PARTNERSHIP
An OSHA Cooperative Program

St. Croix Health

OSHA STRATEGIC PARTNERSHIP

Between

Occupational Safety and Health Administration

Eau Claire Area Office

OSHA
Occupational Safety
And Health Administration

Wisconsin Safety and Health Consultation Program

WisCon

And

Market and Johnson, Inc.

Market & Johnson
Adding Value to Everything We Do

I. IDENTIFICATION OF PARTNERS

The Eau Claire Area Office of the Occupational Safety and Health Administration (OSHA), Wisconsin Safety and Health Consultation Program (WisCon)and Market & Johnson, Inc. (M&J) recognize the importance of providing a safe and healthful work environment for workers engaged in the construction industry. This OSHA Strategic Partnership Agreement (hereafter referred to as "OSP" or "the partnership") at the St. Croix Health, will facilitate the goals of OSHA to reduce occupational-related fatalities and serious injuries within the construction industry.

M&J provides construction services to the following markets: healthcare, commercial, office/retail, hospitality/entertainment, educational, religious, governmental, community, environmental, electrical, food processing, and general industrial. M&J and their subcontractors will be considered Partners. The activity level required to complete this project on schedule will call for complete compliance and cooperation efforts by all parties to ensure this project always has a safe and healthy work environment.

The groups listed below have developed this OSHA Partnership Agreement jointly with a common objective to provide a safe and healthy environmental for all at the St. Croix Health project. It is the intent of this agreement to focus their combined expertise and knowledge to promote and encourage all workers on site to do their part in doing the same.

- Occupational Safety and Health Administration (OSHA - Eau Claire Area Office)
- Wisconsin Safety and Health Consultation Program (WisCon)
- Market & Johnson, Inc. (M&J)

All contractors and subcontractors working at this site agree to participate in the partnership agreement. (All participating subcontractors will be listed after project is bid).

The following Labor Unions are participants in this partnership agreement hereinafter, collectively, "Labor Unions": Additional Labor Unions will be added as the project continues to bid work packages.

Laborers Local 268

Cement Masons 599
Bricklayers/Cement Finishers Local 19

II. PURPOSE/SCOPE

This Partnership was developed jointly by the Occupational Safety and Health Administration (OSHA), Wisconsin Safety and Health Consultation Program (WisCon) and Market & Johnson, Inc. This Partnership was implemented to collaborate with employers and employees to address all the hazards, especially the most commonly known such as excavation and trenching during construction at the St. Croix Health work-site, in an attempt to reduce injuries, illnesses and fatalities through the long – term development of effective Safety and Health Management Systems. For all trades to

recognize safety as an element of responsibility for all employees to have the mind set is essential to our success.

The St. Croix Health will be located south of Hwy 8 in St. Croix County, Wisconsin. The Complex consists of the construction of a new, full-service hospital and outpatient clinic campus located south of Hwy 8 in St. Croix County, Wisconsin. The project includes extensive site development with grading, stormwater management, utilities, parking, and landscaped areas, supporting a large single-story healthcare facility with a penthouse level for mechanical and building support systems.

The building program encompasses a comprehensive range of medical services, including emergency department, diagnostic imaging (CT, MRI, X-ray, nuclear medicine), surgery and sterile processing, outpatient clinic and infusion spaces, laboratory and pharmacy, inpatient med/surg and observation units, LDRP and postpartum care, inpatient rehabilitation, administrative and staff support areas, dietary services, and central facilities and logistics areas.

Structurally, the facility utilizes steel framing with concrete foundations and slabs, rooftop mechanical units, and canopies, while the exterior envelope features a combination of brick veneer, metal panels, wood-look aluminum siding, curtain wall systems, and EPDM/TPO roofing assemblies suitable for a modern healthcare environment.

III. GOALS/STRATEGIES

Goals	Strategies	Measures
1) Maintain a project-wide injury and illness rate of 25% below the 2024 BLS Total Recordable Case (TCIR) rate 1.8 and Days Away from Work, Restricted or Transfer (DART) rate of 1.0 for the construction industry NAICS 2362 as the baseline	a) Require the employers to report all injuries and illnesses, hospitalization or amputation to OSHA within 24 hour of occurrence. b) Require the employer to conduct site walk around safety inspections prior to start of work each day. c) Require the employer to issue proper protective equipment (PPE) to employees for the task to be performed. • Provide cut level four gloves for workers who handle tools or materials that may cause laceration hazards. • Implement tool tethering for employees who work from heights and hard hat protection at all times to minimize struck by hazards.	-OSHA and the employer(s) will analyze the injury & illness data to identify emerging hazards and evaluate the effectiveness of the OSP and refer to Wisconsin Safety and Health consultation program. This goal will be measured by the number of injuries and illnesses reported by the employers and number of hazards identified and abated during the daily walk around inspections and the number of employees receiving proper PPE.
2) Ensure all employers, supervisors, and employees whose job duties require them to be in or around trenching and excavation work receive excavation and trenching training	To ensure they will be able to address identification and correction of hazards, soil testing methods, trench protection systems, and general safety requirements.	-Measure the number of employers that have been provided training materials, and the number of workers who received training.

Goals	Strategies	Measures
3) Increase the number of employees, employers and supervisors who are provided effective safety and health training, such as the OSHA 10-hour and 30 hour course.	a) Evaluate implementation of the employers' safety and health training programs along with existing training documentation of workers. b) Evaluate the employers that provide employees with OSHA 10-hour/ OSHA 30-hour training. c) Implement First Aid /CPR certification training. d) Implement pre-task planning training to improve task level risk assessment quality. e) Implement safe ladder procedures and training to reduce falls. f) Ensure emergency response drills are completed once per quarter. Crisis management drills and/or table top exercises to be completed regularly	-Measure the number of employers with effective safety and health training programs. Document the number of trainings received and their topics -Compare the number of managers, supervisors and employees provided with OSHA 10-hour/ OSHA 30-hour training with the baseline number managers, supervisors and employees that had completed OSHA 10-hour/ OSHA 30-hour training prior to OSP participation. -Track and publicize the number of safety training offerings and trades that have been trained. -Track the number of emergency response drills and table top exercises performed. Lessons learned to be shared with all partners.

Goals	Strategies	Measures
4) Ensure workers and their representatives have meaningful participation and management support in the safety and health program.	a) Encourage workers to report safety and health concerns through: - Increase near miss reporting on the project - Increase communication of job task updates throughout the duration of the project - Implement daily employee "speak up" engagement opportunities to report unsafe conditions or suggestions b) Ensure management reports back to workers routinely and frequently about actions taken in response to concerns and suggestions. - Promote/discuss good work practices to ensure worker input is welcomed. i.e. examples of reporting unsafe conditions, completion of safety forms and appropriate use of PPE where required -Establish proactive measures for the common hazards found at construction sites. -Provide all necessary engineering controls, administrative controls and personal protective equipment.	-Measure the number of near miss incidents reported and root cause analysis completed. -Track the number of pre-task planning and daily pre-shift safety huddles that discuss/reviews safety and health indicators and/or open safety items.

Goals	Strategies	Measures
5) All participating employers implement a safety and health management system	a) Implement safety and health management systems patterned after OSHA's Recommended Practices for Safety and Health Programs in Construction to improve their safety culture and safety performance. b) Participate in OSHA's Safe and Sound Campaign to encourage employers to have a safety and health management system. c) Provide a comprehensive Job Site Safety Orientation for all workers prior to allowing them to work on site. d) Implement a job site wide three levels of risk assessments process	-Track the number of participating employers/contractors that implemented safety and health management systems -Track the number of employers/contractors who attended or participated in Safe + Sound Campaign. -Track the number job hazard analysis -Implement a strategy to track and identify who has completed job site safety orientation such as issuing a hardhat sticker or roster.
6) Ensure employee health and wellness	a) Provide team members participation opportunites in health and wellness related activities, events, or programs.	-Track the number of wellness events/services provided on the project site.

IV. SAFETY AND HEALTH MANAGEMENT SYSTEM

The Safety and Health Management System (SHMS) is a critical part of this partnership agreement in that it is an important aspect of collaboration between the project management team, supervisors, and the workers on site. This SHMS will include, but not be limited to, the following core elements:

Management Leadership Roles

M&J will implement a SHMS patterned after OSHA's "Recommended Practices for Safety and Health Programs in Construction" that will encourage partnering employers to commit a high level of worker involvement to assist in monitoring and identifying jobsite hazards on a continual basis to prevent accidents. Printed copies will be available upon request in the project field office. The SHMS will be implemented at the initiation of the partnership and continue through the duration of the partnership. Recommended Practices for Safety and Health Programs

M&J will use their systems to collect and analyze injury and illness trends (including near-miss incidents) by all contractors performing work at the site. This data will be used as a tool to ensure continual safety and health improvement at the site. The management of this Agreement will be

accomplished by M&J implementing a comprehensive jobsite safety and health management system, which includes:

- The performing contractor - Task Hazard Analysis (THA) and Pre-Task Plan forms, M&J will complete a risk assessment prior to exposing any employee to potential safety and health hazards.

- Working with OSHA, M&J will coordinate with the Wisconsin Safety and Health Consultation Program to provide the resources to conduct initial monitoring for ALL toxins, carcinogens, or hazardous substances currently emphasized by OSHA and which present inhalation hazards, such as silica, lead, cadmium, and/or isocyanates. Employee exposures will be assumed, and respiratory protection worn until the results of the initial monitoring studies are received and demonstrate no exposure problems or prior surveys show no hazard exists. M&J will endeavor to ensure that no work with these materials will occur, thus preventing any exposure. M&J will request periodic evaluation visits by its insurance company's Industrial Hygienist and Wisconsin Safety and Health Consultation Program.

- All contractors on-site will perform daily safety inspections and reports. In addition, once each month, a comprehensive audit of the jobsite will be performed. A representative of the subcontractors will be a safety audit participant in the job site areas where their employees may be exposed to hazards. Any hazards found during the audits will be corrected promptly. Items identified during the audits will be annotated on a daily log. When hazards cannot be corrected immediately, they will be tracked until abatement is completed. Employees exposed to these hazardous conditions will be informed of the hazard and effective interim control measures will be implemented. A record will be kept of all hazards found during the comprehensive site safety audits and the number of hazards corrected because of the weekly audits.

- All contractors must complete Heat Awareness Training before beginning work on site. This training covers recognizing early and advanced symptoms of heat stress and heat illness, understanding when and how to respond, and knowing the importance of water, rest, and shade as the core controls for preventing heat-related incidents. Every contractor is responsible for ensuring their crews stay hydrated, take scheduled cool-down breaks, and use shaded areas whenever heat conditions increase the likelihood of heat related injuries.

- Implement an effective Fall Protection Plan to include fall protection in all cases as required by OSHA 1926 subpart M.

- Ensure employees receive training as follows:

    - All employees will receive a site-specific construction safety orientation covering jobsite safety and health issues, procedures related to the work being performed, as well as the requirements outlined in the Partnership Agreement. In addition, employees shall receive training on the content of the risk assessment for operations they will encounter. This may require periodic retraining of employees on the content of the risk assessment as they become relevant due to entering new phases of

construction. M&J will provide a Job Hazard Assessment form to each subcontractor designated safety representative for completion if needed. Subcontractors must submit an acceptable JHA to M&J a minimum of one week prior to conducting work covered by this assessment.
    - Safety and health training will be provided to all workers in a language they understand. Bilingual instructors will perform this training. M&J will provide a list of instructors to all subcontractors to ensure that all workers are effectively trained.
    - Other hazard-specific training will be conducted on an as-needed basis.
    - Subcontractors can utilize other instructors as long as these instructors can provide a valid certification card showing completion of the OSHA 30-hour course. M&J will have primary responsibility for coordinating this training; however, as resources allow the Wisconsin Safety and Health Consultation Program will also provide assistance. M&J plans to hold 10-hour Safety Training sessions as needed to help train all personnel as the schedule allows.
- Each subcontractor with written safety and health management systems must submit them to M&J. Companies without safety and health management systems may adopt M&Js' Incident Prevention Plan or develop an adequate safety and health management system with the assistance of Wisconsin Safety and Health Consultation Program.
- Ensure M&J and/or the affected subcontractors adequately address health-related issues, which arise during the course of the Project, with the assistance of OSHA and Wisconsin Safety and Health Consultation Program as resources permit; all health-related issues will be discussed monthly during the Partnership meetings.
    - An effective Hearing Protection Program, including noise monitoring and engineering controls, where possible, will be implemented by M&J.
    - An effective environmental monitoring program will be implemented by the performing contractor to control airborne hazards, such as silica, and will include personal monitoring, employee training, implementation of engineering controls where possible, and the use of respiratory protection when necessary. Previous site-based data will be considered acceptable.
- Ensure compliance with the NFPA 70E when working on live electrical equipment, including training and the availability and use of personal protective equipment. A permit system will be implemented whenever working in close proximity to or on live electrical systems to ensure the implementation of appropriate protective measures prior to exposure. The permit form includes requirements for pre-task review and lockout/tag out procedures to be followed.
- Ensure all equipment capable of causing amputations is adequately guarded.
- Ensure effective programs are employed, consisting of policies and procedures that comply with OSHA's Process Safety Management (PSM) standards, as equipment and processes are brought live and on-line at the Project.

V. WORKERS INVOLVEMENT

By being a signatory to this OSP all affected unions support this OSP or waive their opportunity to be a signatory; however, indicated their willingness for this OSP to proceed.

The Labor Unions shall be permitted to designate a Safety Representative if they desire. The Safety Representative will be permitted to attend all safety related meetings and onsite walkthroughs with

the employer and OSHA representatives. The Safety Representative can be someone other than the job steward

- The contractor responsible will ensure workers are involved with daily huddle meetings to discuss the activities for the day, potential exposures, and the control measures designed to address project hazards.
- The contractor responsible will ensure workers participate in weekly safety toolbox talk meetings.
- M&J or the contractor responsible requires reporting of any near miss, unsafe conditions, or incident immediately to their supervisors, who must then report to M&J site supervision as soon as possible and no more than (4) hours after learning of the incident.
- M&J or the contractor responsible will provide support to all workers and/or their representatives by providing feedback on risks and assisting them in eliminating hazards.

VI. PERFORMANCE MEASURES

Performance measures as outlined in section III will be used to assess the effectiveness of the partnership. M&J will gather and track data for the performance measures and share the information with OSHA, as specified in Appendix B of the Strategic Partnership Program for Worker Safety and Health, OSHA Directive CSP 03-02-003.

II. ANNUAL EVALUATION

The Partnership will be evaluated on an annual basis with the Strategic Partnership Annual Evaluation Format as specified in Appendix C of OSHA Instruction CSP 03-02-003, OSHA Strategic Partnership Program for Worker Safety and Health.

M&J will be responsible for gathering required participant data to evaluate and track the overall results and success of the Partnership. This data will be shared with OSHA. OSHA will be responsible for submitting the annual evaluation.

VIII. VERIFICATION

- Verification Enforcement Inspections: OSHA will conduct the initial verification enforcement inspection no sooner than three months after Partnership participants formally enter into this Agreement. During this period, Partnership participants should develop and implement the safety and health management systems required under this Agreement. After this period, OSHA will conduct the verification enforcement inspections annually thereafter. Verification enforcement inspections will be conducted as a focused inspection, per the appropriate OSHA guidelines. Compliance Safety and Health Officers (CSHOs) who are familiar with the Project will do verification enforcement inspections. Employee rights under the Occupational Safety and Health Act (OSH Act) will be afforded. During the verification enforcement inspections, if OSHA personnel identify serious hazards that site management refuses to correct, the scope of the inspection may be expanded.
- Complaint/Referral Investigations: This Partnership provides for the immediate response to each allegation of a safety or health hazard brought to its attention by any person. Upon finding that an allegation is valid, the employer shall promptly abate the hazard.

- OSHA agrees that a copy of each non-formal complaint/referral related to the work site and filed with OSHA will be forwarded by fax, or by CSHO, Market & Johnson's Project Management office on-site. In accordance with applicable law, the name of a complainant requesting confidentiality will not be revealed. M&J agrees to investigate these complaints, regardless of the employer involved, and provide OSHA with a written response within 5 working days of receiving the non-formal complaint/referral.
- Accident Investigations: Employers engaged in this Partnership recognize that OSHA fully-investigates accidents involving a fatality or serious physical harm. If during the course of the investigation OSHA determines that the incident resulted from violations of the OSHA standards, the employer will not be afforded Partnership incentives.
- Onsite non-enforcement verification consisting of a worksite review will be conducted as part of the quarterly partnership meeting, as resources allow. In cases of Pandemics such as; COVID-19, off-site verification 'visits' may be performed.

IX. INCENTIVES

Participant benefits from OSHA may include:

- Maximum penalty reductions for good faith and history, to the extent allowed by the OSHA Field Operations Manual (FOM), OSHA Instruction CPL 02-00-160 (August 2, 2016).
- In the event that a citation with penalties is issued, the Area Director has the authority to negotiate the amount of an additional penalty reduction as part of the informal conference settlement agreement, which is consistent with OSHA's current policy regarding this matter.
- Priority consultation service and assistance for small employers working on the construction site from the Wisconsin Onsite Consultation program.
- An OSHA focused inspection is available where the Partnership participant has an effective safety and health management system fully compliant with 29 CFR Part 1926.20 and 29 CFR Part 1926.21. (For additional details, refer to the August 22, 1994 memo signed by then Deputy Assistant Secretary for OSHA James Stanley, which was revised on September 20, 1995.)

X. OSP MANAGEMENT AND OPERATION

M&J and its contractors, in association with the U.S. Department of Labor/Occupational Safety and Health Administration – Eau Claire Area Office, Wisconsin Safety and Health Consultation Program, and all listed Labor Unions, will form a partnership committee to monitor the implementation of this Agreement. It will consist of a representative from each of the designated partners. M&J will serve as the chairperson and as OSHA's primary contact. The committee will review contractor compliance and involvement in the partnership; analyze jobsite audits; initiate improvements; and evaluate modifications, achievements, and success of the partnership.

M&J will:

- Implement comprehensive safety and health programs, which include:
    - management commitment and employee involvement,
    - hazard analysis,

    - hazard control, and
    - worker education and training.

- Mentor subcontractors who have not yet developed their own safety and health programs and, if necessary, refer them to OSHA-Eau Claire Area Office and/or the Wisconsin Safety and Health Consultation Program, for assistance.
- Implement a six-foot fall protection requirement throughout the Project.
- Participate in the National Safety Stand-Down to Prevent Falls in Construction, Trench Safety Stand Down Week, Ladder Safety Month, Safe + Sound Week, and NSC National Safety Month.
- Share the responsibility for overseeing site safety, serving as a point of contact, and overseeing the partnership goals.
- Ensure daily safety observation is conducted and documented.
- Ensure that all subcontractors are invited and encouraged to participate in jobsite safety meetings/toolbox talks on a weekly basis and document all attendance and topics.
- Ensure a focus on Well-being during the project. Develop a culture where all people feel they are part of something extraordinary by managing risk, creating a safe environment, and demonstrating the highest standard of care for each other.
- Review monthly incident summaries, including first aid, injury, and near-miss reports, with management and the safety committee.
- Onsite non-enforcement verification reviews will be conducted as part of the quarterly partnership meeting. A union representative can choose to be part of the inspection group. If non-compliant activity or hazards are discovered, immediate correction is required. M&J will document the corrective action taken, and share this information during the quarterly update meetings. A referral for an enforcement inspection will be made if management refuses to correct a serious hazard identified during the non-enforcement verification visit.
- Agree to allow OSHA representatives site access during inspection activities (monitoring and un-programmed activities such as fatalities and employee complaints).
- Audit the Partnership and make recommendations for improvement.
- Share and make available to all workers at the site jobsite observations and near-miss incident report summaries.
- Require the use of appropriate personal protective equipment by all entering the worksite. Appropriate personal protective equipment, including ANSI-approved hardhats, eye protection and high-visibility reflective vests or high-visibility clothing as a minimum, will be worn at all times on the worksite.

OSHA will:

- Participate, to the extent resources permit, in the quarterly meeting with Partnership participants.

- Designate an Eau Claire Area Office contact to be used as a resource for technical issues, and who will be available to assist with safety and health training/toolbox meetings.

- Give priority to the construction project when technical assistance is needed.

- Audit the monthly reports/documents and make recommendations for improvements in the meeting of Partnership goals.

- Conduct inspections in accordance with sections VII and VIII of this Partnership

- Conduct the annual Partnership evaluation report in accordance with section VII of this Partnership.

Wisconsin Safety and Health Consultation Program will:

- Appoint a representative to the committee.

- Participate in quarterly partnership meeting and site reviews, as resources permit.

- Provide/assist in training as resources permit.

- Give priority consideration to requests for services to small contractors who are engaged in work at the Project as resources permit and in conformance with the scheduling priority criteria requirements outlined in the consultation policies and procedures manual.

- Provide industrial hygiene, safety, and ergonomics consultation services upon request as resources permit.

- Perform quarterly jobsite inspections.

Labor Unions will:

- Represent all unions affiliated with the work trade scopes of this project.

- Assist in additional safety training to their respective union members.

XI. WORKER AND EMPLOYER RIGHTS

This partnership does not preclude workers and/or employers from exercising any rights provided under the OSH Act (or, for federal workers, 29 CFR 1960), nor does it abrogate any responsibility to comply with rules and regulations adopted pursuant to the Act.

XII. PARTNERSHIP TERM

This agreement will terminate on June 31, 2028, or at completion of construction, which is two years from the date of signing. If any signatory of this agreement wishes to terminate its participation prior to the established termination date, written notice of intent to withdraw must be provided to all other signatories.

XIII. SIGNATORIES

United States Department of Labor
Occupational Safety & Health Administration

Based upon a mutual interest to protect construction workers, the parties below agree to the above terms on the M&J /OSHA Partnering Agreement for the St. Croix Health in Eau Claire, Wisconsin.

Signed this ____day of _____, 2026

OSHA Occupational Safety and Health Administration	OSHA, Eau Claire Area Office Signature: _____ Printed Name: Ruth "Mitzy" Wright, Area Director
WisCon	Wisconsin On-Site Safety and Health Consultation Program Signature: _____ Printed Name:
Market and Johnson Construction Company	Market and Johnson, Inc. Signature: _____ Printed Name: **Kyle Gruber**