

**Advisory Committee on Construction Safety and Health
I2P2 (Illness and Injury Prevention Program) Workgroup Meeting
May 9, 2012**

The meeting was called to order by workgroup co-chairs, Tish Davis, Gary Batykefer and Tom Marrero. There were 37 attendees. (See attached.)

Jim Maddux reported that the I2P2 proposed rule is in the SBRFA process and that OSHA is working on providing some additional information for this review. He gave an overview of the Workgroup meeting and highlighted the VPP process.

Following this overview, Tish gave a brief recap of the previous workgroup minutes and the presentation by the Building and Construction Trades Department given at that meeting.

Next was a presentation David Kliwinski, of Jacobs Construction. He began by emphasizing that relationship building and trust on multi-employer sites is key. He described Jacob's 5 step program for Construction Safety Management:

- 1) Subcontractor selection. They place heavy emphasis on subcontractor pre-qualifications. They review OSHA history, obtain references for subs from former clients, and use a tool call Jacobs Injury Performance Standards. They bring together corporate entities to review what they-referred to as "Attachment A" describing safety and health requirements. Their aim is to create a common safety culture within their contractor/subcontractor environment.
- 2) Contract preparation. Bid documents must set out clear safety expectations between contractor and subs. Each contract must include earmarked resources for establishing a safety program on site and identify key safety personnel.
- 3) Contract award. Key individuals attend an initial kick off meeting to get buy- in and ownership of the safety program by all involved.
- 4) Orientation and training. Orientation is a key element as first impressions are critical. Policies and procedures are conveyed to the subs. They have a "Beyond 0" training program. Hands-on training, mentoring and coaching are seen as crucial in developing a safety culture between employees and subs.
- 5) Managing the work. Site leadership teams review quality measures, and assess site safety using attachment A. They also have Beyond *O* safety committees that include workers and management, with heavy involvement of workers Safety committees meet monthly. Safety personnel do job site assessments on a weekly basis with a focus on tasks and potential hazards up to three weeks ahead. They also use white boards on site to list activities of work in progress; crews can enter hazards/safety information on white board and they get recognized for exemplary entries. Jacobs also uses incident investigations to create safety alerts that are shared company wide. They have a claims management classification program. They also have a process for senior staff review to determine construction readiness prior to beginning new work.

During Q and A we learned that:

- Foremen/supervisors are required to have OSHA 10 and First Aid training;
- Workers have stop work authority based on safety concerns and in some sites have stop work cards.
- Jacobs requires all subs to have health and safety management programs and smaller subs can adopt the Jacob program if they don't have programs of their own.

In response to a question about how they work in other countries that have requirements for I2P2 programs, David responded that there can be challenges but melding program requirements is not too burdensome. David also reiterated their emphasis on pre-qualifications. Jacobs look at safety performance over the last three years comparing contractor/subcontractor injury rates with the national averages for the relevant NAICS codes. Jacobs does not rely primarily on the Experience Modification Rates (EMR).

The next presentation was by Tom Boutwell of Cupertino Electric, a California based company and NECA contractor. They have a written 10 point IIPP program goes beyond Cal OSHA requirements, and code of safety practices. A pocket size version is provided to all on site for use. All subcontractors and employees get copies. Prior to starting a job, they meet with the General Contractor to review the site safety plan. They have daily safety pre-task planning, signed off by workers. Unsafe conditions are mitigated on observation. On small 1-2 man jobs, hazards are logged in daily.

In response to a question about whether CalOSHA looks at more than the paper program, he responded that Cal OSHA definitely goes beyond review of written program, and conducts site inspections to verify program implementation. When asked if he believes the IIPP works, his response was yes it does produce results, but can be more challenging on smaller jobs. They do address ergonomic issues in their program through rotation and task assessment. They do require all subs, to have IIPPrograms, even in states that do not require it.

General discussion

In response to questions about incentive programs, both reported that they do not have formal incentive programs focused on injury rates but do recognize safe work practices and exemplary safety behavior. David did underscore that discipline is an important part of a program.

In response to a question about record-keeping, both reported that the subs keep their own OSHA logs, but provide written reports of injuries to the upper tier contractors. Both companies maintain databases of all reports received.

Plans for next meeting

OSHA could not report on a definitive timeline for the SBRFA process to be completed. There was a strong feeling that the workgroup should continue. It was agreed that we get input from smaller contractors at the next meeting to learn about their experiences and any concerns they have about mandatory I2P2 requirements.

The meeting adjourned at 10:06 a.m.