

OSHA Challenge - Construction Track - Stages at a Glance

| 1. Management Leadership | | | |
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| Element | Stage I | Stage II | Stage III |
| 1.1 Management Commitment | | | |
| Vision and Policy Statements | -Develop, issue, and communicate S&H Vision Statement and S&H Policy Statement. | -Communicate Vision and Policy Statements to all company and subcontractor employees; incorporate into new employee/subcontractor orientation. -Include the vision and policy in bid packages. | -Take proactive steps to ensure company and subcontractor employees understand the S&H Vision and Policy Statements. -Ensure policies becomes an integral part of routine activities and decision making during all phases of construction |
| Leadership | -Establish a policy requiring company and subcontractor, if applicable, executives, managers, and supervisors to participate and demonstrate leadership in S&H activities | -Continue participation by top executives and managers. -Require subcontractors to adopt and begin implementing leadership policies and increase frequency of management participation in S&H activities. | -Continue to ensure total involvement in S&H of all company and subcontractor senior management, supervisors and lead persons. |
| Resources | -Develop safety and health budget and commit and ensure utilization of adequate resources. -Establish and implement a policy that integrates S&H into the overall company management planning and budgeting process. | -Provide additional resources for S&H activities, including access to certified S&H professionals, if necessary, and licensed health care professionals, and improve integration of S&H into other planning activities. | -Continue committing and ensuring the utilization of adequate resources by company and subcontractors. -Ensure integration of S&H in all company and subcontractor planning and budget processes in the company. |
| Goals and Objectives | -Set and communicate annual S&H goals and objectives based on findings from baseline hazard and trend analyses, and S&H perception survey results. | -Review progress towards achievement of S&H goals & objectives; establish & communicate new goals, as appropriate. -Require subcontractors to develop goals and objectives consistent with Challenge participation. | -Company and subcontractors review, revise, and communicate S&H goals and objectives -Ensure S&H goals and objectives are routinely considered in company's and subcontractor's activities and programs. |
| Communication | -Establish clear lines of communication throughout all aspects of company operations. -Provide reasonable access to senior management on S&H issues. | -Maintain clear lines of communication with company and subcontractor employees re: S&H issues | -Continue open dialogue between company and subcontractor management staff and employees. |
| Roles, Responsibilities, Authorities, and Accountability | -Develop a S&H accountability plan for managers/supervisors and non-supervisory employees. | -Communicate and implement accountability plan. -Assign additional responsibilities to non-supervisory employees as appropriate. -Encourage subcontractors to adopt and begin implementing similar accountability plan or establish equivalent process. | -Fully implement accountability system for all company and subcontractor workers, including incorporating S&H responsibilities into job descriptions and performance plans. -Begin measuring performance of S&H responsibilities in annual performance appraisal processes. |

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| Discipline | -Establish a company disciplinary policy for all employees re: compliance with S&H regulation, rules, procedures, etc. | -Continue to implement disciplinary plan with an implementation schedule for managers and employees. -Require subcontractors, if applicable, to adopt company disciplinary policy or establish equivalent policies. | -Ensure discipline is equally enforced for company and subcontractor employees. |
| Annual Self-Evaluation | No action required. | -Develop a written plan/procedure for conducting annual self evaluations and other evaluations, including a requirement for narrative reports. -Encourage subcontractors to adopt a similar policy or establish an equivalent process. | -Company and subcontractors implement systems and written procedures to annually evaluate the S&H management systems. -Company and subcontractors complete at least one annual self-evaluation of the S&H management system. -Complete an evaluation prior to completion of construction. |

| 1.2 Employee Involvement | | | |
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| S&H Perception Survey | -Conduct S&H Perception Survey for employees and subcontractor employees, if applicable. | -Review and respond to survey findings and conclusions. | -Conduct follow-up S&H Perception Survey to identify further needed improvements. |
| S&H Perception Survey Change Plan | -Develop an action plan to address findings from the S&H Perception Survey. | -Implement steps defined in the company's action plan to improve S&H culture. -Require subcontractors to develop action plan to address findings related to them. | -Continue implementing action plan |
| Employee Notification | -Notify all employees of their S&H rights under the OSH Act and inform them of the company's participation in Challenge program. Discuss the VPP principles. -Encourage the reporting of hazardous conditions | -Notify new employees of their S&H rights, company participation in Challenge, & VPP principles. -Incorporate into new employee/subcontractor orientation. -Require the reporting of hazards. | -Inform all employees annually of worker rights and include elements in company/project site orientation for new company and subcontractor employees. -Reinforce as appropriate. |
| Employee Involvement | -Develop a plan and implementation schedule for involving employees in developing a company safety and health program (e.g. S&H teams) and begin involving employees in S&H activities (e.g. safety audits) | -Increase participation on teams, and/or form additional teams. -Involve employees in S&H activities (e.g., accident/near-miss investigations). -Require subcontractors to adopt and begin implementing company policy, participate in company activities, or equivalent processes. | -All teams are functioning and meaningfully contributing to S&H. -Ensure teams are routinely conducting audits, accident/incident investigations, self- inspections, and job hazard analyses. -Utilize team input to improve and continue the company's hazard reporting system. -Encourage more active and open subcontractor participation. |

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| 1.3 Subcontractor Worker Coverage (If applicable) | | | |
| Equal S&H Protection | -Develop and begin implementing a plan for how subcontractors will provide their employees with equal S&H protection | -Work with subcontractor to improve and continue implementing subcontractor program. | -Work with subcontractor to improve and continue implementing subcontractor program. |
| Adherence to Rules | -Require subcontractors and their employees to comply with OSHA and company S&H rules. Inform all subcontractor employees of this requirement before work begins. | -Develop a system to handle S&H violations of subcontractor employees working on-site. | -Improve and continue to enforce company policy for S&H violations. |
| Subcontractor Hazard Correction | -Establish a requirement that subcontractors promptly correct hazards involving their work activities. | -Formalize and begin implementing methods to ensure that hazards are identified, corrected, & tracked in subcontractors' work areas including assignment of responsibility. | -Ensure subcontractors effectively implement systems to identify and correct hazards in their work areas and include responsibility for hazard correction in writing. |
| Subcontractor Selection | -Require in bid documents to include subcontractor injury and illness records for past three years (if available), and copies of their written S&H program. -Consider the above information in when selecting subcontractors for work. | -Implement policy and process for addressing S&H performance of potential bidders. | -Continue to encourage and reinforce the importance for subcontractors to develop and implement good effective S&H management systems. |
| Removal Policy | No action required. | -Establish and communicate a formal policy on subcontractor S&H violations, including removal and possible financial penalties. -Include policy in the company contract requirements. | -Hold subcontractors responsible for correcting hazards created by their work and ensure any penalty policies are understood by all subcontractors and tier contractors described in their contracts. |

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| 2. Worksite Analysis | | | |
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| Element | Stage I | Stage II | Stage III |
| Baseline Safety and Health Hazard Analysis, including Industrial Hygiene (IH) Surveys | -Conduct a S&H baseline analysis including a review of previous accidents, injuries, and illnesses; complaints; previous studies; etc. | -Require subcontractors to perform baseline analysis as necessary in accordance with OSHA and company requirements and share pertinent information with the general contractor, or other subcontractors. | -Repeat baseline surveys, if warranted, by significant changes in tasks, equipment, or processes. |
| Hazard Analysis of Routine Jobs, Tasks, and Processes | -Review routine tasks to ensure compliance with local, state, and Federal safety and health regulations -Begin to formalize system to ensure employees are properly trained on routine jobs, tasks, and processes | -Conduct hazard analysis for work and recommend controls for routine jobs, tasks, & processes that have potential to cause an injuries/illnesses or significant incidents; are perceived as high-hazard; or are required by a regulation or standard. -Update the company hazard analysis, as appropriate. -Require subcontractors to adopt and implement hazard analysis of routine work tasks. | -Conduct hazard analysis and recommend controls for routine jobs, tasks, and processes that have written procedures, have been recommended for more in-depth analysis, or are determined by the Challenge participant to warrant hazard analysis- Ensure subcontractors continue implementing similar processes. |
| Hazard Analysis of Significant Changes | -Establish and begin implementing systems for identification and documentation of S&H hazards of significant changes, new processes, and changes in design/engineering plans. -Require subcontractors, if applicable, to adopt and begin implement similar systems. | -Continue conducting hazard analysis for significant changes (e.g., non-routine tasks or new processes, materials, equipment and facilities/project site) and recommend controls prior to the activity or use per company requirements and OSHA standards. -Subcontractors implement a policy and begin identify and document hazards of significant changes. | -Continue conducting and documenting hazard analysis for significant changes (e.g., non-routine tasks or new processes, materials, equipment and facilities/project sites) and recommend controls prior to the activity or use. |
| Pre-use Analysis | -Establish and begin implementing a pre-use analysis of new equipment, chemicals, facilities/project sites, or significantly different operations or procedures and recommend controls prior to the activity or use. -Require subcontractors to develop and implement similar systems. | -Continue conducting pre-use analysis of new equipment, chemicals, facilities/project sites, or significantly different operations or procedures and recommend controls prior to the activity or use. -Subcontractors begin performing pre-task analysis of work they are contracted to perform. | -Continue pre-task hazard analysis of new equipment, chemicals, facilities/project sites, or significantly different operations or procedures and recommend controls prior to the activity or use. |
| Industrial Hygiene (IH) Program | No action required. | -Establish, document, & implement future sampling schedule, strategy, and rationale, e.g., develop a formal written IH program. -Follow-up on results of baseline IH study. -Conduct more in-depth analysis if warranted to determine actual employee exposures. -Require subcontractors to participate in the company IH program where necessary. -Follow-up on results of subcontractor baseline IH study, if applicable, and conduct more in-depth analysis, if warranted. | -Continue implementing the written IH programs taking proactive steps to improve control of health hazards to prevent occupational disease. |

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| Routine Self-inspections | <ul style="list-style-type: none"> -Establish a routine self-inspection program that ensures S&H inspections are performed as often as necessary -Train company employees in the recognition and avoidance of hazards in their work area | <ul style="list-style-type: none"> -Develop a system for scheduling routine self-inspections of the workplace; conduct inspections with S&H staff. The entire site must be self-inspected as often as necessary, but never less than weekly. -Require subcontractors to adopt similar policies. | <ul style="list-style-type: none"> -Conduct routine self-inspections covering entire worksite as often as necessary, but at least weekly. -Ensure subcontractor processes implement similar self-inspection processes. |
| Hazard Reporting System for Employees | <ul style="list-style-type: none"> -Use data collected from accident incident reports and other sources to determine areas to concentrate on -Obtain supervisor and employee input for suggested plan of action in developing a hazard reporting system | <ul style="list-style-type: none"> -Develop & begin implementing hazard-reporting system for employees (maybe anonymous), requiring timely responses back to employees. -Require subcontractors to participate in the company process or establish equivalent processes. | <ul style="list-style-type: none"> -Continue implementing hazard reporting systems and encouraging more active reporting by both company and subcontractor employees; ensure timely investigations of the hazard reported, ensure regular feedback, using different media, to all employees on status of hazards reported. |
| Investigation of Accidents and Near-Misses | <ul style="list-style-type: none"> -Develop and implement requirements to report and investigate incidents/accidents. -Investigate accidents and prepare and maintain written reports of investigations. -Involve employees in the investigations. -Require subcontractors, if applicable, to adopt and begin implementing similar systems. | <ul style="list-style-type: none"> -Company and subcontractors expand investigation activities to include near misses and make findings available to employees. | <ul style="list-style-type: none"> -Continue reporting and investigating accidents/incidents and near-misses. |
| Trend Analysis | <ul style="list-style-type: none"> -Conduct initial trend analysis of 3 previous years' injury & illness rates and begin developing a plan for conducting analysis of other S&H-related information. | <ul style="list-style-type: none"> -Conduct trend analysis of other S&H information not yet studied; conduct one of injury & illness history if a year has gone by since initial analysis. -Require subcontractors to develop and implement similar systems. | <ul style="list-style-type: none"> -Conducts trend analysis regularly (at least annually) of company and subcontractor S&H information and use results in setting future goals to address trends. |

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| 3. Hazard Prevention & Control | | | |
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| Certified Professional Resources | -Ensure outside sources are available in needed to conduct baseline hazard analysis. | -Ensure adequate resources (e.g., access to certified S&H professionals, licensed health care professionals) -Subcontractors ensure adequate resources, as well | -Continue to provide necessary resources (e.g., Certified Safety Professionals, Certified Industrial Hygienists). |
| Hazard Elimination & Control Methods | -Establish systems to prioritize and implement controls for identified hazards, through the baseline S&H study, trend analysis of OSHA logs, and accident investigations. -Identify options and selection most appropriate option or combination for hazard elimination and control -Require subcontractors to adopt company hazard elimination and control system or implement equivalent | -Develop an action plan to prioritize and implement controls for hazards identified through self-inspections, employee reports of hazards, and near-Miss investigations. -Selects most appropriate control methods. -Implement hazard controls (or interim protection) for top priority hazards before moving onto Stage III. -Subcontractors implement equivalent systems for hazard elimination and control methods. | -Complete long term abatement projects from Stage II. -Continue to identify, prioritize, and implement control for hazards identified through all means (hazard analysis, trend analysis, accident and near miss investigation, self-inspections, employee reports of hazards, pre-use analysis, etc) so that there is a continuous loop of hazard identification and control. |
| Hazard Control Programs | -Inventory existing hazard control programs required by OSHA standards. Develop missing programs or modify if necessary. -Develop appropriate company S&H rules, standards, manuals, etc. -Require subcontractors, if applicable, to develop and implement similar effective programs. | -Continue to implement hazard control programs developed or modified in Stage I and train all workers on these programs. -Subcontractors implement effective hazard control programs, standards, rules, etc. | -Continue to maintain hazard control programs required by OSHA standards, and other rules and regulations. -Review hazard control programs annually and update them as new processes, jobs, and tasks are begun. |
| Tracking of Hazard Correction | -Develop and begin implementing a hazard tracking system for hazards identified through the baseline hazard analysis, trend analysis of OSHA logs, and accident investigations. -Require subcontractors to adopt and implement company tracking system or establish equivalent. | -Continue implementing and improving tracking system -Subcontractors implement effective systems to track hazard identified in baseline hazard analysis, trend analysis, and self-inspections. | -Company and subcontractor tracking systems are fully functioning and include hazards identified through all methods. -Communicate with workers throughout the process on the status of hazards until they are abated. |
| Preventive Maintenance of Equipment | -Conduct an inventory of equipment and machinery requiring preventive maintenance (PM). -Require subcontractors, if applicable, to develop a similar PM program. | -Review equipment inventory. Establish and implement a preventive maintenance schedule. -Subcontractors implement preventive maintenance program to ensure the safe upkeep of equipment operating the project site. | -Continue to perform preventive maintenance as scheduled. -Schedule is routinely observed and preventive maintenance is regularly conducted. -Subcontractors have preventive maintenance inventory and schedule and it is being conducted. |

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| Occupational Health Care Program | <ul style="list-style-type: none"> -Conduct thorough review of injury/illness records. -Compare with insurance claims loss runs to ensure records are in order. -Utilize licensed health care professionals if needed. -Require subcontractors to provide access to health care services based on baseline S&H analysis, including physician and emergency medical care. | <ul style="list-style-type: none"> -Continue to provide access to licensed health care providers, health services, physician care, and emergency medical care as needed. Arrange for services based on the outcomes of the baseline S&H analysis. -Subcontractors determine how licensed health care providers, health services, physician care, and emergency medical care will be provided for their employees working on-site and communicate this information to their employees. | <ul style="list-style-type: none"> -Continue providing services listed in Stage I and II. -Consider seeking health care providers to visit the site/project, and assist in identifying causes and symptoms of injury/illness. -Care provided is within the scope of contracts, licensure, and standard operating procedures. |
| Emergency Preparedness and Response | <ul style="list-style-type: none"> -Establish and communicate to company and subcontractor employees written procedures for addressing responses responding to all types of emergencies. -Conduct at least one evacuation drill to assess effectiveness of how procedures. -Make emergency services available on all shifts such as emergency transportation, EMT's, emergency clinics, or hospital emergency rooms. -Ensure at least one employee trained in first aid & CPR for each shift. -Require subcontractors to adopt the company emergency procedures or equivalent. | <ul style="list-style-type: none"> -Continue communicating emergency procedures and providing emergency medical services. -Establish an Emergency Response Team including first aid and CPR trained employees and subcontractors -Conduct at least one drill with company and subcontractor employees and assess its effectiveness and follow-up on recommendations to improve emergency evacuation drills. | <ul style="list-style-type: none"> -Continue to improve written emergency procedures for responding to emergencies on all shifts. -Review results of previous drills and conduct an annual drill. -Establish one operational emergency response team for each shift. -Ensure full implementation of site's emergency preparedness and response plan. |

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4. Safety and Health Training

| Element | Stage I | Stage II | Stage III |
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| General Guidelines | -Observe OSHA guidelines in providing training for required programs. | -Continue observing OSHA VPP guidelines in providing training. | -Continue observing OSHA VPP guidelines in providing training |
| Training for All Workers | -Provide training to all workers on their S&H rights, Challenge, VPP principles, hazards in the workplace, PPE, emergency evacuation procedures, and individual emergency responsibilities. -Ensure training is recorded. -Maintain a record of training conducted. | -Continue providing training to all workers, including new workers, on their S&H rights, Challenge, VPP fundamental principles, hazards in the workplace, PPE, emergency evacuation procedures, and individual emergency responsibilities -Ensure subcontractors are fulfilling their obligations to train their employees to recognize hazards in the workplace. | -Continuously improve safety and health training to workers. |
| Training for Specific Groups of Workers | -Provide specific training to managers and supervisors, to designated S&H staff and others with S&H responsibilities, and provide them with knowledge & skills needed to perform their S&H responsibilities in (i.e., hazard recognition, accident investigation and root cause analysis, hazard controls, OSHA standards, and VPP requirements). | -Expand specific training to all selected employees, managers and supervisors, and designated S&H staff. -Subcontractors provide specialized training to their employees on how to perform their assigned and contracted work and control/eliminate its hazards. | -Take proactive steps to provide specific training to their employees and share the knowledge & skills and lessons learned. |