Improving Owner and Contractor Safety Performance

API RECOMMENDED PRACTICE 2220
CMA MANAGER'S GUIDE
FIRST EDITION, SEPTEMBER 1991

CHEMICAL MANUFACTURERS ASSOCIATION
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Improving Owner and Contractor Safety Performance

API Safety and Fire Protection Department

CMA Engineering and Operations Committee, Health and Safety Committee

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FOREWORD

This publication is intended to assist petroleum and chemical industry facility owners and contractors in improving their safety programs. In addition to the cosponsors, the American Petroleum Institute and the Chemical Manufacturers Association, this publication is supported by the Associated Builders and Contractors, Inc.

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Improving Owner and Contractor Safety Performance

SECTION 1—GENERAL

1.1 Introduction

Owners and contractors need to provide safe workplaces and to protect the safety and health of their work forces and the general public. When they work together to improve the safety and health of contractors, both benefit. Benefits that come from a comprehensive and systematic contractor safety program include the following:

a. Safety and well-being of contractor and owner employees are increased.
b. Improved quality and productivity occur because a comprehensive contractor safety program requires that workers be properly trained for their job tasks and familiar with their job requirements.
c. Fewer incidents result in less need for regulatory action and more controllable project costs.
d. The potential for damage to the owner's facility and the contractor's equipment is minimized.

This publication is intended to help an owner and a contractor improve the contractor's safety performance while preserving the independent contractor relationship. It is intended for the petroleum and chemical industries and the firms that perform contract work for them; however, since the owner sites and the contracted work are diverse, this publication may not be applicable to all operations at each company or to all contract work performed in those operations. As such, this publication may not apply to incidental contractors that generally do not affect facility safety, such as those that provide janitorial, laundry, and delivery services.

1.2 Scope and Objectives

The purpose of this publication is to assist owners and contractors in improving their mutual safety programs. It should be understood that contractors that perform work within the petroleum and chemical industries vary greatly. Some contractors perform construction and turnaround activities and drilling and well servicing; other specialty contractors provide skills and services that are not typically found within an owner's work force. Contractors may even provide services that augment the peak loads and skills of owners' work forces, such as in the maintenance and operation of facilities. These diverse functions and uses of contractors have in common the need for effective safety programs to protect both owner and contractor personnel from workplace injury and illness, as well as from losses associated with incidents arising out of contractor work.

This publication has been developed by an API task force comprised of representatives of owner companies and contracting firms involved in both upstream and downstream operations. After careful review and input, CMA elected to cosponsor this publication, fully supports its contents, and adopts it as a manager's guide. Application of any section of this publication should be the result of a management decision that takes into account the type of work, the level of risk, and the expected safety performance.

SECTION 2—OWNER ACTION TO IMPROVE CONTRACTOR SAFETY PERFORMANCE

2.1 General

Owners contribute to improved contractor safety performance through actions that may include the following:

a. Making a deliberate management decision to establish an effective ongoing program that uses specific safety performance criteria for selecting contractors.
b. Including specific safety language in contracts between owners and contractors.
c. Conducting meetings before bid submission to address specific contractor safety requirements.
d. Including site-specific safety and health requirements in contractor bid packages.
e. Requesting safety and health information from each prospective contractor and evaluating it during the selection process.
f. Establishing specific training requirements for contractors.
g. Conducting prejob meetings that specifically address safety expectations.
h. Requiring formal contractor safety orientations.
i. Reviewing the safety and health performance of contractors working on the owner's sites, with the expectation of continuous improvement.
j. Maintaining on-site copies of Occupational Safety and Health Administration (OSHA) injury and illness statistics

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or, when OSHA statistics are not applicable, other measures of safety performance for all contractors at each location.
k. Using safety performance information to evaluate contractors.

2.2 Owner Commitment to Improved Contractor Safety Performance

Common to all successful contractor safety programs are the owners' commitment to and continued support of the programs. The owners' commitment and support are essential in minimizing incidents and preventing injuries and illnesses. Effective contractor safety programs require the owners to focus resources on safety and to review how contractor safety is being addressed. To emphasize their commitment, many owners incorporate the need for contractor safety in senior management policy statements on safety, health, fire, and the environment.

2.3 Contract Safety Language

Although standard safety language (for example, "the contractor must comply with all federal, state, and local safety regulations") may be included in a contract, additional safety language may be necessary to clearly convey the owner's expectations. To minimize the need to modify the owner's existing contract language, a specific safety addendum can be developed and attached to the contract when more detailed safety requirements must be addressed for a particular project or work activity. Appendix A provides examples of contract safety language and a safety addendum.

2.4 Contractor Bid Package and Prebid Safety Meeting

An owner can inform a contractor of its safety expectations by clearly outlining its safety performance requirements in its bid package. Such a prebid package should define the safety standards the contractor is expected to meet. Bid packages and subsequent safety meetings may not be practical for certain projects, such as short-term, non-process-related projects. The owner may require the contractor's program to meet safety standards that are at least equal to the owner's. The owner should request specific safety information from the contractor that can be used as part of the selection process, and for the proposal to be complete, it is critical that the contractor provide this information in a clear manner. (A prebid meeting may be useful to reinforce this point.) In addition, the contractor should be informed of the selection criteria and, where appropriate, that the lowest bid will not necessarily be selected. Appendix B provides an example of the type of information that may be requested in a prebid package or during a prebid meeting.

2.5 Including Site-Specific Safety and Health Requirements in the Bid Package

Safety procedures vary among companies and job sites and may have a significant impact on a contractor's proposal and subsequent work. Therefore, even though the contract language and prebid package include the requirement to follow all rules and regulations, it is important that before the contract is awarded, each bidder be made aware of the specific job-site safety rules that will apply. Safety and health requirements for the contractor should be consistent with the requirements established by the owner for its employees.

2.6 Selecting a Contractor

The selection of a qualified contractor is a major step toward obtaining safe contractor performance. An owner can evaluate a contractor's safety program by using the safety information furnished by the contractor in response to the prebid request. The following points may indicate the quality of a contractor's safety performance:

a. The contractor's commitment to safety, as demonstrated by an ongoing safety program that is supported by its top management.
b. The completeness of the contractor's safety programs and their appropriateness for the work site and the safety standards of the owner.
c. The contractor's response to prebid safety requests (see Appendix B), which may include the following:
  1. Injury and illness incidence rates (see Appendixes C and D).
  2. Experience modification rates, if applicable (see Appendix E).
  3. The contractor's safety staffing plan. The plan describes the on-site person or persons appointed by the contractor and subcontractor who will be responsible for safety. It also describes their expertise and authority.
  4. A description of the safety orientation program to be provided by the contractor to all contractor employees on site.
  5. The contractor's enforcement and disciplinary action program regarding safety violations.
  6. The contractor's policy and programs regarding alcohol, controlled substances, and firearms.
  7. A list of safety equipment that will be provided by the contractor.
  8. A narrative from the contractor's viewpoint that identifies the significant hazards of the job and a listing of the steps that will be taken to eliminate or minimize the potential for accidents.
  9. A description of the contractor's programs to comply with applicable regulatory requirements (for example,

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OSHA, U.S. Department of Transportation, Minerals Management Service, state governments).
10. A description of the contractor's employee training program.

As part of the commitment described in Section 1, an owner's management must make it clear that high-quality safety programs and high safety performance will be key elements in the selection and post-work evaluation of any contractor.

2.7 Site Training Requirements for Contractors

The information submitted by a contractor in response to an owner's prebid request (see Appendix B, Item n) should describe the specific training objectives the contractor intends to accomplish before and during the project. This information should allow the owner to review for the first time the training priorities of the contractor. Subsequent discussions can then be initiated that will further define and assign responsibility for specific training that the owner or contractor may need to provide.

2.8 Prejob Safety Meeting

After the contract has been awarded, a prejob safety meeting should be held between the contractor and the owner. The owner's representatives should discuss the specific safety requirements of the project with the contractor's representatives who will be directly responsible for the planned work. This discussion is important because the contractor's representatives who attend the meeting may not be the same individuals who prepared the bid or attended the prebid meeting.

2.9 Safety Orientation of the Contractor's Work Force

Before work is started, the owner should identify and present to the contractor's management important safety rules required by the owner for working on company property. All or part of this information may be used in the safety orientation by the owner or the contractor. This information is typically communicated through one or more of the following: written material, a safety handbook, a videotape, and verbal instructions. Appendix F provides a list of items that are typically included in a contractor safety orientation.

2.10 Reviewing Contractors' Safety Performance

The owner should periodically review its job site to verify that contractors performing work on site have effective safety programs that address the applicable safety and health regulations and comply with the safety provisions in the contract. Conducting periodic reviews of the job site jointly with the contractors' supervisory personnel is an effective way to assess the contractors' compliance with the contract. Using an evaluation checklist like the one shown in Appendix G can assist in the review effort.

2.11 Maintaining Safety Statistics for Contractor Performance

The owner's awareness of contractor safety performance, by means of job-site injury and illness statistics, provides two immediate benefits:

a. Incidence rates can be calculated in accordance with the recommendations given in Appendixes C and D. These incidence rates can be used to measure the effectiveness of contractors' accident prevention programs.
b. Demonstrating that the owner is interested in safety performance throughout the duration of the project emphasizes to contractors that satisfactory performance extends far beyond prebid and prejob submittals and discussions.

As a minimum, the owner should request photocopies of all job-site OSHA Form 200 logs or, when OSHA statistics are not applicable, other measures of safety performance; the corresponding man-hours worked; and a copy of the accident investigation report for each on-site OSHA-recordable case experienced by the contractor and its subcontractors while carrying out the contract.

2.12 Safety Performance and Evaluation

Each completed contractor project should be reviewed not only for the quality of the work, adherence to the schedule, and cost but also for the effectiveness of the contractor's safety program. This overall assessment may be used by the owner in its future bid lists. Contractors that have demonstrated a higher sustained level of safety performance and have achieved the safety goals established by the owner should be considered for inclusion in these lists. Contractors should be aware that they will be held accountable for good safety performance.

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SECTION 3—CONTRACTOR ACTION TO IMPROVE SAFETY PERFORMANCE

3.1 General

Although an owner's expectations can affect the contractor's safety performance, the commitment of the contractor's management to safety is critical because each contractor is in the best position to know how to attain improved safety performance. The actions described in 3.2 through 3.8 support the attainment of this principle.

3.2 Compliance With the Owner's Safety Expectations

The contractor's ability to meet or exceed the safety expectations of owners has grown in importance in recent years. The recommendations given in Section 2 will help the contractor to meet owner expectations and identify steps that can be taken to improve safety performance.

3.3 Accident Investigation and Prevention

Occupational injuries, illnesses, and incidents should be immediately reported to the owner; their cause should be identified; and actions should be taken to prevent their recurrence. The contractor should investigate and document accidents, injuries, illnesses, and near misses. To prevent accidents, the contractor is expected to report any workplace hazards, irrespective of their cause, to the owner.

3.4 Safety Inspections

Performing safety inspections of ongoing work is important to program success. Although the owner may conduct periodic surveys of the contractor's work, frequent and thorough safety inspections performed by the contractor are necessary.

3.5 Safety Training

The owner expects the contractor's personnel to be knowledgeable about their assigned duties. This includes all applicable requirements for safety, health, and fire prevention associated with the performance of their work. As evidence that its personnel have been trained to perform their assigned duties, the contractor should provide documentation of its employee training. The documentation should include the names of those trained, the course content, the date the course was held, and the names of the instructors.

Note: It is understood that the contractor will review with the owner site-specific safety, health, fire protection, and emergency information.

3.6 Medical Care

Proper treatment of occupational injuries can often improve recovery rates and reduce the time away from the job. Contractors involved in large projects that require greater medical response capability than basic first-aid training should consider using a nurse, paramedic, or physician with "occupational medicine" experience. Familiarizing the medical support staff with the project, the type of work that will take place, and the hazards that are anticipated may also improve medical care.

3.7 Emergency Response Plans

Proper attention by the contractor and owner to the development of emergency response plans increases the probability that the desired response will take place. Periodic drills should be conducted to practice and improve the plans.

3.8 Incentive Programs

Motivational programs, such as awards for a contractor employee or employees who achieve specified safety goals, may improve safety performance when properly implemented. Specified goals may, for example, focus on days worked without time lost due to injury, the development of safety slogans, or the identification of hazards.

SECTION 4—EFFECTIVE SAFETY AND HEALTH COMMUNICATION

Ongoing safety and health discussions between the owner and the contractor are necessary if the contractor safety program is to be effective. Special safety and health conditions may arise that might not have been discussed or identified during the prebid and prejob safety discussions, the subsequent safety meetings, the safety manuals, or the written safety rules, and these conditions should be anticipated as the work progresses. Therefore, open communication must be maintained between the owner and the contractor, as well as the contractor's work force. No limitations should be placed on the identification and discussion of any safety and health issues. The identification and discussion of relevant safety and health issues should be emphasized throughout the performance of the contract.

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APPENDIX A—CONTRACT SAFETY LANGUAGE AND CONTRACT ADDENDUM

A.1 Examples of Contract Safety Language

A.1.1 EXAMPLE 1

"The contractor shall comply with all federal, state, and local government laws and regulations—and owner job-site rules—for safety, health, and fire protection."

A.1.2 EXAMPLE 2

"It shall be the contractor's responsibility to become fully acquainted with applicable safety and health laws and regulations prior to commencing work."

A.1.3 EXAMPLE 3

"The contractor and any subcontractor or agent shall inform the owner of any notices, warnings, or asserted violations issued by any government agencies relative to the contracted work. In addition, the contractor shall immediately report governmental inspections, and the results of the inspections, to the owner's representative. Where advance notice is given of an inspection, the contractor shall report it to the owner's representative upon the arrival of the inspector or inspectors."

A.1.4 EXAMPLE 4

"The contractor shall take all necessary precautions to keep the work site free from recognized hazards that are likely to cause injury, death, illness, or damage to property."

A.1.5 EXAMPLE 5

"The contractor will adhere to all legally mandated and generally accepted practices of safety and workmanship and to site safety standards or job work rules to avoid injury to workers and others and damage to equipment, materials, and property."

A.1.6 EXAMPLE 6

"The owner may suspend work at any time or terminate the contract for a pattern of frequent failure to adhere to safety laws and regulations or the owner's established on-site safety procedures."

A.1.7 EXAMPLE 7

"The owner may deny access to the site by the contractor and its employees if, in the owner's sole judgement, such action is justified on the basis of safety."

A.1.8 EXAMPLE 8

"The contractor will allow the owner to enter the work site to audit for compliance with the terms of this contract, including all addenda."

A.1.9 EXAMPLE 9

"The contractor agrees to maintain current records covering safety and health training for employees working on this project for the duration of this contract and agrees to make these records available to the owner for review, at the owner's request."

A.2 Example of a Contract Addendum: Flare Repair

Note: The following is a hypothetical example and is provided for illustrative purposes only. Actual addenda may vary in details and tasks covered.

"The contractor must adhere to the following safety requirements when performing maintenance on an inactive flare line that is in near proximity to a live flare:

a. To prevent adjacent live flare smoke and by-products of combustion from entering the contractor work area, maintenance activity in the inactive flare pit will only be allowed when the wind is blowing in a NE/N/NW direction.
b. The owner's radiant heat calculations verify that radiant heat will not be significant within the "safe zone," which is 500 feet from the flame center.
c. Contractor personnel shall obey posted signs that restrict their access to the adjacent live flare area. Evidence of training in this area shall be documented and presented to the owner's safety representative on site.
d. Whenever possible, material will be prefabricated outside the flare pit to further minimize exposure.
e. A contractor employee shall be assigned to monitor the wind condition at all times. This person shall have radio communication with the owner's operations department and shall be capable of initiating an evacuation when necessary.
f. Escape routes will be preplanned, the contractor's employees will be trained on the escape routes, and training will be documented.
g. No synthetic clothing will be allowed in the inactive flare repair area.
h. The contractor will provide first-aid capabilities, including water-gel-type fire blankets.
i. A full-time safety person shall be assigned to the project and will be on site whenever work activities must take place in the inactive flare repair area.
j. Based on the uniqueness of this project, the owner requires all contractors to attend a 15-minute safety briefing at the start and end of each shift."

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APPENDIX B—BID PACKAGE: REQUEST FOR INFORMATION

As part of the contractor's proposal and bid, the following safety-related information may be requested from the contractor by the owner:

a. A written safety policy endorsed by the contractor's top management.

b. The contractor's safety manual.

c. The contractor's staffing plan for safety program implementation.

d. The contractor's number of OSHA-recordable cases, lost workday cases with days away from work, lost workdays and restricted work cases, and days lost, along with man-hours worked for the current and previous 3 years, as described in Appendix C. Fatalities should be listed separately, with detailed explanations provided.

e. The contractor's experience modification rate, if applicable, for the previous 3 years (see Appendix E).

f. A description of the initial employee safety orientation program proposed by the contractor.

g. A disciplinary action procedure that addresses safety-related infractions.

h. A list of the types of safety equipment that the contractor anticipates will be used, including personal protective equipment (PPE) and equipment that the owner may be requested to supply.

i. A narrative that identifies what the contractor perceives to be the significant hazards of the work to be performed and the contractor's plan to eliminate or minimize the potential for an incident that could result in an occupational injury or illness.

j. A description of the contractor's hearing conservation program if noise levels are expected to exceed 85 dB(A).

k. A description of how the contractor's on-site job manager and supervisors are held accountable for safety performance and how performance is monitored, assessed, and communicated to them.

l. A description of the contractor's accident investigation procedures and the types of incidents that are investigated. Copies of the accident investigation forms to be used should be included.

m. A description of the manner in which safety inspections will be performed, a list of who will perform them, and the proposed frequency of the inspections.

n. A description of the types of safety, health, and fire training the contractor's work force has received or will receive.

o. A description of how often safety meetings are conducted, who presents and attends the meetings, and how the topics are selected.

p. A description of the safety incentive program (if the contractor anticipates that one will be used).

q. A description of the contractor's policies and programs relating to alcohol, controlled substances, and firearms.

r. A description of how the contractor's safety programs apply to subcontractors and of the method by which successful implementation of and compliance with the programs will be assured.

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APPENDIX C—SAFETY EVALUATION: INJURY AND ILLNESS RATES

OSHA requires all onshore employers with 10 or more employees to record injury and illness information on OSHA Form 200, "Log and Summary of Occupational Injuries and Illnesses." The employer must retain completed forms for 5 years. Data on the following items are readily available from a contractor's completed OSHA Form 200 log:

a. Fatalities.
b. Injuries and illnesses with lost workdays, including days away from work and restricted activity cases.
c. Injuries and illnesses involving days away from work.
d. Injuries and illnesses without lost workdays.
e. Days away from work.
f. Days of restricted work activity.

If the contractor knows the total number of employee-hours worked during the year, the contractor can easily compute incidence rates related to a common exposure base of 100 full-time workers for any of the items above by using the following formula:

$$\text{Incidence rate} = (N / H_B)(200{,}000)$$

Where:

N = number of injuries and/or illnesses or lost workdays.
H_B = total hours worked by all employees during a year (If the hours are unknown, 173.3 hours per employee-month should be used).
200,000 = base for 100 full-time-equivalent workers (working 40 hours per week, 50 weeks per year).

The following data may be particularly useful:

a. Number of fatalities.
b. Incidence rate for cases involving days away from work.
c. Incidence rate for total OSHA-recordable cases.
d. Incidence rate for number of days away from work.

The owner should obtain data on OSHA incidence rates from prospective contractors as a measure of safety performance. This recommendation may not apply to incidental contractors that generally do not affect facility safety, such as those that provide janitorial, laundry, and delivery services.

The owner should ask the contractor to provide data for the past 3 years for the firm as a whole and for the division that will perform the work. The owner should develop a comparative overview of OSHA injury and illness incidence rates or, when OSHA statistics are not applicable, other measures of safety performance for prospective contractors. The contractor should use *Recordkeeping Guidelines for Occupational Injuries and Illnesses* (the most recent edition approved by the U.S. Department of Labor or an OSHA-approved substitute).[1]

Using these data, the owner can determine the trend in the contractor's safety performance and compare the performance with that of others bidding on the same work and with industry averages published annually by the Bureau of Labor Statistics. These data can be requested in a questionnaire similar to that given in Appendix D.

[1]*Recordkeeping Guidelines for Occupational Injuries and Illnesses*, Bureau of Labor Statistics, U.S. Department of Labor, Washington, D.C., September 1986.

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APPENDIX D—CONTRACTOR INJURY AND ILLNESS PERFORMANCE REPORT

(The following questionnaire should be used to collect actual injury and illness performance data for work being performed on the owner's site.)

Provide your actual injury and illness data, as developed from your injury and illness safety statistics for the time period specified below. When applicable, data from OSHA Form 200 logs should be used.

Contractor's name: ______________________

Time period for data (give dates): / / to / /

Job location and identification: ______________________

Total hours worked during period: ______________________

Item	Number	Incidence Rate (see below)
Fatalities	________	
Cases involving lost workdays[a]	________	________
Cases with days away from work	________	________
Total OSHA-recordable cases	________	________
Number of days away from work	________	________

[a]Includes days away from work and restricted activity cases.

If you know the total number of employee-hours worked during the year, you can easily compute incidence rates related to a common exposure base of 100 full-time workers for any of the items above by using the following formula:

$$\text{Incidence rate} = (N / H_E)(200{,}000)$$

Where:

N = number of injuries and/or illnesses or lost workdays.
H_E = total hours worked by all employees during a year (If the hours are unknown, 173.3 hours per employee-month should be used).
200,000 = base for 100 full-time-equivalent workers (working 40 hours per week, 50 weeks per year).

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APPENDIX E—WORKERS' COMPENSATION EXPERIENCE MODIFICATION RATES

Workers' compensation experience modification rates (EMRs) are used by the U.S. insurance industry to determine premiums for workers' compensation insurance. An EMR less than 1 indicates above-average injury and illness performance, and an EMR greater than 1 indicates below-average performance. An owner can get an indication of a contractor's past safety performance by reviewing the contractor's EMR. A comparison of the EMRs of contractors bidding on a project may improve the selection process.

It is important to note, however, that EMRs are not applicable to all work locations and that there are three types of EMRs, none directly comparable with any of the others. Because of this and the fact that some contractors self-insure, the use of EMRs may not always be appropriate.

The following states do not allow commercial workers' compensation insurance and do not participate in the National Council on Compensation Insurance (NCCI) rating program:

Nevada
North Dakota
Ohio
Washington
West Virginia
Wyoming

Another group of states allows commercial insurance, but each state's rating bureau develops its own set of experience modification factors:

California
Delaware
Michigan
New Jersey
Pennsylvania

All other states participate in the National Council on Compensation Insurance's interstate experience system; however, the rating bureaus in the following states develop their own experience modifiers for employers who only employ people within their respective states:

Hawaii
Indiana
Massachusetts
Minnesota
New York
North Carolina
Texas
Wisconsin

EMR data can be solicited as follows: "List your firm's (or division's) experience modification rate for the three most recent years." "The Workers' Compensation Crisis: Safety Excellence Will Make a Difference" provides a more complete discussion of EMRs.[2]

[2]"The Worker's Compensation Crisis: Safety Excellence Will Make a Difference," Business Roundtable, New York, January 1991.

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APPENDIX F—CONTRACTOR SAFETY ORIENTATION

The following topics should be considered as part of a contractor safety orientation. The choice of topics for an orientation is based on the type of work to take place and the duration of the project.

a. Emergency response plan. The plan contains procedures that are to be followed if a serious occupational injury or illness, a fatality, a structural failure, a fire, an environmental release, or any other emergency occurs.

b. Work authorization system. This system is the owner's written procedures for work permits and authorization for such activities as hot work, excavation, entry to confined spaces, and control of hazardous energy sources.

c. Incident notification. OSHA-recordable injuries and illnesses, accidents, and damage or significant changes to process equipment need to be reported to the owner.

d. Accident investigation. Accident investigation reports need to be completed and given to the owner promptly, as specified in the contract. Depending on the owner's preference, accident investigations may include the following:

1. Cases of lost workdays.
2. Cases with restricted activity.
3. OSHA-recordable cases.
4. Near misses.
5. Damage to company property or third parties.

e. Contractor safety training. The owner requires the contractor to provide safety and health training for certain areas. The contractor should identify these in writing and present them to the owner before the job is started. Documentation of completed training is considered mandatory and should be available to the owner upon request. Examples of contractor training topics include the following:

1. Hazard communication.
2. Personal protective equipment.
3. First aid and cardiopulmonary resuscitation.
4. Fire prevention and protection.
5. Forklift and crane operations.
6. Hot work and welding.
7. Entry to confined spaces.
8. Walk and work surfaces.
9. Abrasive blasting.
10. Housekeeping.
11. Asbestos removal.
12. Work permits.
13. Respiratory protection.
14. Scaffolding requirements.
15. Control of hazardous energy sources.
16. Warning signs, signals, and barricades.
17. Excavating, trenching, and shoring.
18. Emergency evacuation and emergency medical assistance.
19. Naturally occurring radioactive material.
20. Hazardous waste operations and emergency response plan.
21. Reporting and correcting hazards.
22. Periodic, documented safety inspections.
23. Hazards of substance abuse.
24. Fall protection.

f. Policy on alcohol, controlled substances, and firearms. This policy includes testing, search, and disciplinary provisions that are required by the owner and contractor.

g. Correction of safety hazards. Instructions should be communicated about corrective action for any safety hazards that may arise. Specific instructions on the need for immediate correction of imminent hazards should also be provided.

h. Effects of poor job safety. Poor safety performance on site by the contractor can result in personal injury, property damage, and delays and have an impact on the contractor's ability to secure work from the owner. The owner should ensure that contract employees are aware of the importance of complying with the provisions of the contract and all applicable safety, health, and fire rules.

i. Attendance at safety meetings. How contractor safety meetings are conducted and how often they are held should be discussed; mandatory attendance should be emphasized.

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APPENDIX G—CONTRACTOR SAFETY PROGRAM CHECKLIST

The checklist provided in this appendix can assist an owner in evaluating the effectiveness of contractor safety programs. The following is an example of such a checklist. Some of the questions in the checklist may not apply to all worksites; likewise, additional questions may be necessary.

No.	Item	Yes	No	Not Applicable
	Training			
1	Does the contractor ensure that all of its personnel are competent to perform the work required?			
2	Does the contractor ensure that its newly assigned workers are directly supervised by a competent worker?			
3	Does the contractor ensure that jobs requiring certification are performed by workers who possess the appropriate documentation and certificates?			
4	Does the contractor provide training for its managers and supervisors to ensure that they are capable of administering the safety program?			
5	Is there a training plan for contractor employees?			
6	Does the training plan address—			
	Safety and health?			
	Material safety data sheets and hazard communication program?			
	Safety orientation?			
	First aid and cardiopulmonary resuscitation?			
	Fire fighting?			
	Firewatch?			
	Hydrogen sulfide?			
	Transportation of hazardous materials?			
	Fall protection?			
	Drug and alcohol policy?			
	Forklift and crane operations?			
	Housekeeping?			
	Entry into confined spaces and requirements for standby personnel?			
	Permit systems?			
	Abrasive blasting and hydroblasting?			
	Respiratory protection?			
	Use of personal protective equipment?			

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No.	Item	Yes	No	Not Applicable
6	Does the training plan address (continued)—			
	Control of hazardous energy sources?			
	Excavating, shoring, and trenching?			
	Emergency response plan?			
7	Is there documentation on file to verify that the training has been completed?			
8	Does the documentation include employees' names, course dates, instructors' names, the length of the courses, and outlines or descriptions of the course content?			
9	Does the contractor require retraining or refresher training?			
10	Does the contractor expect the facility owner to provide assistance with the training?			
	Incident Investigation and Analysis			
11	Are all incidents investigated to determine their cause, and is corrective action taken?			
12	Are serious incidents and near misses reported to the owner immediately?			
13	Does the contractor have a written incident investigation procedure?			
14	Is a report completed for—			
	Fatalities?			
	OSHA-recordable accidents?			
	Vehicle accidents?			
	Equipment damage?			
	Spills?			
	Fires?			
	Near misses?			
	Contractor injury resulting from owner action or equipment?			
15	After an incident, are required reports submitted to the owner within 48 hours?			
16	Does a safety committee assist in the investigation and follow-up?			
17	Do the contractor's supervisors or managers ensure that as a result of the investigation, corrective action is taken?			
18	Does the contractor develop a monthly statistical summary that illustrates its safety performance?			
19	Does the owner receive a copy of this summary and photocopies of the OSHA Form 200 logs?			
	Safety Responsibility			
20	Has the contractor assigned a competent person as the safety representative?			
21	Does the safety representative have sufficient authority to implement change?			

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No.	Item	Yes	No	Not Applicable
	Safety Responsibility (continued)			
22	Is the contractor's management aware of its role in an effective safety program?			
23	Are the contractor's employees aware of their roles in an effective safety program?			
24	Does the contractor have a disciplinary action program that includes safety and health issues, and is the program enforced?			
25	Does the contractor have a safety policy statement endorsed by its top management?			
	Safety Reviews			
26	Does the contractor conduct ongoing safety inspections?			
27	Does the contractor have a hazard identification program that allows employees to report unsafe acts or conditions?			
28	Are inspection records kept on file, and are they available for review by the owner?			
29	Are concerns reviewed, and are corrective actions taken?			
30	Is there written evidence that concerns have been reviewed and corrective actions have been taken?			
31	Is there a system to notify the owner of safety and health problems that are not created by the contractor but that could impact personnel at the site?			
	Emergency Response			
32	Are the contractor's employees aware of their role in an emergency?			
33	Have exit routes and meeting areas where head counts are to be performed been established?			
34	Do all employees receive emergency response training?			
35	Does the contractor know how to report an emergency?			
36	Have instructions been given to check wind conditions in the event of a fire or gas release and to evacuate upwind or crosswind?			
37	Are emergency telephone numbers posted throughout the site?			
38	Have the contractor's employees received specific instructions about vehicle use during and after an emergency?			
39	Is the contractor involved in facility drills?			
	Job Analysis and Observation			
40	Are all critical jobs identified and analyzed?			
41	Are the procedures for critical jobs written and reviewed with the contract employees before the work begins?			
42	Are job observations, such as job safety analyses (JSAs), conducted?			
	Permit Systems			
43	Does the contractor ensure that all work permit systems are followed?			

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No.	Item	Yes	No	Not Applicable
	Permit Systems (continued)			
44	Does the contractor conduct audits to verify that all work permit systems are followed, and is disciplinary action implemented in the event of noncompliance?			
45	Is there a method that allows the contractor to provide the owner with feedback about the effectiveness of the permit system and the impact of the process on the performance of the work and on the contract?			
	First Aid and Medical Care			
46	Does the contractor have personnel trained to administer first aid and cardiopulmonary resuscitation?			
47	Are adequate first aid supplies available on site?			
48	Have the first aid kits been approved by a physician?			
49	Have arrangements been made with the owner, ambulance service, hospital, or others to handle medical care ranging from first aid to life-threatening injuries and illnesses?			
50	Does the contractor utilize a "physician under standing orders"?			
51	Does the contractor distribute prescription medications?			
	Personal Protective Equipment			
52	Are specific rules developed and communicated concerning the proper use of personal protective equipment?			
53	Is the necessary personal protective equipment available on site?			
54	Has a maintenance program been established to assure that personal protective equipment is maintained in satisfactory condition?			
55	Is the use of personal protective equipment enforced by the contractor's management?			
	Communications and Meetings			
56	Before a job begins, does the contractor hold a meeting to address safety issues?			
57	Do the contractor's supervisors mention safety as part of every work assignment?			
58	Are tailgate meetings held? If they are, how long do they last, how often are they held, and how effective are they?			
59	Are the topics discussed during the meetings, names of those who attended, dates, and any comments or concerns documented?			
60	Are problems identified during the tailgate meetings acted on by the contractor's management?			
61	Does the contractor make use of safety committees?			
62	Does the contractor's management actively demonstrate support for improved safety programs?			

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No.	Item	Yes	No	Not Applicable
	Communications and Meetings (continued)			
63	Does the contractor's management hold periodic meetings with the owner's management specifically to discuss safety, health, and job performance?			
64	Are the contractor's employees able to communicate all safety and health problems to their management?			
65	Is a meeting held with the contractor at the end of the project to review safety performance?			
	Incentive Programs			
66	Does the contractor make use of incentive award programs?			
67	Are the contractor's incentive programs effective in reducing occupational injuries and illnesses?			
68	Does the owner offer incentive programs to the contractor's management that are based on the overall successful completion of the contract?			

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