


Mobile Workforce



Demonstration for Construction

Occupational Safety and Health Administration
October 2, 2006

Background

The Occupational Safety and Health Administration (OSHA) has long recognized the value of cooperative efforts by employers, employees, and government agencies to reduce hazards and strengthen worker protection. The Voluntary Protection Programs (VPP), which recognize employers and employees who have established effective safety and health management systems, have been particularly successful. However, VPP was designed primarily for fixed worksites, and most businesses within the construction industry have not been able to participate.

In recent years, OSHA has worked with leading construction trade associations, labor organizations, and employers to find ways to adapt the VPP model to the unique characteristics and challenges of the construction industry. In collaboration with labor and industry, OSHA designed and implemented the Short-Term Construction and Mobile Workforce VPP Star Demonstrations in 1998. The Short-Term Construction Demonstration looked at a general contractor's ability to establish an effective safety and health program at the outset of a project, and the Mobile Workforce Demonstration aimed to test the feasibility of expanding VPP eligibility to employers whose employees routinely move from site to site with varying work tasks and hazard exposures.

In 2002, OSHA's Region V began piloting a modified Mobile Workforce VPP Star Demonstration within the Cincinnati Area Office. This pilot, which included both general and subcontractors, has been particularly successful. Participants' injury and illness rates have dipped as much as 40% below industry averages. OSHA's evaluations of the 10 participating employers have concluded that construction companies are able to implement effective safety and health management systems and provide protections equal to those found at fixed VPP sites.

Introduction to the Demonstration

Based on positive experiences with the Region V Mobile Workforce Demonstration and the other construction-related Demonstrations, OSHA is launching a nationwide VPP Mobile Workforce Demonstration for Construction. This Demonstration is intended to create greater opportunity for employers and employees in the construction industry to participate in VPP and, in so doing, to strengthen worker

protections significantly. At the same time, it will give OSHA additional opportunities to explore and test appropriate modifications to VPP, alternative requirements that will help us bring the benefits of this program to the construction industry. OSHA believes this new Demonstration will work for both companies that typically function as controlling general contractors and companies that perform specialty trade functions, regardless of size.

OSHA hopes you will respond to this opportunity to experience what employers and employees throughout the U.S. economy have experienced: significant decreases in fatalities, injuries, and illnesses; concomitant cost reductions including lowered workers' compensation expenses; positive changes in company culture and attitudes toward safety and health; and other reported benefits of VPP participation.

This Demonstration will not limit construction employers with long-term projects from pursuing site-based participation in accordance with established VPP policies. Construction industry participants in OSHA's existing Short-Term and Mobile Workforce Demonstrations will be transitioned to this Demonstration.

Eligibility

This Demonstration welcomes applications from interested employers throughout the construction industry. All applicants must have been in operation in the construction industry for at least 3 years. They may display varied characteristics. For example:

Applicants may range from controlling general contractors to specialty trade contractors working in the capacity of a subcontractor.

Applicants' projects may range from very brief timeframes to lengthy, multi-year contracts.

Applicants may employ mobile workforces, with employees moving frequently from site to site.

Applicants may or may not have authority and responsibility for safety and health over the entire worksite.

Employees of some applicants, for example, specialty trades, often may work alone and without regular supervision.

An applicant's inspection history for the past 3 years within the Designated Geographic Area (DGA) must include: no open investigations, no pending or open contested citations or notices under appeal, and no affirmed willful violations. Additionally, applicants must not have been subject to an Enhanced Enforcement Program activity for the past 3 years. OSHA history pertaining to an applicant's work outside the DGA may also be considered.

Unique Aspects of the Demonstration

Except as indicated below, all VPP requirements apply to this Demonstration. See *Federal Register* notice 65 FR 45649, July 24, 2000, as revised by 68 FR 68475, December 8, 2003.

Unique aspects of the VPP Mobile Workforce Demonstration for Construction include:

Oversight Jurisdiction: Applicants may apply at the company, division, or business unit level.

Designated Geographic Area (DGA): OSHA, after consulting with an applicant and considering the applicant's preference, will define the geographic area for participation. It must be under federal OSHA jurisdiction. A DGA cannot exceed an OSHA Regional boundary. Employers who wish to participate in multiple Regions should contact the OSHA National Office. (Note: Work performed within state-operated occupational safety and health programs is not covered by this Demonstration without a State Plan's agreement to participate.)

Injury and Illness Data: Applicants must provide combined rate information that reflects the nonfatal injury and illness experience of all employees over whom they have responsibility and authority for safety and health. This information must include subcontractor data. It is the applicant's responsibility to maintain records of hours worked by subcontractors under its employ within the DGA plus any recordable injuries and illnesses these subcontractors may experience. (See Appendix B for details)

Union Commitment: An applicant whose employees are represented by one or more unions will be responsible for obtaining either blanket support from the local construction building trades council or support from the individual unions that represent its employees. (See Appendix C for details)

Participation Plan: Each applicant will develop a unique participation plan. This plan will address elements of its participation that differ in substance or emphasis from the traditional VPP requirements. OSHA is interested in learning about the safety and health practices an applicant has adopted that address the hazards and unique conditions of the applicant's workforce and construction industry. This may include management leadership and employee involvement strategies that ensure employee protection, such as employees' ability to leave the worksite if unsafe conditions exist; hazard analysis that uses historical sampling data for a baseline; emergency response policies and evacuation

procedures appropriate to construction worksites; and other alternative approaches to safety and health.

Applicant Prescreening: Each applicant must describe in writing and be prepared to demonstrate that systems and procedures are in place and effectively implemented to assure VPP-quality safety and health protection at all active worksites within the DGA.

Two-phased evaluation of applicants: OSHA initially will conduct an onsite evaluation of the applicant's corporate, division, or business unit policies and procedures. This evaluation will also include a review of the applicant's safety and health management systems (SHMS), including systems for ensuring implementation of safety and health protection at all worksites within the DGA. It will include a document review and a careful assessment of the applicant's management commitment to safety and health and to VPP. This evaluation also will include interviews with senior officials and employees.

OSHA then will visit one or more construction worksites. These worksite evaluations will focus on verifying that the applicant's safety and health management systems are actually working. Generally, the number of evaluations will not exceed the number of programmed inspections an applicant would have received had it not applied to the Demonstration. Where an employer does not appear on the F.W. Dodge Reports (used by OSHA in the selection of construction worksites for inspection) and does not have a history with OSHA, the number of evaluations will be at the discretion of the Regional Administrator.

Industry Good Practices: VPP is a performance-based program that gives its participants latitude to address safety and health concerns in ways that are both effective and appropriate to their specific needs, culture, and industry. However, there are construction industry concerns which OSHA expects each applicant to address. These include, for example, fall hazards, trenching, industry-oriented training, subcontractor safety and health qualifications, and health issues such as substance abuse.

OSHA expects that Demonstration participants will address such concerns to the extent that they affect employees' safety and health, and will utilize industry good practices. This expectation is in line with the practices of VPP participants, who generally view OSHA standards as a minimum level of safety and health performance and set their own more stringent standards where necessary for effective employee protection. (See appendix D for details.)

Approval and Reapproval Process

Application Submittal: Applicants should submit their Demonstration Program application to the VPP Manager in the OSHA Regional Office with jurisdiction over their headquarters. Application guidelines can be obtained from the Regional Office or downloaded from OSHA's website. (Note: Applicants with Federal jurisdiction worksites whose headquarters fall under State Plan jurisdiction should submit

their application to the corresponding Regional VPP Manager.)

Priority for OSHA Challenge Participants: OSHA may offer an expedited application review and approval process to Demonstration Program applicants who have participated in OSHA Challenge. OSHA Challenge is a cooperative program that specifically prepares companies to meet VPP requirements.

Application Review: The Regional VPP Manager or VPP Coordinator will review the application and decide whether or not to accept it. If accepted,

The applicant, in consultation with OSHA, will develop a written participation plan that documents unique aspects of its participation.

The Regional VPP Manager or VPP Coordinator will contact the applicant to schedule the onsite review of headquarters and individual construction worksites.

Participation Level: In order to qualify for this Demonstration, the onsite review of headquarters must conclude that the applicant's safety and health management system meets all VPP Star requirements. The applicant's DGA will ultimately be recognized at either the Star or Merit level based on how well the aforementioned SHMS is implemented at the site(s) visited during the worksite evaluation phase.

Worksite evaluation visits: Whenever possible, the onsite evaluations that OSHA conducts will be unannounced. However, when OSHA needs to visit a site that an applicant does not control, the applicant must inform and gain written permission from the controlling employer (for example, the general contractor) for OSHA to enter. In those instances, OSHA will provide reasonable notice prior to its visit.

OSHA will focus primarily on the applicant's work at a site. However, the applicant must inform the controlling employer that any conditions (including those created by others) that OSHA views and deems a violation must be abated immediately or confirmed as abated according to an abatement plan approved by OSHA. In the VPP spirit of cooperation, OSHA will take no enforcement actions and issue no citations if the hazardous conditions are corrected immediately or with an approved plan. Only if correction does not occur will OSHA have the option to exercise normal enforcement procedures.

Approval: The Regional Administrator will submit a recommendation to the Assistant Secretary that reflects the findings of the VPP onsite evaluation team. The Assistant Secretary will issue the approval decision.

Removal from Programmed Inspections: Once an applicant is approved, all work performed within the DGA will be removed from OSHA's programmed inspection list.

Work will remain subject to unprogrammed inspections, such as complaints, fatalities, and catastrophes.

Reevaluations: Subsequent to approval, OSHA will conduct one or more reevaluation visits of a participant's worksites every 12 to 18 months for the duration of the Demonstration. Generally, the number of reevaluations will not exceed the number of programmed inspections an applicant would have received were it not participating in the Demonstration. Where an employer does not appear on the F.W. Dodge Reports (used by OSHA in the selection of construction worksites for inspection) and does not have a history with OSHA, the number of evaluations will be at the discretion of the Regional Administrator. OSHA will also reevaluate the participant's corporate, division, or business unit SHMS policies and procedures every 5 years.

Withdrawal/Termination from VPP: If a reevaluation does not meet the Demonstration requirements, the Regional Administrator will take one of the following actions:

Give the company 30 days to meet requirements, or
Ask the company to withdraw from the Demonstration.

If two reevaluations do not meet Demonstration requirements in 1 year, the Regional Administrator will ask the company to withdraw. If a participant chooses not to withdraw, the Regional Administrator will terminate the participant. If a participant is terminated they may not reapply for VPP participation for 3 years.

Management/Union Change: If at any time a participant experiences a change in management, a change in union representation/status, or other similar changes that affect VPP participation, the participant must notify the OSHA Regional Administrator in writing. The Regional Administrator will determine what steps, if any, must be taken to reaffirm VPP participation.

Where Can I Get More Information?

Your Regional VPP Manager or VPP Coordinator will be happy to provide you with additional information about VPP and answer your questions. Additionally, there is a wealth of useful information on OSHA's webpage, www.osha.gov. VPP information begins at:

<http://www.osha.gov/dcsp/vpp/index.html>

You also may direct your questions or comments to:

OSHA - Office of Partnerships and Recognition
200 Constitution Ave NW, Room N3700
Washington, DC 20210

Voice (202) 693-2213 Fax (202) 693-1671

Appendix A

APPLICATION AND VERIFICATION PROCESS

Application

The application process for the VPP Mobile Workforce Demonstration for Construction is similar to that of a traditional site-based application. OSHA will make available detailed application instructions on its website and through its Regional VPP Managers and Coordinators.

After an application is submitted to the Regional VPP Manager or Coordinator, the applicant and the Region must reach agreement on the Designated Geographic Area (DGA) to be covered by the application. OSHA will consider the applicant's preference, but the decision is OSHA's. Once the DGA has been established, the applicant will provide a list of active and anticipated sites within that area, so that OSHA may select and schedule an appropriate number of onsite evaluations. If the applicant anticipates a controlling employer's resistance to OSHA's entry at any sites, this should be noted on the list. To the extent appropriate, OSHA will focus on sites where there is no resistance to its entry. However, it is essential that OSHA have the opportunity to assess all primary aspects of an applicant's work and any out-of-the-ordinary, hazardous projects.

Participation Plan

As part of the application, each applicant also must develop a written participation plan. This document details the unique aspects of the Demonstration for a particular company. It should address the alternative policies/systems/programs that distinguish the applicant from a traditional VPP participant but that ensure equally effective protection. OSHA will make available detailed guidance for the development of a participation plan on its website and through the Regional VPP Managers and Coordinators. Applicants are encouraged to work with their VPP Manager/Coordinator when developing a participation plan.

Corporate Evaluation

Once an applicant and OSHA have agreed to a DGA and a participation plan, and once OSHA has accepted the application package, the applicant will undergo a two-part evaluation. First, the OSHA onsite evaluation team will visit the applicant's headquarters, that is, the corporate, division, or business unit office responsible for development and oversight of the safety and health management system (SHMS) within the DGA. The focus of this evaluation is to verify that the applicant has all of the policies and procedures in place to effect VPP Star quality safety and health at all locations within the DGA. This evaluation will also assess management's commitment to the VPP principles and requirements as a means to achieve employee safety and health. Therefore, the OSHA onsite evaluation team must determine that oversight, leadership, and commitment are present at all sites and that policies and procedures are in place that will ensure uniformity across the DGA. In addition, OSHA will verify all information described in the application and participation plan. Elements of the evaluation will include:

- Assessment of Management Leadership and Commitment: Interviews with senior level management responsible for the safety and health management system. Interviews could include those of the CEO, COO, VP, etc.
- Assessment of Employee Involvement: Determines whether there is evidence that employees are actively involved with the safety and health process. Also will determine if employees support participation in VPP. For details on how OSHA will determine employee support, see Appendix C.
- Corporate-wide Safety and Health Policies/Systems/Programs: Evaluation of safety and health policies, programs, and systems, and their consistent and uniform implementation throughout the DGA.
- Applicant's VPP Prescreening: OSHA expects an applicant to have systems and procedures for evaluating all its worksites, and to have actually evaluated its worksites, to ensure they are operating at VPP quality levels before OSHA comes onsite. This is what is meant by applicant prescreening. Prescreening should include the implementation at all worksites of VPP requirements and/or alternative elements found in the applicant participation plan. OSHA will review headquarters documentation and other evidence of the adequacy of applicant's prescreening.
- Measurement of Safety and Health Performance: Evaluation of the system for establishing annual safety and health performance goals, a tracking system to evaluate the status of these goals, and reporting of accomplishments.
- Recordkeeping: Assessment of applicant's systems for data collection, including the OSHA-300 log; information that the applicant must maintain to comply with OSHA standards; information OSHA requires VPP participants to submit annually; and other documentation related to operation of the SHMS. This includes first reports of injuries, accident and near-miss investigation reports, first-aid reports, medical surveillance reports, and any incentive programs.

This onsite evaluation must conclude that the applicant's safety and health management system meets all VPP Star requirements.

Worksite Evaluation

OSHA then will perform one or more worksite evaluations to determine if worksites are effectively implementing the safety and health policies and procedures established by the applicant. OSHA will determine the number of onsite evaluations as follows:

- Within an Area Office Jurisdiction. OSHA will conduct a minimum of one onsite evaluation. The Agency will make an effort to select sites that best represent the applicant's activities. The Area Director has the discretion to select the number of onsite evaluations based on the following criteria:
 1. The number of onsite evaluations needed to cover all the types of work performed by the employer.

2. The phases of construction and the nature of the hazards associated with such work.
3. The geographic scope of the application.
4. Other factors which OSHA determines may affect its ability to fully and accurately assess the effectiveness of the applicant/participant's safety and health management system.

The number of onsite evaluations normally will not exceed the number of programmed inspections the Area Director would otherwise expect an applicant to receive within the DGA during the Demonstration's timeframe. Where an employer does not appear on the F.W. Dodge Reports (used by OSHA in the selection of construction worksites for inspection) and does not have a history with OSHA, the number of evaluations will be at the discretion of the Area Director.

- Within a State/Regional Jurisdiction. For all applicants whose DGA covers more than one OSHA Area Office, OSHA will conduct a minimum of one onsite evaluation. The Agency will make an effort to select sites that best represent the applicant's activities. The Regional Administrator has the discretion to select the number of onsite evaluations based on the following criteria:
 1. The number of onsite evaluations needed to cover all the types of work performed by the employer.
 2. The phases of construction and the nature of the hazards associated with such work.
 3. The geographic scope of the application.
 4. Other factors which OSHA determines may affect its ability to fully and accurately assess the effectiveness of the applicant/participant's safety and health management system.

The number of onsite evaluations normally will not exceed the number of programmed inspections the Regional Administrator would otherwise expect an applicant to receive within the DGA during the Demonstration's timeframe. Where an employer does not appear on the F.W. Dodge Reports (used by OSHA in the selection of construction worksites for inspection) and does not have a history with OSHA, the number of evaluations will be at the discretion of the Regional Administrator

Before OSHA conducts worksite evaluations at sites that the applicant does not control, the applicant will need to gain written assurance that the controlling employer (for example, the general contractor) has given permission for OSHA to enter. The applicant also should arrange for the project superintendent to accompany the OSHA team during the visit. It is the applicant's responsibility to inform the controlling employer and the site superintendent of the cooperative nature of this Demonstration and this OSHA visit. The applicant must inform the controlling employer that any conditions (including those created by others) deemed a violation of an OSHA rule must be abated immediately or confirmed as abated according to an abatement plan approved by OSHA. So long as hazardous conditions are corrected immediately or with an

approved abatement plan, there will be no OSHA enforcement activity or citation. Only if correction of a hazard does not occur will OSHA proceed with normal enforcement procedures.

Reapproval

Once OSHA approves an applicant, the Agency will evaluate additional worksites every 12 to 18 months for the duration of participation. OSHA will determine the number of worksites to evaluate using the Worksite Evaluation guidelines set forth above. However, the number of evaluations conducted may or may not be the same as conducted during the initial approval process. OSHA normally will select locations randomly from a list of active construction site locations that have given their written permission (if necessary) for OSHA to come onsite. Additionally, OSHA will return to the participant's headquarters every 5 years to reevaluate the SHMS policies and procedures.

Appendix B

INJURY AND ILLNESS RATE REQUIREMENTS

Total Case Incidence Rates (TCIR) and Days Away, Restricted, or Transfer (DART) Rates

- In general, applicants must provide TCIR and DART rates that reflect the nonfatal injury and illness experience of the company's workforce within the DGA for the three most recent calendar years.
- General contractors or specialty trade contractors who employ temporary employees and/or subcontractors and have responsibility and authority for assuring safe and healthful working conditions for these workers must provide TCIR and DART rates that reflect the experience of all employees over whom they have responsibility and authority. We refer to this data, which combines an applicant's regular workforce (which includes temporary employees) and its subcontractor employees, as combined rates.
- Using data from the 3 most recent calendar years, the applicant must calculate a 3-year TCIR and a 3-year DART rate. OSHA will recalculate these rates to ensure accuracy. (Instructions on calculating 3-year rates is found on the OSHA Form 300.)

Combined Rate Phase-In Policy

OSHA expects to receive a three year combined rate from each applicant. However, if the applicant does not maintain rate information for their subcontractors they may still apply using the below phase-in policy:

- As part of the initial application, OSHA expects to receive
 - combined TCIR and DART rates for the most recent full calendar year, plus
 - company-only rates (that include temporary employees) for the two prior calendar years.

These three years of rates should reflect an applicant's nonfatal injury and illness experience within the DGA only. *(See chart below)*

- At the end of the first year of participation, participants must provide to OSHA
 - combined TCIR and DART rates that reflect the experience of the company's regular workforce (including temporary employees) and specialty trade subcontractors for the two most recent full calendar years in the DGA, plus
 - a third year of data that reflects company-only experience (which includes temporary employees).
- At the end of the second year of participation, and for each subsequent year, participants must provide to OSHA combined TCIR and DART rates for the three most recent calendar years in the DGA. The data for each of these three calendar years must reflect the

experience of the company’s regular workforce (which includes temporary employees) combined with its specialty trade subcontractors.

Example 1: An applicant is a carpenter (specialty trade contractor) who, during the past year, worked in the capacity of subcontractor on 50 different projects within the DGA, and a total of 140 projects over the past three years. For some of these jobs it used only employees paid directly by the company. At other jobs it used company employees and also contracted with other carpenter contractors (tiered subcontractors) who performed tasks directed by the applicant. For the 50 projects worked during the past year, the applicant must submit rates that combine the hours and recordable injuries and illnesses of regular employees plus subcontractors. For the 90 projects worked on during the two earlier years the applicant must only submit rates that reflect the experience of all regular employees, including temporary employees.

**Example 2:
TCIR/DART Summary Data as it would appear within A
Demonstration Application**

Year	Hours	Total # of Cases	TCIR	Number of Cases Involving Days Away from Work, Restricted Activity or Job Transfer	DART Rate
2002	114173	5	8.7	0	0
2003	115000	3	5.2	2	3.4
2004	130238	5	7.7	4	6.1
Total	359411	13		6	
Three-Year Rate (2002-2004)			7.2		3.3
BLS National Average for 2003 (NAICS: 238110)			7.3		3.9

Years 2002 and 2003 depict company employee (including temporary employees) data and TCIR and DART rates.

For year 2004 (highlighted) the company has reported combined hours, cases, and TCIR and DART rates that reflect a combination of company employees (including temporary employees) plus subcontractor employees.

Rates Needed To Qualify for this VPP Demonstration

- The applicant’s 3-year TCIR and 3-year DART rate must be below at least 1 of the 3 most recent years of specific industry national averages for nonfatal injuries and illnesses at the most precise level published by the U.S. Department of Labor’s Bureau of Labor Statistics (BLS). OSHA will compare all submitted rates against the most recent single year that would qualify the applicant out of the last 3 published years.

- For example, if OSHA compares an applicant's 3-year rates to the BLS rates for the years 2002, 2003, and 2004, and if the applicant's rates fall below the BLS rates for 2003 and 2004, then OSHA will use the BLS 2004 rate for purposes of program qualification and data collection and analysis.

Alternative Rate Calculation for Qualifying Small Employers.

- Some applicants, usually small construction companies with limited numbers of employees (including temporary employees), subcontractor employees, and/or hours worked, may use an alternative method for calculating their 3-year incidence rates. The alternative method allows the employer to use the best 3 out of the most recent 4 years' injury and illness experience.
- To determine whether you qualify for the alternative calculation method, do the following:
 - Using your company's actual employment statistics, determine hours worked during the most recent calendar year by your regular employees (including temporary workers) plus other controlled employees, for example, subcontractors.
 - Then calculate a hypothetical TCIR assuming two recordable cases during the year.
 - Compare this hypothetical rate to the 3 most recently published years of BLS combined injury/illness total recordable case incidence rates for your industry.
- If the hypothetical rate (based on two cases) is equal to or higher than the national average for your industry in at least 1 of the 3 years, you qualify for the alternative calculation method. You may use the best 3 of the last 4 calendar years of employee injury/illness experience when calculating both the 3-year TCIR and the 3-year DART rate.
- If you qualify for the alternative rate calculation, you still must submit at least one year of combined rates. At least one of the best 3 years that you submit must include both regular employees (including temporary workers) plus any subcontractor employees.

Appendix C

UNION SUPPORT FOR PARTICIPATION

OSHA expects each applicant to determine whether the requirement for union support applies. Calculate the percentage of your employees (including temporary employees) and subcontractor employees who are represented by unions at the time of your application. Then use the chart below.

IF	THEN
Majority of employees are represented by unions	Signed statement(s) required. Must be obtained from enough unions to represent a majority of employees.
Some employees but less than a majority are represented by unions	No statement of union support required.
No employees are represented by unions	Requirement not applicable.

When, at the time of application, a majority of an applicant's employees and subcontractor employees are represented by unions, the applicant must provide to OSHA written documentation of either union support for participation in the Demonstration or union non-opposition.

Unions retain the right to withdraw support at any time. In such event, OSHA will reevaluate the participant's continuing qualification.

The percentage of employees represented by unions can change. Therefore, an approved participant must report to OSHA, as part of its annual evaluation, any change in this percentage that would have the effect of changing the participant's union support requirement.

Appendix D

NOTES ON GOOD SAFETY AND HEALTH PRACTICES IN THE CONSTRUCTION INDUSTRY

The complexity of a construction company's SHMS usually will depend upon the size, the nature of the construction activities, and the general contractor's or specialty trade contractor's management role during planning and construction phases. However, successful VPP participants operating in the construction industry often utilize numerous industry good practices within their systems, such as the following:

Make subcontractors and temporary employees an integral part of the SHMS:

There are many ways to integrate specialty trade contractors and temporary employees into the SHMS. For example, some controlling employers review subcontractors' or temporary employees' safety and health policies, procedures, and protective measures, both generally and as they apply to hazardous or non-routine tasks. These controlling employers help their subcontractors improve their own SHMS. Contract agreements may also define responsibilities for safety and health inspections, hazard identification, correction of hazards, incident reporting, and tracking methods to ensure follow-up on corrective actions. In these and other ways, VPP participants ensure that subcontractors and temporary employees are protected from hazards to the same degree as the participants' own employees.

OSHA 10-hour (or equivalent) training for all employees including subcontractor employees:

Due to the nature of the construction industry, that is, short-term projects, mobile workforces, changing environments, etc., many successful construction employers require, at a minimum, OSHA 10-hour or equivalent training for all personnel on the site, including subcontractors. This training heightens hazard awareness and helps to ensure that all employees, including those of subcontractors, have the information they need to recognize and avoid unsafe conditions.

OSHA 30-hour (or equivalent) training for supervisors:

Supervisors normally are responsible for overseeing a particular operation on a construction project. They organize, direct, and control construction processes to assure, among other things, on-time completion of a quality end product. The supervisor's ability to recognize and control hazards at construction sites is not only considered an integral part of a safety and health management system; it also is an essential part of all construction-related tasks performed.

Accident prevention makes good business sense when viewed as a way to prevent and control hazards that could lead to personal injuries, property damage, or construction delays. Requiring supervisors, including those of subcontractors, to have OSHA 30-hour or equivalent training prior to commencing work will help ensure that basic hazard identification and the prevention, correction, or control of hazards will be consistent throughout the various phases of the project.

100% fall protection at 6 feet for all trades/employees:

Falls account for approximately 33% of fatalities in the construction industry. Therefore, applicants must have an aggressive and effective fall protection program. One suggested way to accomplish this is to implement a 100% fall protection program that requires all trades to have effective means for fall protection when working at elevations of 6 feet or more above a working surface.

Prequalification for all subcontractors:

Prequalifying subcontractors is one way that some general contractors ensure consistency in protecting all employees on the job. These general contractors review potential subcontractors' past safety and health performance prior to adding them to a qualified bidders list. Reviews normally focus on safety and health policies, procedures, and protective measures used, both generally and when performing hazardous or non routine tasks. Some general contractors require their subcontractors to have injury/illness rates below the Bureau of Labor Statistics industry averages and/or experience modification rates (EMR) at or below 1.

Drug testing/screening policy:

A drug- and alcohol-free workplace prevents injuries and illnesses, absenteeism, turnover, and a myriad of behavioral problems. One suggested way to begin to address these problems is to develop a drug testing and screening policy based on successful program models. Such models can be found at a number of internet websites, including the Department of Labor's Working Partners for an Alcohol and Drug Free Worksite at <http://www.dol.gov/workingpartners>.

Required daily meetings/employee safety briefings devoted to planning and safety awareness:

Many successful employers regularly conduct tool box safety meetings. The more involved employees get in the process, the better understanding they will have of the "big picture," including their safety and health roles and responsibilities. This method works for quality control, and it will work for safety and health.

Motor Vehicle Safety Program:

Recognizing the opportunity that construction companies have to save lives and prevent injuries, a growing number of safety-minded contractors have established traffic safety programs for their employees and subcontractors.