

# ANNUAL EVALUATION FORM

TODAY'S DATE:	ORGANIZATION NAME:
CONTACT NAME:	ADDRESS:
EMAIL:	CITY:
PHONE:	STATE: ZIP:

Four Key Sections
Leadership + Culture + Procedures + Records and Data Management

Levels of STAR Membership Platinum score is 217 to 252 points Gold score is 181 to 216 points Silver score is 145 to 180 points Bronze score is 109 to 144 points

# **INSTRUCTIONS**

Review each key section carefully and evaluate your company's standard practices and/or policies currently in place.

How to score points:

Start your review with the first point subsection (12 points). If your company meets all guidelines/practices, you can score 12 points in the text box under SCORE SECTION.

If you cannot agree that your company meets all guidelines under the 12 point section move on to subsection 8 – 0. Score yourself accordingly in the SCORE SECTION text box.

IMPORTANT NOTE: If you do not evaluate your company 8 points and above this is a key indicator that those areas need additional attention moving forward.

Download fillable PDF, fill out information, then SAVE the document when completed and please send to Mike Flowers by email: <a href="mike@nuca.com">mike@nuca.com</a>. The evaluation from will then be submitted to the NUCA Safety STAR Review Board; the review board may request additional documentation (i.e., supporting safety policies, mission statement, training records, etc.).as part of the overall review process prior to awarding your STAR level membership.

Let's get started!

# **LEADERSHIP – SECTION 1**

# 1A. Leadership/ Management Participation Point Scale

#### ➤ 12 Points:

- Owner/ top leadership directly and actively participates in the company's safety process
- o Top leadership instills personal accountability for safety throughout the company
- Top leadership tracks and quarterly reviews safety goals and objectives for the company
- o Top Leadership solicits continuous feedback on the safety process
- O Top Leadership commits resources to (trainings, money, equipment and supplies) for the safety process necessary to reach safety goals
- o Safety performance is assessed in everyone's performance evaluation (all personnel)
- o Top leadership integrates into every facet of the company's operation

# > 8 points:

- o Top leadership participates in the safety process
- o Personal accountability for safety is expected, but there is little or no recourses if not demonstrated
- o Top leadership is aware of the safety process but does not track any progress
- O Top leadership provides the necessary resources for safety compliance

# ➤ 4 points:

- O Top leadership supports safety but does not participate
- There is little personal accountability for safety
- o Limited funds for safety resources

# $\triangleright$ 0 points:

- o Top leadership is not involved in the safety process and demonstrates little to no interest
- o Safety is left to supervisory personnel to deal with on an "as needed" basis
- There is no accountability for safety
- No funding or little funding for safety resources

Insert s	core	from	section	1 <i>A</i>

# 1B. Safety mission statement

# ➤ 12 Points:

- o The mission statement is in writing and signed by top leadership
- o Is reviewed and tested in the new hire orientation process
- o Explains the value of safety in the company
- o Commits to protecting employees, continually improvement to the program involving all employees
- o States companywide accountability for safety and all employees
- o Is posted and is part of all employee's safety policy

# ➤ 8 Points:

- o There is a policy, and it is in writing
- o The policy is not explained to employees, but most know there is a policy
- o Goes over the employee's general commitment to a safe workplace
- o Is posted and is part of the employee's safety policy or it is in the company's safety manual



- o Policy exists but is not posted and is not in the safety manual
- o Policy is not explained to the employee, and most do not know there is a mission statement

### > 0 Points:

No mission statement exists

Insert score from section 1B

# 1C. Safety Procedures

### ➤ 12 Points:

- o Responsibilities for safety are clearly defined for every employee including specialty contractors
- Responsibilities include but not limited to, hazard and injury reporting, PPE use, safety policy compliance and all aspects of the safety program
- o Supervisory personnel have an additional responsibility that are reviewed with them at time of promotion or at the time of hire
- There is a policy that holds every employee accountable, including contractors, for safety and is universally applied

### ➤ 8 Points:

- o Responsibility for safety is defined for every employee in the company
- o Accountability for safety is not always universally applied
- o Explained to employees at time of hire or at the new hire orientation
- o Is in writing and is part of the employee safety policy

# ➤ 4 Points:

- o Responsibility for safety is with the safety manager or designated safety officer or the safety committee
- o Responsibilities are not in writing
- o Employees know there is a responsibility for "being safe"
- o There is little to no accountability for safety

### > 0 Points:

o Responsibility for safety has not been defined within the company

Insert s	score	from	section	1C

# 1D. Safety Training and Resources

# ➤ 12 Points:

- o All safety training resources are regularly budgeted (funds, time, personnel, materials and equipment)
- o Return on safety investment is tracked (actual and projected) to evaluate effectiveness of resource allocation and to guide future expenditure decisions
- o Resource funding and expectations are explained to supervisors at the time of promotion or at the time of new hire or appointment

#### ➤ 8 Points:

- Reasonable resources are budgeted or invested in safety
- O Supervisors are generally aware of the company's resources that are available

### ➤ 4 Points:

- o Minimal investments are made in safety training
- Money is taken from general funds as needed to react to safety trainings and safety needs (OSHA fines, incidents and accidents, etc.)

### > 0 Points:

o Resources are not made available for safety trainings

Insert score from	section 1D		

# 1E. Employee Safety Evaluation and Performance Review

### ➤ 12 Points:

- o Top leadership reviews the safety program performance evaluations quarterly
- O The emphasis of the review is on whether the program is producing expected results and where opportunities for improvement present themselves
- Defined criteria exist against which performance is measured (safety surveys conducted, trainings held, incident rates, loss ratios, progress towards annual goals, safety meetings, OSHA inspection records, prevention of reoccurring incidents, employee participation, etc.)
- o Results are documented
- o Results impact safety staff and supervisor annual performance evaluation
- o Following each review, meetings are conducted with safety staff and supervisory personnel to discuss results and expectations

### > 8 Points:

- o Top leadership reviews the safety program annually
- o Some criteria exist against which performance is measured
- o Process is no documented
- o Results do not significantly affect the staff and supervisor evaluations
- o Results are eventually discussed with safety staff and supervisory personnel

### ➤ 4 Points:

- o Regular reviews of the safety program and performance do not exist
- Limited top leadership involvement mainly left to someone else (safety officer, safety manager, insurance company)
- O Subjective review of safety activities, mainly as a "year in review" and not an assessment of performance and improvement opportunity
- o Results may or may not be reviewed with supervisory personnel

>	<ul><li>0 Points:</li><li>No review of safety program and performance if performed</li></ul>
Insert score	e from section 1E

# **CULTURE – SECTION 2**

# 2A. Employee Engagement

#### ➤ 12 Points:

- Employees are actively engaged in the safety process (safety surveys, hazard reporting, incident investigation, safety instruction, toolbox talks, policy development, new hire mentoring, committees, job safety analysis development, pre-planning, etc.)
- Supervisory personnel are aware of these opportunities and actively encourage employee involvement
- O Participation opportunities are evaluated to ensure they are meaningful, necessary resources are available (time, money, staff, equipment, etc.) and potential barriers are identified and eliminated

### > 8 Points:

- Opportunities for employees to participate in safety process exist, but are not specifically documented
- Supervisors are provided limited training in soliciting employee participation, but nonetheless encourage involvement
- o Employees may be aware of opportunities, but there are no specific participation expectations
- o There is limited focus on identifying and eliminating potential barriers to participation

# ➤ 4 Points:

- o Employees are encouraged to participate in the safety process, but no efforts are made to engage them
- o Employees are offered a general communication, told to speak to immediate supervisor if there is a problem
- o An employee suggestion comment process is in place

#### > 0 Points:

o There are no opportunities for employees to participate in the safety process

	Insert	score	from	section	2A
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# 2B. Substance abuse and Awareness Program

### ➤ 12 Points:

- o The company's safety policy addresses and explains the substance abuse program
- o The policy includes random, pre-employment and reasonable suspicion substance abuse testing
- The policy is consistent and enforced
- O Supervisors and leadership are trained in workplace substance abuse recognition
- o Employee substance abuse and prevention education and training initiatives are offered
- The company has an employee assistance program (EAP)
- o The company keeps counseling and testing records
- o Specialty contractors are contractually required to have programs equal to or exceeding the general contractors

# ➤ 8 Points:

- o The company has substance abuse verbiage in the company safety policy
- o Substance abuse testing for new hire and pre-employment only
- o The company makes a minimal effort to enforce policy
- o Supervisors are trained in hazards of substance abuse on the job
- Specialty contractors are contractually required to conduct pre-employment testing

### ➤ 4 Points:

- o The company has substance abuse verbiage in its safety manual
- o Drug and alcohol testing is inconsistent
- o Company makes no or little effort to enforce substance abuse policy
- o Subcontract language does not include compliance

### ➤ 0 Points:

o There is no company policy regarding substance abuse

Insert	score	from	section	2B

# 2C. Safety Program Goal Setting and Reviews

### ➤ 12 Points:

- o A formal process is in place to biannually assess or establish safety program goals
- Action plans are developed, documented and implemented to assure goals are accomplished in a timely manner
- o Progression of action plans are tracked with status reports and feedback from those assigned the tasks
- Top leadership reviews goals, action plans and status reports with staff to provide feedback, direction and support of initiatives
- o Process is in place to evaluate degree of effectiveness action plan had achieving end goal

# ➤ 8 Points:

- o Safety Program goals are established periodically
- o A plan to achieve goals has been decided but not documented
- Status of action plan is informally checked but with no set frequency and with little to no follow-up or solicitation of feedback
- O Top leadership plays a minor part in the safety goal setting process
- o No process is in place to gauge the effectiveness of the action plan in achieving end goal

### ➤ 4 Points:

- o Informal or infrequent safety goals are established
- o There is little or no documentation or employee knowledge of goals
- o No realistic action plans are developed to accomplish goals
- Top leadership is not involved
- o Goals seldom tracked, reviewed or achieved

#### > 0 Points:

o There is no process of safety program goals setting

Insert score	from	section	2C

# 2D. Leadership Safety Meetings

# ➤ 12 Points:

- o The company holds and conducts weekly supervisor safety meetings
- o The company begins each meeting with a safety moment
- o The meetings include: a dedicated safety topic which is rotated weekly, pre-planned discussions, lessons learned and a review of all incidents.

# > 8 Points:

- At least monthly supervisor safety meetings
- o Meetings include a status report on site safety activities
- o Serious incidents are reviewed

#### ➤ 4 Points:

- o Supervisor safety meetings are held occasionally (less than one month)
- o There is a general discussion of the safety information given to supervisors
- o Serious incidents are usually reviewed

#### > 0 Points:

o The employer does not conduct supervisor safety meetings

Insert	score	from	section	$2\Gamma$

# 2E. New Hire Orientation

### ➤ 12 Points:

- o There is a documented safety orientation process in place for all newly hired or transferred employees that covers when, how and by whom each topic will be covered
- o Safety topics include but not limited to:
  - explanation of company safety mission statement and safety expectations
  - · individual safety responsibilities and accountability
  - PPE expectations with skills demonstrations
  - · Basic and advanced safety rule that pertain to site/ or major job hazard exposures
  - Hazard communication
  - · Review of substance abuse policy
  - · Identity of key competent persons and their specific roles
  - Orientation platforms include instructor led, video published training and other written materials
- New hires are assigned a special designation (decal, hardhat color) or safety mentor until their orientation is completed
- o New hire performance evaluation process is established to give feedback to new hires or a predetermined frequency (30 days, 60 days and 90 days)
- Documented records are maintained showing initial and promotional employee safety orientation has occurred

# > 8 Points:

- o Safety orientation is given to new employees; however, the process has not been formalized
- O Safety orientation topics include at a minimum:

- Explanation of employer safety commitment and expectations
- · Review of substance abuse policy
- · PPE expectations
- Basic safety rules that pertain to site and or major job hazard exposures
- · Hazard communications
- · Hazard, injury and emergency reporting procedures
- o Process may or may not involve a special designation (decal or hardhat color) or safety mentor
- There is no new hire performance evaluation
- o Record of safety orientation with employee signature is maintained

#### ➤ 4 Points:

- o Informal or on the job safety instructions given to new hires
- o No documentation is maintained

### > 0 Points:

o No orientation is given to new hire employees

Insert score	from	section	21

# 2F. Employee Safety Training

### ➤ 12 Points:

- O Based on an annual safety training needs assessment a database is developed and instituted (who needs what, when, how and who will be trained)
- o Formal training topics include:
  - · Recognition and control of hazards specific to work tasks
  - First Aid/ CPR/ AED
  - · OSHA topics (PPE, fire prevention and protection, tool safety, fall protection and prevention)
  - Driver safety and vehicle safety
- o Training is conducted by competent, qualified safety instructors (NUCA Certified Instructors)
- Company's set minimum levels of training annually (OSHA refresher courses, First Aid/ CPR biannually, etc.)
- o Employee training comprehension and understanding is documented, and records are retained
- o Records are kept of all training, to include dates, topics covered, student rosters, testing and trainers

# ➤ 8 Points:

- o Safety training needs are determined each year but a formal assessment and database are not used
- o Formal safety training topics include:
  - · Recognition and control of hazards specific to work tasks
  - · First Aid/ CPR/ AED
  - · OSHA topics (PPE, fire prevention and protection, tool safety, fall protection and prevention)
  - Driver safety and vehicle safety
- o Training is conducted by competent and qualified safety instructors (NUCA Certified instructors)
- Employees are only retrained as required by OSHA and when they are visibly lacking safety skills
- o Companies identify training by role and positions but may not have discipline to follow up or ensure employees understand the need

# ➤ 4 Points:

- o Informal or on the job safety training is arranged as needed
- O There is no established training matrix or database
- o Limited or no training documentation is kept
- o Company's executives exempt from training classes

#### > 0 Points:

No formal training is provided

Insert score from section 2F

# 2G. Safety Disciplinary Process

#### ➤ 12 Points:

- o A formal disciplinary process is in place to hold all employees accountable
- Action plans are developed, documented and implemented to assure there are no reoccurring disciplinary issues
- o Progressive disciplinary action are tracked with status reports and feedback from given to leadership
- O Top leadership reviews disciplinary reports, action plans and tracks reoccurring issues.
- o Process is in place to administer effective disciplinary action plan had achieving end goal
- o Forman and Leaders are training on how to effectively communicate, council and administer progress disciplinary and understand the levels of disciplinary action

# > 8 Points:

- o A disciplinary process is in place to hold employees accountable
- Action plans are developed and implement to assure there no further reoccurring disciplinary issues but not documented
- o Progressive disciplinary actions are documented, and reports are given to leadership
- O Top leadership plays a minor part in the disciplinary process
- No process is in place to gauge the effectiveness of the disciplinary process

# ➤ 4 Points:

- o Informal or infrequent disciplinary is conducted
- o There is little or no documentation or employees' disciplinary records or incidents.
- o No realistic action plans developed during the disciplinary process
- Top leadership is not involved

# > 0 Points:

O There is no process of safety program goals setting

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# 2H. Leadership Safety Training

# > 12 Points

- o All supervisory personnel receive training in:
  - · Company safety policy

- · Companies' supervisor safety expectations
- · First Aid/ CPR/ AED
- · OSHA 30
- · Competent Person
- · Emergency response procedures
- · Accident and incident investigation
- Job site safety inspections
- NUCA Crew Leader Training
- Opportunities for professional development
- Supervisors have access to a safety subject matter expert (SME)
- o Dedicated training facilities are available for competent and qualified trainers (NUCA Certified Trainers)

# > 8 Points:

- o All supervisory personnel receive training in:
  - Company safety policy
  - · Companies' supervisor safety expectations
  - First Aid/ CPR/ AED
  - OHSA 10
  - · Competent Person
  - · Emergency response procedures
  - · Accident and incident investigation
  - · Job site safety inspections
- O Supervisors have access to sources of safety information, materials and knowledge
- Annual refresher training is available but not mandatory

### ➤ 4 Points:

- O Supervisory personnel receive safety training in:
  - Company safety policy
  - Employers' supervisor safety expectations
  - First Aid/ CPR/ AED
  - · OSHA 10
  - · Competent Person
  - Emergency response
  - · Accident and incident investigation
  - · Job site safety inspections

# > 0 Points:

o There is no specific training program for supervisory personnel

Insert score from	section 2H		

# **PROCEDURES – SECTION 3**

# 3A. Investigation Process (Accident and Incident)

#### ➤ 12 Points:

- o Employer reviews all incidents including, good catches and potential and significant events.
- O Supervisors are trained in the techniques of incident investigation including, but not limited to root causes, preparing and investigation, interviewing techniques and source investigation.
- o Incidents are investigated promptly by top leadership and safety personnel and a primary report is completed with the first 36 hours
- o Reports are completed for all incidents
- o Documented corrective actions are taken
- o Final incident outcomes are openly shared across the organization to improve all safety performance

# > 8 Points:

- o Supervisors receive a basic level of incident investigation training
- o Incidents, good catches and potential significant events are investigated by site supervisors
- o Reports are completed for all incidents
- o Remedial actions are taken to prevent reoccurrence of similar incidents
- o Company reviews only serious incidents
- o Final notification of incidents is communicated to only leadership staff

# ➤ 4 Points:

- o Supervisors receive little or no incident investigation training
- o Incidents are usually investigated by site supervisors, but may be investigated by someone else
- o Reports are not always completed and communicated in a timely manner
- o Little or no attempt is made to identify casual factors or take corrective actions
- o Lessons learned are not shared openly across the organization

#### > 0 Points:

o Incidents are not investigated to determine casual factors.

Insert	score	from	secti	on	3A

# 3B. Incident Response Procedures and Policies

### ➤ 12 Points:

- o Companies have a comprehensive fire elimination plan that includes the following:
  - Training and maintenance on the use of fire extinguishers
  - · Only approved flammable and combustible containers are used
  - · Frequent and consistent disposal of combustible materials
  - · Evacuation procedures are posted, rally points are established, and a head count policy is in place
  - Mass casualty training is implemented for all staff and is routinely (at least yearly) training is provided
  - Emergency communication is implemented, and training is conducted yearly for all new leadership and current leadership

# > 8 Points:

O Company has a fire elimination plan that includes:

- Training and maintenance on the use of fire extinguisher
- Evacuation procedures are posted, rally points are established, and a head count policy is in place
- Mass casualty training is implemented for all leadership and is routinely (at least yearly) training is provided
- Evacuation procedures are established but not constantly communicated.

#### ➤ 4 Points:

- O Company has a fire elimination plan the includes:
  - · Annual toolbox talks on how to use fire extinguishers
  - · Informally communicated but not documented evacuation and head count procedures

### > 0 Points:

No emergency response plan is in place

Insert	score	from	section	3B

# 3C. Safety Rules and Policies

### ➤ 12 Points:

- o Safety Rules are:
  - · Written and are part of the employee safety policy
  - Explained to employees at the time of new hire
  - · Clear, concise and easy to understand
  - · Specific to trade and scope of work operations
  - Enforced equally among all employees
  - · Regularly updated to reflect change in company policy and regulation
  - · Specialty contractors are contractually bound to the general contractor's safety program

# > 8 Points:

- o Safety Rules are:
  - · In writing and posted but not necessarily in the employees' safety policy
  - Explained to employees at one time or another
  - · Specific to trade and scope of work operations
  - · Usually enforced equally among all employees
  - · Periodically updated to reflect change in company policy and regulation
  - If the company is a general contractor, specialty contractors are encouraged to comply with their safety rules

#### ➤ 4 Points:

- O Some general safety rules exist, but they are not posted or reviewed with employees
- o Rules that do exist are not necessarily specific to company's trade or scope of operations
- o Safety rules are not generally enforced
- o Safety rules are rarely reviewed or updated
- o Specially contractors are not required to follow general contractors' safety rules

#### > 0 Points:

o There are no safety rules

Insert score from section 3C

# 3D. Toolbox Talks and Trainings

# ➤ 12 Points:

- o Toolbox talks are held daily
- o Employees routinely lead the talks
- o The highest levels of leadership onsite are present and participate in toolbox talks
- o Top management occasionally attend and participate
- o Attendance and topics are documented

# > 8 Points:

- o Toolbox talks are held regularly, at least once a week
- o Attendance and topics are documented
- o Supervisors actively solicit employee participation
- o The highest level of leadership present attend and participate
- o Top leadership occasionally attends

# ➤ 4 Points:

- o Attendance and topics are documented
- o Employees are encouraged to participate

#### > 0 Points:

o Toolbox talks are not held or held occasionally

Insert score from section 3	Г
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# **3E. Inspections Processes**

### ➤ 12 Points:

- o Monthly jobsite safety inspections are conducted by the project manager
- o Weekly jobsite safety inspections are conducted by the site superintendent
- o Daily jobsite safety inspections are conducted by the site foreman
- o Inspections are documented along with assignment of responsibilities and expected completion date
- o Potential serious safety hazards are corrected immediately
- o Less serious safety hazards are corrected promptly
- o Follow up process to confirm action taken and that is producing expected results

#### > 8 Points:

- o Quarterly jobsite safety inspections are conducted by project managers
- o Monthly jobsite safety inspections are conducted by site superintendents
- o Inspection is documented along with assignment of responsibility and expected completion date
- o Potentially serious safety issues are corrected immediately
- o Less serious safety issues are corrected promptly

#### ➤ 4 Points:

- o Informal jobsite inspections are made by the site superintendent
- o Safety issues are corrected in a timely manner
- o There is no documentation or follow up

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No inspections are documented or conducted

Insert score from section 3E

# **3F. Personal Protective Equipment Procedures**

#### ➤ 12 Points:

- o Company has a PPE Policy in place
- o Company conducts an annual PPE needs assessment that is documented
- o Company continually invests in new and updated PPE as needed
- o Processes are instituted that are suitable and effectiveness of PPE is evaluated by employees
- o Employees are informed of PPE requirements for each job
- o Employees are trained, prior to use, in PPE selection, inspection and use and care
- o PPE refresher training is conducted at a minimum annually
- Company PPE Policy is consistently and universally enforced

#### ➤ 8 Points:

- o The company has a written PPE policy
- o Employees are informed of PPE requirements for each job
- o Employees are trained in PPE selection, inspection and use and care
- o Company PPE Policy is consistently and universally enforced

### ➤ 4 Points:

- o The company has PPE policy in place but is rarely enforced
- o PPE is provided and its use is encouraged
- o Some training on PPE use is provided
- o Company PPE policy is enforced inconsistently

#### > 0 Points:

o No PPE policy exists, and use of PPE is left to the discretion of the employee

Insert score	from	section	3]

# **3G.** Vehicle and Mobile Equipment Procedures and Policies

# ➤ 12 Points:

- o A written traffic control plan is competed, reviewed, and implemented for each project
- Whether self-performed or contracted the company ensure employees are trained and certified for flagging operations
- The company has a formal distracted and defensive driving policy in place that applies to all employees while driving company owned vehicles and equipment
- o Disciplinary policy in place for violating company policies on distracted driving
- o The company has a formal process in place to train and certify company vehicle and equipment operators which includes performance evaluations and is documented in personnel records and training records
- o Equipment inspections are conducted and documented per OSHA manufacturer's recommendations

#### > 8 Points:

- o The company has a distracted driving policy in place that addresses no hand-held devices (cell phones) will be used while driving or operating company equipment
- The company verifies equipment operators experience at the time of hire but does not have a formal performance verification process in place
- The hazards associated with vehicle backing is covered during annual training and includes performance evaluation and hands on practical, but is not documented in personnel records
- o Formal traffic control plans are implemented in some but not every project.

# ➤ 4 Points:

- o Flagging personnel are used to control traffic but there are no formal processes to ensure they are certified
- o The company does not verify the operator's experience
- The hazards associated with vehicle backing is only addressed during the review of the daily work assignment if applicable
- The company does not have a formal distracted driver policy in place (cell phone policy)

### > 0 Points:

- o The company does not have a defensive driving or cell phone policy in place
- Vehicle backing and equipment risks and not addressed by the company

0	Planning for work zone traffic control and flagging in not conducted
Insert score from	m section 3G

# RECORDS AND DATA MANAGEMENT – SECTION 4

# 4A. Documentation and Recordkeeping Policies and Procedures

- ➤ 12 Points:
  - o The Company maintains accurate and current records and documents for:
    - · OSHA injury and illness records
    - · Safety training includes verification of knowledge, skills and evaluations
    - Employee safety policy
    - · Incident investigations
    - Equipment inspections are documented
    - Site inspections and surveys, including verification of action taken
    - · Safety orientation
    - · Safety preplanning
    - · Safety committee meeting notes
- > 8 Points:
  - o The company maintains records and documents for:
    - · OSHA injury and illness records
    - · Safety Training
    - · OHSA required written programs
    - Employee safety program
    - · Incident investigations and near fatality and good catches
    - · Safety inspections and surveys
    - · Vehicle and equipment inspection
- ➤ 4 Points:
  - o OHSA injury and illness records
  - Basic safety policy
- > 0 Points
  - o No records are kept for safety related activities or policies

Insert score from section 4A