## Leadership Commitment

Cultural Transformation

Process and Systems

Results

# 2020 STEP APPLICATION



Proud Sponsor of the ABC National Safety Excellence Award



## 2020 STEP APPLICATION FORM (Want to save money? Apply online at abc.org/stepapp)

Note: <u>ALL</u> paper applications <u>MUST</u> include payment of the \$35 application processing fee

#### SECTION 1: COMPANY INFORMATION

Company Name:	
Address:	
City:	State: ZIP:
Contact Name:	
Email:	
Chapter:	
This application <u>and data</u> :  — Represents entire company	
□ Represents specific location, dept. or div.	Work Type: Residential% Commercial%
Is this IDENTICAL STEP application being used for other ABC chapters?	Industrial% Public works/Military% Percentage of work performed: <100 miles of HQ%
	Within 101-250 miles% >250 miles%
Are you a contractor or a supplier? $\Box$ Contractor $\Box$ Supplier	Percentage of your contract work: Self-performed%
Primary NAICS Code (as entered in your OSHA 300A)	Sub-Contracted%
Annual volume (work in place): Do you use STEP as a pre-qualifier?	
SECTION 2: SAFETY PERFORMANCE DATA Refer to your 2019 OSHA FORM 300A for	items (a) through (h)
a. Total number of DEATHS (line G on the OSHA 300A)	
b. Total number of CASES with days away from work (line H on the OSHA 300A)	
c. Total number of CASES with job transfer/restriction (line I on the OSHA 300A)	
d. Total number of OTHER RECORDABLE CASES (line J on the OSHA 300A)	Do you conduct a daily task specific safety process, aka a Jobsite Safety Analyses (JSA) / Jobsite Hazard Analyses (JHA)?
e. Total number of DAYS away from work (line K on the OSHA 300A)	Do you track good catches/potential significant events?
f. Total number of DAYS of job transfer or restriction (line L on the OSHA 300A)	$\Box$ Yes $\Box$ No If yes, how many did you record in 2019?
g. Annual average number of employees (as entered in your OSHA 300A)	Toolbox safety talks frequency: Daily Weekly Bi-weekly Monthly Other
h. Total hours worked by all employees (as entered in your OSHA 300A)	Do you establish/participate in site safety committees at most jobsites? $\Box$ Yes $\Box$ No
Incidence rate = $\frac{(a + b + c + d) \times 200,000}{h}$	Do you conduct safety training for employees beyond owner/user-required training? □ Yes □ No
Experience Modification Rate as of Jan. 1, 2020 (EMR or "mod factor"– contact insurance company)	Do you conduct site specific orientations including training for specialty contractors?
Number of federal/state OSHA inspections in 2019	Have you signed the Drug- and Alcohol-Free Workplace Pledge at www.drugfreeconstruction.org? Yes No

\_\_\_ Repeat \_\_\_\_\_\_ Serious \_\_\_\_\_ Other than Serious \_\_\_\_ Willful \_ De Minimis \_\_\_\_

Do the numbers in letters A-H match the attached 2019 OSHA 300A?  $\Box$  Yes  $\Box$  No If no, please explain: \_

> 2 See reverse for 24 Key Components ——

**NOTE: REQUIRED FOR PARTICIPATION IN STEP!** 

#### SECTION 2: SAFETY PERFORMANCE DATA (Continued)

Please indicate the organizations your company uses for insurance brokerage, carrier, and insurance surety. (Check all that apply)

□ ACSTAR	🗆 FCCI Surety	$\Box$ Merchants Bonding Co	$\Box$ The Graham Company
□ Alliant Insurance	🗆 FICOH (First Insurance Co of Hawaii)	🗌 Morgan Marrow	🗆 The Guarantee USA
Arch Insurance	🗆 Hanover Insurance	□ Nationwide	$\Box$ The Hartford
🗆 Builders Mutual	🗆 Hudson Insurance	🗌 Old Republic Surety	The Nitsche Group
Captive Program	🗆 INSURICA	$\Box$ Philadelphia Insurance Companies	□ Travelers
□ CCI Surety	□ JW Surety Bonds	$\Box$ RLI Surety	□ Zurich
🗌 Chubb	🗌 Liberty Mutual	□ South Coast Surety	$\Box$ Other: (Please list company
🗆 CNA / CNA Surety	🗆 Marsh & McLennan	🗆 Surety One	

### SECTION 3: 25 KEY COMPONENTS SAFETY SELF-ASSESMENT

Use the self-assessment worksheet to calculate scores ...

. .. .

Leadership Commitment	Process
L1. Top Management Engagement	P1. Incident Investigations
L2. Safety Policy Statement	P2. Pre-planning for Project Safety
L3. Safety Responsibilities	P3. Emergency Response/Fire Elimination Plan
L4. Resources for Safety	P4. Task-Specific Safety Process
L5. Safety Program Performance Review	P5. Safety Rules
Culture	P6. Toolbox Safety Talks
C1. Employee Participatio	P7. Safety Inspections
C2. Substance Abuse Program	P8. Use of Personal Protective Equipment (PPE)
C3. Safety Program Goal Setting	P9. Recordkeeping & Documents
C4. Supervisor Safety Meetings	P10. Work Zone/Mobile Equipment/Vehicle Safety
C5. New Hire Safety Orientation	Results
C6. Employee Safety Training	R1. Leading Indicators
C7. Behavior-based Safety (BBS)	R2. Trailing Indicators
C8. Supervisor Safety Training	TOTAL

Initials here:

#### SECTION 4: COMPANY AND ABC CHAPTER CERTIFICATION

I certify that I have examined this document and that, to the best of my knowledge, the entries are true, accurate and complete.

Company Executive Name:

Title:

Signature: \_\_\_\_\_

All applicants MUST include a copy of their 2019 OSHA Form 300A with application. STEP Diamond applicants and applicants under 100 employees using the STEP Gold, Platinum or Diamond three-year Incidence Rate Qualifier must include copies of OSHA 300A forms for 2017, 2018 and 2019. Companies with under 50 employees using the five-year incidence rate qualifier must include copies of OSHA 300A for 2015, 2016, 2017, 2018 and 2019.

To be filled out by ABC Chapter:
ABC Chapter Representative:
Signature:

I have read and understand all qualifying requirements and instructions.

🗆 No

#### STEP PAYMENT INFORMATION

STEP Platinum, \$235 \$\_\_\_\_\_ □ STEP Diamond, \$435 \$\_\_\_\_\_

□ Framed Certificates/Plaques (Platinum/Diamond only), \$50 X \_\_\_\_\_ = \$\_\_\_\_\_

□ Unframed Certificates/Plaques, \$15 X \_\_\_\_\_ = \$\_\_\_\_\_

Paper Application Processing Fee, \$35 \$\_\_\_\_\_

Total \$

Please enclose a check payable to ABC National

## FREQUENTLY ASKED QUESTIONS ABOUT THE STEP SAFETY MANAGEMENT SYSTEM

#### 1. Who should complete the STEP application?

STEP is a world-class safety system and safety benchmarking and improvement tool. ABC encourages each participant to engage as many employees as possible in the process. Where possible, consider using a safety committee or a randomly selected and diverse sample of employees. For each of the 25 Key Components of a world-class safety management system, groups can either work on reaching a consensus or results can be averaged. More participants in the evaluation process will result in a truer assessment of your safety program and a more comprehensive look at areas for improvement.

#### 2. What are the STEP achievement levels?

There are six levels of STEP achievement: Participant, Bronze, Silver, Gold, Platinum and Diamond.

#### 3. When is the STEP application due?

STEP applications are accepted throughout the year. However, in order to ensure receipt of your STEP certificate and achievement recognition at your chapter's safety awards ceremony, applications should be submitted online or returned to your local ABC chapter office by the chapter's STEP deadline. Check with your local chapter to see when your deadline is.

#### 4. Is there a fee to participate in STEP?

There is no application fee for STEP involvement at the Participant, Bronze, Silver or Gold recognition levels if you submit your application online at abc.org/stepapp. For all paper applications submitted, there is a \$35 application processing fee.

There is a fee of \$235 for each Platinum application submitted. This fee is only refundable if the application does not meet the minimum 25 Key Components qualifying score; any application submitted that does not qualify based on the Incidence Rate, Experience Modification Rate (EMR) and fatality qualifying criteria listed in the application instructions below WILL NOT BE REFUNDED. Payment information should be submitted with the Platinum application; failure to do so may result in processing delays.

There is an application review fee of \$435 for each Diamond level application. This fee is only refundable if the application does not meet the minimum 25 Key Components qualifying score; any application submitted that does not qualify based on the Incidence Rate, Experience Modification Rate (EMR) and fatality qualifying criteria listed in the application instructions below WILL NOT BE REFUNDED. In order to reduce processing delays, please review the STEP Diamond qualifying criteria to determine if your company will qualify for Diamond recognition prior to submitting your application.

## 5. Is the information submitted in my STEP application confidential?

Yes. The information contained in each STEP application is viewed only by ABC staff and is kept strictly confidential. ABC does not disclose any company-specific STEP information. ABC accumulates aggregate data through the program to determine collective safety trends and this information becomes part of ABC's annual STEP data analysis, which serves as a member benchmarking tool.

#### 6. Does ABC National keep a copy of the application?

ABC National retains copies of all paper STEP applications for a period of five years and then destroys them. Information from all online applications is stored in ABC National's database in perpetuity.

## 7. Does STEP participation tie into other ABC recognition programs?

Yes, ABC has two recognition programs that tie into STEP participation:

National Safety Excellence Award (NSEA) – Companies applying for the 2020 National Safety Excellence Award must have participated in STEP at the Gold, Platinum or Diamond level in 2020.

Accredited Quality Contractor (AQC) – Companies seeking AQC status must have participated in STEP at the Gold, Platinum or Diamond level during the previous or current year.

Excellence in Construction Awards (EIC) – Neither AQC status nor STEP Gold, Platinum or Diamond recognition are required for submitting an entry in ABC's national EIC awards program. However, EIC applicants with AQC status do earn an additional two points in the judging process.

#### 8. Who do I contact if I have questions?

Contact your local ABC chapter first. If the chapter is unable to provide the specific information you need, or if you are referred to the ABC National office, contact Amy Faris, manager of safety programs and initiatives at (202) 595-1855 or faris@abc.org.

## 2020 STEP QUALIFICATION CRITERIA

#### **Participant Level**

- a) Recognizes those who participate in STEP, but do not achieve the minimum 25 Key Components self-score<sup>1</sup> required for Bronze-level recognition.
- b) Must submit 2019 OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for data verification purposes.
- c) Applicant must have signed the Drug- and Alcohol-Free Workplace Pledge at drugfreeconstruction.org and have in place a documented substance abuse program that includes a drug/alcohol screening process.

#### **Bronze Level**

- a) Minimum Bronze Level 25 Key Components self-score<sup>1</sup> required.
- b) Must submit 2019 OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for data verification purposes.
- c) Applicant must have signed the Drug- and Alcohol-Free Workplace Pledge at drugfreeconstruction.org and have in place a documented substance abuse program that includes a drug/alcohol screening process.

#### **Silver Level**

- a) Minimum Silver Level 25 Key Components self-score<sup>1</sup> required.
- b) Must submit 2019 OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for data verification purposes.
- c) Applicant must have signed the Drug- and Alcohol-Free Workplace Pledge at drugfreeconstruction.org and have in place a documented substance abuse program that includes a drug/alcohol screening process.
- d) Incidence rate no greater than 50 percent than the national BLS average for applicant's NAICS code for the two most recently published years of BLS data. (For companies with fewer than 100 employees, a three-year average may be used. For companies with fewer than 50 employees, a 5-year average may be used).<sup>5</sup>

#### **Gold Level**

STEP Gold is open to applicants who meet ALL of the following qualifications:

- a) Minimum Gold Level 25 Key Components self-score<sup>1</sup> required.
- b) Incidence rate<sup>2</sup> equal to or below the national BLS<sup>3</sup> average for applicant's NAICS<sup>4</sup> code for the two most recently published years of BLS data. (For companies with fewer than 100 employees, a three-year average may be used. For companies with fewer than 50 employees, a five-year average may be used).
- c) Must submit 2019 OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for data verification purposes.<sup>5</sup>
- d) Applicant must have signed the Drug- and Alcohol-Free Workplace Pledge at drugfreeconstruction.org and have in place a documented substance abuse program that includes a drug/alcohol screening process.

#### **Platinum Level**

STEP Platinum is open to applicants who meet ALL of the following qualifications:

- a) Minimum Platinum Level 25 Key Components self-score<sup>1</sup> required.
- b) Incidence rate<sup>2</sup> at least 25 percent below the national BLS<sup>3</sup> average for applicant's NAICS<sup>4</sup> code in the application year.<sup>5</sup>
- c) No fatalities or in-patient hospitalizations (except for observation and diagnostic testing) within this application year. Also, no fatality or catastrophic incident within the previous three consecutive years, which resulted in an OSHA citation.
- d) No serious, repeat or willful OSHA citations (federal or state) within this application year or the previous three consecutive years
- e) EMR ("mod factor") at or below 0.800 for application year (0.900 for companies with fewer than 100 employees). In some states, very small companies may have trouble reaching 0.900 even with three years of zero losses. Therefore, in place of the mod factor requirement, a company with fewer than 50 employees can meet this qualification if its three-year average workers' comp loss ratio is at or below 15 percent. A statement from your insurer must attest to this criterion.
- f) Applicant must have signed the Drug- and Alcohol-Free Workplace Pledge at drugfreeconstruction.org and have in place a documented substance abuse program that includes a drug/alcohol screening process.
- g) Submit the 2019 OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for data verification purposes.<sup>5</sup>

h) Submit the \$235 application fee, which is refundable if the company fails to meet the minimum 25 Key Components qualifying score. Any application submitted that does not qualify based on the Incidence Rate, Experience Modification Rate (EMR), substance abuse policy and fatality qualifying criteria listed in the application instructions below WILL NOT BE REFUNDED. In order to reduce processing delays, please review the STEP Platinum qualifying criteria to determine if your company will qualify for Platinum recognition prior to submitting your application.

All STEP Platinum recipients are eligible to enter ABC's National Safety Excellence Award (NSEA) competition and the Construction Users Roundtable's Construction Industry Safety Excellence (CURT/CISE) award competition.

#### **Diamond Level**

Candidates must meet ALL of the Platinum qualifications, as well as the following:

- a) Incidence rate<sup>2</sup> at least 50 percent below the national BLS<sup>3</sup> average for applicant's NAICS<sup>4</sup> code in the current application year and each of the past two consecutive application years.<sup>5</sup>
- b) EMR ("mod factor") at or below 0.700 for STEP application year (0.800 for companies with fewer than 100 employees). In some states, very small companies may have trouble reaching 0.800, even with three years of zero losses. Therefore, in place of the mod factor requirement, a company with fewer than 50 employees can meet this qualification if its three-year average workers' comp loss ratio is at or below 10 percent. A statement from your insurer must attest to this criterion.
- c) Submit the OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for years 2017, 2018 and 2019 for data verification purposes.<sup>5</sup>

d) Submit the \$435 application fee, which is refundable if the application does not meet the minimum 25 Key Components qualifying score. Any application submitted that does not qualify based on the incidence rate, EMR, substance abuse policy and fatality qualifying criteria listed in the application instructions WILL NOT BE REFUNDED. In order to reduce processing delays, please review the STEP Diamond qualifying criteria to determine if your company will qualify for Diamond recognition prior to submitting your application.

All STEP Diamond recipients are eligible to enter ABC's National Safety Excellence Award (NSEA) competition and the Construction Users Roundtable's Construction Industry Safety Excellence (CURT/CISE) award competition.

#### Appeals of STEP Level

In certain instances, a company may feel that the STEP qualification criteria cannot be reasonably met and unfairly prohibit their company from being recognized at the appropriate STEP level. A company may appeal their STEP level to the ABC National Safety & Health Committee, who will review the application and supporting materials to make a determination for or against the appeal. Please note that ONLY the following criteria may be the cause of an appeal at this time:

- Total Recordable Incidence Rate (TRIR)
- Experience Modification Rate

#### **PROVISIONAL STEP LEVEL (ONLINE APPLICATIONS ONLY)**

All online applicants will be notified instantly of their provisional STEP level upon submitting all required information. This is a provisional notification; final notification will occur when the STEP award is presented to the applicant upon review and confirmation of data by ABC National.

#### Notes:

 $1\,25\,$  Key Components Self-Score – ABC does not publish minimum qualification scores for the  $25\,$  Key Components.

2 Incidence Rate – Represents the number of OSHA recordable injuries/illnesses per 100 employees a company experiences in a given calendar year. It is calculated with the following formula:

Incidence Rate = N x 200,000/Total hours worked by all employees in calendar year

"N" represents the total number of OSHA recordable incidents for calendar year (Lines G + H + I + J on OSHA Form 300A)

The U.S. Bureau of Labor Statistics (BLS) has created an online Incidence Rate Calculator that may be accessed at http://data.bls.gov/IIRC/?data\_tool=IIRC.

- 3 BLS For purposes of this application, see Bureau of Labor Statistics averages in the table on page 9.
- 4 NAICS North American Industry Classification System. If you are unsure in which NAICS code your company should be classified, reference www.census.gov/eos/ www/naics/ for code definitions. NAICS code classification should represent the majority of the company's primary work. A sampling of construction NAICS codes and corresponding national BLS incident rates is listed in the STEP application instructions section.

5 Note that, for applicants under 100 employees who are submitting based on their three-year incidence rate average, you must submit your 2017, 2018 and 2019 OSHA Form 300A. For applicants under 50 employees who are submitting based on their five-year incidence rate average, you must submit your 2015, 2016, 2017, 2018 and 2019 OSHA Form 300A.

## **25 KEY COMPONENTS OF SAFETY SELF-ASSESSMENT WORKSHEET**

The 25 Key Components of an effective **world-class safety management system** is listed below. Each component contains columns that describe four levels of safety performance. Select the column that BEST describes your company's performance. Remember, each scoring column describes a set of actions/policies that your company currently undertakes. In order to achieve a score, your safety **program must contain ALL the listed criteria**. Any scores on the STEP application that do not match any of the four available scoring options in each of the 25 Key Components will automatically be rounded down to the nearest listed score.

## LEADERSHIP

#### L1. TOP MANAGEMENT ENGAGEMENT

12	8	4	0
<ul> <li>Owner/CEO/top management leadership directly and actively participates in the safety process</li> <li>Top management instills personal accountability for safety throughout the company</li> <li>Top management tracks and biannually reviews safety goals/objectives for the company</li> <li>Top management solicits continuous feedback on the safety process</li> <li>Top management commits resources (money, time, personnel, equipment, supplies, etc.) for the safety process necessary to achieve goals</li> <li>Safety performance is assessed in everyone's performance appraisal (executive and field employees)</li> <li>Top management integrates safety into every facet of company operation</li> </ul>	<ul> <li>Top management participates in the safety process</li> <li>Personal accountability for safety is expected, but there is little or no recourse if not demonstrated</li> <li>Top management is aware of safety process goals/ objectives, but does not track progress</li> <li>Top management provides the resources necessary for safety compliance</li> </ul>	<ul> <li>Top management supports safety, but does not actively participate</li> <li>There is little personal accountability for safety – a "just be careful" culture exists</li> <li>Limited funds are provided for safety</li> </ul>	<ul> <li>Top management is not involved in the safety process and demonstrates little interest in it</li> <li>Safety is left to supervisory personnel to handle "as needed"</li> <li>There is no accountability for safety</li> <li>Little or no funding is provided for safety</li> </ul>

#### L2. SAFETY POLICY STATEMENT

6	4	2	0
<ul> <li>Is in writing and is signed and by top management</li> <li>Is explained to employees at time of new hire orientation</li> <li>Explains the value of safety in the company</li> <li>Commits to protecting employees, continually improving the program, involving employees in the safety process and meeting regulatory obligations</li> <li>States universal accountability for safety in the company</li> <li>Is posted or part of employee safety policy</li> </ul>	<ul> <li>Policy exists and is in writing</li> <li>Policy is not explained to employees, but most know of its existence</li> <li>Explains employer's general commitment to a safe workplace</li> <li>Is posted, is part of the employee safety policy or is in the company safety manual</li> </ul>	<ul> <li>Policy exists, but is not posted nor in safety manual</li> <li>Not explained to employees and most do not know</li> </ul>	• No policy exists

#### L3. SAFETY RESPONSIBILITES

9	b	3	0
for everyone in the company, including defin • Specialty contractors. • Responsibilities include, but are not limited to, hazard and injury reporting, PPE use, safety policy compliance and all aspects of the GC/ owner's safety program. • Is in	oonsibility for safety is ned for everyone in company untability for safety is not ys universally applied ained to employees at time ew hire orientation writing and is part of loyee safety policy	<ul> <li>Responsibility for safety rests solely with a designated safety coordinator or safety committee</li> <li>Responsibilities are not in writing</li> <li>All employees know is that they are responsible for "being safe"</li> <li>There is little or no accountability for safety</li> </ul>	• Responsibility for safety has not been defined within the company

#### L4. RESOURCES FOR SAFETY

or promotion

6	4	2	0
<ul> <li>All safety resources (funds, time, personnel, equipment, supplies, etc.) are regularly budgeted or invested.</li> <li>Return on safety investment is tracked (actual or projected) to evaluate effectiveness</li> </ul>	<ul> <li>Reasonable resources are budgeted or invested in safety</li> <li>Supervisory personnel are generally aware of company resources available</li> </ul>	<ul> <li>Minimal investments are made in safety</li> <li>Money is taken from general funds as needed to react to safety needs (GC mandates,</li> </ul>	Resources are not made available for safety
<ul> <li>of resource allocation and to guide future expenditure decisions</li> <li>Resource funding and expectations are explained to supervisory personnel upon hire</li> </ul>		OSHA fines, incidents, etc.)	

#### L5. SAFETY PROGRAM PERFORMANCE REVIEW

6	4	2	0
<ul> <li>Top management reviews the safety program performance biannually</li> </ul>	<ul> <li>Top management reviews the safety program annually</li> </ul>	<ul> <li>Regular (pre-determined frequency) reviews of safety</li> </ul>	<ul> <li>No review of safety program performance is performed</li> </ul>
• The emphasis of the review is on whether the program is producing expected results and	• Some criteria exist against which performance is measured	program performance does not occur	
where opportunities for improvement exist	• Process is not documented	<ul> <li>Limited top management involvement—mainly left</li> </ul>	
Defined criteria exist against which performance is measured (e.g., safety surveys conducted, trainings held, incidence rates, loss ratios, progress toward annual goals, safety	Results do not significantly affect safety staff and/or supervisor evaluations	• to someone else (safety administrator, insurance company, etc.)	
meetings, OSHA inspection record, prevention of recurring incidents/ hazards, employee participation, etc.)	<ul> <li>Results are eventually discussed with safety staff and/or supervisory personnel</li> </ul>	<ul> <li>Subjective review of safety activities – mainly serves as a "year in review" and not an</li> </ul>	
Results are documented		assessment of performance and improvement opportunity	
<ul> <li>Results impact safety staff and supervisor annual performance evaluations</li> </ul>		• Results may or may not be	
<ul> <li>Following each review, meetings are conducted with safety staff and supervisory personnel to discuss results and expectations</li> </ul>		reviewed with supervisory personnel	

### **CULTURE**

#### **C1. EMPLOYEE PARTICIPATION**

9	6	3	0
<ul> <li>Employees are actively engaged in the safety process (e.g., safety surveys, hazard reporting, incident investigation, safety instruction, toolbox talks, policy development/auditing, new hire mentoring, committees, job safety analysis development, pre-planning, etc.)</li> <li>Supervisory personnel are aware of these opportunities and actively encourage employee involvement</li> <li>Participation opportunities are evaluated to ensure they are meaningful, necessary resources are available (time, money, staff, equipment, etc.) and potential barriers are identified and eliminated</li> </ul>	<ul> <li>Opportunities for employees to participate in safety process exist, but are not specifically documented</li> <li>Supervisors are provided limited training in soliciting employee participation, but nonetheless encourage involvement</li> <li>Employees may be aware of opportunities, but there are no specific participation expectations</li> <li>There is a limited focus on identifying and eliminating potential barriers to participation</li> </ul>	<ul> <li>Employees are encouraged to participate in the safety process, but no concerted</li> <li>efforts are made to engage them</li> <li>Employees are offered a general communication channel: "If you have any questions or concerns, speak with your foreman."</li> <li>An employee suggestion/ comment process is in place</li> </ul>	• There are no opportunities for employees to participate in the safety process

#### C2. SUBSTANCE ABUSE PROGRAM

6	4	2	0
• The company's safety policy explains its substance abuse program	• The company has substance abuse verbiage in the employee	• The company has substance abuse verbiage in its safety	• The company has no policy regarding substance abuse
The policy includes random, pre-employment and reasonable suspicion substance abuse testing	safety policy <ul> <li>Substance abuse testing is for pre-employment only</li> </ul>	manual <ul> <li>Drug/alcohol testing is inconsistent</li> </ul>	testing
• The policy is consistent and actively enforced	<ul> <li>The company makes a minimal effort to enforce policy</li> </ul>	• Company makes no or little effort to enforce the policy	
Supervisory personnel are trained in workplace     substance abuse recognition	• Supervisors are trained in	• Subcontract language does not	
<ul> <li>Employee substance abuse prevention education initiatives are offered</li> </ul>	hazards of substance abuse on the job	include compliance	
<ul> <li>The company has an employee assistance program (EAP)</li> </ul>	<ul> <li>Specialty contractors are contractually required to conduct pre employment testing</li> </ul>		
<ul> <li>The company keeps counseling and testing records</li> </ul>			
• Specialty contractors are contractually required to have programs equal to or exceeding the general contractors			

#### C3. SAFETY PROGRAM GOAL SETTING

9	6	3	0
• A formal process is in place to annually assess or establish safety program goals	<ul> <li>Safety program goals are established periodically</li> </ul>	<ul> <li>Informal or infrequent safety program goals are established</li> </ul>	• There is no process of safety program goal-setting
<ul> <li>Action plans are developed, documented and implemented to assure goals are accomplished in a timely manner</li> <li>Progression of action plans are tracked, with status reports and feedback from those assigned the tasks</li> <li>Top management reviews goals, action plans and status reports with staff to provide feedback, direction and support of initiatives</li> <li>Process is in place to evaluate degree of effectiveness action plan had in achieving end goal</li> </ul>	<ul> <li>A plan to achieve goals has been decided, but not documented</li> <li>Status of action plan is informally checked, but with no set frequency and with little follow-up or solicitation of feedback</li> <li>Top management plays minor part in safety goal-setting process</li> <li>No process is in place to gauge the effectiveness of the action</li> </ul>	<ul> <li>There is little or no documentation or employee knowledge of goals</li> <li>No realistic action plans are developed to accomplish goals</li> <li>Top management is not involved</li> <li>Goals seldom tracked, reviewed or achieved</li> </ul>	

plan in achieving end goal

#### C4. SUPERVISOR SAFETY MEETINGS\*

9	6	3	0
<ul> <li>The employer conducts weekly supervisor safety meetings</li> <li>The employer begins each meeting with a</li> </ul>	At least monthly, the employer conducts supervisor safety meetings	<ul> <li>Supervisor safety meetings are held occasionally (less than monthly)</li> </ul>	• The employer does not conduct supervisor safety meetings
<ul> <li>safety moment</li> <li>Meetings include:</li> <li>A dedicated safety training topic, rotated weekly</li> <li>pre-planning discussions</li> </ul>	<ul> <li>Meeting includes a status report on site safety activities</li> <li>Serious incidents are reviewed</li> </ul>	<ul> <li>There is general discussion of the safety information given to supervisors</li> <li>Serious incidents are usually reviewed</li> </ul>	
lessons learned     review of serious incidents			

#### C5. NEW HIRE SAFETY ORIENTATION

6	4	2	0
<ul> <li>6</li> <li>A documented safety orientation process is in place for all newly hired or transferred employees (i.e. who gets orientation, when, how, by whom and topics to be covered)</li> <li>Safety orientation topics include, but are not limited to: <ul> <li>Explanation of employer safety commitment and expectations</li> <li>Individual safety responsibilities and accountability</li> <li>PPE expectations with skills demonstration (wearing harness, adjusting guards, PPE use, etc.)</li> <li>Basic and advanced safety rules that pertain to site and/or major job hazard exposures</li> <li>Hazard communication</li> <li>Hazard, injury and emergency reporting procedures</li> </ul> </li> </ul>	4 • Safety orientation is given to new employees; however, the process has not been formalized • Safety orientation topics include at a minimum: • Explanation of employer safety commitment and expectations • Review of substance policy • PPE expectations • Basic safety rules that pertain to site and/or major job hazard exposures • Hazard communication • Hazard, injury and emergency reporting procedures • Process may or may not involve a special designation (decal, hard hat) or safety mentor	2 • Informal or on-the-job safety instruction is given to new hires • There is no uniform process or list of topics to cover • No documentation is maintained	O • No orientation is given to new employees
<ul> <li>Review of substance abuse policy</li> <li>Identity of key competent persons and their specific roles</li> <li>Orientation platforms include instructor-led, video published training and other written materials</li> <li>New hires are assigned a special designation (decal, hard hat color) or safety mentor until their orientation process is complete</li> <li>New hire performance evaluation process is established to give feedback to new hires on pre-</li> </ul>	<ul> <li>There is no new hire performance evaluation process</li> <li>Record of safety orientation, with employee signature, is maintained</li> </ul>		
<ul> <li>determined frequency (30 days and 60 days)</li> <li>Documented records are maintained showing initial/promotion employee safety orientations have occurred</li> </ul>			

\*See Definitions

#### C6. EMPLOYEE SAFETY TRAINING

12	8	4	0
<ul> <li>Based on an annual safety training needs assessment, a database is developed and instituted (i.e., who needs what, when and who will train)</li> <li>Formal safety training topics include, but are not limited to: <ul> <li>Recognition and control of hazards specific to trade/work tasks (e.g., heavy equipment, lift operation, LOTO and arc flash, rigging, crane operation, confined space entry, temp traffic control, hot work, excavation safety, steel erection, blasting safety, noise, lead, asbestos, mold exposure, etc.)</li> <li>First Aid/CPR/AED</li> <li>OSHA topics (e.g., PPE, hazcom, electrical, scaffold, ladder/stairs, fire prevention and</li> </ul> </li> </ul>	<ul> <li>8</li> <li>Safety training needs are determined each year, but a formal assessment and database are not used</li> <li>Formal safety training topics include: <ul> <li>Recognition and control of hazards specific to trade/work tasks (e.g., heavy equipment, lift operation, LOTO and arc flash, rigging, crane operation, confined space entry, temp traffic control, hot work, excavation safety, steel erection, blasting safety, noise, lead, asbestos, mold exposure, etc.)</li> </ul></li></ul>	<ul> <li>4</li> <li>Informal or on-the-job safety training is arranged as needed</li> <li>There is no established training matrix or database</li> <li>Limited or no training documentation is kept</li> <li>Companies executives exempt from training classes.</li> </ul>	0 • No formal safety training is provided
- OSHA topics (e.g., PPE, hazcom, electrical,	steel erection, blasting safety, noise, lead, asbestos, mold		
<ul> <li>Employee training comprehension and understanding is verified and documented (e.g., test, skills assessment, etc.)</li> <li>Records are kept of all training – date, attendees, topics covered and trainer</li> </ul>	<ul> <li>Companies identify training by role/positions but may not have discipline to follow up or ensure employees understand the need.</li> </ul>		

#### C7. BEHAVIOR-BASED SAFETY (BBS)\*

6	4	2	0
<ul> <li>BBS process is written and the entire company, including top management, has been formally trained in the process of conducting an observation</li> <li>BBS observations are conducted at least daily</li> <li>Data is analyzed weekly and trends are communicated throughout the organization</li> <li>The process allows employees to submit observations anonymously</li> <li>Top management participates in the process, conducting at least one observation per month</li> <li>Site management reviews data weekly and modifies work practices to reduce trends</li> <li>BBS data is shared with site personnel weekly</li> </ul>	<ul> <li>BBS process is written, and the all employees have been trained in the process of conducting an observation</li> <li>BBS observations are conducted, collected and analyzed monthly</li> <li>The process allows employees to submit observations anonymously</li> <li>Top management reviews the data monthly, but may or may not conduct an observation</li> <li>Site management reviews data monthly and modifies work practices to reduce trends</li> <li>BBS data is shared with site</li> </ul>	<ul> <li>An observation process is in place but is not a formal policy or procedure</li> <li>BBS observations are conducted at least monthly</li> <li>Participation by employees is encouraged</li> <li>Site management reviews data bi-monthly</li> <li>BBS data is shared with site personnel monthly</li> </ul>	• No BBS process is in place
	personnel biweekly		

\*See Definitions

#### **C8. SUPERVISOR SAFETY TRAINING**

9	6	3	0
All supervisory personnel receive training in:     Company safety policy	• All Supervisory personnel receive training in:	<ul> <li>Supervisory personnel receive safety training in:</li> </ul>	<ul> <li>There is no specific training program for supervisory</li> </ul>
- Employer's supervisor safety expectations	- Company safety policy - Company safety policy	personnel	
- First Aid/CPR/AED	<ul> <li>Employer's supervisor safety expectations</li> </ul>	<ul> <li>Employer's supervisor safety expectations</li> </ul>	
- OSHA 30	- First Aid/CPR/AED	- First Aid/CPR/AED	
<ul> <li>Competent person for trade/task-specific topics</li> </ul>	- OSHA 10	- OSHA 10	
- Emergency response procedures	<ul> <li>Competent person for trade/ task-specific topics</li> </ul>	<ul> <li>Competent person for trade/ task-specific topics</li> </ul>	
- Completing an incident investigation	- Emergency response	- Emergency response	
- Conducting a jobsite safety inspection or	procedures	- Completing an incident	
BBS observation	- Completing an incident	investigation	
- Creating a job safety analysis	investigation	- Conducting a jobsite safety	
- Key points in Leadership and Human Resources	<ul> <li>Conducting a jobsite safety inspection or BBS observation</li> </ul>	inspection or BBS observation	
- Conducting effective meetings	- Competent/qualified trainers		
• Opportunities for professional development are	are used		
offered and employees participate in annual refresher safety training	<ul> <li>Supervisors have access to sources of safety information or</li> </ul>		
Supervisors have access to a safety subject	knowledge		
matter expert (SME)	Annual refresher training is		
• Dedicated training facilities are available with competent/qualified trainers	available, but not mandatory		

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## PROCESS

#### P1. INCIDENT INVESTIGATION

9	6	3	0
• Employer reviews all incidents including good catches and potential significant events (PSE).	• Supervisors receive a basic level of incident investigation training	<ul> <li>Supervisors receive little or no incident investigation training</li> </ul>	• Incidents are not investigated to determine causal factors
<ul> <li>Supervisors are trained in the techniques of incident investigation including, but not limited to, root cause*, casual factors and/or fault tree analysis, among many others</li> <li>Incidents are investigated promptly by top management</li> <li>and safety department personnel and a preliminary report is communicated within 24-48 hours</li> <li>Reports are completed for all incidents</li> <li>Documented corrective actions taken</li> <li>Final incident outcomes are openly shared across the organization to improve overall safety performance</li> </ul>	<ul> <li>Incidents, good catches and potential significant events are investigated by site supervision</li> <li>Reports are completed for all incidents</li> <li>Remedial actions are taken to prevent recurrence of similar incidents</li> <li>Employer reviews only serious incidents</li> <li>Final notification of incidents is communicated to all stakeholders</li> </ul>	<ul> <li>Incidents are usually investigated by site supervision, but may be</li> <li>investigated by someone else</li> <li>Reports are not always completed and communicated in a timely manner</li> <li>Little or no attempt is made to identify causal factors or take corrective actions</li> <li>Lessons learned are not shared openly across the organization</li> </ul>	

#### P2. PRE-PLANNING FOR PROJECT SAFETY\*

6	4	3	0
<ul> <li>Project supervision and other key personnel are trained in pre-planning for project safety</li> <li>Safety pre-planning is integrated into the estimate, bid and mobilization/ demobilization stages of projects</li> <li>A checklist or similar document is used to ensure a consistent and comprehensive approach to exposure evaluation and resource needs</li> <li>Project safety plans are regularly updated throughout life of project</li> <li>Key components of the pre-plan (including updates) are communicated with all site employees (including specialty contractors, if applicable) before implementation</li> </ul>	<ul> <li>Project supervisory personnel may have received some training in the safety pre-planning process, but it is not required</li> <li>Safety pre-planning is required prior to start of site work</li> <li>A checklist or similar document serves as a guide through the process</li> <li>Safety resources are provided as needed</li> </ul>	<ul> <li>There is no established procedure for project safety</li> <li>pre-planning, but some planning is done</li> <li>No checklist or other document is used as a guide</li> <li>Safety resources are often provided only after problems or needs have been encountered</li> </ul>	• No safety pre-planning is done

#### P3. EMERGENCY RESPONSE/FIRE ELIMINATION PLAN

6	4	2	0
• Company has a comprehensive fire elimination plan (FEP) that includes the following, at a minimum:	• Company has fire elimination plan (FEP) that includes the	• Company has fire elimination plan (FEP) that includes the	No Emergency Response/FEP     exists
<ul> <li>If general contractor, all tiered contractors are contractually bound to follow the FEP</li> </ul>	following, at a minimum: - Training on the selection, use	following, at a minimum: - Annual toolbox topic and	
- Training on the selection, use and maintenance of portable fire extinguishers	and maintenance of portable fire extinguishers	demonstration of how to use a fire extinguisher	
- Hot work recognition, training and permitting to include a 30-minute fire watch	<ul> <li>Hot work recognition, training and permitting to include a 30-minute fire watch</li> </ul>	<ul> <li>Informally communicated, but not documented, evacuation and head count procedures</li> </ul>	
<ul> <li>Only approved flammable and combustible containers are used or allowed onsite</li> </ul>	<ul> <li>Evacuation, assembly point and head count procedures</li> </ul>		
<ul> <li>Frequent and consistent disposal of combustible material (housekeeping)</li> </ul>	are published, posted and communicated		
<ul> <li>Evacuation, assembly point and head count procedures are published, posted and communicated</li> </ul>	<ul> <li>Compressed gas is handled, stored and used per manufacturer's</li> </ul>		
<ul> <li>Compressed gas is handled, stored and used per manufacturer's recommendations</li> </ul>	recommendations <ul> <li>Evacuation procedures are</li> </ul>		
- Evacuation procedures and assembly points are established	established, but not consistently communicated		

#### P4. TASK-SPECIFIC SAFETY PROCESS\*

6	4	2	0
<ul> <li>A task-specific safety process has been established and is consistently used across the company</li> </ul>	• A process exists and is utilized on site	• A policy exists but is not consistently utilized on site	• No task-specific plan exists
<ul> <li>The process is reviewed annually by top management</li> <li>All personnel are trained in using the process</li> <li>Each task is reviewed separately, and the process is complete when outcomes are explained to the employees and employees confirm understanding of the work hazards and mitigation process.</li> <li>Change of conditions require work to be stopped, the process is reviewed and altered to complete the work safely</li> </ul>	<ul> <li>Supervisory personnel have received training on completing the task-specific planning process</li> <li>The plan is completed prior to the start of onsite operations</li> <li>When conditions change the plan is reviewed for corrections</li> <li>Employees have read, understood and signed off on the plan</li> </ul>	<ul> <li>A plan exists but is only completed for high- hazard/risk operations</li> <li>Forms are not reviewed after the work is completed</li> </ul>	
• Policy includes, at a minimum, the following;			
- definition of scope of work			
- hazard analysis and control methods			
- continuous improvement provisions			

#### P5. SAFETY RULES

9	6	3	0
<ul> <li>Safety rules are:</li> <li>In writing and are part of the employee safety policy</li> <li>Explained to employees at time of new hire orientation</li> <li>Clear, concise and easy to understand</li> <li>Specific to trade and/or scope of work operations</li> <li>Enforced equally among all employees</li> <li>Regularly updated to reflect change in company policy and/or regulation</li> <li>Specialty contractors are contractually bound to the general contractor's safety program</li> </ul>	<ul> <li>Safety rules are: <ul> <li>In writing and posted, but not necessarily in the employee safety policy</li> <li>Explained to employees at one time or another</li> <li>Specific to trade and/or scope of work operations</li> <li>Usually enforced equally among all employees</li> <li>Periodically updated to reflect change in company policy and/ or regulation</li> <li>If the company is a general contractor (GC), specialty contractors are encouraged to comply with their safety rules</li> </ul> </li></ul>	<ul> <li>Some general safety rules exist, but they are not posted or reviewed with employees</li> <li>Rules that do exist are boilerplate rules and are not necessarily specific to the company's trade and/or scope of operations</li> <li>Safety rules are not regularly enforced</li> <li>Safety rules are rarely reviewed or updated</li> <li>Specialty contractors are not required to follow the GC's safety rules</li> </ul>	• There are no safety rules

#### P6. TOOLBOX SAFETY TALKS

6	4	2	0
<ul> <li>Toolbox talks are held daily</li> <li>Employees routinely lead the talks</li> <li>The highest-level supervisors onsite are present and participate in the talks</li> <li>Top management occasionally attends and participates</li> <li>Attendance and topics are documented</li> </ul>	<ul> <li>Toolbox talks are held regularly— at least weekly</li> <li>Attendance and topics are documented</li> <li>Supervisors actively solicit employee participation (e.g., volunteer to present talk, share experience, Q&amp;A, etc.)</li> <li>The highest-level supervisors are present and participate</li> <li>Top management occasionally attends</li> </ul>	<ul> <li>Attendance and topics are documented</li> <li>Employees are encouraged to participate</li> </ul>	<ul> <li>Toolbox talks are not held or held only occasionally (less than once per month)</li> </ul>

#### P7. SAFETY INSPECTIONS

9	6	3	0
<ul> <li>Monthly jobsite safety inspections are conducted by project manager(s)</li> <li>Weekly jobsite safety inspections are conducted by the site superintendent(s)</li> <li>Daily jobsite safety inspections are conducted by the site foremen</li> <li>Inspection is documented, along with assignment of responsibility and expected completion date</li> <li>Potentially serious safety issues are corrected immediately</li> <li>Less serious safety issues are corrected promptly</li> <li>Follow-up process to confirm action taken and that it is producing expected results</li> </ul>	<ul> <li>Quarterly jobsite safety inspections are conducted by project manager(s)</li> <li>Monthly jobsite inspections are conducted by the site superintendent(s)</li> <li>Inspection is documented, along with assignment of responsibility and expected completion date</li> <li>Potentially serious safety issues are corrected immediately</li> <li>Less serious safety issues are corrected promptly</li> </ul>	<ul> <li>Informal jobsite inspections (walk-through) are made by the site superintendent</li> <li>There is no documentation or follow-up</li> <li>Safety issues are corrected, in a timely, unspecified manner</li> </ul>	• No inspections are conducted

#### P8. USE OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

9	6	3	0
<ul> <li>Company has a written PPE policy</li> <li>Company conducts an annual PPE needs assessment that is documented</li> <li>Company continually invests in new and updated PPE, as needed</li> <li>Processes are instituted by which the suitability and effectiveness of PPE is evaluated by field personnel</li> <li>Employees are informed of PPE requirements for each job</li> <li>Employees are trained, prior to use, in PPE selection, inspection, use and care</li> <li>PPE refresher training is conducted at least annually</li> <li>Company PPE policy is consistently and universally enforced</li> </ul>	<ul> <li>The company has a written PPE policy</li> <li>Employees are informed of PPE requirements for each job</li> <li>Employees are trained in PPE selection, inspection, use and care</li> <li>Company PPE policy is consistently and universally enforced</li> </ul>	<ul> <li>A PPE policy exists, but is rarely enforced without pressure from controlling contractors or owners</li> <li>PPE is provided, and its use encouraged</li> <li>Some training on PPE use is provided</li> <li>Company PPE policy is enforced inconsistently</li> </ul>	• No PPE policy exists and use of PPE is left to the discretion of each employee

#### P9. RECORDKEEPING AND DOCUMENTATION

6	4	2	0
<ul> <li>The company maintains accurate and current records and documents for:</li> </ul>	• The company maintains records and documents for:	<ul> <li>The company maintains minimal records, which may or may not be up to date:</li> <li>OSHA injury and illness records (reports, 300 logs and 300A summary log)</li> <li>Basic safety policy</li> </ul>	<ul> <li>No records are kept for safety- related activities or policies</li> </ul>
<ul> <li>OSHA injury and illness records (reports, 300 logs and 300A summary log</li> <li>Safety training, including verification of learning (test, skills evaluation, etc.)</li> <li>OSHA-required written programs</li> <li>Employee safety policy</li> <li>Incident investigations</li> <li>Equipment inspections are documented</li> <li>Site inspections/surveys, including verification of action taken</li> </ul>	<ul> <li>OSHA injury and illness records (reports, 300 logs and 300A summary log)</li> <li>Safety training</li> <li>OSHA-required written programs</li> <li>Employee safety policy</li> <li>Incident investigations and near fatality/good catches</li> <li>Safety inspections/surveys</li> </ul>		
<ul> <li>Safety orientations</li> <li>Safety pre-planning</li> <li>Loss run analysis</li> <li>Employee exposure and monitoring data and reports</li> <li>Safety committee meeting minutes</li> </ul>	- Equipment, including mobile equipment		

#### P10. WORK ZONE/MOBILE EQUIPMENT/VEHICLE SAFETY

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- A written traffic control plan, per the FHWA MUTCD is completed, reviewed, and implemented for all projects, as required. (Answer only if you are responsible for traffic control).
- Whether self-performed or contracted, the company ensures employees are trained and certified for flagging operations.
- The company has a formal distracted and defensive driving policy in place that applies 100% to all employees while driving vehicles and mobile equipment and disciplinary action for any violation of said policy.
- The company has a formal process in place to train and certify company vehicle and mobile equipment operators which include a performance verification and documents those records in personnel files.
- The company has a formal "spotter" program for aiding and directing vehicles or heavy equipment when backing and/or working near other personnel.
- Equipment inspections are conducted and documented per OSHA/manufacturers recommendations

 The company has a distracted driving policy in place that addresses no texting while driving company vehicles.

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- The company verifies equipment operator's experience at the time of hire but does not have a formal performance verification process in place.
- The hazards associated with vehicle backing is covered during annual training but and includes a performance evaluation (hand-on practical) but it is not documented in the personnel files.
- Formal traffic control plans and/or requirements per the FHWA MUTCD are implemented in some, but not every project. (Answer only if you are responsible for traffic control).

 Flagging personnel are utilized to control traffic, but there is no formal requirement to ensure they are certified.

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- The company does not verify equipment operators experience.
- The hazards associated with vehicle backing is only addressed during the review of a daily work if applicable to the scope of work for the day.
- The company does not have a formal distracted driving policy in place but does encourage employees not to text and drive.

• The Company lacks a defensive driving or phone use policy.

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- Vehicle backing risks is not currently addressed by the company.
- Vehicle and mobile equipment inspections are not conducted.
- Planning for work zone traffic control and/or flagging operations is not conducted.

## RESULTS

#### **R1. LEADING INDICATORS**

6	4	2	0
<ul> <li>Top management reviews leading indicator data monthly</li> </ul>	<ul> <li>Leading indicators are defined; are not post-injury related</li> </ul>	• Leading indicator data is collected monthly	No process in place to track     leading indicators
<ul> <li>Leading Indicators are defined; are not post injury related</li> <li>Leading indicator data is collected daily and inputted into a format (e.g., spreadsheet, safety app) for analysis</li> <li>Site management reviews leading indicator data weekly</li> <li>Leading indicator data is analyzed for trends against previous week(s)</li> <li>Construction site management reviews leading indicator data weekly and adjust work practices accordingly</li> <li>Company has identified a minimum of four leading indicators</li> </ul>	<ul> <li>Leading indicator data is collected weekly and inputted into a format (e.g., spreadsheet, safety app) for analysis</li> <li>Site management reviews leading indicator data monthly</li> <li>Company has identified a minimum of two leading indicators that are not injury related</li> </ul>	• Company has identified a leading indicator that is not injury related	

#### R2. TRAILING INDICATORS (REVIEW OF CLAIMS AND KEY SAFETY RATES)

6	4	2	0
<ul> <li>Key company personnel are trained to know the meaning and relevance of key safety performance indicators (KSPI) e.g., EMR, TRIR, DART</li> <li>EMR of the current and previous year is below</li> <li>0.80 (0.90 for companies with fewer than 100 employees)</li> <li>Employer regularly reviews claims, claim costs and claim trends to gauge impact on company and guide resource allocation</li> </ul>	<ul> <li>Key company personnel are familiar with KSPI's, but may not fully understand meaning or relevance</li> <li>EMR of the current and previous year is below 0.90 (1.0 for companies with fewer than 100 employees)</li> <li>Employer reviews claims with insurer as part of workers' comp policy renewal process</li> </ul>	<ul> <li>Key company personnel are not familiar with KSPI's</li> <li>EMR for current year is at or below 1.0, or;</li> <li>Is at least 1.0 in one of the previous two years, or</li> <li>Has decreased two of previous three years</li> </ul>	• KSPI are unknown