

**Leadership
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2022 **STEP** INSTRUCTIONS



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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 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, Gold, Platinum, or Diamond recognition levels if you submit your application online at abc.org/stepapp.

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 2022 National Safety Excellence Award must have participated in STEP at the Gold, Platinum or Diamond level in 2022.

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 Aaron Braun, Manager of Safety Programs and Initiatives at (202) 595-1855 or braun@abc.org.

2022 STEP QUALIFICATION CRITERIA

Participant Level

- a) Recognizes those who participate in STEP, but do not achieve the minimum Key Components self-score¹ required for Bronze-level recognition.
- b) Must submit 2021 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 Key Components self-score¹ required.
- b) Must submit 2021 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 Key Components self-score¹ required.
- b) Must submit 2021 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).⁵

Gold Level

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

- a) Minimum Gold Level Key Components self-score¹ required.
- b) Incidence rate² equal to or below the national BLS³ average for applicant's NAICS⁴ 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 2021 OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for data verification purposes.⁵
- 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 Key Components self-score¹ required.
- b) Incidence rate² at least 25 percent below the national BLS³ average for applicant's NAICS⁴ code in the application year.⁵
- 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) 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.
- f) Submit the 2021 OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for data verification purposes.⁵

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 rate² at least 50 percent below the national BLS³ average for applicant's NAICS⁴ code in the current application year and each of the past two consecutive application years.⁵
- b) Submit the OSHA Form 300A ("Summary of Work-Related Injuries and Illnesses") with the application for years 2018, 2019, 2020 and 2021 for data verification purposes.⁵

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

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 Key Components Self-Score – ABC does not publish minimum qualification scores for the 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 = $N \times 200,000 / \text{Total hours worked by all employees in calendar year}$

"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 in supporting attachment titled 'NAICS Codes' on the STEP application homepage.

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 2018, 2019, 2020 and 2021 OSHA Form 300A. For applicants under 50 employees who are submitting based on their five-year incidence rate average, you must submit your 2016, 2017, 2018, 2019, 2020 and 2021 OSHA Form 300A.

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2022 STEP APPLICATION



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Pre-Application

Company Name*

Contact Name*

Contact Email*

Have you signed the Drug and Alcohol-Free Workplace pledge?

Yes No

Are you a part of ABC's Accredited Quality Contractor (AQC) Program?

Yes No

Are you a contractor or supplier?*

Contractor

- 236110 - Residential Building Construction
- 236115 - New Single-Family Housing Construction (except For-Sale Builders)
- 236117 - New Housing For-Sale Builders
- 236118 - Residential Remodelers
- 236210 - Industrial Building Construction
- 236220 - Commercial and Institutional Building Construction
- 237110 - Water and Sewer Line and Related Structures Construction
- 237120 - Oil and Gas Pipeline and Related Structures Construction
- 237130 - Power and Communication Line and Related Structures Construction
- 237210 - Land Subdivision
- 237310 - Highway, Street, and Bridge Construction
- 237990 - Other Heavy and Civil Engineering Construction
- 238110 - Poured Concrete Foundation and Structure Contractors
- 238120 - Structural Steel and Precast Concrete Contractors
- 238130 - Framing Contractors
- 238140 - Masonry Contractors
- 238150 - Glass and Glazing Contractors
- 238160 - Roofing Contractors
- 238170 - Siding Contractors
- 238190 - Other Foundation, Structure, and Building Exterior Contractors
- 238210 - Electrical Contractors and Other Wiring Installation Contractors
- 238220 - Plumbing, Heating, and Air-Conditioning Contractors
- 238290 - Other Building Equipment Contractors
- 238310 - Drywall and Insulation Contractors
- 238320 - Painting and Wall Covering Contractors
- 238330 - Flooring Contractors
- 238340 - Tile and Terrazzo Contractors
- 238350 - Finish Carpentry Contractors
- 238390 - Other Building Finishing Contractors
- 238910 - Site Preparation Contractors
- 238990 - All Other Specialty Trade Contractors

Supplier

- 327320 - Ready-Mix Concrete Manufacturing
- 327390 - Other Concrete Product Manufacturing
- 423310 - Lumber, Plywood, Millwork, and Wood Panel Merchant Wholesalers
- 423320 - Brick, Stone, and Related Construction Material Merchant Wholesalers
- 423390 - Other Construction Material Merchant Wholesalers
- 423510 - Metal Service Centers and Other Metal Merchant Wholesalers
- 424720 - Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)
- 541380 - Testing Laboratories
- All Other Supplier Codes - All Other Supplier Codes



Company Information

This application and data:*

Represents entire company Represents location, dept., or div.

Annual Volume (work in place) \$:

Please indicate the organizations your company uses for insurance brokerage, carrier or surety.*

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

Please specify the percentages for each of the following types:

Keep in mind all percentage totals must equal 100%

Work Type		Proximity to Headquarters		Percentage of Work	
Residential	%	Within 100 miles	%	Self-Performed	%
Commercial	%	Within 101-250 miles	%	Subcontracted	%
Industrial	%	Beyond 250 miles	%		
Public Works/Military	%				



2021 Safety Performance Data Please

enter the numbers from your company's 2021 OSHA 300A.

A. Total number of DEATHS:

B. Total number of CASES with days away from work:

C. Total number of CASES with job transfer/restriction:

D. Total number of OTHER RECORDABLE CASES:

E. Total number of DAYS away from work:

F. Total number of DAYS of job transfer or restriction:

G. Annual average number of employees:

H. Total hours worked by all employees:

**Number of federal/state OSHA citation issued
(affirmed after settlement) in 2021:**

Willful Citations:

Repeat Citations:

Serious Citations:

Other than Serious:



Incident Rate:	EMR as of January 1, 2022:*
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For calendar year 2019, 2020 or 2021, have you had any employee fatalities corporate-wide that resulted in an OSHA citation?*

Yes No

Do you track good catches/potential significant events? (aka near misses/near hits)

Yes No

If yes, how many did you record in 2021?

Do the numbers in letters A-H above match the uploaded 2021 OSHA 300A?*

Yes No

If no, explain.

Safety Training Data

Length of safety portion of new-hire orientation (in minutes):

Toolbox Safety meeting frequency:

Daily Weekly Bi-Weekly Monthly Other

Do you conduct site-specific safety orientations for all employees, including specialty (sub) contractors?

Yes No

Do you establish/participate in site safety committees at most jobsites?

Yes No

Do you conduct safety training for employees beyond owner/user-required training?

Yes No

Do you conduct a daily task specific safety process, aka a Jobsite Safety Analyses (JSA) / Activity Hazard Analyses (AHA)?

Yes No

25 Key Components

Please select the number representing each category question that corresponds to you.

25 Key Components Worksheet

Leadership Commitment

L1. Top Management Engagement	12	8	4	0
L2. Safety Policy Statement	6	4	2	0
L3. Safety Responsibilities	9	6	3	0
L4. Resources for Safety	6	4	2	0
L5. Safety Program Performance Review	6	4	2	0

Culture

C1. Employee Participation	9	6	3	0
C2. Substance Abuse Program	6	4	2	0
C3. Safety Program Goal Setting	9	6	3	0
C4. Supervisor Safety Meetings	9	6	3	0
C5. New Hire Safety Orientation	6	4	2	0
C6. Employee Safety Training	12	8	4	0
C7. Behavior-Based Safety (BBS)	6	4	2	0
C8. Supervisor Safety Training	9	6	3	0

Process

P1. Incident Investigations	9	6	3	0
P2. Pre-planning Project Safety	6	4	2	0
P3. Emergency Response/Fire Elimination Plan	6	4	2	0
P4. Task-Specific Safety Process	6	4	2	0
P5. Safety Rules	9	6	3	0
P6. Toolbox Safety Talks	6	4	2	0
P7. Safety Inspections	9	6	3	0
P8. Use of Personal Protective Equipment (PPE)	9	6	3	0
P9. Recordkeeping and Documentation	6	4	2	0
P10. Work Zone/Mobile Equipment/Vehicle Safety	6	4	2	0

Results

R1. Leading Indicators	6	4	2	0
R2. Trailing indicators (review of claims and key safety rates)	6	4	2	0

I have read and understand all qualifying requirements and instructions as outlined in the STEP Instruction Book.

Total Score



Company Executive Name*

Company Executive Email*

Company Executive Title*

Date

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2022 **STEP** CONTRACTOR **KEY COMPONENTS**



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CONTRACTOR KEY COMPONENTS OF SAFETY SELF-ASSESSMENT WORKSHEET

The Contractor 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 Contractor Key Components will automatically be rounded down to the nearest listed score.

LEADERSHIP

L1. TOP MANAGEMENT ENGAGEMENT

12	8	4	0
<ul style="list-style-type: none"> • Owner/CEO/top management leadership directly and actively participates in the safety process • Top management instills personal accountability for safety throughout the company • Top management tracks and biannually reviews safety goals/objectives for the company • Top management solicits continuous feedback on the safety process • Top management commits resources (money, time, personnel, equipment, supplies, etc.) for the safety process necessary to achieve goals • Safety performance is assessed in everyone's performance appraisal (executive and field employees) • Top management integrates safety into every facet of company operation 	<ul style="list-style-type: none"> • Top management participates in the safety process • Personal accountability for safety is expected, but there is little or no recourse if not demonstrated • Top management is aware of safety process goals/ objectives, but does not track progress • Top management provides the resources necessary for safety compliance 	<ul style="list-style-type: none"> • Top management supports safety, but does not actively participate • There is little personal accountability for safety – a “just be careful” culture exists • Limited funds are provided for safety 	<ul style="list-style-type: none"> • Top management is not involved in the safety process and demonstrates little interest in it • Safety is left to supervisory personnel to handle “as needed” • There is no accountability for safety • Little or no funding is provided for safety

L2. SAFETY POLICY STATEMENT

6	4	2	0
<ul style="list-style-type: none"> • Is in writing and is signed and by top management • Is explained to employees at time of new hire orientation • Explains the value of safety in the company • Commits to protecting employees, continually improving the program, involving employees in the safety process and meeting regulatory obligations • States universal accountability for safety in the company • Is posted or part of employee safety policy 	<ul style="list-style-type: none"> • Policy exists and is in writing • Policy is not explained to employees, but most know of its existence • Explains employer's general commitment to a safe workplace • Is posted, is part of the employee safety policy or is in the company safety manual 	<ul style="list-style-type: none"> • Policy exists, but is not posted nor in safety manual • Not explained to employees and most do not know 	<ul style="list-style-type: none"> • No policy exists

L3. SAFETY RESPONSIBILITIES

9	6	3	0
<ul style="list-style-type: none"> Responsibilities for safety are clearly defined for everyone in the company, including 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. Supervisory personnel have additional responsibilities that are reviewed with them at time of hire or promotion A policy to hold everyone accountable (including specialty contractors) for safety is in place and is universally applied. 	<ul style="list-style-type: none"> Responsibility for safety is defined for everyone in company Accountability for safety is not always universally applied Explained to employees at time of new hire orientation Is in writing and is part of employee safety policy 	<ul style="list-style-type: none"> Responsibility for safety rests solely with a designated safety coordinator or safety committee Responsibilities are not in writing All employees know is that they are responsible for "being safe" There is little or no accountability for safety 	<ul style="list-style-type: none"> Responsibility for safety has not been defined within the company

L4. RESOURCES FOR SAFETY

6	4	2	0
<ul style="list-style-type: none"> All safety resources (funds, time, personnel, equipment, supplies, etc.) are regularly budgeted or invested. Return on safety investment is tracked (actual or projected) to evaluate effectiveness of resource allocation and to guide future expenditure decisions Resource funding and expectations are explained to supervisory personnel upon hire or promotion 	<ul style="list-style-type: none"> Reasonable resources are budgeted or invested in safety Supervisory personnel are generally aware of company resources available 	<ul style="list-style-type: none"> Minimal investments are made in safety Money is taken from general funds as needed to react to safety needs (GC mandates, OSHA fines, incidents, etc.) 	<ul style="list-style-type: none"> Resources are not made available for safety

L5. SAFETY PROGRAM PERFORMANCE REVIEW

6	4	2	0
<ul style="list-style-type: none"> Top management reviews the safety program performance biannually The emphasis of the review is on whether the program is producing expected results and where opportunities for improvement exist Defined criteria exist against which performance is measured (e.g., safety surveys conducted, trainings held, incidence rates, loss ratios, progress toward annual goals, safety meetings, OSHA inspection record, prevention of recurring incidents/ hazards, employee participation, etc.) Results are documented Results impact safety staff and supervisor annual performance evaluations Following each review, meetings are conducted with safety staff and supervisory personnel to discuss results and expectations 	<ul style="list-style-type: none"> Top management reviews the safety program annually Some criteria exist against which performance is measured Process is not documented Results do not significantly affect safety staff and/or supervisor evaluations Results are eventually discussed with safety staff and/or supervisory personnel 	<ul style="list-style-type: none"> Regular (pre-determined frequency) reviews of safety program performance does not occur Limited top management involvement—mainly left to someone else (safety administrator, insurance company, etc.) Subjective review of safety activities – mainly serves as a "year in review" and not an assessment of performance and improvement opportunity Results may or may not be reviewed with supervisory personnel 	<ul style="list-style-type: none"> No review of safety program performance is performed

CULTURE

C1. EMPLOYEE PARTICIPATION

9	6	3	0
<ul style="list-style-type: none"> • 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.) • Supervisory personnel are aware of these opportunities and actively encourage employee involvement • 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 	<ul style="list-style-type: none"> • Opportunities for employees to participate in safety process exist, but are not specifically documented • Supervisors are provided limited training in soliciting employee participation, but nonetheless encourage involvement • Employees may be aware of opportunities, but there are no specific participation expectations • There is a limited focus on identifying and eliminating potential barriers to participation 	<ul style="list-style-type: none"> • Employees are encouraged to participate in the safety process, but no concerted efforts are made to engage them • Employees are offered a general communication channel: "If you have any questions or concerns, speak with your foreman." • An employee suggestion/comment process is in place 	<ul style="list-style-type: none"> • There are no opportunities for employees to participate in the safety process

C2. SUBSTANCE ABUSE PROGRAM

6	4	2	0
<ul style="list-style-type: none"> • The company's safety policy explains its substance abuse program • The policy includes random, pre-employment and reasonable suspicion substance abuse testing • The policy is consistent and actively enforced • Supervisory personnel are trained in workplace substance abuse recognition • Employee substance abuse prevention education initiatives are offered • The company has an employee assistance program (EAP) • The company keeps counseling and testing records • Specialty contractors are contractually required to have programs equal to or exceeding the general contractors 	<ul style="list-style-type: none"> • The company has substance abuse verbiage in the employee safety policy • Substance abuse testing is for pre-employment only • The company makes a minimal effort to enforce policy • Supervisors are trained in hazards of substance abuse on the job • Specialty contractors are contractually required to conduct pre employment testing 	<ul style="list-style-type: none"> • The company has substance abuse verbiage in its safety manual • Drug/alcohol testing is inconsistent • Company makes no or little effort to enforce the policy • Subcontract language does not include compliance 	<ul style="list-style-type: none"> • The company has no policy regarding substance abuse testing

C3. SAFETY PROGRAM GOAL SETTING

9	6	3	0
<ul style="list-style-type: none"> • A formal process is in place to annually assess or establish safety program goals • Action plans are developed, documented and implemented to assure goals are accomplished in a timely manner • Progression of action plans are tracked, with status reports and feedback from those assigned the tasks • Top management reviews goals, action plans and status reports with staff to provide feedback, direction and support of initiatives • Process is in place to evaluate degree of effectiveness action plan had in achieving end goal 	<ul style="list-style-type: none"> • Safety program goals are established periodically • A plan to achieve goals has been decided, but not documented • Status of action plan is informally checked, but with no set frequency and with little follow-up or solicitation of feedback • Top management plays minor part in safety goal-setting process • No process is in place to gauge the effectiveness of the action plan in achieving end goal 	<ul style="list-style-type: none"> • Informal or infrequent safety program goals are established • There is little or no documentation or employee knowledge of goals • No realistic action plans are developed to accomplish goals • Top management is not involved • Goals seldom tracked, reviewed or achieved 	<ul style="list-style-type: none"> • There is no process of safety program goal-setting

C4. SUPERVISOR SAFETY MEETINGS*

9	6	3	0
<ul style="list-style-type: none"> • The employer conducts weekly supervisor safety meetings • The employer begins each meeting with a safety moment • Meetings include: <ul style="list-style-type: none"> - A dedicated safety training topic, rotated weekly - pre-planning discussions - lessons learned - review of serious incidents 	<ul style="list-style-type: none"> • At least monthly, the employer conducts supervisor safety meetings • Meeting includes a status report on site safety activities • Serious incidents are reviewed 	<ul style="list-style-type: none"> • Supervisor safety meetings are held occasionally (less than monthly) • There is general discussion of the safety information given to supervisors • Serious incidents are usually reviewed 	<ul style="list-style-type: none"> • The employer does not conduct supervisor safety meetings

C5. NEW HIRE SAFETY ORIENTATION

6	4	2	0
<ul style="list-style-type: none"> • 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) • Safety orientation topics include, but are not limited to: <ul style="list-style-type: none"> - Explanation of employer safety commitment and expectations - Individual safety responsibilities and accountability - PPE expectations with skills demonstration (wearing harness, adjusting guards, PPE use, etc.) - Basic and advanced safety rules that pertain to site and/or major job hazard exposures - Hazard communication - Hazard, injury and emergency reporting procedures - Review of substance abuse policy - Identity of key competent persons and their specific roles - Orientation platforms include instructor-led, video published training and other written materials • New hires are assigned a special designation (decal, hard hat color) or safety mentor until their orientation process is complete • New hire performance evaluation process is established to give feedback to new hires on pre-determined frequency (30 days and 60 days) • Documented records are maintained showing initial/promotion employee safety orientations have occurred 	<ul style="list-style-type: none"> • Safety orientation is given to new employees; however, the process has not been formalized • Safety orientation topics include at a minimum: <ul style="list-style-type: none"> - 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 • There is no new hire performance evaluation process • Record of safety orientation, with employee signature, is maintained 	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • No orientation is given to new employees

*See Definitions

C6. EMPLOYEE SAFETY TRAINING

12	8	4	0
<ul style="list-style-type: none"> • Based on an annual safety training needs assessment, a database is developed and instituted (i.e., who needs what, when and who will train) • Formal safety training topics include, but are not limited to: <ul style="list-style-type: none"> - 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.) - First Aid/CPR/AED - OSHA topics (e.g., PPE, hazcom, electrical, scaffold, ladder/stairs, fire prevention and protection, tool safety, fall protection and prevention, etc.) - Driver safety - Pertinent DOT compliance and CDL annual training • Training is conducted by competent/qualified safety instructors • Companies set minimum levels of training, annually. (OSHA refresher courses, First Aid/CPR, etc.) Offer families to participate in First Aid/CPR and allow employees opportunities to train employees. Offer safety training to anyone (position/role) within company structure • Employee training comprehension and understanding is verified and documented (e.g., test, skills assessment, etc.) • Records are kept of all training – date, attendees, topics covered and trainer 	<ul style="list-style-type: none"> • Safety training needs are determined each year, but a formal assessment and database are not used • Formal safety training topics include: <ul style="list-style-type: none"> - 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.) - First Aid/CPR/AED - OSHA topics (e.g., PPE, hazcom, electrical, scaffold, ladder/ stairs, fire prevention and protection, tool safety, fall protection and prevention, etc.) • Training is conducted by competent/qualified safety instructors • Employees are only retrained as required by OSHA and when they visibly lacking safety skills • Companies identify training by role/positions but may not have discipline to follow up or ensure employees understand the need. 	<ul style="list-style-type: none"> • Informal or on-the-job safety training is arranged as needed • There is no established training matrix or database • Limited or no training documentation is kept • Companies executives exempt from training classes. 	<ul style="list-style-type: none"> • No formal safety training is provided

C7. BEHAVIOR-BASED SAFETY (BBS)*

6	4	2	0
<ul style="list-style-type: none"> • BBS process is written and the entire company, including top management, has been formally trained in the process of conducting an observation • BBS observations are conducted at least daily • Data is analyzed weekly and trends are communicated throughout the organization • The process allows employees to submit observations anonymously • Top management participates in the process, conducting at least one observation per month • Site management reviews data weekly and modifies work practices to reduce trends • BBS data is shared with site personnel weekly 	<ul style="list-style-type: none"> • BBS process is written, and the all employees have been trained in the process of conducting an observation • BBS observations are conducted, collected and analyzed monthly • The process allows employees to submit observations anonymously • Top management reviews the data monthly, but may or may not conduct an observation • Site management reviews data monthly and modifies work practices to reduce trends • BBS data is shared with site personnel biweekly 	<ul style="list-style-type: none"> • An observation process is in place but is not a formal policy or procedure • BBS observations are conducted at least monthly • Participation by employees is encouraged • Site management reviews data bi-monthly • BBS data is shared with site personnel monthly 	<ul style="list-style-type: none"> • No BBS process is in place

*See Definitions

C8. SUPERVISOR SAFETY TRAINING

9	6	3	0
<ul style="list-style-type: none"> • All supervisory personnel receive training in: <ul style="list-style-type: none"> - Company safety policy - Employer's supervisor safety expectations - First Aid/CPR/AED - OSHA 30 - Competent person for trade/task-specific topics - Emergency response procedures - Completing an incident investigation - Conducting a jobsite safety inspection or BBS observation - Creating a job safety analysis - Key points in Leadership and Human Resources - Conducting effective meetings • Opportunities for professional development are offered and employees participate in annual refresher safety training • Supervisors have access to a safety subject matter expert (SME) • Dedicated training facilities are available with competent/qualified trainers 	<ul style="list-style-type: none"> • All Supervisory personnel receive training in: <ul style="list-style-type: none"> - Company safety policy - Employer's supervisor safety expectations - First Aid/CPR/AED - OSHA 10 - Competent person for trade/task-specific topics - Emergency response procedures - Completing an incident investigation - Conducting a jobsite safety inspection or BBS observation - Competent/qualified trainers are used • Supervisors have access to sources of safety information or knowledge • Annual refresher training is available, but not mandatory 	<ul style="list-style-type: none"> • Supervisory personnel receive safety training in: <ul style="list-style-type: none"> - Company safety policy - Employer's supervisor safety expectations - First Aid/CPR/AED - OSHA 10 - Competent person for trade/task-specific topics - Emergency response - Completing an incident investigation - Conducting a jobsite safety inspection or BBS observation 	<ul style="list-style-type: none"> • There is no specific training program for supervisory personnel

PROCESS

P1. INCIDENT INVESTIGATION

9	6	3	0
<ul style="list-style-type: none"> • Employer reviews all incidents including good catches and potential significant events (PSE). • 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 • Incidents are investigated promptly by top management and safety department personnel and a preliminary report is communicated within 24-48 hours • Reports are completed for all incidents • Documented corrective actions taken • Final incident outcomes are openly shared across the organization to improve overall safety performance 	<ul style="list-style-type: none"> • Supervisors receive a basic level of incident investigation training • Incidents, good catches and potential significant events are investigated by site supervision • Reports are completed for all incidents • Remedial actions are taken to prevent recurrence of similar incidents • Employer reviews only serious incidents • Final notification of incidents is communicated to all stakeholders 	<ul style="list-style-type: none"> • Supervisors receive little or no incident investigation training • Incidents are usually investigated by site supervision, but may be investigated by someone else • Reports are not always completed and communicated in a timely manner • Little or no attempt is made to identify causal factors or take corrective actions • Lessons learned are not shared openly across the organization 	<ul style="list-style-type: none"> • Incidents are not investigated to determine causal factors

P2. PRE-PLANNING FOR PROJECT SAFETY*

6	4	2	0
<ul style="list-style-type: none"> • Project supervision and other key personnel are trained in pre-planning for project safety • Safety pre-planning is integrated into the estimate, bid and mobilization/ demobilization stages of projects • A checklist or similar document is used to ensure a consistent and comprehensive approach to exposure evaluation and resource needs • Project safety plans are regularly updated throughout life of project • Contractor Key components of the pre-plan (including updates) are communicated with all site employees (including specialty contractors, if applicable) before implementation 	<ul style="list-style-type: none"> • Project supervisory personnel may have received some training in the safety pre-planning process, but it is not required • Safety pre-planning is required prior to start of site work • A checklist or similar document serves as a guide through the process • Safety resources are provided as needed 	<ul style="list-style-type: none"> • There is no established procedure for project safety pre-planning, but some planning is done • No checklist or other document is used as a guide • Safety resources are often provided only after problems or needs have been encountered 	<ul style="list-style-type: none"> • No safety pre-planning is done

P3. EMERGENCY RESPONSE/FIRE ELIMINATION PLAN

6	4	2	0
<ul style="list-style-type: none"> • Company has a comprehensive fire elimination plan (FEP) that includes the following, at a minimum: <ul style="list-style-type: none"> - If general contractor, all tiered contractors are contractually bound to follow the FEP - Training on the selection, use and maintenance of portable fire extinguishers - Hot work recognition, training and permitting to include a 30-minute fire watch - Only approved flammable and combustible containers are used or allowed onsite - Frequent and consistent disposal of combustible material (housekeeping) - Evacuation, assembly point and head count procedures are published, posted and communicated - Compressed gas is handled, stored and used per manufacturer's recommendations - Evacuation procedures and assembly points are established 	<ul style="list-style-type: none"> • Company has fire elimination plan (FEP) that includes the following, at a minimum: <ul style="list-style-type: none"> - Training on the selection, use and maintenance of portable fire extinguishers - Hot work recognition, training and permitting to include a 30-minute fire watch - Evacuation, assembly point and head count procedures are published, posted and communicated - Compressed gas is handled, stored and used per manufacturer's recommendations • Evacuation procedures are established, but not consistently communicated 	<ul style="list-style-type: none"> • Company has fire elimination plan (FEP) that includes the following, at a minimum: <ul style="list-style-type: none"> - Annual toolbox topic and demonstration of how to use a fire extinguisher - Informally communicated, but not documented, evacuation and head count procedures 	<ul style="list-style-type: none"> • No Emergency Response/FEP exists

*See Definitions

P4. TASK-SPECIFIC SAFETY PROCESS*

6	4	2	0
<ul style="list-style-type: none"> • A task-specific safety process has been established and is consistently used across the company • The process is reviewed annually by top management • All personnel are trained in using the process • 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. • Change of conditions require work to be stopped, the process is reviewed and altered to complete the work safely • Policy includes, at a minimum, the following; <ul style="list-style-type: none"> - definition of scope of work - hazard analysis and control methods - continuous improvement provisions 	<ul style="list-style-type: none"> • A process exists and is utilized on site • Supervisory personnel have received training on completing the task-specific planning process • The plan is completed prior to the start of onsite operations • When conditions change the plan is reviewed for corrections • Employees have read, understood and signed off on the plan 	<ul style="list-style-type: none"> • A policy exists but is not consistently utilized on site • A plan exists but is only completed for high- hazard/risk operations • Forms are not reviewed after the work is completed 	<ul style="list-style-type: none"> • No task-specific plan exists

P5. SAFETY RULES

9	6	3	0
<ul style="list-style-type: none"> • Safety rules are: <ul style="list-style-type: none"> - In writing and are part of the employee safety policy - Explained to employees at time of new hire orientation - Clear, concise and easy to understand - Specific to trade and/or scope of work operations - Enforced equally among all employees - Regularly updated to reflect change in company policy and/or regulation - Specialty contractors are contractually bound to the general contractor's safety program 	<ul style="list-style-type: none"> • Safety rules are: <ul style="list-style-type: none"> - In writing and posted, but not necessarily in the employee safety policy - Explained to employees at one time or another - Specific to trade and/or scope of work operations - Usually enforced equally among all employees - Periodically updated to reflect change in company policy and/ or regulation - If the company is a general contractor (GC), specialty contractors are encouraged to comply with their safety rules 	<ul style="list-style-type: none"> • Some general safety rules exist, but they are not posted or reviewed with employees • Rules that do exist are boilerplate rules and are not necessarily specific to the company's trade and/or scope of operations • Safety rules are not regularly enforced • Safety rules are rarely reviewed or updated • Specialty contractors are not required to follow the GC's safety rules 	<ul style="list-style-type: none"> • There are no safety rules

P6. TOOLBOX SAFETY TALKS

6	4	2	0
<ul style="list-style-type: none"> • Toolbox talks are held daily • Employees routinely lead the talks • The highest-level supervisors onsite are present and participate in the talks • Top management occasionally attends and participates • Attendance and topics are documented 	<ul style="list-style-type: none"> • Toolbox talks are held regularly— at least weekly • Attendance and topics are documented • Supervisors actively solicit employee participation (e.g., volunteer to present talk, share experience, Q&A, etc.) • The highest-level supervisors are present and participate • Top management occasionally attends 	<ul style="list-style-type: none"> • Attendance and topics are documented • Employees are encouraged to participate 	<ul style="list-style-type: none"> • Toolbox talks are not held or held only occasionally (less than once per month)

*See Definitions

P7. SAFETY INSPECTIONS

9	6	3	0
<ul style="list-style-type: none"> • Monthly jobsite safety inspections are conducted by project manager(s) • Weekly jobsite safety inspections are conducted by the site superintendent(s) • Daily jobsite safety inspections are conducted by the site foremen • Inspection is documented, along with assignment of responsibility and expected completion date • Potentially serious safety issues are corrected immediately • Less serious safety issues are corrected promptly • Follow-up process to confirm action taken and that it is producing expected results 	<ul style="list-style-type: none"> • Quarterly jobsite safety inspections are conducted by project manager(s) • Monthly jobsite inspections are conducted by the site superintendent(s) • Inspection is documented, along with assignment of responsibility and expected completion date • Potentially serious safety issues are corrected immediately • Less serious safety issues are corrected promptly 	<ul style="list-style-type: none"> • Informal jobsite inspections (walk-through) are made by the site superintendent • There is no documentation or follow-up • Safety issues are corrected, in a timely, unspecified manner 	<ul style="list-style-type: none"> • No inspections are conducted

P8. USE OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

9	6	3	0
<ul style="list-style-type: none"> • Company has a written PPE policy • Company conducts an annual PPE needs assessment that is documented • Company continually invests in new and updated PPE, as needed • Processes are instituted by which the suitability and effectiveness of PPE is evaluated by field personnel • Employees are informed of PPE requirements for each job • Employees are trained, prior to use, in PPE selection, inspection, use and care • PPE refresher training is conducted at least annually • Company PPE policy is consistently and universally enforced 	<ul style="list-style-type: none"> • The company has a written PPE policy • Employees are informed of PPE requirements for each job • Employees are trained in PPE selection, inspection, use and care • Company PPE policy is consistently and universally enforced 	<ul style="list-style-type: none"> • A PPE policy exists, but is rarely enforced without pressure from controlling contractors or owners • PPE is provided, and its use encouraged • Some training on PPE use is provided • Company PPE policy is enforced inconsistently 	<ul style="list-style-type: none"> • 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 style="list-style-type: none"> • The company maintains accurate and current records and documents for: <ul style="list-style-type: none"> - OSHA injury and illness records (reports, 300 logs and 300A summary log) - Safety training, including verification of learning (test, skills evaluation, etc.) - OSHA-required written programs - Employee safety policy - Incident investigations - Equipment inspections are documented - Site inspections/surveys, including verification of action taken - Safety orientations - Safety pre-planning - Loss run analysis - Employee exposure and monitoring data and reports - Safety committee meeting minutes 	<ul style="list-style-type: none"> • The company maintains records and documents for: <ul style="list-style-type: none"> - OSHA injury and illness records (reports, 300 logs and 300A summary log) - Safety training - OSHA-required written programs - Employee safety policy - Incident investigations and near fatality/good catches - Safety inspections/surveys - Equipment, including mobile equipment 	<ul style="list-style-type: none"> • The company maintains minimal records, which may or may not be up to date: <ul style="list-style-type: none"> - OSHA injury and illness records (reports, 300 logs and 300A summary log) - Basic safety policy 	<ul style="list-style-type: none"> • No records are kept for safety-related activities or policies

P10. WORK ZONE/MOBILE EQUIPMENT/VEHICLE SAFETY

6	4	2	0
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • The company has a distracted driving policy in place that addresses no texting while driving company vehicles. • 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). 	<ul style="list-style-type: none"> • Flagging personnel are utilized to control traffic, but there is no formal requirement to ensure they are certified. • 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. 	<ul style="list-style-type: none"> • The Company lacks a defensive driving or phone use policy. • 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 style="list-style-type: none"> • Top management reviews leading indicator data monthly • Leading Indicators are defined; are not post injury related • Leading indicator data is collected daily and inputted into a format (e.g., spreadsheet, safety app) for analysis • Site management reviews leading indicator data weekly • Leading indicator data is analyzed for trends against previous week(s) • Construction site management reviews leading indicator data weekly and adjust work practices accordingly • Company has identified a minimum of four leading indicators 	<ul style="list-style-type: none"> • Leading indicators are defined; are not post-injury related • Leading indicator data is collected weekly and inputted into a format (e.g., spreadsheet, safety app) for analysis • Site management reviews leading indicator data monthly • Company has identified a minimum of two leading indicators that are not injury related 	<ul style="list-style-type: none"> • Leading indicator data is collected monthly • Company has identified a leading indicator that is not injury related 	<ul style="list-style-type: none"> • No process in place to track leading indicators

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

6	4	2	0
<ul style="list-style-type: none"> • Key company personnel are trained to know the meaning and relevance of key safety performance indicators (KSPI) e.g., EMR, TRIR, DART • EMR of the current and previous year is below 0.80 (0.90 for companies with fewer than 100 employees) • Employer regularly reviews claims, claim costs and claim trends to gauge impact on company and guide resource allocation 	<ul style="list-style-type: none"> • Key company personnel are familiar with KSPI's, but may not fully understand meaning or relevance • EMR of the current and previous year is below 0.90 (1.0 for companies with fewer than 100 employees) • Employer reviews claims with insurer as part of workers' comp policy renewal process 	<ul style="list-style-type: none"> • Key company personnel are not familiar with KSPI's • EMR for current year is at or below 1.0, or; • Is at least 1.0 in one of the previous two years, or • Has decreased two of previous three years 	<ul style="list-style-type: none"> • KSPI are unknown



**Leadership
Commitment**

**Cultural
Transformation**

**Process
and Systems**

Results

2022 **STEP** CONTRACTOR **KEY COMPONENTS**



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CONTRACTOR KEY COMPONENTS OF SAFETY SELF-ASSESSMENT WORKSHEET

The Contractor 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 Contractor Key Components will automatically be rounded down to the nearest listed score.

LEADERSHIP

L1. TOP MANAGEMENT ENGAGEMENT

12	8	4	0
<ul style="list-style-type: none"> • Owner/CEO/top management leadership directly and actively participates in the safety process • Top management instills personal accountability for safety throughout the company • Top management tracks and biannually reviews safety goals/objectives for the company • Top management solicits continuous feedback on the safety process • Top management commits resources (money, time, personnel, equipment, supplies, etc.) for the safety process necessary to achieve goals • Safety performance is assessed in everyone's performance appraisal (executive and field employees) • Top management integrates safety into every facet of company operation 	<ul style="list-style-type: none"> • Top management participates in the safety process • Personal accountability for safety is expected, but there is little or no recourse if not demonstrated • Top management is aware of safety process goals/ objectives, but does not track progress • Top management provides the resources necessary for safety compliance 	<ul style="list-style-type: none"> • Top management supports safety, but does not actively participate • There is little personal accountability for safety – a "just be careful" culture exists • Limited funds are provided for safety 	<ul style="list-style-type: none"> • Top management is not involved in the safety process and demonstrates little interest in it • Safety is left to supervisory personnel to handle "as needed" • There is no accountability for safety • Little or no funding is provided for safety

L2. SAFETY POLICY STATEMENT

6	4	2	0
<ul style="list-style-type: none"> • Is in writing and is signed and by top management • Is explained to employees at time of new hire orientation • Explains the value of safety in the company • Commits to protecting employees, continually improving the program, involving employees in the safety process and meeting regulatory obligations • States universal accountability for safety in the company • Is posted or part of employee safety policy 	<ul style="list-style-type: none"> • Policy exists and is in writing • Policy is not explained to employees, but most know of its existence • Explains employer's general commitment to a safe workplace • Is posted, is part of the employee safety policy or is in the company safety manual 	<ul style="list-style-type: none"> • Policy exists, but is not posted nor in safety manual • Not explained to employees and most do not know 	<ul style="list-style-type: none"> • No policy exists

L3. SAFETY RESPONSIBILITIES

9	6	3	0
<ul style="list-style-type: none"> Responsibilities for safety are clearly defined for everyone in the company, including 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. Supervisory personnel have additional responsibilities that are reviewed with them at time of hire or promotion A policy to hold everyone accountable (including specialty contractors) for safety is in place and is universally applied. 	<ul style="list-style-type: none"> Responsibility for safety is defined for everyone in company Accountability for safety is not always universally applied Explained to employees at time of new hire orientation Is in writing and is part of employee safety policy 	<ul style="list-style-type: none"> Responsibility for safety rests solely with a designated safety coordinator or safety committee Responsibilities are not in writing All employees know is that they are responsible for "being safe" There is little or no accountability for safety 	<ul style="list-style-type: none"> Responsibility for safety has not been defined within the company

L4. RESOURCES FOR SAFETY

6	4	2	0
<ul style="list-style-type: none"> All safety resources (funds, time, personnel, equipment, supplies, etc.) are regularly budgeted or invested. Return on safety investment is tracked (actual or projected) to evaluate effectiveness of resource allocation and to guide future expenditure decisions Resource funding and expectations are explained to supervisory personnel upon hire or promotion 	<ul style="list-style-type: none"> Reasonable resources are budgeted or invested in safety Supervisory personnel are generally aware of company resources available 	<ul style="list-style-type: none"> Minimal investments are made in safety Money is taken from general funds as needed to react to safety needs (GC mandates, OSHA fines, incidents, etc.) 	<ul style="list-style-type: none"> Resources are not made available for safety

L5. SAFETY PROGRAM PERFORMANCE REVIEW

6	4	2	0
<ul style="list-style-type: none"> Top management reviews the safety program performance biannually The emphasis of the review is on whether the program is producing expected results and where opportunities for improvement exist Defined criteria exist against which performance is measured (e.g., safety surveys conducted, trainings held, incidence rates, loss ratios, progress toward annual goals, safety meetings, OSHA inspection record, prevention of recurring incidents/ hazards, employee participation, etc.) Results are documented Results impact safety staff and supervisor annual performance evaluations Following each review, meetings are conducted with safety staff and supervisory personnel to discuss results and expectations 	<ul style="list-style-type: none"> Top management reviews the safety program annually Some criteria exist against which performance is measured Process is not documented Results do not significantly affect safety staff and/or supervisor evaluations Results are eventually discussed with safety staff and/or supervisory personnel 	<ul style="list-style-type: none"> Regular (pre-determined frequency) reviews of safety program performance does not occur Limited top management involvement—mainly left to someone else (safety administrator, insurance company, etc.) Subjective review of safety activities – mainly serves as a "year in review" and not an assessment of performance and improvement opportunity Results may or may not be reviewed with supervisory personnel 	<ul style="list-style-type: none"> No review of safety program performance is performed

CULTURE

C1. EMPLOYEE PARTICIPATION

9	6	3	0
<ul style="list-style-type: none"> • 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.) • Supervisory personnel are aware of these opportunities and actively encourage employee involvement • 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 	<ul style="list-style-type: none"> • Opportunities for employees to participate in safety process exist, but are not specifically documented • Supervisors are provided limited training in soliciting employee participation, but nonetheless encourage involvement • Employees may be aware of opportunities, but there are no specific participation expectations • There is a limited focus on identifying and eliminating potential barriers to participation 	<ul style="list-style-type: none"> • Employees are encouraged to participate in the safety process, but no concerted efforts are made to engage them • Employees are offered a general communication channel: "If you have any questions or concerns, speak with your foreman." • An employee suggestion/comment process is in place 	<ul style="list-style-type: none"> • There are no opportunities for employees to participate in the safety process

C2. SUBSTANCE ABUSE PROGRAM

6	4	2	0
<ul style="list-style-type: none"> • The company's safety policy explains its substance abuse program • The policy includes random, pre-employment and reasonable suspicion substance abuse testing • The policy is consistent and actively enforced • Supervisory personnel are trained in workplace substance abuse recognition • Employee substance abuse prevention education initiatives are offered • The company has an employee assistance program (EAP) • The company keeps counseling and testing records • Specialty contractors are contractually required to have programs equal to or exceeding the general contractors 	<ul style="list-style-type: none"> • The company has substance abuse verbiage in the employee safety policy • Substance abuse testing is for pre-employment only • The company makes a minimal effort to enforce policy • Supervisors are trained in hazards of substance abuse on the job • Specialty contractors are contractually required to conduct pre employment testing 	<ul style="list-style-type: none"> • The company has substance abuse verbiage in its safety manual • Drug/alcohol testing is inconsistent • Company makes no or little effort to enforce the policy • Subcontract language does not include compliance 	<ul style="list-style-type: none"> • The company has no policy regarding substance abuse testing

C3. SAFETY PROGRAM GOAL SETTING

9	6	3	0
<ul style="list-style-type: none"> • A formal process is in place to annually assess or establish safety program goals • Action plans are developed, documented and implemented to assure goals are accomplished in a timely manner • Progression of action plans are tracked, with status reports and feedback from those assigned the tasks • Top management reviews goals, action plans and status reports with staff to provide feedback, direction and support of initiatives • Process is in place to evaluate degree of effectiveness action plan had in achieving end goal 	<ul style="list-style-type: none"> • Safety program goals are established periodically • A plan to achieve goals has been decided, but not documented • Status of action plan is informally checked, but with no set frequency and with little follow-up or solicitation of feedback • Top management plays minor part in safety goal-setting process • No process is in place to gauge the effectiveness of the action plan in achieving end goal 	<ul style="list-style-type: none"> • Informal or infrequent safety program goals are established • There is little or no documentation or employee knowledge of goals • No realistic action plans are developed to accomplish goals • Top management is not involved • Goals seldom tracked, reviewed or achieved 	<ul style="list-style-type: none"> • There is no process of safety program goal-setting

C4. SUPERVISOR SAFETY MEETINGS*

9	6	3	0
<ul style="list-style-type: none"> • The employer conducts weekly supervisor safety meetings • The employer begins each meeting with a safety moment • Meetings include: <ul style="list-style-type: none"> - A dedicated safety training topic, rotated weekly - pre-planning discussions - lessons learned - review of serious incidents 	<ul style="list-style-type: none"> • At least monthly, the employer conducts supervisor safety meetings • Meeting includes a status report on site safety activities • Serious incidents are reviewed 	<ul style="list-style-type: none"> • Supervisor safety meetings are held occasionally (less than monthly) • There is general discussion of the safety information given to supervisors • Serious incidents are usually reviewed 	<ul style="list-style-type: none"> • The employer does not conduct supervisor safety meetings

C5. NEW HIRE SAFETY ORIENTATION

6	4	2	0
<ul style="list-style-type: none"> • 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) • Safety orientation topics include, but are not limited to: <ul style="list-style-type: none"> - Explanation of employer safety commitment and expectations - Individual safety responsibilities and accountability - PPE expectations with skills demonstration (wearing harness, adjusting guards, PPE use, etc.) - Basic and advanced safety rules that pertain to site and/or major job hazard exposures - Hazard communication - Hazard, injury and emergency reporting procedures - Review of substance abuse policy - Identity of key competent persons and their specific roles - Orientation platforms include instructor-led, video published training and other written materials • New hires are assigned a special designation (decal, hard hat color) or safety mentor until their orientation process is complete • New hire performance evaluation process is established to give feedback to new hires on pre-determined frequency (30 days and 60 days) • Documented records are maintained showing initial/promotion employee safety orientations have occurred 	<ul style="list-style-type: none"> • Safety orientation is given to new employees; however, the process has not been formalized • Safety orientation topics include at a minimum: <ul style="list-style-type: none"> - 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 • There is no new hire performance evaluation process • Record of safety orientation, with employee signature, is maintained 	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • No orientation is given to new employees

*See Definitions

C6. EMPLOYEE SAFETY TRAINING

12	8	4	0
<ul style="list-style-type: none"> • Based on an annual safety training needs assessment, a database is developed and instituted (i.e., who needs what, when and who will train) • Formal safety training topics include, but are not limited to: <ul style="list-style-type: none"> - 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.) - First Aid/CPR/AED - OSHA topics (e.g., PPE, hazcom, electrical, scaffold, ladder/stairs, fire prevention and protection, tool safety, fall protection and prevention, etc.) - Driver safety - Pertinent DOT compliance and CDL annual training • Training is conducted by competent/qualified safety instructors • Companies set minimum levels of training, annually. (OSHA refresher courses, First Aid/CPR, etc.) Offer families to participate in First Aid/CPR and allow employees opportunities to train employees. Offer safety training to anyone (position/role) within company structure • Employee training comprehension and understanding is verified and documented (e.g., test, skills assessment, etc.) • Records are kept of all training – date, attendees, topics covered and trainer 	<ul style="list-style-type: none"> • Safety training needs are determined each year, but a formal assessment and database are not used • Formal safety training topics include: <ul style="list-style-type: none"> - 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.) - First Aid/CPR/AED - OSHA topics (e.g., PPE, hazcom, electrical, scaffold, ladder/ stairs, fire prevention and protection, tool safety, fall protection and prevention, etc.) • Training is conducted by competent/qualified safety instructors • Employees are only retrained as required by OSHA and when they visibly lacking safety skills • Companies identify training by role/positions but may not have discipline to follow up or ensure employees understand the need. 	<ul style="list-style-type: none"> • Informal or on-the-job safety training is arranged as needed • There is no established training matrix or database • Limited or no training documentation is kept • Companies executives exempt from training classes. 	<ul style="list-style-type: none"> • No formal safety training is provided

C7. BEHAVIOR-BASED SAFETY (BBS)*

6	4	2	0
<ul style="list-style-type: none"> • BBS process is written and the entire company, including top management, has been formally trained in the process of conducting an observation • BBS observations are conducted at least daily • Data is analyzed weekly and trends are communicated throughout the organization • The process allows employees to submit observations anonymously • Top management participates in the process, conducting at least one observation per month • Site management reviews data weekly and modifies work practices to reduce trends • BBS data is shared with site personnel weekly 	<ul style="list-style-type: none"> • BBS process is written, and the all employees have been trained in the process of conducting an observation • BBS observations are conducted, collected and analyzed monthly • The process allows employees to submit observations anonymously • Top management reviews the data monthly, but may or may not conduct an observation • Site management reviews data monthly and modifies work practices to reduce trends • BBS data is shared with site personnel biweekly 	<ul style="list-style-type: none"> • An observation process is in place but is not a formal policy or procedure • BBS observations are conducted at least monthly • Participation by employees is encouraged • Site management reviews data bi-monthly • BBS data is shared with site personnel monthly 	<ul style="list-style-type: none"> • No BBS process is in place

*See Definitions

C8. SUPERVISOR SAFETY TRAINING

9	6	3	0
<ul style="list-style-type: none"> • All supervisory personnel receive training in: <ul style="list-style-type: none"> - Company safety policy - Employer's supervisor safety expectations - First Aid/CPR/AED - OSHA 30 - Competent person for trade/task-specific topics - Emergency response procedures - Completing an incident investigation - Conducting a jobsite safety inspection or BBS observation - Creating a job safety analysis - Key points in Leadership and Human Resources - Conducting effective meetings • Opportunities for professional development are offered and employees participate in annual refresher safety training • Supervisors have access to a safety subject matter expert (SME) • Dedicated training facilities are available with competent/qualified trainers 	<ul style="list-style-type: none"> • All Supervisory personnel receive training in: <ul style="list-style-type: none"> - Company safety policy - Employer's supervisor safety expectations - First Aid/CPR/AED - OSHA 10 - Competent person for trade/task-specific topics - Emergency response procedures - Completing an incident investigation - Conducting a jobsite safety inspection or BBS observation - Competent/qualified trainers are used • Supervisors have access to sources of safety information or knowledge • Annual refresher training is available, but not mandatory 	<ul style="list-style-type: none"> • Supervisory personnel receive safety training in: <ul style="list-style-type: none"> - Company safety policy - Employer's supervisor safety expectations - First Aid/CPR/AED - OSHA 10 - Competent person for trade/task-specific topics - Emergency response - Completing an incident investigation - Conducting a jobsite safety inspection or BBS observation 	<ul style="list-style-type: none"> • There is no specific training program for supervisory personnel

PROCESS

P1. INCIDENT INVESTIGATION

9	6	3	0
<ul style="list-style-type: none"> • Employer reviews all incidents including good catches and potential significant events (PSE). • 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 • Incidents are investigated promptly by top management and safety department personnel and a preliminary report is communicated within 24-48 hours • Reports are completed for all incidents • Documented corrective actions taken • Final incident outcomes are openly shared across the organization to improve overall safety performance 	<ul style="list-style-type: none"> • Supervisors receive a basic level of incident investigation training • Incidents, good catches and potential significant events are investigated by site supervision • Reports are completed for all incidents • Remedial actions are taken to prevent recurrence of similar incidents • Employer reviews only serious incidents • Final notification of incidents is communicated to all stakeholders 	<ul style="list-style-type: none"> • Supervisors receive little or no incident investigation training • Incidents are usually investigated by site supervision, but may be investigated by someone else • Reports are not always completed and communicated in a timely manner • Little or no attempt is made to identify causal factors or take corrective actions • Lessons learned are not shared openly across the organization 	<ul style="list-style-type: none"> • Incidents are not investigated to determine causal factors

P2. PRE-PLANNING FOR PROJECT SAFETY*

6	4	2	0
<ul style="list-style-type: none"> • Project supervision and other key personnel are trained in pre-planning for project safety • Safety pre-planning is integrated into the estimate, bid and mobilization/ demobilization stages of projects • A checklist or similar document is used to ensure a consistent and comprehensive approach to exposure evaluation and resource needs • Project safety plans are regularly updated throughout life of project • Contractor Key components of the pre-plan (including updates) are communicated with all site employees (including specialty contractors, if applicable) before implementation 	<ul style="list-style-type: none"> • Project supervisory personnel may have received some training in the safety pre-planning process, but it is not required • Safety pre-planning is required prior to start of site work • A checklist or similar document serves as a guide through the process • Safety resources are provided as needed 	<ul style="list-style-type: none"> • There is no established procedure for project safety pre-planning, but some planning is done • No checklist or other document is used as a guide • Safety resources are often provided only after problems or needs have been encountered 	<ul style="list-style-type: none"> • No safety pre-planning is done

P3. EMERGENCY RESPONSE/FIRE ELIMINATION PLAN

6	4	2	0
<ul style="list-style-type: none"> • Company has a comprehensive fire elimination plan (FEP) that includes the following, at a minimum: <ul style="list-style-type: none"> - If general contractor, all tiered contractors are contractually bound to follow the FEP - Training on the selection, use and maintenance of portable fire extinguishers - Hot work recognition, training and permitting to include a 30-minute fire watch - Only approved flammable and combustible containers are used or allowed onsite - Frequent and consistent disposal of combustible material (housekeeping) - Evacuation, assembly point and head count procedures are published, posted and communicated - Compressed gas is handled, stored and used per manufacturer's recommendations - Evacuation procedures and assembly points are established 	<ul style="list-style-type: none"> • Company has fire elimination plan (FEP) that includes the following, at a minimum: <ul style="list-style-type: none"> - Training on the selection, use and maintenance of portable fire extinguishers - Hot work recognition, training and permitting to include a 30-minute fire watch - Evacuation, assembly point and head count procedures are published, posted and communicated - Compressed gas is handled, stored and used per manufacturer's recommendations • Evacuation procedures are established, but not consistently communicated 	<ul style="list-style-type: none"> • Company has fire elimination plan (FEP) that includes the following, at a minimum: <ul style="list-style-type: none"> - Annual toolbox topic and demonstration of how to use a fire extinguisher - Informally communicated, but not documented, evacuation and head count procedures 	<ul style="list-style-type: none"> • No Emergency Response/FEP exists

*See Definitions

P4. TASK-SPECIFIC SAFETY PROCESS*

6	4	2	0
<ul style="list-style-type: none"> • A task-specific safety process has been established and is consistently used across the company • The process is reviewed annually by top management • All personnel are trained in using the process • 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. • Change of conditions require work to be stopped, the process is reviewed and altered to complete the work safely • Policy includes, at a minimum, the following; <ul style="list-style-type: none"> - definition of scope of work - hazard analysis and control methods - continuous improvement provisions 	<ul style="list-style-type: none"> • A process exists and is utilized on site • Supervisory personnel have received training on completing the task-specific planning process • The plan is completed prior to the start of onsite operations • When conditions change the plan is reviewed for corrections • Employees have read, understood and signed off on the plan 	<ul style="list-style-type: none"> • A policy exists but is not consistently utilized on site • A plan exists but is only completed for high- hazard/risk operations • Forms are not reviewed after the work is completed 	<ul style="list-style-type: none"> • No task-specific plan exists

P5. SAFETY RULES

9	6	3	0
<ul style="list-style-type: none"> • Safety rules are: <ul style="list-style-type: none"> - In writing and are part of the employee safety policy - Explained to employees at time of new hire orientation - Clear, concise and easy to understand - Specific to trade and/or scope of work operations - Enforced equally among all employees - Regularly updated to reflect change in company policy and/or regulation - Specialty contractors are contractually bound to the general contractor's safety program 	<ul style="list-style-type: none"> • Safety rules are: <ul style="list-style-type: none"> - In writing and posted, but not necessarily in the employee safety policy - Explained to employees at one time or another - Specific to trade and/or scope of work operations - Usually enforced equally among all employees - Periodically updated to reflect change in company policy and/ or regulation - If the company is a general contractor (GC), specialty contractors are encouraged to comply with their safety rules 	<ul style="list-style-type: none"> • Some general safety rules exist, but they are not posted or reviewed with employees • Rules that do exist are boilerplate rules and are not necessarily specific to the company's trade and/or scope of operations • Safety rules are not regularly enforced • Safety rules are rarely reviewed or updated • Specialty contractors are not required to follow the GC's safety rules 	<ul style="list-style-type: none"> • There are no safety rules

P6. TOOLBOX SAFETY TALKS

6	4	2	0
<ul style="list-style-type: none"> • Toolbox talks are held daily • Employees routinely lead the talks • The highest-level supervisors onsite are present and participate in the talks • Top management occasionally attends and participates • Attendance and topics are documented 	<ul style="list-style-type: none"> • Toolbox talks are held regularly— at least weekly • Attendance and topics are documented • Supervisors actively solicit employee participation (e.g., volunteer to present talk, share experience, Q&A, etc.) • The highest-level supervisors are present and participate • Top management occasionally attends 	<ul style="list-style-type: none"> • Attendance and topics are documented • Employees are encouraged to participate 	<ul style="list-style-type: none"> • Toolbox talks are not held or held only occasionally (less than once per month)

*See Definitions

P7. SAFETY INSPECTIONS

9	6	3	0
<ul style="list-style-type: none"> • Monthly jobsite safety inspections are conducted by project manager(s) • Weekly jobsite safety inspections are conducted by the site superintendent(s) • Daily jobsite safety inspections are conducted by the site foremen • Inspection is documented, along with assignment of responsibility and expected completion date • Potentially serious safety issues are corrected immediately • Less serious safety issues are corrected promptly • Follow-up process to confirm action taken and that it is producing expected results 	<ul style="list-style-type: none"> • Quarterly jobsite safety inspections are conducted by project manager(s) • Monthly jobsite inspections are conducted by the site superintendent(s) • Inspection is documented, along with assignment of responsibility and expected completion date • Potentially serious safety issues are corrected immediately • Less serious safety issues are corrected promptly 	<ul style="list-style-type: none"> • Informal jobsite inspections (walk-through) are made by the site superintendent • There is no documentation or follow-up • Safety issues are corrected, in a timely, unspecified manner 	<ul style="list-style-type: none"> • No inspections are conducted

P8. USE OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

9	6	3	0
<ul style="list-style-type: none"> • Company has a written PPE policy • Company conducts an annual PPE needs assessment that is documented • Company continually invests in new and updated PPE, as needed • Processes are instituted by which the suitability and effectiveness of PPE is evaluated by field personnel • Employees are informed of PPE requirements for each job • Employees are trained, prior to use, in PPE selection, inspection, use and care • PPE refresher training is conducted at least annually • Company PPE policy is consistently and universally enforced 	<ul style="list-style-type: none"> • The company has a written PPE policy • Employees are informed of PPE requirements for each job • Employees are trained in PPE selection, inspection, use and care • Company PPE policy is consistently and universally enforced 	<ul style="list-style-type: none"> • A PPE policy exists, but is rarely enforced without pressure from controlling contractors or owners • PPE is provided, and its use encouraged • Some training on PPE use is provided • Company PPE policy is enforced inconsistently 	<ul style="list-style-type: none"> • 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 style="list-style-type: none"> • The company maintains accurate and current records and documents for: <ul style="list-style-type: none"> - OSHA injury and illness records (reports, 300 logs and 300A summary log) - Safety training, including verification of learning (test, skills evaluation, etc.) - OSHA-required written programs - Employee safety policy - Incident investigations - Equipment inspections are documented - Site inspections/surveys, including verification of action taken - Safety orientations - Safety pre-planning - Loss run analysis - Employee exposure and monitoring data and reports - Safety committee meeting minutes 	<ul style="list-style-type: none"> • The company maintains records and documents for: <ul style="list-style-type: none"> - OSHA injury and illness records (reports, 300 logs and 300A summary log) - Safety training - OSHA-required written programs - Employee safety policy - Incident investigations and near fatality/good catches - Safety inspections/surveys - Equipment, including mobile equipment 	<ul style="list-style-type: none"> • The company maintains minimal records, which may or may not be up to date: <ul style="list-style-type: none"> - OSHA injury and illness records (reports, 300 logs and 300A summary log) - Basic safety policy 	<ul style="list-style-type: none"> • No records are kept for safety-related activities or policies

P10. WORK ZONE/MOBILE EQUIPMENT/VEHICLE SAFETY

6	4	2	0
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • The company has a distracted driving policy in place that addresses no texting while driving company vehicles. • 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). 	<ul style="list-style-type: none"> • Flagging personnel are utilized to control traffic, but there is no formal requirement to ensure they are certified. • 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. 	<ul style="list-style-type: none"> • The Company lacks a defensive driving or phone use policy. • 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 style="list-style-type: none"> • Top management reviews leading indicator data monthly • Leading Indicators are defined; are not post injury related • Leading indicator data is collected daily and inputted into a format (e.g., spreadsheet, safety app) for analysis • Site management reviews leading indicator data weekly • Leading indicator data is analyzed for trends against previous week(s) • Construction site management reviews leading indicator data weekly and adjust work practices accordingly • Company has identified a minimum of four leading indicators 	<ul style="list-style-type: none"> • Leading indicators are defined; are not post-injury related • Leading indicator data is collected weekly and inputted into a format (e.g., spreadsheet, safety app) for analysis • Site management reviews leading indicator data monthly • Company has identified a minimum of two leading indicators that are not injury related 	<ul style="list-style-type: none"> • Leading indicator data is collected monthly • Company has identified a leading indicator that is not injury related 	<ul style="list-style-type: none"> • No process in place to track leading indicators

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

6	4	2	0
<ul style="list-style-type: none"> • Key company personnel are trained to know the meaning and relevance of key safety performance indicators (KSPI) e.g., EMR, TRIR, DART • EMR of the current and previous year is below 0.80 (0.90 for companies with fewer than 100 employees) • Employer regularly reviews claims, claim costs and claim trends to gauge impact on company and guide resource allocation 	<ul style="list-style-type: none"> • Key company personnel are familiar with KSPI's, but may not fully understand meaning or relevance • EMR of the current and previous year is below 0.90 (1.0 for companies with fewer than 100 employees) • Employer reviews claims with insurer as part of workers' comp policy renewal process 	<ul style="list-style-type: none"> • Key company personnel are not familiar with KSPI's • EMR for current year is at or below 1.0, or; • Is at least 1.0 in one of the previous two years, or • Has decreased two of previous three years 	<ul style="list-style-type: none"> • KSPI are unknown