. and an M.S. in Industrial and Systems Engineering with a concentration in Occupational Safety and Ergonomics from Auburn University. Ogutu is a professional member of ASSP's Central Pennsylvania Chapter.

Richard Olawoyin, Ph.D., CSP, CEP, is associate professor of industrial and systems engineering at Oakland University. He has worked in the petroleum industry as a geologist, geophysicist, petroleum engineer, safety and environment health scientist, in both the upstream and downstream oil and gas sector. Olawoyin is a professional member of ASSP's Greater Detroit Chapter and serves as Assistant Administrator of the Environmental Practice Specialty.