

## REVISED DRAFT – Challenge Stages at a Glance – REVISED DRAFT

1. Management Leadership			
Element	Stage I	Stage II	Stage III
<b>1.1 Management Commitment</b>			
Mission and Policy Statements	Develop S&H Mission Statement, with input from employees, and a S&H Policy Statement.	Communicate statements; incorporate into new employee/contractor orientation.	Take proactive steps to ensure understanding by all employees and contract workers and that they become a routine part of regular communication..
Leadership by Example	Begins to participate in S&H activities and follow S&H rules.	Continue; increase frequency of manager participation in S&H activities.	Continue; ensure total involvement of all executives, managers, & supervisors
Resources	Commit initial resources to control identified hazards. Begin integrating S&H into other aspects of management planning.	Provide additional resources for S&H activities, including access to certified S&H and licensed health care professionals, and improve integration of S&H into other planning processes.	Continue committing and ensuring the utilization of adequate resources. Ensure integration of S&H into all planning processes in the site.
Goals and Objectives	Establish & communicate annual S&H goals & objectives based on findings from baseline hazard and trend analyses; and assessment of the site's safety and health practices.	Review the site's progress towards achievement of S&H goals & objectives; establish & communicate new goals, as appropriate.	Review, revise, and continue communicating S&H goals and objectives. Ensure S&H goals and objectives are routinely considered in site's activities and programs.
Responsibility, Authority, and Accountability	Develop a safety and health accountability plan for managers, supervisors, and non-supervisory employees.	Enforce accountability plan.	Fully implement accountability system for all workers, including incorporation of S&H responsibilities into job descriptions and performance plans. Assign additional responsibilities to non-supervisory employees as appropriate.
Communication	Establish clear lines of communication with employees & provide reasonable access to top management re: S&H issues.	Maintain clear lines of communication with employees re: S&H issues	Encourage open dialogue between management staff and employees.
Disciplinary Plan	No action required	Develop & begin implementing disciplinary plan for managers and employees.	Ensure discipline is equability enforced, ensure higher levels of compliance.
Annual Self-Evaluation	No action required	No action required	Develop system and written procedures to annually evaluate the total site's S&H management system. Complete at least one annual self-evaluation of the site's safety and health management system.

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<b>1.2 Employee Involvement</b>			
Employee S&H Perception Survey	Conduct baseline employee S&H practices perception survey.	No action required	Conduct follow-up employee S& H perception survey.
S&H Practices Change Plan	Develop an action plan to address findings from the baseline employee S&H practices perception survey.	Implement steps defined in the site's action plan to improve S&H culture.	Continue; ensure significant improvement in S&H culture
Employee Notification	Notify all employees of their S&H rights, the site's participation in Challenge, & VPP principles.	Notify new employees of their S&H rights, site participation in Challenge, & VPP principles. Incorporate into new employee/contractor orientation.	Continue for new employees. At least annually, re-enforce for all employees. Encourage freely reporting workplace hazards without reprisal.
Meaningful Employee Involvement	Establish a few key S&H teams; begin involving employees in S&H activities.	Increase participation on teams, and/or form additional teams. Involve employees in safety and health activities (e.g., accident/near-miss investigations).	All needed teams are functioning and meaningfully contributing to S&H. Ensure regular teams are routinely conducting audits, accident/incident investigations, self-inspections, and job hazard analyses. Improve and continue the site's hazard reporting system.
<b>1.3 Contract Worker Coverage</b>			
Adherence to Rules	Require contractors and their employees to comply with OSHA and site S&H rules.	Improve and continue to enforce policy for S&H violations.	Improve and continue- enforce policy for safety and health violations.
Contractor Selection	No action required	Consider contractors' safety and health performance in the bidding process, including a review of injury/illness rates.	Fully establish and use selection criteria. Encourage contractors to develop their own S&H management systems & decrease high rates.
Contractor Hazards	Contractor ensures correction of any hazards in their work areas.	Develop & implement a formalized method including assignment of responsibility to identify, correct, & track hazards in contractors' work areas.	Include responsibility for hazard correction in writing, in the contracts.
Removal Policy	No action required	Develop & implement contractor policy for S&H violations, including removal and other penalties.	Penalty policy is understood by all contractors, described in their contracts, and adhered to.

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2. Worksite Analysis			
Element	Stage I	Stage II	Stage III
Baseline Safety and IH Hazard Analysis	Conduct the baseline analysis (may use outside sources), including a chemical inventory and evaluation of typical safety and health hazards.	No action required	Re-do baseline survey, if warranted by significant changes in tasks, equipment, or processes.
Hazard Analysis of Routine Jobs, Tasks, And Processes	No action required	Conduct hazard analysis and recommend controls for routine jobs, tasks, & processes that have had associated injuries/illnesses or significant incidents or near-misses; are perceived as high-hazard; or are required by a regulation or standard; observe guidelines.	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
Hazard Analysis of Significant Changes	No action required	No action required	Conduct hazard analysis for significant changes (e.g., non-routine tasks or new processes, materials, equipment and facilities) and recommend controls prior to the activity or use.
Pre-use Analysis	No action required	No action required	Conduct pre-use hazard analysis of new equipment, chemicals, facilities, or significantly different operations or procedures. and recommend controls prior to the activity or use.
IH Program	No action required. (See Baseline Hazard Analysis).	Follow up on results of baseline IH study. Conduct more in-depth analysis if warranted to determine actual employee exposures. Establish, document, & implement future sampling schedule, strategy, and rationale.	Continue to follow the written IH program; take proactive steps to improve control of health hazards to prevent occupational disease.
Routine Self-inspections	No action required	Develop a documented system for routinely scheduled self-inspections of the workplace; conduct inspections with S&H staff; covering entire worksite, at least semi-annually.	Continue to conduct routine self-inspections. Increase frequency to at least monthly, with the entire worksite covered at least quarterly.
Employee Hazard Reporting System	No action required	Develop & begin implementing hazard-reporting system for employees (maybe anonymous),	Encourage more active reporting; ensure regular feedback, using different media, to all employees on status of hazards reported.
Investigation of Accidents and Near-Misses	Develop and implement system to report and investigate accidents. Determine root causes and track correction to completion.	Expand system to include reporting and investigation of near misses. Continue investigating accidents, begin investigating near-misses, and making corrective actions.	Thoroughly report and investigate all accidents and near-misses.
Trend Analysis	Conduct trend analysis of injury & illness history (previous 3 years of OSHA 200/300 logs) and begin developing a plan for conducting analysis of other S&H-related information	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.	Trend analysis takes place regularly (at least annually) for all types of S&H information, and is utilized in setting future goals to address identified trends.

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<b>3. Hazard Prevention &amp; Control</b>			
<b>Element</b>	<b>Stage I</b>	<b>Stage II</b>	<b>Stage III</b>
Certified Professional Resources	(see Management Commitment)	(see Management Commitment)	(see Management Commitment)
Hazard Elimination & Control Methods	Develop an action plan to prioritize and implement controls for hazards identified, through the baseline S&IH study, trend analysis of OSHA logs and accident investigations. Implement controls or (interim protection if long-term abatement) for top priority hazards before moving onto Stage II.	Complete long term abatement projects from Stage I. Develop an action plan to prioritize and implement controls for hazards identified through self-inspections, employee reports of hazards, and near-miss investigations. Implement hazard controls (or interim protection) for top priority hazards before moving onto Stage III.	Complete long term abatement projects from Stage II. Continue to pro-actively identify, prioritize, and implement controls 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 id and control.
Hazard Control Programs	Inventory existing hazard control programs required by OSHA standards. Develop missing programs or modify existing programs.	Implement hazard control programs developed or modified in Stage I and train all workers on these programs.	Review hazard control programs annually and updated as new processes, jobs, and tasks are begun.
Documented System for Hazard Correction Tracking	Develop and begin implementing a hazard tracking system for hazards identified through the baseline hazard analysis, trend analysis of OSHA logs, and accident investigations.	Expand tracking system to include hazards identified through hazard analysis of routine jobs; self-inspections; employee reports of hazards; and near miss investigations.	Tracking system is fully functioning and includes hazards identified through all methods.
Preventive Maintenance	Conduct an inventory of equipment and machinery requiring preventive maintenance.	Review equipment inventory. Establish and implement preventive maintenance schedule.	Ensure schedule is routinely observed and preventive maintenance is regularly conducted.
Occupational Health Care Program	Conduct records review of previous three years OSHA 200/300 logs. Compare with insurance claims forms and ensure records are in order. Provide physician services for emergencies (see below).	Continue to provide access to licensed health care providers, health services, physician care, and emergency medical care. Arrange for services based on the outcomes of the baseline safety and health analysis.	Continue providing services listed in Stage I and II. In addition- Health Care providers visit the site, and assist in identifying causes and symptoms of injury/illness. Care provided in within the scope of licensure.
Emergency Preparedness and Response	Establish & communicate written procedures for responding to all types of emergencies; Make emergency services available on all shifts including: ambulances, EMT's, emergency clinics, or hospital emergency rooms. Provide at least one employee trained in first aid & CPR for each shift or an equally effective alternative. Conduct at least one evacuation drill & assess its effectiveness.	Continue providing emergency medical services. Establish an Emergency Response Team including first aid and CPR trained employees. Conduct at least one drill and assess it's effectiveness and follow-up on recommendations to improve emergency evacuation drills.	Continue providing emergency medical services. Establish a Haz. Mat. Team if necessary. Consult with local fire department to ensure adequate coverage for fire, explosion, or chemical release. Conduct evacuation drills at least annually and assess their effectiveness. Provide AED and training on its use for those on the Emergency Response Team.

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<b>4. Safety and Health Training</b>			
<b>Element</b>	<b>Stage I</b>	<b>Stage II</b>	<b>Stage III</b>
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 fundamental principles, hazards in the workplace, PPE, emergency evacuation procedures, and individual emergency responsibilities.	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.	Take proactive steps to improve & 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
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 to contract workers to equip them with knowledge & skills needed to perform their S&H responsibilities in Stage I (i.e., hazard recognition, accident investigation and root cause analysis, hazard controls, OSHA standards, and VPP requirements).	Provide specific training to managers and supervisors, to designated S&H staff and others with S&H responsibilities, and to contract workers to equip them with knowledge & skills needed to perform their S&H responsibilities in Stage II.	Take proactive steps to provide specific training to all employees and contract workers to equip them with the knowledge & skills they need to perform their S&H responsibilities in Stage III.